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**STATE OF WISCONSIN**  
**Before the Government Accountability Board**

The Certified Complaint of

THE YOUNG REPUBLICANS OF DANE COUNTY  
CHARLA HALVERSON, Complainant

**VERIFIED  
COMPLAINT**

Against,

TAMMY BALDWIN, Respondent

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This complaint is made under Chapters 5 and 8 of the Wisconsin Statutes and Chapter GAB 2 of the State of Wisconsin Administrative Code, and requests that the Government Accountability Board review the sufficiency of the nomination papers for the Respondent in light of the allegations contained herein.

I, Charla Halverson, allege that:

1. I am a resident of the State of Wisconsin and am a qualified elector. I reside at 29 Morningdale Circle, Madison, WI 53717
2. Tammy Baldwin, who listed her address, as filed with the State Elections Board, as 119 Martin Luther King Jr. Blvd, Lower Level 4, Madison, WI 53703 has filed nomination papers with the Government Accountability Board for certification as Democrat candidate for the U.S. House of Representatives in the Second Congressional District on the November 2, 2010 ballot.

**I**

**CHALLENGE TO RESPONDENTS NOMINATION PAPERS IN THEIR ENTIRETY**

**Nomination Papers Missing Required Information**

3. Respondent filed her nomination papers with the Government Accountability Board on July 7, 2010. See Exhibit A.
4. GAB 2.05(1)states, "Each candidate for public office has the responsibility to assure that his or her nomination papers are prepared, circulated, signed, and filed in compliance with statutory and other legal requirements."
5. Respondent's nomination papers do not include, nor do they substantially include, the Respondent's name of municipality and address of residence for voting purposes, not a separate mailing or office address.

6. Respondent's nomination papers are misleading and not in substantial compliance with the rules promulgated by the Government Accountability Board. Complainant alleges, therefore that Respondent's nomination papers are invalid and that Respondent is ineligible to be placed on the ballot.

WHEREFORE, Complainant prays that the Government Accountability Board review the sufficiency of Respondent's nomination papers and declare them to be invalid in whole or in part; and render such other relief that the Government Accountability Board may deem just and equitable.

Dated this 16 day of July, 2010 at Madison, Wisconsin.

Charla Halverson

Charla Halverson

PRESIDENT, YOUNG REPUBLICANS OF DANE COUNTY

