

The Complaint of

REPUBLICAN PARTY OF WISCONSIN
ALESHA GUENTHER

Complainant,

Against

JOHN BAKER,

Respondent.

VERIFIED
COMPLAINT

Republican Party of Wisconsin, by and through its representative, ALESHA GUENTHER (“Complainant”), brings this complaint against John Baker (“Baker”) and alleges as follows:

1. Complainant Alesha Guenther is a qualified elector of the State of Wisconsin and is an employee of the Republican Party of Wisconsin with a mailing address of 148 East Johnson Street, Madison, WI 53703.
2. John Baker is a declared candidate for Congress in Wisconsin’s First Congressional District with a mailing address of 1523 Fox River Run, Mukwonago, WI 53149.
3. That on June 1, 2020, Baker submitted nomination papers to the Wisconsin Elections Commission in order to secure a place on the ballot in the upcoming election for Representative in Congress.
4. That Wis. Stat. §8.15(6)(b) requires candidates for representatives in congress submit not less than 1,000 valid signatures in order to be nominated for placement on the ballot.
5. The WEC made an initial ruling that the total number of signatures submitted by Baker amounted to only 1,007 signatures.

COUNT 1: Noncompliance with Wis. Stat. §8.15(3)

6. All preceding paragraphs are re-alleged and incorporated as if fully stated herein.
7. Wis. Stat. §8.15(3) states “All signers on each separate nomination paper for all state offices, county offices, and the offices of U.S. senator and representative in congress shall reside in the jurisdiction or district which the candidate named on the paper will represent, if elected.”
8. Upon information and belief, the following nomination signatures are invalid because the signer of the nomination paper does not reside in Wisconsin’s First Congressional District as required by Wis. Stat. §8.15(3): See Attachment A. In total, these pages contain 31 signatures.

The above-referenced activity is sufficient to establish probable cause that Baker’s nomination papers contain 31 signatures which are noncompliant with Wis. Stat. §8.15. Given the number of valid signatures collected and submitted by Baker, these challenges would bring his total valid signature count below the required 1,000 for ballot access.

WHEREFORE, Complainant prays that the Elections Commission review and invalidate all above referenced nomination signatures for John Baker and reject his placement on the ballot.

Dated this 4th day of June 2020, at Madison, Wisconsin.

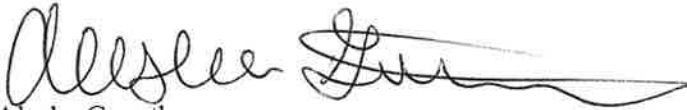


Alesha Guenther

REPUBLICAN PARTY OF WISCONSIN


CERTIFICATION

I, Alesha Guenther, being first duly sworn upon oath, state that I personally read the above complaint and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.


Alesha Guenther

State of Wisconsin)
) ss
County of Dane)

Sworn to before me this 4th day of June, 2020.


Notary Public or Person Authorized
to Administer Oaths




My commission expires 5-2-2023
Or, is permanent.

Attachment A.

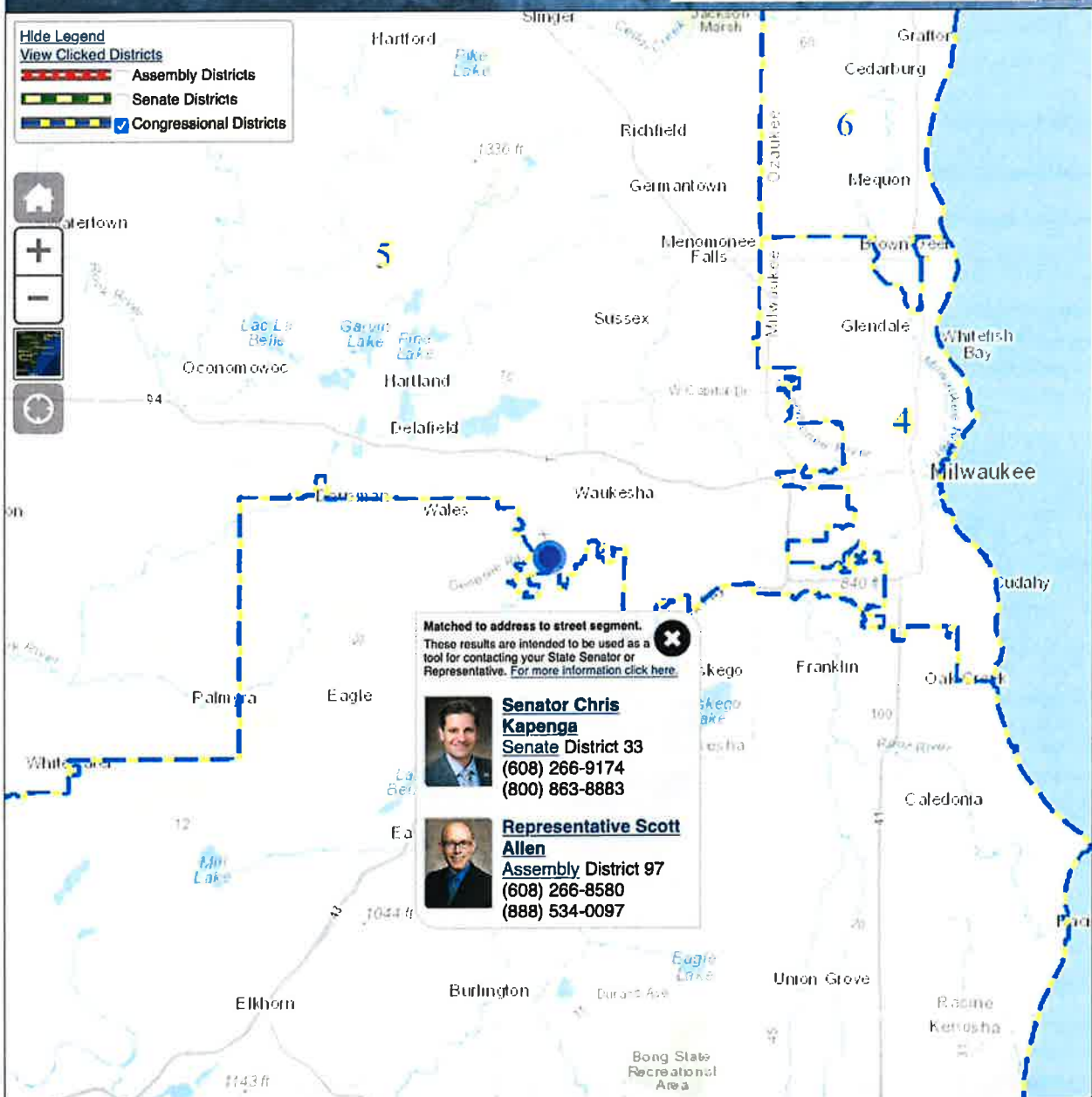
PDF Page	Page No. Listed	Elector line	Name	Address	Zip	Municipality	Date
5	10	5	Jacob Hintz	1191 Burr Oak Blvd Unit D	5318	9 Waukesha	5/18/2020
12	5	2	Shawn Masters	2819 Sussex Ln	5318	8 Waukesha	4/17/2020
14	3	2	Heather Cotton	1608 N Grandview Blvd	5318	8 Waukesha	4/17/2020
14	3	3	Chuck Hughes	2501 Summit Ave #110	5318	8 Waukesha	4/17/2020
15	2	5	Rick Weber	S11W29512 Hwy 18	5318	8 Waukesha	4/20/2020
15	2	4	Tony Webber	615 University Dr.	5318	8 Waukesha	4/20/2020
15	2	10	Kevin Smith	15145 W San Mateo Ct	5315	1 New Berlin	4/21/2020
22	9	6	Nathan Krueger	1902 E. Broadway # 425	5318	6 Waukesha	5/5/2020
28	8	4	Jeremy Swanson	2940 Clearwater Ln	5318	9 Waukesha	5/11/2020
33	10	5	William Yeager	1904 Easy Street	5318	8 Waukesha	5/20/2020
38	4	3	Tom Schueller	1002 Oakland Avenue	5318	6 Waukesha	5/18/2020
38	4	10	Ryan Gardner	2006 Garland Ave	5318	8 Waukesha	5/18/2020
51	8	3	Taylor Murphy	728 W. St. Paul Ave. #14	5318	8 Waukesha	5/27/2020
51	8	3	Sarah Nelson	728 W. St. Paul Ave. #14	5318	8 Waukesha	5/27/2020
54	3	1	Michael Kantor	14550 W Honey Ln	5315	1 New Berlin	5/2/2020
56	10	7	Michael Kantor	14550 W Honey Ln	5315	1 New Berlin	5/2/2020
57	9	3	Cory Landry	408 North Moreland Blvd.	5318	8 Waukesha	5/30/2020
58	7	6	Ken Boyd	206 W Roberta Ave	5318	6 Waukesha	5/22/2020
58	7	7	Doris Boyd	206 W Roberta Ave	5318	6 Waukesha	5/22/2020
76	81*	9	Jane Hawthorne	2014 S Grand Ave	5318	9 Waukesha	5/2/2020
89	98	1	Sherri Jaeger	18800 W National Ave	5314	6 New Berlin	4/21/2020

89	98	2	Cindy Slipperly	21560 W Beeheim Rd	5314 6	New Berlin	4/24/2020
89	98	3	Doug Slipperly	21560 W Beeheim Rd	5314 6	New Berlin	4/24/2020
89	98	4	Kayla Garny	20800 W Cleveland Ave	5314 6	New Berlin	4/24/2020
89	98	5	Julia Garny	20800 W Cleveland Ave	5314 6	New Berlin	4/24/2020
90	5x*	8	Darlene Balfanz	21075 George Hunt Circle	5318 6	Waukesha	5/2/2020
90	5x*	9	Wendy Diermeier	1307 Larchmont dr	5318 6	Waukesha	5/2/2020
92	4	7	Austin Fox	411 E Newhall Ave	5318 6	Waukesha	5/13/2020
93	86*	7	Wesley Dawes	2954 S Moorland Rd	5315 1	New Berlin	5/2/2020
94	1	7	Jon Heyk*	900 Western Ave	5318 8	Waukesha	5/31/2020
117	4bY	2	Michael Sarenac	2250 W. Mallory Ave.	5322 1	Milwaukee	5/8/2020

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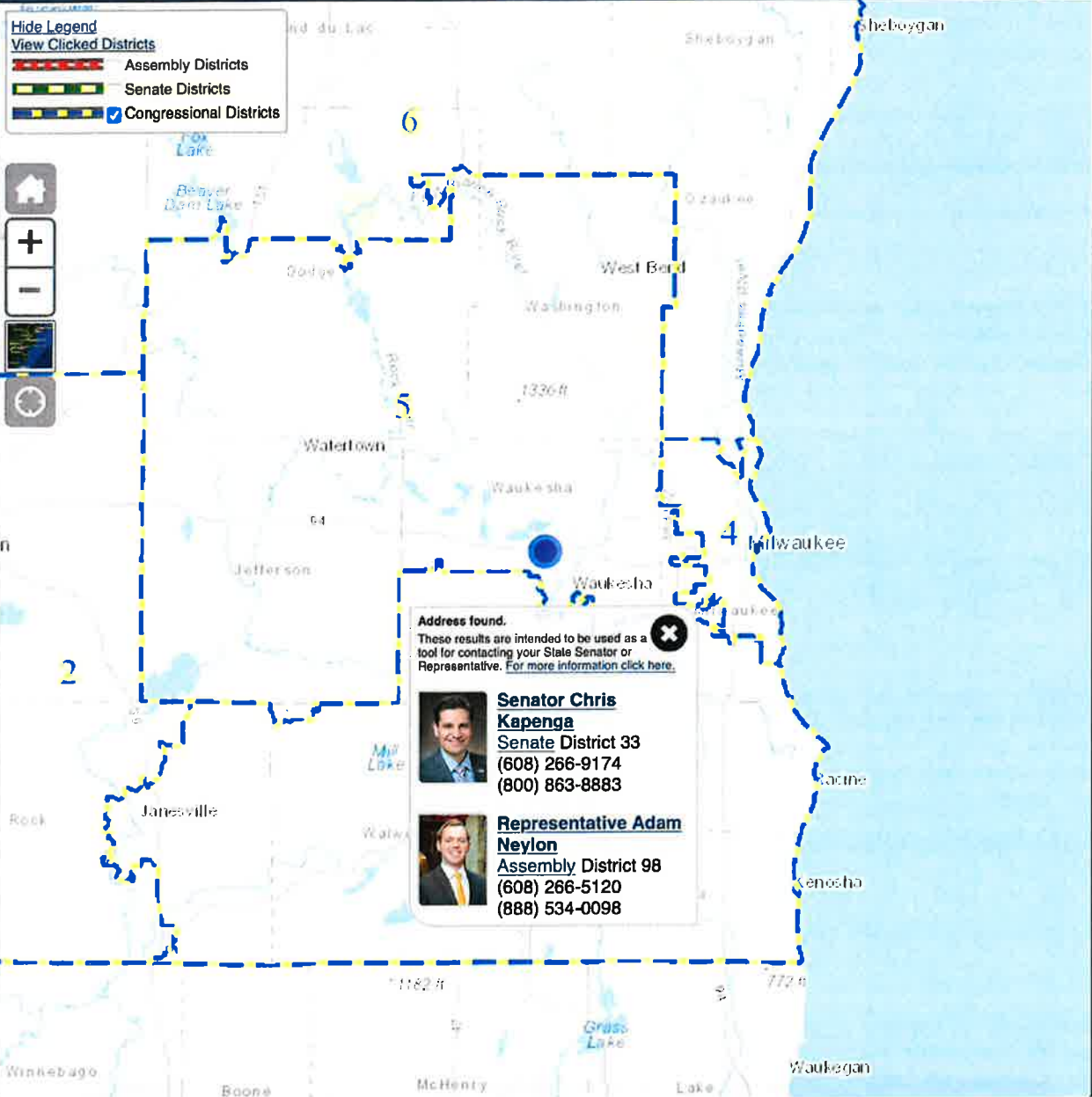
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	Senator Chris Kapenga Senate District 33 (608) 266-9174 (800) 863-8883
	Representative Scott Allen Assembly District 97 (608) 266-8580 (888) 534-0097

