

The Complaint of

REPUBLICAN PARTY OF WISCONSIN
MARK MORGAN,

Complainant,

Against

DAVID S. GRONIK JR.,

Respondent.

VERIFIED
COMPLAINT

Republican Party of Wisconsin, by and through its representative, Mark Morgan (“Complainant”), brings this complaint against David S. Gronik (“Gronik”) and alleges as follows:

1. Complainant Mark Morgan is a qualified elector of the State of Wisconsin and is the Executive Director of the Republican Party of Wisconsin with a mailing address of 148 East Johnson Street, Madison, WI 53703.
2. David Gronik is a declared candidate for Governor of Wisconsin with a mailing address of 7124 N Beach Drive., Fox Point, WI 53217.
3. That on May 31, 2018, Gronik submitted nomination papers to the Wisconsin Elections Commission in order to secure a place on the ballot in the upcoming election for Governor.
4. That of the total number of signatures submitted by Gronik, the Wisconsin Elections Commission made an initial ruling of 3,602 valid signatures.
5. That Wis. Stat. §8.15(6)(a) requires candidates for Governor submit not less than 2,000 valid signatures in order to be nominated for placement on the ballot.

COUNT 1: Noncompliance with Wis. Stat. §8.15(4)

6. All preceding paragraphs are re-alleged and incorporated as if fully stated herein.
7. Wis. Stat. §8.15(4)(a) requires each nomination paper circulator to state and certify “that he or she, the circulator, is a qualified elector of this state, or if not a qualified elector of this state, is a U.S. Citizen age 18 or older, who if he or she were a resident of this state, would not be disqualified from voting under §6.03.”

8. Wis. Stat. §6.03 disqualifies any person convicted of a felony from voting in Wisconsin elections.
9. That Patricia Lacy, residing at 4435 W 100th St., Milwaukee, WI 53225, circulated and certified the following nomination pages for Gronik: 27, 97, 98, 162, 163, 164, 165, 198, 199, 238, 246, 247, 248, 249, 250, 266, 268, 269, 270, 285, 289, 294, 311. In total, Patricia Lacy collected 203 signatures for Gronik's nomination.
10. Upon information and belief, the same Patricia Lacy was found guilty of a class H Felony for Forgery-Uttering on October 8, 2012 in Milwaukee County Circuit Court. (*See State of Wisconsin v. Patricia Ann Lacy*, Milwaukee County Case Number 2012CF003744).
11. Upon information and belief, the same Patricia Lacy was found guilty of a class H felony for child abuse and intentionally causing harm to a child on August 8, 2003 in Milwaukee County Circuit Court. (*See State of Wisconsin v. Patricia A. Lacy*, Milwaukee County Case Number 2003CF002068).
12. Upon information and belief, Patricia Lacy is disqualified from voting under Wis. Stat. §6.03 as a result of her felony conviction and is therefore not qualified to circulate nomination papers under Wis. Stat. §8.15.
13. Upon information and belief, all nomination papers and their corresponding signatures circulated by Patricia Lacy are therefore invalid.

COUNT 2: Noncompliance with Wis. Stat. §8.15(4)

14. All preceding paragraphs are re-alleged and incorporated as if fully stated herein.
15. That Torre Johnson, residing at 2955 N 17th St., Milwaukee, WI 53206, circulated and certified the following nomination pages for Gronik: 24, 30, 31, 32, 33, 34, 35, 37, 38, 39, 44, 46, 47, 55, 58, 229, 232, 234, 235, 236, 252, 257, 258, 267, 276, 279, 281, 282, 284, 287, 295, 296. In total, Torre Johnson collected 295 signatures for Gronik's nomination.
16. Upon information and belief, the same Torre Johnson was found guilty of a class I felony for possession of cocaine on October 6, 2015 in Milwaukee County Circuit Court. (*See State of Wisconsin v. Torre Marvell Johnson*, Milwaukee Case Number 2005CF003019).
17. Upon information and belief, Torre Johnson is disqualified from voting under Wis. Stat. §6.03 as a result of his felony conviction and is therefore not qualified to circulate nomination papers under Wis. Stat. §8.15.
18. Upon information and belief, all nomination papers and their corresponding signatures circulated by Torre Johnson are therefore invalid.

COUNT 3: Noncompliance with Wis. Stat. §8.15(4)

19. All preceding paragraphs are re-alleged and incorporated as if fully stated herein.
20. Wis. Stat. §8.15(4)(a) states “the certification of a qualified circulator stating his or her residence...shall appear at the bottom of each nomination paper.”
21. Upon information and belief, the following nomination pages are invalid because the circulator did not fully indicate the municipality of his or her residential address as required under Wis. Stat. §8.15(4)(a): See Attachment A. In total, these pages contain 1566 signatures.

