

STATE OF WISCONSIN
BEFORE THE ELECTIONS COMMISSION

David A. VanderLeest
146 Alpine Dr.
Green Bay, WI 54302

Complainants,

v.

Celestine Jeffreys,
Clerk for the City of Green Bay
100 N. Jefferson St.
Room 106
Green Bay, WI 54301

Municipal Board of Canvassers: Celestine Jeffreys, Jaime Fuge, Pam Vanderbloemen,
Steven Grenier
100 N. Jefferson St.
Room 106
Green Bay, WI 54301

Respondent.

COMPLAINANT'S REPLY TO DEFENDANT'S 2ND RESPONSE
AND MOTION TO STRIKE UNTIMELY RESPONSE BY DEFENDANTS AND COMBINED
AFFIDAVIT

STATE OF WISCONSIN)
) SS.
BROWN COUNTY)

Comes now David VanderLeest, by special visitations, individually, hereby explicitly reserving his First Amendment Constitutional Rights in Good Faith, to amend this and all subsequent pleadings, should future events and/or discoveries prove necessary.

I would like the court to take judicial notice, I am appearing Propria Persona. "Pleadings in this case are being filed by a Plaintiff in Propria Persona, wherein pleadings are to be considered without regard to technicalities. Propria, pleadings are not to be held to the same high standards of perfection as practicing lawyers." See Haines v. Kerner 92 Sct 594

INTRODUCTION

Complainant, David A. VanderLeest, appearing **Pro Se**, respectfully submits this Final Reply and Motion to Strike Respondent's Response filed untimely, on January 28th 2025, for the following reasons:

The Respondent's objection fails to provide substantial evidence that the complaint is untimely or lacking in merit. Furthermore, the Respondent's assertions are based on misinterpretations of Wisconsin election law, and the complainant continues to assert that a clear violation of Wisconsin Statutes occurred, necessitating further investigation into the alleged tampering and the subsequent recount process.

The objections raised by the Respondent should be stricken as they fail to challenge the validity of the claims presented, ignore key facts, and undermine the complainant's constitutional rights to challenge election practices. The motion is based on the premise that the Respondent has improperly attempted to dismiss valid concerns regarding election security under Wis. Stat. § 5.06

BACKGROUND

The Complainant, David VanderLeest, is a registered Wisconsin voter and resides in the City of Green Bay. The Respondents, including City Clerk Celestine Jeffreys and members of the Municipal Board of Canvassers (BOC), are election officials responsible for overseeing the recount of the Green Bay City Council, District 6 election held on April 2, 2024.

The Respondent, Celestine Jeffreys, is the City Clerk for the City of Green Bay, and the Municipal Board of Canvassers (BOC), consisting of Celestine Jeffreys, Jaime Fuge, Pam Vanderbloemen, and Steven Grenier, are election officials within the meaning of Chapters 5 and 6 of the Wisconsin Statutes. The BOC, under the direction of Clerk Jeffreys, is responsible for certifying the election results and overseeing the recount process in the Green Bay City Council race, District 6.

During the recount process on April 12, 2024, the Complainant discovered significant discrepancies in ballot security, particularly with tamper-evident seal serial numbers on ballot bags not matching the EL-104 forms. The Board of Canvassers dismissed these issues and proceeded with the recount and certification despite clear evidence of procedural failure, violating Wisconsin election law and undermining election integrity.

The Complainant further presented evidence that:

- The complainant alleges that during the recount of the City Council election held on April 2, 2024, discrepancies were discovered regarding ballot security, specifically regarding the tamper-evident seal serial numbers on ballot bags not matching those on the EL-104 forms.
- The complainant further claims that this issue was dismissed without consideration by the BOC, which proceeded with the recount and certification despite credible evidence of procedural failure, thereby undermining the integrity of the election and violating Wisconsin election law.
- Ballot stuffing occurred at Ward 21, where according to the defenses own response only 30 consecutive ballots in a ward where 192 votes were cast for a single candidate, not 45 as I erred in stating in my complaint, I would like to thank the defense attorney for catching that it was only thirty ballots cast in a row, one candidate went 30 in a row and 44 to 1 in the first 45 votes, which should still raise one huge red flags of fraud, in a ward where only 192 total ballots were cast, and the election was in recount threshold.
- Absentee ballot envelopes were improperly stamped with Clerk Jeffrey's initials by election workers rather than signed with the two election workers' own initials as required under Wisconsin law.
- Election inspector affiliations were misrepresented, with **KNOWN** partisan actors listed as unaffiliated, violating Wisconsin election procedure.
- Clerk Jeffrey has a pattern of prior election law violations for failing to ensure proper oversight of election security.
- Failure to conduct a manual recount despite the irregularities observed, contrary to Wis. Stat. § 5.90(3), which grants the right to request manual counting when warranted by inconsistencies.
- Lack of ballot chain of custody records, making verification impossible, violating Wis. Stat. § 7.51(3)(a).

