



HAND DELIVERED

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May 12, 2011

VIA MESSENGER

Mr. Kevin Kennedy
Wisconsin Government Accountability Board
212 East Washington Avenue, Third Floor
Post Office Box 7984
Madison, WI 53707-7984

Re: In Re Petition to Recall Senator Robert Wirch of the 22nd Senate District
WGAB ID # 0600005

Dear Mr. Kennedy:

Enclosed please find the Rebuttal of Petitioner to the Challenge of Senator Robert Wirch, which includes the Rebuttal Memorandum in Response to Senator Robert Wirch's Challenge, and the following Affidavits: Jonathan Megie, Jean Stussie, Richard Salway, Erin M. Decker and John Hogan.

By copy of this letter, we are providing copies of same to Attorney Levinson via e-mail and mail this date.

Sincerely,

MICHAEL BEST & FRIEDRICH LLP

Eric M. McLeod

EMM:skt

Enclosures

cc: Jeremy Levinson, Esq. (via e-mail & mail)

079081-0013\9195085.1

- b. Senator Wirch has alleged various improprieties regarding signature dates, including that the dates are illegible, that the signer used ditto marks or the date is otherwise a “bad date.” Reviewing the respective petition pages reveals that at least those challenges listed on the attached Exhibit B are without merit. Details regarding these signatures, including the name, date of signature, date of circulator certification, challenge spreadsheet error number and Recall Petition page number for each respective signature, are described on the attached Exhibit B.
- c. Senator Wirch has alleged that numerous signers of the Recall Petition do not reside within the 22nd Senate District. To test this assertion, I directed others to utilize the Wisconsin State Legislature’s online “Who Are My Legislators?” feature to spot check the validity of Senator Wirch’s claim. Where the Legislature’s system did not yield any information relating to the Senate District for a particular address, additional research was done via publicly available Kenosha County land records to determine the town, city or village that the address is located within. Through this two-tiered level of review, we have identified that all of the addresses listed on the attached Exhibit C are within the 22nd Senate District.
- d. Senator Wirch has alleged that the residency of numerous signers of the Recall Petition could not be determined because numerous circulators Recall Petition listed addresses that do not correspond to the municipality listed. Reviewing the respective petition pages reveals that at least those challenges listed on the attached Exhibit D are without merit because the addresses are located within the

municipalities listed. Details regarding these signatures, including the circulator name and address, the municipality listed on the challenge printout, the challenge spreadsheet error number and Recall Petition page number for each respective signature, are described on the attached Exhibit D.

- e. Senator Wirch has alleged that the residency of numerous circulators of the Recall Petition could not be determined because of various miscellaneous address issues. Reviewing the respective petition pages reveals that at least those challenges listed on the attached Exhibit E are without merit because the addresses given are sufficient to determine the respective residences. Details regarding these signatures are described on the attached Exhibit E.

5. The attached Exhibits A – E have been prepared at my direction based on my review of the Recall Petition and Senator Wirch’s challenge.

Dated this 12 day of May, 2011.

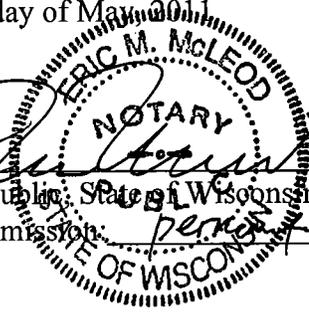


John W. Hogan

Subscribed and sworn to before me this
12th day of May, 2011



Notary Public, State of Wisconsin
My Commission: perpetual



079081-0013\9194536.1

Exhibit A

<i>ERROR</i>			<i>Alleged Duplicate</i>	
<i>NUMBER</i>	<i>Page Number</i>	<i>Name</i>	<i>Page #</i>	<i>Notes</i>
9	217	Jenna Bailey	550	Different names/Signature
11	361	Donnie J Buttke	464	Different names/Signature
14	599	Patricia Blount	599	Circular reference
15	604	Pam Alexander	347	Different handwriting/Signature
16	670	Joyce Christiansin	670	Circular reference
18	848	Jody Dehamer	848	Circular reference
20	943	Ros Mccaffery	1546	Different handwriting/Signature
21	1055	Antonio Covelli	1055	Circular reference
26	1290	Christine Turcotte	1466	Different handwriting/Signature
27	1390	Theresa Dorau	1390	Circular reference
28	1393	Donald Gunter	1085	Different handwriting/Signature
56	1851	Donna M Duda	344	Different handwriting/Signature
62	1916	Jill C Burelt	1916	Circular reference
69	2159	Lawrence Christenser	1138	Different names/Signature
72	2165	Jeremy Lynch	691	Different names/Signature
114	2655	Jorge DeJesus	1068	Different handwriting/Signature

