

**FILED**  
**03-18-2026**  
**Clerk of Circuit Court**  
**Waukesha County**  
**2026CV000504**

**STATE OF WISCONSIN    CIRCUIT COURT    WAUKESHA COUNTY**

JEFFERSON DAVIS,  
W169 N8630 Sheridan Drive  
Menomonee Falls WI, 53051

Plaintiff,

v.

SHEILA WITT  
N51W14266 Lancaster Avenue  
Menomonee Falls, WI 53051

Case No. \_\_\_\_\_

Case Code: 30106

and

NATHAN GREENLEAF  
W125N6844 Ruby Road  
Menomonee Falls, WI 53051

and

JOHN/JANE DOE 1,  
whose true identity is unknown and who used the name  
"Danielle Walsh" on Facebook,

Defendants.

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**SUMMONS**

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**STATE OF WISCONSIN:**

To the above-named Defendants:

You are hereby notified that the Plaintiff, Jefferson Davis, has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within forty-five (45) days of receiving this Summons, you must respond with a written Answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the

Complaint. The court may reject or disregard an Answer that does not follow the requirements of the statutes. The Answer must be sent or delivered to the Court, whose address is: **Clerk of Circuit Court, Monica Paz, Waukesha County Courthouse, 515 W. Moreland Boulevard, Waukesha, Wisconsin 53188**, and to Plaintiff's attorneys, whose address is **The Law Office of Kevin M. Scott LLC, 2665 S. Moorland Road, Suite 200, New Berlin, Wisconsin 53151**. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is or may be incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future and may also be enforced by garnishment or seizure of property.

If you require assistance or auxiliary aids or services because of a disability, call **608-266-4311 (TDD 608-266-4625)**, and ask for the Court ADA Coordinator.

Dated at New Berlin, Wisconsin, this 18th day of March, 2026.

*Electronically filed by Kevin M. Scott, Esq.*  
Kevin M. Scott (SBN 1036825)  
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**STATE OF WISCONSIN      CIRCUIT COURT      WAUKESHA COUNTY**

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Plaintiff,

Case No. \_\_\_\_\_

v.

Case Code: 30106

SHEILA WITT, et al.

Defendants.

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**COMPLAINT**

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**INTRODUCTION**

This action arises from a coordinated and deliberate campaign of false accusations launched against Plaintiff during a contested election for the Menomonee Falls School Board. In the midst of that campaign, Defendants took to Facebook and other public online forums and began publicly accusing Plaintiff Jefferson Davis of deeply damaging misconduct, including racist behavior toward children, sexual misconduct involving minors, dishonesty toward local businesses, and other serious wrongdoing.

These were not offhand remarks or expressions of political disagreement. They were not hyperbole. Defendants presented their accusations as statements of fact. In doing so, they repeatedly asserted that Plaintiff had engaged in specific acts of misconduct, at times claiming personal knowledge of events that never occurred and at other times repeating unverified allegations as though they were established truths.

The accusations were false.

Plaintiff did not make racist remarks toward students, coaches, parents, or spectators. Plaintiff did not engage in sexual harassment or any form of misconduct involving minors. Plaintiff was never banned from officiating athletic contests because of sexist remarks. Plaintiff did not lie to local businesses in connection with his campaign.

Yet Defendants published these accusations anyway—publicly, repeatedly, and without any legitimate basis. They did so either knowing their statements were false or with a reckless disregard for the truth. In a small community, accusations of racism toward children and sexual misconduct involving minors are among the most serious that can be made. Defendants chose to make them anyway.

This case reflects a growing and troubling reality. Social media has made it easier than ever to level devastating accusations against another person with the click of a button. It has also fostered a culture in which some individuals—shielded by distance, anonymity, or the perceived informality of online discourse—behave as “keyboard warriors,” launching attacks they would never make face-to-face and without regard for the consequences.

But there are consequences.

While the platforms that host such speech may enjoy legal protections, the individuals who exploit those platforms to spread false and damaging accusations do not. The law has never recognized a right to destroy another person’s reputation through knowingly false statements, and it does not recognize such a right simply because those statements are made online.

The conduct alleged here goes beyond mere incivility. It represents the weaponization of false accusations—of racism and misconduct involving children—for

political purposes. Left unchecked, such conduct creates a chilling effect on civic participation, deterring qualified and community-minded individuals from seeking public office out of fear that they, too, will be subjected to baseless and vicious attacks.

