

STATE OF WISCONSIN
GOVERNMENT ACCOUNTABILITY BOARD

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GOVERNMENT ACCOUNTABILITY BOARD

The Complaint by

Robb Bradford Kahl,

Complainant,

against

Amanda Mary-Mariah Hall,

Respondent

VERIFIED COMPLAINT

I, Robb Bradford Kahl, allege as follows:

1. This Complaint is brought against Amanda Mary-Mariah Hall pursuant to Wis. Stat. §§ 8.04 and 8.15 and Wis. Admin. Code GAB Ch. 2.07.
2. I am a qualified elector in and resident of the State of Wisconsin, residing at 5700 Winnequah Rd., Monona, WI 53716.
3. Respondent maintains an address at 707 South Dickinson Street, Madison, WI 53703.
4. On or about June 1, 2012, Respondent filed nomination papers containing 210 signatures with the Government Accountability Board to be placed on the ballot for the November 6, 2012 election in the 47th State Assembly District.
5. Respondent's voting municipality information included on her nomination papers may be incorrect. Although Respondent's nomination papers indicate that her mailing and voting addresses are in Madison, Wisconsin, Respondent listed her address as W10993

Lake View Drive, Lodi, Wisconsin, 53555 in at least three recent public documents: (a) two recent court cases against Respondent in Dane and Columbia Counties (see attached reprints from the Wisconsin Circuit Court Access (“WCCA”) system, incorporated herein as Exhibit “A”), (b) her voter registration (see attached reprint of Respondent’s voter information and recent voting history from the Wisconsin Voter Public Access (“WVPA”) system, incorporated herein as Exhibit “B”), and (c) her information currently on file with the State Bar of Wisconsin (see attached reprint from www.wisbar.org, incorporated herein as Exhibit “C”). Because her address information is incorrect on every nomination paper submitted with the Board, all of Respondent’s nomination papers should be rejected.

6. The residency information of Respondent’s principal nomination-paper circulator may be incorrect. Although Respondent’s circulator, Alexander J. Brown, listed his address on the certifications of the nomination papers he purportedly circulated as 3564 Camcross Drive, McFarland, Wisconsin, he has indicated his address as 5317 Century Avenue, #5, Middleton, Wisconsin, 53562 in at least two recent public documents: (a) a recent misdemeanor conviction for possession of THC from late 2011 (see attached reprint from the WCCA system, incorporated herein as Exhibit “D”) and (b) his voter registration information (see attached reprint of Mr. Brown’s voter information from the WVPA system, incorporated herein as Exhibit “E”). Because his address information is incorrect on 20 of 27 of the nomination papers submitted with the Board, those 20 nomination papers should be rejected.

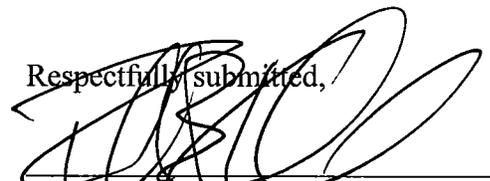
7. Wis. Stat. § 8.15(6)(d) provides that the number of required signatures on nomination papers for the representatives to the assembly shall be not less than 200 nor more than 400 electors.

8. In addition to the general insufficiencies noted in paragraphs 5 and 6, above, Respondent's nomination papers contained a total of 33 signatures with insufficiencies pursuant to Wis. Stat. §§ 8.04 and 8.15 and Wis. Admin. Code §§ GAB 2.05 and 2.07, bringing the total number of valid signatures submitted down to 177. A chart detailing the insufficient signatures is attached hereto and incorporated herein as Exhibit "F."

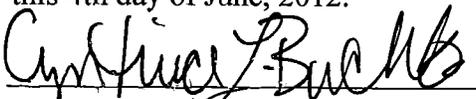
9. Complainant respectfully submits that these facts warrant the Board's attention, and the Board should take prompt action to eliminate in the alternative, (a) all nomination papers filed by Respondent, (b) all nomination papers filed by Respondent and circulated by Alexander J. Brown, or (c) from the nomination papers filed by Respondent all signatures that are insufficient pursuant to Wis. Stat. §§ 8.04 and 8.15 and Wis. Admin. Code §§ GAB 2.05 and 2.07. The Board should therefore find that Respondent does not meet the number of signatures required by Wis. Stat. § 8.15(6)(d) to be placed on the ballot for the November 2, 2012 election in the 47th State Assembly 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 4th day of June, 2012.

Respectfully submitted,

Robb Bradford Kahl

Subscribed and sworn to before me
this 4th day of June, 2012.



