

State of Wisconsin  
Before the Wisconsin Elections Commission

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

Against

Charisse Daniels,  
Respondent.

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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

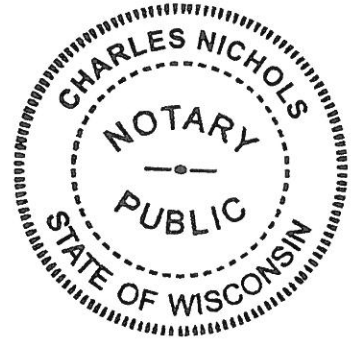
Jennifer A Softness  
Complainant’s Signature

148 E. Johnson St.  
Address

Madison WI 53703  
Address

I, Jennifer Totness, 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



Notary Public

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

# Exhibit 1

Name	Page Number, Line Number	Circulator	Address
Daniel Sullivan	Page 5, Line 1	Charisse Daniels	821 Briar Ct
Penelope Sullivan	Page 5, Line 2	Charisse Daniels	821 Briar Ct
Jessica Jandt	Page 5, Line 3	Charisse Daniels	869 Briar Ct
Fred Jandt	Page 5, Line 4	Charisse Daniels	869 Briar Ct
Carolyn Demetropoulos	Page 5, Line 5	Charisse Daniels	871 Briar Ct
Christopher Demetropoulos	Page 5, Line 6	Charisse Daniels	871 Briar Ct
Florence Gordon	Page 5, Line 7	Charisse Daniels	808 Briar Ct
Rudolph Voight	Page 5, Line 8	Charisse Daniels	868 Briar Ct
Mardeen Voight	Page 5, Line 9	Charisse Daniels	868 Briar Ct
Dianna Stai	Page 5, Line 10	Charisse Daniels	805 Cheyenne Cir
Franklin Hrascky	Page 8, Line 1	Charisse Daniels	206 Dewey Ave
Kaye Piotrowski	Page 8, Line 2	Charisse Daniels	206 Dewey Ave Apt 1/2
Anthony Scola	Page 8, Line 3	Charisse Daniels	212 Dewey Ave
Margaret Scola	Page 8, Line 4	Charisse Daniels	212 Dewey Ave
Sandra Arnis	Page 8, Line 5	Charisse Daniels	306 Dewey Ave
Robert Arnis	Page 8, Line 6	Charisse Daniels	306 Dewey Ave
Tami Bahn	Page 8, Line 7	Charisse Daniels	508 Dewey Ave
Chris Bahn	Page 8, Line 8	Charisse Daniels	508 Dewey Ave
Diane Tuhy	Page 8, Line 9	Charisse Daniels	701 E Division St
Bruce Wagner	Page 8, Line 10	Charisse Daniels	821 E Division St
David Block	Page 11, Line 1	Charisse Daniels	1108 Jones St
Patrice Walter	Page 11, Line 2	Charisse Daniels	1112 Jones St
Nathan Schultz	Page 11, Line 3	Charisse Daniels	1128 Jones St
Jim Schultz	Page 11, Line 4	Charisse Daniels	1130 Jones St
Andrea Schultz	Page 11, Line 5	Charisse Daniels	1130 Jones St
Cathy Peterson	Page 11, Line 6	Charisse Daniels	530 Brookstone Way
Lance Zimmerman	Page 11, Line 7	Charisse Daniels	637 Brookstone Way
Tracy Zimmerman	Page 11, Line 8	Charisse Daniels	637 Brookstone Way
Nevanka Petanis	Page 11, Line 9	Charisse Daniels	705 Brookstone Way
Toni Carnillin	Page 11, Line 10	Charisse Daniels	207 Concord Ave
Susan Kubly	Page 14, Line 1	Charisse Daniels	916 Reinhold St

