

STATE OF WISCONSIN WISCONSIN ELECTION COMMISSION

DOUGLAS HYANT, Political Director, Assembly Democratic Campaign Committee,

Complainant,

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MARIA VILLAREAL,

VERIFIED COMPLAINT

- I, Douglas Hyant, upon information, personal knowledge, and belief, hereby allege and swear as follows:
- 1. This Complaint is brought against Maria Villareal pursuant to Wis. Admn. Code EL § 2.07, Wis. Stat. § 8.15(2), Wis. Stat. § 8.15(3), and Wis. Stat. § 8.15(4)(a).
- 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, with offices located at 15 North Pinckney Street, Suite 200 in the City of Madison, Wisconsin, Zip Code 53703.
- 3. The Respondent, Maria Villareal, Wisconsin Elections Commission File Number 0106082, Receipt Number 302, maintains a residential address at 1001 South 3rd Street, in the City of Milwaukee, Wisconsin, Zip Code 53204.
- 4. On or about June 1, 2018, Respondent filed nomination papers with the Wisconsin Elections Commission to be placed on the November 6, 2018 ballot for State Representative in

the 8th Assembly District. The Respondent's nomination papers contained approximately 217 signatures as determined by initial review of the Wisconsin Elections Commission staff.

- 5. Upon a more detailed examination, Respondent's nomination papers contain numerous deficiencies, including but not limited to signers who live outside of the district, signers who failed to indicate their date of signing, and/or signers who did not provide their address and municipality information in the certification.
- 6. Respondent's nomination papers contained a total of fifty-five (55) signatures with insufficiencies pursuant to Wis. Admn. Code EL §§ 2.05 and 2.07, bringing the total number of valid signatures substantially below the 200 signature threshold required to be placed on the ballot for State Assembly.

I. ELECTORS RESIDING OUTSIDE OF THE DISTRICT

- 7. For nomination signatures to be valid pursuant to Wis. Stat. §§ 8.15(2) and (3), a signer of the nomination papers for a state office, including that of Representative in the Wisconsin State Assembly, must reside in the jurisdiction or district which the candidate names on the paper will represent if elected. Wis. Stat. §§ 8.15(2) and (3) (2015-16).
- 8. A copy of the insufficient signatures is attached hereto and incorporated herein as "Exhibit A". These signatures listed in Exhibit A are from outside the 8th Assembly District, failed to include essential address information, or failed to provide an address entirely. The proper Assembly District of each signer is provided where it is able to be determined and incorporated herein as "Exhibit B," which is comprised of screenshots taken directly from the "Who Represents Me?" search engine.

- 9. Electors who reside outside of the Respondent's district but signed the Respondent's nomination papers were found on the following pages: Page 4-1, 6; Page 9-1, 2, 3, 4, 5, 6, 7, 9, 10; Page 10-1, 2, 5, 6, 8, 9; Page 11-3, 7, 9, 10; Page 12-1, 2, 7; Page 16-3; Page 20-3, 4, 5, 6, 7; Page 21-1, 5, 6; Page 23-2, 4, 5; Page 24-1, 2, 3, 4, 6, 7; Page 25-8; Page 27-2, 4; Page 28-3; Page 29-1, 2, 4; Page 30-2; and Page 31-5. (51 signatures eliminated).
- 10. District residency or non-residency was determined utilizing the "Who Represents Me?" search engine available via the Wisconsin Legislature's website and accessible to the public at the following internet address: http://legis.wisconsin.gov/pages/waml.aspx, per the direction of the Wisconsin Elections Commission. See Wisc. Elections Comm'n, Nomination Paper Challenges (Jan. 2018) at 6-7.
- 11. Where addresses from Respondent's nomination papers were not found in the "Who Represents Me?" search engine, the issue with the provided address information is given in Exhibit A.
- 12. A copy of the address search for the insufficient signatures is attached hereto and incorporated herein as Exhibit B. These screenshots come directly from the "Who Represents Me?" search engine.

II. THE ELECTOR'S SIGNATURE AND PRINTED NAME DO NOT MATCH

13. For nomination signatures to be valid pursuant to Wis. Stat. § 8.15(2), an elector signing the nomination papers for a state office, including that of Representative in the Wisconsin State Assembly, must provide their legal name and signature. Wis. Stat. § 8.15(2) (2015-16).

- 14. Page 9, line 9 of Respondent's nomination papers show completely different names in the "signature" and "printed name" potions of the nomination paper for an individual Elector. Even more concerning, the signature reads "Eunice Jaszezewski", but the printed name is that of the candidate, "Maria Villareal." This is a clear violation of Wis. Stat. § 8.15(2).
- 15. Copies of the Respondent's nomination paper exhibiting this defect is attached hereto and incorporated herein as "Exhibit C". Signatures exhibiting this defect are as follows: Page 9-9 (1 additional signature eliminated from Respondent's nomination papers).

V. ELECTOR DID NOT PROVIDE REQUIRED ADDRESS AND MUNICIPALITY OF RESIDENCE

- 16. For nomination signatures to be valid pursuant to Wis. Stat. § 8.15(2), an elector signing the nomination papers for a state office, including that of Representative in the Wisconsin State Assembly, must provide their address and municipality of residence for voting purposes. Wis. Stat. § 8.15(2) (2015-16).
- 17. Pages 6 and 17 of Respondent's nomination papers fail to correctly identify the address and/or municipality of residence of the Elector. This is a clear violation of Wis. Stat. § 8.15(2).
- 18. Copies of the Respondent's nomination papers exhibiting this defect and a screenshot of the "Who Represents Me?" map demonstrating an invalid or non-existent address are attached hereto and incorporated herein as "Exhibit D". Signatures exhibiting this defect are as follows: Page 6-9; Page 17-8 (2 additional signatures eliminated from Respondent's nomination papers).

VI. SIGNATURES WERE INVALID BECAUSE A DATE OF SIGNING WAS NOT INCLUDED

- 19. For nomination signatures to be valid pursuant to Wis. Stat. § 8.15(2), an elector signing the nomination papers for a state office, including that of Representative in the Wisconsin State Assembly, must provide the date the elector signed the nomination papers. Wis. Stat. § 8.15(2) (2015-16).
- 20. Page 17 of Respondent's nomination papers include signatures where the elector failed to include the date of signature. Copies of the Respondent's nomination papers exhibiting this defect are attached hereto and incorporated herein as "Exhibit H". Signatures exhibiting this defect are as follows: Page 17-8 (1 additional signature eliminated from Respondent's nomination papers).
- 21. Respondent's nomination papers contained a total of 55 signatures with insufficiencies pursuant to Wis. Admn. Code EL §§ 2.05-2.07 and Wis. Stat. § 8.15, et. seq., bringing the total number of valid signatures below the threshold of 200 signatures necessary to be placed on the ballot for State Assembly. The contested signatures are contained in the above-referenced exhibits, accompanied by a detailed explanation of their insufficiency.
- 22. Complainant respectfully submits that the foregoing facts warrant the Commission's attention, and the Commission should take prompt action to eliminate from the nomination papers filed by Respondent all pages that are insufficient or do not comply with Wis. Admn. Code EL §§ 2.05 2.07.
- 23. Complainant reserves the right to amend this complaint with additional information.

SIGNATURE AND CERTIFICATION

I, Douglas Hyant, being duly sworn under o	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 paper	
allegations stated upon my information and belief,	I believe them to be true.
Dated this 44 day of June, 2018.	1
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	Douglas Hyant
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County of	
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(Signature of circulator)

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(Circulator's residential address - Include number, street, and municipality)

CERTIFICATION OF CIRCULATOR

certify: I reside at 🖊

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irculated this nomination paper and personally obtained each of the signatures on this paper. They signers are electors of the jurisdiction or district the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the days indicated dayosite his or her name. I know their respective residences given. I intend to support this candidate. I am sware that falsifying this certification is punishable under Wis. Stat. § 12.137 (a). (Signature of circulator) (Date)

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the undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as tatement of principle indicated above. I am eligible to vote in the andidate named above seeks office. I have not signed the nomination paper of any other candidate for the same office at this election.	sse name and residential address are listed above, ers will have the opportunity to vote for □ him or, ned the nomination paper of any other candidate	be placed on the ballot at the election described above as a candidate representing the party o Byher for the office listed above. I am eligible to vote in the jurisdiction or district in which the for the same office at this election.	i described above a eligible to vote in t	s a candidate representing the party he jurisdiction or district in which th	ng the party or t in which the
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(Name of circulator)		(Circulator's residential address - Include nu	mber, street, and municipality)	
further certify I am either a qualified elector of W	risconsin, or a U.S. citizen, age 18 or older who, if or stained each of the signatures on this paper. Tkn	were a resident of this state, would not be disqu ow that the signers are electors of the jurisdiction	further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of the jurisdiction or district the candidate seeks to represent I know included this nomination baser and personally obtained each of the signatures on this page. I know the process of the signatures on this page.	<u>≻</u> ·
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that each persopagned the paper with full knowledge of its content on the date indicat aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a).