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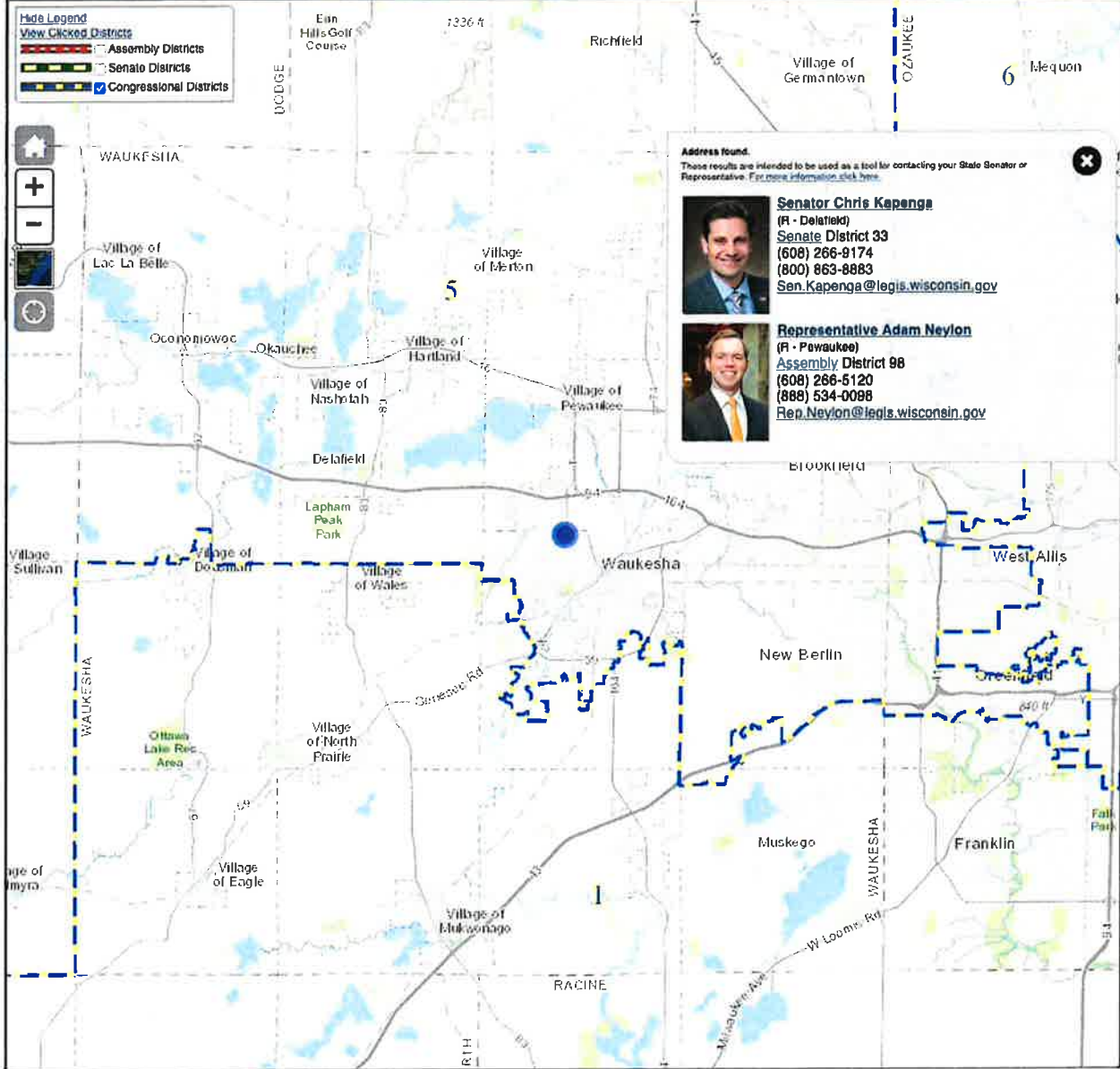
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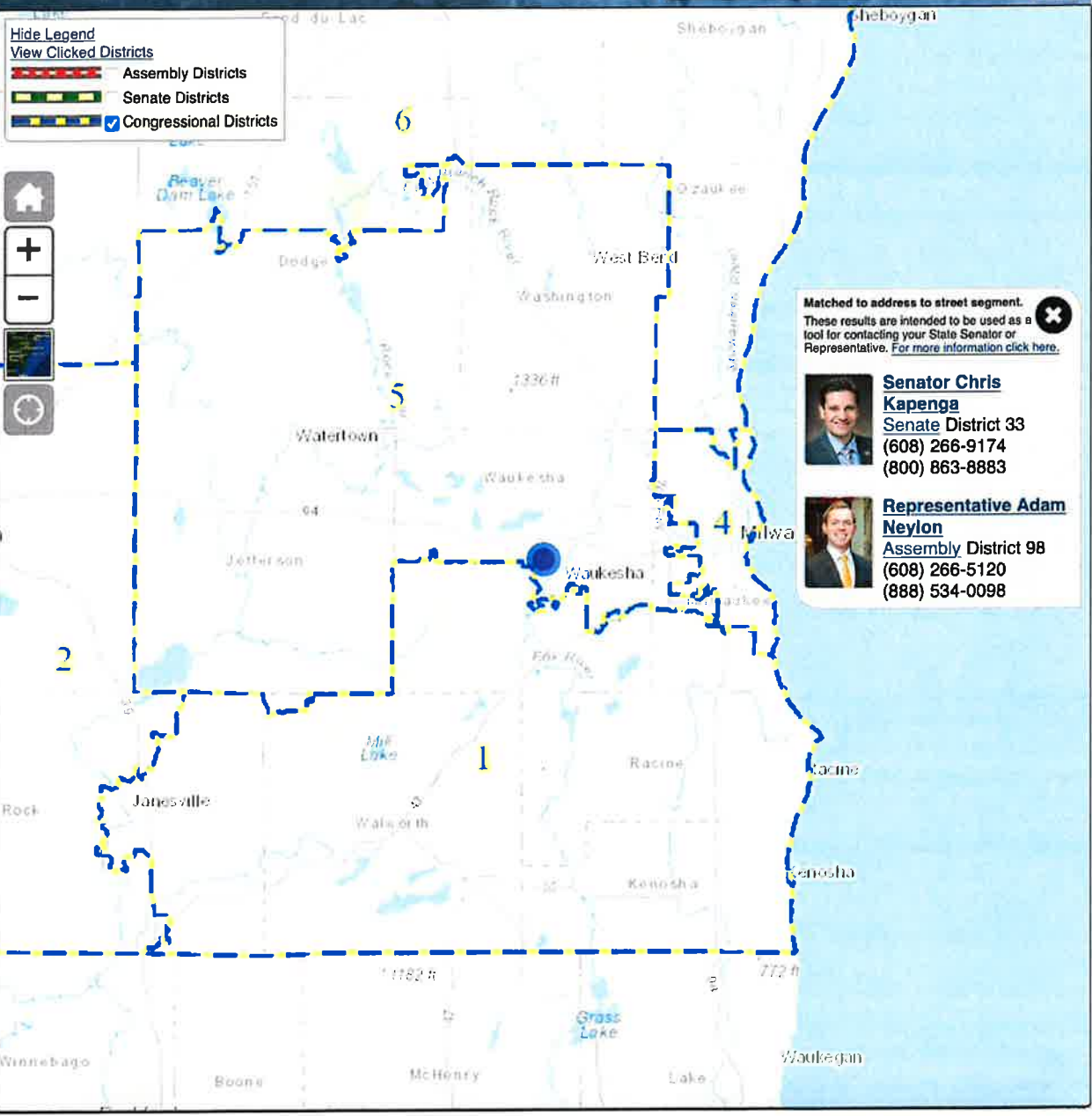
Senator Chris Kapenga
(R - Delafield)
Senate District 33
(608) 266-9174
(800) 863-8883
Sen.Kapenga@legis.wisconsin.gov



Representative Adam Neylon
(R - Pewaukee)
Assembly District 98
(608) 266-5120
(888) 534-0088
Rep.Neylon@legis.wisconsin.gov