Exhibit B

<u>NOTES</u>	<u>SIGNATORY NAME</u>	<u>PETITION DATE</u>	<u>CIRCULATOR DATE</u>	<u>ERROR NUMBER</u>	<u>PAGE NUMBER</u>		
<u>Bad</u>	Cindy Vrt		1-Apr	11-Apr	84	1101	
	Herb Gudel		2/28/2028	3/1/2011	86	1108	
	Janet Hightru		3/1/2004	3/5/2011	104	1283	
	Dan Schless		2/25/2010	3/8/2011	105	1284	
	John Kern		1/2/2011	4/2/2011	117	1459	
	C N		3/21/2010	3/25/2011	167	1722	
	R S	1/13/2011 and 1/3/12 loosely		4/13/2011	169	1769	
	William Feitz		2/5/11	3/5/11	200	2116	
	Michael Sulton		2/27/10	2/27/11	201	2132	
	Tim Beler		4/9/2010	4/12/11	216	2192	
	Shirly Welters		3/12/1	3/12/11	217	2211	
	Katie Honzik		4/1/11	4/12/11	223	2251	
	Gerald Seggell		2/2	3/2/11	261	2721	
	Jim Brolin		2-26-11	3/2/11	262	2721	
	Larry Worley		11.18.11	4/19/11	270	3246	
	F Noser		2/30/11	3/31/11	274	3328	
	Pat Hagen		2/30/11	3/31/11	275	<u>3328</u>	
	<u>Not Dated</u>	Frank Tschecki		11-Apr	12-Apr	12	190
		Paul Weidner		4/2/2011	4-Apr	34	467
		Vivien Koffman		Not Dated	8-Mar	56	905
Kru					57	915b	
Nushart Carol			20-Mar	31-Mar	82	1100	
Nushart James L.			20-Mar	31-Mar	83	1100	
Patricia Troedsi			3/25/2011	3/25/2011	149	1633	
Thomas Troedsi			3/25/2011	3/25/2011	150	1633	
Charles Barrett			4/2/2011	4/30/2011	176	1838	
Matthew ?			4/5/11	4/5/11	181	1959	
Renea Klimowicz			4/5/11	4/5/11	182	1959	
Cynthia Ziolkowski			4/5/11	4/5/11	183	1959	
Milt 1996 Peterson			4/5/11	4/5/11	184	1959	
Karen Hall			4/5/11	4/5/11	185	1959	
Lisa Krueger			4/5/11	4/5/11	186	1959	
Ewen Piehl			4/5/11	4/5/11	187	1959	
Joseph Sheteron			3/2/11	3/19/11	192	2066	
Nathan Best			3/19/11	3/25/11	197	2084	
Mary Kinkel			2/27/11	2/27/11	202	2132	
T A			4/11-1	4/13/11	215	2181	
R K			4/3/1	4/3/11	218	2218	
Vector			4/15/11	4/15/11	226	2256	
John McCord			2-27	2/27/11	229	2287	
Deb Johnson			4/3/11	4/19/11	255	2597	
			4/1/11	4/2/11	260	2716	
R Oillila			3/26/10	3/26/11	267	3064	
Bryan Shick			26 mar	3/26/11	271	3289	
Julia Swenson			mar 31	3/31/11	272	3293	
Carol Cirilli			Mar 31	3/31/11	273	3293	
Jess Baur			Ditto Marks	3/3/11	278	3354	
Wayne Bogner			2/26/11	3/3/11	279	3357	
Ryan Thlbaer			2/25/11	3/11/11	280	3357	
Michelle Davison			2/26/11	3/11/11	281	3357	
Gail Schwenn			2/25/11	3/11/11	282	3357	
Michael Gabail			2/25/11	3/11/11	283	3357	
Chris Mueller			2/25/11	3/11/11	284	3357	
Gary A Schwenn			2/25/11	3/11/11	285	3357	
<u>Date present</u>		James Daniel	357 E Market	Burlington		5	728
		Bradley Johnson	3700 108th St	Pleasant Prairie		8	874
		Guadalupe Perez	101 2nd Lane	Somers		12	1271
	Dixie Chapman	5912 19th Ave	Kenosha		33	2009	
	?				63	2083	
	Josh Frederick	6104 75th Ave	Kenosha		74	2161	
					131	2621	
				132	<u>2621</u>		
<u>Ditto Marks</u>	Alba Larson	7807 15th Ave	Kenosha		36	<u>2014</u>	
<u>Numerical Error</u>	Diana Moreland	9590 42nd Ct	Pleasant Prairie		6	766	
	Donald Becker	8522 43rd Ave	Kenosha		7	769	
	Dan Manoyan	9431 68th Ct	Kenosha		9	999	
	?	5721 80th Pl	Kenosha		22	1753	
	Jan Culat	27620 122nd	Trevor		23	1774	
					51	2052	
				52	2052		

Exhibit C

Error Number	Page Number	Challenged Name	Challenged Address	Challenged Municipality
4	41	Frances Fleck	21925 Schroeder Road	Kansasville
5	149	Greg Harris	5485 Spring Valley	Burlington-
11	122	B	40413 102nd St	Genoa City
12	137	Bernadine Gitzler	39510 91st St	Powers Lake
13	137	Charles Gitzler	39510 91st St	Powers Lake
14	137	Donna George	39505 91st St	Powers Lake
15	137	Douglas George	39505 91st St	Powers Lake
16	139	Mark Polz	39520 91st St	Powers Lake
17	139	Sandra Polz	39520 91st St	Powers Lake
21	162	Lawrence Paulson	219 West Lake	Silver Lake
29	196	William Audenby	33006 Karcher Road	Burlington-
30	196	Kim Van Patton	33106 Karcher Road	Burlington-
31	196	Deb Audenby	33006 Karcher Road	Burlington-
32	196	Eric van Patton	33106 Karcher Road	Burlington-
33	196	Jacqueline Braatz	32900 Karcher road	Burlington-
34	199	Julie Epping	29821 175th St	Salem
38	248	Jan Glas	21410 15th St	Union Grove
39	248	L Klan	21410 15th St	Union Grove
43	253	Todd Terry	6837 Foxtail Lane	Burlington-
50	288	Diane Houghton	12215 257th Ave	Trevor
51	288	Kirt Houghton	12215 257th Ave	Trevor
54	302	M A Schanet	801 Browns Lake	Burlington-
60	320	Stacy Ehlert	31626 Karcher Road	Burlington-
61	326	Eric Schulz	9409 Ashbury Lane	Pleasant Prairie
62	404	Jacqueline Leipzig	8707 10th Pl	Somers
63	408	Jack Thows	33808 Karcher Road	Burlington-
68	410	Timothy Vos	1172 Hidden Creek Lane	Burlington-
76	417	Theo Hauke	29510 Karcher Road	Burlington-
84	481	?	W1745 State Hwy 11	Burlington-
85	481	Larry Seversen	1636 Walburg Road ?	Burlington-
88	485	? Vos	1172 Hidden Creek Lane	Burlington-
91	489	Christine Thompson	33808 Karcher Road	Burlington-
105	503	Joel Crowbridge	326 Woodlawn Ave	Burlington-
112	533	Thomas Wienke	35411 Lake shore Drive	Burlington-
113	533	Susan Wienke	35411 Lake shore Drive	Burlington-
114	534	Neil Hams	300 S. River Road	Burlington-
115	535	Cheryl Tucker	1636 Walburg	Burlington-
116	540	Chris Bruckman	542 N. Browns Lake Drive	Burlington-
117	540	Raymond Lois	512 N. Browns Lake Drive	Burlington-
126	637	Mark Starzyk	39405 92nd Pl	Powers Lake
127	637	Audrey Willick	401 E. Washington	Burlington-
128	637	Geraldine Vander Zee	8912 388th Ave	Powers Lake
136	672	?	5303 Mormon Road	Burlington-
141	678	Al Ferber	11021 7th St	Sturtevant
143	680	Anna Fouser	337 Woodlawn	Burlington-
145	688	Jack Isaacson	28720 Karcher Road	Burlington-
151	697	Michael Skewes	1635 Walburg	Burlington-
156	706	Roman Myszkowski	39028 88th Pl	Powers Lake
157	706	Richard Braatz	32900 Karcher Road	Burlington-

