

State of Wisconsin  
Before the Wisconsin Elections Commission

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The Complaint of Jenny Toftness, Executive Director,  
Republican Assembly Campaign Committee,  
Complainant,

MEC 04JUN2018 PM02:12

Against

Charisse Daniels,

Respondent.

MEC 04JUN2018 PM02:12

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Verified Complaint and Request for Enforcement

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I, Jennifer Toftness, on behalf of Republican Assembly Campaign Committee, based on information and belief, hereby state as follows:

1. I am a resident of the State of Wisconsin, a qualified elector, and the Executive Director of the Republican Assembly Campaign Committee with a mailing address of 148 East Johnson Street, Madison, Wisconsin 53703.
2. Respondent Charisse Daniels, Candidate ID No. 0106060, who listed her address at 1510 Utah Street, Watertown, WI 53094, filed nomination papers with the Ethics Commission for certification as a candidate representing the Democratic Party in the general election for the 37th Assembly District to be held on November 6, 2018.
3. On June 1, 2018, Respondent Daniels submitted 30 or 31 pages of nomination signatures. The Wisconsin Elections Commission staff determined that Respondent submitted 201 valid signatures.
4. Complainant asserts that Respondent submitted an insufficient number of nomination paper signatures and should be precluded from being placed on the ballot because 43 signatures were fraudulently or improperly submitted. The following signatures should not be counted:

See "Exhibit 1"

5. Fifteen signatures that were fraudulently signed or forged, for which Complainant has provided Affidavits from the individuals whose names were forged. ("Exhibits 2-16")

6. Twenty-five signatures that were included on the same sheets for which affidavits were provided in Exhibits 2-16, but for which Complainant was unable to obtain signed affidavits. Including one address which is a vacant lot. (See "Exhibit 17")
7. Three signatures for individuals who signed the nominations papers twice.
8. A total of at least 43 signatures are not valid and should not be counted toward Respondent's total.
9. Additionally, Respondent requests the Commission conduct an investigation for election fraud in violation of Wis. Stat. § 12.13(3)(a) and take any civil or criminal enforcement actions necessary, pursuant to Wis. Stat. § 5.05(2m), including a referral to the appropriate law enforcement agency.

**Part 1 - Respondent Submitted Four Pages of Falsified Signatures**

10. Respondent personally circulated and signed 10 pages of nomination papers (Page numbers: 5, 7, 8, 11, 14, 16, 18, 22, 27, 31). By signing the nomination papers as circulator, Respondent certified that:

"I further certify that 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 personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know the signers are electors of the jurisdiction or district that the candidate seeks to represent. I know that each person signed the paper with full knowledge of its content on the date indicated opposite his or her name. I know their respective residences given. I intend to support this candidate. I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a)."

11. Complainant has attached affidavits from 15 individuals who deny signing Respondent's nomination papers, despite their signatures being submitted by Respondent. (Exhibits 2-16). These 15 signatures were fraudulently submitted and must be stricken.

Name	Page and Line Number	Circulator	Exhibit Number
Andrea Schultz	Page 11, Line 5	Charisse Daniels	2

Anthony Scola	Page 8, Line 3	Charisse Daniels	3
Carolyn Demetropoulos	Page 5, Line 5	Charisse Daniels	4
Christopher Demetropoulos	Page 5, Line 6	Charisse Daniels	5
David Block	Page 11, Line 1	Charisse Daniels	6
Daniel Sullivan	Page 5, Line 1	Charisse Daniels	7
Diane Tuhy	Page 8, Line 9	Charisse Daniels	8
Fred Jandt	Page 5, Line 4	Charisse Daniels	9
Jessica Jandt	Page 5, Line 3	Charisse Daniels	10
Kaye Piotrowski	Page 8, Line 2	Charisse Daniels	11
Margaret Scola	Page 8, Line 4	Charisse Daniels	12
Patrice Walter	Page 11, Line 2	Charisse Daniels	13
Toni Castellion	Page 11, Line 10	Charisse Daniels	14
Tarasa Lown	Page 14, Line 10	Charisse Daniels	15
Dianna Stai	Page 5, Line 10	Charisse Daniels	16

12. In addition, Complainant has provided an affidavit from Rep. John Jagler (“Exhibit 17”), who upon review of the nomination signatures submitted by Respondent to the Commission, attempted to contact the individuals whose names appear on pages 5, 8, 11, and 14.

