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COMPLAINT  
ACCOUNTABILITY BOARD

The Response by

Amanda Mary-Myriah Hall

Respondent,

against

Robb Bradford Kahl,

Complainant

RESPONSE

I, Amanda Mary-Myriah Hall, respond as follows:

Mr. Robb Bradford Kahl brings the complaint in question to challenge the nomination signatures for one Amanda Mary-Mariah Hall. No such candidate exists for the 47<sup>th</sup> State Assembly District. Because Mr. Kahl failed to identify and address his complaint to a candidate for the district in question, his complaint should be summarily dismissed by the board.

Should the board, in its wisdom, elect not to dismiss Mr. Kahl's complaint on those grounds, respondent would make the following responses to Mr. Kahl's allegations:

1. Answering the allegations of Paragraph 1, the respondent does not have sufficient information to admit to or to deny the allegation made therein
2. Answering the allegations of Paragraph 2, the respondent does not have sufficient information to admit to or to deny the allegation made therein.
3. Answering the allegation of Paragraph 3, the respondent admits the allegation made therein.
4. Answering the allegation of Paragraph 4, the respondent admits the allegation made therein
5. Answering the allegation of Paragraph 5, the respondent denies that the allegation that the voting municipality listed on her nomination papers is incorrect. 1) Respondent resides at 707 South Dickinson Street, Madison, Wisconsin. Please see Exhibit A for further verification. 2) W10993 Lake View Drive Lodi, Wisconsin, which is the address listed on Complainant's Exhibits A, B, and C, is a previous address for the respondent. Thus, the voting municipality on respondent's nomination papers is correct.
6. Answering the allegation in Paragraph 6, respondent denies that the allegation that nomination paper-circulator Alexander James Brown's address as it is

listed certification of circulator on many nomination papers is incorrect. 1) The Alexander James Brown who circulated the nomination papers in question resides at 3564 Carncross Drive, in McFarland. Please see exhibits B ~~and C~~, for further verification. 2) The Alexander James Brown who circulated the nomination papers in question has never resided at the address listed in complainant's exhibits D and E. Owing to the commonality of the name, it must therefore be concluded that there is more than one Alexander James Brown residing in the Dane County area and that complainant's exhibits D and E refer to a different Alexander James Brown.

7. Answering the allegation in Paragraph 7, the respondent admits the allegation therein.

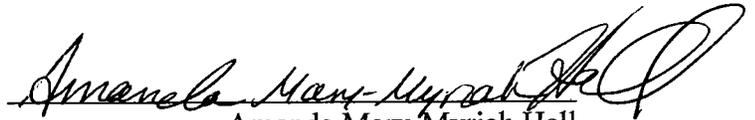
8. Answering the allegation in Paragraph 8, the respondent denies that the 33 signatures detailed in complainant's Exhibit F are invalid. Please see Exhibit D for a chart detailing the validity of the signatures questioned by complainant.

9. Answering the allegation in Paragraph 9, the respondent respectfully denies that a) the nomination papers in question were invalid due to candidate's address being incorrect, b) that any of the nomination papers circulated by Alexander James Brown were invalid, and c), that any of the nomination signatures in question are invalid or insufficient pursuant to Wis. Stat. §8.04 and 8.15 Wis. Admin. Code § GAB 2.05 and 2.07. The board should therefore find that the Respondent meet the number of signatures required by Wis. Stat. § 8.15(6)(d) to be placed on the ballot for the November 6<sup>th</sup>, 2012 election in the 47<sup>th</sup> State Assembly district.

I, being first duly sworn upon oath, state that I personally read the above response and that the above responses are true and correct based upon my personal knowledge and, as to those responses stated on my personal knowledge and belief, I believe them to be true.

Dated this 6<sup>th</sup> day of June, 2012.

