FOR IMMEDIATE RELEASE

November 10, 2026

Mandela Barnes Files Defamation Lawsuit Against Journal Sentinel

Complaint challenges reporting about a purported party investigation and alleges the newspaper published materially false statements and implications despite contrary information and a disclosed reporting conflict

MILWAUKEE — Former Wisconsin Lieutenant Governor Mandela Barnes today filed a defamation lawsuit against Journal Sentinel, Inc. in Milwaukee County Circuit Court concerning two articles published on July 30, 2026, titled "Sources detail concerns about Mandela Barnes' behavior toward women" and "Mandela Barnes ends Democratic campaign for Wisconsin governor," and their associated online presentation.

The complaint challenges the newspaper's reporting about a purported Democratic Party of Wisconsin investigation, allegations that Barnes repeatedly used his political status to obtain sexual encounters, and the connection the articles allegedly conveyed between those matters and his withdrawal from the gubernatorial race.

"I understand that seeking public office brings scrutiny, and I respect the essential role of a free press," Barnes said. "Accuracy and fairness matter deeply when reporting affects a person's reputation, family, and future. I dispute the reporting identified in this complaint and believe it created a materially false picture of me and my conduct. I asked the Journal Sentinel to correct it, and the newspaper declined. I am bringing this case so the disputed facts can be examined through the legal process."

The complaint alleges that the articles materially mischaracterized the party's handling of an anonymous letter by describing an outside probe and institutional investigation that Barnes maintains did not occur. It distinguishes any review by the party's regularly retained lawyers from a factual investigation into his conduct.

The complaint also challenges the factual implications of statements that Barnes repeatedly took advantage of his political status to seek sexual encounters. Barnes alleges that the newspaper's presentation conveyed a pattern of misconduct unsupported by the facts and disregarded contrary information that was supplied.

The pleading further describes a reporting conflict involving a reporter who participated in developing the story and who had previously had an intimate

relationship with Barnes. According to the complaint, the campaign disclosed that relationship before publication, the newspaper acknowledged the conflict and removed the reporter, and other reporters were to re-report portions of her work. The challenged articles were published later that same day. The complaint identifies that sequence, together with prepublication communications and warnings, as part of the basis for its actual-malice allegations.

"The complaint identifies specific statements and implications that Mr. Barnes alleges are materially false, including the reporting about a supposed party investigation," said Michael J. Cerjak, counsel for Barnes. "It also details the information provided to the Journal Sentinel before publication and the newspaper's handling of a disclosed reporting conflict. Those allegations are central to the claims we are asking the court to resolve."

Barnes maintains that his withdrawal was based on independent political and financial considerations. The lawsuit does not seek damages on the theory that the articles caused him to withdraw. It seeks damages for alleged reputational and other injuries resulting from publication.

Before filing, Barnes requested correction and retraction. The Journal Sentinel declined, stating that it stands by its reporting and disputes Barnes' claims.

Journal Sentinel, Inc. is the sole defendant. The complaint seeks compensatory damages, punitive damages as permitted, and other relief. It requests a jury trial.

A copy of the complaint and Barnes's October 28, 2026, notice demanding correction and retraction are attached. The documents identify the specific statements and implications Barnes challenges, the facts he alleges contradict the reporting, and the corrections he requested before filing suit.

Barnes is represented by Barton Cerjak S.C.

Case Details: *Barnes v. Journal Sentinel, Inc.*, Milwaukee County Case No. 2006CV010118

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BARTON CERJAK s.c.
UNCOMPROMISING ADVOCATES

October 28, 2026

VIA CERTIFIED MAIL AND EMAIL

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RE: *Mandela Barnes* – Notice Under Wis. Stat. § 895.05(2) and Demand for Correction and Retraction

Dear Ms. Spicuzza, Ms. Beck, Mr. Borowski, and Representatives of the Milwaukee Journal Sentinel and Gannett:

Our firm represents Mandela Barnes concerning two related articles published by the Milwaukee Journal Sentinel on July 30, 2026.

The first article, by Mary Spicuzza and Molly Beck, is titled "Sources detail concerns about Mandela Barnes' behavior toward women." It was published July 30, 2026, updated August 3, 2026, at 6:24 p.m. CT, and is available at:

- https://www.jsonline.com/story/news/politics/elections/2026/07/30/concerns-about-mandela-barnes-behavior-with-women-prompted-democratic-party-review/91065405007/

The second article, also by Mary Spicuzza and Molly Beck, is titled "Mandela Barnes ends Democratic campaign for Wisconsin governor." It was updated July 30, 2026, at 9:32 p.m. CT and is available at:

- https://www.jsonline.com/story/news/politics/elections/2026/07/30/mandela-barnes-ends-campaign-for-governor/91101126007/

We refer to these publications collectively as the "Articles."

This letter constitutes Mr. Barnes's formal written notice under Wis. Stat. § 895.05(2). It identifies the Articles and the particular statements and implications Mr. Barnes contends are false and defamatory, states the corresponding true facts, and provides the Journal Sentinel and the other responsible parties with an opportunity to publish an appropriate correction and retraction.

The central problem is not that the Journal Sentinel reported that Mr. Barnes had dated women while he was single. The problem is that the Articles combined an anonymous and nonspecific letter, a purported party investigation, anonymous accusations of a supposed pattern of behavior, and a dated relationship between two adults in a manner that falsely conveyed that Mr. Barnes had repeatedly exploited his political office or status to engage in predatory, coercive, or otherwise inappropriate sexual conduct toward young women.

No such misconduct occurred. No person identified in the Articles accused Mr. Barnes of committing a crime, abusing anyone, engaging in workplace harassment, or using governmental, employment, or political authority to obtain a sexual relationship. Nevertheless, the headlines, leads, structure, terminology, placement, and timing of the Articles conveyed the opposite impression.