(Signature of circulator)

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EL JARR I BAU 2016.03 | Web: Biections Commission, P.O. Box 7984, Madison, WI 53707-7984 | 608-266-8005 | Web: Biections Wi, gov | Bmail: elections @wi.gov (Date)

andidate's name (required); no titles may be used.	Candle Street,	Candidate's residential address (required) <i>No P.O. box addresses</i> Street, fire, or rural route number; box number (if rural route); an	Candidate's residential address (required) No P.O. box addresses Street, fire, or rural route number; box number (if rural route); and name of street or road		Candidate's municipality for voting purposes (required). Town of Mr. M. M. P. O. Village of Mr. M. D. M. P. D.	Mily for voting purposes	(required).
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urther certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I perso culated this nomination paper and personally obtained each of the signatures on this paper. I know that the signet of the jurisdiction or district the candidate seeks to represent. I know the paper with full knowledge of its content on the date indicated opposite his order name. I know their respective residences given. I intend to support this candidate. I am vare that falsifying this pertification is punishable under Wis. Stat. § 12.83(3)(a).

(Signature of circulator)

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ig of office (required)	l Dis	District or Jurisdiction (required if applicable)		Name of Jurisdiction	Name of Jurisdiction or district in which candidate seeks office (required)	s office (required)
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is undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as a candidate representing the party or a undersigned, request that the jurisdiction or district in which the principle indicated above, so that voters will have the opportunity to vote for the normal above. I am eligible to vote in the jurisdiction or district in which the place of the normal above of the normal above.	ose name and residential additers will have the opportunity	dress are listed above, I to vote for II him or I of any other candidate f	op placed on the ballot at the (If her for the office listed abov Or the same office at this elec	election described a re. I am eligible to v tion.	sbove as a candidate represe ote in the jurisdiction or dist	nting the party or rict in which the
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culator)	of Wicroncin or a 11 S citizen age 18 or		(Circulator's residential address - Include number/street, and municipality) older who if I were a resident of this state. Would not be disqualified from voting under Wis. Stat. \$ 6.03. I personally	al address - Include num	Circulator's residential address - Include number, street, and municipality) it of this state, would not be disqualified from voting under Wis.	Stat. § 6.03. I personally

rther certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older wno, it I were a resident or unis state, would not be unsultant to a u.S. citizen, age 18 or older wno, it I were a resident or unistant to a district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know their respective residences given. I intend to support this candidate. I am are that falsiving this certification is punishable under Wis. Stat. § 12.13(31(a). (Signature of circulator)

(Date)

Candidate's name franchised in a libra may be used			27 5
Campage 3 name (required), no titles may be used.	Street, fire, or rural route numb	Street, fire, or rural route number; box number (if rural route); and name of street or road	Candidate's municipality for voting <u>purpases</u> (required). Town of M.
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, the undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as a candidate representing the party statement of principle indicated above, so that voters will have the opportunity to vote for D him or B her for the office listed above. I am eligible to vote in the jurisdiction or district in which the same office at this election.	me and residential address are listed above, Il have the opportunity to vote for □ him or i he nomination paper of any other candidate	be placed on the ballot at the election described Be her for the office listed above. I am eligible to for the same office at this election.	above as a candidate representing the party or vote in the Jurisdiction or district in which the
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cuated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent, at each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I knowledge of its content to the date indicated opposite his or her name. I knowledge of its content to support this candidate.	l each of the signatures on this paper. I know its content on the date indicated opposite in. Wis. Stat. § 12.13(3)(a).	that the signers are electors of the jurisdiction o s or her name. I know their respective residence	r district the candidate seeks to represent. I know s given. I intend to support this candidate. I am

(Signaturé-of-circulator) (Date)

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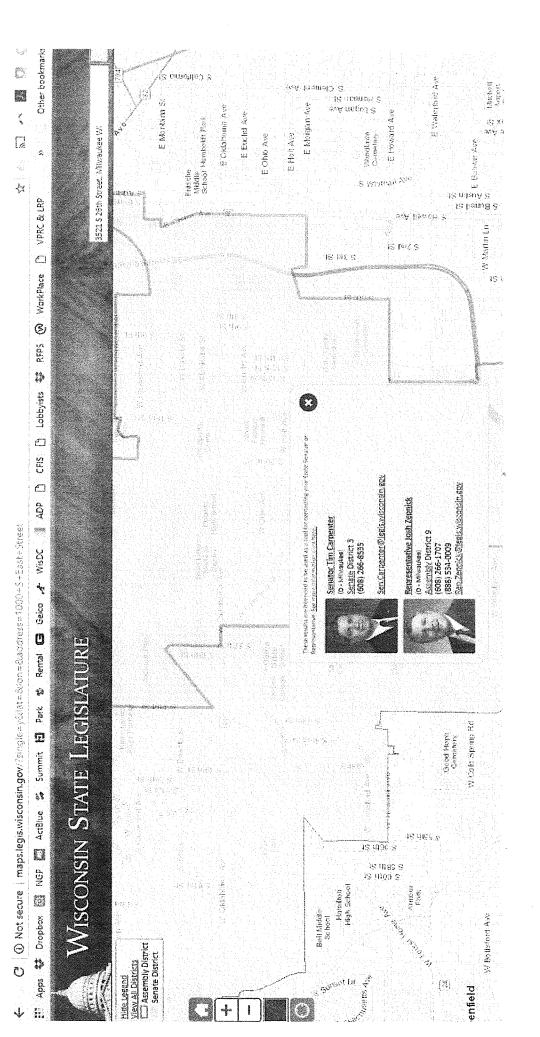
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(Name of circulator) (Name of circulator) (Name of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the candidate are not the signer of the signer or the signer o	Visconsin, or a U.S. citizen btained each of the signal	, age 18 or older who, if I version this paper. I know	were a resident of this state, would	I not be disqual	ified from voting under Wis. Stated from voting under States for district the candidate seeks to	at. § 6.03. I personally prepared in the second in the sec
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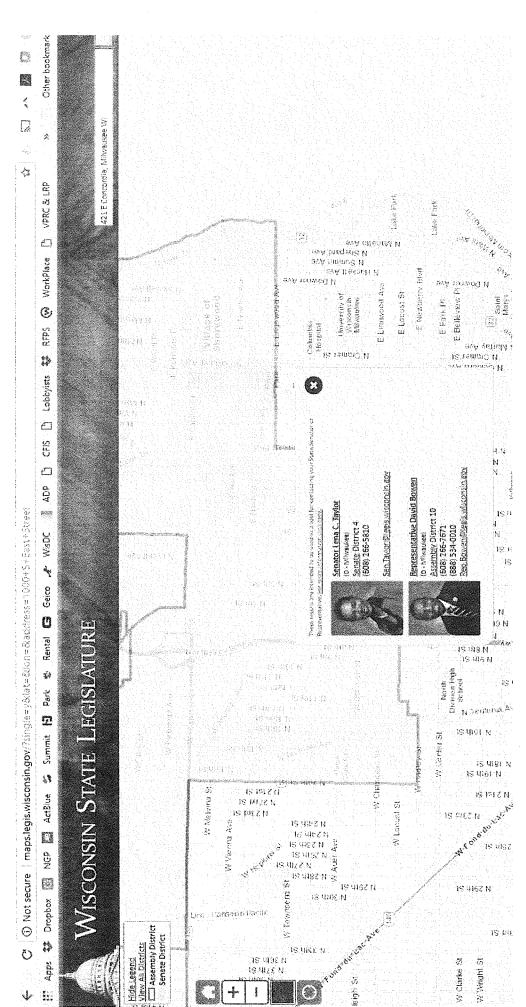
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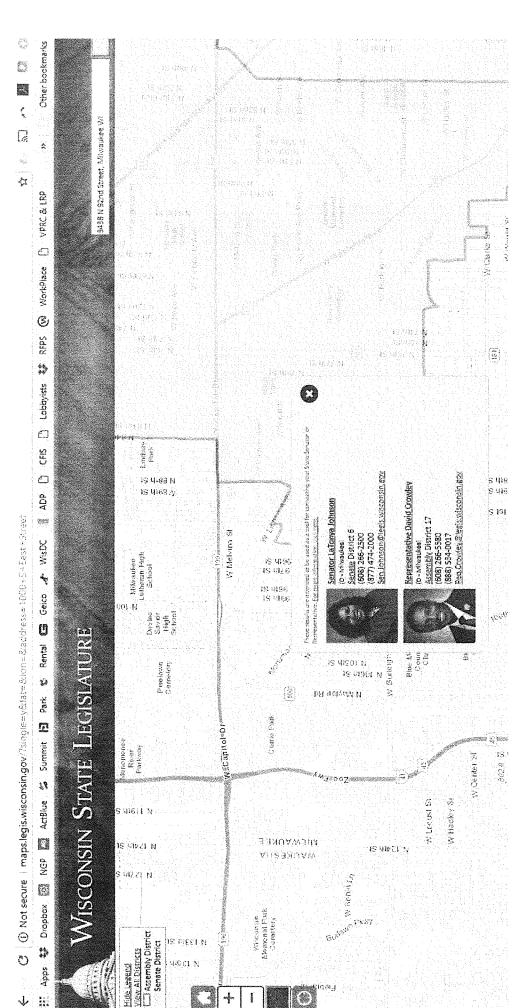
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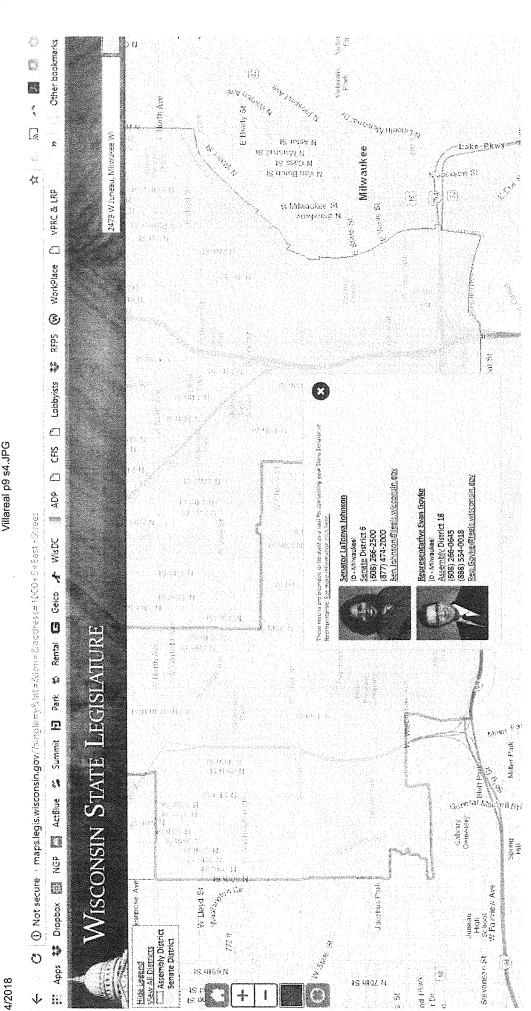
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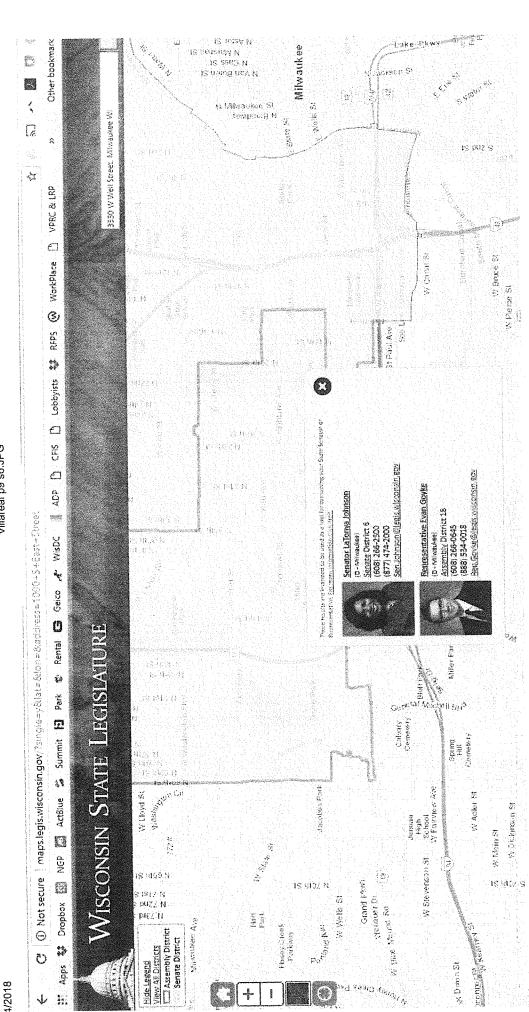