That result is incompatible with a functioning civil society. The law provides a remedy, and this case seeks to enforce it.

As a direct and foreseeable result of Defendants' conduct, Plaintiff has suffered substantial reputational harm, emotional distress, and other damages.

### **PARTIES**

1. Plaintiff Jefferson Davis is an adult resident of Wisconsin residing at W169 N8630 Sheridan Drive, Menomonee Falls Wisconsin.

2. Defendant Sheila Witt is an adult resident of Menomonee Falls, Wisconsin with a last known address of N51W14266 Lancaster Avenue, Menomonee Falls, Wisconsin.

3. Defendant Nathan Greenleaf is an adult resident of Menomonee Falls, Wisconsin with a last known address of W125N6844 Ruby Road, Menomonee Falls, Wisconsin.

4. Defendant John/Jane Doe 1 is an individual whose true identity is presently unknown, who used the name "Danielle Walsh" as a pseudonym on Facebook, and who, upon information and belief, resides in Wisconsin and published statements concerning Plaintiff as described herein. Plaintiff will amend this Complaint if necessary to allege Defendant's true name when it is ascertained.

### **JURISDICTION AND VENUE**

5. This Court has jurisdiction pursuant to Wis. Stat. § 801.04 and the Wisconsin Constitution.

6. Venue is proper in Waukesha County because the defamatory statements were published by and to residents of Menomonee Falls and the events giving rise to Plaintiff's claims occurred in this county.

### **FACTUAL BACKGROUND**

7. Plaintiff has lived and worked in the Menomonee Falls community for many years.

8. Plaintiff has served as an official at youth sporting events sanctioned by the WIAA.

9. Plaintiff has developed a reputation in the community as someone who volunteers his time to youth athletics and civic activities.

10. In 2026, Plaintiff announced his candidacy for the Menomonee Falls School Board.

11. Shortly after Plaintiff announced his candidacy, Defendants began publishing statements falsely accusing Plaintiff of serious misconduct.

#### **Defamatory Statements by Defendant Sheila Witt**

12. Defendant Sheila Witt published numerous statements concerning Plaintiff on Facebook.

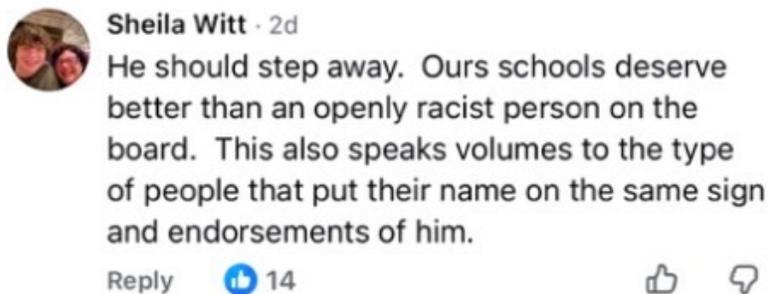
13. Defendant Witt wrote the following about Plaintiff on or about March 5, 2026:



14. Defendant Witt wrote the following about Plaintiff on March 6, 2026:



15. Defendant Witt also wrote on or about March 5, 2026:



16. Defendant Witt wrote the following about Plaintiff on March 7, 2026:



Sheila Witt · 1d · Author

Nathan Greenleaf 100 not only the racism there are claims of sexual harassment of children! He is lying to local businesses to get signs up by saying they are putting up signs to promote the district instead of campaign signs. They did it to fiddleheads too. He hasn't changed at all.

Reply



17. These statements falsely accused Plaintiff of racist misconduct, sexual misconduct involving children, and dishonest behavior.

18. None of these accusations have even the slightest shred of truth to them.

19. Defendant Witt's statements were false, defamatory, and presented as assertions of fact to third parties. By accusing Plaintiff of racist misconduct, sexual misconduct involving children, and dishonest behavior, Defendant Witt conveyed that Plaintiff engaged in serious moral, criminal, and professional wrongdoing, which would be understood by reasonable readers as factual claims rather than mere opinion or rhetorical hyperbole.