1. False reports of an outside-law-firm investigation

The article titled "Sources detail concerns about Mandela Barnes' behavior toward women" states:

> *"Democratic Party of Wisconsin officials in 2025 hired an outside law firm to review allegations of inappropriate behavior involving young adult women against one of the party's stars, Mandela Barnes, according to a person familiar with the matter."*

It further states:

> *"The party launched the probe after an anonymous person sent a letter first to then-party chairman Ben Wikler in 2024 accusing the party of turning a blind eye to 'the egregious*

> *way [Barnes has] used his office and power to gain access to women,' the source said."*

The article later states:

> *"Ultimately, the review did not turn up anything the party could take action on because of its lack of details, according to the person familiar."*

The related article titled "Mandela Barnes ends Democratic campaign for Wisconsin governor" similarly states:

> *"The state Democratic Party in 2025 hired a law firm to look into similar claims sent in a letter but the allegations they received were anonymous and unspecific."*

It further states:

> *"The party's internal review and outside probe found nothing actionable, according to a source familiar with the party's response."*

These statements are false and defamatory.

The Democratic Party did not specially retain an outside law firm to investigate Mr. Barnes. The party's regularly retained counsel may have reviewed the anonymous letter in its ordinary advisory capacity, but neither counsel nor the party conducted a factual investigation or "outside probe." No witnesses were interviewed, Mr. Barnes and his campaign were never contacted or interviewed, no specific incidents were investigated, and no investigative report, findings, or determination concerning Mr. Barnes were produced.

The anonymous letter referenced in the Articles contained no names, no specific incidents, and no concrete allegations capable of being investigated. Receipt or internal referral of such a letter is not equivalent to retaining an outside law firm to investigate Mr. Barnes, launching an outside probe, or conducting an investigation into his conduct.

The assertion that an outside law firm was retained and that an investigation occurred supplied the Articles with an appearance of institutional confirmation that did not exist. It suggested that the party considered allegations against Mr. Barnes sufficiently specific and credible to warrant a formal investigation and that the investigation ended without action only because the allegations were insufficiently detailed. That was false.

The Journal Sentinel should retract these statements and prominently correct the record to state that no outside law firm was retained to investigate Mr. Barnes and that no party investigation or outside probe into his conduct occurred.

The true facts can be confirmed through current and former leadership of the Democratic Party of Wisconsin and through the party's records.

2. False assertion that Mr. Barnes repeatedly exploited his political status to obtain sexual encounters

The article titled "Sources detail concerns about Mandela Barnes' behavior toward women" states:

> *"Additionally, three other sources, who in recent days agreed to speak to the Milwaukee Journal Sentinel on the condition of anonymity, said Barnes, 39, has repeatedly taken advantage of his status within the party to seek sexual encounters with young adult women. One of the sources had a sexual relationship with him, while the other two had firsthand knowledge of the behavior. No one has alleged they were abused by Barnes."*

The withdrawal article likewise states:

> *"The decision by Barnes came amid reporting by the Milwaukee Journal Sentinel into allegations that Barnes was taking advantage of his role in the party to have sexual encounters with young adult women."*

The assertion and implication that Mr. Barnes repeatedly used or abused political office, power, status, or authority to obtain sexual encounters is false and defamatory.

Mr. Barnes has never used public office, employment authority, governmental power, or party authority to pressure, coerce, threaten, reward, or induce anyone to enter a sexual or romantic relationship. He has never conditioned employment, advancement, access, political support, professional opportunity, or any other benefit on a personal or sexual relationship. No woman identified in the Articles worked for Mr. Barnes, reported to him, or was subject to his supervisory or employment authority in connection with the conduct described. Mr. Barnes did not use or exploit his party standing, political prominence, personal connections, access, or perceived influence to obtain any sexual or romantic relationship.

The Articles identify no instance in which Mr. Barnes offered or withheld an official, professional, political, or employment benefit to obtain a relationship. They identify no complaint made against him during his service in the Wisconsin State Assembly or as lieutenant governor. Indeed, the principal article acknowledges that no one accused him of a crime, that no official complaint was filed, and that no one alleged that he abused them.

The only source whose own relationship with Mr. Barnes is described in the Articles discusses a relationship between two adults that began in 2018 and continued for months. Mr. Barnes did not employ or supervise that person. The relationship was

consensual. The Journal Sentinel was provided with contemporaneous communications bearing directly on the nature and continuation of the relationship, but the article did not fairly present that context.

The remaining anonymous sources are not identified as persons with whom Mr. Barnes had a sexual or romantic relationship. The article provides no specific facts supporting their broad assertion that he repeatedly "took advantage" of anyone. It nevertheless presents that accusation as evidence of an established pattern.

The Journal Sentinel should retract the assertion that Mr. Barnes repeatedly took advantage of his political status to obtain sexual encounters and should correct the false implication that he engaged in a pattern of predatory, coercive, or otherwise inappropriate conduct.

3. The headline, AI-generated summaries, and overall defamatory implication

The principal article's headline states:

> *"Sources detail concerns about Mandela Barnes' behavior toward women."*

The headline does not describe ordinary, consensual relationships between adults. It invites readers to believe that multiple women described troubling or improper treatment by Mr. Barnes.

That implication is reinforced by the article's opening claim that the Democratic Party retained an outside law firm, its repeated use of the terms "probe," "review," "inappropriate behavior," and "took advantage," and its placement of the article in the immediate context of Mr. Barnes's withdrawal from the gubernatorial race.

The current online version also displays an "AI Overview" stating:

> *"Democratic Party officials in Wisconsin hired an outside firm to investigate anonymous allegations that former lieutenant governor Mandela Barnes used his position to pursue sexual encounters with young adult women; the review found no actionable evidence, and Barnes ended his 2026 gubernatorial campaign, acknowledging past relationships but denying misconduct."*

The current online version of the withdrawal article displays an "AI Overview" stating:

> *"Former Lt. Gov. Mandela Barnes ended his campaign for Wisconsin governor on July 30, 2026, citing the clear emergence of state Rep. Francesca Hong as the Democratic nominee, while the decision came amid allegations of*

> *inappropriate sexual conduct that have not led to any criminal charges."*

The phrase "allegations of inappropriate sexual conduct" is particularly false and damaging. The Articles do not identify anyone who accused Mr. Barnes of sexual assault, sexual harassment, coercion, abuse, or other sexual misconduct. Saying merely that such allegations "have not led to any criminal charges" compounds the false implication by suggesting the existence of potentially criminal sexual conduct for which charges were considered but not brought.