<i>Error Number</i>	<i>Page Number</i>	<i>Challenged Name</i>	<i>Challenged Address</i>	<i>Challenged Municipality</i>
165	717	Kelly Peyron	32830 Karcher Road	Burlington-
168	723	Doug Hozl	1101 Hidden Creek	Burlington-
171	732	Barb Zelenski	32950 Karcher Road	Burlington-
173	733	Grant Peyron	32830 Karcher Road	Burlington-
175	735	Joyce Garland	33604 Karcher Road	Burlington-
176	735	Ralph Garland	33604 Karcher Road	Burlington-
185	816	Karin Glas	21208 15th St	Union Grove
191	922	Henry Fleck	21925 Schroeder Road	Kansasville
192	946	John Jensen	31720 Karcher Road	Burlington-
197	969	Bill Sachse	31121 31st St	Burlington-
201	974	Tony Martin	28720 Karcher Road	Burlington-
210	981	Carolyn Cass	6724 Horseshoe Tr	Burlington-
211	981	Mark Cass	6724 Horseshoe Tr	Burlington-
212	981	Gail Jensen	31720 Karcher Road	Burlington-
218	1011	Karen Schwedler	1042 N English Settlement	Burlington-
224	1096	Carmine Knetzer	201 N Musquequak St	Burlington-
229	1157	Sophie Kurylo	12762 249th Ave	Trevor
235	1234	James Behm	1191 118th Ave	Sturtevant
240	1328	Judith Voss	7801 88th Ave #298	Pleasant Prairie
243	1382	GPE	6110 80th PI #102	Kenosha
260	1531	Sally Douger	8 N River Road	Burlington-
261	1532	Lorraine Meisinger	135 N. River Road	Burlington-
262	1532	Ben Maze	135 N. River Road	Burlington-
263	1534	Michael Shelby	6803 Foxtail Lane	Burlington-
266	1538	Kathleen Ehlen	21512 15th St	Union Grove
290	1590	James Willich	28433 coyote Circle	Burlington-
294	1597	Timothy Vanders	PO Box 171	Powers Lake
327	1638	Charles Kuhfess	39014 90th st	Powers Lake
328	1638	Lisa Bjurstrom	1124 Hidden Creek Ln	Burlington-
329	1638	Melvin Bjurstrom	1124 Hidden Creek Ln	Burlington-
330	1638	Janell Arneson	1096 Hidden Creek Ln #202	Burlington-
332	1649	?	2820 11th PI #213	Sturtevant
341	1775	Ronald Jackson	11008 268th ave	Trevor
342	1806	Kathy Liebe	10227 82nd St	Pleasant Prairie
344	1828	Ken Porter	27809 1st St	Kansasville
345	1835	F M	801 Browns Lake Dr	Burlington-
346	1844	David Hill	31112 76th St	Salem
347	1846	Evelyn Garrity	420 s English Settlement	Burlington-
348	1856	Jaclyn Cooper	725 estate Dr	Twin Lakes
349	1858	Eugene Barabo	313 Hunt	Twin Lakes
352	1867	Benjamin Coughlan	13101 1st St	Sturtevant
353	1869	Gary Glas	21230 15th St	union Grove
356	1885	John Gordon	32916 Karcher Rd	Burlington-
357	1900	Nancy Block	216 Peters Parkway	Burlington-
359	1924	Margaret Starzyk	39405 92nd PI	Powers Lake
360	2013	?	?	
362	2023	?	1262 Village Center	Kenosha
404	2142	Pat Glas	21230 15th St	Union Grove
427	2240	Robert Groid	39011 87th PI	Powers Lake

Error Number	Page Number	Challenged Name	Challenged Address	Challenged Municipality
429	2401	?	2401 Springbrook Rd	Pleasant Prairie
432	2268	Luis Martinez	6525 27th Ave	Kenosha
438	2302	A Dines	8721 11th Ave	Kenosha
458	2379	?	32540 Academy Rd	Burlington-
471	2439	Lewis Pott	8222 Poppy Dr	Burlington-
477	2485	Brett Mayfield	11515 1st st #112	Sturtevant

<i>Error Number</i>	<i>Page Number</i>	<i>Challenged Name</i>	<i>Challenged Address</i>	<i>Challenged Municipality</i>
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Exhibit D

Circulator Name	Circulator Address	Petition Municipality	Error Number	Page Number
Carrie Jensen	4773 84th St, Kenosha	Pleasant Prairie	244	108
Darwin Schwaderer	23515 111th St, Trevor	Salem	783	665
Lynn Hauser	1445 240th Ave, Kansasville	Brighton	888	1027
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	1213	1387
Marilyn Knight	9038 24th Ave, Kenosha	Pleasant Prairie	1535	1834
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	1 - 9	5
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	10 - 18	6
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1006 - 1015	1116
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1029 - 1037	1140
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1038 - 1046	1141
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1047 - 1056	1142
Kathleen Proko	4727 352nd Ave, Burlington	Wheatland	1057 - 1059	1200
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1060 - 1069	1208
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1070 - 1075	1209
Carolyn Poole	6245 237th Ave, Salem	Paddock Lake	1076 - 1085	1263
John Poole	6245 237th Ave, Salem	Paddock Lake	1086 - 1095	1264
Carolyn Poole	6245 237th Ave, Salem	Paddock Lake	1096 - 1105	1266
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1106 - 1115	1274
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1116 - 1125	1279
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1126 - 1135	1280
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1136 - 1145	1283
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1146 - 1154	1284
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1160 - 1169	1305
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	1170 - 1174	1312
Frank Rondon	6223 63rd St, Kenosha	Somers	1177 - 1179	1349
Irvin Hughes	1650 72nd Ave, Kenosha	Somers	1180 - 1182	1352
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1183 - 1192	1383
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1193 - 1202	1384
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1203 - 1212	1385
Michael Papendick	21901 60th Pl, Bristol	Salem	1216 - 1217	1417
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	1218 - 1227	1429
Michael Grossman	25537 52nd St, Salem	Brighton	1228 - 1229	1437
Doris Roach	25166 72nd St #186, Salem	Paddock Lake	1232 - 1233	1463
Daniel Casmin	109 8th Ct, Racine	Somers	1234 - 1235	1493
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1243 - 1252	1558
Susan Govea	15510 38th St, Kenosha	Paris	125 - 133	68
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1253 - 1262	1559
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1269 - 1278	1602
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1279 - 1288	1603
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1289 - 1298	1604
Phillip Cleveland	11515 1st St, Sturtevant	Somers	1301 - 1304	1649
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1305 - 1314	1706
Robert Allen Lasch	26723 105th St, Trevor	Salem	1315 - 1321	1716
Darlene Lasch	26723 105th St, Trevor	Salem	1322 - 1324	1717
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1325 - 1334	1736
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1335 - 1344	1737
Susan Govea	15510 38th St, Kenosha	Paris	134 - 143	69
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1345 - 1348	1738
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1349 - 1354	1739
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1355 - 1364	1743
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1365 - 1374	1744
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1375 - 1383	1745
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	1384 - 1394	1746
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	1395 - 1397	1761
Bernard Kean	23611 127th st, Trevor	Salem	1398 - 1406	1779