20. Defendant Witt's false accusations directly impugn Plaintiff's character, integrity, and fitness in both his personal and professional life. Allegations of sexual misconduct involving children and dishonest conduct inherently suggest criminal and unethical behavior, while accusations of racist misconduct undermine Plaintiff's ability to fairly and impartially perform his duties in positions of trust. Such statements are of a nature that would tend to deter others from associating or doing business with Plaintiff.

21. By publishing false statements imputing criminal conduct, moral turpitude, and professional unfitness to Plaintiff, Defendant Witt's statements constitute defamation per se. These statements are so inherently harmful that they give rise to a presumption of damages, as they naturally and necessarily expose Plaintiff to public hatred, contempt, ridicule, and reputational harm.

22. Defendant Witt's statements were motivated by her hostility toward Plaintiff's openly conservative political views and were made with actual malice, in that she either knew her accusations were false or acted with reckless disregard for their truth or falsity.

### **Defamatory Statements by Defendant Nathan Greenleaf**

24. Defendant Nathan Greenleaf published false statements about Plaintiff on Facebook in March 2026, accusing him of racist misconduct.

25. Defendant Greenleaf wrote the following in reference to Plaintiff in March of 2026:



#### **All comments** ▾



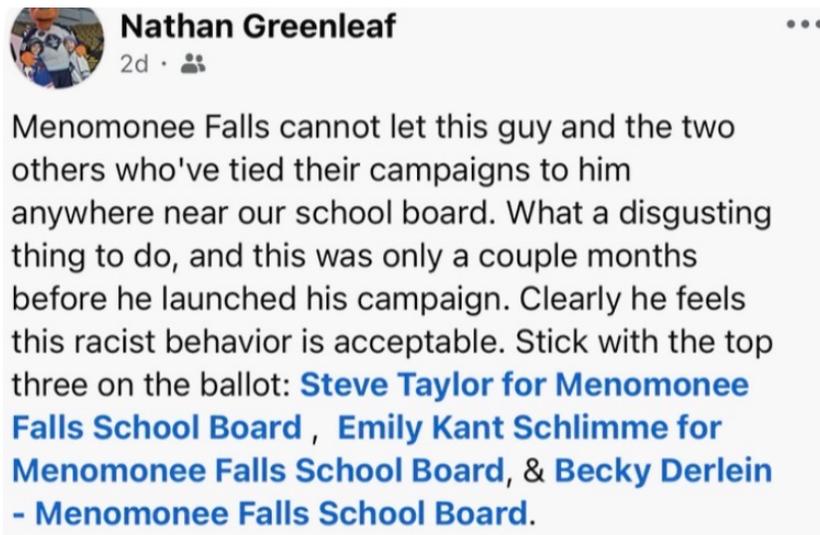
**Nathan Greenleaf** · 1d

**Associating your campaign candidate openly uses racist language in front of children at middle school sanctioned events while in a position of authority as a WIAA referee is abhorrent. As someone involved in youth sport yourself I expect to see a statement condemning such behavior and hope you distance yourself from his campaign.**

**Reply**



26. Defendant Greenleaf also wrote the following on March 26, 2026:



27. Greenleaf was referring to a report made to the Wisconsin Interscholastic Athletic Association by a man named Brian Kirt in which Mr. Kirt falsely accused Plaintiff of making a racist statement.

28. These statements asserted that Plaintiff engaged in racist misconduct toward officials, parents, and children while officiating school sporting events.

29. These statements were completely false, and Greenleaf is not excused from amplifying and piling on further false accusations that Plaintiff engaged in racist misconduct.

30. Greenleaf's statements directly impugn Plaintiff's fitness, integrity, and impartiality in his role as a referee, a position that requires fairness, neutrality, and adherence to established rules and standards. Accusations that a referee engaged in racially biased conduct inherently call into question the referee's ability to perform his duties and are incompatible with continued participation in such officiating roles.