The Defendant's 2nd Verified Response is Untimely and Must Be Stricken

The Complainant hereby moves to strike the Defendants' response on the grounds that it was not filed within the prescribed time frame under Wisconsin law. Wisconsin courts have consistently held that procedural deadlines are mandatory, and failure to comply results in waiver of the right to respond. See *Eby v. Kozarek*, 153 Wis. 2d 75, 450 N.W.2d 249 (1990) (holding that failure to timely respond results in procedural default). The Respondents have failed to demonstrate **good cause** for their **late response**, and therefore, this Court should **strike their submission in its entirety**.

Furthermore, in *State ex rel. Kalal v. Circuit Court for Dane Cnty.*, 2004 WI 58, 271 Wis. 2d 633, 681 N.W.2d 110, the Wisconsin Supreme Court reaffirmed that

statutory interpretation should be applied strictly to procedural deadlines, ensuring compliance and preventing undue prejudice to the opposing party. The Defendants' failure to adhere to statutory deadlines is a clear procedural defect that warrants striking their response.

Under **Wis. Stat. § 227.44(2)**, administrative agencies are required to provide a fair and timely hearing. The filing of a complaint after an excessive delay undermines this statutory mandate and threatens due process protections afforded to all parties. Untimely delays have now caused this case to wait 5 months, originally filed on September 20, 2024.

Further, **Wis. Stat. § 227.49(1)**, governing petitions for rehearing, imposes a **20-day** deadline for seeking review of agency decisions, illustrating the Legislature's intent to ensure that administrative disputes are resolved in a timely manner. While this case does not involve a rehearing request, the statutory framework reinforces the principle that administrative complaints should not be delayed indefinitely.

Wisconsin courts and administrative bodies have consistently dismissed cases for untimeliness. For example: In *Lindner v. LIRC*, **2020 WI 56, 392 Wis. 2d 717, 946 N.W.2d 707**, the Wisconsin Supreme Court reaffirmed that administrative deadlines are to be strictly enforced, particularly when delays impair the fact-finding process and **create procedural unfairness**.

Additional case law further supports striking an untimely response:

- *Town of Burke v. DNR*, 2018 WI App 55, 384 Wis. 2d 374, 918 N.W.2d 394 (**holding that statutory deadlines in administrative proceedings must be strictly adhered to and failure to do so invalidates the action taken**).
- *State ex rel. Czapiewski v. Milwaukee City Serv. Comm'n*, 2000 WI App 221, 239 Wis. 2d 325, 620 N.W.2d 487 (holding that failure to file a timely response in an administrative dispute constitutes waiver of rights and results in dismissal).
- *Outagamie County v. Smith*, 38 Wis. 2d 24, 155 N.W.2d 639 (1968) (affirming that courts have discretion to strike untimely filings and that procedural rules must be upheld to maintain fairness in administrative law proceedings).
- *Board of Regents v. Dane County*, 2000 WI App 211, 238 Wis. 2d 810, 618 N.W.2d 537 (holding that failure to meet statutory deadlines in administrative matters results in **default and loss of procedural standing**).
- In *Barry L. Ball v. Richard Schneider* (2007), the Wisconsin Court of Appeals dismissed a petition as untimely under **Wis. Stat. § 893.735(2)**, **recognizing that untimeliness fundamentally undermines the fairness of administrative and judicial proceedings**.

These cases reinforce that the Defendants' untimely response is invalid and should be stricken from the record.

REPLY TO 2ND VERIFIED RESPONSE FROM DEFENSE

A. COMPLAINANT'S ASSERTIONS REGARDING 'QUALIFYING STICKS'

Complainant VanderLeest respectfully submits this response to the assertions made by Respondents regarding the relevance of the misplaced "Qualifying Sticks" to the claims presented in his Complaint. Contrary to Respondents' contentions, the misplaced devices raise significant concerns regarding election integrity, chain of custody, and compliance with Wisconsin election laws.

