

FILED

08-25-2025

Anna Maria Hodges

Clerk of Circuit Court

2025CF003952

Honorable Kristy Yang-47

Branch 47

STATE OF WISCONSIN**CIRCUIT COURT****MILWAUKEE COUNTY****STATE OF WISCONSIN**

Plaintiff,

DA Case No.: 2025ML021290

Court Case No.:

vs.

CRIMINAL COMPLAINT

PATTERSON, MARCEY P
4700 WEST DEER RUN DRIVE #202
BROWN DEER, WI 53209
DOB: 08/24/1980

Defendant(s).*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

Count 1: ELECTION FRAUD - VOTING BY DISQUALIFIED PERSON

The above-named defendant between 08/14/2018 - 04-01-2025, at 3600 West Hope Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did intentionally vote at an election when she did not have the necessary elector qualifications, to wit, she did not have the necessary residency requirements to cast a ballot, contrary to sec. 12.13(1)(a), 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant 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.

Probable Cause:

Complainant is a City of Milwaukee Police Detective and bases this complaint upon her own investigation, which includes the statements of citizen witnesses as well as the review of documentary evidence, as well as the investigation of fellow law enforcement, which Complainant believes to be truthful and reliable as Complainant has relied upon similar investigations in the past and found them truthful and reliable and because Complainant is aware that such investigations are conducted in the ordinary course of the official work of law enforcement.

OVERVIEW

Marcey Patterson was employed by the City of Milwaukee Police Department (MPD) as the MPD Community Relations Engagement and Recruitment Director. She was hired on May 2, 2022. In her role as a City of Milwaukee employee, Patterson was eligible to receive a 3% residency incentive increase in her pay, if she lived in the City of Milwaukee. She received that residency incentive until June 16, 2025, when she amended her residency documents with MPD to reflect that she did not live in the City of Milwaukee. In fact, Patterson had not lived in the City since at least March of 2018.

Despite not being a resident of Milwaukee, Patterson repeatedly voted in City of Milwaukee elections, despite lacking the necessary residency qualifications. Between March of 2018 and April of 2025, Patterson voted in the City of Milwaukee in 12 separate elections. During all of those elections, she was living outside the City of Milwaukee. Further, on June 29, 2024, Patterson submitted a Voter Registration Application to the Milwaukee Election Commission. In that application, she listed her address as 4312 North 40th Street, in the City of Milwaukee. This was not true. At that time, she was living in Brown Deer.

RELEVANT WISCONSIN STATUTORY PROVISIONS

Complainant is informed by the Milwaukee County District Attorney's Office that the following Wisconsin statutory provisions inform this investigation and prosecution.

Wisconsin Statutes §12.13(1) provides: Whoever intentionally does any of the following violates this chapter:

- (a) Votes at any election or meeting if that person does not have the necessary elector qualifications and residence requirements.
- (b) Falsely procures registration or makes false statements to the municipal clerk, board of election commissioners or any other election official whether or not under oath.

Wisconsin Statutes § 6.02(1) provides:

6.02(1) Every U.S. citizen age 18 or older who has resided in an election district or ward for 28 days before any election where the citizen offers to vote is an eligible elector.

PATTERSON INAPPROPRIATELY RECEIVED INCREASED PAY DUE TO FALSE REPRESENTATIONS ABOUT HER RESIDENCY

In June of 2025, it came to the attention of MPD that Marcey Patterson, the Community Relations Engagement and Recruitment Director, had been collecting a 3% residency incentive since her hire in May of 2022. Complainant knows that the 3% residency incentive is a 3% boost in pay for those individuals living within the City of Milwaukee. When Patterson was originally hired in May of 2022, she filed a Change in Registered Information form. In that form, she indicated that she currently resided at 4312 North 40th Street in the City and County of Milwaukee.

Prior to 2018, Patterson lived at 4312 North 40th Street, in the City and County of Milwaukee. This is the residence of her mother. Further, Patterson is part-owner of the home and is listed on the deed. She had resided at that location for multiple years and still received mail at that location. Despite that, North 40th Street is not her residence. In June of 2025, Patterson was confronted with the fact that she was not living within the City. Patterson filed new change in registered information forms on June 16, 2025. In one form, she indicated that, on March 1, 2018, she moved from the North 40th Street residence to 6574 North Sidney Place in the City of Glendale. One the second form, she indicated that, on March 1, 2024, she moved from the Glendale residence to 4700 West Deer Run Drive in the Village of Brown Deer. These forms, filled out and submitted by Patterson, established that for the entirety of her employment at MPD she did not reside within in the City of Milwaukee.

