

HAND DELIVERED

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STATE OF WISCONSIN
GOVERNMENT ACCOUNTABILITY BOARD

11 JUN 24 PM 3:44

GOVERNMENT
ACCOUNTABILITY BOARD

The Complaint of the Democratic Party of Wisconsin,

By Jacob Hajdu,

Complainant,

against

John Nygren,

Respondent

VERIFIED COMPLAINT

On behalf of the Democratic Party of Wisconsin, I, primarily based on public records, but also on information and belief, hereby allege as follows:

1. This Complaint is brought against John Nygren pursuant to Wisconsin GAB Chapter 2.07, Wisconsin Administrative Code.

2. I am a qualified elector in and resident of the State of Wisconsin. I am the Political Director of the Democratic Party of Wisconsin, 110 King Street, Suite 203, Madison, Wisconsin 53703, on behalf of which I bring this Complaint.

3. Respondent maintains an address at N2118 Keller Rd, Marinette, WI 54143.

4. On or about June 20, 2011, Respondent filed nomination papers containing 424 signatures with the Government Accountability Board to be placed on the ballot for the July 19, 2011 recall election in the 30th State Senate District.

5. Wis. Stat. 8.15(6)(c) provides that the number of required signatures on nomination papers for the office of state senator shall be not less than 400 nor more than 800 electors.

6. Respondent's nomination papers contained a total of 39 signatures with insufficiencies pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code, bringing the total number of valid signatures submitted down to 385. A copy of the insufficient signatures is attached hereto and incorporated herein as Exhibit "A."

7. Complainant respectfully submits that these facts warrant the Board's attention, and the Board should take prompt action to eliminate from the nomination papers filed by

Respondent all signatures that are insufficient pursuant to GAB Chapters 2.05 and 2.07, Wisconsin Administrative Code and should find that Respondent does not meet the number of signatures required by Wis. Stat. 8.15(6)(c) to be placed on the ballot for the July 19, 2011 recall election in the 30th State Senate district.

I, , being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based upon my personal knowledge and my review of public records and, as to those allegations stated on my information and belief, I believe them to be true.

Dated this 24 day of June, 2011.

Respectfully submitted,



Jacob Hajdu, Political Director
Democratic Party of Wisconsin

Subscribed and sworn to before me
this 24th day of June, 2011.



Notary Public

My commission expires: 12-2-2012

CERTIFICATE OF SERVICE

I, , hereby certify that on this 24 day of June, 2011, a true and correct copy of this Complaint was forwarded via U.S. Mail, first class postage prepaid and properly addressed, to Respondent, John Nygren, N2118 Keller Rd, Marinette, WI 54143.



Jacob Hajdu, Complainant

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Page Number	Signature Number	Date Collected	Voting Address	Municipality	Circulator	Insufficiency
						GOVERNMENT ACCOUNTABILITY BOARD
10	2	6/12/2011	130 Oak St Peshigo	Peshigo	Patrick Testin	Checked two municipality boxes
14	7	6/14/2011	930 Hwy 32 Pulaski	Chase	Patrick Testin	Checked village, Chase. Village of Chase does not exist.
19	9	6/17/2011	2746 Sussex Rd	Green Bay	Andrew Potts	Checked two municipality boxes
21	9	6/17/2011	2793 Sunway Lane	Howard	Andrew Potts	Checked two municipality boxes
26	8	6/18/2011	1218 Shawano Ave	Green Bay	Brooke Froelich	No municipality box checked
27	2	6/18/2011	1117 Langlade Ave	Green Bay	Brooke Froelich	Checked two municipality boxes
31	9	6/18/2011	3097 Glendale Ave	Green Bay	Patrick Roetker	Checked two municipality boxes
38	8	6/18/2011	1117 Langlade Ave.	Green Bay	Andrew Potts	Checked two municipality boxes
49	10	6/18/2011	426 N. Peck	Peshigo	Eugene Frank	No municipality box checked
12	2	6/14/2011	N2669 Naple Rd Pulaski	Village Pulaski	Patrick Testin	Out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
17	2		100130 County B Coleman	Town Brazeau	Eugene Frank	Out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
18	4	6/16/2011	1431 S Irwin Ave	City of Green Bay	Andrew Potts	Out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
18	9	6/17/2011	3692 Main St	City of Green Bay	Andrew Potts	Out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
20	1	6/17/2011	1400 Packerland Dr E3	City of Green Bay	Andrew Potts	Out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx

