

8

24 CV 554

STATE OF WISCONSIN CIRCUIT COURT BROWN COUNTY

FILED

Emergency Motion for Relief

APR 12 2024

Clerk of Courts
Brown County, WI

Petitions pray that this court will grant this Emergency Motion and order Green Bay Municipal Clerk Celestine Jeffreys and the Board of Canvassers to allow for a manual recount of votes. Due to the fact Clerk Jeffreys delivered 38 absentee ballots brought to central count, at 7:50pm on election night from the clerk's office, and ballots were previously brought up at around 7:00. It is the belief of the petitioner that 38 people did not bring in ballots between 7 and 7:50 pm. I believe fraud had occurred, and a physical manual count is believed by the petitioner to give a more accurate result. I would like to also inform the court the petitioner bears the burden of paying for the recount. Please see exhibit 1 Recount Petition.

IT IS Further requested the Clerk be ordered to not proceed until all material allowable in the WEC recount check list be provided the Petitioner. see Ex 2

Respectfully submitted:

Steven Campbell

Steven Campbell

"I declare (or certify, verify, or state) under penalty of perjury that the foregoing Complaint is true and correct. Executed on 4/12/2024

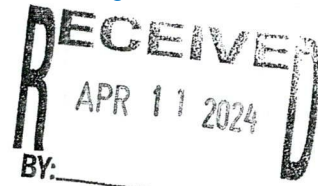
[Handwritten signature]



Ex: 02/09/2026

ID: 245914

EX 1



RECOUNT PETITION

In Re: The Election for City of Green Bay Alderperson, District 6

Verified Petition for Recount

Petitioner Steven Campbell alleges and shows to Green Bay Municipal Clerk Celestine Jeffreys:

- 1. That Petitioner was a candidate for the office of City of Green Bay Alderperson, District 6 in an election held on April 2nd, 2024;
2. The Petitioner is an Aggrieved Party as defined in Wis Statute 9.01(1)(a)5

That Petitioner is informed and believes that a mistake has been committed in Wards 20, 20A, 21, and 22 of the City of Green Bay in the counting and return of votes cast for the office of Alderperson, District 6; and/or

That Petitioner is informed and believes that fraud has been committed in Wards 20, 20A, 21, and 22 of the City of Green Bay in the counting and return of votes cast for the office of Alderperson, District 6; and/or

- 3. That Petitioner is informed and believes that:

"The illegal activity shut down by Lasee, and Prestley's involvement with said activity is grounds for a legal challenge against the election outcome in the 6th"

Wherefore: Petitioner requests a recount of Wards 20, 20A, 21, and 22 of the City of Green Bay.

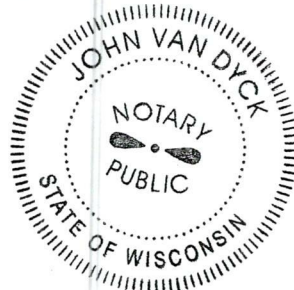
Dated this 11th day of April, 2024.

Signature of Steven Campbell, Petitioner

I, Steven Campbell, being first duly sworn, on oath, state that the matters contained in the above petition are known to me to be true except for those allegations stated on information and belief, which I believe to be true.

Signature of Steven Campbell, Petitioner

Subscribed and sworn to before me this 11th day of April, 2024.



Signature of Notary Public, (or any other person authorized to administer oaths)

My Commission Expires 7/19/2027 (specify expiration date)

Ex 2

Recount Checklist

Hand Counted Paper Ballots

Municipality _____ Date _____
Reporting unit _____ Contest _____

This checklist is designed to facilitate uniform practices and is to be completed simultaneously with the recount process for each reporting unit in the recount.

- Compare and reconcile poll lists.
- Absentee ballot review: number, rejected, defective envelopes, all certificates.
- Verify tamper evident serial number on ballot container matches seal number written on Inspectors' Statement (EL-104) and Ballot Container Certification (EL-101).
- Ballot count.
 - Review ballots marked "rejected," "defective," or "objected to."
 - Separate absentee ballots and drawdown (*May be skipped if the number of absentee ballots equals the number of proper envelopes*).
 - Reconcile the number of ballots with the number of voters.
 - Treatment of excess ballots (*May be skipped if the number of voters equals or exceeds the number of ballots.*)
- Review provisional ballots.
- Hand count paper ballots.
 - Sort ballots by candidate.
 - Create stacks of a fixed number.
 - Tally the stacks using duplicate original tally sheets (EL-105).
- Add in any votes counted separately by other methods.
- Secure the original election materials.
- Prepare canvass statement.
- Prepare minutes for each reporting unit and attach completed checklist to minutes.