Circulator Name	Circulator Address	Petition Municipality	Error Number	Page Number
Bernard Kean	23611 127th st, Trevor	Salem	1407 - 1416	1780
Bernard Kean	23611 127th st, Trevor	Salem	1417 - 1426	1781
Bernard Kean	23611 127th st, Trevor	Salem	1427 - 1436	1783
Marilyn Parker	26210 103rd St, Trevor	Salem	1437 - 1438	1785
Marilyn Parker	26210 103rd St, Trevor	Salem	1439 - 1448	1786
Susan Govea	15510 38th St, Kenosha	Paris	144 - 152	70
Marilyn Parker	26210 103rd St, Trevor	Salem	1449 - 1458	1787
Philip Dziki	29920 102nd St, Trevor	Salem	1459 - 1468	1788
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	1520 - 1528	1819
Marvin Haynes	24606 67th St, Salem	Paddock Lake	1529 - 1534	1832
Susan Govea	15510 38th St, Kenosha	Paris	153 - 161	71
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	1536 - 1545	1837
Patrick Poisl	3810 176th Ave, Kenosha	Paris	1546 - 1556	1867
Patrick Poisl	3810 176th Ave, Kenosha	Paris	1557 - 1566	1868
Patrick Poisl	3810 176th Ave, Kenosha	Paris	1567 - 1576	1869
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	1596 - 1605	1924
William Poisl	1413 172nd Ave, Union Grove	Paris	1606 - 1610	1964
Susan Govea	15510 38th St, Kenosha	Paris	162 - 170	72
Susan Govea	15510 38th St, Kenosha	Paris	171 - 178	73
Susan Govea	15510 38th St, Kenosha	Paris	179 - 185	74
Susan Govea	15510 38th St, Kenosha	Paris	186 - 190	75
Susan Govea	15510 38th St, Kenosha	Paris	19 - 22	19
Susan Govea	15510 38th St, Kenosha	Paris	191 - 198	77
Susan Govea	15510 38th St, Kenosha	Paris	199 - 208	78
Susan Govea	15510 38th St, Kenosha	Paris	200 - 217	79
Susan Govea	15510 38th St, Kenosha	Paris	218 - 227	80
Susan Govea	15510 38th St, Kenosha	Paris	228 - 229	89
Jason Myres	1280 Village Center Dr #6, Kenosha	Somers	23 - 25	23
Susan Govea	15510 38th St, Kenosha	Paris	230 - 233	90
Brian Buhn	13610 91st St, Kenosha	Bristol	234 - 241	91
Jon Buckingham	2425 11th St, Kenosha	Somers	242 - 243	102
Daniel Krueger	1419 94th Ave, Kenosha	Somers	245 - 246	115
Al Rogers	26730 104th St, Trevor	Salem	247 - 250	119
Mark Pelz	39520 91st St, Powers Lake	Randall	271 - 275	139
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	276 - 285	149
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	286 - 295	150
Marilyn Parker	26210 103rd St, Trevor	Salem	296 - 302	158
Dawn Stobaugh	9130 368th Ave, Twin Lakes	Randall	303 - 308	190
Jeffrey Swanson	3901 Prairie Village Dr, Kenosha	Pleasant Prairie	309 - 310	195
Dona Poelman	2935 Forest View Circle, Franksville	Yorkville	31 - 34	30
Jessica Laroque	24906 Hiawatha Dr, Kansasville	Dover	35 - 41	38
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	400 - 409	321
Jessica Laroque	24906 Hiawatha Dr, Kansasville	Dover	42 - 51	39
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	440 - 449	341
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	450 - 459	342
Jessica Laroque	24906 Hiawatha Dr, Kansasville	Dover	52 - 58	40
Michael Skalitzky	1415 97th ave, Kenosha	Somers	520 - 529	355
Michael Skalitzky	1415 97th ave, Kenosha	Somers	540 - 549	363
Michael Skalitzky	1415 97th ave, Kenosha	Somers	550 - 559	379
Michael Skalitzky	1415 97th ave, Kenosha	Somers	560 - 569	380
Michael Skalitzky	1415 97th ave, Kenosha	Somers	570 - 579	381
Michael Skalitzky	1415 97th ave, Kenosha	Somers	580 - 589	382
Susan Govea	15510 38th St, Kenosha	Paris	59 - 67	50
Michael Skalitzky	1415 97th ave, Kenosha	Somers	590 - 599	383
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	600 - 609	385

Circulator Name	Circulator Address	Petition Municipality	Error Number	Page Number
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	610 - 619	386
Charlie Molinaro	4909 Harrison Road, Kenosha	Pleasant Prairie	627 - 636	400
Joshua Tamayo	1138 87th Ave, Kenosha	Somers	637 - 645	455
Pete Loewen	4305 4th St, Kenosha	Somers	646 - 654	492
Mark Starzyk	39405 92nd Pl, Powers Lake	Randall	735 - 744	551
Paul Blount	24604 94th St, Salem	Paddock Lake	745 - 747	599
Patrick Poisl	3810 176th Ave, Kenosha	Paris	748 - 757	630
Patrick Poisl	3810 176th Ave, Kenosha	Paris	758 - 764	639
Teri McNamera	23620 111th St, Trevor	Salem	765 - 766	641
Ronald Kane	25355 Runyard Way West, Trevor	Salem	767 - 768	643
Patrick Poisl	3810 176th Ave, Kenosha	Paris	769 - 778	645
Michael Young	12002 223rd Ave, Bristol	Salem	779 - 780	651
John Kmiecik	26925 98th St, Trevor	Salem	781 - 782	662
Jody Voight	24908 125th St, Trevor	Salem	784 - 785	669
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	796 - 804	746
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	805 - 814	747
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	815 - 823	751
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	824 - 833	753
Linda Meyer	27051 101st St, Trevor	Salem	834 - 836	786
John Henry	24935 125th St, Trevor	Salem	837 - 838	791
Gary Pogachar	9840 272nd Ave, Trevor	Salem	839 - 840	803
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	841 - 850	839
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	851 - 860	840
Daniel Seward	26141 52nd St, Salem	Brighton	861 - 864	876
Kathleen Hall	23705 112th St, Trevor	Salem	877 - 878	917
Henry Fleck	21925 Schroeder Rd, Kansasville	Brighton	879 - 885	922
Rebecca Meisner	24927 113th St, Trevor	Salem	886 - 887	923
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	889 - 897	1032
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	898 - 907	1033
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	908 - 917	1034
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	918 - 927	1052
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	928 - 933	1060
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	934 - 943	1066
Geri Dougherty	9500 81st St, Pleasant Prairie	Pleasant Prairie	944 - 953	1082
Geraldine Myers-Witkov	27065 101st St, Trevor	Salem	964 - 965	1099
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	966 - 975	1111
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	976 - 985	1113
Deborah Prijic	4816 84th St, Kenosha	Pleasant Prairie	986 - 995	1114
John Prijic	4816 84th St, Kenosha	Pleasant Prairie	996 - 1005	1115
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	107 - 115	65
Cynthia sheldon-Orellar	7106 98th Ave Unit G, Kenosha	Kenosha	1155 - 1159	1304
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	116 - 124	66
Joy Wilson	7200 33rd Ave, Kenosha	Kenosha	1175 - 1176	1333
Adam Peregrin	1721 Sunset Drive, Twin Lakes	Twin Lakes	1230 - 1231	1462
Marsha Kowalski	30136 Lake hills Dr, Burlington	Burlington	1267 - 1268	1593
Sandra Remer	30020 Mound Dr, Burlington	Burlington	1577 - 1585	1894
Sandra Remer	30020 Mound Dr, Burlington	Burlington	1586 - 1595	1898
Ricky Resch	3780 116th St, Pleasant Prairie	Pleasant Prairie	1611 - 1613	1966
Richard Salway	23A Johnson Rd, Latham		1657 - 1664	2443
Jonathan Megie	2125 NW 124th St, Miami		1665 - 2407	2519-2599
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	251 - 260	128
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	261 - 270	130
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	361 - 370	316