2501 summit ave, Waukesha, Wisconsin, 531

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(800) 863-8883



Representative Adam Neylon
Assembly District 98
(608) 266-5120
(888) 534-0098

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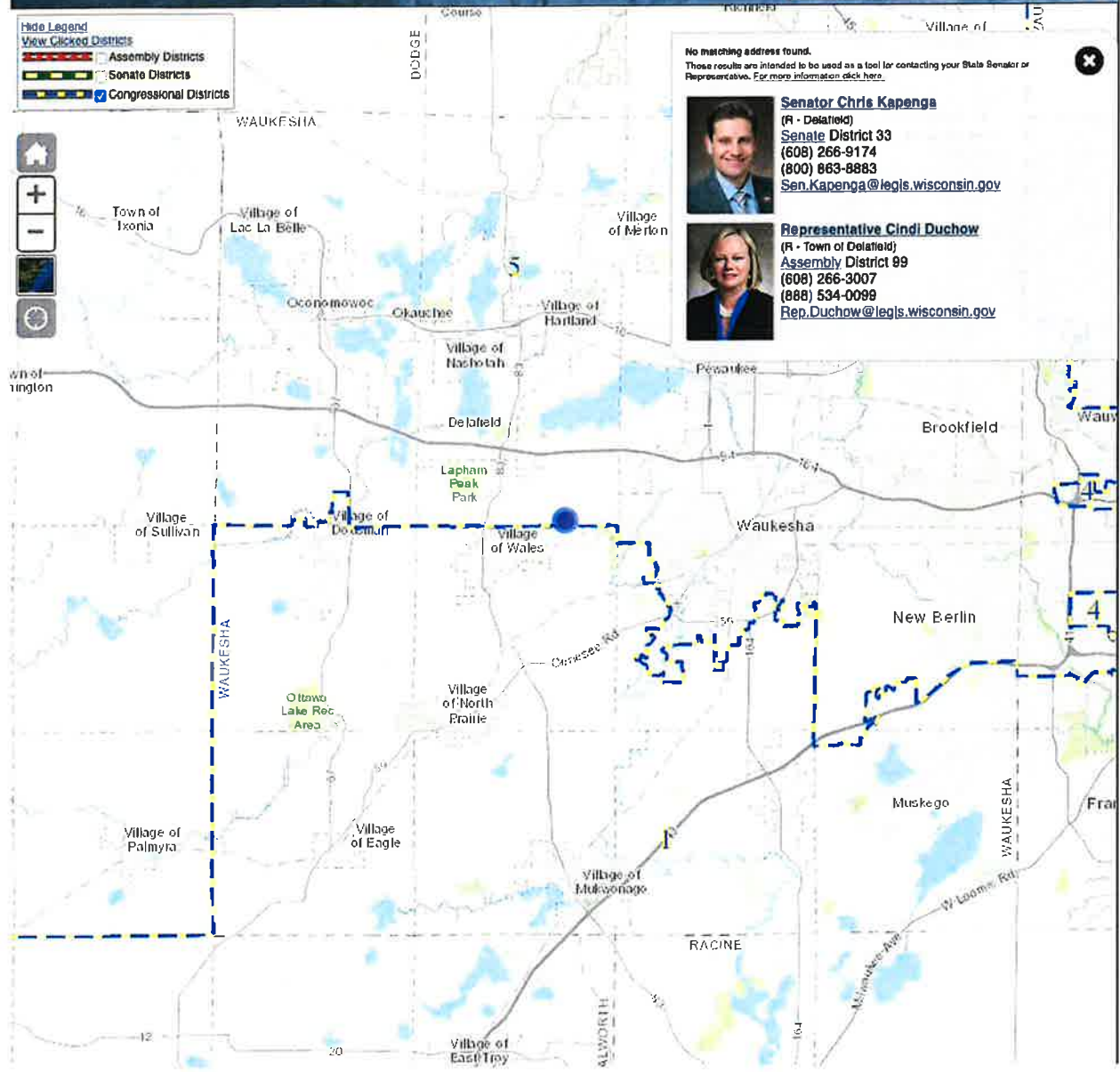
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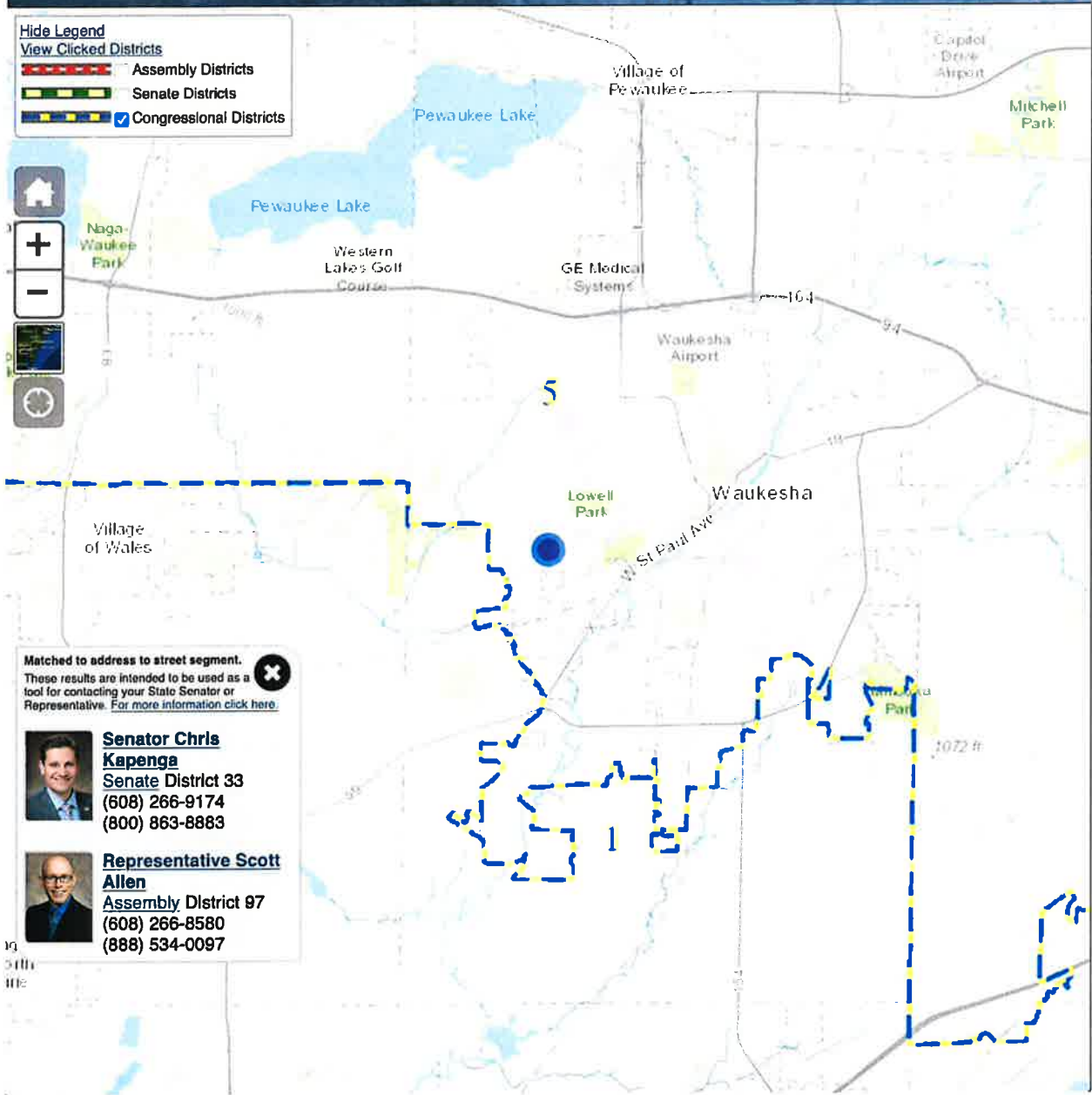
Senator Chris Kapenga
(R - Delafield)
Senate District 33
(608) 266-9174
(800) 863-8883
Sen.Kapenga@legis.wisconsin.gov



Representative Cindi Duchow
(R - Town of Delafield)
Assembly District 89
(608) 266-3007
(888) 534-0099
Rep.Duchow@legis.wisconsin.gov



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Representative Scott Allen
Assembly District 97
(608) 266-8580
(888) 534-0097

15145 W San Mateo Ct, New Berlin, Wiscons

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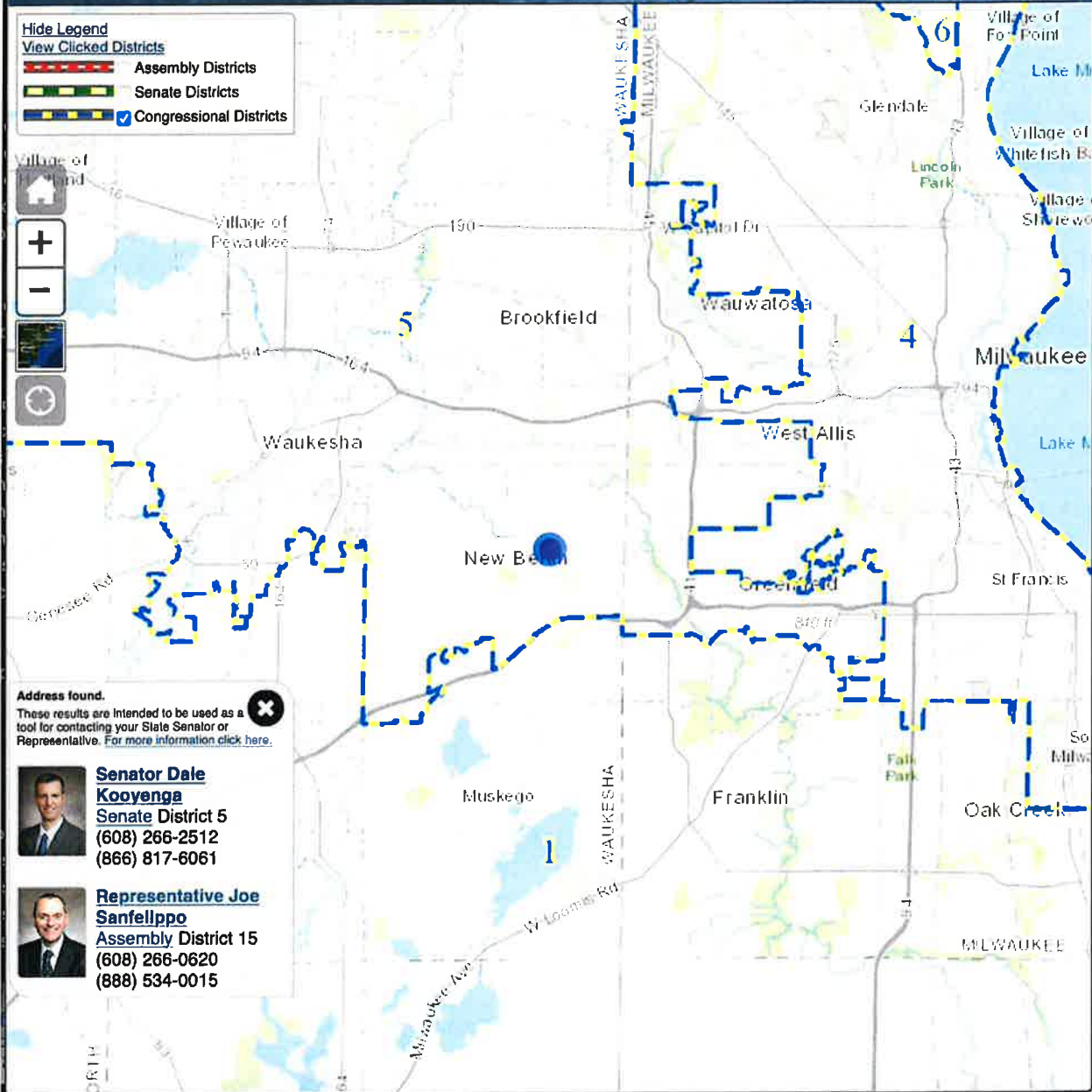
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Senator Dale Kooyenga
Senate District 5
(608) 266-2512
(866) 817-6061



Representative Joe Sanfelippo
Assembly District 15
(608) 266-0620
(888) 534-0015



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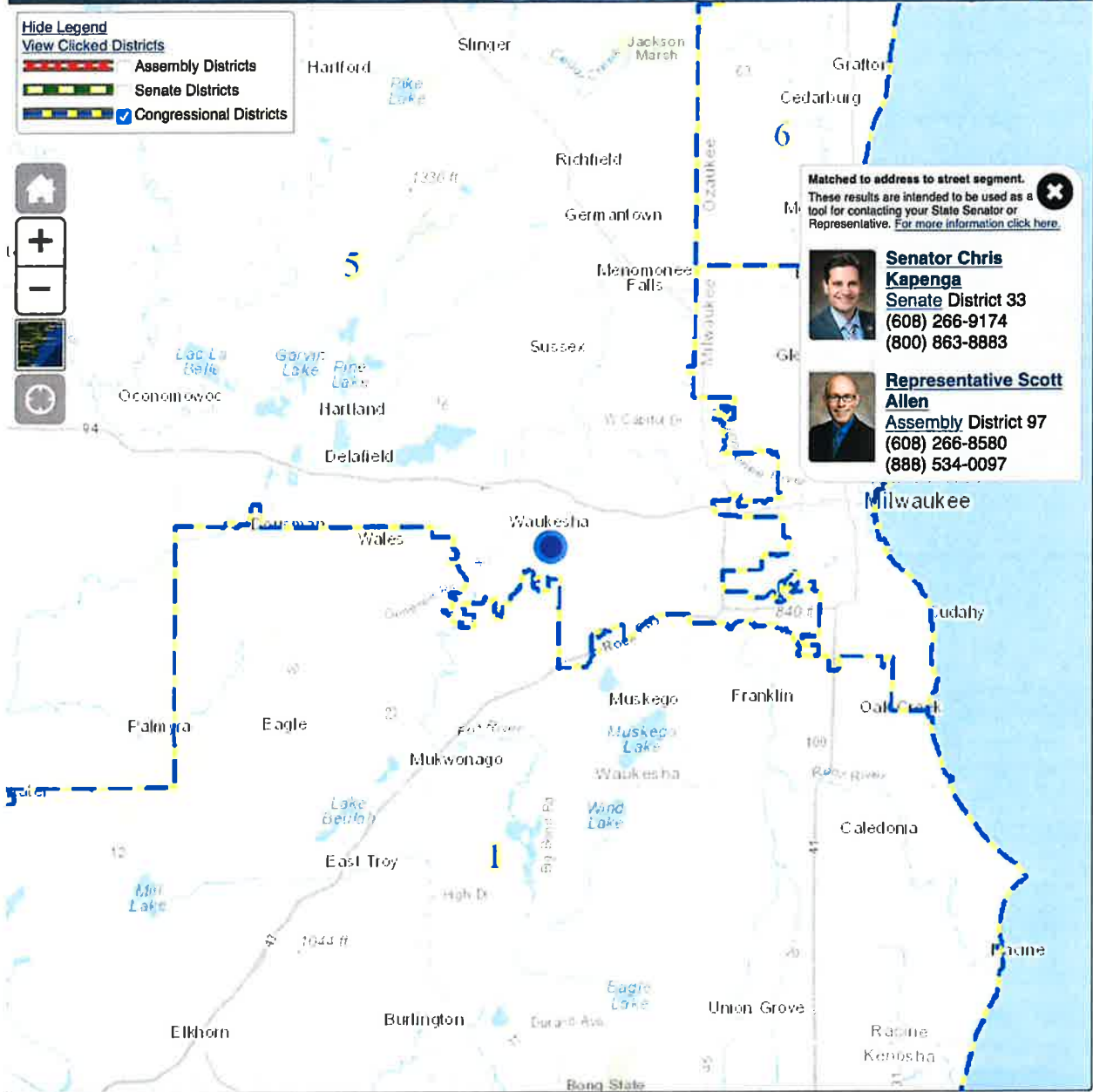
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Assembly District 97
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(888) 534-0097



