

**STATE OF WISCONSIN  
ELECTIONS COMMISSION**

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**IESHUH GRIFFIN,**

**Complainant,**

v.

**Case No. EL 24-07**

**CITY OF MILWAUKEE ELECTION COMMISSION  
and CLAIRE WOODALL-VOGG,**

**Respondents.**

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**VERIFIED RESPONSE OF RESPONDENTS  
CITY OF MILWAUKEE ELECTION COMMISSION AND  
CLAIRE WOODALL-VOGG**

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**INTRODUCTION**

Respondents City of Milwaukee Election Commission, (“MEC”), and Claire Woodall-Vogg, (“Woodall<sup>1</sup>”), acting by and through Assistant City Attorney Kathryn Z. Block, hereby submit the following response to the verified complaint (“Complaint”) of Complainant Ieshuh Griffin (“Griffin”).

**FACTUAL BACKGROUND**

On January 2, 2024, Griffin timely submitted nomination papers to run for alderperson in the 15<sup>th</sup> Aldermanic District in the City of Milwaukee. On that same date, Griffin was informed via e-mail that upon initial review of the MEC staff, of the 270 signatures she submitted, 221

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<sup>1</sup> Woodall-Vogg’s name has been legally changed to Woodall. There is no dispute as to the proper identity of the party at issue.

appeared to be from valid electors residing in the 15<sup>th</sup> Aldermanic District and that her name would be recommended for ballot placement. (Griffin Cmpt. Exs.) On January 5, 2024, Alderman Russell W. Stamper II, another candidate recommended for ballot placement, filed a timely Verified Complaint (“Challenge”) raising issue with 41 of Griffin’s signatures.<sup>2</sup> On that date, Griffin was informed of the Challenge via phone (by her own admission), e-mailed a copy of the Challenge, and notified that ballot placement challenges would be heard at the MEC meeting on January 8, 2024. The only written response filed by Griffin prior to the meeting was a Verified Response stating that “Candidate Russell Stamper is a liar...and his rogue private investigator as well as a known employee of the Milwaukee Election Commission, colluded to knowingly submit false information against me with reckless disregard for the truth in an effort to injury [sic] my character, reputation, and interfere with a fair and free election.” (Griffin Cmpt. Exs.)

The MEC had been provided with the Staff recommendations in advance of its January 8 meeting, which included the applicable legal standards for challenges of the types raised by Stamper: Challenges to the legibility of the elector’s name or address, challenges to the location of the elector within the district, and challenges to the validity of the stated residence. (Ex. 1 at 40-41) The standards referenced state statutes, administrative regulations, and applicable Wisconsin Election Commission, (“WEC”) guidance. (Id.)

At the MEC hearing<sup>3</sup> considering the Challenge, Woodall walked the MEC through staff analysis of each of 41 separate challenges made by Stamper. Originals of Griffin’s nominations

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<sup>2</sup> Attached as Ex. 1 to this Response is a copy of the relevant pages of the packet prepared for the January 8, 2024 meeting of the MEC, which includes a copy of the MEC Meeting Notice (at 1-2), the Challenge filed by Stamper (at 3-38), the Verified Response of Griffin to the Challenge (at 39), as well as a copy of the staff recommendations prepared for the MEC in response to the Challenge (at 40-46).

<sup>3</sup> Audio recordings of MEC meetings are not regularly kept. Griffin states she included four audio files along with her Complaint, although Respondents appear to have received only three. One of these recordings appears to be

papers were also brought to the meeting and shown to the members of the MEC during this presentation.<sup>4</sup> Additionally, Griffin was given five minutes to make a presentation as was Stamper. Ultimately, the MEC accepted the recommendations of staff, agreeing that 25 of the challenged signatures should be stricken, that Griffin had less than the required 200 signatures required by Wis. Stat. § 8.10(3)(i), and that she should not be placed on the ballot in the 15<sup>th</sup> Aldermanic District.<sup>5</sup>

### ARGUMENT

Generally, Griffin basically argues she was removed from the ballot without proper notice or an opportunity to be heard. It is accurate to state she was told that after a preliminary review by MEC staff, she was told that she would be recommended for ballot placement in a January 2, 2024 e-mail. Due to time constraints, however, MEC staff does a cursory review of nomination papers when they are submitted to determine if an address falls within a particular election jurisdiction at the time it makes such a recommendation, leaving potential challengers to raise other potential issues. (Ex. 1 at 41) Griffin complains she was unaware she had three days to correct her nomination papers pursuant to EL 2.05(4), however, candidates are directed to the WEC's October 2023 Ballot Access Procedures Manual – Nomination Papers as part of the Candidate Packet Forms and Information on the City's website.<sup>6</sup> Griffin was notified of the Challenge by phone and by e-mail on the same date it was filed (January 5) and of her right to file

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an accurate audio recording (although at times difficult to hear) of the substance of the portion of the meeting of the MEC on the 8<sup>th</sup> where Stamper's Challenge was considered, prior to the time the MEC convened in closed session to consider the matter, and reconvened in open session to vote on same.

<sup>4</sup> A copy of Griffin's nomination papers is available at

<https://drive.google.com/drive/folders/1iHRVvr4XWqx8i3reBiRvW30dDiWZysi>

<sup>5</sup> Griffin's name will appear on the Spring Primary Ballot for Mayor and the Spring Election Ballot for Alderman in District 3.