Circulator Name	Circulator Address	Petition Municipality	Error Number	Page Number
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	371 - 380	317
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	381 - 390	318
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	391 - 399	319
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	410 - 419	326
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	420 - 429	327
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	430 - 439	328
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	460 - 469	345
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	470 - 479	346
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	480 - 489	347
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	490 - 499	348
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	500 - 509	349
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	510 - 519	350
Toss Bosman	5902 46th ave, Kenosha	Kenosha	530 - 539	358
Jonathan Cowl	4917 56th St, Kenosha	Kenosha	620 - 626	392
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	655 - 664	518
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	665 - 674	519
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	675 - 684	522
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	68 - 76	51
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	685 - 694	524
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	695 - 704	525
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	705 - 714	526
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	715 - 724	527
Jeff Lauer	8770 83rd Pl, Pleasant Prairie	Pleasant Prairie	725 - 734	528
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	78 - 86	62
Richard Grebel	2511 Driftwood Trail, Burlington	Burlington	786 - 795	706
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	87 - 96	63
Kandy Felter	101 E Market St, Burlington	Burlington	954 - 963	1096
Kathy Wepfer	10734 84th Pl, Pleasant Prairie	Pleasant Prairie	97 - 106	64

Exhibit E

Circulator Name	Circulator Address	Petition Municipality	Error Number	Page Number
<u>Circulator Abbreviated the Municipality Name</u>				
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1016 - 1025	1122
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1026 - 1028	1123
Jay Sorensen	11398 Wilmot Road,	Pleasant Prairie	1263 - 1265	1565
Jean Stussie	8408 Engler Ave,	St John	1647 - 1656	2320
Lisa Sorensen	11398 Wilmot Road,	Pleasant Prairie	311 - 320	260
Jay Sorensen	11398 Wilmot Road,	Pleasant Prairie	321 - 330	293
Jay Sorensen	11398 Wilmot Road,	Pleasant Prairie	331 - 340	294
Lisa Sorensen	11398 Wilmot Road,	Pleasant Prairie	341 - 350	295
Lisa Sorensen	11398 Wilmot Road,	Pleasant Prairie	351 - 360	296

Alleged Incomplete Address

Mark Bentzler	W993 Ski Hill Dr, Bur	Burlington	1266	1576
Richard Riscal	1201 S Nevada,	Colorado Springs	1616	2197
John Miller	7911 30th Ave,	Kenosha	1214 - 1215	1395
Genia Brooksbank	8201 66th St,	Kenosha	1299 - 1300	1613
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1469 - 1478	1805
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1479 - 1488	1806
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1489 - 1498	1807
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1499 - 1508	1808
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1509 - 1517	1809
Geri Dougherty	9500 81st St, Pleasant	Pleasant Prairie	1518 - 1519	1810
Richard Riscal	1201 S Nevada,	Colorado Springs	1617 - 1626	2198
Richard Riscal	1201 S Nevada,	Colorado Springs	1627 - 1636	2199

STATE OF WISCONSIN
BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

IN RE PETITION TO
RECALL SENATOR ROBERT WIRCH
OF THE 22nd SENATE DISTRICT

WGAB ID # 0600005

**REBUTTAL MEMORANDUM IN RESPONSE
TO SENATOR ROBERT WIRCH'S CHALLENGE**

INTRODUCTION

Once the Board cuts through Senator Wirch's rhetoric, it will conclude that he has clearly failed to offer a valid challenge. A careful review by the Board, and a proper application of the governing law, reveals that his challenge should be rejected and the Board should certify the sufficiency of the petition to recall Senator Wirch.

BACKGROUND

On February 24, 2011, Erin M. Decker filed with the Government Accountability Board ("GAB") a statement of her intention to circulate a petition (the "Recall Petition") seeking the recall of State Senator Robert Wirch and registered Taxpayers to Recall Robert Wirch the "Recall Committee") as a recall committee. Having satisfied the registration requirements of Wis. Stat. § 9.10(2)(d), this filing began the statutory 60-day time period within which Ms. Decker could circulate the Recall Petition.

During the following weeks, Ms. Decker circulated the Recall Petition with the able assistance of hundreds of volunteers from throughout the 22nd Senate District. On April 21, 2011, she delivered to GAB the Recall Petition, which includes approximately 18,300 signatures – nearly 5,000 more signatures than required to compel a recall election – on 2,668 separate pages. On May 5, 2011, Senator Wirch offered his purported challenge to the sufficiency of

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numerous signatures.¹ As explained below, many of Senator Wirch's challenges are baseless while other challenges involve correctable, technical deficiencies that are addressed by the numerous affidavits filed herewith. Senator Wirch has clearly failed to meet his burden of proving the invalidity of more than 4,500 of the signatures on the Recall Petition and GAB should certify the sufficiency of the Recall Petition.