Read as a whole, the Articles and accompanying summaries convey that:

- multiple women accused Mr. Barnes of mistreating them;
- Mr. Barnes repeatedly exploited his office, authority, or political power to obtain sexual encounters;
- he was the subject of allegations of "inappropriate sexual conduct";
- his behavior was predatory, coercive, or otherwise improper;
- the allegations were sufficiently credible to prompt the Democratic Party to retain outside counsel and conduct a formal investigation; and
- the investigation and the Journal Sentinel's reporting were connected to his decision to withdraw from the race.

Those implications are false.

No woman quoted in the Articles accused Mr. Barnes of using force, threats, employment authority, official authority, or a quid pro quo. No one accused him of workplace sexual harassment. No one accused him of offering or withholding a political or professional benefit. No formal complaint was made against him. No outside law firm investigated him, and no party investigation or outside probe into his conduct occurred.

The Articles' limited underlying facts did not support the grave implications created by their headlines, leads, structure, terminology, and summaries. Correct the characterization that Mr. Barnes was the subject of "allegations of inappropriate sexual conduct" and clarify that no source identified in the Articles accused him of nonconsensual sexual activity, assault, workplace harassment, coercion, abuse, or a sexual quid pro quo.

4. False and misleading connection between the reporting and Mr. Barnes's withdrawal

The principal article states:

> *"Barnes announced he was ending his campaign for governor on July 30, days after the news organization asked questions related to the newspaper's investigation."*

The withdrawal article states:

> *"The decision by Barnes came amid reporting by the Milwaukee Journal Sentinel into allegations that Barnes was taking advantage of his role in the party to have sexual encounters with young adult women. The Journal Sentinel is continuing to report the story."*

The withdrawal article then immediately states:

> *"The state Democratic Party in 2025 hired a law firm to look into similar claims sent in a letter but the allegations they received were anonymous and unspecific."*

It further states:

> *"The party's internal review and outside probe found nothing actionable, according to a source familiar with the party's response. Barnes has not been accused of any crimes."*

These statements, their placement at the beginning of the withdrawal article, and their juxtaposition falsely imply that Mr. Barnes withdrew because of the Journal Sentinel's questions, because of allegations of sexual misconduct, or because a party investigation had uncovered or substantiated wrongdoing.

The true chronology is materially different.

Mr. Barnes's campaign had decided that he would withdraw for independent political and financial reasons. The campaign informed the Journal Sentinel of that decision and offered the newspaper the opportunity to report the withdrawal. Only afterward did the Journal Sentinel inform the campaign that it had decided to publish the allegations article.

Mr. Barnes did not withdraw because a party investigation had uncovered misconduct. No such investigation or finding existed. He did not withdraw because he had committed or been credibly accused of wrongdoing. The Journal Sentinel knew before publication that the withdrawal decision had been made and communicated independently of its subsequent decision to publish the allegations article. The decision was based on internal polling, the absence of a viable political path, and financial considerations following developments in the race. The campaign can substantiate those reasons through contemporaneous polling and internal records.

The juxtaposition of the purported investigation, the Journal Sentinel's inquiries, and Mr. Barnes's withdrawal created a false causal implication that was

then repeated by other news organizations. The Journal Sentinel should correct the chronology and state clearly that the decision to withdraw had been made and communicated to the newspaper before the Journal Sentinel informed the campaign that it would publish the allegations article.

5. Required correction and retraction

On behalf of Mr. Barnes, we request that the Milwaukee Journal Sentinel and the other responsible parties:

1. Retract the report that the Democratic Party of Wisconsin retained an outside law firm to investigate Mr. Barnes or allegations concerning his conduct.

2. Retract the report that the party launched an outside probe or conducted an investigation into allegations of inappropriate behavior by Mr. Barnes.

3. Retract the assertion that Mr. Barnes repeatedly took advantage of his political status, office, role, power, or authority to obtain sexual encounters.

4. Correct and retract the characterization of the accusations described in the Articles as "allegations of inappropriate sexual conduct," and clarify that no source identified in the Articles accused Mr. Barnes of nonconsensual sexual activity, assault, workplace harassment, coercion, abuse, or a sexual quid pro quo.

5. Correct the false implication that multiple women accused Mr. Barnes of predatory, coercive, abusive, or otherwise inappropriate conduct.

6. Correct the false implication that Mr. Barnes's withdrawal from the gubernatorial race resulted from the Journal Sentinel's inquiries, allegations of misconduct, or a party investigation.

7. Publish corrected headlines and summaries that do not continue to imply that multiple women described misconduct by Mr. Barnes or that he was the subject of an investigation into sexual misconduct.

8. Remove or correct the inaccurate AI Overviews and any other automated summaries appearing with the Articles.

9. Place the correction and retraction prominently at the top of each affected online article and publish it in a position and manner at least as prominent as the original reporting.

10. Correct any materially identical social-media posts, alerts, summaries, or other publications controlled by the Journal Sentinel or Gannett.

11. Take reasonable steps to notify syndication and republication partners that the challenged reporting has been corrected and retracted.

A correction limited to an inconspicuous editor's note, or one that repeats the challenged accusations while merely adding that Mr. Barnes disagrees, would not address the false statements and implications identified above. If the recipients contend that any relevant true facts cannot be ascertained with definiteness and certainty, Mr. Barnes requests publication, without comment and with the prominence required by § 895.05(2), of his complete statement of the true facts—not merely a generalized statement that he disputes the reporting.

An appropriate correction would state substantially as follows:

> **Correction and Retraction:** The Milwaukee Journal Sentinel previously reported that the Democratic Party of Wisconsin hired an outside law firm and conducted an outside probe or investigation into allegations of inappropriate behavior by Mandela Barnes. The party did not retain an outside law firm to investigate Barnes, and no investigation or outside probe into his conduct occurred. Barnes was not accused of a crime, workplace sexual harassment, abuse of official authority, coercion, or any quid pro quo involving employment or political opportunity. Barnes did not exploit political status or prominence. The Journal Sentinel also previously created the impression that Barnes withdrew from the gubernatorial race because of a party investigation, allegations of misconduct, or the Journal Sentinel's reporting. His campaign had decided upon and informed the Journal Sentinel of his withdrawal before the newspaper informed the campaign that it would publish its allegations article. The Journal Sentinel retracts any contrary statement or implication.