I. The Loss of Qualifying Sticks Undermines Election Integrity

Wisconsin law establishes strict procedures for the handling of election equipment to ensure both the integrity and security of the electoral process. The misplacement of "Qualifying Sticks," regardless of whether they contained election results, raises substantial concerns under Wisconsin law.

Under **Wis. Stat. §5.84(1)**, all electronic voting equipment must be tested prior to each election to ensure proper functionality. The fact that Respondents acknowledge that "Qualifying Sticks" are used in pre-election testing underscores their significance. Any misplacement of such devices calls into question whether proper testing occurred and whether the programming was secure and correctly implemented.

Furthermore, in **Kennedy v. Dane County Bd. of Canvassers, 200 Wis. 2d 584 (Ct. App. 1996)**, the Wisconsin Court of Appeals emphasized the necessity of maintaining strict compliance with election security procedures. The court noted that any deviation from established procedures that has the potential to affect election outcomes is grounds for judicial review and possible remedial measures.

II. The Chain of Custody of Election Equipment is Critical

Wisconsin law mandates that election officials maintain a proper chain of custody for all voting-related materials. Under **Wis. Stat. §5.89**, municipal clerks are responsible for ensuring secure handling and storage of election materials. The loss of any election-related device—even those used in pre-election testing—raises concerns about compliance with statutory requirements.

In **Curtis v. City of Milwaukee Election Comm'n, 253 Wis. 2d 500 (Ct. App. 2002)**, the court ruled that procedural failures in election material handling, even if

seemingly minor, warranted scrutiny because they undermined public confidence in the electoral process. Similarly, in this case, the misplacement of "Qualifying Sticks" casts doubt on whether proper procedures were followed in preparing for the election.

Additionally, **Wis. Stat. §7.23(1)(g)** requires that election records and equipment be securely maintained for a period of at least 22 months following an election. Failure to properly secure or account for voting-related devices violates this statutory mandate and could result in a breach of election security standards, as reinforced in **Zignego v. Wisconsin Elections Comm'n, 2021 WI 32**.

III. Relevance to the April 2, 2024 Election

Respondents argue that the misplaced devices are irrelevant because they were used for the February 2024 Primary Election. However, this assertion overlooks the broader implications of lost election-related equipment. If election officials failed to properly secure devices used in one election, it raises legitimate concerns about whether similar security lapses may have occurred in subsequent elections, including the April 2, 2024, contest.

The Wisconsin Supreme Court has recognized that election integrity concerns are not limited to isolated instances but must be evaluated in the context of overall electoral procedures. In **State ex rel. Zignego v. Wisconsin Elections Comm'n, 2021 WI 32**, the Court underscored the importance of following election security protocols, stating that failure to adhere to established procedures erodes voter confidence and the legitimacy of election outcomes.

Similarly, in **Roth v. Lafarge School Dist. Bd. of Canvassers, 2004 WI App 266**, the court held that election irregularities, even if not directly tied to the final vote count, could justify scrutiny of an election's overall integrity. Here, the loss of essential election programming equipment casts doubt on the sufficiency of election security measures for the April 2, 2024, election.

For the foregoing reasons, Complainant VanderLeest asserts that the loss of "Qualifying Sticks" is relevant to the claims in his Complaint. Wisconsin case law supports the principle that adherence to election security measures is paramount, and any deviation from statutory procedures, including the misplacement of election-related equipment, warrants investigation and potential remedial action. Additionally, Wisconsin statutes clearly define requirements for maintaining secure election procedures and records. Accordingly, Complainant respectfully requests that this matter be given full consideration and that appropriate measures be taken to ensure election integrity and compliance with Wisconsin law.

B. VANDERLEEST'S REPLY ON BALLOT IRREGULARITIES ALLEGATIONS

While the response to VanderLeest's allegations attempts to refute the claim of ballot stuffing by highlighting inaccuracies in the number of sequential ballots cast for a single candidate, it does not adequately address the core statistical improbability of the results.