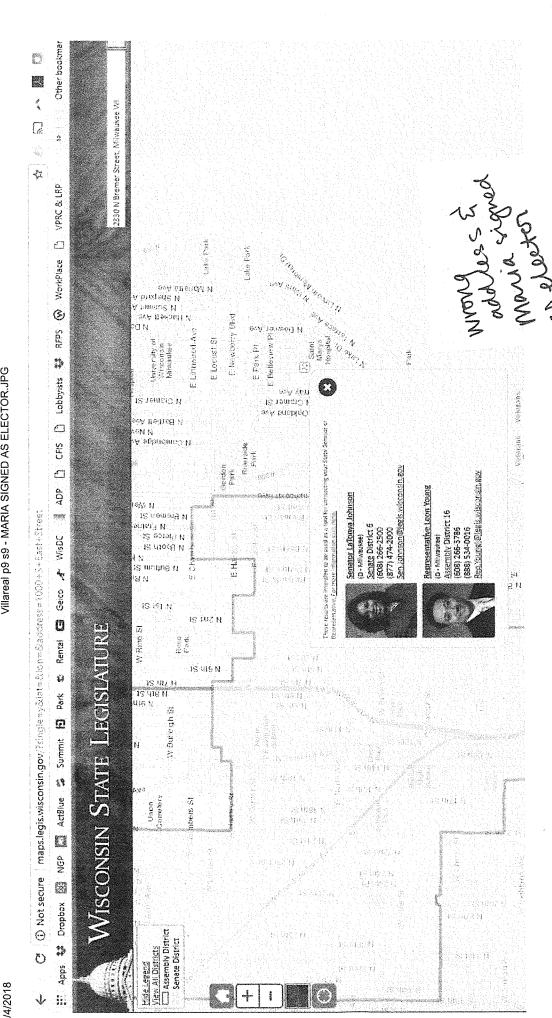
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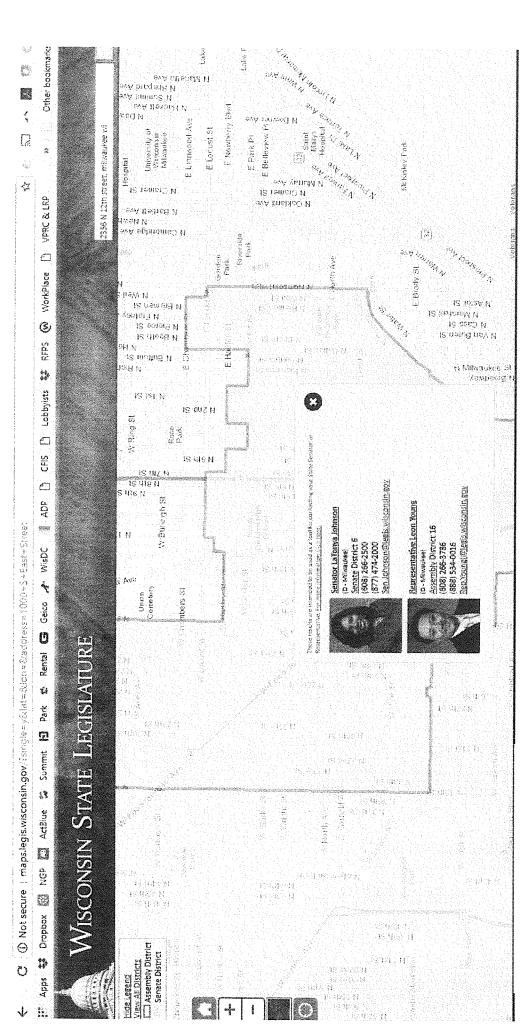