Notary Public

My commission expires: is permanent

CERTIFICATE OF SERVICE

I, Robb Bradford Kahl, hereby certify that on this 4th day of June, 2012, a true and correct copy of this Complaint was served no later than the time of filing of this Complaint via U.S. Mail, first class postage prepaid and properly addressed, to Respondent, Amanda Mary-Mariah Hall, 707 South Dickinson Street, Madison, WI 53703.



Robb Bradford Kahl, Complainant

Wisconsin Circuit Court Access (WCCA)

Dane County vs. Amanda Mary-Myriah Hall

Dane County Case Number 2012TR003590

Filing Date	Case Type	Case Status
02-20-2012	Traffic Forfeiture	Closed
Defendant Date of Birth	Address	
04-1984	W10993 Lake View Dr, Lodi, WI 53555	

Charge(s)

Count No.	Statute	Description	Severity	Disposition
1	346.57(4)(gm)	Speeding on Freeway (1-10 MPH)	Forf. U	Guilty Due to No Contest Plea

Defendant Owes the Court: \$ 200.50

Responsible Official	Prosecuting Agency	Prosecuting Attorney	Defense Attorney
Commissioner, Initial Appearance	District Attorney		

Defendant

Defendant Name	Date of Birth	Sex	Race ¹
Hall, Amanda Mary-Myriah	04-1984	Female	Caucasian
Address	Address Updated On		
W10993 Lake View Dr, Lodi, WI 53555	02-11-2012		
JUSTIS ID	Finger Print ID		

Charge(s)/Sentence(s)

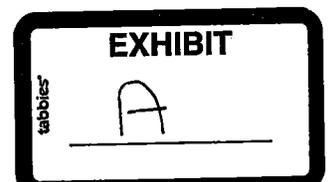
Charge Detail

The Defendant was charged with the following offense:

Count No.	Statute Cite	Description	Severity	Offense Date	Plea
1	346.57(4)(gm)	Speeding on Freeway (1-10 MPH)	Forf. U	02-11-2012	No Contest on 03-13-2012

On 03-13-2012 there was a finding of:

Action	Court Official
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Guilty Due to No Contest Plea Commissioner, Initial Appearance

On 03-13-2012 the following was ordered:

Sentence Time Begin Date Notes
 Forfeiture / Fine

Citations

Citation P7706053

Bond Amount	Deposit Type	Appearance Date and Time	Mandatory
\$ 200.50	None	03-13-2012 at 10:30 am	No
Name		Date of Birth	Sex
Hall, Amanda Mary-Myriah		04-1984	Female
Address			Address Updated On
W10993 Lake View Dr, Lodi, WI 53555			02-11-2012
Plate Number	State	Expiration	VIN
548NXK	WI	2012	3N1CB51D74L863816
Issuing Agency	Officer Name	Violation Date	MPH Over
Dane County Sheriff		02-11-2012	10
Plaintiff Agency	Ordinance or Statute	Statute	Charge Description
Dane County	Statute	346.57(4)(gm)	Speeding on Freeway (1-10 MPH)
Severity			
Forf. U			

Total Receivables

Court Assessments	Adjustments	Paid to the Court	Probation/Other Agency Amount⁴	Balance Due to Court	Due Date⁵
\$ 200.50	\$ 0.00	\$ 0.00	\$ 0.00	\$ 200.50	05-14-2012

¹ The designation listed in the Race field is subjective. It is provided to the court by the agency that filed the case.

² Non-Court activities do not require personal court appearances. For questions regarding which court type activities require court appearances, please contact the Clerk of Circuit Court in the county where the case originated.

³ Includes collection agency fees; bankruptcy discharge of debt; Department of Revenue collection fees; and forgiven debts due to indigence, death, time served, or community service.

⁴ Some amounts assessed by the courts are collected by the Department of Corrections or other agencies. This column is rarely updated by the courts and may be less than the actual amount owed.

⁵ For cases with multiple assessments, the due date represents the assessment with the latest date.

⁶ Your payment may not be processed immediately.