13. In his affidavit, Rep. Jagler establishes that, he personally made contact with 28 individuals whose names or addresses appear on pages 5, 8, 11, and 14.

14. Fifteen of those 30 individuals signed an affidavit denying that said individual signed nomination papers for Charisse Daniels. Seven other individuals denied signing the nomination papers, but declined to sign an affidavit. An additional five individuals denied signing the nomination papers of Charisse Daniels and would attest to that fact,

but they were unable to complete an affidavit before the time of this filing. These facts are sworn to by Rep. Jagler as stated in his affidavit (“Exhibit 17”).

15. Rep. Jagler was informed by the individual at 804 East Cady St, Watertown WI 53094 (page 14, line 6), Mr. Randall Buss, that he had not signed the nomination papers. The occupants of the residence also stated to Rep. Jagler that the individual listed on page 14, line 7, as living in the same house as Mr. Buss, does not in fact live there. (“Exhibit 17”)
16. Rep. Jagler was also advised by the individual residing at the residence at 1128 Jones Street, Watertown, WI 53094 (Page 11, Line 3), that the purported signature belonged to a landlord who does not reside at that address and was actually in Hawaii on the date he purportedly signed Ms. Daniels’ nomination paper.
17. The address of 530 Brookstone Way, Watertown, WI 53094 is listed as a residence of a signer is in fact a vacant lot that does not contain a residence. (Page 11, Line 6) (“Exhibit 18”)
18. In addition to striking the 15 signatures identified in Exhibits 2-16, the Commission should also strike the 25 other signatures included on pages 5, 8, 11, and 14 for being fraudulent or invalid signatures.

**Part 2 - Respondent submitted 3 Duplicate Signatures**

19. Respondent submitted 3 sets of duplicate signatures from the individuals identified below. Pursuant to Wis. Admin. Code EL 2.07(3)(b), these three duplicate signatures should be stricken.

<b><u>Name</u></b>	<b><u>Page and Line Number</u></b>	<b><u>Address Provided</u></b>	<b><u>Date Signed</u></b>
Leon Buescher	Page 7, Line 9	N1567 Walton Road, Watertown	5/12/18
Leon Buescher	Page 10, Line 5	N1567 Walton Road, Watertown	5/12/18

Michael Clark	Page 15, Line 3	230 N. Ludington Street, Columbus	5/10/18
Michael Clark	Page 20, Line 2	230 N. Ludington Street, Columbus	3/18/18*
Karen Edson	Page 2, Line 9	3953 Finch Trail, Windsor	5/21/18
Karen Edson	Page 4, Line 7	3953 Finch Trail, Windsor	5/14/18

\* This signature could also be stricken for providing an improper date.

**Request for Sanctions and Referral to Law Enforcement**

20. Given the factual allegations contained herein, I request Elections Commission conduct an investigation for election fraud and violations of Wis. Stat. 12.13(3)(a) or any other relevant violations under Wisconsin law; and provide any sanctions, penalties, fines, or other relief appropriate; and refer this matter to the appropriate law enforcement agency for criminal investigation.

Accordingly, based on the Elections Commission's authority under EL 2.07, Wis. Admin Code, I request the Commission strike the 43 signatures identified above from the 201 signatures preliminarily accepted by Elections Commission staff.

4/4/2018  
Date

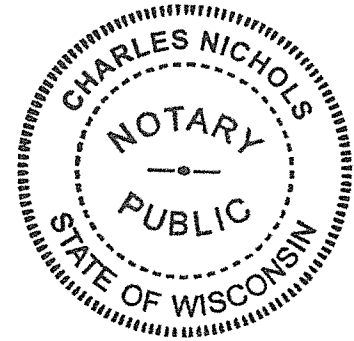
Jennifer A. Softness  
Complainant's Signature

148 E. Johnson St.  
Address

Madison WI 53703  
Address

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

STATE OF WISCONSIN    )  
                                  )        ss  
COUNTY OF DANE        )



Sworn to before me this 4 day of June, 2018

*Charles Nichols*

Notary Public

My Commision expires \_\_\_\_\_, or is permanent.