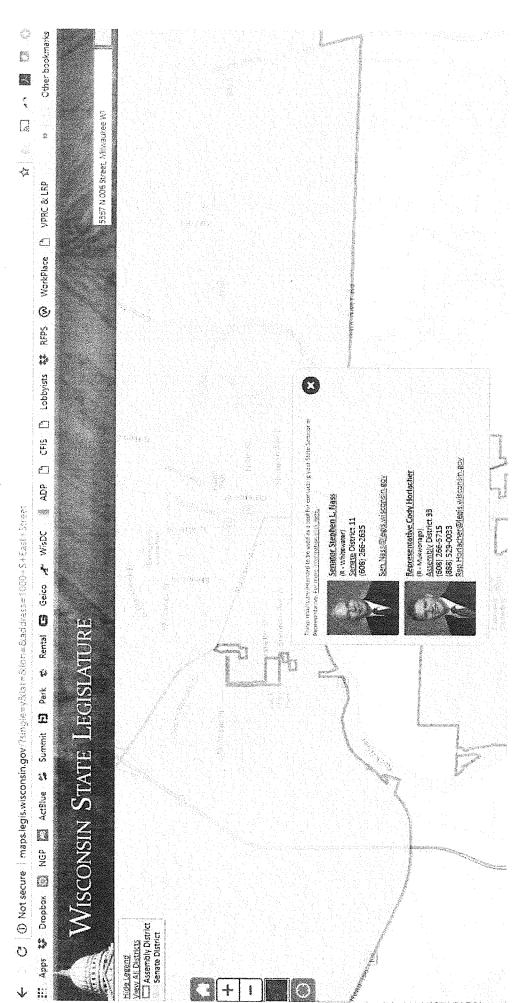
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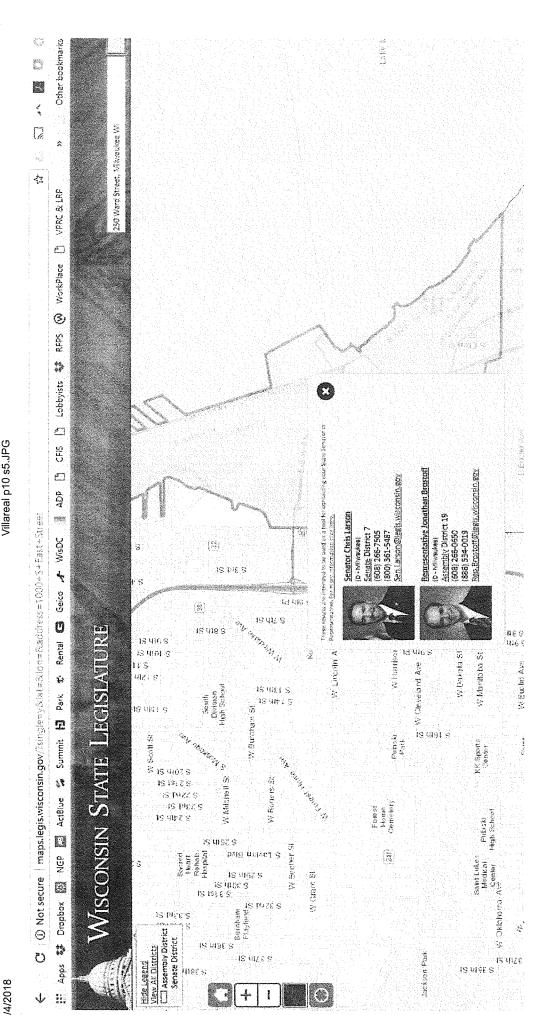


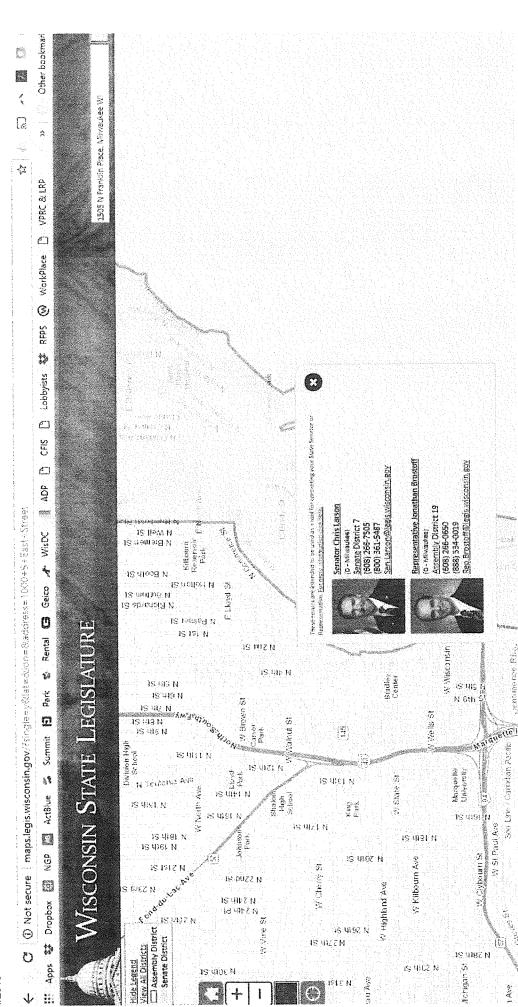


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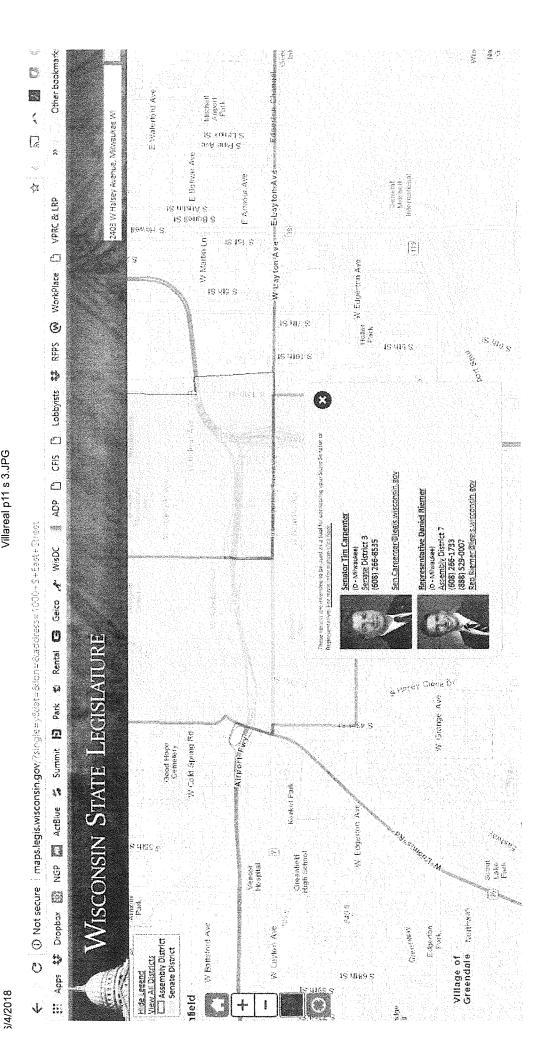