Please confirm in writing within seven days after receipt of this notice whether the Journal Sentinel will publish the requested correction and retraction. Wisconsin Stat. § 895.05(2) contemplates a timely correction published without comment and with prominence comparable to the original publication. This request for written confirmation does not purport to shorten the reasonable opportunity for correction provided by § 895.05(2).

Please direct all communications regarding this matter to our office. Mr. Barnes should not be contacted directly.

PRESERVATION OF RELEVANT MATERIALS

Please preserve all documents and electronically stored information relating to the Articles, the associated AI Overviews, and their publication, including reporting notes, recordings, drafts, revision histories, source communications, text messages, emails, internal messaging, editorial communications, fact-checking materials, communications with the Democratic Party of Wisconsin, communications with Mr.

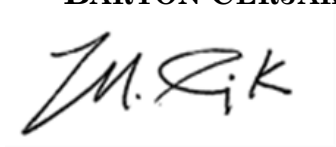
Barnes's campaign or its representatives, instructions or data used to generate the AI Overviews, syndication records, social-media materials, publication analytics, and records concerning subsequent edits, updates, corrections, or republications.

Nothing in this letter waives any claim, remedy, or right belonging to Mr. Barnes. All are expressly reserved.

We hope the Journal Sentinel will use this opportunity to correct the record promptly and prominently.

Very truly yours,

BARTON CERJAK S.C.



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Direct: 414-488-1985
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bcc: Mandela Barnes (by e-mail)

FILED
11-10-2026
Anna Maria Hodges
Clerk of Circuit Court
2026CV010118
Honorable Reyna Morales-42
Branch 42

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

MANDELA BARNES,
1220 East Locust Street, Unit 103
Milwaukee, Wisconsin 53212

Plaintiff,

v.

JOURNAL SENTINEL INC.,
c/o Corporation Service Company, *Its Registered Agent*
33 East Main Street, Suite 610
Madison, Wisconsin 53703

Defendant.

Case No.: _____

Case Code: 30106

SUMMONS

THE STATE OF WISCONSIN, to each person or entity named above as a Defendant:

You are hereby notified that the Plaintiff in the above–captioned action 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 ***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.

Your answer must be sent or delivered to the Court and Plaintiff's counsel, whose respective addresses are set forth below:

MILWAUKEE COUNTY CIRCUIT COURT
901 North 9th Street
Milwaukee, Wisconsin 53233

BARTON CERJAK S.C.
Michael J. Cerjak, Esq.
313 North Plankinton Avenue, Suite 207
Milwaukee, Wisconsin 53203

You may have an attorney help you or represent you. If you do not provide a proper answer within ***45 days***, the Court may grant a 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.

Dated this 10th day of November, 2026.

BARTON CERJAK S.C.

/s/ Electronically signed by Michael J. Cerjak
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FILED
11-10-2026
Anna Maria Hodges
Clerk of Circuit Court
2026CV010118
Honorable Reyna Morales-42
Branch 42

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

MANDELA BARNES,
1220 East Locust Street, Unit 103
Milwaukee, Wisconsin 53212

Plaintiff,

v.

JOURNAL SENTINEL INC.,
c/o Corporation Service Company, *Its Registered Agent*
33 East Main Street, Suite 610
Madison, Wisconsin 53703

Defendant.

Case No.: _____

Case Code: 30106

COMPLAINT

NOW COMES Plaintiff, Mandela Barnes ("Barnes") by and through his attorneys, Barton Cerjak S.C., and for his Complaint against Defendant, Journal Sentinel, Inc. (the "Journal Sentinel" or "Defendant"), alleges and states as follows:

INTRODUCTION

1. This case concerns a trusted newspaper's decision to manufacture the appearance of sexual misconduct from facts that established no sexual misconduct at all. It involves two articles published by the Journal Sentinel on July 30, 2026: "Sources detail concerns about Mandela Barnes' behavior toward women" (the "Allegations Article") and "Mandela Barnes ends Democratic campaign for Wisconsin governor" (the "Withdrawal Article"); they are collectively referred to as the "Articles."

2. No woman identified in the Journal Sentinel's reporting accused Barnes of sexual assault, nonconsensual conduct, workplace harassment, coercion, abuse of governmental authority,

or any sexual quid pro quo involving employment or political opportunity. No formal complaint had ever been filed against him. No factual investigation or outside probe into his conduct occurred.

3. The Journal Sentinel nevertheless combined an anonymous political letter, a consensual relationship between two adults, generalized accusations from unnamed sources, and a supposed institutional investigation to convey that Barnes had repeatedly exploited his political status to obtain sexual encounters with young women.

4. Barnes has spent much of his adult life in public service. He has served in the Wisconsin State Assembly, served as Wisconsin's lieutenant governor, and sought election to the United States Senate and the governorship of Wisconsin. He understands that public service brings intense scrutiny, difficult questions, political criticism, and truthful reporting that may sometimes be personally uncomfortable.

5. But entering public life does not require a person to surrender his humanity, dignity, private life, or right to truthful reporting. Public figures are not public property. They remain entitled to protection against knowing and reckless falsehoods that destroy reputations, careers, and personal lives.

6. A free press plays an indispensable role in American democracy. That freedom protects vigorous investigation, criticism, and honest error. It does not grant a newspaper license to convert anonymous rumor into established fact, consensual adult relationships into implied sexual misconduct, or an ordinary legal review of an anonymous letter into a formal institutional investigation that never occurred.

7. The Articles reported that officials of the Democratic Party of Wisconsin had hired an outside law firm, launched a "probe," conducted an internal review and outside investigation, and found nothing actionable only because the allegations lacked detail.

8. Those reports were false or materially false. The party did not specially retain a law firm to investigate Barnes. At most, its regularly retained counsel reviewed the anonymous letter in the ordinary course of advising the party. No factual investigation or outside probe occurred. No investigator contacted Barnes. No one interviewed him or his campaign. No identified witness was questioned about a specific incident. No investigative report, findings, or determination concerning Barnes was ever issued.

9. The distinction was critical. By reporting an internal investigation and outside probe, the Journal Sentinel supplied an anonymous and nonspecific political attack with the appearance of official corroboration, institutional concern, and investigative legitimacy that did not exist.

10. Without the supposed investigation, the Journal Sentinel had no story of discovered public misconduct. It had an anonymous letter containing no names, dates, specific incidents, or concrete allegations capable of investigation; generalized assertions from unnamed sources; and one dated, consensual relationship between two unmarried adults.