ARGUMENT

Senator Wirch bears the burden of proving that more than 4,500 individual signatures on the Recall Petition are invalid. Wis. Stat. § 9.10(2)(g). His challenges to individual signatures must be based on more than mere rhetoric. In fact, his challenges must be supported by affidavits or other evidence that clearly prove the failure to comply with certain statutory requirements. Wis. Stat. § 9.10(2)(h). Senator Wirch has done a remarkable job of propping up his challenge with conjecture and suspicion – all in an effort to depict the extraordinary task that Ms. Decker successfully completed with the able assistance of hundreds of volunteers as nothing more than “a for-profit signature drive . . . without regard for Wisconsin’s laws or residents.” (Memo. in Support of Sen. Wirch Challenge to Petitions (hereafter, “Wirch Br.”) at 1.) But he has utterly failed to provide evidence to support this accusation. In fact, the detail of the specific challenged signatures shows the very grassroots nature of the recall effort.

The vast majority of the signatures Senator Wirch challenges are reflected in a series of spreadsheet printouts that were filed with his Verified Challenge as Exhibit 63-30. Senator Wirch does not provide any affidavit that establishes what Exhibit 63-22 represents, how the information included in the exhibit was selected or what the purported challenges are intended to represent. In ¶ 12 of his Verified Challenge, Senator Wirch describes various categories of

¹ It is difficult to determine the precise number of signatures that Senator Wirch is challenging, but his Verified Challenge enumerates only 1,282 challenged signatures.

challenged signatures that somewhat track with Exhibit 63-22 and he states that his challenges to some 3,735 signatures “are supported by the Affidavit of Michael L. Pfohl.” However, Mr. Pfohl’s affidavit² does not support those challenges and does not refer to Exhibit 63-22 in any way. The Government Accountability Board should reject the purported challenges reflected in Exhibit 63-22 because Senator Wirch has failed to demonstrate by affidavit or other supporting evidence that the statutory requirements were not met by the Recall Petition signers or circulators.

I. SENATOR WIRCH IMPROPERLY CHALLENGES NUMEROUS CIRCULATOR CERTIFICATIONS SIMPLY BECAUSE THE CIRCULATORS’ RESIDENT MUNICIPALITIES DO NOT HAVE SEPARATE POST OFFICES

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signatures that apparently are challenged because the respective circulator certifications include “two different municipalities listed for circulator from different handwriting.” For example, Senator Wirch apparently challenges all nine signatures on Petition Page No. 1, because the certification of circulator states that the circulator resides at “10789 Cty Rd G Coleman WI 54112 Brazeau.” It is an objective fact that the Town of Brazeau in Oconto County lies just a few miles from the Village of Coleman, does not have its own post office and is served by the Coleman post office. (Hogan Aff.) Senator Wirch has not provided any evidence or argument to explain why certifications of circulators that include both a post office address and separate notation of the specific municipality of residence violates the statutory requirement that the circulator “stat[e] his or her residence with street and number, if any.” Wis. Stat. §§ 8.40(2), 9.10(2)(a). As outlined more fully in the attached affidavits of Erin M. Decker and John Hogan, all such challenges are invalid.

² A document titled “PF Data affidavit” and signed by Michael L. Pfohl was filed with Senator Wirch’s challenge as Exhibit 59. That affidavit, however, on its face addresses, at most, only 372 signers of the Recall Petition.

II. GAB SHOULD REJECT SENATOR WIRCH'S CHALLENGES TO HUNDREDS OF SIGNATURES BECAUSE THE CIRCULATOR CERTIFICATIONS PURPORTEDLY INCLUDE INCOMPLETE ADDRESSES

Exhibit 63-22 to Senator Wirch's challenge includes a number of signatures that apparently are challenged because the respective circulator certifications include "incomplete circulator address." For example, Senator Wirch apparently challenges all ten signatures on Petition Page No. 1689, because he believes that the circulator's address is "incomplete" where the address is plainly written as "321 S. Washington St Apt 228 Green Bay." Senator Wirch has not provided any evidence or argument to explain why this certification of circulator violates the statutory requirement that the circulator "stat[e] his or her residence with street and number, if any." Wis. Stat. §§ 8.40(2), 9.10(2)(a). As outlined more fully in the attached affidavit of John Hogan, all such challenges are invalid.

In certain instances the certification of circulator did omit the municipality of residence. These deficiencies have been addressed by the affidavits of Jonathan Megie, Jean Stussie and Erin M. Decker, pursuant to Wis. Stat. § 9.10(2)(r).

Senator Wirch apparently challenges the validity of a number of signatures because the date on the certification of circulator is "bad or missing." Any such challenge related to the failure of the circulator to date the certification must be rejected, because no signatures on those petition pages may be stricken. Wis. Stat. § 9.10(2)(n). Furthermore, to the extent any challenged certifications of circulators did have problematic dates, these deficiencies have been addressed by the affidavit of Erin M. Decker, pursuant to Wis. Stat. § 9.10(2)(r).

III. SENATOR WIRCH HAS NOT PROVIDED ANY SUPPORT FOR HIS CHALLENGES TO THOUSANDS OF SIGNATURES BECAUSE THE SIGNERS PURPORTEDLY RESIDE OUTSIDE THE 30TH SENATE DISTRICT

Exhibit 63-22 to Senator Wirch's challenge includes a number of signatures that apparently are challenged because the respective signatories reside outside the 30th Senate

District. However, Senator Wirch does not provide any support for these challenges other than a sixty-seven page list of addresses that include the conclusory statement, “Signer out of district.” The method for properly making such a challenge is outlined in Wis. Admin. Code § GAB 2.07(5), which states that “[w]here it is alleged that the signer . . . does not reside in the district . . . the challenger may attempt to establish the geographical location of an address . . . by providing district maps, or by providing a statement from a postmaster or other public official.” Senator Wirch has provided no such evidence. This is not surprising, because as described in the affidavit of John Hogan, a check of numerous challenged addresses through the Wisconsin State Legislature’s online “Who Are My Legislators?” feature shows that they are, indeed, located within Senate District 30. Since Senator Wirch has failed to provide any evidence to support these challenges, he has not met his burden of proof and therefore GAB should reject all such challenges.

IV. GAB SHOULD REJECT SENATOR WIRCH’S CHALLENGES TO HUNDREDS OF SIGNATURES BECAUSE OF PURPORTED ISSUES WITH THE SIGNERS’ RESPECTIVE DATES

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signatures that apparently are challenged because the respective signer gave a “bad or missing” date or because the signer allegedly signed the Recall Petition after the certification of circulator. Many of these purported challenges are just false; others have been addressed by affidavits. As outlined more fully in the attached affidavits of Erin M. Decker and John Hogan, many of these challenges are invalid and must be rejected.

