

State of Wisconsin
Government Accountability Board

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GOVERNMENT ACCOUNTABILITY BOARD

Assembly Democratic Campaign Committee,
By Joel Gratz,

Complainant,

HAND DELIVERED

Against

Jonathan Dederer,

Respondent.

VERIFIED COMPLAINT

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

1. This Complaint is brought against Jonathan Dederer 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 226 N. Broom Street, Apt. 2, Madison, WI 53703.
4. On or about June 1, 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 78th Assembly District. The Respondent's nomination papers contained approximately 212 valid signatures as determined by initial review of GAB staff.
5. Respondent's nomination papers contained a total of 14 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 198.
6. 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.
8. Complainant reserves the right to amend this complaint with additional information.

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

Exhibit A
Insufficient Signatures

Page #	Line #	First Name	Last Name	Reason for insufficiency
16	6	Scott	Timmons	Out of District. In Assembly Dist # 77, not District #78.
12	2	Amy	Dusele	Out of District. In Assembly Dist # 77, not District #78.
12	3	Jim	Green	Out of District. In Assembly Dist # 77, not District #78.
15	3	Barbara	Curt	Out of District. In Assembly Dist # 77, not District #78.
15	4	Dawn	Stark	Out of District. In Assembly Dist # 77, not District #78.
15	7	Nicolas	Taylor	Out of District. In Assembly Dist # 77, not District #78.
15	8	LaDella	Mather	Out of District. In Assembly Dist # 77, not District #78.
13	8	Clark	Bingleck	Out of District. In Assembly Dist # 77, not District #78.
13	9	Tara	Gutherie	Out of District. In Assembly Dist # 77, not District #78.
2	3	Jim	(Illegible)	Out of District. In Assembly Dist # 76, not District #78.
7	6	(Illegible)	Dalie	Out of District. In Assembly Dist # 77, not District #78.
7	7	(Illegible)	(Illegible)	Out of District. In Assembly Dist # 77, not District #78.
14	9	(Illegible)	(Illegible)	Address illegible. Unable to determine district.
21	9	Rossalie	Migas	Address unable to locate. Not in district.