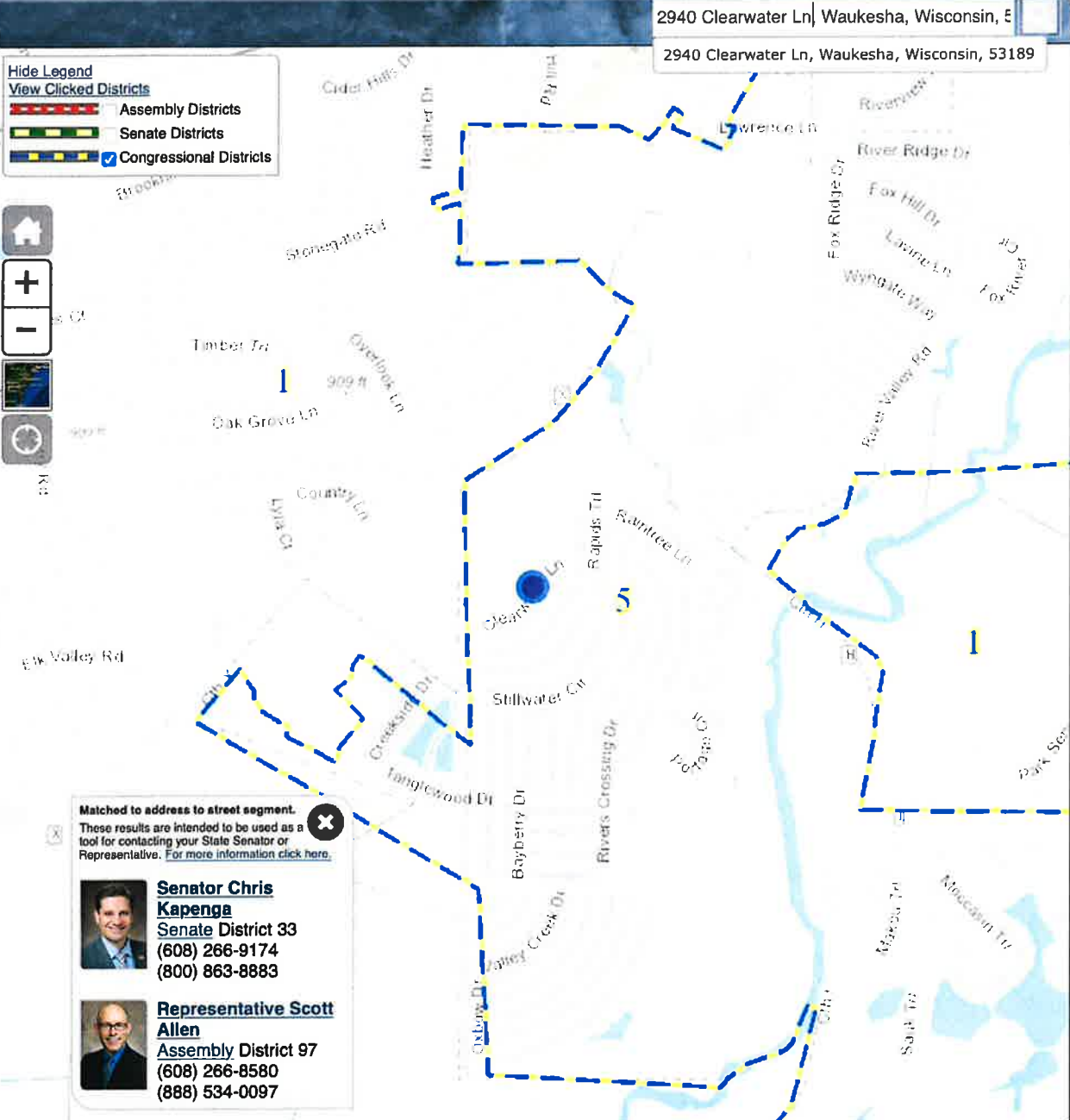
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2940 Clearwater Ln, Waukesha, Wisconsin, 53189

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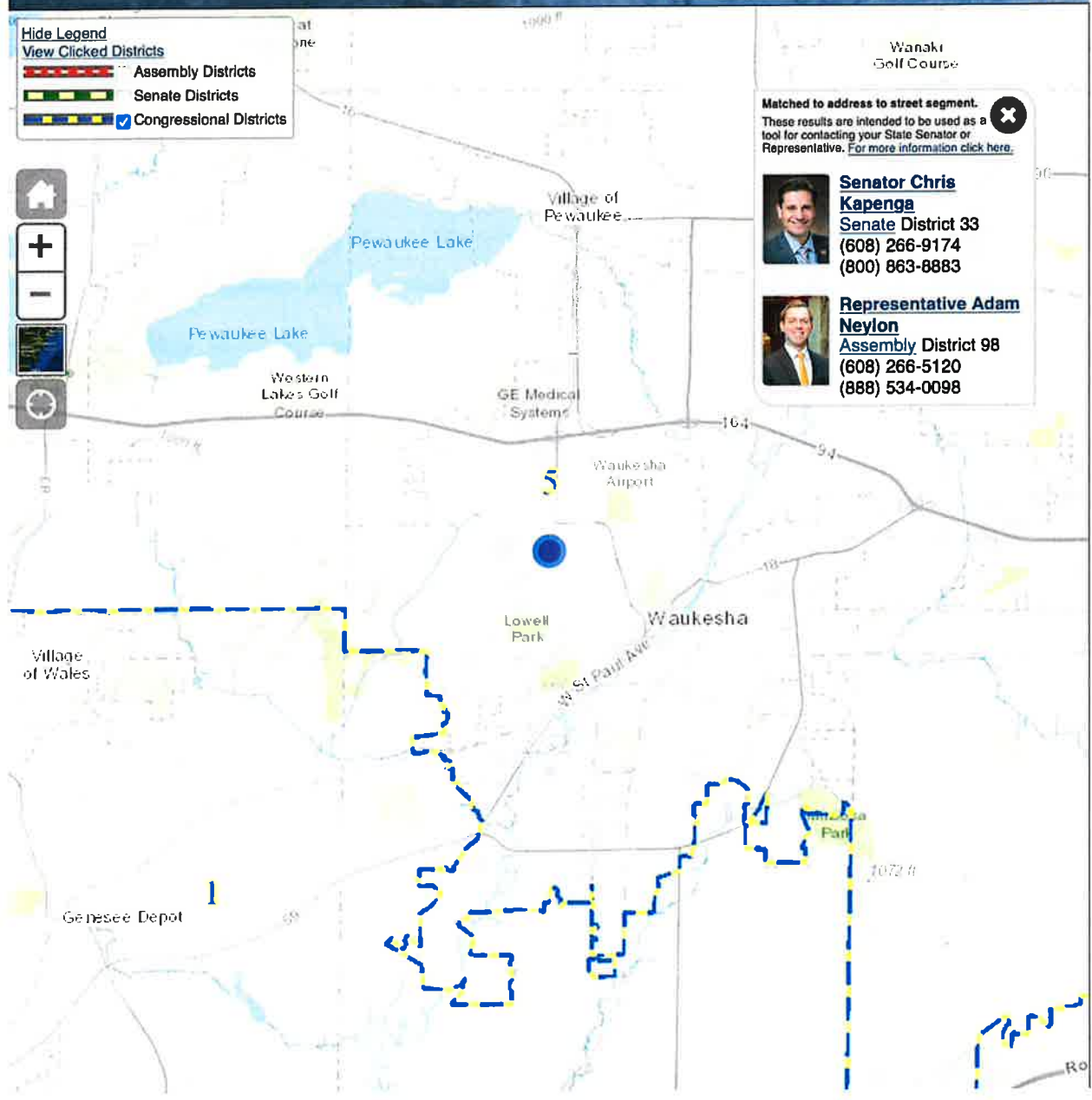


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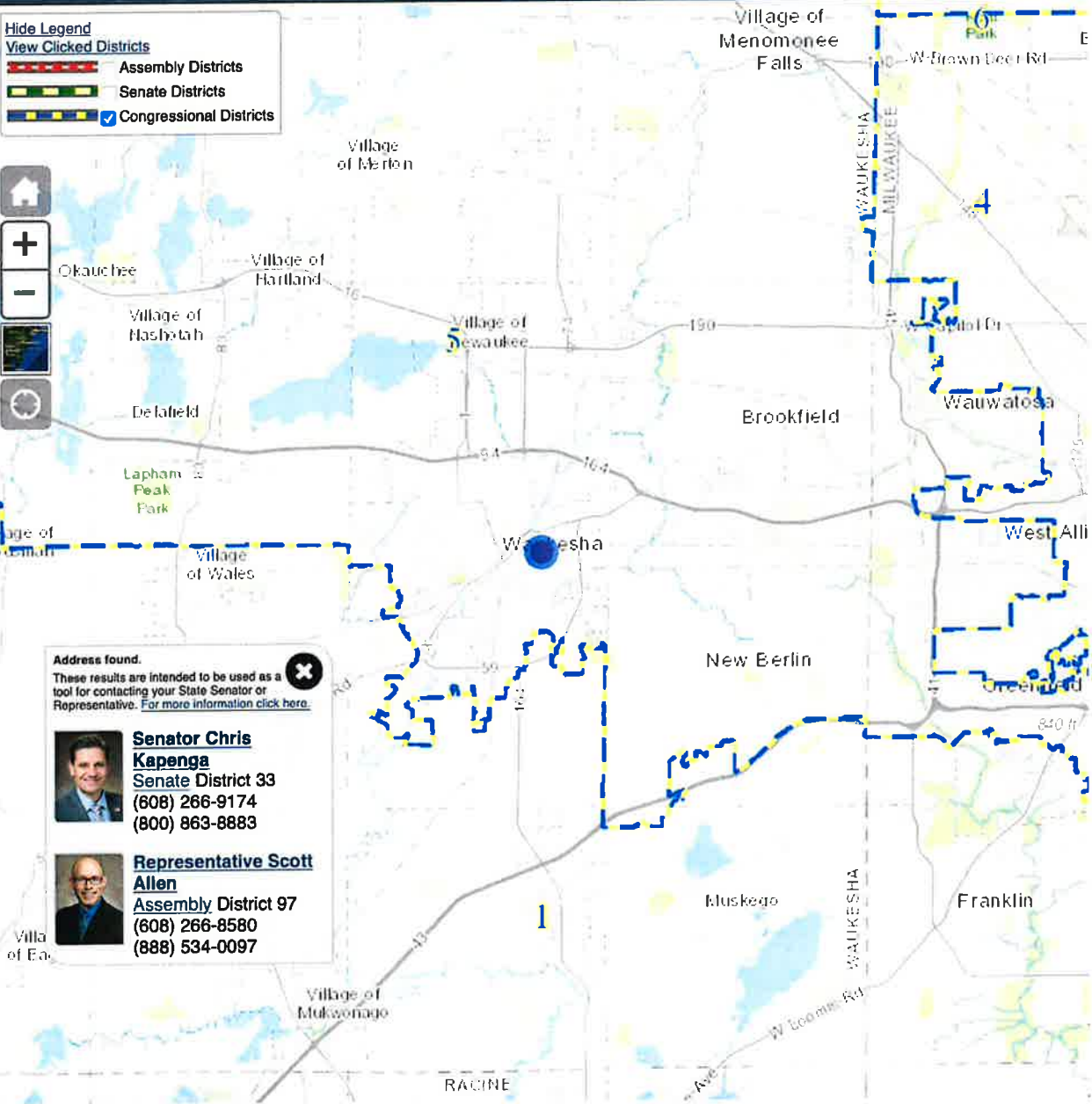
Senator Chris Kapenga
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(800) 863-8883

