

FILED
09-19-2025
Clerk of Circuit Court
Brown County, WI
2025CF001526
Honorable Samantha
Wagner
Branch 4

STATE OF WISCONSIN	CIRCUIT COURT BRANCH	BROWN COUNTY
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STATE OF WISCONSIN Plaintiff,	DA Case No.: 2025BR003192 Assigned DA: David L. Lasee Court Case No.: 25CF	
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vs.

KOU CASSIDY LEE
525 Inverary Court
Green Bay, WI 54155
DOB: 10/15/1977
Sex/Race: Male

Defendant.

CRIMINAL COMPLAINT

For Official Use

Complainant, David L. Lasee, Brown County District Attorney, being first duly sworn on oath, deposes and says that:

Count 1: ELECTION FRAUD - FALSIFY OR DESTROY NOMINATION PAPERS, RECALL PETITIONS, ETC

The above-named defendant, on or about Saturday, January 2, 2024, in the City of Green Bay, Brown County, Wisconsin, did falsify any information in respect to or fraudulently deface or destroy a certificate of nomination, nomination paper, declaration of candidacy or petition for an election, including a recall petition or petition for a referendum; or file or receive for filing a certificate of nomination, nomination paper, declaration of candidacy or any such petition, knowing any part is falsely made, contrary to sec. 12.13(3)(a) Wis. Stats., a Class I Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

Count 2: FELONY FALSE SWEARING

The above-named defendant, on or about Saturday, January 2, 2024, in the City of Green Bay, Brown County, Wisconsin, did make or subscribe a false statement which he did not believe to be true, when the oath or affirmation was authorized or required by law, contrary to sec. 946.32(1)(a) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

Complainant is the District Attorney with the Brown County District Attorney's Office and knows of the above offenses on information and belief based upon:

PROBABLE CAUSE:

The complainant, being duly sworn on oath, swears that he has had the opportunity to review the police reports from Investigator Brad Linzmeier of the Brown County District Attorney's Office, and other documents supporting this complaint referenced herein, which are the types of reports and documents kept in the ordinary course of business, which complainant believes

to be truthful and reliable because they have proven to be truthful and reliable on numerous occasions in the past.

The complainant further asserts that based upon his review of the referenced reports and/or supporting documents, the incidents alleged occurred in the City of Green Bay, Brown County, Wisconsin.

Complainant has reviewed a series of investigative reports from Investigator Brad Linzmeier of the Brown County District Attorneys Office, which indicate, in part:

Investigator Linzmeier was asked to do some follow up investigation into a complaint the Brown County District Attorney's Office received regarding allegations that former Green Bay School Board member **Kou C. Lee (DOB 10/15/77)** misrepresented his residency in violation of Wisconsin Election law on campaign paperwork he submitted declaring his campaign and run for Green Bay School Board position prior to the April 2024 election.

As part of his investigative efforts, Linzmeier gathered a number of relevant campaign documents from the City of Green Bay Clerk's office. One of the documents reviewed by Investigator Linzmeier was the Declaration of Candidacy for School Board Candidates. Linzmeier reviewed this form which has the name and signature of Kou Lee on it. Further, on that form, Lee indicates, upon being duly sworn, that at the time of filing the Declaration of Candidacy, he will meet all the qualifications for the candidacy of Green Bay School Board, including the residency requirement, and he specifically indicates that his present address of residence for voting purposes is 2027 Enderby Lane in the City of Green Bay, WI. It appears this form was witnessed and sworn to before Green Bay City Clerk Celestine Jeffreys as it includes her signature and the date of January 2, 2024.

It should be noted that Lee likewise used the 2027 Enderby Lane address on several other campaign documents. When Lee circulated his nomination papers, the address he lists on the top of the nomination paper form is 2027 Enderby Lane. Further, Lee signed the Certification of Circulator on 17 pages of nomination papers that were filed with the Green Bay Clerk's Office on January 2, 2024. The Certification of Circulator required the circulator to include his/her address. For each of the pages circulated by Lee, he indicates his address as 2027 Enderby Lane in the City of Green Bay. Immediately following that assertion, the following disclaimer can be found at the bottom of the nomination form:

"I further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. §6.03. I personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I intend to support this candidate. I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a)."

On July 17, 2025, Investigator Linzmeier responded to 2025 Enderby Lane in the City of Green Bay and met with the owner of this duplex, CSL, an adult male. CSL resides at 2025 Enderby, the other half of his duplex address is 2027 Enderby Lane, which is the address used by Lee on his campaign paperwork. Investigator Linzmeier met with CSL and his adult son, LL, who

was present, but does not reside at this location. Investigator Linzmeier explained the reason for his visit and asked about who CSL had rented the 2027 Enderby unit to in the past two years. CSL and LL explained that back in 2021 a relative (SL) lived at 2027 Enderby, LL said it was his stepmother. They explained that she passed away in 2021, that side of the duplex remained empty until early 2022 when CSL's other adult son, VL, moved into that side of the duplex and he still lives there presently with his wife, PT. CSL and LL explained that VL had been living with CSL at the 2025 Enderby side when SL passed and he eventually moved into the 2027 Enderby side, CSL said it would have been in 2022. In checking police data base, Investigator Linzmeier located a police call on March 17, 2022, and at that time both VL and PT were living at the 2027 Enderby Lane address.