Melody Joyce	Page 14, Line 2	Charisse Daniels	821 E Cady St
Amanda Graves	Page 14, Line 3	Charisse Daniels	821 E Cady St
James Joyce	Page 14, Line 4	Charisse Daniels	821 E Cady St
Betty Zimmerman	Page 14, Line 5	Charisse Daniels	614 E Cady St
Randall Buss	Page 14, Line 6	Charisse Daniels	804 E Cady St
Amy Bauzisine	Page 14, Line 7	Charisse Daniels	804 E Cady St
Noah Schultz	Page 14, Line 8	Charisse Daniels	624 Cole St
Bridget Britski	Page 14, Line 9	Charisse Daniels	624 Cole St
Tara Lown	Page 14, Line 10	Charisse Daniels	822 Cole St
Leon Buescher	Page 7, Line 10; Page 10, Line 5	Charisse Daniels, Kevin Koppilin	N1567 Walton Road, Watertown
Michael Clark	Page 15, Line 3; Page 20, Line 2	Martha Rule, Mary Arnold	230 N Ludington St, Columbus
Karen Edson	Page 2, Line 9; Page 4, Line 7	Abigal Lowery, Kevin Koppilin	3953 Finch Trail, Windsor

# Exhibit 2

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, Andrew Schultz (Name), residing at  
1130 Jones St (address)  
being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5/21/18 (date), nor did I sign the nomination papers on any other date.

I, Andrew Schultz (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Andrew Schultz  
Name

State of Wisconsin )  
) SS  
County of Dodge AS

Sworn to before me this 2<sup>nd</sup> day of June, 2018.

Katherine M. Bates  
Notary Public or Person Authorized  
to Administer Oaths

KATHERINE M BATES  
Notary Public  
State of Wisconsin

KATHERINE M BATES  
Notary Public  
State of Wisconsin

My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 3

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, Anthony Scola (Name), residing at  
212 Dewey Ave - Wttm, WI 53094 (address)  
 being first duly sworn, state as follows:

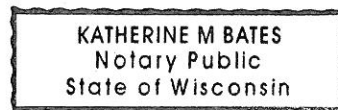
I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 2-20-18 (date), nor did I sign the nomination papers on any other date.

I, Anthony Scola (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Anthony Scola  
 Name

State of Wisconsin )  
 ) ss  
~~County of Dodge~~ )

Sworn to before me this 3<sup>rd</sup> day of June, 2018.



Katherine M. Bates  
 Notary Public or Person Authorized  
 to Administer Oaths

My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.

STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, CAROLYN Kay DEMETROPOULOS (Name), residing at 871 BRIAR Ct. (address)

being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-15-18 (date), nor did I sign the nomination papers on any other date.

I, Carolyn Demetropoulos (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Carolyn K. DEMETROPOULOS  
Name

State of Wisconsin )  
County of Dodge <sup>CD</sup> ) ss

Sworn to before me this 2 day of June, 2018.

Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths

KATHERINE M BATES  
Notary Public  
State of Wisconsin

My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 5

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

CHRISTOPHER D.  
 I, DEMETROPOULOS (Name), residing at  
871 BRIAR CT (address)

being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5.15.18 (date), nor did I sign the nomination papers on any other date.

I, CHRISTOPHER DEMETROPOULOS (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Christopher D. Demetropoulos  
 Name

State of Wisconsin )  
 ) ss  
 County of Dodge )

Sworn to before me this 2nd day of June, 2018.

Katherine M Bates  
 Notary Public or Person Authorized  
 to Administer Oaths

KATHERINE M BATES Notary Public State of Wisconsin
--

My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.



STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, DAVID BLOCK (Name), residing at  
1108 JONES ST, WATERTOWN, WI (address)

being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 05-21-2018 (date), nor did I sign the nomination papers on any other date.

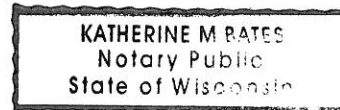
I, DAVID J. BLOCK (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

David J Block  
Name

State of Wisconsin )  
Dgd ) ss  
County of ~~Dodge~~ )

Sworn to before me this 2 day of June, 2018.

Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths



My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 7

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, Daniel Sullivan (Name), residing at  
821 BRIAR CT. Watertown, WI (address)  
 being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5/15/18 (date), nor did I sign the nomination papers on any other date.

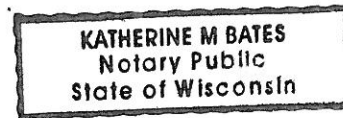
I, Daniel Sullivan (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Dan R Sullivan  
 Name

State of Wisconsin )  
 ) ss  
 County of Dodge P.S.)