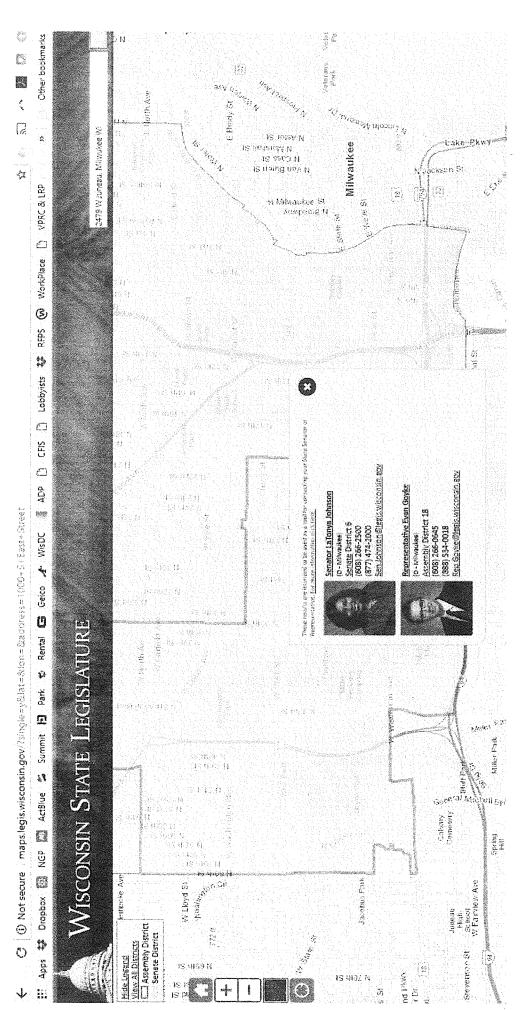




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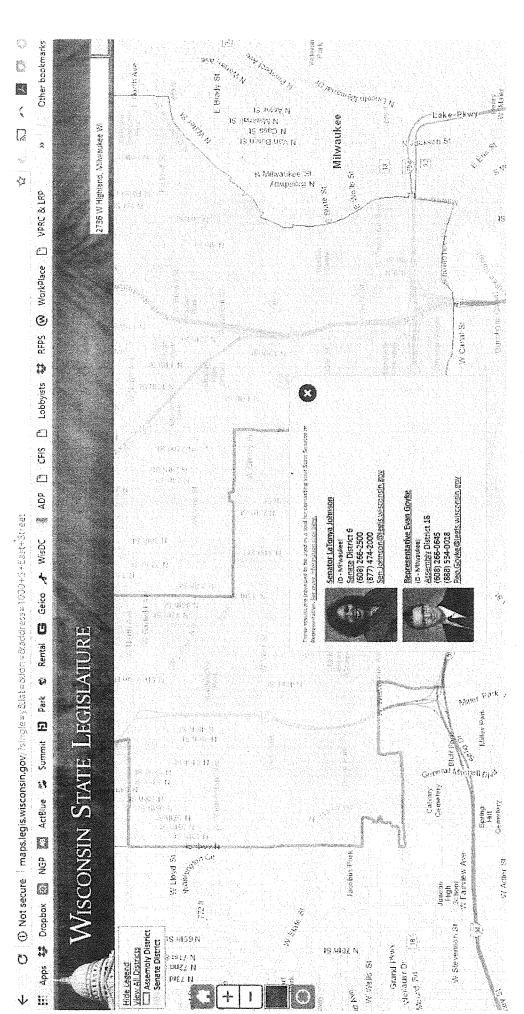
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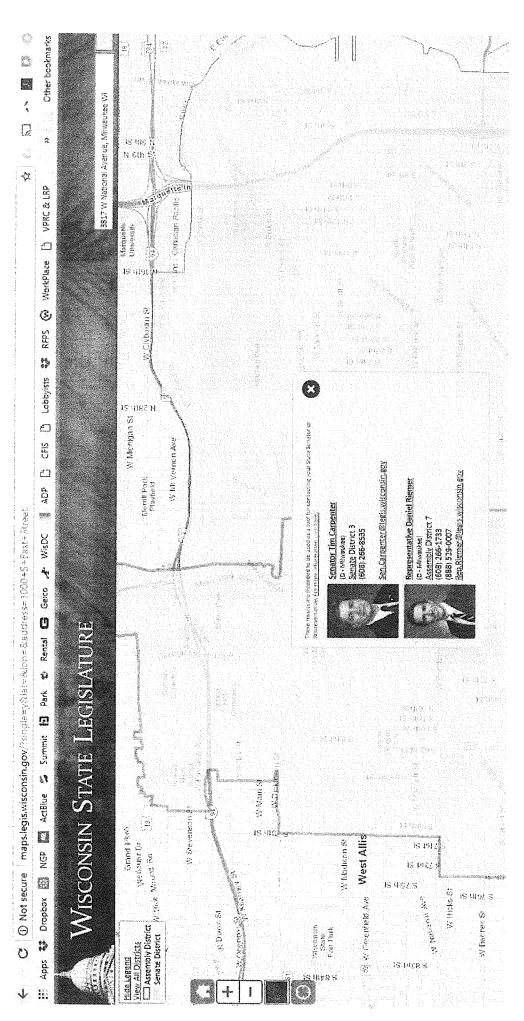


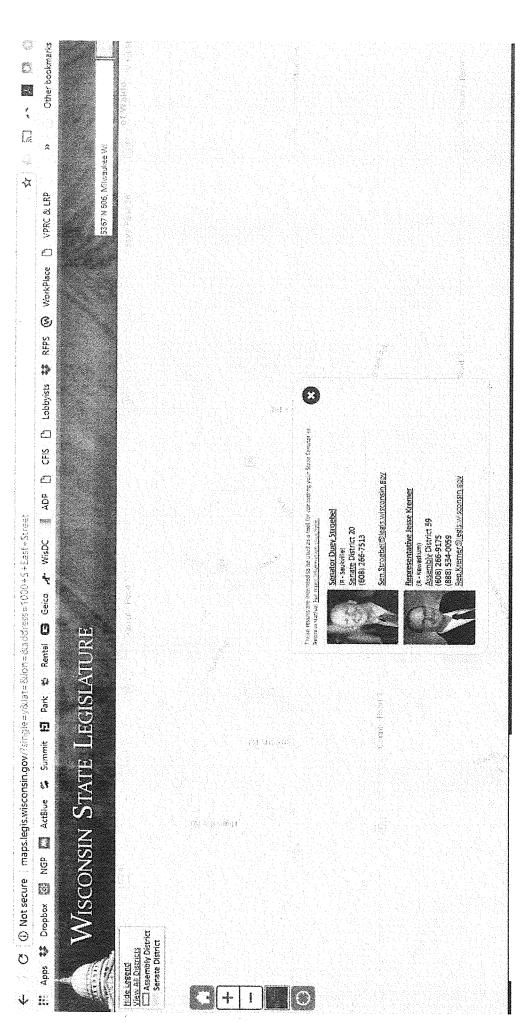


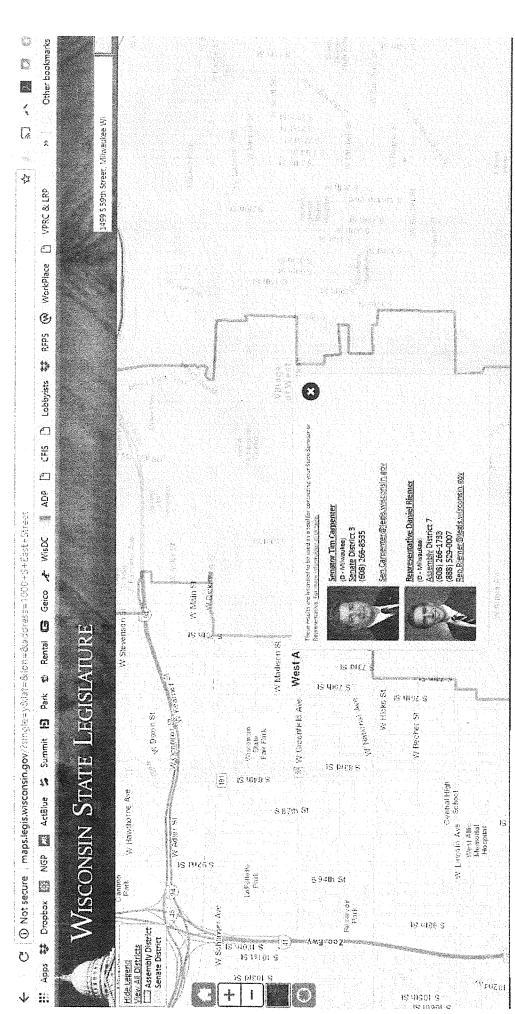
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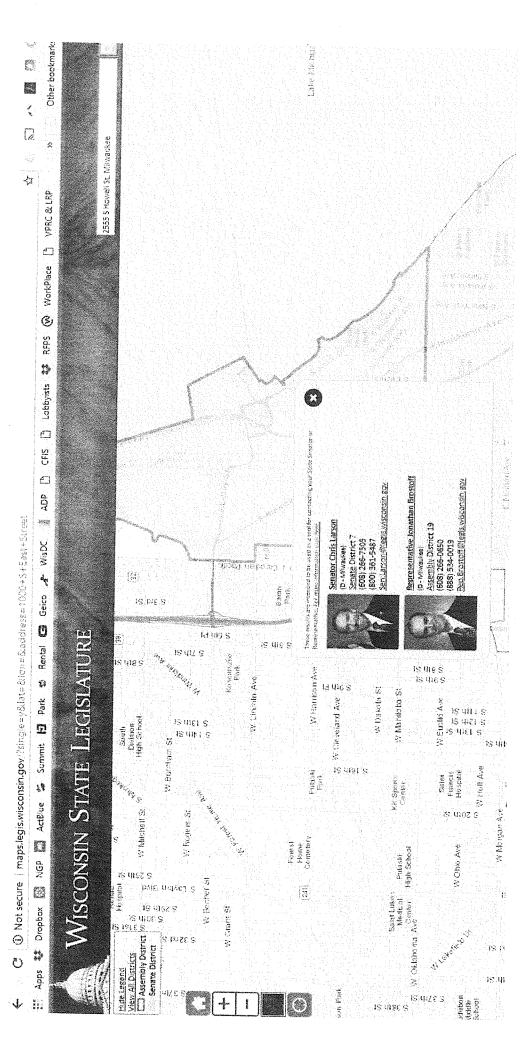
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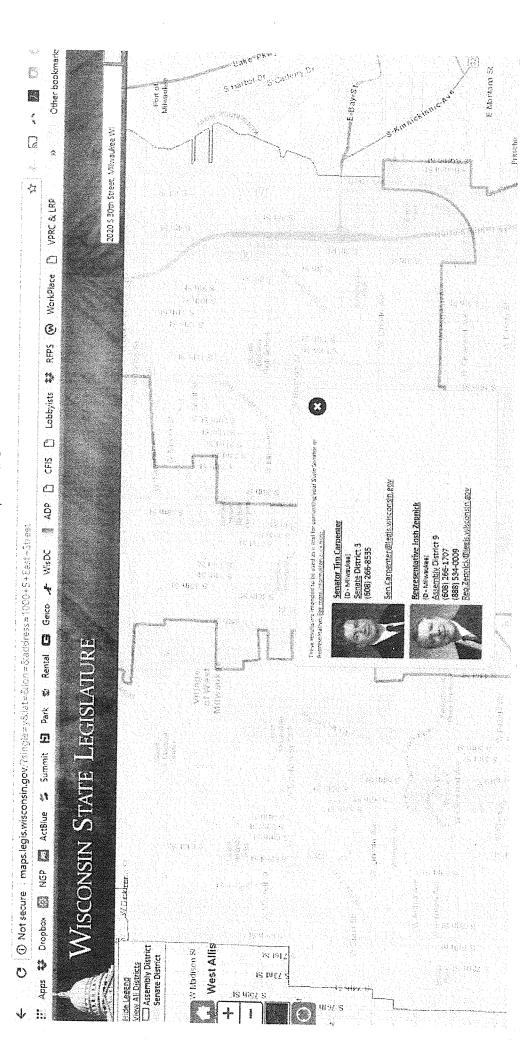