11. The only source whose own relationship with Barnes was described did not work for him, did not report to him, and was not subject to his governmental, political, or employment authority. Their relationship was consensual and continued for months. Before publication, the Journal Sentinel received contemporaneous communications bearing directly on the consensual and continuing nature of that relationship.

12. The Articles identified no occasion on which Barnes threatened anyone, promised or withheld employment or political opportunity, conditioned access or professional advancement on a relationship, performed or withheld an official act, or otherwise used governmental, employment, or party authority to obtain sex.

13. The Journal Sentinel nevertheless published that Barnes had "repeatedly taken advantage of his status within the party to seek sexual encounters with young adult women." Presented as the account of sources possessing supposed firsthand knowledge, that statement conveyed that undisclosed facts established a repeated pattern of Barnes exploiting political influence, access, or authority to obtain sexual relationships.

14. No such repeated pattern existed. Barnes has never used public office, employment authority, party authority, political influence, promised access, or threatened consequences to pressure or induce anyone into a sexual or romantic relationship.

15. The Journal Sentinel's reporting process was also compromised by a profound and undisclosed conflict of interest.

16. A Journal Sentinel political reporter who participated in developing or reporting the story had previously maintained a sexual relationship with Barnes. She nevertheless participated in reporting a story concerning Barnes's sexual and romantic relationships with other women.

17. Barnes's campaign discovered her involvement shortly before publication, disclosed the relationship to the Journal Sentinel, and objected to the obvious conflict. The Journal Sentinel acknowledged the conflict, removed the reporter from the matter, and represented that other reporters would "re–report" portions of the story.

18. The Journal Sentinel then published the challenged allegations later that same day.

19. Removing the reporter from the assignment did not resolve the questions created by her participation. The Journal Sentinel still needed to determine how the story had originated and developed, what information the reporter had gathered, which sources and leads she had pursued, what assumptions had influenced the reporting, and whether the acknowledged conflict had affected the story's premise, sourcing, or framing.

20. The Journal Sentinel did not postpone publication to resolve those questions. It proceeded within hours, despite its own acknowledgment of the conflict, the contrary information supplied by Barnes's campaign, the absence of a specific allegation of sexual misconduct, and a written prepublication warning that the accusations were false and the reporting process was tainted.

21. The Journal Sentinel did not disclose the conflict to its readers. The public was not told that a reporter who participated in reporting on Barnes's sexual relationships had herself maintained a sexual relationship with him. Readers were not told that the Journal Sentinel had removed her shortly before publication or that it purported to reconstruct portions of the reporting within hours.

22. The Journal Sentinel also used Barnes's withdrawal from the gubernatorial race to magnify the defamatory narrative. Its initial inquiries may have preceded the final withdrawal decision, but those inquiries did not cause Barnes to withdraw. The decision was based on internal polling, financial considerations, the emergence and support of another candidate, and the absence of a viable political path.

23. Before the Journal Sentinel informed Barnes's campaign that it had decided to publish the allegations story, the campaign had already decided that Barnes would withdraw,

informed the newspaper of that decision, explained the independent political reasons for it, and offered the Journal Sentinel an opportunity to report the withdrawal.

24. The Journal Sentinel nevertheless placed the anonymous accusations and supposed party investigation at the beginning of the withdrawal article and reported that Barnes's decision "came amid" its investigation into allegations that he was using his party role to obtain sexual encounters. The placement and juxtaposition invited readers to conclude that Barnes was leaving the race because allegations of sexual misconduct had been discovered or because the party had undertaken a factual investigation into credible allegations of misconduct.

25. The Journal Sentinel's online summaries sharpened the insinuation further by characterizing Barnes as having faced "allegations of inappropriate sexual conduct that have not led to any criminal charges." No source identified in the Articles accused Barnes of criminal, nonconsensual, coercive, or otherwise unlawful sexual conduct. The reference to the absence of criminal charges suggested the existence of potentially criminal accusations for which charges had merely not been brought.

26. Read as a whole, the Journal Sentinel's headlines, leads, anonymous pattern accusations, repeated references to an investigation and outside probe, treatment of a consensual relationship, juxtaposition with Barnes's withdrawal, and automated summaries conveyed a materially false narrative: that multiple women had described a repeated pattern of Barnes using political power to obtain sexual encounters; that those accusations were sufficiently concrete and credible to prompt a formal party investigation by outside counsel; and that the resulting scandal was connected to his withdrawal.

27. The Journal Sentinel published that narrative despite prepublication warnings, contrary evidence in its possession, obvious deficiencies in its anonymous sourcing, an acknowledged conflict compromising the reporting process, and serious reasons to doubt the accuracy and defamatory meaning of what it was preparing to publish.

28. This case is not about shielding a politician from scrutiny. It is not about preventing journalists from asking difficult questions or reporting uncomfortable truths. And it is not about imposing liability for an honest mistake.

29. It is about the Journal Sentinel transforming anonymous rumor into supposed institutional fact, portraying consensual adult conduct as evidence of a predatory pattern, and publishing grave implications of sexual and political misconduct despite information that contradicted its chosen narrative.

30. Freedom of the press protects robust journalism, criticism, and honest error. It does not immunize knowing falsehood, reckless disregard for truth, or the deliberate manufacture of defamatory meaning through implication, omission, and juxtaposition.

31. Barnes brings this action to restore the truth and repair the profound injury to his reputation, personal life, professional future, and ability to participate in public life.

32. Journalists may investigate misconduct. They may report misconduct when they find it.

33. They may not manufacture the appearance of misconduct when none occurred.

PARTY BACKGROUND

34. Plaintiff Mandela Barnes is an adult resident of Milwaukee, Wisconsin. He formerly served in the Wisconsin State Assembly and as Lieutenant Governor of Wisconsin and has been a candidate for statewide and federal office.

35. Defendant Journal Sentinel, Inc. is a Wisconsin corporation and the publisher of the Milwaukee Journal Sentinel and jsonline.com. It published, distributed, controlled, and continues to host the Articles at issue.

36. Mary Spicuzza was, at all relevant times, a Journal Sentinel reporter and is identified as a co–author of both Articles. She communicated directly with Barnes's campaign, received information and objections from the campaign, and participated in reporting and publishing the challenged statements.