Sworn to before me this 2nd day of June, 2018.

Katherine M Bates  
 Notary Public or Person Authorized  
 to Administer Oaths



My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.

# Exhibit 8

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

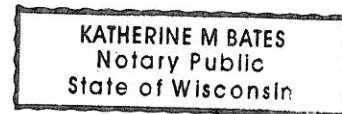
I, DIANE TUHY (Name), residing at  
701 E. DIVISION ST. WATERTOWN WI 53094 (address)  
 being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-20-18 (date), nor did I sign the nomination papers on any other date.

I, DIANE C. TUHY (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Diane C. Tuhy  
 Name

State of Wisconsin    )  
                                   ) ss  
 County of Dodge     )



Sworn to before me this 3<sup>rd</sup> day of June, 2018.

Katherine M Bates  
 Notary Public or Person Authorized  
 to Administer Oaths

My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.

# Exhibit 9

STATE OF WISCONSIN

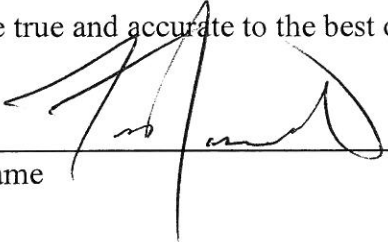
COUNTY OF JEFFERSON

## AFFIDAVIT

I, Fred Landt (Name), residing at  
809 Briar Court, Watertown, WI 53094 (address)  
 being first duly sworn, state as follows:

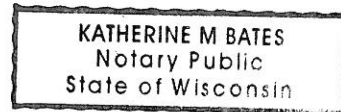
I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-15-18 (date), nor did I sign the nomination papers on any other date.

I, Fred Landt (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

  
 \_\_\_\_\_  
 Name

State of Wisconsin )  
 ) ss  
 County of Dodge )

Sworn to before me this 3 day of June, 2018.



Katherine M Bates  
 Notary Public or Person Authorized  
 to Administer Oaths

My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.

Exhibit 10

STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, Jessica Jandt (Name), residing at 869 Briar Court (address)

being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-15-18 (date), nor did I sign the nomination papers on any other date.

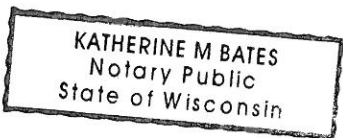
I, JESSICA JANDT (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Jessica Jandt  
Name

State of Wisconsin )  
  ) ss  
County of Dodge     )

Sworn to before me this 3<sup>rd</sup> day of June, 2018.

Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths



My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 11

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, KAYE PIOTROWSKI (Name), residing at  
200 1/2 Dewey Ave (address)

being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5/20/18 (date), nor did I sign the nomination papers on any other date.

I, KATIE PIOTROWSKI (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Kaye Piotrowski  
Name

State of Wisconsin )  
County of Dodge Wf. ) SS

Sworn to before me this 2nd day of June, 2018.

KATHERINE M BATES  
Notary Public  
State of Wisconsin

Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths

My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, Margaret Scola (Name), residing at 202 Dewey Ave. (address) being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-20-18 (date), nor did I sign the nomination papers on any other date.

I, Margaret Scola (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Margaret M. Scola  
Name

State of Wisconsin )  
                                      ) ss  
County of Dodge     )

KATHERINE M BATES  
Notary Public  
State of Wisconsin

Sworn to before me this 3rd day of June, 2018.

Katherine M. Bates  
Notary Public or Person Authorized  
to Administer Oaths

My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 13

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, Patrice Walter (Name), residing at  
1112 Jones St. Watertown, WI (address)  
being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5/21 (date), nor did I sign the nomination papers on any other date.

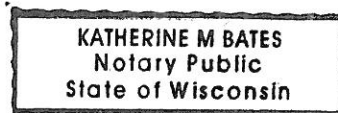
I, Patrice Walter (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Patrice Walter  
Name

State of Wisconsin )  
~~County of Dodge~~ )<sup>pw</sup> ) ss

Sworn to before me this 2nd day of June, 2018.