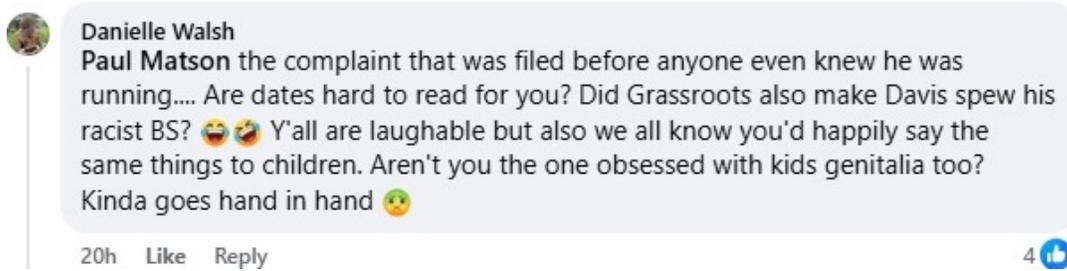
31. By falsely attributing racially discriminatory conduct to Plaintiff in the context of his professional duties, Defendant's statements constitute defamation per se.

Such statements naturally and necessarily tend to harm Plaintiff's reputation and expose him to public contempt, ridicule, and loss of professional opportunities, thereby entitling Plaintiff to recover damages without the need to plead or prove special damages.

**Defamatory Statements by Defendant Danielle Walsh (a pseudonym)**

32. Defendant John/Jane Doe 1 (hereinafter referred to by pseudonym "Walsh") also published statements concerning Plaintiff on Facebook.

33. Defendant Walsh wrote:



43. Walsh's statements falsely accuse Plaintiff of engaging in racist conduct, making inappropriate statements to children, and possessing an improper and deviant interest in minors. These statements were presented to third parties as factual assertions concerning Plaintiff's character and conduct and were understood by reasonable readers as describing actual behavior by Plaintiff.

44. Accusations that an individual is "obsessed with kids genitalia" inherently impute sexual misconduct involving minors and suggest criminal and morally reprehensible behavior of the most serious kind. Such statements go far beyond mere insult or opinion and instead convey concrete and highly damaging assertions of fact that would naturally provoke outrage, condemnation, and ostracism from the community.

45. Walsh's statements directly impugn Plaintiff's character, integrity, and fitness to participate in any position of trust, including his role as a referee. Allegations of this nature are incompatible with continued participation in activities involving public trust or contact with minors and would deter others from associating with, employing, or otherwise engaging Plaintiff.

46. By falsely attributing to Plaintiff conduct constituting criminal sexual misconduct, moral turpitude, and professional unfitness, Walsh's statements constitute defamation per se. Such statements are inherently and obviously harmful, as they necessarily expose Plaintiff to public hatred, contempt, and ridicule, and entitle Plaintiff to recover damages without the need to plead or prove special damages.

47. Danielle Walsh is a name used on Facebook by an individual whose true identity is presently unknown. Upon information and belief, "Danielle Walsh" is a pseudonym used by Defendant John/Jane Doe 1. Plaintiff will amend this Complaint if necessary to allege the Defendant's true name when ascertained.

**Additional Factual Allegations  
Concerning falsity and recklessness**

48. The accusations published by Defendants rest on the central premise that Plaintiff uttered racist remarks while officiating a youth basketball game.

49. That premise is categorically false.

50. At no time during that game did Plaintiff make any racist remark.

51. Plaintiff did not make any racially insensitive comment to any coach, player, spectator, or other person present.

52. Plaintiff did not direct any remark referencing race toward any individual at that event.

53. Plaintiff did not use racist language in front of children at a middle school sporting event.

54. Plaintiff did not use racist language at any WIAA-sanctioned event.

55. Nor has Plaintiff ever engaged in racist conduct toward students, coaches, parents, or spectators at any time.

56. Plaintiff has never engaged in sexual harassment of children or minors.

57. Plaintiff has never made sexist remarks to female student athletes.

58. The statements published by Defendants asserting otherwise are false in every respect.

59. Defendants had no reliable, credible, or first-hand basis for asserting that Plaintiff engaged in any of the conduct they described.

60. Rather than verify the truth of these serious allegations, Defendants repeated and amplified them publicly to third parties.

61. In doing so, Defendants escalated their accusations from an alleged isolated remark to sweeping claims of racist misconduct and, ultimately, to allegations of sexual misconduct involving children.

62. These accusations were not minor or trivial; they were extraordinarily serious and of a nature that would shock the conscience of any reasonable reader.

63. They were also entirely baseless, lacking any factual support whatsoever.

64. By publishing and republishing these false accusations, Defendants acted with reckless disregard for the truth or falsity of their statements.