Representative Adam Neylon
Assembly District 98
(608) 266-5120
(888) 534-0098

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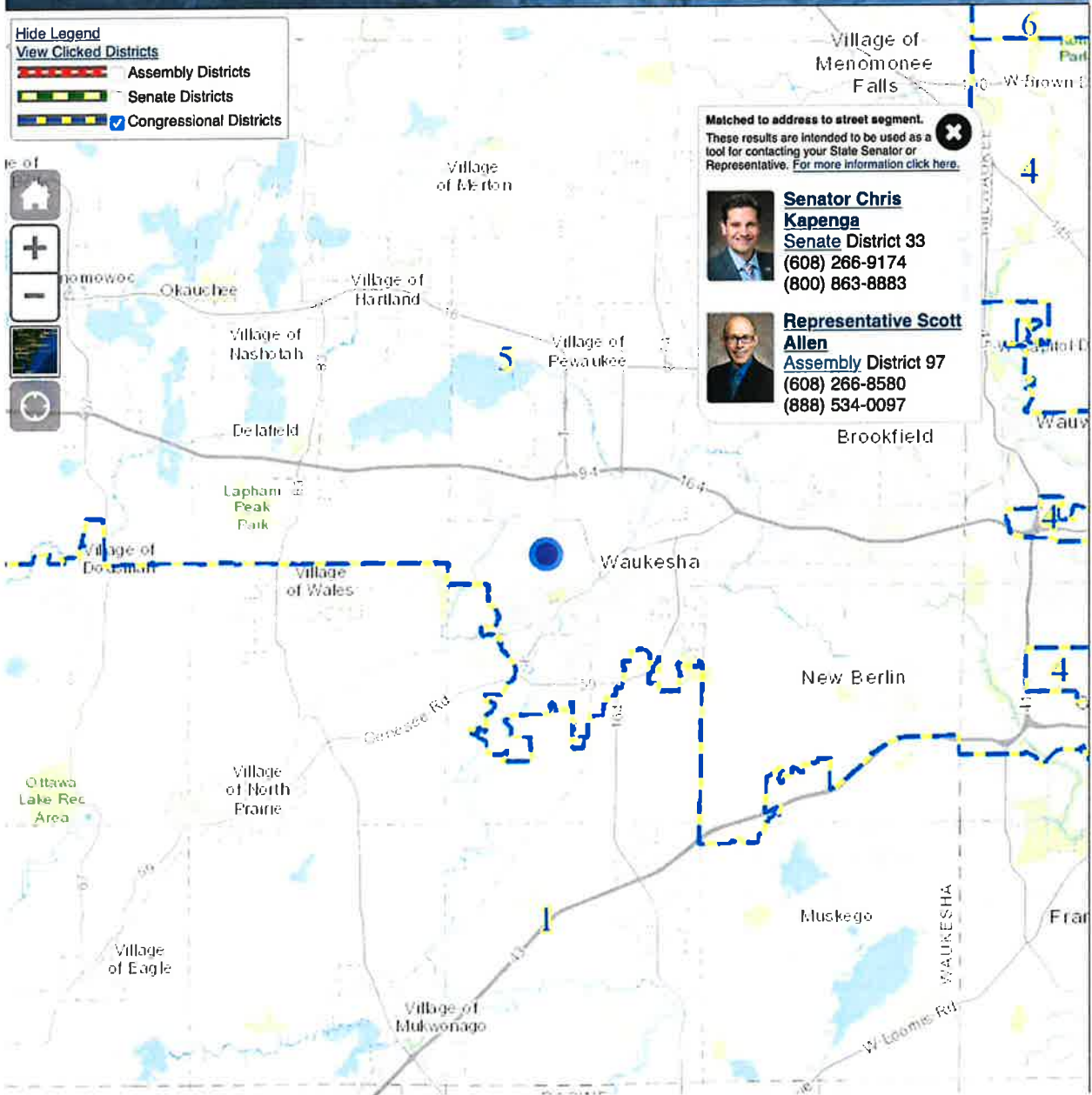
**Senator Chris Kapenga**
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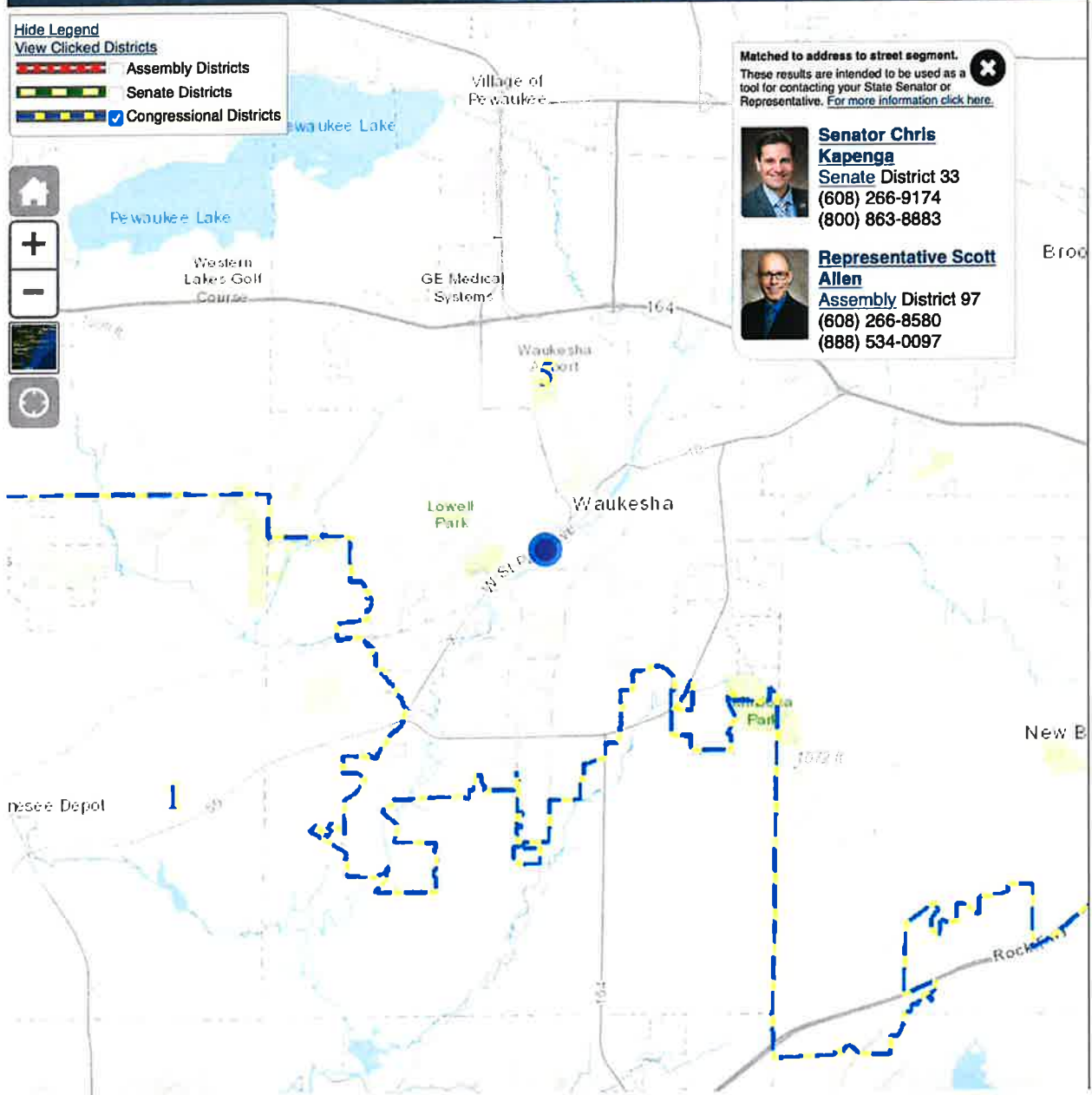
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14550 W Honey Ln., New Berlin Wisconsin, 5

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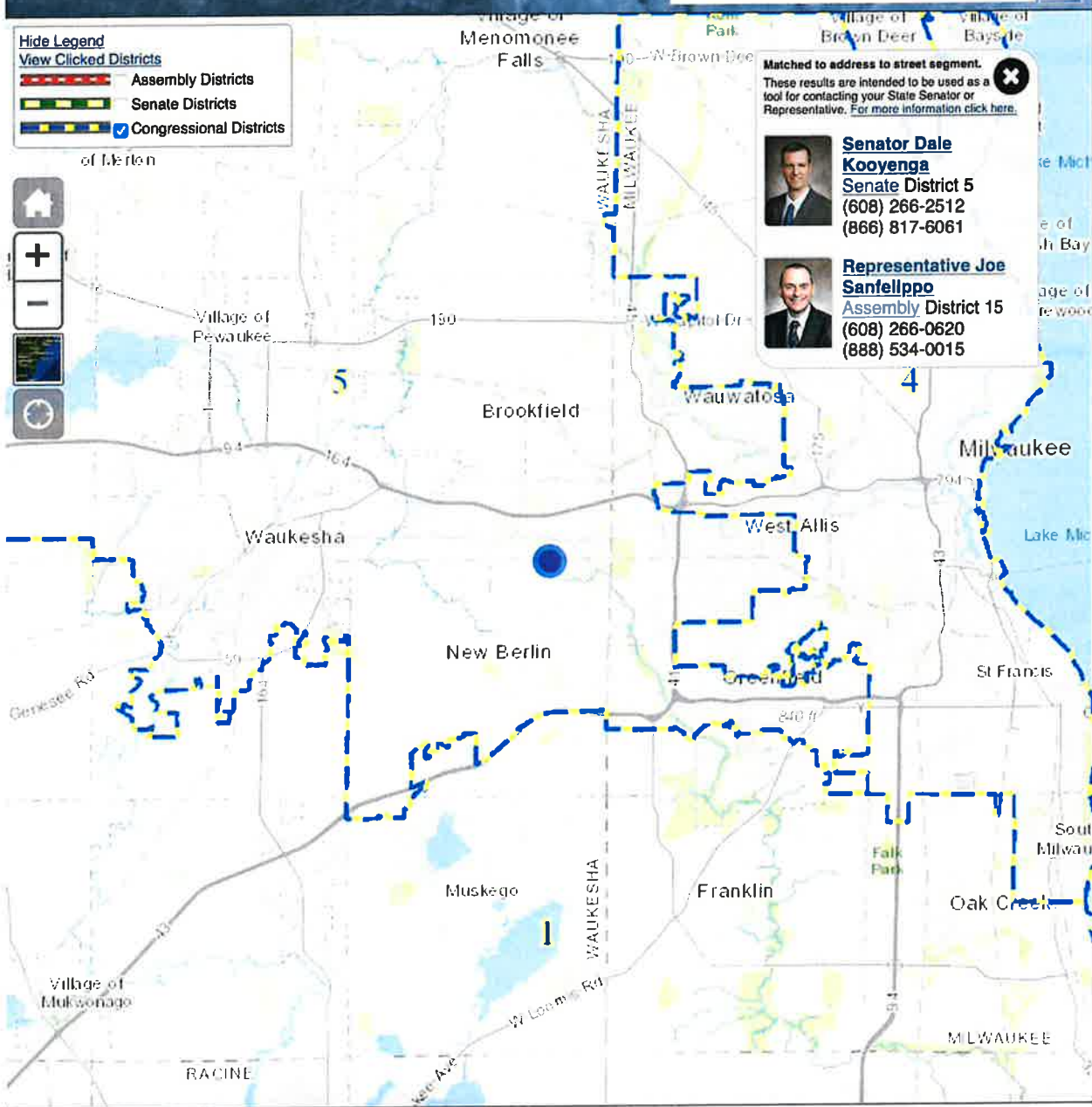
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Senate District 5
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(866) 817-6061

Representative Joe Sanfelippo
Assembly District 15
(608) 266-0620
(888) 534-0015



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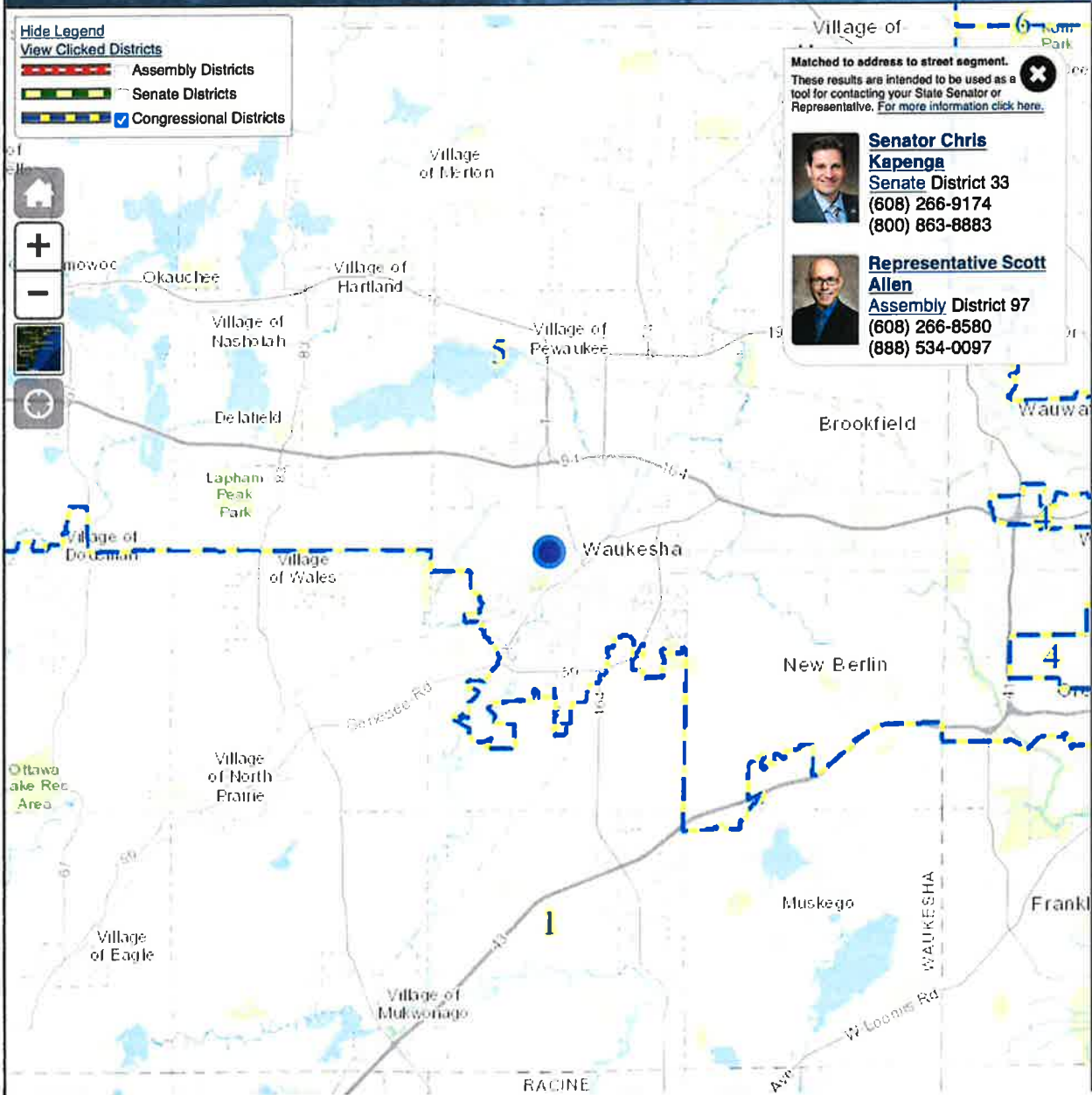
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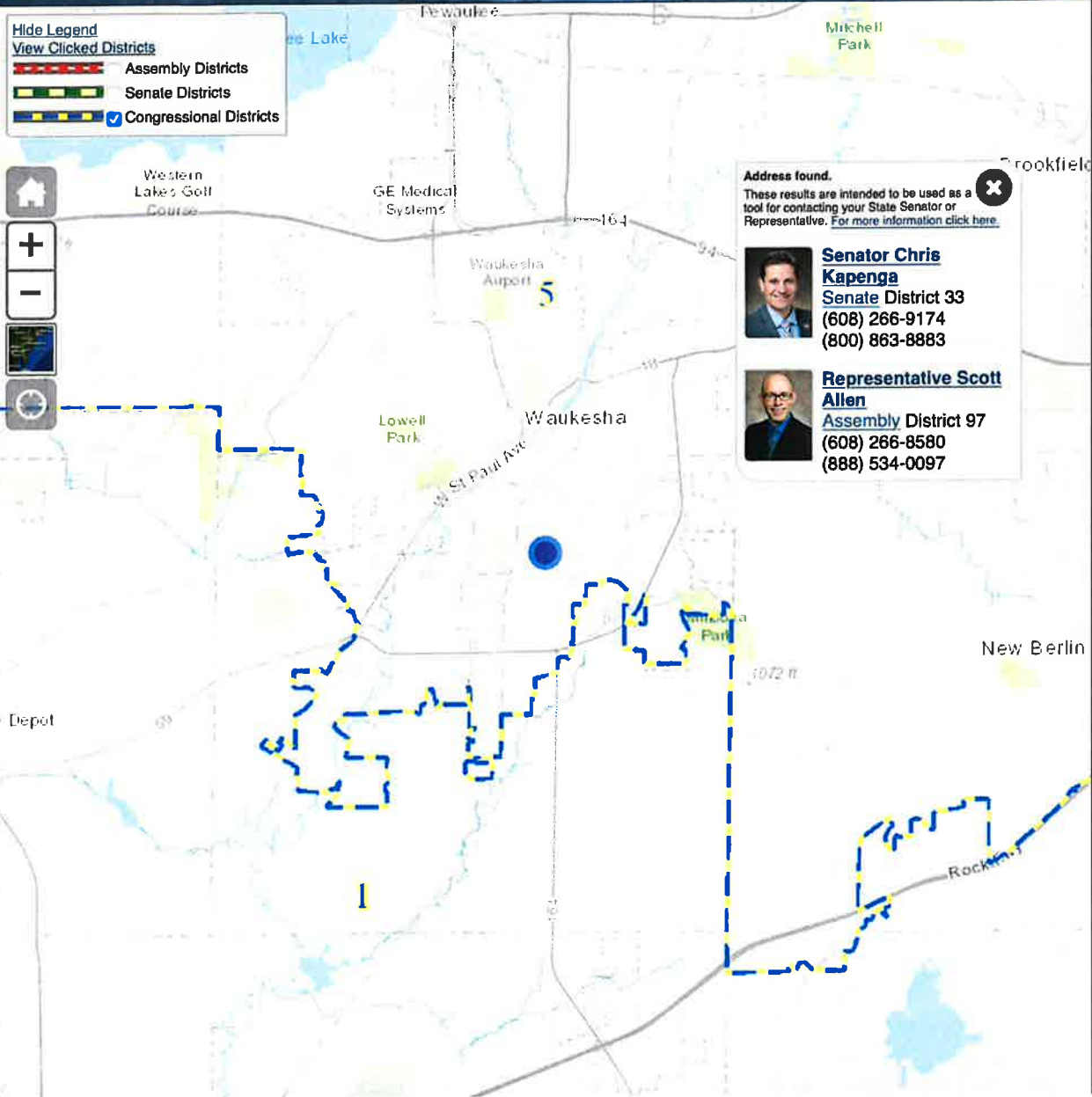
Representative Scott Allen
Assembly District 97
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(888) 534-0097