Katherine M. Bates  
Notary Public or Person Authorized  
to Administer Oaths



My commission expires 2/2/2019  
Or, \_\_\_ is permanent.



STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, Toni Castellon (Name), residing at  
207 N Concord Ave Watertown, WI (address)  
being first duly sworn, state as follows:

I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-21-18 (date), nor did I sign the nomination papers on any other date.

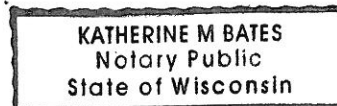
I, Toni Castellon (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Toni M Castellon  
Name

State of Wisconsin    )  
  ) ss  
County of Dodge JE )

Sworn to before me this 2<sup>nd</sup> day of June, 2018.

Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths



My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

STATE OF WISCONSIN

COUNTY OF JEFFERSON

AFFIDAVIT

I, Tarasakawa (Name), residing at 822 Cole St. Watertown, WI 53094 (address)

being first duly sworn, state as follows:

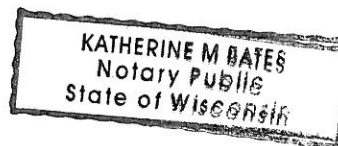
I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-20-18 (date), nor did I sign the nomination papers on any other date.

I, Tarasakawa (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Tarasakawa  
Name

State of Wisconsin )  
) ss  
~~County of Dodge~~ )

Sworn to before me this 3<sup>rd</sup> day of June, 2018.



Katherine M Bates  
Notary Public or Person Authorized  
to Administer Oaths

My commission expires 2/2/2019  
Or, \_\_\_ is permanent.

# Exhibit 16

STATE OF WISCONSIN

COUNTY OF JEFFERSON

## AFFIDAVIT

I, Dianna Stei (Name), residing at  
805 Cheyenne Circle (address)  
 being first duly sworn, state as follows:

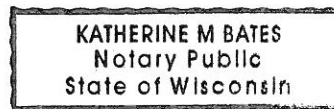
I did not sign the nomination papers for Charisse Daniels, candidate for Representative to the Wisconsin State Assembly on 5-15-18 (date), nor did I sign the nomination papers on any other date.

I Dianna Stei (name), being first duly sworn upon oath and under the penalty of perjury of the law of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

Dianna K Stei  
 Name

State of Wisconsin )  
 ) ss  
~~County of Dodge~~ )

Sworn to before me this 3rd day of June, 2018.



Katherine M Bates  
 Notary Public or Person Authorized  
 to Administer Oaths

My commission expires 2/2/2019  
 Or, \_\_\_ is permanent.

Affidavit of Rep. John Jagler

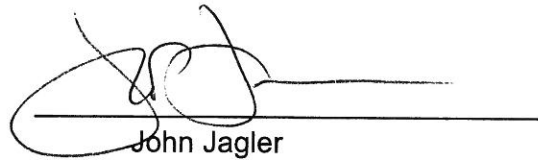
I, John Jagler, residing at 601 Clyman St. Watertown, WI, being first duly sworn, on his oath, states as follows:

- 1) On June 2nd, 2018, I reviewed the nomination papers submitted by Charisse Daniels to appear as a candidate representing the Democratic Party in the general election for the 37th Assembly District.
- 2) I observed the name, address, and purported signature of my friend and supporter David Block, listed on page 11 line 1 of Ms. Daniels' nomination papers. I contacted Mr. Block and he informed me that he had not signed the nomination papers for Ms. Daniels.
- 3) Upon further review of the remainder of Ms. Daniels' signatures I noticed that pages 5, 8, 11, and 14 all contained very similar handwriting.
- 4) On June 2nd and 3rd, I attempted to contact all of the individuals listed on pages 5, 8, 11, and 14 of the nomination papers.
- 5) Fifteen of the people I made contact with stated they did not sign Ms. Daniels' nomination papers and agreed to sign an affidavit stating as much.
- 6) Seven of the people I made contact with told me they did not sign Ms. Daniels' nominations papers, but declined to sign an affidavit.
- 7) Five of the individuals I contacted indicated they did not sign the nomination papers and would attest to that fact, but I did not have a notary available to take a sworn statement at that time.
- 8) One of the addresses (530 Brookstone Way, Watertown) listed next to a signature was a vacant lot which did not contain a residential dwelling. (Page 11, Line 6)
- 9) According to Mr. and Mrs. Buss, who reside at 804 East Cady St appearing on page 14 of the nomination papers, the woman listed on line 7 of page 14 does not reside in that residence.
- 10) Another individual I spoke with stated that she rented from the person listed on the nomination papers but the person's whose signature appears on the nomination paper did not reside there. Furthermore, she stated the person listed in the nomination papers was vacationing in Hawaii on the date he is listed as signing Ms. Daniels' nomination papers. (Page 11, Line 3)
- 11) Mr. and Mrs. Joyce, listed on page 14, told me they did not sign and the woman listed on line 3 of that page, Amanda Grace, does not reside at that address and hasn't lived at that address for over a year.
- 12) In total, I made contact with 28 of the individuals whose names were included on pages 5, 8, 11, and 14 of Ms. Daniels' nomination papers; all of them confirmed to me personally that they did not signed Ms. Daniels' nomination papers. In fact, in my

investigation not a single person I contacted had actually signed Ms. Daniels' nomination papers.

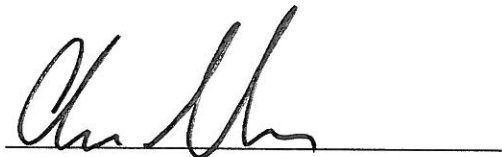
13) My notes and observations from contacting the individuals on pages 5, 8, 11, and 14 are attached; they are a true and accurate reflection of my findings to the best of my knowledge.

I, John Jagler, being first duly sworn upon oath, and under penalty of perjury of the laws of the State of Wisconsin, further state that the above written statements herein are true and accurate to the best of my knowledge.

  
John Jagler

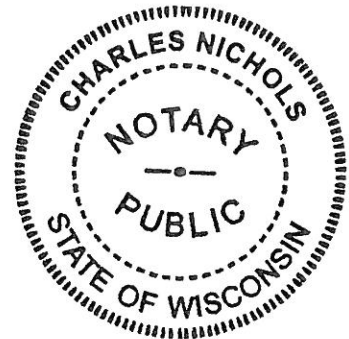
STATE OF WISCONSIN    )  
                                  )    ss  
COUNTY OF DANE     )

Sworn to before me this 4 day of June, 2018

  
\_\_\_\_\_

Notary Public

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





**NOMINATION PAPER FOR PARTISAN OFFICE**  
 I, the undersigned, request the name of  
**CHARISSE DANIELS**  
 Residing at 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held  
 November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the office of  
**REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT**  
 I am eligible to vote in the 37th Assembly District. I have not signed the nomination paper of any other candidates for the same office at this election.

**THE MUNICIPALITY USED FOR MAILING PURPOSES, WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE, IS NOT SUPPORTED BY THE NAME OF THE MUNICIPALITY OF RESIDENCE. MUST ALWAYS BE LISTED.**

SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>(Must address must also include box or lot number)</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>(Indicate town, village or city)</small>	DATE OF SIGNING
1. <i>Doris Sullivan</i>	Doris Sullivan	821 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
2. <i>Pauline Sullivan</i>	Pauline Sullivan	821 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
3. <i>Jessica Grant</i>	Jessica Grant	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
4. <i>Erin Pauline</i>	Erin Pauline	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
5. <i>Christina</i>	Christina	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
6. <i>Christina</i>	Christina	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
7. <i>Christina</i>	Christina	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
8. <i>Robert</i>	Robert	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
9. <i>Robert</i>	Robert	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018
10. <i>Doris</i>	Doris	810 BRICK CT.	WATER TOWN 53094	Water Town	5/15/2018

**CERTIFICATION OF CIRCULATOR**

I, **Charisse Daniels**, certify: I reside at **1510 Utah Street, Watertown, WI 53094**  
 (Circulator's residence including street number and municipality)

E-MAIL ADDRESS	PHONE NUMBER
Affidavit signed	
Did not sign, but wouldn't sign affidavit	
Affidavit signed	
Affidavit signed	
Affidavit Signed	
Did not sign, but wouldn't sign affidavit	
Did not sign, no notary avail	
Did not sign, no notary avail	
Affidavit Signed	

Please include your e-mail address if interested in receiving periodic campaign updates.

