

Motion 1 – Allow any victims to testify via Zoom and in closed session if they choose.

Argument – As you know from my complaint, there are victims of sex crimes involved in this. If one or more should be called, they should not be forced to be in the same room as their offenders unless they so choose. The PFC, complainant, and respondent will all be able to receive testimony and make determinations without further humiliating them to the public. Testimony via Zoom has become commonplace. I, myself have testified many times for criminal matters as a Police Officer via Zoom. I am also aware Zoom testimony is still in place for criminal courts.

Motion 2 – Identify victims by their redacted identifiers as provided in the police investigative reports.

Argument – The PFC, complainant, and respondent will all know the identities of those testifying. For the purposes of the public hearing, I am asking that we prevent sex crime victims from being named and publicly humiliated, as that that would be the only real purpose of publicly naming them.

Motion 3 – Allow me to quote from fact checked, media outlets regarding this issue.

Argument - This goes along the lines of hearsay evidence. Established, well recognized media outlets have reported on this issue and obtained statements from subject matter experts including Attorneys and Police Union Leaders. I am asking to present/quote these statements as testimony. I will be adding some of their published statements in my arguments where they are not able to testify in person. For example, a representative of the WPPA is unable to testify in this matter, but his published statements to the media go towards the question of “best practice”. These public statements by content experts will be presented as a “totality of the circumstances” argument.

Motion 4 – Allow me to make a brief opening statement.

Argument – I would like a chance to make a brief opening statement to the PFC in order to introduce myself and outline my charges and witness testimony. This is reasonable, given the complexity and quantity of information I am asking the commissioners to consider. In addition, the commission has had ample opportunity to meet and learn about the qualifications of the members of the City government making their case, so it is only fair to allow the commissioners to learn something about me as well.

Motion 5 – Allow the commissioners to consider the totality of all documented policy violations and charges.

Argument – Likely, the City will attack each charge with arguments of “Chief’s Discretion.” To be clear at the outset, the criminal charge I am alleging goes directly to the Chief’s abuse of discretion. That is to say, I am not going to argue that the violation of the administrative leave policy justifies firing the Police Chief. What I will argue is that violating the administrative leave policy among others, coupled with the deliberate hiding of information and lying to the District Attorney will support the conclusion that the Chief engaged in a criminal coverup. To eliminate any charges without hearing the evidence would be a travesty.

Motion 6 – Allow Power Point Presentation

Argument – I ask the PFC to provide a device that will allow a PowerPoint presentation. The commissioners will be examining a lot of information, including written documentation. My PowerPoint slides will make it easier for you, the public, and the respondent to follow along.

Motion 7 – Motion 9 – Clearly define the “preponderance of evidence” rule for the hearing.

Argument – The preponderance of evidence is the burden of proof that I have in this hearing. The Preponderance of evidence is simply “more likely than not” or 51/49. Preponderance of evidence is far different from a criminal court of “beyond a reasonable doubt.” It’s crucial that this difference is explained to the PFC and the interested public to make sure everyone understands the appropriate standard for deciding this matter.

Motion 8 – Immediate removal of Chuck Adams as counsel for the PFC for the purposes of this hearing

Argument – I have several concerns regarding the ethics and conflicts of interest regarding Attorney Adams role in this hearing. I have brought a complaint against the Chief of Police for the City of Sheboygan. The City of Sheboygan has elected to utilize their own HR Director to deny my claims against the Chief. As a practical matter, this decision prejudices the commission by standing the City of Sheboygan behind the Chief’s actions. Chuck Adams and the HR Director work together in the same building and are representing different entities in this hearing. I will be presenting multiple witnesses that will be testifying to Attorney Adams’ knowledge of my complaint, and some will testify that Adams and the City were more interested in burying these violations and complaints than dealing with them appropriately. I will also provide testimony that Attorney Adams, possibly along with others, initially brought in an outside investigator to investigate the Chief’s handling of this matter, but then abruptly called off the investigation. To explore this decision, I will possibly be calling Attorney Adams as a

witness, and he has a vested interest in how this plays out. As one final example of how his conflict taints his credibility in this matter, Attorney Adams unilaterally decided to withhold this complaint from the PFC for almost 30 days. His stated intention was to prevent the PFC from reading the complaint and forming an opinion or bias. I filed this complaint in accordance with all the guidelines provided to me and it is completely unacceptable that he withheld it from the PFC. I asked Attorney Adams to cite any law or procedure that allows him to unilaterally withhold complaints from the PFC, and he has not done so. Simply put, he should not be providing legal counsel or advice to the PFC for this hearing, as he has demonstrated poor judgement multiple times related to this issue already.

Motion 9 – Allow me to submit evidence digitally.

Argument – Based on the reports that I have being hundreds of pages of evidence, along with many other paper copies, I am asking to submit evidence digitally.