COUNT 4: Noncompliance with Wis. Stat. §8.15(2)

22. All preceding paragraphs are re-alleged and incorporated as if fully stated herein.
23. Wis. Stat. §8.15(2) requires that, in order for a nomination signature to be valid, each signer of a nomination paper “shall list his or her municipality of residence for voting purposes, the street and number, if any, on which the signer resides, and the date of signing.”
24. Upon information and belief, the following nomination pages are invalid or partially invalid because the circulator of the nomination paper and not the actual signer of the nomination paper listed the municipality of the signer: See Attachment B. In total, these pages contain 472 invalid signatures.

COUNT 5: Noncompliance with Wis. Stat. §8.15(4)

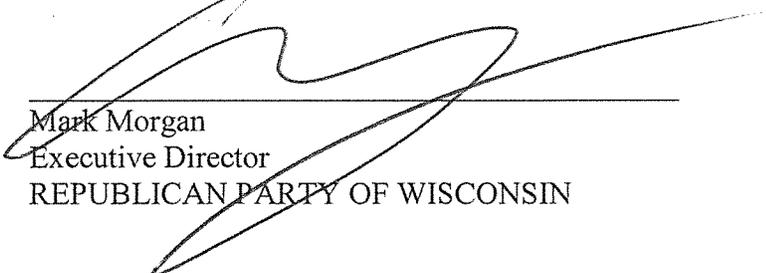
25. All preceding paragraphs are re-alleged and incorporates as if fully stated herein.
26. Wis. Stat. §8.15(4)(a) states “The certification of a qualified circulator...shall appear at the bottom of each nomination paper, stating he or she personally circulated the nomination paper and personally obtained each of the signatures.”
27. That Keith Pettis, residing at 3207 N 36th St., Milwaukee, WI 53216, circulated and certified the following nomination pages for Gronik: 260, 43, 260, 188, 184, 189, and one other page with an unidentifiable page number. These nomination pages, circulated by Pettis between May 10th – May 25th, contain 58 signatures.
28. That on May 8, 2018 a bench warrant was issued for the arrest of Keith Pettis, residing at 3207 N 36th St., Milwaukee, WI 53216, by the Milwaukee County Circuit Court for misdemeanor disorderly conduct, misdemeanor use of a dangerous weapon, and operating a firearm while intoxicated. (*See State of Wisconsin v. Keith Allen Pettis*, Milwaukee County Case Number 2018CM000589).

29. Upon information and belief, there is reason to question whether it was Keith Pettis who personally circulated the above referenced nomination pages, as Pettis was evading the detection of law enforcement at the same time he was allegedly circulating nomination papers.
30. Upon information and belief, the above referenced nomination pages and all signatures contained within are invalid if they were not in fact personally circulated and certified by Keith Pettis.

The above-referenced activity is sufficient to establish probable cause that Gronik's nomination papers contain more than 1770 signatures which are noncompliant with Wis. Stat. §8.15.

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

Dated this 4th day of June 2018, at Madison, Wisconsin.



Mark Morgan
Executive Director
REPUBLICAN PARTY OF WISCONSIN

Attachment A.

Page Number	Number of Signatures								
6	10	67	10	140	10	198	10	257	9
10	10	68	10	141	10	199	7	258	9
17	10	71	10	142	10	200	10	259	9
18	7	72	10	143	10	201	7	260	9
21	8	73	10	144	10	203	10	261	9
22	6	77	10	145	10	205	10	262	9
23	10	78	10	150	10	206	10	266	9
24	7	80	10	151	10	207	10	267	9
27	9	81	10	152	10	208	10	268	9
28	10	82	10	154	10	209	10	269	9
30	10	83	10	155	10	210	10	270	9
31	10	84	10	156	10	211	10	271	9
32	7	88	10	157	10	214	9	274	9
33	10	89	10	158	10	220	10	276	8
34	10	90	10	159	10	222	10	279	8
35	10	91	10	160	10	224	10	281	7
37	10	92	10	162	10	231	10	282	7
38	8	93	10	163	10	232	6	284	7
39	9	94	10	164	10	233	10	285	7
43	10	95	10	165	10	234	10	287	3
44	10	96	10	166	10	235	10	288	6
46	5	97	9	167	10	236	9	289	6
48	10	98	10	168	10	237	10	294	5
49	10	99	10	173	10	238	10	295	4
52	10	100	9	174	10	239	10	296	5
53	10	123	7	176	10	241	9	297	4
55	10	125	10	177	10	242	10	304	3
58	10	127	10	181	10	246	10	311	6
59	10	130	10	183	10	247	10	475	4
60	10	131	10	184	10	248	7	724	5
61	10	132	10	188	10	249	10		

63	10	134	10	189	10	250	10
64	10	135	10	191	10	252	10
65	10	136	10	194	10	253	10
66	10	137	10	197	10	256	9

Attachment B.