I, **Charisse Daniels**, certify: I reside at **1510 Utah Street, Watertown, WI 53094**  
 (Circulator's residence including street number and municipality)

**Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094**  
 Date: **5/15/2018**  
 Signature of Circulator: *Charisse Daniels*  
 T898 NW 5

10



NOMINATION PAPER FOR PARTISAN OFFICE  
 I, the undersigned, request the name of  
**CHARISSE DANIELS**

Residing at 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the office of REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT  
 I am eligible to vote in the 37th Assembly District, I have not signed the nomination paper of any other candidates for the same office at this election.

Please include your e-mail address if interested in receiving periodic campaign updates.

THE MUNICIPALITY USED FOR MAKING PURPOSES WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED.

SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>(Rural addresses must also include box or lot number)</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>(Village, town, village or city)</small>	DATE OF SIGNING
David Black	David Black	1008 Jones Street	Watertown, WI 53094	City	5/21/2018
Rebecca Wagoner	Rebecca Wagoner	1112 Jones Street	Watertown, WI 53094	Village	5/21/2018
Alvina Scuz	Northan Scuz	1108 Jones Street	Watertown, WI 53094	Village	5/21/2018
Jessika	Jin Scuz	1135 Jones Street	Watertown, WI 53094	Village	5/21/2018
Amalinda	Amira Scuz	1132 Jones Street	Watertown, WI 53094	Village	5/21/2018
Carly Peterson	Carly Peterson	533 Brookstone Way	Watertown, WI 53094	Village	5/21/2018
Lana Zimman	Lana Zimman	10373 Oak Street	Watertown, WI 53094	Village	5/21/2018
Tracy Zimman	Tracy Zimman	10373 Brookstone Way	Watertown, WI 53094	Village	5/21/2018
Alvina Scuz	Alvina Scuz	725 Brookstone Way	Watertown, WI 53094	Village	5/21/2018
Charisse Daniels	Charisse Daniels	1510 UTAH STREET	WATERTOWN, WI 53094	City	5/21/2018

I, Charisse Daniels (Name of elector) residing at 1510 UTAH STREET, WATERTOWN, WI 53094 (Residence including street, number and municipality) certify 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 obtained the signatures of the electors on this paper. I know that the signatures are elections of the jurisdiction or district that the candidate seeks to represent. I know that each signature is made with the proper knowledge of its content on the date indicated opposite the signature. 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(1)(b).  
 Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094  
 Date: 5/21/2018  
 Signature of Circulator: Charisse Daniels  
 Page No: 11

E-MAIL ADDRESS	PHONE NUMBER
Affidavit Signed	
Affidavit Signed	
Owens home, but rents in. Been in Hawaii	
Didn't sign, but wont sign affidavit	
Affidavit signed	
Vacant Lot	
Affidavit Signed	

(Circulator E-mail: Phone)



# NOMINATION PAPER FOR PARTISAN OFFICE

I, the undersigned, request the name of

## CHARISSE DANIELS

Residing at 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the office of REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT

I am eligible to vote in the 37th Assembly District. I have not signed the nomination paper of any other candidates for the same office at this election.

**THE MUNICIPALITY USED FOR MAILING PURPOSES, WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED.**

### SIGNATURES OF ELECTORS

1.	SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>(If a reference only, also include box or lot number)</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>(Indicate the name of the City)</small>	DATE OF SIGNING
1.	<i>Frank</i>	FRANK WILKINSKY	720 DENVER AVE.	Watertown, WI 53094	Down	5/20/2018
2.	<i>Kay</i>	KAY PROTOWSKI	2001 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
3.	<i>Lu</i>	ANTHONY SOLA	211 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
4.	<i>Mary</i>	MARCO SOLA	211 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
5.	<i>Small</i>	SOMER AMIS	310 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
6.	<i>Robert</i>	ROBERT AMIS	250 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
7.	<i>Tari</i>	TARI BAHN	508 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
8.	<i>Chris</i>	CHRIS BAHN	508 DENVER AVE	Watertown, WI 53094	Down	5/20/2018
9.	<i>Pamela</i>	PAMELA JONES	201 DENVER ST.	Watertown, WI 53094	Down	5/20/2018
10.	<i>Paul</i>	PAUL WANNER	21 E. DENVER ST.	Watertown, WI 53094	Down	5/20/2018