Exhibit "A"
 Summary of Insufficiencies in John Nygren's Nomination Petitions

Page Number	Signature Number	Date Collected	Voting Address	Municipality	Circulator	Insufficiency
20	2	6/17/2011	1400 Packerland Dr E3	City of Green Bay	Andrew Potts	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
20	5	6/17/2011	337 W. Saint Augustine St	Village of Pulaski	Andrew Potts	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
20	6	6/17/2011	1331 Bellevue St #229	City of Green Bay	Andrew Potts	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
23	2	6/17/2011	3136 Coronet Way	City of Green Bay	Patrick Testin	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
31	3	6/18/2011	2156 Buffhead Ln	Green Bay	Patrick Roetker	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
33	5	6/18/2011	2964 Apple Ridge Ct	City of Green Bay	Patrick Roetker	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
37	7	6/18/2011	2311 E River Dr	City of Green Bay	Andrew Potts	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
40	6	6/18/2011	2394 Canter Lane East	City of Green Bay	Ben Voelkel	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
41	1	6/16/2011	1932 Mulberry Ln	City of Green Bay	Ben Voelkel	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
41	3	6/18/2011	2987 Holmgren Way #3	City of Green Bay	Ben Voelkel	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx

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Page Number	Signature Number	Date Collected	Voting Address	Municipality	Circulator	Insufficiency
41	8	6/18/2011	2985 Ferrdale Dr	City of Green Bay	Ben Voelkel	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
43	1	6/18/2011	2221 S Webster #119	City of Green Bay	Kirsten Seeman	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
43	9	6/18/2011	2186 Garden Grove	City of Green Bay	Kirsten Seeman	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
46	1	6/18/2011	2552 Hazelwood	City of Green Bay	Kristen Seeman	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
56	5	6/21/2011	1717 Royal Crown Ct	City of Green Bay	Charlotte Klenke	out of district according to http://legis.wisconsin.gov/w3asp/waml/waml.aspx
9	3	6/12/2011	Oconto	Town of Oconto	Patrick Testin	no address listed
21	10	6/17/2011	114 S Wasington St	...	Andrew Potts	Illegible Municipality, address googles as De Pere which is out of district
8	6	6/12/2011	328 Adam St Oconto	City Oconto	John Nygren	Checked two municipality boxes
21	10	6/17/2011	114 S Wasington St	...	Andrew Potts	Illegible Municipality
9	4	6/12/2011	816 Kellogg St. Green Bay	City Green Bay	Patrick Testin	Signature signed by same person as signature number 5 of same page
9	5	6/12/2011	816 Kellogg St. Green Bay	City Green Bay	Patrick Testin	Signature signed by same person as signature number 4 of same page

Exhibit "A"

Summary of Insufficiencies in John Nygren's Nomination Petitions

Page Number	Signature Number	Date Collected	Voting Address	Municipality	Circulator	Insufficiency
17	4		7111 Old 15 Road Oconto	Town Little River	Eugene Frank	No address listed in box that corresponds with signature number 4
52	7	6/20/2011	2560 Van Belt Rd	City of Green Bay	Andrew Potts	Signature in same handwriting as signature 8 of same page
52	8	6/20/2011	2560 Van Belt Rd	City of Green Bay	Andrew Potts	Signature in same handwriting as signature 7 of same page
20	8	6/17/2011	630 East Frontage #82	Little Suamico	Andrew Potts	Not a valid residence