

HAND DELIVERED

State of Wisconsin
Government Accountability Board

RECEIVED
JAN 14 2013
ACCOUNTABILITY BOARD

Assembly Democratic Campaign Committee,
By Joel Gratz,

Complainant,

Against

Nancy VenderMeer,

Respondent.

VERIFIED COMPLAINT

I, Joel Gratz, based on information and belief, hereby allege as follows:

1. This Complaint is brought against Nancy VanderMeer 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 Executive Director of the Assembly Democratic Campaign Committee (ADCC), 110 King Street, Suite 203, Madison, WI 53073.
3. Respondent maintains an address at 18940 Eden Avenue, Tomah, WI 54660.
4. On or about May 29, 2012, Respondent filed nomination papers with the Government Accountability Board to be placed on the November 6, 2012 ballot for State Representative in the 70th Assembly District. The Respondent's nomination papers contained approximately 398 signatures. A total of 368 signatures have been initially counted by GAB staff as valid.
5. Respondent's nomination papers contained a total of 358 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 40.
6. Respondent submitted numerous nomination paper pages in which the circulator failed to provide their own municipality of residence. These insufficiencies include, but may not be limited to, the following:
 - a. Pages 1, 2, 3, 4, 26 and 27 circulated by Doris Hall consisting of 59 signatures provide no municipality for the circulator,
 - b. Pages 5, 6, 9, 14, 15, 16, 17, and 34 circulated by Gail Roddatz consisting of 76 signatures provide no municipality for the circulator,
 - c. Pages 8 and 10 circulated by David Wisnaski consisting of 20 signatures provide no municipality for the circulator,
 - d. Page 18 circulated by Michael Oswald consisting of 10 signatures provide no municipality for the circulator,

- e. Page 19 circulated by Sandra Wagner consisting of 10 signatures provide no municipality for the circulator,
 - f. Pages 20, 21, 22, 23, 25, 28, 29, 30, 32, 33, 40, 41 and 42 circulated by Nancy VanderMeer consisting of 125 signatures provide no municipality for the circulator,
 - g. Page 24 circulated by Ann Anderson consisting of 9 signatures provide no municipality for the circulator,
 - h. Page 31 circulated by Kathy Steinmetz consisting of 9 signatures provide no municipality for the circulator,
 - i. Pages 35, 36 and 39 circulated by Daniel Cary consisting of 20 signatures provide no municipality for the circulator, and
 - j. Pages 37 and 38 circulated by Caroll Chinnock consisting of 20 signatures provide no municipality for the circulator.
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.

I, Joel Gratz, being dually sworn upon oath, state that I personally read the above complaint and that the above listed allegations are true and correct based upon my personal knowledge and my review of the nomination papers and other public records, and as to those allegations stated on my information and believe, I believe them to be true.

Dated this 4 day of June, 2012.

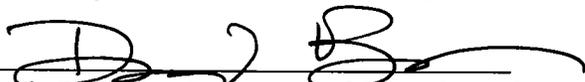
Respectfully submitted,



 Joel Gratz

Subscribed and sworn to before me

this 4 day of June, 20 12

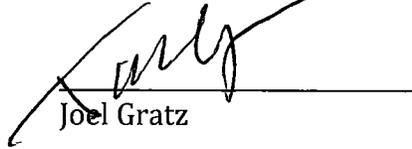


 (signature of person authorized to administer oaths)

My commission expires _____ or is permanent
 Notary Public or _____

CERTIFICATE OF SERVICE

I, Joel Gratz, hereby certify that on this 14 day of June, 2012, a true and correct copy of this complaint was forwarded via U.S. Mail, first class postage prepaid and properly addressed to Nancy VanderMeer, Respondent, 18940 Eden Ave, Tomah, WI 54660.


Joel Gratz