65. Defendants' statements did not merely constitute criticism or opinion, but instead conveyed to third parties that Plaintiff engaged in concrete acts of racial bias in the presence of children and possessed an improper and unlawful interest in minors.

66. In modern American society, accusations of racism carry a uniquely stigmatizing and enduring effect. Such accusations function as a modern-day "scarlet letter," marking the accused as morally unfit and subjecting them to immediate condemnation, social ostracism, and reputational ruin, particularly in roles requiring fairness, neutrality, and public trust.

67. Such accusations strike at the core of Plaintiff's character, integrity, and fitness to serve in positions of trust, including his role as a referee in youth athletics, where impartiality and appropriate conduct around minors are paramount.

68. Defendants' escalation of these allegations magnified the harm to Plaintiff's reputation, exposing him to public contempt, ridicule, and suspicion of criminal and morally reprehensible conduct, and threatening his ability to continue participating in officiating and other community activities.

69. By falsely imputing to Plaintiff racist misconduct, moral turpitude, and sexual misconduct involving minors, Defendants' statements constitute defamation per se, as they are so inherently injurious that they necessarily damage Plaintiff's reputation and entitle him to recover damages without the need to plead or prove special damages.

### **The Escalating Smear Campaign**

70. Defendants' accusations did not occur in isolation, nor were they limited to a single statement or publication.

71. Rather, Defendants repeatedly echoed, reinforced, and amplified the same accusations across multiple public Facebook discussions, ensuring that the allegations were widely disseminated within the community.

72. Defendant Greenleaf asserted as a matter of fact that Plaintiff used racist language in front of children, thereby accusing Plaintiff of engaging in specific misconduct in the course of officiating a youth sporting event.

73. Defendant Witt repeated and amplified allegations that Plaintiff engaged in racist and sexist misconduct, presenting these accusations as factual assertions despite having no reliable basis to support them.

74. Defendant Walsh escalated these accusations further by asserting or implying that Plaintiff engaged in sexual misconduct involving minors, a claim of an extraordinarily serious and verifiable nature.

75. These statements were made and republished during Plaintiff's campaign for public office, at a time when Plaintiff's reputation and fitness for public trust were central to public consideration, and Defendants knew or recklessly disregarded that their statements would be understood as factual claims concerning Plaintiff's character and conduct.

76. Defendants did not engage in mere political commentary or opinion, but instead published and republished false statements of fact concerning Plaintiff without any reasonable basis for believing them to be true, and did so in a manner designed to, or with reckless disregard for the likelihood that it would, damage Plaintiff's reputation within the community and undermine his candidacy.

### Civil Conspiracy Allegations

77. Defendants' statements were not isolated or spontaneous remarks, but instead formed part of a broader pattern of repeated and reinforcing publications.

78. Rather than standing alone, Defendants' statements were echoed, reiterated, and reinforced within the same public discussions, creating a continuous and escalating stream of accusations directed at Plaintiff.

79. Each Defendant participated in this pattern by repeating, adopting, or amplifying accusations originally made by others, thereby giving renewed life and visibility to those statements.

80. Through this repetition, Defendants created the false and misleading impression that the accusations against Plaintiff were widely known, independently corroborated, and supported by multiple sources.

81. Defendants knew, or reasonably should have known, that the repeated assertion of the same accusations by multiple individuals would lend those accusations an unwarranted appearance of credibility and truth.

82. Defendants further knew, or reasonably should have known, that such repeated public accusations would encourage others to adopt and repeat the same narrative, even in the absence of personal knowledge or reliable evidence, thereby creating additional "echoes" of the same false claims.

83. In this way, Defendants' conduct fostered and amplified a self-reinforcing cycle in which repetition of the accusations, rather than verification of their truth, became the basis for their perceived credibility within the community.

84. Despite lacking any reliable or verifiable evidence to support the accusations, Defendants nevertheless continued to repeat and reinforce them in public forums.

85. By engaging in this pattern of repetition and reinforcement, Defendants acted in concert to promote and entrench a false narrative concerning Plaintiff's alleged conduct.

86. The coordinated nature of Defendants' conduct substantially magnified the harm to Plaintiff's reputation, as repeated accusations from multiple sources are more likely to be believed and accepted as true by members of the community.