Page	Line																		
18	3	64	5	92	2	131	3	164	2	194	8	232	7	248	5	269	4	285	7
18	4	64	9	92	3	131	4	164	3	194	9	233	5	248	6	269	5	285	8
18	5	64	10	93	1	131	5	164	4	197	1	233	6	249	1	269	6	288	5
18	8	65	1	93	2	132	1	164	5	197	2	233	7	249	2	269	7	288	6
18	9	65	2	93	4	132	2	164	6	197	3	233	8	249	3	269	8	289	1
21	7	65	7	93	5	132	8	164	7	197	4	237	1	249	4	269	9	289	1
21	8	65	8	93	6	134	1	164	8	197	5	237	2	249	5	269	10	289	2
22	3	65	9	93	7	134	2	164	9	197	6	237	3	249	6	270	1	289	3
22	4	65	10	93	8	134	3	164	10	198	1	237	4	249	7	270	2	289	4
22	5	66	1	97	1	134	4	165	1	198	2	237	5	249	8	270	3	289	5
22	6	66	2	97	2	135	1	165	2	198	3	237	6	249	9	270	4	289	6
22	9	66	3	97	3	135	2	165	3	198	4	237	7	249	10	270	5	291	1
23	1	66	4	97	4	136	3	165	4	198	5	238	1	250	1	270	6	291	2
23	2	67	4	97	5	136	4	165	5	198	6	238	2	250	2	270	7	291	3
23	7	67	5	97	6	136	5	165	6	198	7	238	3	250	3	270	8	291	4
23	8	68	3	97	7	136	6	165	7	198	8	238	4	250	4	270	9	291	5
27	2	68	4	97	8	136	7	174	1	198	9	238	5	250	5	270	10	291	6
27	3	68	5	97	9	136	8	174	2	198	10	238	6	250	6	272	2	294	1
27	4	68	6	97	10	143	9	176	6	199	4	238	7	250	7	272	3	294	2
27	5	68	7	98	1	143	10	176	7	199	5	238	8	250	8	274	1	311	1
27	6	71	1	98	2	145	9	183	1	199	6	238	9	250	10	274	1	311	2
27	7	71	2	98	3	145	10	183	2	199	7	238	10	252	7	274	2	311	4
27	8	71	3	98	4	154	5	183	3	199	8	239	1	252	8	274	2		
27	9	77	1	98	5	154	6	183	4	199	9	239	2	252	9	274	3		
27	10	77	2	98	6	159	3	183	5	200	2	239	5	253	9	278	1		
30	4	77	6	98	7	159	4	183	6	200	3	239	6	253	10	278	2		
30	5	77	7	98	8	160	1	184	1	200	4	239	7	266	1	278	3		
43	8	78	7	98	9	160	2	184	2	205	1	239	8	266	2	278	4		
43	9	78	8	98	10	160	3	184	3	205	2	239	9	266	3	278	5		
43	10	78	9	100	7	160	4	184	4	205	3	241	1	266	4	278	6		
44	3	78	10	100	8	160	5	184	5	205	4	241	2	266	5	278	9		

44	4	80	1	123	1	160	6	184	6	205	5	241	3	266	6	278	10
59	3	80	2	123	2	160	7	184	7	205	6	241	4	266	7	282	1
59	4	80	3	123	3	160	8	184	8	205	7	241	5	266	8	282	2
59	6	81	1	123	4	160	9	184	9	205	8	241	6	266	9	282	3
59	7	81	2	123	5	160	10	184	10	205	9	241	7	267	3	282	4
59	9	81	3	123	6	162	1	188	1	205	10	241	8	267	6	282	5
59	10	81	4	123	7	162	2	188	2	211	8	241	9	267	7	282	6
60	1	81	5	125	1	162	3	188	3	211	9	241	10	267	8	282	7
60	2	81	6	125	2	162	4	188	4	222	4	246	1	268	1	283	1
61	6	83	4	125	3	162	5	188	5	222	5	246	2	268	2	283	2
61	7	83	5	125	4	162	6	188	6	222	6	246	3	268	3	283	3
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61	10	83	8	130	3	162	9	188	9	231	3	246	6	268	7	283	6
63	4	83	10	130	7	162	10	188	10	232	2	246	7	268	8	285	1
63	5	89	1	130	8	163	1	189	9	232	3	248	1	268	9	285	2
63	6	89	2	130	9	163	2	189	10	232	4	248	2	268	10	285	3
64	3	91	7	131	1	163	3	191	4	232	5	248	3	269	1	285	4
64	4	91	8	131	2	164	1	191	10	232	6	248	4	269	2	285	5