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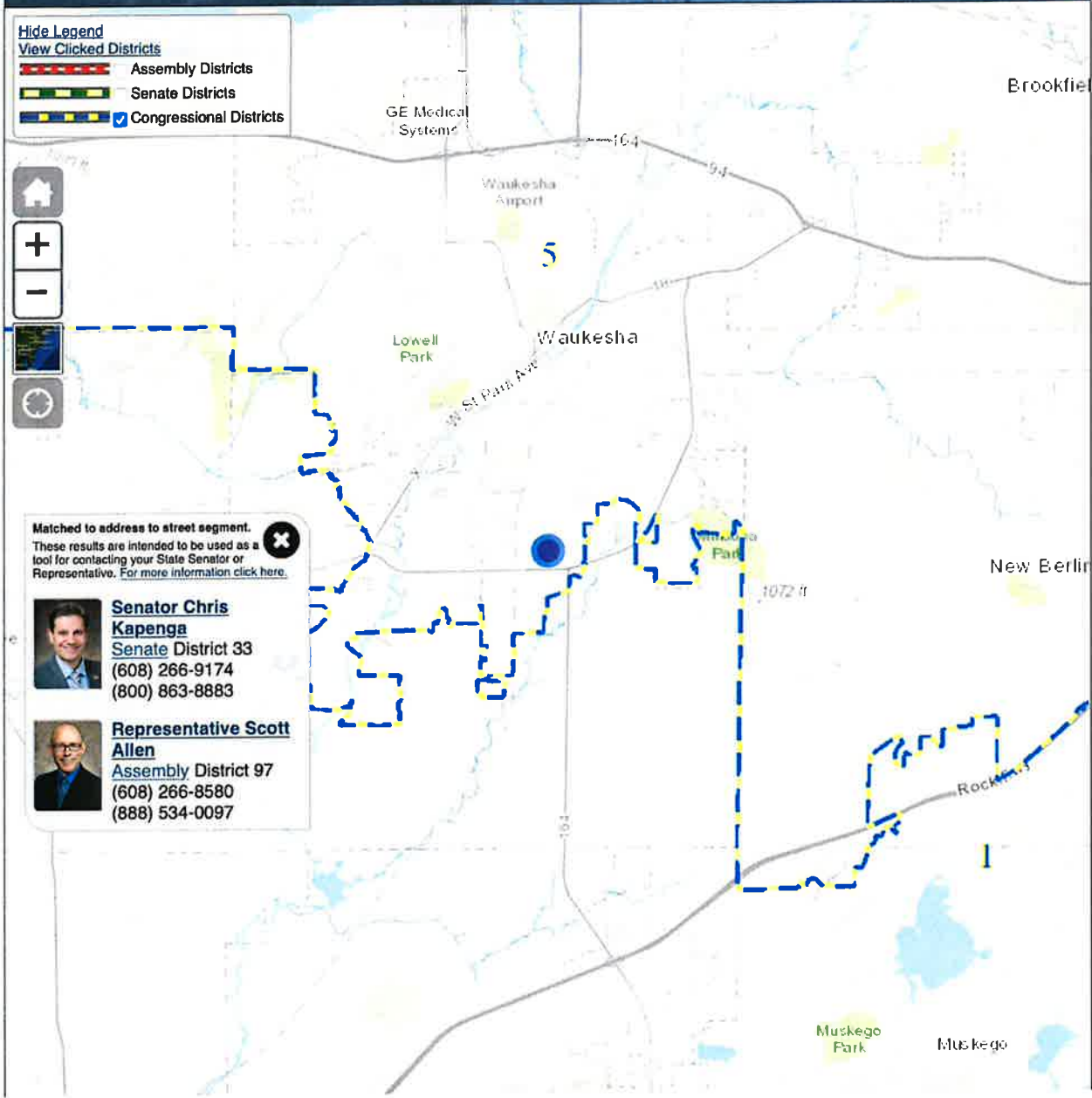
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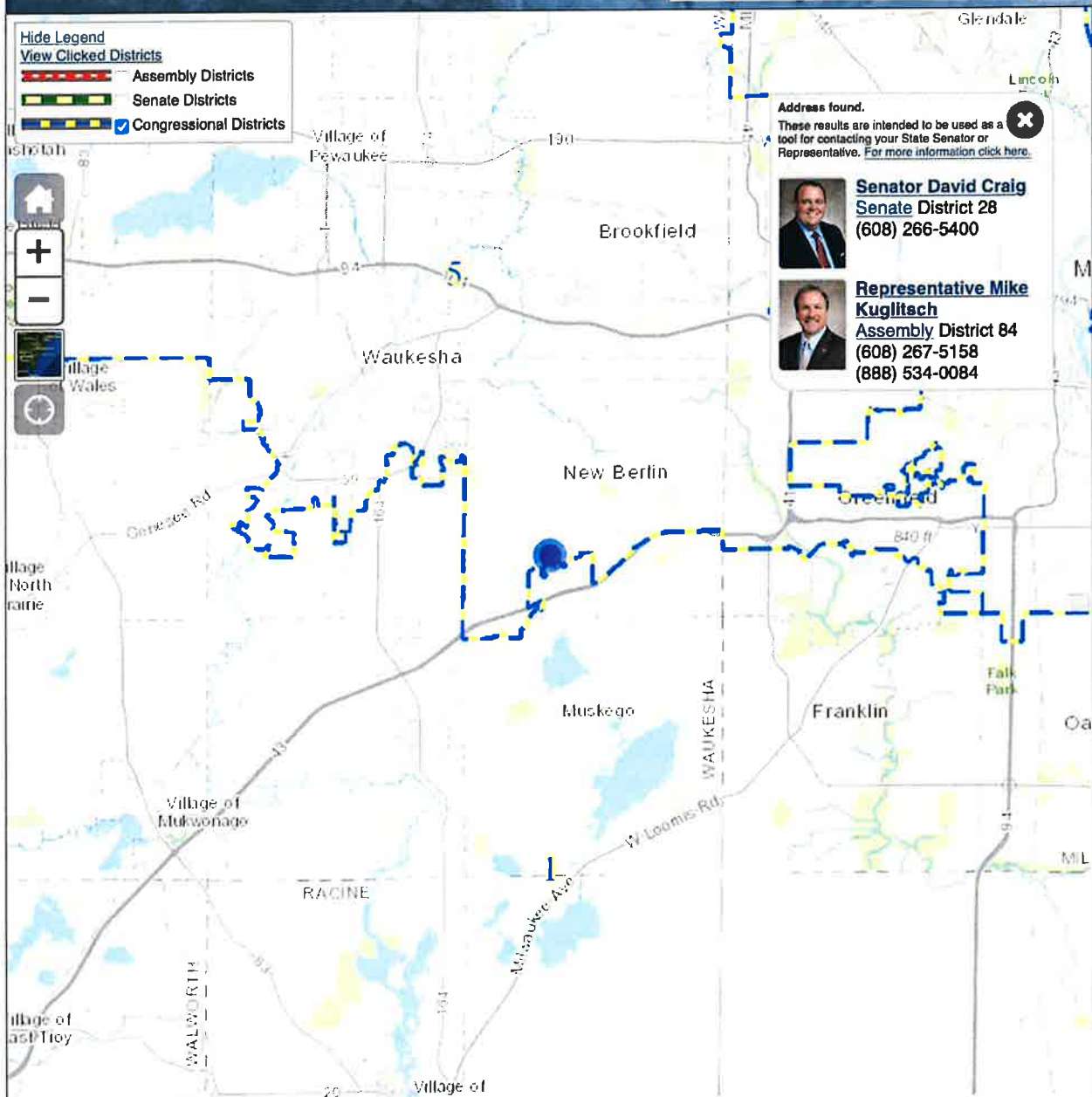
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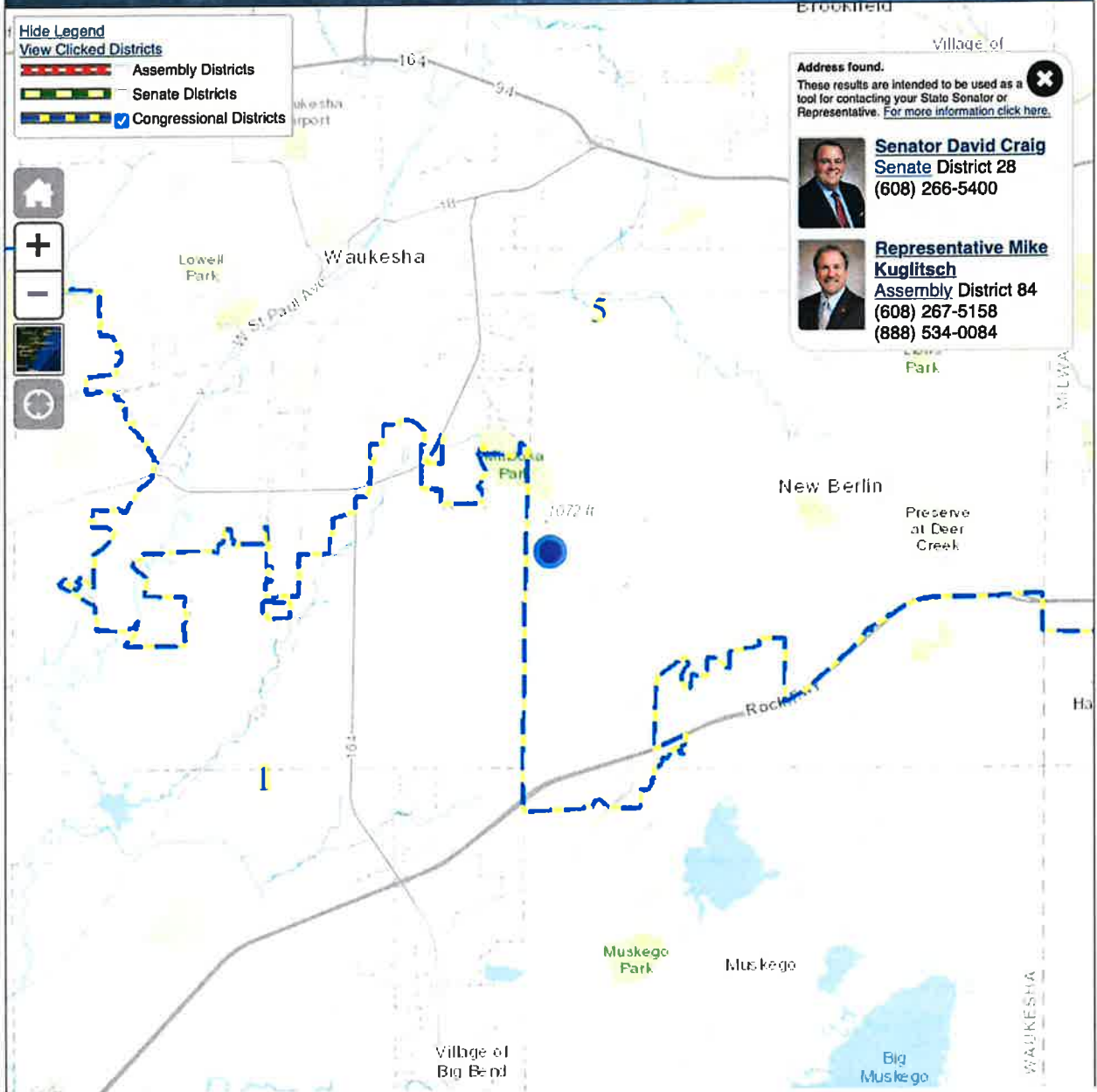