V. SENATOR WIRCH HAS NOT PROVIDED ANY SUPPORT FOR HIS CHALLENGES TO HUNDREDS OF SIGNATURES BECAUSE OF PURPORTED ISSUES WITH THE SIGNERS’ RESPECTIVE ADDRESSES

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signatures that apparently are challenged because of various, vaguely described issues with the signers’

respective addresses. Among these challenged signatures are hundreds of signatures that Senator Wirch alleges reflect the “incorrect municipality for address.” However, Senator Wirch does not provide any support for these challenges other than a sixteen page list of addresses that include various conclusory statements. He certainly provides no information that will assist GAB in determining whether the municipality of residence identified by a given signer is “incorrect” for the address given. As outlined more fully in the attached affidavits of Erin M. Decker and John Hogan, these challenges are invalid and must be rejected.

VI. GAB SHOULD REJECT SENATOR WIRCH’S CHALLENGES TO SCORES OF SIGNATURES THAT HE PURPORTS REPRESENT MULTIPLE SIGNATURES BY THE SAME SIGNER

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signatures that apparently are challenged because the respective signers signed the Recall Petition twice. As outlined more fully in the attached affidavits of John Hogan, many of these purported challenges are just false and should be rejected as invalid challenges.

VII. GAB SHOULD REJECT SENATOR WIRCH’S CHALLENGES TO HUNDREDS OF SIGNATURES THAT HE PURPORTS REPRESENT FORGERIES

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signatures that apparently are challenged because some unknown person or persons decided that various signatures look suspiciously similar in character. These challenges are categorized as either “fake signature,” “circulator forgery” or “signer forgery.” As with many other challenges leveled against the Recall Petition, Senator Wirch does not provide any direct proof by way of affidavit or other evidence to support these assertions of forgery.³

³ The challenge procedures in the context of a recall effort do not contemplate an evaluation of the type of opinion testimony offered by Senator Wirch. The Petitioner here does not have the ability to subpoena and cross examine Senator Wirch’s purported expert witness in order to rebut it. Such testimony is wholly unreliable in these proceedings. Absent direct proof of actual facts, the Board should reject Senator Wirch’s arguments. Speculation disguised as expert opinion is insufficient to challenge a recall petition.

His failure to support these allegations is quite telling, in light of the fact that Exhibit 1 to his challenge includes a “Forensic Document Examination Report” prepared by Anagraphics, LLC and signed by Robin D. Williams, MFS, MS, D-BFDE. That Report does not address any of the hundreds of signatures that Senator Wirch claims represent forgeries. Instead, Senator Hanson provided a twenty-page printout that on its face fails to establish these challenges by clear and convincing evidence, as required by GAB 2.07(4). The printout is replete with such equivocal statements as “similar writing,” “signatures . . . look the same” and “probably signed for both.” In the absence of any evidence that “demonstrat[es] a failure to comply with statutory requirements,” GAB should reject these challenges. Wis. Stat. § 9.10(2)(h).

VIII. GAB SHOULD REJECT SENATOR WIRCH’S CHALLENGES SIGNATURES THAT ARE BASED ON TELEPHONE SURVEYS

Exhibit 63-22 to Senator Wirch’s challenge includes a number of signature challenges that are characterized as “phone challenges.” As with all of the information provided in Exhibit 63-30, Senator Wirch has not provided any affidavit that explains how the list of “phone challenges” was generated. Indeed, Exhibit 63-22 is not even referenced or otherwise tied to Mr. Pfohl’s affidavit, in which he generally describes his firm’s telephone outreach efforts but does not identify any specific individual Recall Petition signers. The list of signatures that are subject to “phone challenges” is also not obviously tied to the individual affidavits scattered throughout Exhibits 16 – 58 to Senator Wirch’s challenge. Without some obvious tie between the signatures that are included on the list of “phone challenges” and evidence specific to those signatures, the challenges must be found invalid.

IX. THE CERTIFICATIONS SUPPLIED BY OUT-OF-STATE CIRCULATORS ARE VALID

Unable to identify a sufficient number of legitimate challenges to signatures on the Recall Petition, Senator Wirch attempts to discredit the entire petition effort by focusing on a handful of

out-of-state circulators. However, when all of the rhetoric has blown away, all that is left are the unremarkable allegations that a) people move from place to place, b) individuals that Senator Wirch characterizes as “nomadic” do not have permanent homes, and c) sometimes people use nicknames.

As examples of the unremarkable proposition that people move from place to place, Senator Wirch points out that Richard Madrill, Jonathan Megie and Jacqueline Morales all may have identified different residences in the past. None of the “evidence” that Senator Wirch submits in support of his theory establishes that any of these three individuals falsely certified their residences during the time they were circulating the Recall Petition. Richard Salaway provides a perfect example of the self-evident fact that people do move from place to place. His state of residence changed from New York to Texas while he was circulating the Recall Petition. (Salaway Aff.)

The “evidence” Senator Wirch provided with respect to Jay Taylor and Richard Riscoll simply shows that they are among those individuals in this country that do not keep a home or apartment at all times. (Taylor Aff.; Riscoll Aff.) Finally, the affidavits Senator Wirch provides to show that Mark Vigil introduced himself as “Ruben” to prospective signers do not establish any “failure to comply with statutory requirements” related to the circulation of the Recall Petition. Wis. Stat. § 9.10(2)(h).

X. GAB HAS NO AUTHORITY TO EXCLUDE ALL SIGNATURES CERTIFIED BY SPECIFIC CIRCULATORS

Against the clear intent of the electors in his district, Senator Wirch asserts that entire petition pages must be excluded where there are allegations that some of the signatures gathered by a particular circulator were improper. These arguments are at best intentionally misleading and at worst entirely frivolous. The arguments stand in direct conflict with the actual legal

standards, including those set forth in Wis. Stat. § 9.10(2), and brazenly misstate Wisconsin law in an effort to disenfranchise the substantial portion of the electorate in the 30th Senate District that properly signed the petition to recall Senator Wirch.

Senator Wirch seeks to challenge the entire recall effort based on hyperbolic assertions of “staggering fraud rates” and “fraudulent circulator certifications.” According to Senator Wirch, Wisconsin law requires that “[w]here fraud can be established on the part of a circulator, all sheets submitted by such a circulator should be stricken.” This is nonsense. Even if there were a shred of validity to these outrageous assertions, Wisconsin law does not provide for the wholesale discarding of otherwise valid recall petition signatures based on assertions that some signatures are gathered improperly.