Wisconsin Circuit Court Access (WCCA)
Columbia County vs. Amanda Mary-Myriah Hall
Columbia County Case Number 2012TR001392

Filing Date	Case Type	Case Status
03-05-2012	Traffic Forfeiture	Closed
Defendant Date of Birth	Address	
04-1984	W10993 Lake View Dr, Lodi, WI 53555	
Branch Id	DA Case Number	
1		

Charge(s)

Count No.	Statute	Description	Severity	Disposition
1	346.57(4)(h)	Speeding in 55 MPH Zone (16-19 MPH)	Forf. U	Guilty Due to No Contest Plea

Defendant Owes the Court: \$ 200.50

Responsible Official	Prosecuting Agency	Prosecuting Attorney	Defense Attorney
George, Daniel	District Attorney		

Defendant

Defendant Name	Date of Birth	Sex	Race ¹
Hall, Amanda Mary-Myriah	04-1984	Female	Caucasian
Address			Address Updated On
W10993 Lake View Dr, Lodi, WI 53555			02-27-2012
JUSTIS ID	Finger Print ID		

Charge(s)/Sentence(s)

Charge Detail

The Defendant was charged with the following offense:

Count No.	Statute Cite	Description	Severity	Offense Date	Plea
1	346.57(4)(h)	Speeding in 55 MPH Zone (16-19 MPH)	Forf. U	02-27-2012	No Contest on 04-02-2012

On 04-02-2012 there was a finding of:

Action	Court Official
Guilty Due to No Contest Plea	George, Daniel

On 04-02-2012 the following was ordered:

Sentence	Time	Begin Date	Notes
Forfeiture / Fine			

Citations

Citation K5000612

Bond Amount	Deposit Type	Appearance Date and Time	Mandatory
\$ 200.50	None	04-02-2012 at 10:00 am	No
Name		Date of Birth	Sex
Hall, Amanda Mary-Myriah		04-1984	Female
Address			Address Updated On
W10993 Lake View Dr, Lodi, WI 53555			02-27-2012
Plate Number	State	Expiration	VIN
548NXK	WI	2012	3N1CB51D74L863816
Issuing Agency	Officer Name	Violation Date	MPH Over
Columbia County Sheriff Dept	Belay, Anthony L	02-27-2012	17
Plaintiff Agency	Ordinance or Statute	Statute	Charge Description
Columbia County	Statute	346.57(4)(h)	Speeding in 55 MPH Zone (16-19 MPH)
Severity			
Forf. U			

Total Receivables

Court Assessments	Adjustments³	Paid to the Court	Probation/Other Agency Amount⁴	Balance Due to Court	Due Date⁵
\$ 200.50	\$ 0.00	\$ 0.00	\$ 0.00	\$ 200.50	06-01-2012

¹ The designation listed in the Race field is subjective. It is provided to the court by the agency that filed the case.

² Non-Court activities do not require personal court appearances. For questions regarding which court type activities require court appearances, please contact the Clerk of Circuit Court in the county where the case originated.

³ Includes collection agency fees; bankruptcy discharge of debt; Department of Revenue collection fees; and

forgiven debts due to indigence, death, time served, or community service.

- 4 Some amounts assessed by the courts are collected by the Department of Corrections or other agencies. This column is rarely updated by the courts and may be less than the actual amount owed.
- 5 For cases with multiple assessments, the due date represents the assessment with the latest date.
- 6 Your payment may not be processed immediately.



Wisconsin Voter Public Access

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Voter Information

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Name and Address

Last Name	First Name	Middle Name	Suffix
HALL	AMANDA	MARY-MYRIAH	
Address Line 1	Address Line 2	City	Zipcode
W10993 LAKE VIEW DR		LODI	535551535

Registration Information

Birthdate	Reg Date	Status	Status Reason
4/9/1984	10/29/2010	Active	Registered

Mailing Address

Address Line 1	Address Line 2	Address Line 3	City	State	Zipcode

- [View your Voting History](#)
- [View your Absentee Ballot Status](#)

Below is your polling place location and sample ballot for the following election:

6/5/2012 - 2012 JUNE 5 RECALL ELECTION

Note: Polling Place Locations can change from election to election.

Polling Place Location

Location

LODI MUNICIPAL BUILDING
125 LODI ST
LODI
535551218

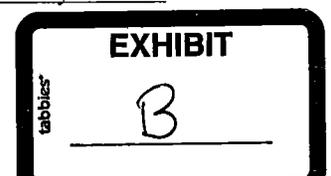
Hours

7:00 AM - 8:00 PM

[Polling Place Location Accessibility Details](#)

Sample Ballot

[View sample ballot](#)



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[Click Here to View Office Holders and Voting Districts based on the 2010 Census Redistricting](#)

[Click Here to View Office Holders and Voting Districts based on the 2000 Census Redistricting](#)

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Voting History

HALL, AMANDA MARY-MYRIAH

Voting History

Election Date	Election Name	Method
5/8/2012	2012 MAY 8 RECALL PRIMARY/ELECTION	Absentee
4/5/2011	2011 SPRING ELECTION	Absentee
2/15/2011	2011 SPRING PRIMARY	At Polls
11/2/2010	2010 GENERAL ELECTION	Absentee
11/4/2008	2008 PRESIDENTIAL AND GENERAL ELECTION	Absentee
2/1/2006	2/1/2006 ELECTION	At Polls

Voter Public Access has complete data starting in 2006. Prior to 2006, data may be incomplete. Questions about your voter information should be directed to your municipal clerk's office .