37. Molly Beck was, at all relevant times, a Journal Sentinel reporter and is identified as a co–author of both Articles. On information and belief, she reported the party–investigation component and participated in drafting, verification, and publication of the challenged statements concerning a party review and outside probe.

38. Greg Borowski was, at all relevant times, the Journal Sentinel's editor. On information and belief, he exercised editorial authority over the Articles, received or was informed of the campaign's objections and the acknowledged reporter conflict, and approved the decision to publish after the conflict was disclosed.

39. At all relevant times, Spicuzza, Beck, Borowski, the Conflicted Reporter identified below, and the other reporters and editors involved in the Articles acted as employees or agents of the Journal Sentinel within the course and scope of their employment or agency. Their knowledge,

communications, reporting, editorial decisions, and publication conduct are attributable to the Journal Sentinel, which is liable for their conduct under applicable agency and respondeat–superior principles.

JURISDICTION AND VENUE

40. This Court has subject–matter jurisdiction under the Wisconsin Constitution and Wisconsin statutes.

41. The Court has personal jurisdiction over the Journal Sentinel because it is organized in Wisconsin and published the Articles in Wisconsin.

42. Venue is proper in Milwaukee County because the Milwaukee Journal Sentinel is published from Milwaukee County, substantial events giving rise to the claims occurred here, and the defamatory publications were directed to and received by readers here.

43. Barnes acknowledges that he is a public figure for purposes of these publications and therefore pleads actual malice as to each challenged defamatory statement and implication.

FACTUAL ALLEGATIONS

The Anonymous Letter and the Absence of a Party Investigation

44. Before publication of the Articles, an anonymous person circulated a letter accusing Barnes in generalized terms of using office and power to gain access to women.

45. The letter identified no complainant, no specific incident, no date, no witness, and no concrete act by Barnes capable of factual investigation.

46. The Democratic Party of Wisconsin did not specially retain an outside law firm to investigate Barnes or the anonymous letter.

47. The party's regularly retained lawyers may have reviewed the letter as part of their ordinary legal–advisory role. That review did not include a factual investigation or outside probe of Barnes.

48. No investigator contacted or interviewed Barnes. No investigator contacted or interviewed Barnes's campaign. No identified witness was interviewed concerning a specific incident. No investigative report or findings concerning Barnes were issued.

49. The distinction between an ordinary legal review of an anonymous letter and a specially commissioned factual investigation or "outside probe" is material. A reported outside probe communicates that an institution considered allegations sufficiently concrete and credible to warrant formal investigation and that an investigative process assessed the accused person's conduct.

50. Before publication, Barnes's representatives disputed the existence and characterization of any investigation and identified current or former party leadership as persons capable of confirming the actual facts.

The Relationship and the Information Given to the Journal Sentinel

51. The Articles described one source's relationship with Barnes beginning during a 2018 Democratic Party convention.

52. The source and Barnes were adults. The source did not work for Barnes, did not report to him, was not subject to his governmental or employment authority, and did not receive or lose an official, professional, employment, or political benefit because of the relationship.

53. The relationship was consensual and continued for months after the first encounter.

54. Before publication, Barnes's campaign provided Spicuzza with contemporaneous text–message history bearing on the consensual and continuing nature of the relationship. The

communications included post–encounter contact and interactions inconsistent with coercion or exploitation.

55. The campaign also explained that the source had not been Barnes's employee or subordinate and that Barnes held no office at the time of the first encounter described.

56. No source identified in the Articles accused Barnes of sexual assault, nonconsensual sexual activity, workplace harassment, a threat, a quid pro quo, or using an official act or employment authority to obtain sex.

57. Barnes has never used public office, party authority, employment authority, political influence, promised access, or threatened adverse consequences to pressure or induce a person into a sexual or romantic relationship.

58. The Articles nevertheless elevated a source's retrospective discomfort and generalized anonymous rumor into an asserted repeated pattern of taking advantage of political status, while omitting material context supplied by the campaign.

The Conflicted Reporter and the Same–Day Publication Decision

59. Before July 30, a Journal Sentinel political reporter other than Spicuzza and Beck (the "Conflicted Reporter") participated in developing or reporting the story and communicated with Barnes's campaign about it.

60. The Conflicted Reporter had previously maintained an intermittent sexual relationship with Barnes beginning in approximately 2018 and lasting several years.

61. On July 30, the campaign promptly disclosed the Conflicted Reporter's prior intimate relationship with Barnes to the Journal Sentinel and objected to the reporter's participation.

62. The Journal Sentinel acknowledged that the relationship presented a conflict, removed the Conflicted Reporter from the matter, and represented that other reporters would re-report portions of the story.

63. The Journal Sentinel published the challenged allegations later that same day.

64. The compressed interval between acknowledgment of the conflict and publication left little to no realistic time to conduct a genuinely independent reconstruction of the Conflicted Reporter's work, including the origin and development of leads, source selection, interview history, framing, and omitted contrary information.

65. The final Articles did not disclose the conflict, the Conflicted Reporter's participation, her removal, or the last-minute re-reporting process.

66. On the morning of publication, Attorney Brent Nistler sent Journal Sentinel counsel a written cease-and-desist and preservation letter on behalf of Barnes. The letter stated that the publication was circulating baseless allegations of sexual misconduct, relied on vague anonymous sources, and was tainted by an admitted conflict of interest.

The Allegations Article

67. On July 30, 2026, Journal Sentinel, Inc. published an article by Spicuzza and Beck titled "Sources detail concerns about Mandela Barnes' behavior toward women" at https://www.jsonline.com/story/news/politics/elections/2026/07/30/concerns-about-mandela-barnes-behavior-with-women-prompted-democratic-party-review/91065405007/.

