

RETURN DATE: MAY 3, 2016 : SUPERIOR COURT  
JANE MILLER : JUDICIAL DISTRICT OF DANBURY  
VS. : AT DANBURY  
THOMAS DUNKERTON : APRIL 27, 2016

**PETITION (GENERAL STATUTES § 9-63)**

The undersigned hereby submits this Petition, and represents as follows:

1. Jane Miller (hereinafter “Petitioner”), is a resident of Brookfield, Connecticut, and was a member of the Republican Party of the Town of Brookfield (hereinafter “Brookfield Republican Party”) and is a dedicated supporter of Republican principles.

2. Thomas Dunkerton (hereinafter “Defendant”) is the Republican Registrar of Voters for the Town of Brookfield, Connecticut.

3. On or about March 4, 2016, the Petitioner applied to become a member of the Brookfield Republican Party.

4. On April 19, 2016, the name of the Petitioner was improperly and unlawfully excluded from the enrollment list of the Brookfield Republican Party by Defendant.

5. The aforesaid action of Defendant was improper and unlawful for the following reasons:

- a. Defendant conducted a hearing where the evidence presented was insufficient to permit exclusion of Petitioner pursuant to General Statutes § 9-60 et seq.


- b. The conduct of the proceedings violated Petitioner's constitutional rights, including her rights to due process of law and freedom of association.
  - c. The accepted standard for membership in the Brookfield Republican Party allows members to occasionally support members of other candidates registered with other parties.
  - d. The action of the Defendant holds Petitioner to a standard not required by others.
6. As a result of Defendant's actions, Petitioner is aggrieved.

**PRAYER FOR RELIEF**

**WHEREFORE**, the Petitioner claims:

1. A writ of mandamus or order directing the Defendant, Thomas Dunkerton, to place the name of the Petitioner, Jane Miller, on the enrollment list of the Brookfield Republican Party.
2. Such other legal and equitable relief as the court deems just.

**THE PETITIONER**

By:   
Neil Marcus  
Alexander Copp  
Cohen and Wolf, P.C.  
158 Deer Hill Ave  
Danbury, CT 06810  
Tel: (203) 792-2771  
Fax: (203) 791-8149  
acopp@cohenandwolf.com  
Juris No. 100137