[Click Here to View Your Clerk Contact Information](#)

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Lawyer Search

*The license status and member type information provided reflects this lawyer's current information. For historical information on their license status, please contact **Membership**.*

Atty. Amanda Mary-Myriah Hall

W10993 Lake View Dr
Lodi, WI 53555-1535

Phone: (319) 331-9052

Email: ammhalesq@gmail.com

Member ID: 1083747

License status:

Good

Member type:

Active

County: Columbia

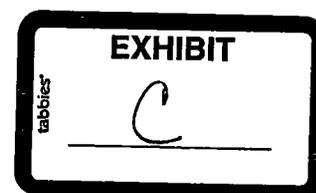
Graduation Year: 2009

Law School: Suffolk U

Wisconsin Admission: 3/7/2011

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Wisconsin Circuit Court Access (WCCA)

State of Wisconsin vs. Alex J. Brown

Sauk County Case Number 2011CM000595

Filing Date	Case Type	Case Status
10-18-2011	Criminal	Closed
Defendant Date of Birth	Address	
09-23-1989	5317 Century Ave #5, Middleton, WI 53562	
Branch Id	DA Case Number	
1	2011SA002401	

Charge(s)

Count No.	Statute	Description	Severity	Disposition
1	961.41(3g)(e)	Possession of THC	Misd. U	Guilty Due to No Contest Plea

Defendant Owes the Court: \$ 373.50

Responsible Official	Prosecuting Agency	Prosecuting Attorney	Defense Attorney
Taggart, Patrick	District Attorney	Harper, Jennifer A.	

Defendant

Defendant Name	Date of Birth	Sex	Race¹
Brown, Alex J.	09-23-1989	Male	Caucasian
Address			Address Updated On
5317 Century Ave #5, Middleton, WI 53562			10-18-2011
JUSTIS ID	Finger Print ID		

Charge(s)/Sentence(s)

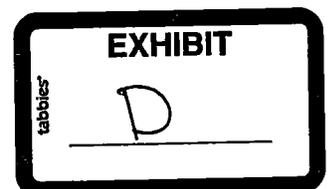
Charge Detail

The Defendant was charged with the following offense:

Count No.	Statute Cite	Description	Severity	Offense Date	Plea
1	961.41(3g)(e)	Possession of THC	Misd. U	09-24-2011	Guilty on 01-27-2012

On 01-27-2012 there was a finding of:

Action	Court Official
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Guilty Due to No Contest Plea Taggart, Patrick

On 01-27-2012 the following was ordered:

Sentence	Time	Begin Date	Notes
Forfeiture / Fine			
Expunge w/ pay amount due			Defendant may apply for expungement if law abiding & fine paid in full, record may be expunged, 973.015.

Total Receivables

Court Assessments	Adjustments ³	Paid to the Court	Probation/Other Agency Amount ⁴	Balance Due to Court	Due Date ⁵
\$ 473.50	\$ 0.00	\$ 100.00	\$ 0.00	\$ 373.50	03-27-2012

Judgment for money

County	Case Number	Case Caption	
Sauk	2011CM000595	State of Wisconsin vs. Alex J. Brown	
Judgment/Lien Date	Total Amount	Warrant Number	
03-29-2012	\$ 373.50		
Date and Time Docketed	Service/Event Date		
03-29-2012 at 11:58 am			
Satisfaction	Judgment Status	Date	Type Of Tax
No			

Property/Remarks

Judgment Parties

Party Type	Name	Dismissed	Status	Address
Debtor	Brown, Alex J.	No	Active	5317 Century Ave #5, Middleton, WI 53562
Creditor	Sauk County Clerk of Circuit Court	No	Active	P.O. Box 449, 515 Oak Street, Baraboo, WI 53913

Costs / Amounts

Description	Amount
Judgment amount	\$ 373.50

1 The designation listed in the Race field is subjective. It is provided to the court by the agency that filed the case.

2 Non-Court activities do not require personal court appearances. For questions regarding which court type activities require court appearances, please contact the Clerk of Circuit Court in the county where the case

originated.