68. The Allegations Article's lead stated:

> *"Democratic Party of Wisconsin officials in 2025 hired an outside law firm to review allegations of inappropriate behavior involving young adult women against one of the party's stars, Mandela Barnes, according to a person familiar with the matter."*

69. The Allegations Article further stated:

> *"The party launched the probe after an anonymous person sent a letter first to then–party chairman Ben Wikler in 2024 accusing the party of turning a blind eye to 'the egregious way [Barnes has] used his office and power to gain access to women,' the source said."*

70. It further stated:

> "*Ultimately, the review did not turn up anything the party could take action on because of its lack of details, according to the person familiar.*"

71. The Allegations Article then stated:

> "*Additionally, three other sources, who in recent days agreed to speak to the Milwaukee Journal Sentinel on the condition of anonymity, said Barnes, 39, has repeatedly taken advantage of his status within the party to seek sexual encounters with young adult women. One of the sources had a sexual relationship with him, while the other two had firsthand knowledge of the behavior. No one has alleged they were abused by Barnes.*"

72. The accusation that Barnes had repeatedly "taken advantage of his status" was reasonably understood as a factual assertion based on undisclosed conduct known to the three sources, not merely as loose rhetoric or an opinion based exclusively on the facts disclosed in the Allegations Article.

73. The statements concerning an outside–law–firm review, a party "probe," and a review that found nothing actionable were false or materially false because they described a formal investigative process that did not occur.

74. The accusation of repeated exploitation was false because Barnes did not use or exploit political status to procure sexual encounters, and the Allegations Article disclosed no specific facts establishing any repeated act of exploitation.

75. The headline and arrangement reinforced the implication that multiple women had reported concerning conduct toward them, although only one source described her own relationship and the other two sources' supposed firsthand knowledge was not explained.

76. The Allegations Article's acknowledgments that no one alleged abuse, Barnes was not accused of a crime, and no official complaint had been filed did not cure the different and still defamatory factual charge that he repeatedly exploited political status to obtain sex and had been subjected to a party probe because of that conduct.

The Withdrawal Article

77. On July 30, 2026, the Journal Sentinel published a second article by Spicuzza and Beck titled "Mandela Barnes ends Democratic campaign for Wisconsin governor" at https://www.jsonline.com/story/news/politics/elections/2026/07/30/mandela-barnes-ends-campaign-for-governor/91101126007/.

78. Near the beginning, the Withdrawal Article stated:

> "*The decision by Barnes came amid reporting by the Milwaukee Journal Sentinel into allegations that Barnes was taking advantage of his role in the party to have sexual encounters with young adult women.*"

79. It next stated:

> "*The state Democratic Party in 2025 hired a law firm to look into similar claims sent in a letter but the allegations they received were anonymous and unspecific.*"

80. It further stated:

> "*The party's internal review and outside probe found nothing actionable, according to a source familiar with the party's response.*"

81. The campaign's withdrawal decision was based on internal polling, the entry and support of another candidate, the absence of a viable political path, and financial considerations.

82. The Journal Sentinel's initial inquiries may have preceded a final withdrawal decision. Barnes therefore does not allege that the mere chronology reported in isolation was false. He alleges that the Withdrawal Article's placement and juxtaposition of the accusations, supposed party investigation, and withdrawal conveyed the additional factual implication that the purported misconduct or investigation caused or materially contributed to the withdrawal.

83. Before the Journal Sentinel told the campaign that it had decided to publish the Allegations Article, the campaign had decided to withdraw and had informed the newspaper of the decision and the independent political reasons for it.

84. The campaign expressly disputed that the Journal Sentinel's reporting or any misconduct had caused the withdrawal and offered contemporaneous polling and other objective support for the actual reasons.

85. The supposed internal review and outside probe did not exist, and neither misconduct nor an investigation caused Barnes to withdraw.

Automated Summaries and Continuing Publication

86. At the time of Barnes's October 28, 2026 notice to the Journal Sentinel, the online Allegations Article displayed an "AI Overview" stating:

> "*Democratic Party officials in Wisconsin hired an outside firm to investigate anonymous allegations that former lieutenant governor Mandela Barnes used his position to pursue sexual encounters with young adult women; the review found no actionable evidence, and Barnes ended his 2026 gubernatorial campaign, acknowledging past relationships but denying misconduct.*"

87. At that time, the online Withdrawal Article displayed an "AI Overview" stating:

> "*Former Lt. Gov. Mandela Barnes ended his campaign for Wisconsin governor on July 30, 2026, citing the clear emergence of state Rep. Francesca Hong as the Democratic nominee, while the decision came amid allegations of inappropriate sexual conduct that have not led to any criminal charges.*"

88. The phrase "allegations of inappropriate sexual conduct that have not led to any criminal charges" intensified the false implication by communicating that Barnes faced accusations of potentially criminal or nonconsensual sexual conduct, when the Articles identified no such accusation.

89. On information and belief, the Journal Sentinel selected, implemented, approved, controlled, or continued to publish the summaries as part of its presentation of the Articles.

90. The summaries were included in the October 28 notice and thus provided the Journal Sentinel with actual post–publication knowledge of the precise claimed falsities and implications.

Actual Malice

91. Spicuzza personally received extensive prepublication information from Barnes's campaign manager and other campaign representatives, including denials, contrary context, and materials bearing on the source relationship.

92. Spicuzza and the Journal Sentinel knew that the anonymous letter lacked names, incidents, dates, and concrete allegations. The Allegations Article itself admitted that lack of detail while nevertheless representing that a party probe and outside review had occurred.

93. Beck was responsible, in whole or material part, for reporting the party component. On information and belief, she knew the supposed probe rested on a single anonymous account, the party had not confirmed a specially retained investigation, the law firm was not identified, and no investigative act, witness interview, report, or finding had been identified.

94. Borowski and the Journal Sentinel's responsible editors received or were informed of the campaign's objections, the Conflicted Reporter's prior sexual relationship with Barnes, and

the demand that publication stop. The Journal Sentinel's acknowledgement of the conflict and removal of the reporter establish that it was aware of the conflict before publishing the challenged allegations.

95. The Journal Sentinel nevertheless retained the core premise and framing and published later the same day, despite representing that others would re–report the conflicted work.

96. The same–day schedule was not simply a failure to investigate. The publication decision must be considered together with the specific contrary information and prepublication communications described. The acknowledged conflict and compressed publication schedule are circumstances supporting the allegation of actual malice when considered with the information received by the responsible reporters and editors concerning the source relationship, the disputed party investigation, and the independent reasons for withdrawal.

97. The campaign provided contemporaneous evidence inconsistent with the defamatory exploitation narrative, but the Journal Sentinel omitted that context while publishing the generalized accusation from anonymous sources as a repeated pattern.

