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WISCONSIN GOVERNMENT ACCOUNTABILITY BOARD  
WISCONSIN JUDICIAL COMMISSION

COMPLAINT  
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3-25-08  
[Signature]

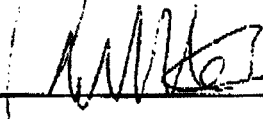
**COMPLAINT AGAINST FRIENDS OF LOUIS B. BUTLER AND LOUIS B. BUTLER  
FOR THE ILLEGAL USE OF CORPORATE RESOURCES FOR CAMPAIGN  
PURPOSES AND FOR VIOLATIONS OF THE JUDICIAL CODE OF ETHICS**

I, Robert Dohnal, submit the following complaint against Friends of Louis B. Butler, Louis B. Butler, and any predecessor committee that also engaged in the use of corporate resources for campaign purposes:

1. I am an adult citizen of the State of Wisconsin with permanent residency at 11824 West Potter Road, Wauwatosa, Wisconsin 53226.
2. Louis B. Butler is a candidate for state office in Wisconsin, and operates a committee registered with the Government Accountability Board ("GAB"). The Committee is named "Friends of Supreme Court Louis B. Butler", and is identified as WSEB ID No. 102437. This committee is referred to hereafter as "Friends of Butler."
3. Over a period of several years, Friends of Butler listed its mailing address in submissions to the Elections Board as 330 E. Kilbourn Avenue, Suite 1250. Attached as Exhibit A are various filings of Friends of Butler.
4. Friebert, Finerty & St. John is a service corporation organized under Subchapter XIX of Wisconsin Statutes Chapter 180. According to its registration at the Department of Financial Institutions, the corporate address for Friebert, Finerty & St. John is 330 E. Kilbourn Avenue, Suite 1250.
5. Friends of Butler received contributions via U.S. Mail at 330 E. Kilbourn Avenue, Suite 1250. Attached as Exhibit B are various letters transmitting contributions.
6. Friends of Butler submitted campaign finance reports under the cover letter of Friebert, Finerty & St. John letterhead. Attached as Exhibit C is one such letter.
7. Friends of Butler submitted campaign finance reports under the signature of Sandra Wakefield. Upon information and belief, Sandra Wakefield was an employee of Friebert, Finerty & St. John at the time she submitted the campaign reports on corporate letterhead.
8. Pursuant Wis. Stat. § 11.38(1), no corporation may make any contribution or disbursement, directly or indirectly, to any candidate.
9. There is no *de minimus*, or any other exception, to Wis. Stat. § 11.38(1).
10. Friends of Butler utilized corporate resources over a period of many years for at least the following purposes: receiving contributions, preparing campaign finance reports, submitting campaign finance reports, and as a designated campaign headquarters.

- 11. There is no record in the campaign finance reports of any payment from Friends of Butler to the corporation for these services and benefits over these many years. The first record of any payment is a payment made in 2008.
- 12. Friends of Butler achieved significant pecuniary gain through the use of these corporate assets, including the use of corporate staff in receiving, opening, routing, and other necessary handling of campaign contributions, use of corporate office supplies, such as letterhead, in preparation and submission of campaign finance documents, use of corporate staff in processing and sending campaign finance reports, avoidance of expenses in maintaining a campaign headquarters or post office box for such purposes, and avoidance of the staff and other costs for duties fulfilled by corporate employees.
- 13. During the same period of time that corporate assets were illegally utilized to support Friends of Butler, representatives of the corporation making the contributions and disbursements routinely appeared before Justice Butler on matters before the Wisconsin Supreme Court. Justice Butler did not recuse himself, choosing to participate in matters where the corporation appearing was also housing his campaign headquarters, preparing his campaign finance reports, and receiving his campaign contributions. Attached as Exhibit D is a partial list of such matters.
- 14. Justice Butler violated the judicial code of ethics, specifically, but not limited to, SCR 60.02 and 60.03, in hearing matters presented by the corporation that was also illegally providing pecuniary benefit to his campaign.

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

  
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State of Wisconsin County of Milwaukee

Subscribed and sworn to before this 25th day of March, 2008

Signature of Notary Public

  
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March 11, 2012  
Date Commission Expires

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