³ Includes collection agency fees; bankruptcy discharge of debt; Department of Revenue collection fees; and forgiven debts due to indigence, death, time served, or community service.

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Voter Information

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Name and Address

Last Name	First Name	Middle Name	Suffix
BROWN	ALEXANDER	JAMES	
Address Line 1	Address Line 2	City	Zipcode
3639 MILANO CT	APT 6	MIDDLETON	535622177

Registration Information

Birthdate	Reg Date	Status	Status Reason
9/23/1989	10/7/2008	Active	Registered

Mailing Address

Address Line 1	Address Line 2	Address Line 3	City	State	Zipcode

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- [View your Absentee Ballot Status](#)

Below is your polling place location and sample ballot for the following election:

6/5/2012 - 2012 JUNE 5 RECALL ELECTION

Note: Polling Place Locations can change from election to election.

Polling Place Location

Location

WARD 6, 7, 14-18 ST LUKE'S 2012
7307 HUBBARD AVE
MIDDLETON
535623115

Hours

7:00 AM - 8:00 PM

[Polling Place Location Accessibility Details](#)

Sample Ballot

[View sample ballot](#)

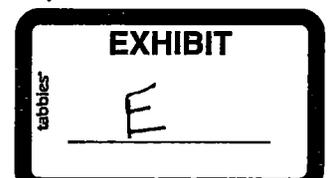


EXHIBIT F

Description of Insufficient Nomination Signatures for Amanda Hall for State Assembly

Page #	Line #	First Name	Last Name	Issue/Description
2	3	n/a	Urbach	No First Name provided. No actual signature.
2	6	Alexander	Brown	Address may be incorrect (see Paragraph 6 of the Complaint)
3	1	Theresa	Balsiger	Same hand writing as page 3, #2
3	2	Ryan	Balsiger	Same hand writing as page 3, #1
5	5	Ron	Wood	Address out of District according to: http://legis.wisconsin.gov/w3asp/waml/waml.aspx
5	8	Andrew	Burch	Signer signed nominations papers for another candidate, Robert Kahl, for the same office prior to this date.
8	3	Harold	Tipler	No 4616 Schofield St. exists per Access Dane
8	6	Appetta		No Last name provided
10	6	Tyler	Byrnes	No 2222 Martin St exists per Access Dane
12	2	Phillip	Sparinger	Respondent Amanda Hall initialed the change, instead of circulator Alexander Brown
12	3	Nancy	Gray	No 2105 Carver St exists per Access Dane; whole page withdrawn per someone other than circulator making corrections to page.
12	4	Jon	Krueger	Whole page withdrawn per someone other than circulator making corrections to page.
12	5	Charles	Hoskee	Whole page withdrawn per someone other than circulator making corrections to page.
12	6	Gerald	Ringlund	No 1909 Carver St exists per Access Dane; whole page withdrawn per someone other than circulator making corrections to page.
12	7	Thomas	Johnke	Town of Fitchbug listed instead of City of Fitchburg; whole page withdrawn per someone other than circulator making corrections to page.
12	8	Michaela	Johnke	Town of Fitchbug listed instead of City of Fitchburg; whole page withdrawn per someone other than circulator making corrections to page.
15	8	Michelle	Martinez	Address out of District according to: http://legis.wisconsin.gov/w3asp/waml/waml.aspx
16	8	Dave	Vetrovec	Date 5/32 is not a real date
18	6	Lindsey	Delarlo	No 1809 Carver St. exists per Access Dane
18	8	Alissa	Andkus	Address change made, no circulator initials next to change
18	8	Alex		Illegible name
19	5	Randy	Boyes	Signature change made, no circulator initials next to change
20	2	Laura	Hermanson	No 6401 Roselawn per Access Dane

21	2	Shirley	Sanders	Date change made, no circulator initials next to change
21	3	Kristina	Alpire	Date change made, no circulator initials next to change
22	7	Eric	Taylor	Address out of District according to: http://legis.wisconsin.gov/w3asp/waml/waml.aspx
23	7			No name printed
27	1	D. Bruce	McConnell	Signer signed nominations papers for another candidate, Robb Kahl, for the same office prior to this date.
27	7	Ramsey	Phibbs	Date of 5/2 listed after date of 5/29
28	2	Robert	Johnston	Lines 2,3 & 4 Crossed out but 6 valid signatures counted
28	3	Dave	Tingor	Lines 2,3 & 4 Crossed out but 6 valid signatures counted
28	4	David	Brale	Lines 2,3 & 4 Crossed out but 6 valid signatures counted
28	8	Carly	Phillips	Date of 5/27 listed after 5/29