1. 30 Consecutive Ballots Still Present a Serious Concern

Even if VanderLeest erred in the number of consecutive ballots cast for Joey Prestley, the fact remains that 30 ballots in a row were marked for the same candidate in a ward with only 192 total votes. Prestley received 30 votes in a row, then one vote for Campbell then 14 more for Presley. **Give me a break.** This is still a substantial anomaly that cannot be dismissed simply by pointing out that 45 was an exaggeration. In any statistical model of election results, even in areas with strong candidate preference, an uninterrupted sequence of 30 identical votes remains highly improbable without external influence.

2. Statistical Improbability of Results Even with Randomization

The defense suggests that ballots are randomized to protect voter secrecy, but randomization does not create uniform clusters of votes. If ballots are indeed shuffled, one would expect a more evenly distributed pattern of candidate selection, rather than long consecutive streaks favoring a single candidate. The fact that such a streak exists—even if the order were random—still indicates a fundamental irregularity.

3. Low Total Vote Count Makes the Anomaly More Pronounced

With only 192 total votes cast in Ward 21, the likelihood of 30 consecutive votes for the same candidate occurring naturally is exceedingly low. If the ballot images were indeed randomized, the chance of such a large block of uniform votes clustering together would be nearly negligible. The response provided does not address why, even under random conditions, such an unlikely pattern exists within a small dataset.

4. Failure to Address the Core Issue of Potential Manipulation

The response focuses on nitpicking the exact number of ballots rather than engaging with the substantive concern: whether an external influence, such as ballot stuffing, could explain the statistical anomaly. While some differences exist among ballots, the pattern of votes strongly suggests an artificial grouping rather than a naturally occurring variation in voter choice.

Rather than disproving VanderLeest's claims, the response inadvertently confirms that an anomaly exists—albeit slightly smaller than initially claimed. Whether it was 45 or 30 consecutive votes for one candidate, such clustering in a small dataset is a significant red flag. The argument that votes were randomized does not sufficiently

explain the improbable sequence observed. Without further investigation or a transparent recount, the concerns raised about ballot irregularities in Ward 21 remain unresolved.

C. WISCONSIN LAW REQUIRES THE CLERK OR THE DEPUTY CLERK TO INITIAL ABSENTEE BALLOTS.

VanderLeest's True Concern: Ballot Authenticity and Chain of Custody

VanderLeest's primary concern involves the possibility that absentee ballots, when not processed according to prescribed procedures, could be subject to tampering, fraud, or improper handling. Specifically, VanderLeest raises concerns about the use of stamps by unauthorized individuals to initial absentee ballots. While his interpretation may not entirely align with Wisconsin law, his concern is rooted in the integrity of the absentee voting process.

The chain of custody of absentee ballots is essential to ensuring that ballots are issued properly, securely transmitted, and accurately counted. The clerk or deputy clerk's initials on absentee ballot envelopes serve as a crucial verification of this chain of custody. VanderLeest's concern is that unauthorized use of a stamp to initial absentee ballots could compromise the authenticity of these ballots and the security of the election process.

Relevant Statutes and Procedures

1. **Wis. Stat. § 6.86(1)(ar)** – This statute mandates that the absentee ballot envelope must be initiated by the clerk or deputy clerk to verify that the voter has provided the proper identification. It does not say someone else can do this with their stamp.
2. **Wis. Stat. § 6.87(1)** – This statute further requires that absentee ballots themselves be initiated by the clerk or deputy clerk to verify the ballot's authenticity.
3. **Election Administration Manual** – The Wisconsin Elections Commission's guidelines reinforce the requirement that absentee ballot envelopes must be initiated by the clerk or deputy clerk directly to ensure authenticity. This is not happening properly in Green Bay during in person absentee voting. I can not speak to how long term absentee ballots are mailed. I only have first hand knowledge that other people used the clerks stamp all the time for in person absentee early voting as I have observed as an election observer.

Case Law Supporting the Clerk or Deputy Clerk's Role in Initialing Absentee Ballots

Several cases emphasize the importance of adhering to election law procedures to maintain the integrity of absentee ballots and prevent unauthorized interference with the process:

1. **Roth v. La Farge Sch. Dist. Bd. of Canvassers, 2001 WI App 221**

In this case, the court considered a ballot that was missing one of the required inspector initials but held that minor technical defects did not invalidate the ballot unless they significantly impacted voter intent. However, the case underscores that the failure to follow statutory procedures—such as the unauthorized use of stamps—cannot be excused as substantial compliance.