<sup>6</sup> <https://city.milwaukee.gov/election/HowtoRunforPublicOffice/CandidateForms>

a Verified Response, which she did. She appeared in person at the hearing and was given five minutes to present testimony. At no time in her Verified Response or in her testimony did she attempt to rebut any elements of the Challenge with anything other than conclusory allegations.<sup>7</sup> Lastly, the open records law was not violated. Notice of the MEC meeting was posted on the City's Legistar website, the MEC webpage, and at City Hall in the rotunda where notices are regularly posted. It included the following notice:

The Commission may adjourn into closed session under the provisions of Wisconsin Statutes Section 19.85(1)(a) for the purpose of deliberating concerning a case which was the subject of any judicial or quasi-judicial trial or hearing before the Commission. At the conclusion of the closed session, the Commission may reconvene in open session to take whatever actions it may deem necessary.

Griffin also seems to complain that there were some issues with the Challenge documents. She claims the documents were notarized by the filer; however, attorney Maistelman notarized complainant Stamper's Challenge, and the private investigator notarized the affidavits he obtained from the witness affidavits filed along with the Challenge. Griffin also complains the blank affidavit forms given to witnesses to complete provide across the top "STATE OF WISCONSIN, CITY OF MILWAUKEE ELECTION COMMISSION," in her mind, apparently indicating to the witnesses that the private investigator represented that he was an MEC employee. Attorney Maistelman stated at the January 8 hearing that in preparing the form, he was merely indicating the body before whom the forms would be filed, as has similarly been indicated by Respondents in the instant matter.

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<sup>7</sup> The two other audio recordings appear to be the ones Griffin attempted to offer at the January 8 hearing – apparent hearsay offered to rebut the affidavits offered by a property manager (Alitha Anderson) with regard to the signatures of three voters, (Marvin Bizzle, Chester Triplett, and A. Micheals), which the MEC did not find to be probative. In any event, the MEC did not accept the first challenge and even if Griffin had succeeded on the other two, she would not have enough signatures for ballot placement.

Although she did not raise them before the MEC below, Griffin now makes a few specific allegations Respondents will address here. First, that Woodall colluded with the challenger “to have me impermissibly removed from the ballot, by creating fictitious nomination papers with dead people names that included the name Marvin Bizzle...” This allegation is somewhat confusing. While the challenger alleged that the name appearing on line one of page nine was Marvin Bizzel (and that he had been deceased since 2022), staff read the name as Maybell Bizzel, recommended rejecting the challenge, and the MEC preserved the name.

Griffin states that Woodall “impermissibly acted as a handwriting expert, knowingly lying about an elector signing his signature with TWO Ls, when it is clear he did NOT. All the letter ‘e’ are the same the letter “L” is different...” In support of the challenge, an affidavit was submitted from a Reginald Vernell residing at the same address listed on the nomination paper, stating he did not sign Griffin’s nomination papers on the listed date. Vernell printed and signed his name on the affidavit “Vernell” and that is also how he is registered to vote, but the signature and printed name on the nomination papers was “Vernel.” Woodall merely noted that the discrepancy supported the challenge.

Griffin argues the last name of the person signing on page 1, line 1 was improperly struck for illegibility, claiming it is clearly “Hu,” and that [t]he person whom did the review UNDERSTOOD the name and did NOT provide and [sic] affidavit that he/she could not or did not.” Presumably, Griffin is attempting to argue that the staff person at the MEC who did the initial review could read the name and did not later correct themselves. As previously stated, however, this is not how the MEC staff review nomination papers – they are reviewed only for address location within the relevant district (or municipality).

Lastly, Griffin notes two addresses that have taxkeys on the City's website (2817 W. North Avenue and 2612 W. Center Street). Both addresses do fall within the relevant aldermanic district. The North Avenue address was challenged on the basis it was a vacant lot. MEC staff investigation found that not the be the case, however, it was an empty commercial real estate property owned by the City since 2016. Staff confirmed with the Department of City Development it was unoccupied. The Center Street address was also challenged as a vacant lot (or nonexistent). Staff investigation determined the Center Street address is a house of worship owned by Village Ministries. Because it could be that an elector is temporarily using the church to receive services, a presumption of validity was applied and the signature was preserved.

### CONCLUSION

For the foregoing reasons the WEC should enter an appropriate judgment, dismissing Griffin's Complaint.

Dated this 5<sup>th</sup> day of February, 2024

Respectfully submitted,

*Electronically signed by Kathryn Z. Block*  
Kathryn Z. Block (State Bar No. 1029749)  
*Attorney for Respondents Milwaukee Election*  
*Commission and Claire Woodall-Vogg*  
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**VERIFICATION**

I, CLAIRE WOODALL, being first duly sworn upon oath, state that I personally read the above Verified Response and that it is true and correct based upon my personal knowledge.

Dated this 6<sup>th</sup> day of February, 2024.



\_\_\_\_\_  
Claire Woodall  
Executive Director, Milwaukee Election Commission

Subscribed and sworn to before me this  
6<sup>th</sup> day of February, 2024.

  
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Notary Public, State of Wisconsin

My commission expires 05/23/2025