87. Upon information and belief, this concerted conduct manifested in part through coordinated posting and amplification of accusations on the Grassroots Menomonee Falls Area Facebook page, where Defendants and others repeatedly echoed and reinforced the same allegations concerning Plaintiff.

88. Upon information and belief, Defendants used that Facebook forum as a vehicle to repeat, legitimize, and give apparent credibility to accusations of racist conduct and sexual misconduct involving minors, despite the absence of any factual basis for such claims.

89. The coordinated repetition and amplification of these accusations through the Grassroots Menomonee Falls Area Facebook page substantially expanded the reach and impact of the defamatory narrative, embedding it within the Menomonee Falls community and causing significant reputational harm to Plaintiff.

### **COUNT I – DEFAMATION**

90. Plaintiff repeats and realleges paragraphs 1 through 89 as though fully set forth herein.

91. Defendants published and republished statements concerning Plaintiff to third parties in public forums, including social media platforms, where such statements were accessible to members of the community.

92. These statements were false in all material respects.

93. Through these publications, Defendants accused Plaintiff of engaging in racist conduct toward children, sexual misconduct involving minors, and dishonest behavior, all of which are serious and verifiable allegations of misconduct.

94. Defendants knew these statements were false or, at a minimum, acted with reckless disregard for their truth or falsity by publishing and repeating them without any reliable factual basis.

95. As a direct and proximate result of Defendants' false and defamatory statements, Plaintiff has suffered significant harm, including damage to his reputation, standing in the community, and loss of professional and personal opportunities.

### **COUNT II – DEFAMATION PER SE**

96. Plaintiff repeats and realleges paragraphs 1 through 95 as though fully set forth herein.

97. Through their statements, Defendants accused Plaintiff of engaging in sexual misconduct involving minors and other conduct wholly incompatible with his profession, moral character, and fitness to be entrusted with positions of responsibility, particularly those involving children.

98. Accusations of this nature carry an immediate and devastating stigma, as they impute criminal conduct and moral depravity of the most serious kind, exposing Plaintiff to public outrage, condemnation, and social ostracism. Such statements are so inherently and obviously injurious that they constitute defamation per se, giving rise to a presumption of damages without the need for proof of special harm.

**COUNT III – TORTIOUS INTERFERENCE WITH PROSPECTIVE CONTRACTUAL  
AND ECONOMIC RELATIONSHIPS**

99. Plaintiff repeats and realleges paragraphs 1 through 98 as though fully set forth herein.

100. At all relevant times, Plaintiff maintained existing and prospective contractual and economic relationships within the Menomonee Falls community, including relationships with local businesses, campaign supporters, donors, and community organizations that depended upon Plaintiff's reputation, credibility, and standing.

- a. Relationships with local businesses that had agreed, or were reasonably likely to agree, to support Plaintiff's campaign through signage, promotion, or other material support;
- b. Relationships with individuals who had contributed or were reasonably likely to contribute financially to Plaintiff's campaign;
- c. Relationships with community members and organizations who had provided or were reasonably likely to provide endorsements, support, or assistance carrying both economic and reputational value; and
- d. Ongoing professional and business relationships within the Menomonee Falls community that were directly tied to Plaintiff's good name and standing.

101. These relationships and expectancies were concrete, ongoing, and reasonably certain to result in economic and reputational benefit to Plaintiff.

102. Defendants were aware of Plaintiff's candidacy and, upon information and belief, were aware of Plaintiff's relationships and expectancies within the community, including his efforts to secure financial support, endorsements, and business backing.

103. With that knowledge, Defendants engaged in a deliberate and coordinated course of conduct designed to interfere with, disrupt, and ultimately destroy Plaintiff's prospective contractual and economic relationships.

104. Defendants accomplished this by publishing and repeatedly amplifying false and defamatory statements concerning Plaintiff, including accusations of racist conduct toward children, sexual misconduct involving minors, and dishonesty toward local businesses—allegations that strike at the core of Plaintiff's character and would foreseeably deter any reasonable person or entity from associating with him.

105. Defendants' conduct was targeted at Plaintiff and was substantially certain to interfere with his relationships with community members, donors, and local businesses, particularly in the context of an ongoing public campaign where reputation is paramount.