2. **Ollmann v. Kowalewski, 238 Wis. 574, 300 N.W. 183 (1941)**

The Wisconsin Supreme Court found that minor procedural errors should not automatically disenfranchise a voter, provided there was no compromise of the voter's intent. However, it also reinforced the need for specific officials (e.g., the clerk or deputy clerk) to follow established procedures, implying that others cannot perform duties like initialing ballots.

3. **State v. Kiedrowski, 2001 WI App 253**

While this case did not directly address the use of stamps for initials, it reinforced the necessity of following election procedures to avoid confusion and errors in voter intent, which could apply to unauthorized initials by stamp.

4. **State v. Schaefer, 133 Wis. 2d 72, 394 N.W.2d 767 (1986)**

The Wisconsin Supreme Court reaffirmed that strict compliance with election laws is essential, particularly concerning absentee ballots. Any deviation from the statutory procedures, such as using a stamp to initial a ballot, undermines the integrity of the process and could open the door for challenges.

5. **Lange v. Election Bd. of Village of Shorewood Hills, 2001 WI App 236, 248 Wis. 2d 619, 635 N.W.2d 191**

This case established that failure to maintain the integrity of election procedures could invalidate the results of an election and may require a new election to be held.

6. **Kuehn v. Elections Bd., 104 Wis. 2d 147, 310 N.W.2d 624 (Ct. App. 1981)**

This case confirmed that courts have the authority to review and overturn election results when statutory noncompliance is demonstrated.

7. **Town of Delafield v. Winkelman, 2004 WI 17, 269 Wis. 2d 109, 675 N.W.2d 470**

The court held that improper election administration is grounds for judicial intervention and corrective action.

The Illegality of Using Another Person's Stamp

While administrative tools such as stamps may be used for efficiency in jurisdictions with high absentee ballot volumes, Wisconsin law requires that only the Clerk or Deputy Clerk may apply their initials, whether by hand or stamp, to absentee ballot envelopes. The unauthorized use of another person's stamp to initial absentee ballots directly contravenes the statutory requirements.

1. **Statutory Compliance** – Both **Wis. Stat. § 6.86(1)(ar)** and **Wis. Stat. § 6.87(1)** clearly stipulate that only the Clerk or Deputy Clerk has the authority to initial absentee ballots, thereby ensuring proper verification of voter identification and compliance with the statutory provisions.
2. **Chain of Custody Concerns** – The unauthorized use of a stamp compromises the chain of custody, raising questions about whether the absentee ballots were properly verified and handled according to legal requirements. This could lead to challenges regarding ballot authenticity and voter intent.

The use of a stamp by anyone other than the Clerk or Deputy Clerk to initial absentee ballots is illegal under Wisconsin law. The statutes and case law discussed herein emphasize the critical role of the Clerk or Deputy Clerk in verifying absentee ballots, ensuring proper authentication, and maintaining the integrity of the election process. Any deviation from these prescribed procedures, including the unauthorized use of stamps, threatens the authenticity and security of absentee ballots and risks disenfranchising voters.

To preserve the legitimacy of elections, absentee ballots must be processed strictly in accordance with Wisconsin's election laws, with the Clerk or Deputy Clerk directly involved in initialing the envelopes and ballots.

D. VANDERLEEST'S CLAIMS REGARDING PARTY AFFILIATION

The appointment of "unaffiliated" election inspectors, including Ms. Aerts, who are potentially aligned with a specific political party without full disclosure, constitutes a violation of Wisconsin election laws and undermines the integrity of the election process. This practice could be seen as a deliberate attempt to manipulate the election system and raise serious concerns about impartiality and transparency.

Fraudulent Practices and Violations of Election Law

Under Wisconsin law, any action that corrupts or improperly influences the election process is prohibited. **Wis. Stat. § 12.13(1)(a)** criminalizes fraudulent actions in elections. The misrepresentation of political affiliation by election inspectors who claim

to be “unaffiliated” but are, in fact, affiliated with a political party, constitutes fraudulent conduct. Such misrepresentations are designed to undermine the neutrality of the election process and could create an unfair advantage, violating Wisconsin’s commitment to fair and impartial elections.

Further, Wis. Stat. § 12.13(1)(b) prohibits false statements made by election officials that could affect the outcome of an election. If election inspectors misrepresent their affiliations, they are engaging in a fraudulent practice that violates this statute and the principles of transparency and fairness required for free and fair elections.

