

**STATE OF WISCONSIN  
ELECTIONS COMMISSION**

COMPLAINT FORM

Please provide the following information about yourself:

Name Kenneth L Brown  
Address 610 Main St Suite #400 Racine, WI 53403  
Telephone Number 262-909-3569  
E-mail klbinv@tds.net

**State of Wisconsin  
Before the Elections Commission**

The Complaint of Kenneth L Brown

\_\_\_\_\_, Complainant(s) against  
CEI Stacy Salvo, and Clerk Tara McMenimen, et al., Respondent, whose  
address is 730 Washington Ave, Racine, WI 53403

This complaint is under \_\_\_\_\_ (Insert the applicable sections of law in chs.  
5 to 10 and 12 and other laws relating to elections and election campaigns, other than laws  
relating to campaign financing)

I, Kenneth L Brown, allege that:

on Nov 8th 2022 at Gilmore Middle School in Racine WI, I entered the gymnasium as an observer and  
signed in with Chelf Election Inspector Stacy Salvo. I joined the other observers, standing in the "Box" for  
observers. I was with my partner Theresa Dixon, and we spoke to 3 other observers: Delores Rodriguez,  
Dave Nelson, and Tom Williams. We were advised by them that they had been denied access to chairs and also  
denied access to the nearby restrooms as they were volunteers and not "Employees" and CEI Salvo  
verified that with me. Mrs. Dixon and I asked why and Ms Salvo advised me that it was insurance  
reasons and that the school administration/ principal "refused" to allow for those things. We were both surprised by this response.

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(Set forth in detail the facts that establish probable cause to believe that a violation has occurred. Be as specific as possible as it relates to dates, times, and individuals involved. Also provide the names of individuals who may have information related to the complaint. Use as many separate pages as needed and attach copies of any supporting documentation.)

Date: 3 December 2022

[Signature]  
Complainant's Signature

I, Kenneth L Brown, being first duly sworn, on oath, state that I personally read the above complaint, and that the above allegations are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

[Signature]  
Complainant's Signature

STATE OF WISCONSIN

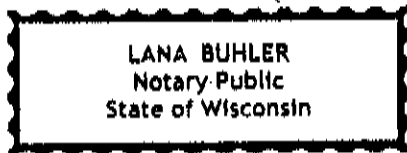
County of Racine,  
(county of notarization)

Sworn to before me this 5<sup>th</sup> day of  
December, 2022.

[Signature]  
(Signature of person authorized to administer oaths)

My commission expires 2/11/25, or is permanent.

Notary Public or \_\_\_\_\_  
(official title if not notary)



Please send this completed form to:

Mail: Wisconsin Elections Commission  
P.O. Box 7984  
Madison, WI 53707-7984

Fax: (608) 267-0500

Email: [elections@wi.gov](mailto:elections@wi.gov)

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I Kenneth L Brown, Attest that:

On Nov 8th 2022 at Gilmore Middle School in Racine WI, I entered the gymnasium as an observer and signed in with Chief Election Inspector Stacy Salvo. I joined the other observers, standing in the "Box" for observers. I was with my partner Theresa Dixon, and we spoke to 3 other observers: Delores Rodriguez, Dave Nelson, and Tom Williams. We were advised by them that they had been denied access to chairs and also denied access to the nearby restrooms as they were volunteers and not "Employees" and CEI Salvo verified that with me. Mrs. Dixon and I asked why; and Ms. Salvo advised us that it was an "insurance reasons" and that the school administration/ principal "refused" to allow for those things. We were both surprised by this response.

Mrs. Dixon and I decided to go to our office to grab six folding chairs and scope out the nearest place where observers could conveniently use a restroom. (Nothing was reasonably close by nearly a half mile to a Citgo gas station, which should not have to provide toilets to Polling observers).

Mrs. Dixon and I were aware that Mrs. Rodriguez, aged 85 and Mr. Nelson, aged 80 had been there since 7:00 am It was approximately 12:15 pm, they'd been on their feet for 5 hours and without access to any facilities. This was just appalling. By this time of day, I had been to 12 of the 15 polling locations around the city, and every single location had chairs for observers, (Most were in public schools), and to the best of my knowledge offered restroom access to observers.

Mrs. Dixon suggested we try calling the Principal of Gilmore School. We did and were patched through to him. We explained the situation, and he was very helpful. He offered to send over a half dozen chairs right away and said that of course our observers would be welcome to use the rest rooms. He also stated he had never been asked about this issue by the Chief Inspector either. We thanked him and satisfied we'd addressed the situation, we proceeded to our next location at Red Apple School.

2 1/2 hours later I followed up on the situation and revisited Gilmore gymnasium, and I observed we had several people in the observation square, still without chairs, I asked them if they were provided access to restrooms, and they replied that they were not. I walked to the furthest part of the gym and placed a phone call to Racine County Clerk Wendy Christensen to ask how best to resolve the situation. A few minutes later Ms. Salvo came towards me and asked that her and I step outside to discuss the situation, I advised her that I had the County Clerk on the call, and I'd be placing the call on speaker show she could hear and comment as needed. I very politely asked why chairs were not set out for observers and that I had contacted the principal and he had them sent down, Ms. Salvo admitted she had refused those chairs. I reiterated that We had also been granted permission to use the restrooms, and that every other location, except Red Apple School had provided both. She insisted this was her final position and dismissed me.

This complaint asks that Ms. Salvo be either made to offer reasonable accommodations to our observers or be heretofore prohibited from acting as CEI for the city of Racine. While those simple accommodations may not be spelled out in Law, these are not unreasonable requests. Furthermore, the fact that the CEI requires observers to sign-in, they are thus recognized as part of the poll/ election process and should be granted the same treatment as the poll workers, sans a paycheck for the service, as they are volunteers.

# Affidavit

UNDER OATH, I STATE THE FOLLOWING:

I, Kenneth L Brown	(DOB) Nov 9 1961	
Name		Age 61

610Main St Suite # 400	Racine, WI 53403	
Address	town, village or city	Zip

- I am an adult resident of the State of Wisconsin.
- I am in sound mind and health.
- I am under no duress to sign this affidavit.

I make this statement of my own free will and it is the truth to the best of my knowledge. I have not been promised anything or threatened in any way. I understand that anything I write may be used in a court of law

**STATEMENT OF AFFIANT:**

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*[Handwritten Signature]*

Signature of Affiant

*5th Dec 2022*

Date

State of Wisconsin

County of Racine

Subscribed and sworn to me on Dec 5th, 2022

*Lana Buhler*

Notary Public/ Court Official

Lana Buhler

Name Printed or Typed

My commission expires 2/11/25