Respectfully submitted,

  
Amanda Mary-Myriah Hall

Subscribed and sworn to before me  
This 6<sup>th</sup> day of June, 2012

  
Notary Public

My commission is permanent / expires \_\_\_\_\_

EXHIBIT A

Customer Profile - AMANDA M HALL

|                |   |                   |               |
|----------------|---|-------------------|---------------|
| Name           | AMANDA M HALL                             |                   |               |
| Address        | 707 S DICKINSON ST                        |                   |               |
|                | MADISON WI 53703-3805                     |                   |               |
| Customer Type  | Retail Customer                           | Language          | UNITED STATES |
| SSN/TIN        | 465-67-4328                               | Personal Phone    | 319-331-9052  |
| Date of Birth  | 04/09/1984                                | Business Phone    | 319-331-9052  |
| MMN            | SARGENT                                   | Employer          | UNEMPLOYED    |
| STN DNC        | No Phone Marketing Allowed                | USB Employee Flag |               |
| Privacy Choice | Marketing Allowed - Share Data within USB |                   |               |
| Personal Email | HALLAMANDA04@YAHOO.COM                    |                   |               |
| Business Email | VICTORY.HALL@GMAIL.COM                    |                   |               |

Customer Profile

Add to Session      Cust Maint      New Search      Cancel      Exit

Account Type

SILVER PKG CHECKING

Ledger Balance

\$522.55

Available Balance

\$467.06

Account Address

707 S DICKINSON ST

MADISON WI 53703-3805

UNITED STATES

Related Customers

| Name             | Relation |
|------------------|----------|
| PETER A BARTOSCH | JOF      |
| AMANDA M HALL    | JOO      |

Account Detail

History

Acct Maint

Cancel

Exit





EXHIBIT B

**WISCONSIN**  
DRIVER LICENSE  
B65001082176708



Turns 21 on 03-26-2013

*Alex J Brown*

**ALEXANDER J  
BROWN**  
3584 CARNCROSS DR  
MC FARLAND, WI 53558

Issued 03-17-2011  
Expires 03-26-2019  
DOB 03-26-1992

# EXHIBIT D

| Page # | Line # | First Name | Last Name | Response/Explanation   |
|--------|--------|------------|-----------|--|
| 2      | 3      | n/a        | Urbach    | Printed Name of voter is not a necessary element to a valid nomination signature; here, the absence of voter's first name in print does not disqualify signature   |
| 2      | 6      | Alexander  | Brown     | Address is correct, see paragraph 6 of the response, and paragraphs 1 and 2 of Exhibit F   |
| 3      | 1      | Theresa    | Balsiger  | Handwriting between the two signatures, while similar, is clearly different, see Exhibit E paragraph 2   |
| 3      | 1      | Ryan       | Balsiger  | Handwriting between the two signatures, while similar, is clearly different, see Exhibit E paragraph 2   |
| 5      | 5      | Ron        | Wood      | Voter in fact does live outside of district and this signature was submitted in error  |
| 5      | 8      | Andrew     | Burch     | Based on new knowledge of previous signature, respondent concedes this signature is invalid  |
| 8      | 3      | Harold     | Tipler    | Please see affidavit of Alexander Brown, Exhibit E paragraph 3   |
| 8      | 6      | Appetta    |           | Printed name of voter is not a necessary element to a valid nomination signature; here, the absence of voter's first name in print does not disqualify signature   |
| 10     | 6      | Tyler      | Byrnes    | Please see affidavit of Alexander Brown, Exhibit E paragraph 4   |
| 12     | 2      | Phillip    | Spranger  | Respondent Amanda Hall and Alexander Brown were both present for and witnessed the signatures on the paper in question. Respondent Hall initialed a correction on one of the lines, but, later on, Brown signed as circulator. Please also see Exhibits E and F, paragraphs 5 and 3 respectively |
| 12     | 3      | Nancy      | Gray      | As to existence of address, please see Exhibit E paragraph 6. As to irregularity of circulator initials and circulator certification, this irregularity would not invalidate entire page   |
| 12     | 4      | Jon        | Krueger   | As to irregularity of circulator initials and circulator certification, this irregularity would not invalidate entire page   |
| 12     | 5      | Charles    | Hoskee    | As to irregularity of circulator initials and circulator certification, this irregularity would  |

