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State of Wisconsin
Government Accountability Board

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GOVERNMENT
ACCOUNTABILITY BOARD

Assembly Democratic Campaign Committee,
By Joel Gratz,

Complainant,

Against

Tom Lamberson,

Respondent.

VERIFIED COMPLAINT

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

1. This Complaint is brought against Tom Lamberson 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 1204 Enterprise Drive, Verona, WI.
4. On or about May 31, 2012, Respondent filed nomination papers with the Government Accountability Board (GAB) to be placed on the November 6, 2012 ballot for State Representative in the 8th Assembly District. The Respondent's nomination papers contained approximately 243 valid signatures as determined by initial review of GAB staff.
5. Respondent's nomination papers contained a total of 243 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 zero.
6. Respondent's nomination papers are insufficient and flawed in that on each and every page Respondent failed to completely provide the information clearly labeled "Name of municipality for mailing purposes." Respondent used the nomination paper blank provided by GAB which plainly provides a set of information which must be provided by the candidate circulating the nomination papers, but Respondent failed to fully complete this information necessary to become a candidate.
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, 2012.


(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 4 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 Tom Lamerson, 1204 Enterprise Drive, Madison, WI 53593.


Joel Gratz