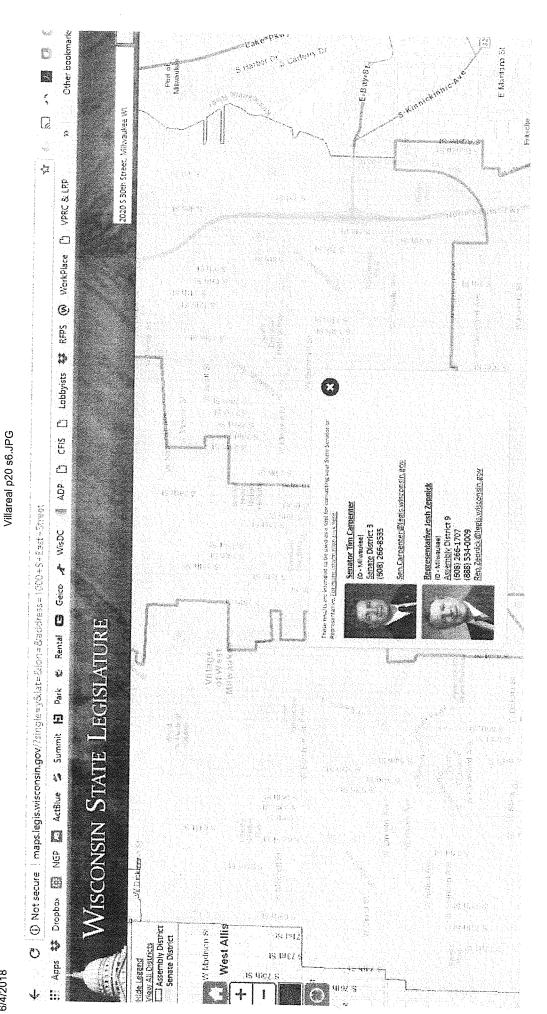


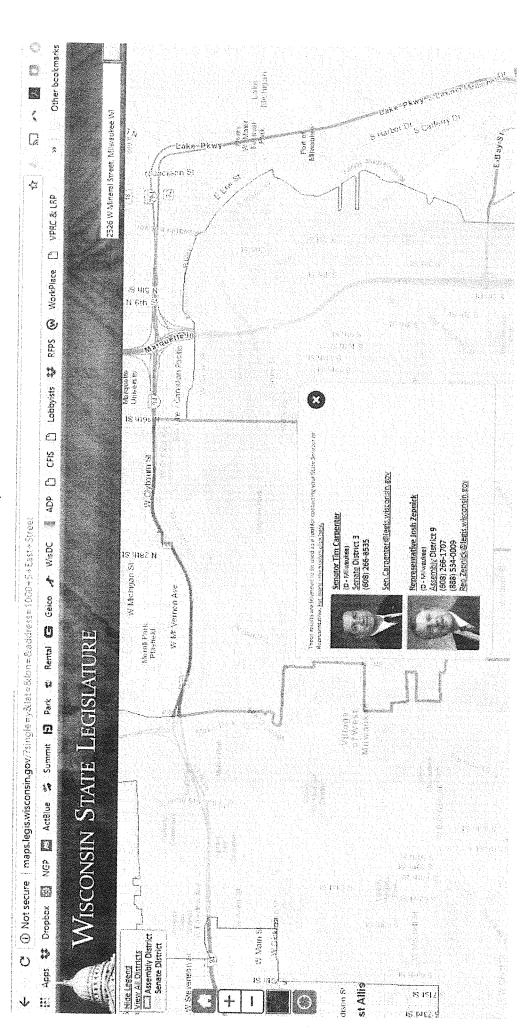


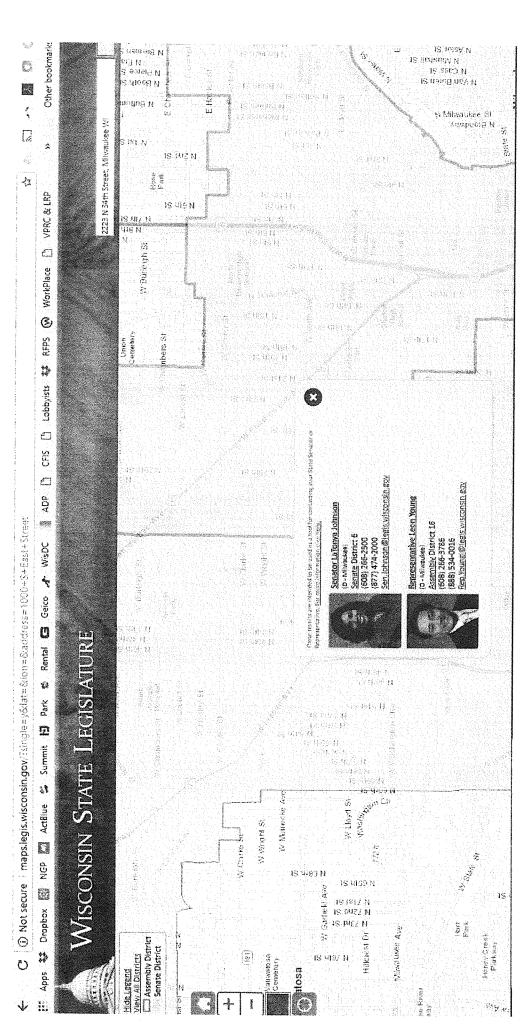


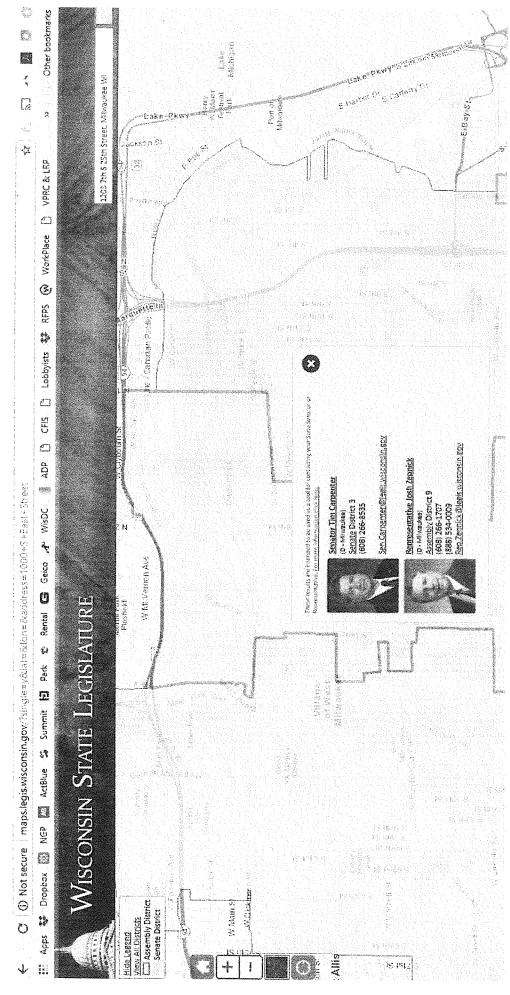


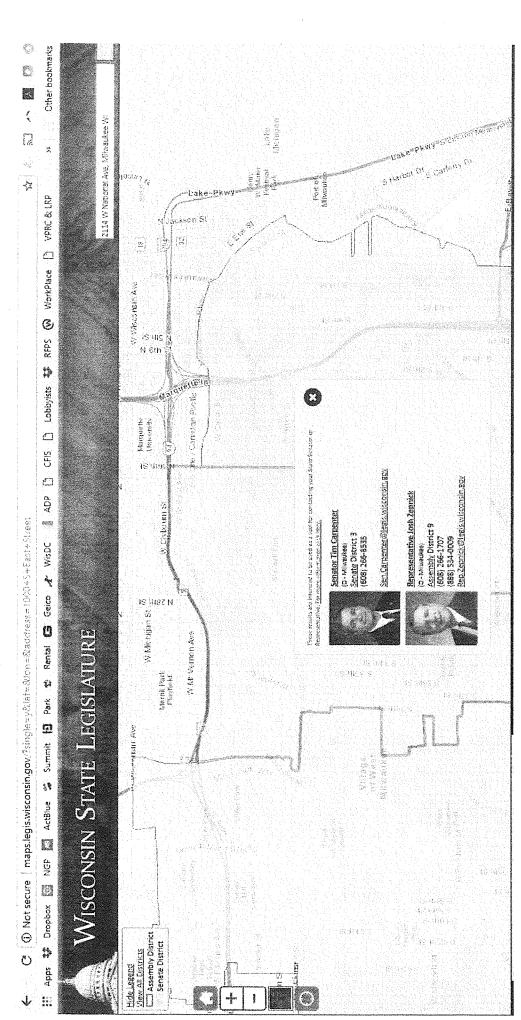


