

**COMPLAINT
BEFORE THE WISCONSIN GOVERNMENT ACCOUNTABILITY BOARD**

The Complaint of Richard L. Mantz, complainant, against Representative John Townsend and Randy Hopper, respondents.

I, Richard L. Mantz, hereby allege the following:

1. I am an adult resident of Fond du Lac County in the State of Wisconsin, and my address is 237 East Ninth Street, Fond du Lac, WI 54935.
2. I am filing this complaint against Representative John Townsend, whose address is 297 Roosevelt Street, Fond du Lac, WI 54935. Representative Townsend is the state representative to the Wisconsin Assembly and represents the 52nd district.
3. I am also filing this complaint against Randy Hopper, whose address is W5192 Rienzi Road, Fond du Lac, WI 54935. Mr. Hopper is the republican candidate for Wisconsin Senate in the 18th district.
4. This complaint alleges violations, including but not limited to, violations of the rules of the Wisconsin Assembly and Chapters 11 and 19 of the Wisconsin Statutes.
5. I am the chairperson of the Fond du Lac County Democratic Party and in that capacity have reviewed various documents and observed various interviews of partisan candidates for public office with districts that in whole or in part include Fond du Lac County.
6. Among the items I have observed and transcripts I have reviewed is an interview of Mr. Hopper, conducted by J.R. Ross, editor of wispolitics.com, and recorded by Wisconsin Eye on July 8, 2008.
7. In the interview, Mr. Hopper stated, "I came to Madison to meet with John to talk about my potential for running. We went to lunch and then we went back to his office and shut his door so we could talk about what I needed to do in the campaign."
8. Upon information and belief, and based upon additional portions of transcripts, "John" refers to Representative John Townsend.
9. Attached to this complaint is the transcript of the interview with Wisconsin Eye. It is marked as Exhibit 1.
10. Based upon the statements quoted above and additional portions of the transcripts, I believe that Mr. Hopper and Representative Townsend violated state law by

using the state office of Representative Townsend for political purposes and for their own personal political gain.

11. I certify that today I have sent by first class mail copies of this complaint to both respondents named herein.

VERIFICATION

I, Richard L. Mantz, being first duly sworn, state that the allegations in this complaint are true based on my personal knowledge, except those allegations stated on information and belief, which I believe to be true.

Dated this 7th day of August, 2008, in Fond du Lac County, Wisconsin.

Richard L. Mantz

State of Wisconsin)
Fond du Lac County)

Subscribed and sworn to before me this 7th day of August, 2008.