During the time of her employment, from May of 2022 until July of 2025, Patterson received the 3% residency incentive on her pay at MPD. Complainant reviewed Patterson's personnel file and her background investigation. Those records showed that, when Patterson was first hired in May of 2022, she listed her current residence as the North 40th Street residence on multiple forms. During a background interview on April 11, 2022, Patterson indicated that she had two residences, the North 40th Street residence in Milwaukee and the Sidney Place residence in Glendale. However, she stated to the investigator that the Milwaukee address was her primary residence. Despite that, on April 4, 2022, Patterson filled out a Civil Personal History Questionnaire. In that questionnaire, Paterson listed that her present address was the Sidney Place residence. However, she listed that residence as in the City of Milwaukee. On that questionnaire, she listed that she lived at the Sidney Place address from June of 2018 until the present (April of 2022). She listed that she last lived at the North 40th Street address from January 2012 to June 2018. Further, in April of 2022, MPD's Human Resources Administrator

sent Patterson an email regarding the discrepancy between the address on her questionnaire (Sidney Place) and the address she provided to HR (North 40th). Patterson told HR that the North 40th was her home address.

Complainant also interviewed HH, the MPD Chief of Staff. HH recalled speaking with Patterson in 2024 when her position was reclassified. She remembered telling Patterson that she was excited for her to get higher compensation plus the additional 3% for residency.

When confronted about living out of the City, Patterson denied knowing about the 3% incentive when she started at MPD. In an email to payroll, she stated she was made aware of the incentive would be included when her position was reclassified approximately one year prior. Patterson stated that she thought that residency within the City meant you lived within 15 miles of the City of Milwaukee border, as that was the incentive policy in the Mayor's office where Patterson previously worked. As part of this investigation, Complainant spoke with ND, the Chief of Staff for the Mayor, and PD, his office manager. Both stated that their residency did not include 15 miles from the City border in the Mayor's office. Both stated that everyone who works for the Mayor lives in the actual City of Milwaukee. PD, who had worked for the Mayor's office since 2011, stated that in her time doing payroll that there were no employees that lived outside the City of Milwaukee.

Based on the information above, Complainant believes the evidence shows that Patterson was aware of the 3% incentive and knew that she did not live in the City of Milwaukee. Despite that, Patterson listed the North 40th Street residence as her residence and thus collected a 3% residency incentive that she did not qualify for. As a result, during her employment at MPD, Patterson received \$8,226.78 in overpayments due to the 3% incentive.

PATTERSON REGISTERED TO VOTE AND VOTED USING AN ADDRESS SHE DID NOT LIVE AT

As part of this investigation, Complainant received copies of records from the City of Milwaukee Election Commission relating to Patterson's voting history. This included Patterson's most recent election registration application, as well as a copy of the poll books containing her signatures in the April 2025 election and November 2024 election. Those records reflected that, since 2006, Patterson has consistently been voting at the Samuel Clemens School, located at 3600 West Hope Avenue, in the City and County of Milwaukee. This is the designated polling location for 4312 North 40th Street, in the City and County of Milwaukee.

During the investigation, Complainant obtained a copy of Patterson's most recent Wisconsin Voter Registration Application. She filed out that application on June 29, 2024. This application was submitted to an election official. In that application, she listed her residence as follows:

The Address Where You Live your residential voting address, which cannot be a P.O. Box		4
Street Address <u>4312 N. 40th</u> Apt/Room # <u></u>		
City/Town/Village of <u>Milwaukee</u> WI Zip <u>53216</u>		
Mailing Municipality (if different) <u>Milwaukee</u>		
Are you military or permanent overseas voter? <input type="checkbox"/> Military <input type="checkbox"/> Permanent Overseas		
If you do not have a street address, please use the map on the back of this form		

As part of that application, the voter must check a box relating to their residency. That box states:

Qualifications please check each box if YOU:	<p>If you cannot check every box, do NOT complete this form</p> <p><input checked="" type="checkbox"/> Are a citizen of the United States</p> <p><input checked="" type="checkbox"/> Have resided at the address provided below for at least 28 consecutive days prior to the election and do not currently intend to move</p>
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Further, the application requires that the voter provide proof of residency. The application indicates that Patterson provided a copy of her Wisconsin Driver's License to prove her residence. Patterson then signed a certification that stated:

Signature and Certification	<p>9</p> <p>By signing below, I hereby certify that, to the best of my knowledge, I am a qualified elector, having resided at the above residential address for at least 28 consecutive days immediately preceding this election, that I have no present intent to move, and I have not voted in this election. I also certify that I am not otherwise disqualified from voting and that all statements on this form are true and correct. If I have provided false information, I may be subject to fine or imprisonment under State and Federal Laws</p> <p></p> <p>Voter Signature</p>	<p>6.29.24</p> <p>Today's Date</p>
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As noted above, this was a false statement. Patterson did not reside at the North 40th Street address and had not resided there for several years. By her own admissions in the residence forms filled with MPD, Patterson had not lived in the City of Milwaukee since 2018. By making these assertions, Patterson falsely procured registration in Milwaukee by making false statements to an election official.

