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Date: 2-16-24

Pages (Including Cover): 19

FROM: Keshuh Giff

TO: Wisconsin Election Commission

Company: _____

Company: Wisc Elec Commission

Name: Keshuh Giff


Name: Administration

Phone: 414-239-2112

Fax: 1-608-267-0500

Comments:

Formal Verified Response to Respondent
Fabricated, False Non-Compliance
Reply in regards to Appeal of Jan. 18, 2024
decision by MEC to unlawfully remove
me from bullet for Dist 15 Alderperson
Exhibits attached AND mailed


Keshuh Giff

VERIFIED SWORN APPEAL RESPONSE

(Exhibits attached/audio included)

I, FORMALLY file this verified appeal response to the respondents' answer to my verified appeal filed before the Wisconsin Election Commission regarding the filing officer's decision on January 8, 2024 to REMOVE my name from the ballot for alderperson for the 15th District. This response is made to the Wisconsin Election Commission through this submission of sworn written statements. To the extent as applicable by law, I, being the appellant, herein referenced as 'the appellant' requests that the administrative body take any and all judicial notice and judicial cognizance of all federal and state law as cited infra. My signature below verifies and affirms, under oath, UNDER PENALTY OF PERJURY the following **facts** that are **true** and **correct** to the best of my personal knowledge, recollection and belief as it relates;

The respondents' 'factual background', starting on page 1 is FALSE, a reckless disregard for the truth. The e-mail sent did NOT state 'upon initial review 'there 'appeared' to be 221 valid signatures. For the record in, WEC Case No. EL 20-03, In the Matter of Nomination Papers Filed by David D King, petitioner, the Milwaukee Election Commission, acknowledged under oath to the Wisconsin Election Commission page 6, stated the City of Milwaukee Election Commission completes a thorough, line by line review of all nomination papers...the process INCLUDES an initial review FOLLOWED by an 'executive review', by the Milwaukee Election Commission. COMPLETING the review at these levels is considered IMPERATIVE by the Milwaukee Election Commission to the ballot CERTIFICATION process (**Emphasis Added**).

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The respondents' knowingly LIED to the Wisconsin Election Commission on page 2, when they stated that ' the only written response was a verified statement...' not only did the verified statement refute the non verified complaint of Stamper (as an attorney cannot act as a witness and counsel) , the appellant as provided in the exhibits filed a verified 'affidavit of correction' as it relates to a 'signature nomination review tracker' that Woodall gave the appellant on the FIFTH, and no time before. (See Exhibit Attached). Woodall purposely kept this vital information out of the board meeting, and failed to acknowledge or address it.

The appellant also filed a verified challenge that Stamper submitted a plethora of false signatures. Again, Woodall purposely kept this vital information out of the board meeting, and failed to acknowledge or address it. Both are stamped as received by the City of Milwaukee election commission on January 5, 2024 at 4:34 p.m., Woodall received them purposely AND refused to allow the appellant to turn in ADDITIONAL signatures for the 15th district, stating that it was 'too late'. The appellant asked Woodall how, and stated that at no time did she state the appellant was short signatures until the FIFTH, when she handed the appellant the 'tracker'.

The 'five minute presentation' noted by the respondents, was unconstitutional, in violation of the Administrative Procedure Act, and was interrupted several times by both board members and Stamper's attorney. The respondents' attorneys have unlawfully tried to recharacterize the appellant's argument, and is objected to and refuted. The appellant's removal from the ballot is as stated in the appeal; 'not in conformity with clearly established law as detailed'.

The respondents' have literally knowingly falsified and lied to the Wisconsin Election Commission regarding 'constraints' and a cursory review'. The fact of the matter is that Woodall

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on January 2, 2024 BEFORE and DURING the review of the appellant’s nomination papers gave Stamper exclusive access to the nomination papers. As confirmed in the audio provided Stamper hired a private investigator on the 2nd, the very same day, he and Woodall on the 2nd, RECHARACTERIZE nomination papers and also took dead people names off of information ONLY in Woodall’s possession and began unlawful acts that included impersonation of Election Official staff and doctoring affidavits.