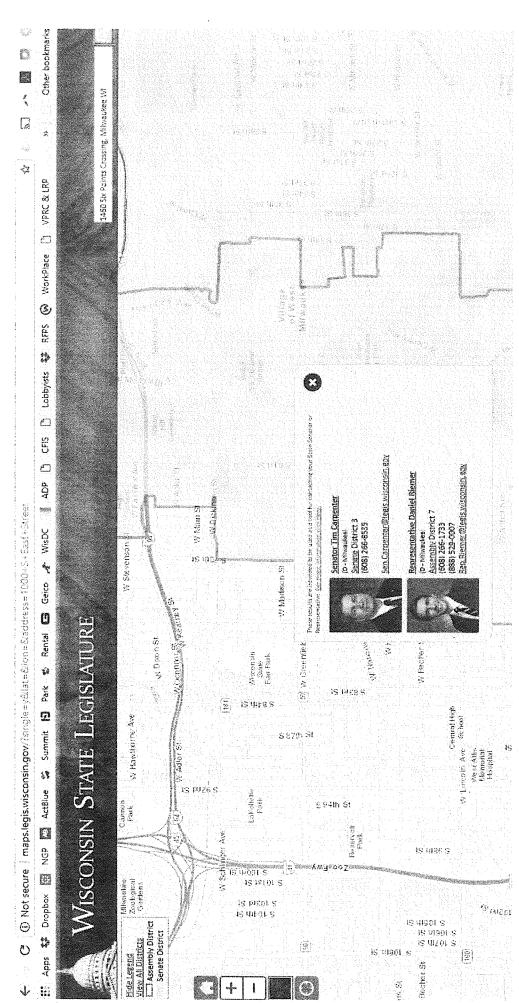


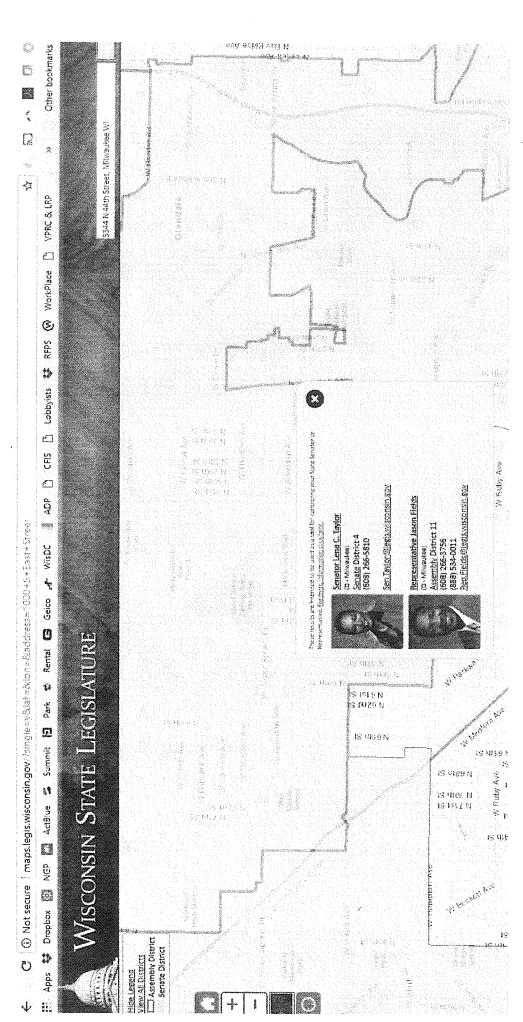


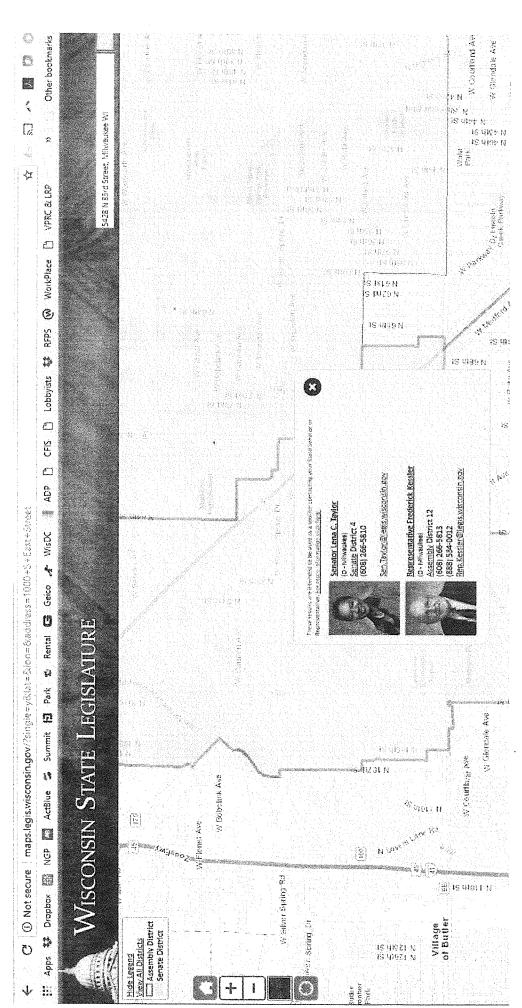


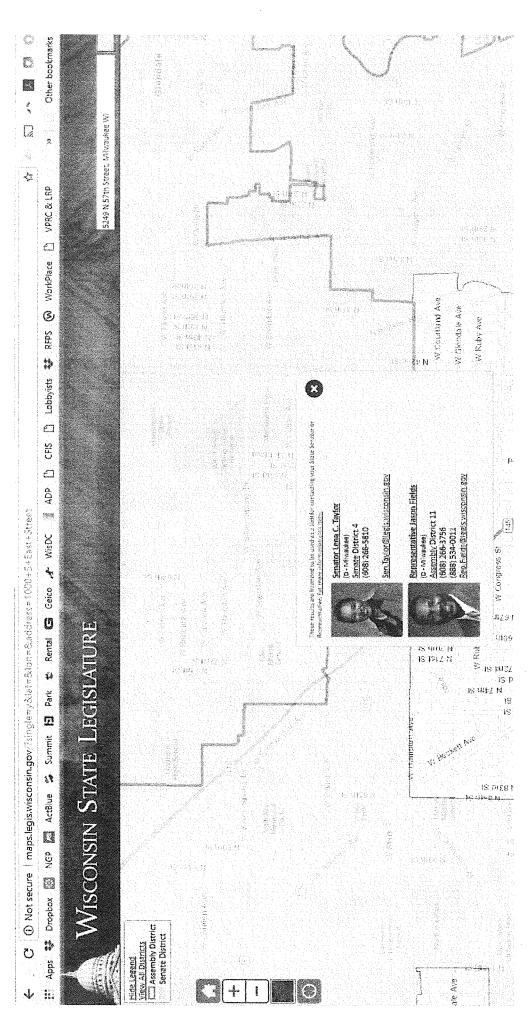


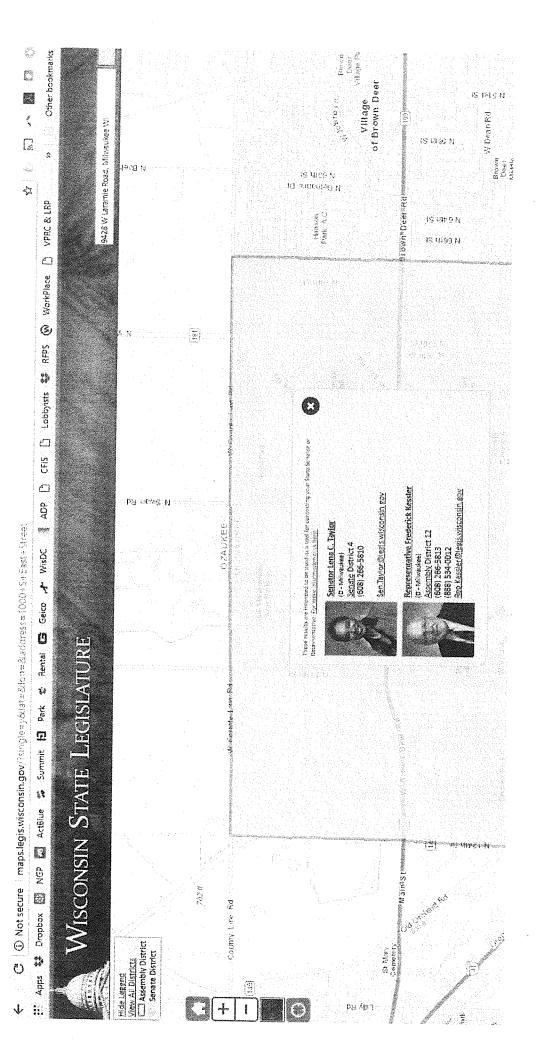