## **Exhibit E**

### **Affidavit of Alexander James Brown, 3564 Carncross Drive, McFarland, Wisconsin 53558**

I hereby swear to and affirm the following:

1. That I live at 3564 Carncross Drive, McFarland, Wisconsin 53558, and have never lived in Middleton. The Alexander James Brown mentioned in Mr. Robb Kahl's complaint as residing in Middleton is not me.
2. That I personally collected and witnessed the nomination signatures of Ms. Theresa Balsinger and Mr. Ryan Balsinger of 4517 Shore Acres Road in Monona and they each filled in their home address themselves.
3. That I personally collected and witnessed the nomination signature of Mr. Harold Tipler of 4616 Schofield Street in Monona at that same address, and that the address exists.
4. That I personally collected and witnessed the nomination signature of Mr. Tyler Byrnes of 2222 Martin Street in the town of Madison at that same address, and that the address exists.
5. That I collected and witnessed all of the signatures on the nomination paper numbered '12' with respondent Amanda Hall, and that she initialed a correction on the municipality on line 2 while I later signed as the circulator.
6. That I personally collected and witnessed the nomination signature of Ms. Nancy Gray of 2105 Carver Street in the town of Madison at that same address, and that the address exists.
7. That I personally collected and witnessed the nomination signature of Mr. Gerald Ringlund of 1909 Carver Street in the town of Madison at that same address, and that the address exists.
8. That I personally collected and witnessed the signatures of Mr. Thomas Johnke and Ms. Michaela Johnke of 3026 Yarmouth Greenway Drive in the city of Fitchburg and that they erred in listing their municipality as the town of Fitchburg.
9. That I personally collected and witnessed the signature of Ms. Laura Hermanson of 6401 Roselawn Avenue in the city of Monona at that same address, and that the address exists.

Exhibit F

Affidavit of Amanda Mary-Myriah Hall  
707 S. Dickinson Street Madison, Wisconsin 53703

I hereby swear to and affirm the following:

1. That I reside at 707 S. Dickinson Street in the city of Madison, the same address which appears on my nomination papers for the 47<sup>th</sup> Assembly District.
2. That I resided at W10993 Lake View Drive in the town of Lodi within the last year, and that it is an address which is listed on public documents pertaining to me.
3. That I collected and witnessed all of the signatures on the nomination paper numbered '12' with Alexander Brown, and that I initialed a correction on the municipality on line 2 while Mr. Brown later signed as the circulator.
4. That my initials, 'AH,' appear just under the house number '1805' on the nomination signature of Ms. Alissa Andkus on the nomination paper numbered '18.'
5. That I personally collected and witnessed the nomination signature of Ms. Shirley A. Sanders of 5531 Osborn Drive in the village of McFarland on May 24<sup>th</sup>, 2012, and that she filled in the date on her signature. She was using a pen for which the ink was very thick and the ink smudged the paper a bit.
6. That I personally collected and witnessed the nomination signature of Ms. Kristina Alpire of 5513 Osborn Drive in the village of McFarland on May 25<sup>th</sup>, 2012, and that she corrected the date of her signature herself, which is why my initials do not appear beside the apparent correction.
7. That while I was reviewing each nomination signature for its validity, I accidentally crossed out the signature of Mr. David Brale of 5700 Midmoor in the city of Monona, but that his address and signature are valid.
8. That when I explained the error explained above to the gentleman at the Government Accountability Board office who took in my nomination papers on June 1<sup>st</sup>, 2012, that he initialed the signature described above as being valid as well.
9. That I personally collected and witnessed the signature of Ms. Lindsey Delarlo of 1809 Carver Street in the town of Madison at that same address and that the address exists.