Investigator Linzmeier asked CSL about his association with Kou Lee. CSL stated they were not related even though they had the same last name. CSL described Kou just as a friend who he has known for a couple years. LL told Investigator Linzmeier that he does not know Kou Lee and was surprised and confused when he saw his father and brother's address listed in the story as Kou Lee's address when the school board story came public in May 2025.

CSL informed Investigator Linzmeier that Kou Lee never resided at the 2027 Enderby Lane address, that his son VL has been living at that address since 2022. CSL said the only conversation he's ever had with Kou Lee about living at this address was back in 2021 or possibly early 2022, shortly after SL passed away. CSL said at that time, Kou Lee came to his residence and inquired on possibly renting 2027 Enderby. CSL said he told him right now no one is living there and that he would rent to him. CSL said Kou Lee mentioned he just wanted to put a deposit down to reserve it, but CSL said he wouldn't do that. CSL said Kou Lee never followed up with him after that initial conversation and he never had any further discussions with Kou Lee about renting that unit. CSL said his son VL then moved in shortly after that conversation he had with Kou Lee and VL has occupied it since 2022. CSL confirmed for me that the conversation with Kou Lee about moving in there was during that time frame between 2021 when SL passed away and prior to 2022 when his son VL moved in because that was the time frame the unit was vacant.

LL mentioned he felt Kou Lee took advantage of his father by listing this address as a place of residency when in fact he never did reside here. CSL added again that it was just a brief conversation he had years ago with Kou Lee about him possibly moving in here, but nothing formal or further discussions of it ever happened again.

On July 28, 2025, Investigator Linzmeier met with VL at his residence, 2027 Enderby Lane, in the City of Green Bay. VL confirmed that he moved into 2027 Enderby Lane in January of 2022 and has resided there ever since. VL confirmed he was aware from speaking with his father (CSL) that a Kou Lee had inquired about renting 2027 Enderby Lane prior to VL moving into the residence in 2022. VL said that conversation would have been in late 2021 and Kou Lee never followed through with renting the duplex so VL moved into 2027 Enderby in January of 2022. VL said that conversation in 2021 was the only time he is aware of that Kou Lee had inquired about renting that property. VL said Kou Lee is not related to his family and he does not even know him. This information is consistent with what CSL and LL had previously told Investigator Linzmeier.

VL said press reporters came to his house and asked him about the information of Kou Lee living at his address. VL said this was confusing and upset him that someone had used his

address inappropriately. He said he spoke with CSL and he was also confused on why Kou Lee had used that address as his place of residence on his campaign papers. VL said he is upset, after looking back and into what Kou Lee did with inappropriately listing this as his address, that he felt Kou Lee was being fraudulent and took advantage of CSL

On July 23, 2025, Investigator Linzmeier made contact with a GEW, an adult male, at his residence located at 517 Inverary Court in Hobart, WI. Investigator Linzmeier had received information from the initial complaint that GEW had emailed Green Bay City Clerk Celestine Jeffreys in June of 2024 with his concerns that recently elected School Board Member Kou Lee may not be residing within the school district as required.

GEW explained that Kou Lee and his family moved into the house next door to him, 525 Inverary Court in Hobart, in 2015. GEW said in 2022, he had seen that Kou Lee ran in the Democratic primary for US Senate election race for the November 2022 election. Kou Lee was eliminated in that primary and the Democratic nominee was Mandela Barnes.

GEW said he later saw a media report that Kou Lee was a candidate running for Green Bay School Board in the April 2024 school board election. GEW said this initially struck him as odd with Kou Lee living in the Pulaski School District and running for a school board in a district where he didn't reside.

GEW said shortly after the April 2024 Green Bay School Board elections where Kou Lee was elected, he contacted Green Bay City Clerk's office with his concerns that Lee did not reside within the Green Bay School District, as he has been living next door to him in Hobart since 2015.

GEW explained what he observed in respect to the daily activities at Kou Lee's residence next door that led him to believe Kou Lee was still residing at the residence next to him, 525 Inverary Court, during the candidacy and election time frame of April 2024. GEW said during this time period of December 2023 through to the April election in 2024, he would routinely see Kou Lee come and go from the 525 Inverary address as normal. GEW said he would routinely observe Kou Lee's children getting picked up and dropped off by the Pulaski School District bus in front of the house on Inverary Court. He said garbage was brought out and in as normal, GEW explained from his neighborly observations of Kou Lee and his family's activities during that time frame, it all gave the appearance of him living there as it has for the past 10 years.

Investigator Linzmeier reviewed the real estate property tax bill for year 2024 for 525 Inverary Court, Brown County, Town of Hobart. The bill is addressed to Kou Lee and Janey Lee at 525 Inverary Ct. On the tax bill, it indicates a \$203.34 Lottery Credit was applied to this property. In order to qualify for this Wisconsin Lottery tax credit, property owners need to be the recorded owner of said property and the property must also be the owner's primary residence.

On July 24, 2025, Investigator Linzmeier made contact with School Resource Officer Nikodem from the Pulaski Police Department, who is currently assigned to the Pulaski School District as an SRO. Investigator Linzmeier inquired of Officer Nikodem about the contact information, particularly the address and phone number, that was listed with the Pulaski School District for Kou Lee for the 2024 and 2025 school years. Kou Lee has four children enrolled in the Pulaski

School District. Officer Nickodem informed Investigator Linzmeier that the school district had an address of 525 Inverary Cir, Oneida WI, listed for Kou Lee.

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on
09/19/25

Electronically Signed By:

Dana J. Johnson

Deputy District Attorney

State Bar #: 1001712

Electronically Signed By:

David L. Lasee

Complainant