98. The July 30 attorney letter expressly warned the Journal Sentinel that the sexual–misconduct narrative was false, anonymously sourced, and tainted by an admitted conflict and demanded preservation. The Journal Sentinel published after receiving that warning.

99. The Journal Sentinel knew the withdrawal had been decided and communicated before it announced its decision to publish, knew the campaign stated independent reasons, and was offered objective corroboration, yet used the withdrawal as the news peg for the accusations and placed the supposed probe near the beginning of the Withdrawal Article.

100. The October 28 notice identified the exact challenged statements, implications, and claimed true facts. The Journal Sentinel's failure to correct or remove the challenged matter after that notice is not offered as proof of original actual malice by itself, but is relevant to continuing publication, republication, damages, and any post–notice editorial decisions.

101. Based on the foregoing facts, the reporters and editors responsible for the challenged statements and implications published them with knowledge of their material falsity or while actually entertaining serious doubts about their truth. The factual basis for that allegation includes the prepublication information received by those individuals, the particular contradictions and objections communicated to them, and their subsequent reporting and publication decisions. In other words, the handling of the acknowledged conflict, contrary information, the compressed interval between acknowledgment of the conflict and publication, and anonymous sourcing, considered together with the other facts alleged, supports the inference that the responsible reporters and editors knew the challenged statements and implications were materially false or actually entertained serious doubts about their truth when they published them.

Statutory Notice

102. On October 28, 2026, Barnes, through counsel, sent written notice under Wis. Stat. § 895.05(2) to the Journal Sentinel and to the reporters and editors alleged to be responsible for the Articles.

103. The notice specified both Articles and their URLs; quoted the particular statements and summaries claimed to be false and defamatory; identified the defamatory implications; stated the claimed true facts; identified sources from which relevant facts could be confirmed; and demanded correction and retraction.

104. The notice was sent by certified mail and email. An executed affidavit of mailing records the certified–mail tracking numbers for each recipient.

105. Journal Sentinel representatives received the email notice at 7:52 a.m. on October 28. The notice was also delivered by certified mail to Spicuzza, Beck, and Borowski on October 30, and to Journal Sentinel on November 2.

106. On November 4, counsel for the Journal Sentinel and its representatives responded by letter advising that no statements would be corrected or retracted.

107. More than one week and a reasonable opportunity to correct have elapsed before commencement of this action.

108. The Journal Sentinel has not and will not publish a timely, unqualified correction or retraction satisfying § 895.05(2).

Harm

109. The Articles were published to a broad local, statewide, and national audience and were repeated or referenced by other outlets.

110. The false statements and implications concern Barnes's integrity, treatment of women, use of political power, fitness for public office, and professional conduct. They are defamatory on their face and are incompatible with the trust required for public service, advocacy, employment, and political leadership.

111. As a natural and foreseeable result, Barnes has suffered injury to reputation, humiliation, emotional distress, impairment of personal and professional relationships, loss of goodwill, and harm to present and future political, professional, speaking, media, advocacy, and employment opportunities.

112. Barnes does not allege that the Articles caused his July 30 withdrawal. He alleges independent reputational and consequential harm following publication.

113. The Journal Sentinel's conduct was malicious or in intentional disregard of Barnes's rights and warrants punitive damages under Wis. Stat. § 895.043, subject to proof and the Court's gatekeeping role.

COUNT I: DEFAMATION

Allegations Article and Associated Online Presentation

114. Barnes realleges the preceding paragraphs.

115. The Allegations Article and associated online presentation published the particular words quoted above, including that party officials "hired an outside law firm," that the party "launched the probe," that a review found nothing actionable because of lack of detail, and that three sources said Barnes had "repeatedly taken advantage of his status within the party to seek sexual encounters with young adult women."

116. Those statements and the headline, context, arrangement, omissions, and automated summary fairly and reasonably conveyed the factual implications that Barnes repeatedly exploited political status to obtain sexual encounters, that multiple women described such conduct, and that the party responded by initiating a formal outside investigation into his conduct.

117. The statements and implications were materially false for the reasons alleged above.

118. The Journal Sentinel published the statements and implications to third parties without privilege.

119. The Journal Sentinel acted with actual malice through the responsible reporters and editors identified above, whose knowledge and conduct are attributable to it.

120. The publication is defamatory because it tends to lower Barnes in the estimation of the community, expose him to public hatred, contempt, ridicule, or distrust, and deter others from associating or dealing with him in political, professional, civic, and personal life.

121. The publication caused the damages alleged above.

COUNT II: DEFAMATION

Withdrawal Article and Associated Online Presentation

122. Barnes realleges the preceding paragraphs.

123. The Withdrawal Article and associated online presentation published the particular words quoted above, including that Barnes's decision "came amid" reporting that he was taking advantage of his party role to have sexual encounters, that the party hired a law firm to look into similar claims, and that an "internal review and outside probe found nothing actionable."

124. In context and by juxtaposition, those words fairly and reasonably conveyed the factual implications that Barnes had been the subject of an internal and outside investigation into a repeated pattern of exploiting political status for sex and that those accusations or investigation caused or materially contributed to his withdrawal.

125. The statements and implications were materially false for the reasons alleged above.

126. The Journal Sentinel published the statements and implications to third parties without privilege.

127. The Journal Sentinel acted with actual malice through the responsible reporters and editors identified above, whose knowledge and conduct are attributable to it.

128. The publication is defamatory because it tends to lower Barnes in the estimation of the community, expose him to public hatred, contempt, ridicule, or distrust, and deter others from associating or dealing with him in political, professional, civic, and personal life.

129. The publication caused the damages alleged above.

WHEREFORE, Plaintiff requests judgment against Defendant Journal Sentinel, Inc. as follows:

(A) Compensatory damages in an amount to be determined at trial, including damages for reputational, emotional, professional, and economic injury;

(B) Punitive damages as permitted by Wis. Stat. § 895.043;

(C) Taxable costs, disbursements, and any recoverable interest;

(D) A declaration, to the extent legally available and appropriate after adjudication, identifying the challenged statements and implications found false and defamatory; and

(E) Any other relief the Court deems just and equitable under the circumstances.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE

Dated this 10th day of November, 2026.

BARTON CERJAK S.C.

/s/ Electronically signed by Michael J. Cerjak
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