In addition to falsely registering, Patterson voted in multiple elections while lacking the necessary residency qualifications. Complainant reviewed records from the City of Milwaukee Elections Commission, as well as the MyVote.wi.gov website.¹ Those records showed that, since March of 2018 when she moved out of the City of Milwaukee, Patterson has voted in 12 elections at a City of Milwaukee Polling location. Those records showed that Patterson voted in the following elections:

Election Date	In Person versus Absentee	Polling Place
08/14/18	Absentee	Samuel Clemens School
11/6/18	Absentee	Samuel Clemens School
02/18/20	In Person	Samuel Clemens School
04/07/20	Absentee	Samuel Clemens School
08/11/20	Absentee	Samuel Clemens School
11/03/20	Absentee	Samuel Clemens School
04/05/22	In Person	Samuel Clemens School
08/09/22	In Person	Samuel Clemens School
11/08/22	Absentee	Samuel Clemens School
02/21/23	In Person	Samuel Clemens School
11/05/24	In Person	Samuel Clemens School
04/01/25	In Person	Samuel Clemens School

¹ Complainant is aware that the MyVote.wi.gov website is a repository of voter information, including voting history. It is a site maintained by the State of Wisconsin Elections Commission. Complainant has relied upon the information contained on this site in the past and found it truthful and reliable and kept in the ordinary course of the official work of the Election Commission.

In particular, Complainant was able to review a copy of the signed pollbook used at the Samuel Clemens polling location (3600 West Hope Ave, City and County of Milwaukee) for the November 2024 election and the April 2025 election. Those pollbooks both show Patterson's name, signature, address, and voter number for the November 2024 and April 2025 elections. A review of the MyVote website further shows that Patterson voted at the Samuel Clemens polling location in both of those elections on November 5, 2024, and on April 1, 2025. At the time of each of those elections, Patterson lacked the necessary residency requirements to vote. During both of those elections, Patterson was residing in Brown Deer. As such, her appropriate voting location would've been a Brown Deer location.

INTERVIEW WITH PATTERSON

On July 16, 2025, Complainant interviewed Patterson. Patterson was shown the April 4, 2022, personal history questionnaire and agreed that she filled it out. When shown where she'd listed the North 40th Street residence, Patterson stated that was the residence she considered her permanent residence. However, she stated that she does not sleep at the North 40th Street residence at all. She then stated that her mother is 80 years old, so she does have occasional overnight visits.

When asked where she sleeps, Patterson said the Brown Deer address is her address where she lives, where she sleeps, where she wakes up, where she leaves for work, and where her son is. But she stated the North 40th is a permanent address she uses. Complainant asked Patterson whether she was staying at the North 40th Street address when she listed the Sidney Place residence. Patterson stated that she would occasionally stay at the North 40th residence to help her mother, but where she "laid her head at night was on Sidney Place."

Complainant asked Patterson where she was living when she was hired by MPD. Patterson stated the Sidney Place residence. When asked about the 3% incentive, Patterson stated she wasn't aware of it until the recent reclassification of her position approximately one year and a half previous. She stated that she thought living within 15 miles of the City was sufficient. When asked where she learned about the 15 mile rule, she stated that she overhead people talking about it when the new residence rules were being discussed. Complainant knows that the 3% residency incentive never included a 15 mile rule for non-sworn employees.

Complainant also asked Patterson about her voting history. Patterson admitted that she registered to vote using the North 40th Street residence and that she'd been voting since at least 2016 at the Samuel Clemens school in the City of Milwaukee. She stated she did it because the North 40th address is on her driver's license.

CONCLUSION

Based on the totality of circumstances, Complainant believes that Patterson was not honest about her residence throughout her time at MPD. She reported multiple times that she lived at the North 40th Street address. She specifically told her background investigator that she had two residences (North 40th and Sidney Place), but that the North 40th was her primary residence. This was not true. She had not lived there in almost 4 years at the time of her hiring. Despite never living in the City of Milwaukee during her employment at MPD, she received the 3% residency incentive throughout her time. At the very least, by her own admissions, Patterson was aware of the 3% incentive when her position was reclassified approximately one year previous. Despite that, she did not correct her address with MPD. She did not inform anyone that she lived outside the City. She continued collecting the 3% incentive she was not eligible to receive. As a result, during her employment at MPD, Patterson received \$8,226.78 in overpayments due to the 3% incentive. MPD would not have authorized these payments but for Patterson's false assertions regarding her residence.

Further, while residing outside of the City of Milwaukee, Patterson repeatedly voted in City of Milwaukee elections. She registered to vote using the North 40th residence where she did not live. She voted multiple times in the City, including during the November 2024 and April 2025 elections. At the times of these elections and the time she registered to vote, she did not live in the City of Milwaukee. She made a false statement to the election official by registering with an address she did not live it. She voted multiple times while lacking the necessary residency qualifications.

****End of Complaint****

Electronic Filing Notice:

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Matthew Richard Westphal.
ADA Assigned Email Address: Matthew.Westphal@da.wi.gov

Subscribed and sworn to before me on 08/22/25

Electronically Signed By:

Matthew Richard Westphal

Assistant District Attorney

State Bar #: 1071292

Electronically Signed By:

Detective RoseMarie Galindo

Complainant