The respondents’ provided the Wisconsin Election commission with altered affidavits that stated a signing date of Januray4, 2024. The audio provided Les Johns, under oath acknowledges clearly that he took the affidavits on the 3rd, and purportedly got signatures. The original affidavits are not provided to the Wisconsin Election Commission as Althea Anderson did not state the things in the doctored one, even in her recorded audio as provided she states she did NOT provide such information.

Woodall should be removed from office due to her serious election official misconduct. The appellant refuted Stamper’s falsified complaint in its entirety, as shown in the exhibits attached. A void document can NOT be considered. A notary cannot notarize his own work nor help a customer with a notarized document. Maiseltelman notarized his own work which by law is illegal and VOIDS the documents in its ENTIRETY. Les Johns, created notarized papers with the Milwaukee Election Commission headed with the approval of Claire Woodall Vogg and told elders and an employee what to write and did so with reckless disregard for the truth, on the third and then altered the affidavits on the fourth.

Woodall also unlawfully used a city worker as an unverified witness, purporting to provide hearsay that a building had been vacant. Under the adverse possession law, a person

whom has posses a property for over 20 years is the true owner, further, what the City of Milwaukee voters are being subjected to has not been subjected to the citizens of the state of Wisconsin as a whole .

These acts of the respondents are arbitrary, capricious, discriminatory and unlawful. The Wisconsin Election Commission just complied with a court order regarding addresses of electors that is applicable in this appeal. The electors provided addresses that included a street number, street name, and municipality. The actions and inactions of the respondents are it is in direct violation of the recent court order as it relates.

A local internal administration policy for a municipality's officers is neither an election related rule promulgated by law nor is said policy in conformity with clearly established state and federal law. The respondents unlawfully promulgated unconstitutional rule making [non]authority of the respondents in violation of chapter 227 of Wisconsin states as it relates to administrative law cited nowhere else in clearly established 'law'. This is a 'society' of 'laws'. The laws of a state are to be found in its statutory and constitutional enactments.

Furthermore, specifically Title VI is being violating by the respondents as they are 'excluding ' from 'participation as well as 'denying the electors 'the benefits of citizens as a whole and subjecting a disproportionate group to discrimination as the municipality receives election related federal funding. Further, it is a direct violation of section 2 of the Voting rights Act of 1965, 42 USC sec 1973.

The respondents' failed to refute *each* verified statement of law and fact in the appellant's verified appeal filed before the Wisconsin Election Commission. Averments in a pleading to which a responsive pleading is required are deemed admitted when not denied in the responsive

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The filing officer by way of written correspondence stated to the appellant that she had a sufficient number of valid signatures and ‘all other filing requirements had been met, and that her name would be placed on the ballot. A candidate’s name cannot be removed from ballot once the candidate qualifies for nomination, the respondents’ as trained election officials are aware of this mandatory law. The respondents have a mandatory duty owed to the appellant to place her name on the ballot.

The respondents’ have purposely failed to follow their own election laws and purposely created a ‘separate and unequal’ set of NON existence non promulgated election laws only applicable to the appellant with the purpose of discriminatory intent and minority vote dilution. This conduct has and continues to violate the appellant’s equal protection and due process rights and the will and intent of the voters.

The respondents cannot satisfy their burden by piling on ‘inferences upon inferences’. There is no legal justification for any of the discriminatory acts and omissions of the respondents’ against the appellant and the qualified electors whom nominated the appellant to have her name placed on the ballot for the election for Alderperson, District 15. The express will of the voters cannot be rejected. See **Roth v LaFarge Sch, Dist Bd of Canvassers**, 268 Wis 2d 335, 674 NW2d 553.