Senator David Craig
Senate District 28
(608) 266-5400



Representative Mike Kuglitsch
Assembly District 84
(608) 267-5158
(888) 534-0084

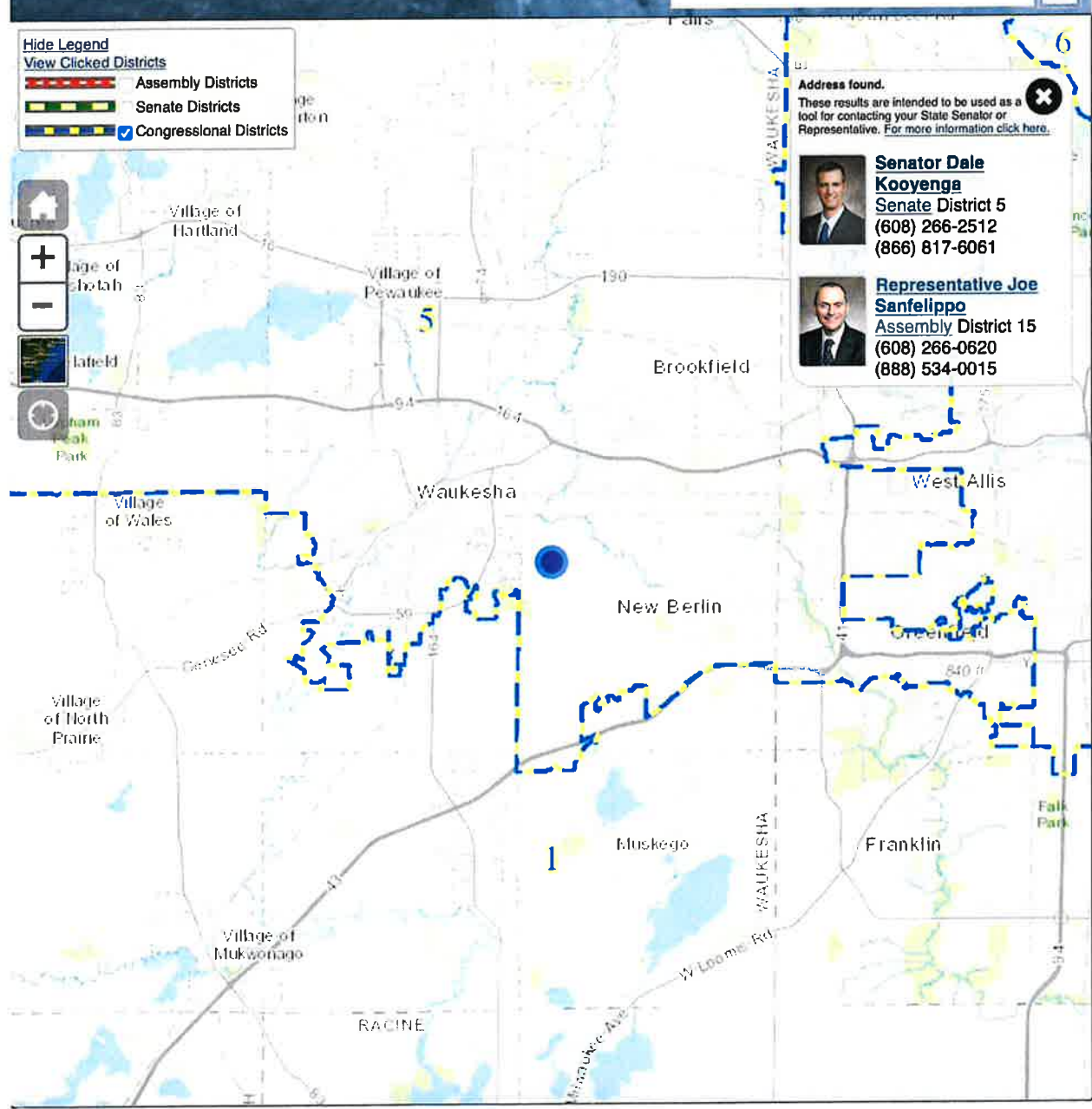




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Representative Joe Sanfelippo
Assembly District 15
(608) 266-0620
(888) 534-0015

21075 George Hunt Circle waukesha Wiscon:

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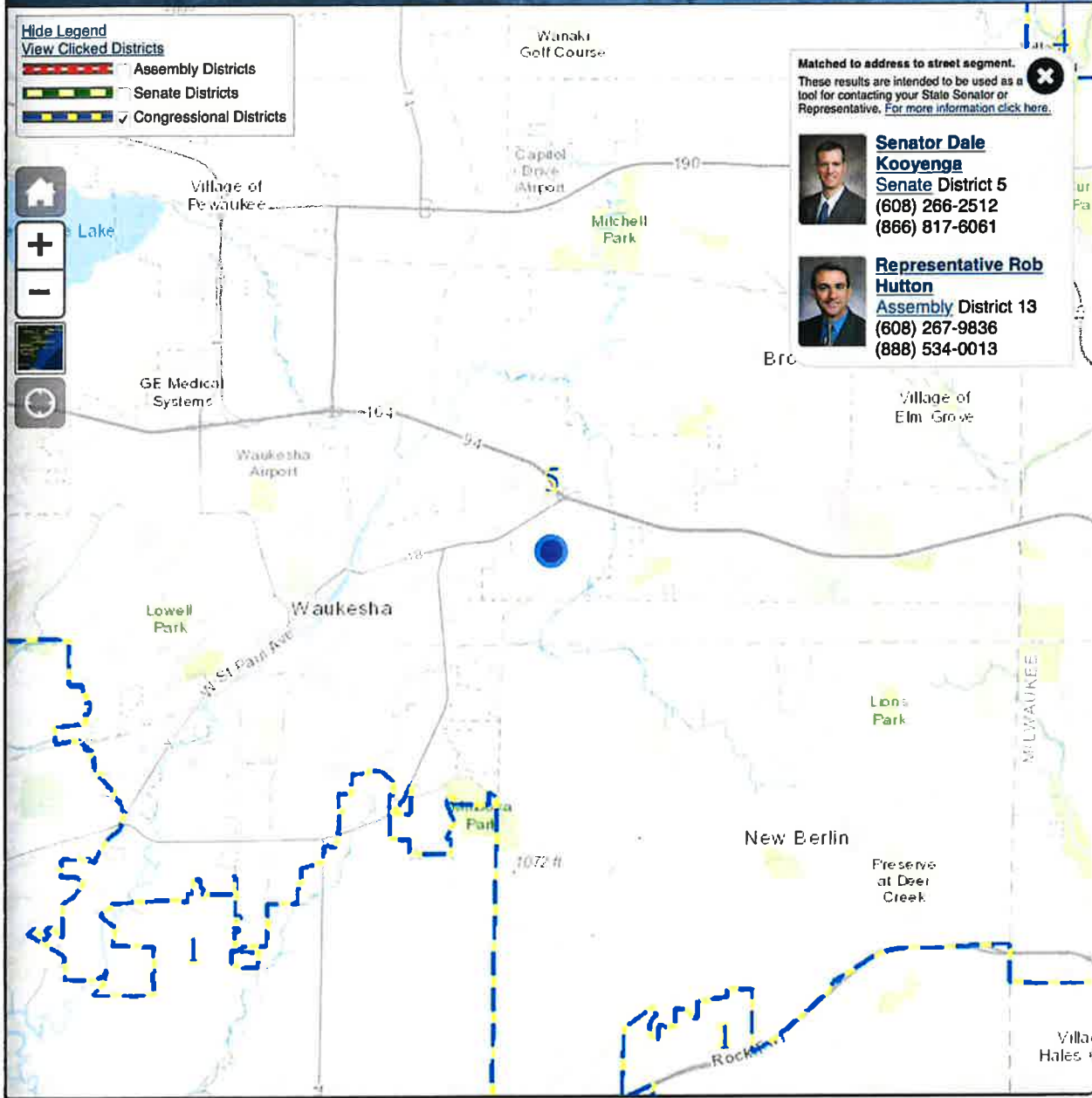
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Senate District 5
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(866) 817-6061

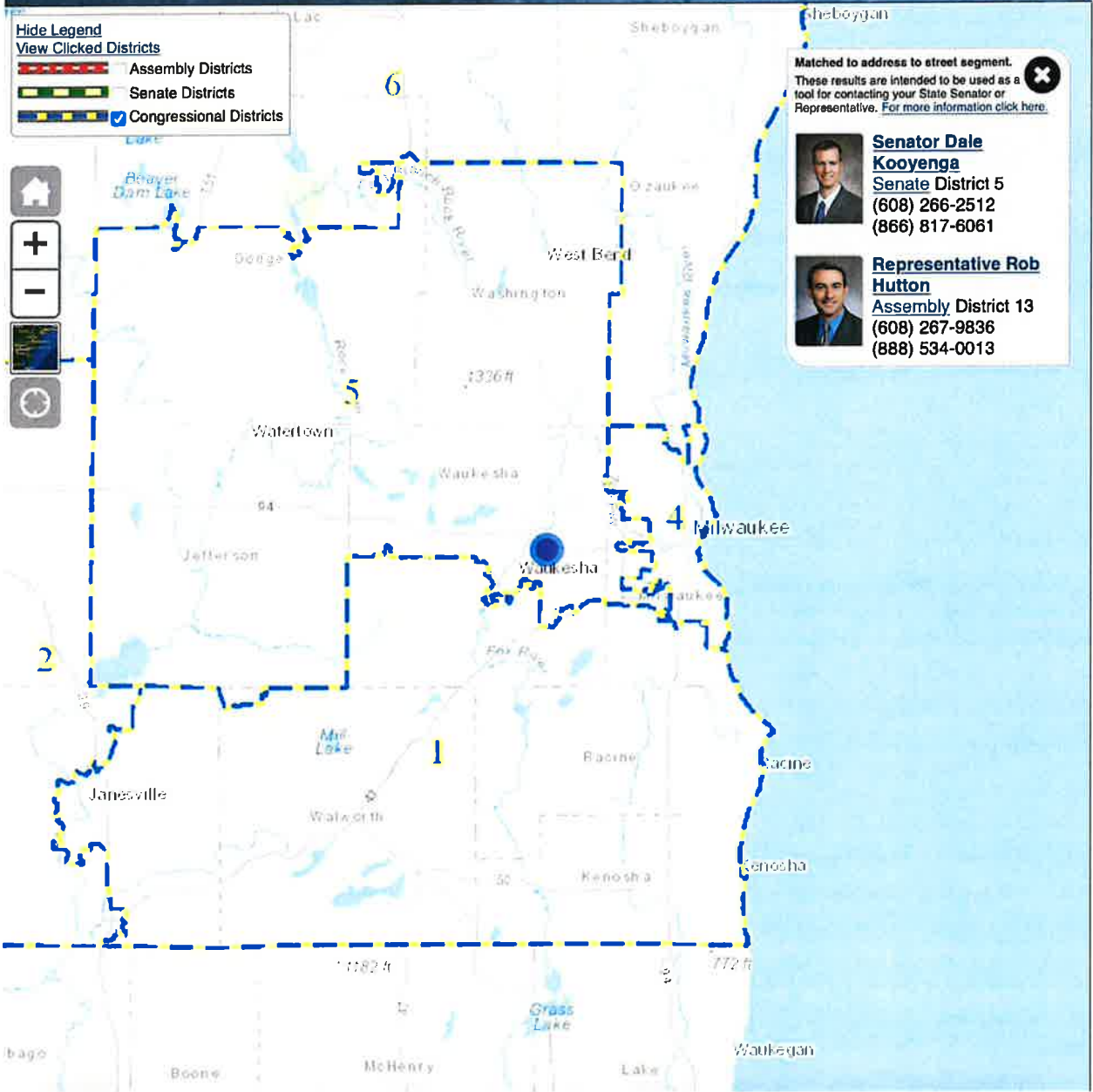
 **Representative Rob Hutton**
Assembly District 13
(608) 267-9836
(888) 534-0013