### CERTIFICATION OF CIRCULATOR

1. Charisse Daniels certifies: I reside at 1510 Utah Street, Watertown, WI 53094

(Name of Circulator)

(Circulator's address including street, number and municipality)

I further certify 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 calculated the nomination paper and signed each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district that the candidate seeks to run for and I am aware that falsifying this certification is punishable under Wis. Stat. § 12.13(2)(b).

Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094

Date: 5/20/2018  
Signature of Circulator: *Charisse Daniels*

Page No. 8

Please include your e-mail address if interested in receiving periodic campaign updates.

E-MAIL ADDRESS	PHONE NUMBER
Affidavit signed	
Affidavit signed	
Affidavit signed	
Did not sign, refused affidavit	
Did not sign, refused affidavit	
Affidavit signed	
Did not sign, refused affidavit	

(Circulator Email & Phone)





NOMINATION PAPER FOR PARTISAN OFFICE  
 I, the undersigned, request the name of  
**CHARISSE DANIELS**  
 Residing at 1510 Utah Street, Watertown, WI 53094, in the City of Watertown, be placed on the ballot at the general election to be held  
 November 6, 2018 as a candidate representing the Democratic Party, so that voters will have the opportunity to vote for her for the office of  
**REPRESENTATIVE TO THE ASSEMBLY - 37TH DISTRICT**  
 I am eligible to vote in the 37th Assembly District. I have not signed the nomination paper of any other candidates for the same office at this election.

THE MUNICIPALITY USED FOR MAILING PURPOSES WHEN DIFFERENT THAN THE MUNICIPALITY OF RESIDENCE IS NOT TO BE ENTERED IN THE NAME OF THE MUNICIPALITY OF RESIDENCE. MUST ALWAYS BE LISTED

SIGNATURES OF ELECTORS	PRINT NAME	STREET & NUMBER OR RURAL ROUTE <small>Real address must also include house or lot number</small>	CITY, ZIP	MUNICIPALITY OF RESIDENCE <small>Which town, village or city</small>	DATE OF SIGNING	E-MAIL ADDRESS	PHONE NUMBER
<i>[Signature]</i>	Susan Kruy	916 Reinhold St.	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Melody Joyce	801 E. Coety St.	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Amanda Groves	821 East Coety Street	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	STAVES JOYE	821 1ST CADY STREET	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Betty Zimmerman	644 E. Cady Street	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	RANDALL BISS	804 EAST CADY ST	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Amy Baerle	804 E. CADY STREET	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Deah Schultz	1031 Cady Street	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	Benget Brack	1031 Cady Street	Watertown 53094	Watertown	5/20/2018		
<i>[Signature]</i>	TORRESON	822 Cady St.	Watertown 53094	Watertown	5/20/2018		

(Circulator Email & Phone)  
 E-MAIL ADDRESS  
 PHONE NUMBER  
 Did not sign, no notary avail  
 Does not live at this address  
 Did not sign, no notary avail  
 Did not sign, no notary avail  
 Does not live at this address  
 Did not sign, not avail for affi  
 Does not live at this address  
 Signed affidavit

1. **Charisse Daniels** certify: I reside at 1510 Utah Street Watertown WI 53094  
(Circulator's residence including street number and municipality)  
 I further certify: I am either a qualified elector of Wisconsin or a U.S. citizen, age 18 or older who, if I have a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.02. I personally circulated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction in which I am circulating this nomination paper. 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 violating this certification is punishable under Wis. Stat. § 12.15(9) (b).  
 Return to: Charisse Daniels at 1510 Utah Street, Watertown, WI 53094  
 Date 5/20/2018  
 Signature of Circulator Charisse Daniels  
 Page No. 14

Exhibit 18