A statutory ‘scheme’ that denies a candidate a place on the ballot is unconstitutional. See **Williams v Rhodes**, 393 U.S. 23. It is the will of the people and not the personal preferences of those clothed under ‘color of law’ as to who their elected public representatives should be. See **Cousins v Wigoda**, 419 US 477. The respondents’ are unlawfully interfering with the

appellant’s constitutional right to work for public service as a public servant. The protections of the Due Process Clause extend to public servants. See **Wieman v Updegraff**, 344 U.S. 183.

The Wisconsin Election Commission’s administration website indicates that ‘among many other roles; ‘the agency ensures compliance with federal and state election laws.’ The respondents’ essentially have unlawfully promulgated a new unpromulgated purported election ‘law’, in violation of the administrative procedure act, and having unlawfully created this new unpromulgated purported election ‘law’ applicable only to the appellant ;

The qualifications of electors as proscribed by state Constitution as well as the State legislation cannot be added to or impaired by the respondents. The respondents were without statutory authority to enlarge the State of Wisconsin’s ballot placement qualifications. See **State ex rel. Knowlton v Williams**, 5 Wis 308, **State ex rel Wood v Baker**, 38 Wis 71. A statutory ‘scheme’ that denies a candidate a place on the ballot is unconstitutional. See **Williams v Rhodes**, 393 U.S. 23. Federal law renders it a crime for any person to “knowingly and willfully deprive, defraud, or attempt to deprive or defraud the residents of a State of a fair and impartially conducted election process by procurement, casting, or tabulations that are known by the person to be materially false, fictitious or fraudulent. See **52 U.S.C.§ 20511(2)**. (Emphasis Added).

The respondents’ by way of corruption and dishonest services and violations of clearly established federal and state law in a concerted effort to impeded on the will of the voters and as such has caused irreparable injury to the appellant and the will of the voters who were, are and have tried to conduct business and engage in lawful interstate commerce. The respondents essentially have unlawfully promulgated a new election rule, applicable only to the appellant that

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The actions and decision and orders to deny myself the rightful earned ballot placement by way of the will of the people cannot stand as a matter of law. The state and federal constitutions provide 'identical' procedural due process and equal protection safeguards. See **County of Kenosha v C&S Management, Inc, 223 Wis.2d 373, 588 N.W.2d 236**. Wisconsin Constitution, Section 22 guarantees the 'maintain of free government', which can only be maintained by a firm adherence to justice, moderation, temperance...and virtue to 'fundamental principles'.

The actions of both the Milwaukee Election Commission as well as the Board of Election Commissioners were arbitrary, capricious and not in accordance with the Wisconsin statutes. Wisconsin Election rules were not properly applied. Not only was Vogg the 'filing officer for the complaint, she was the investigator, 'expert witness' and 'advocate, also personally participating in the closed door decision making and acted as an advocate for the complainant Stamper. Due process as such, was violated.

The challenge is as it stands, and it falls exactly where it stands. The challenge failed to meet its burden of proof, in its entirety. The appellant has met all conditions precedent in the verified appeal, and verified appeal's reply. The same cannot be stated for the respondents as their pleading is nothing more than a perjury riddled legally insufficient purported verified response, failing to refute arguments as such by clearly established law, the appellant's verified appeal has been 'admitted to ' by the respondents'.

Conclusion

The appellant requests that the respondents' perjury riddled legally insufficient purported verified response with reckless disregard for the truth be quashed and the Wisconsin Election Commission order that the respondents place the appellant's name on the ballot forthwith, as it is

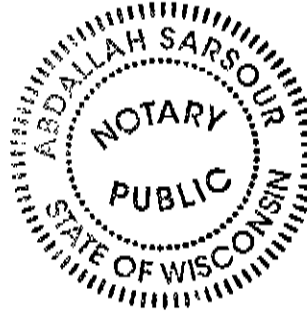
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an earned right of the appellant and the will of the voters by way of over 200 sufficiently valid nomination signatures. It is the will of the voters that must be the starting point and the ending point of all election related laws.