Additionally, Wis. Stat. § 12.13(3)(a) criminalizes impersonating or misrepresenting oneself as an election official. Misleading voters about the political affiliations of election inspectors falls within this prohibition, and such actions undermine the integrity of the election system by creating an environment where partisan manipulation can occur unchecked.

Abuse of Process and its Impact on the Election

The appointment of election inspectors, especially those who fail to disclose their political affiliations, constitutes an abuse of the legal process. The election process is meant to be impartial and to serve the public interest of ensuring fair elections. When election inspectors are appointed in a manner that hides their true affiliations, it distorts the purpose of the appointment system, opening the door for partisan influence over the electoral process.

Abuse of process occurs when legal procedures are used in a way that they were never intended, and that is exactly what happens when individuals are improperly appointed as “unaffiliated” election inspectors. The law requires transparency and neutrality in the election process, and any attempt to subvert these requirements through hidden partisan affiliations amounts to an abuse of process. This practice is intended to manipulate the election system for partisan gain, undermining public confidence and trust in the election results.

Impartiality and Procedural Compliance

Wisconsin law mandates that election officers must act impartially and without bias. Wis. Stat. § 7.60(1)(b) emphasizes the need for neutrality among election officials. The appointment of individuals who falsely present themselves as unaffiliated when they are, in fact, partisan is a direct violation of this statute. Such actions breach the legal requirement to ensure impartiality in the election process and lead to an appearance of bias.

The courts in Wisconsin have established that violations of election law procedures can invalidate election results. In *State v. Schaefer*, 133 Wis. 2d 72, 394 N.W.2d 767 (1986), the Wisconsin Supreme Court ruled that deviations from election law procedures, particularly those related to impartiality, can invalidate election results. Similarly, in *Lange v. Election Bd. of Village of Shorewood Hills*, 2001 WI App 236, the court emphasized that any failure to follow election law procedures could create a scenario where the legitimacy of the election process is called into question.

Fraud by Design and the Need for Accountability

The appointment of election inspectors with undisclosed political affiliations reveals a systemic issue that facilitates potential fraud. This is not just a matter of individual misconduct; it is a problem with the design of the election system itself. Wis. Stat. § 12.13(1)(a) prohibits fraudulent actions intended to influence the outcome of an election. The design of the election inspector appointment process must be free from partisan influence to ensure the fairness and legitimacy of elections. When this process is manipulated to favor a particular political party, it constitutes fraud by design—an intentional act to subvert the integrity of the election system.

Further, in *State v. Kiedrowski*, 2001 WI App 253, the court noted that failures to uphold proper election procedures could lead to substantial harm and undermine the fairness of the election process. The improper appointment of election inspectors who do not disclose their political affiliations creates a situation where the public's trust in the election process is eroded, making this a violation of the law and a breach of public confidence in the electoral system.

The improper appointment of "unaffiliated" election inspectors who may, in fact, be politically affiliated violates Wisconsin's election laws and raises significant concerns about the fairness and integrity of the election process. Misrepresentation of political affiliation, abuse of legal processes, and failure to follow procedural safeguards are serious issues that undermine public trust in elections. These actions, designed to skew the election process in favor of a particular political party, constitute fraud by design and abuse of process, and they must be addressed to protect the integrity of Wisconsin's electoral system.

PRAYER FOR RELIEF

WHEREFORE, the complainant respectfully requests the following relief:

1. Deny the Respondent's objection and strike it from the record.
2. Proceed with a full investigation into the alleged election tampering and procedural violations, including a review of all relevant ballots and records from the Green Bay City Council election, District 6, and the recount process.
3. Nullify the election results and recount results based on the findings of this investigation and the violations of Wisconsin election law.
4. Order a new election for Green Bay City Council District 6, ensuring full compliance with the law and the integrity of the election process.
5. Grant any other equitable relief as deemed appropriate by the Commission.

Dated: **February 13, 2025**

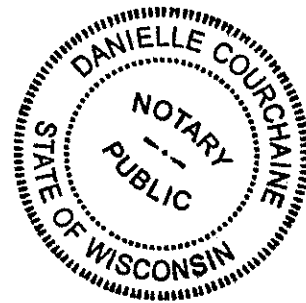
I declare under penalty of false swearing under the law of Wisconsin that the foregoing is true and correct to the best of my knowledge.

For the Complainants:

David VanderLeest

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Notary Public



Danielle Courchaine

SEAL

DATE 2/13/25

My commission expires on 10/24/27