106. In carrying out this conduct, Defendants employed independently wrongful means, including:

- a. Publishing and republishing false and defamatory statements concerning Plaintiff; and
- b. Knowingly making or publishing false representations pertaining to a candidate that were intended or tended to affect voting at an election, in violation of Wis. Stat. § 12.05.

107. Defendants' actions were intentional, malicious, and undertaken without justification or privilege, and were designed to cause reputational and economic harm to Plaintiff.

108. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff's prospective contractual and economic relationships were disrupted, diminished, and in many cases lost entirely.

109. Upon information and belief, such disruption included, but was not limited to:

- a. Businesses declining to support or display campaign signage;
- b. Individuals declining to contribute financially to Plaintiff's campaign;
- c. Community members withdrawing or withholding endorsements and support; and
- d. Damage to Plaintiff's ongoing business and professional relationships within the community.

110. Defendants' conduct not only interfered with existing and anticipated relationships, but also foreclosed future opportunities by tarnishing Plaintiff's reputation in a manner that would deter others from engaging with him.

111. As a direct and proximate result of Defendants' interference, Plaintiff has suffered substantial damages, including economic losses, lost business opportunities, diminished earning capacity, and reputational harm affecting his ability to participate in professional and community activities.

112. Defendants acted intentionally and with actual malice, in that they knew their statements were false or acted with reckless disregard for their truth or falsity, and nevertheless chose to publish and amplify them.

113. Defendants' conduct was a substantial factor in causing Plaintiff's damages and was so willful, wanton, and in reckless disregard of Plaintiff's rights as to

warrant the imposition of punitive damages, in addition to compensatory damages and all other relief permitted by law.

#### **COUNT IV – CIVIL CONSPIRACY**

114. Plaintiff repeats and realleges paragraphs 1 through 113 as though fully set forth herein.

115. Defendants did not act independently, but instead acted together and in concert to publish, republish, and amplify false accusations concerning Plaintiff.

116. Upon information and belief, Defendants reached a common understanding—whether express or tacit—to repeat, reinforce, and lend apparent credibility to allegations that Plaintiff engaged in racist conduct and sexual misconduct involving minors.

117. In furtherance of this agreement, each Defendant committed overt acts, including publishing, republishing, adopting, and amplifying the defamatory statements described above, thereby increasing their visibility and perceived reliability.

118. This concerted conduct included the coordinated use of social media platforms, including the Grassroots Menomonee Falls Area Facebook page, as a forum through which Defendants and others echoed and reinforced the same accusations, creating the false and misleading appearance that the allegations were widely corroborated and independently verified.

119. Defendants knew, or reasonably should have known, that this pattern of coordinated repetition would encourage others to adopt and repeat the same accusations, thereby multiplying their reach and entrenching a false narrative concerning Plaintiff within the community.

120. The object and foreseeable effect of Defendants' concerted conduct was to damage Plaintiff's reputation, undermine his standing in the community, and interfere with his relationships and candidacy for public office.

121. As a direct and proximate result of Defendants' coordinated and conspiratorial conduct, Plaintiff suffered substantial damages as described herein.

### **DAMAGES**

122. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered substantial damages, including but not limited to:

- a. Significant harm to his reputation within the community;
- b. Emotional distress, embarrassment, and mental anguish resulting from the public dissemination of false and highly damaging accusations;
- c. Damage to his professional standing and community reputation, including his ability to serve in positions of trust;
- d. Economic and relational harm, including the loss and disruption of business relationships, community support, and other opportunities as described above; and
- e. Other damages to be determined and proven at trial.

123. Defendants acted with malice or, at a minimum, with reckless disregard for the truth or falsity of their statements, in that they knew the accusations were false or published them without any reasonable basis for believing them to be true.

124. As a result of Defendants' willful, wanton, and malicious conduct, Plaintiff is entitled to an award of punitive damages in an amount sufficient to punish Defendants and deter similar conduct in the future, together with all other relief permitted by law.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff requests judgment against Defendants as follows:

- A. Compensatory damages in an amount to be determined at trial;
- B. Punitive damages;
- C. Costs and attorney fees as permitted by law;
- D. Such other and further relief as the Court deems just and proper.

Dated at New Berlin, Wisconsin, this 18th day of March, 2026.

*Electronically filed by Kevin M. Scott, Esq.*

Kevin M. Scott (SBN 1036825)

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