Being first duly sworn under oath, my signature below verifies and affirms, under oath, **UNDER PENALTY OF PERJURY** the above statements are **facts** that are **true** and **correct** to the best of my personal knowledge, recollection and belief.

Signed before a notary this 16th day of February 2024

Leah Griffin
Appellant/Candidate



Notary

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Exhibits

- 1. FOUR AUDIO (mailed and will be received before the response deadline)**
- 2. Verified response to challenger Stamper, stamped and dated Jan. 8, 2024 by the MEC. . Stamped and dated received by the MEC.**
- 3. Verified affidavit of correction stamped and dated January 5, 2024 the DATE the appellant found out verbally from Woodall from a spreadsheet that nomination signatures were reduced. . Stamped and dated received by the MEC.**
- 4. Verified complaint stamped and dated January 5, 2024 CHALLENGEING Stamper nomination signatures. Stamped and dated received by the MEC.**


VERIFIED RESPONSE

Verified Response to challenger Russell Stamper's flagrantly FALSE complaint

My signature below verifies and affirms under oath, UNDER PENALTY of PERJURY the following facts that are true and correct to the best of my personal knowledge, recollection and personal research;

Candidate Russell Stamper is a liar. Candidate Stamper 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 injure my character, reputation and interfere with a fair and free election. I have my own evidence to support these facts and will be producing such at the board hearing on Monday, Jan. 8, 2024. I refute the allegations made in Stamper's FALSE complaint in its ENTIRETY.

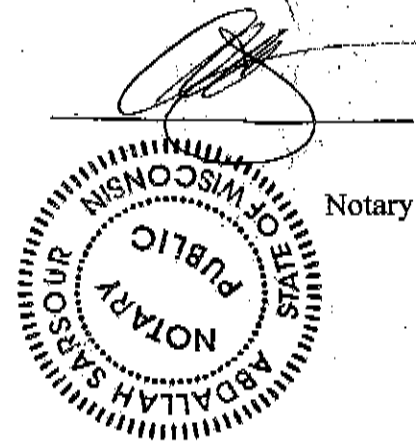
Signed this 8th day of January, 2024 before a notary.


Jeshua Griffin
Affiant

RECEIVED

2024 JAN -8 A 11:21

CITY OF MILWAUKEE
ELECTION COMMISSION



Notary

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VERIFIED COMPLAINT

of Tereshuk Griffin

Verified Complaint challenging candidate Russell Stamper

I Tereshuk Griffin under oath
Pursuant to EL 2.07 (3)(d). My signature below verifies and affirms under oath, UNDER

PENALTY of PERJURY the following facts that are true and correct to the best of my personal knowledge, recollection and personal research;

Candidate Russell Stamper has a MULTITUDE of nomination papers TOO many to cite given the time constraint in which ELECTORS have stated they did NOT sign their name on those messy papers in which he turned into the Milwaukee Election Commission. I will try my best to get affidavits and AUDIO and if possible HUMAN BEINGS to attend the Monday meeting on January 8, 2024 as it relates.

As such his signatures and nomination papers should be STRUCK in its entirety. It would be impossible for me to know which signatures the Milwaukee Election Commission approved of and did not as to compare and contrast.

Signed this 5th day of January, 2024 before a notary.

[Handwritten Signature]

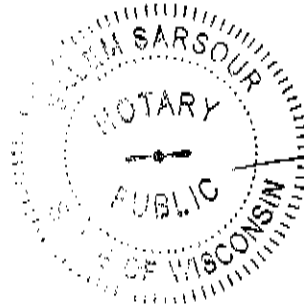
Affiant

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2024 JAN - 5 P 4: 34

CITY OF MILWAUKEE
ELECTION COMMISSION

Milwaukee County, 1/5/24



[Handwritten Signature]

Notary

Exp. 8/8/27

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