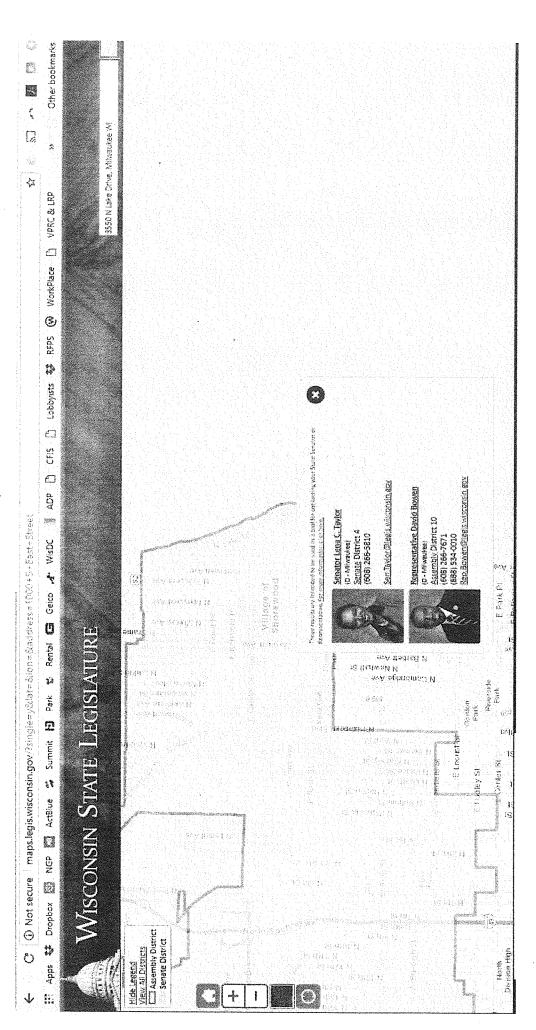


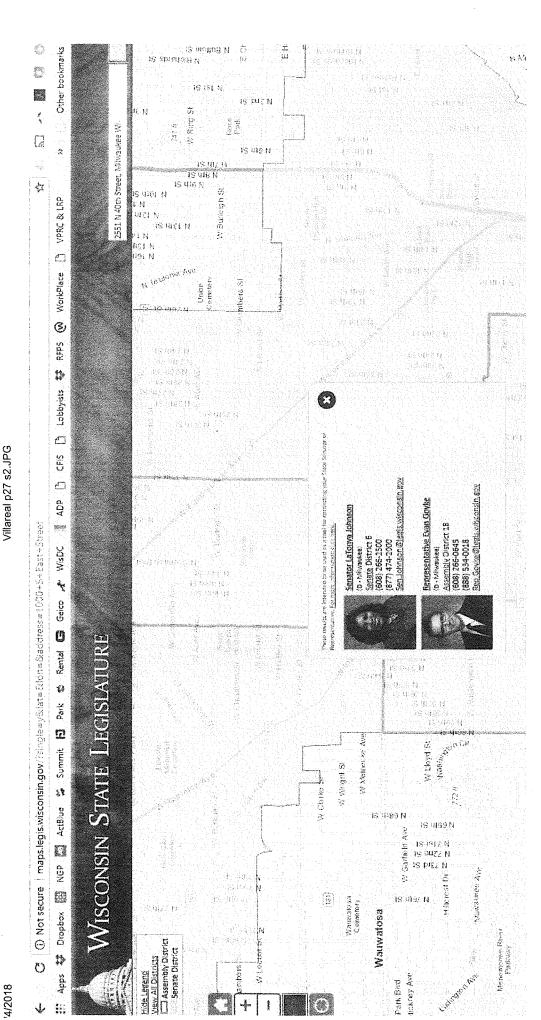


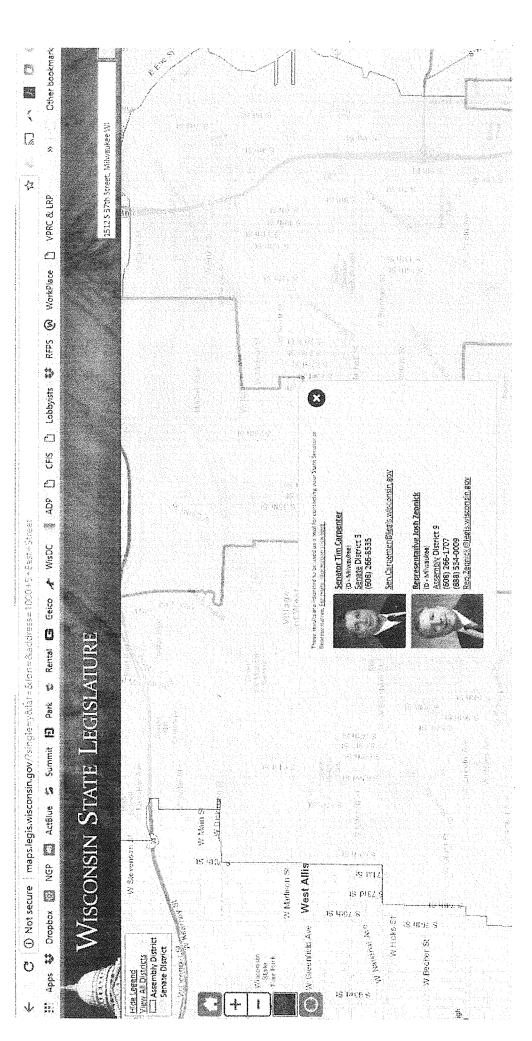


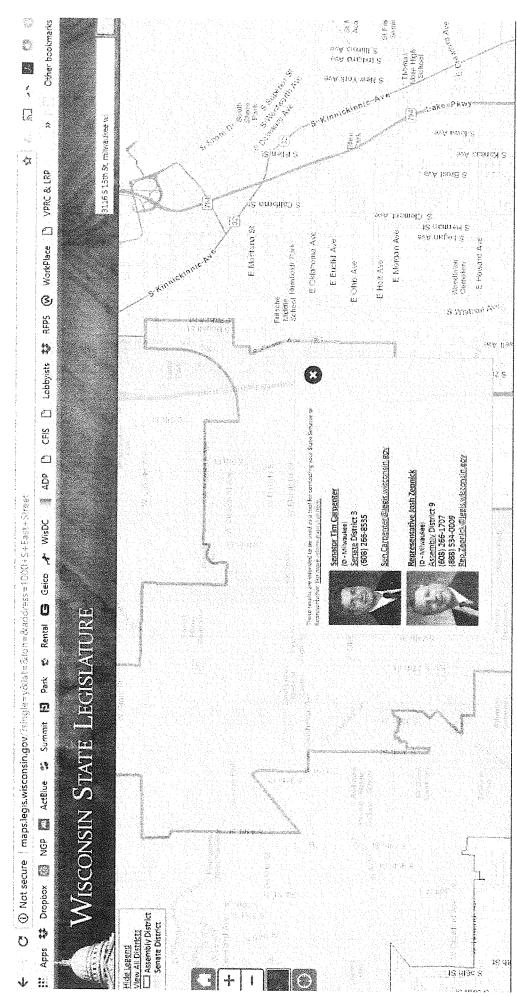












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