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Assembly District 13
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(888) 534-0013

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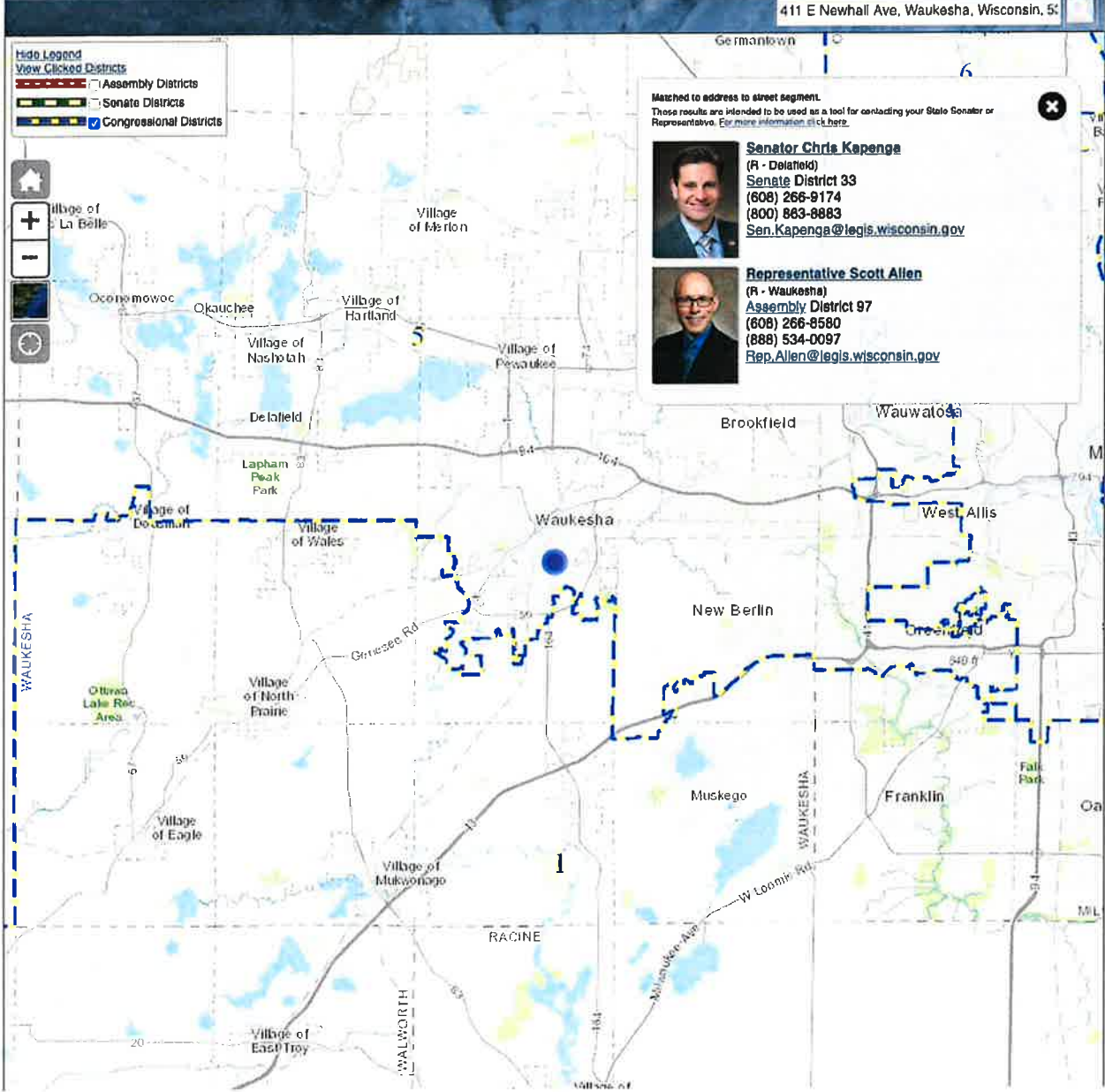
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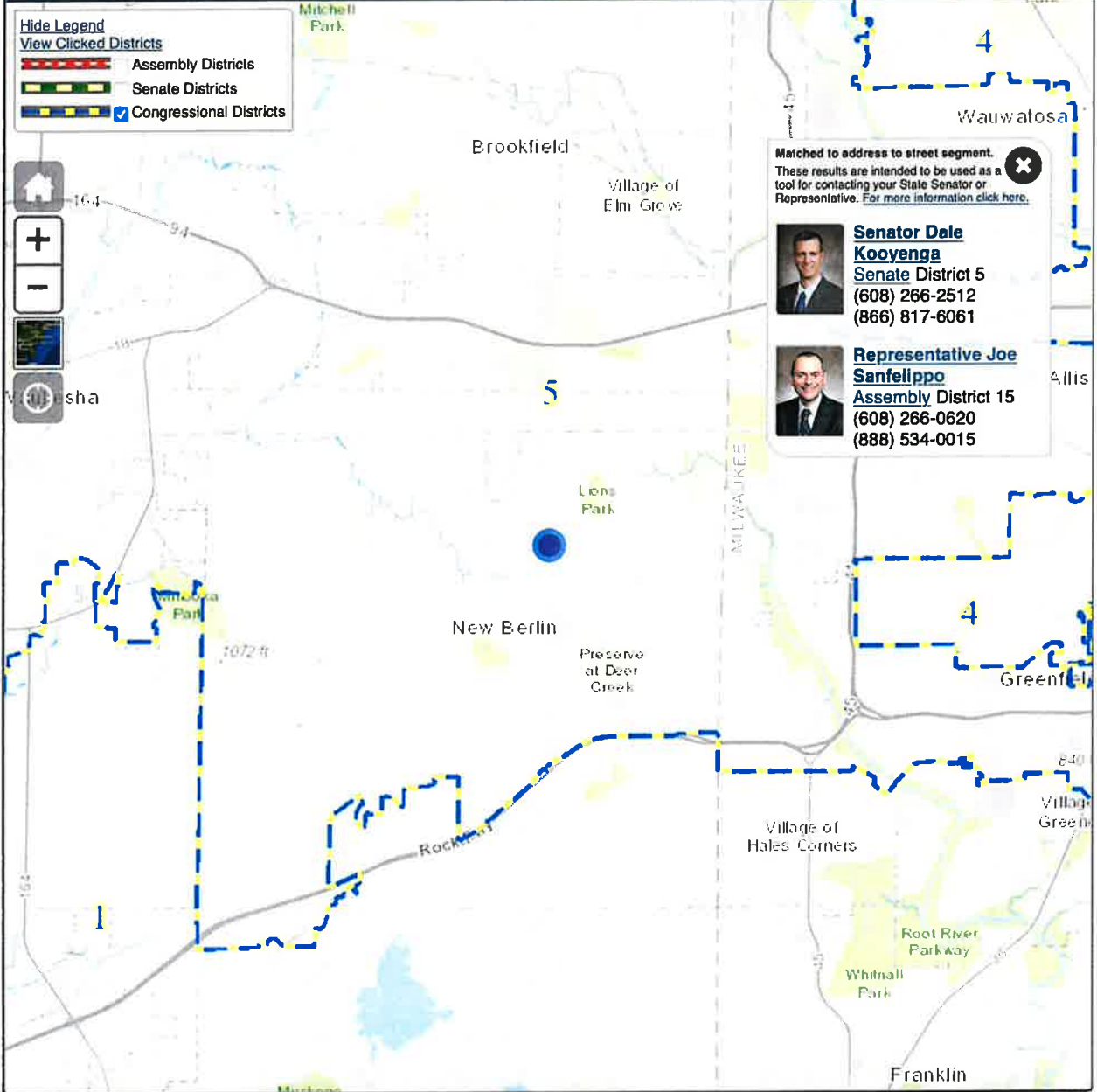
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(R - Delafield)
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(608) 266-9174
(800) 883-8883
Sen.Kapenga@legis.wisconsin.gov

 **Representative Scott Allen**
(R - Waukesha)
Assembly District 97
(608) 266-8580
(888) 534-0097
Rep.Allen@legis.wisconsin.gov





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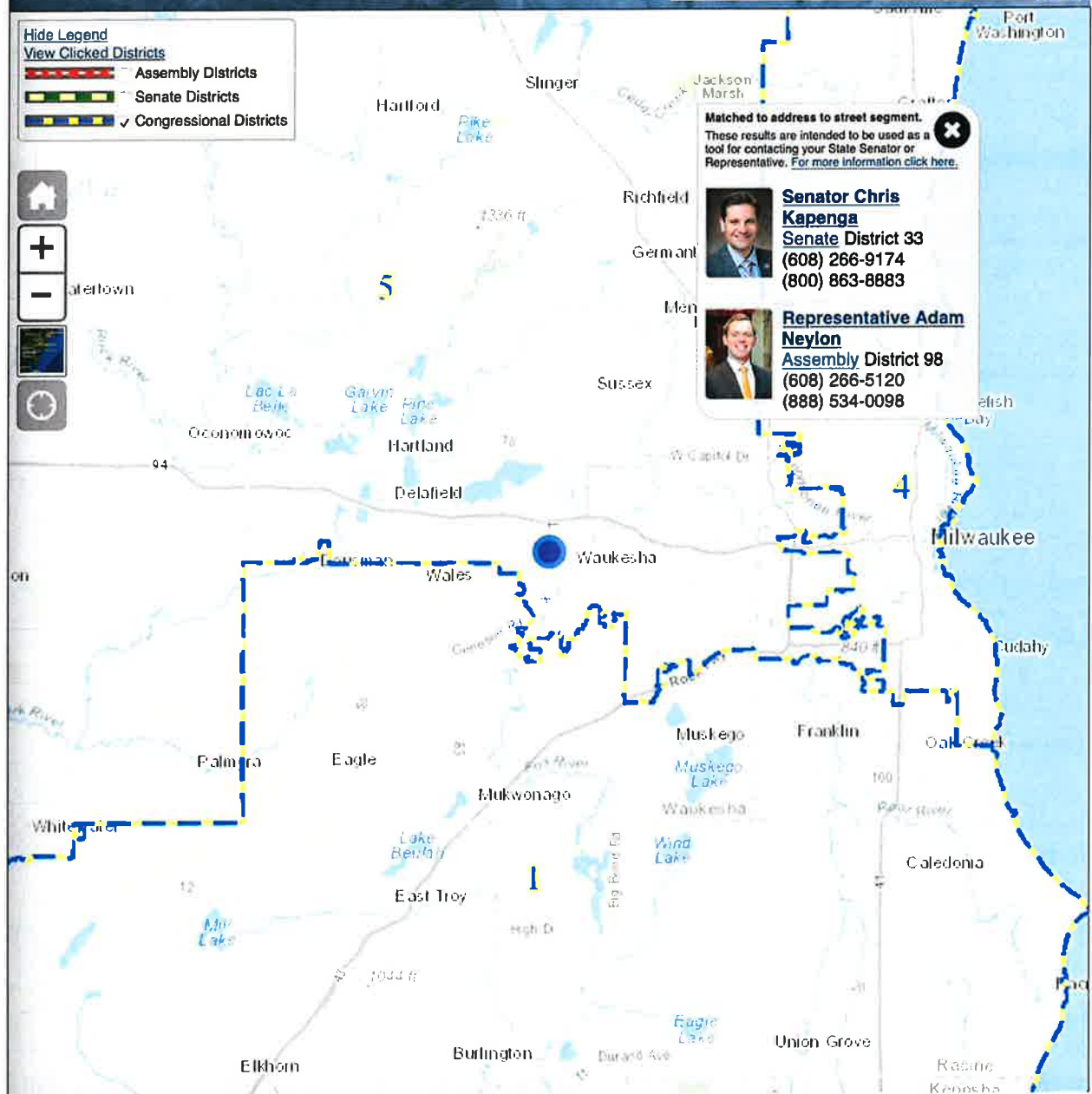
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(800) 863-8883



Representative Adam Neylon
Assembly District 98
(608) 266-5120
(888) 534-0098



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**Senator Tim Carpenter**
Senate District 3
(608) 266-8535

**Representative Daniel Riemer**
Assembly District 7
(608) 266-1733
(888) 529-0007