A. A Challenge Must Address the Validity of Individual Signatures.

An elected official facing recall may challenge the validity of a recall petition pursuant to Wis. Stat. § 9.10. Amazingly, Senator Wirch’s challenge completely ignores those statutory provisions and, instead, attempts to mislead the Board with unsubstantiated accusations of fraud. The governing standards do not allow the Board to strike valid recall petition signatures based on allegations of fraud in the collection of other signatures.⁴

With the exception of Wis. Stat. § 9.10(2)(em), an officer challenging the validity of a recall petition must identify individual grounds for striking individual signatures. See Wis. Stat. § 9.10(2). An individual signature on a petition sheet may be challenged for a number of recognized reasons. For example, the challenger may offer evidence that a person signed the

⁴ It is true that the Board may not count signatures on a sheet where the circulator fails to sign the certificate of circulator or where the circulator is not a qualified circulator. Wis. Stat. § 9.10(2)(em). However, the legislature also provided petitioners the opportunity to correct any insufficiencies in the petition including, but not limited to, a circulator’s failure to sign the certificate of circulator or include all information necessary to verify his or her status as a valid circulator. This provision clearly reinforces the position that valid signatures are to be counted whenever possible, even where the circulator fails to strictly comply with the technical requirements of the recall statutes.

petition more than once, that someone other than the elector signed for the elector, that the date on the signature was altered, or that a signer was not eligible to sign the petition. Wis. Stat. § 9.10(i)-(L).

However, the statutes clearly require the inclusion of valid signatures. See Wis. Stat. § 9.10(2)(m)-(p). For example, “[n]o signature may be stricken on the basis that the elector was not aware of the purpose of the petition.” Wis. Stat. § 9.10(2)(m). Further, “[n]o signature may be stricken if the circulator fails to date the certification of circulator.” Wis. Stat. § 9.10(2)(n). Significantly, the statutes also provide that where a signature is crossed out or altered before filing, the alteration “does not affect the validity of the other signatures on the petition sheet.” Wis. Stat. § 9.10(2)(p). This provision, especially, illustrates that the legislature intended that properly executed signatures be counted wherever possible. The courts agree and have characterized individual signatures as “separate” and “independent.” *State ex. re. Baxter v. Beckley*, 192 Wis. 367, 371, 212 N.W. 792 (1927). According to the Wisconsin Supreme Court, in evaluating the validity of a recall petition, “each signature is to be regarded as a separate and independent unit and by itself and cannot be added to or have necessary elements supplied from or by that which may be done in the same petition by others.” *Id.*

Again, statutory rules make it abundantly clear that, with very limited exceptions, a challenger must challenge individual signatures. Arguably, Senator Wirch could challenge the validity of each individual signature he erroneously asserts was fraudulently gathered. However, even if some signatures were invalid on that basis, it would not allow for the wholesale exclusion of valid signatures.

B. Wisconsin Courts Have Recognized That The Wholesale Exclusion of Entire Petition Sheets is Impermissible.

In addition to ignoring the rules that govern a petition challenge, Senator Wirch's argument also mischaracterizes Wisconsin court decisions reinforcing the notion that valid petition signatures must be counted whenever possible. In fact, a plain reading of the cases cited in the challenge reveals that those cases compel the Board to evaluate Senator Wirch's challenge in accordance with the applicable standards and give effect to the will of the electors. Voiding entire pages of a petition based on vague and unsubstantiated accusations of fraud concerning a relatively few individual signatures is contrary to the rights of the electors as required by Wis. Stat. § 5.01(1). *Stahovic v. Rajchel*, 122 Wis. 2d 370, 376, 363 N.W.2d 243 (Ct. App. 1894) (citing *State ex rel. Dithmar v. Bunnell*, 131 Wis. 198, 206, 110 N.W. 177 (1907)). Simply put, the cases do not authorize the Board to go beyond the scope of § 9.10(2) and strike entire pages of the recall petition containing otherwise valid signatures.

In *Stahovic v. Rajchel*,⁵ the court of appeals directly addressed whether the violation of a signature provision impeaches the circulator's affidavit and, as such, invalidates the entire petition page. *Stahovic*, 122 Wis. 2d at 376. There, the Greenfield city clerk decided to disallow entire pages of a recall petition where he discovered a defective signature. *Id.* at 374. In disallowing the pages, the clerk argued that "even one defective signature impeached the circulator's affidavit and that, therefore, the remaining signatures on the page must also be disallowed." *Id.*

⁵ Senator Wirch cites *Stahovic* for the proposition that the Board should invalidate every sheet submitted by a circulator where there is alleged to be fraud. However, the passage cited as binding Wisconsin precedent is pulled from dicta discussing an inapposite decision of the Illinois Supreme Court. See *Stahovic*, 122 Wis. 2d at 378.

The court squarely disagreed, finding that it is not in the interest of the electors “to reject otherwise valid signatures, representing the will of the electorate, because they appear on the same page as an invalid signature.” *Id.* at 377. According to the court, a signature may not be detracted from or discredited by alleged flaws contained in neighboring signatures. *Id.* at 377-78 (citing *Baxter v. Beckley*, 192 Wis. at 371, 212 N.W. at 794). This is so because each signature must be considered separately and independently from all other signatures in the petition. *Id.* at 377. (citing *Baxter*, 192 Wis. at 371). In fact, the *Stahovic* court went even further, holding that a proposed administrative rule authorizing the discarding of an entire petition sheet based on one invalid signature would be patently unconstitutional. *Id.* at 378. The Wisconsin Constitution, on which the right to recall is based, “contains no provision authorizing invalidation of otherwise valid recall signatures simply because they appear on a petition with a defective signature.” *Id.*

In discussing *Stahovic*, Senator Wirch’s challenge plainly, and perhaps intentionally, ignores the central holding of the decision and the court’s clear directive that recall signatures be counted whenever possible. The challenge cites dicta and completely ignores the fact that the court in *Stahovic* repeatedly states that election laws exist to secure the rights of the electors, not defeat them. *Id.* at 376. In accordance with this principle, Wisconsin law requires the preservation of valid recall signatures, even where they are accompanied by allegedly invalid signatures. *Id.* at 379.

Senator Wirch’s challenge mischaracterizes the law and attempts to mislead the Board based upon wholly unsubstantiated allegations of “staggering fraud rates.” Senator Wirch has ignored the relevant provisions of Wis. Stat. § 9.10, choosing instead to present an incoherent challenge with misleading analyses. Senator Wirch’s arguments should be rejected by the Board.

CONCLUSION

Senator Wirch has failed to meet his burden of proving the invalidity of a sufficient number of signatures on the Recall Petition. Many of the signatures he challenges are facially valid. Other challenges he levels are unsupported by affidavits or other evidence sufficient to meet his burden of proving that the statutory requirements were not met. The Government Accountability Board should reject his challenge, certify the sufficiency of the Recall Petition and call a recall election.

Dated this 12th day of May, 2011.

MICHAEL BEST & FRIEDRICH LLP
Attorneys for Petitioner

By: 
Eric M. McLeod, State Bar No. 1021530
Raymond P. Taffora, State Bar No. 1017166
Michael P. Screnock, State Bar No. 1055271

MICHAEL BEST & FRIEDRICH LLP
One South Pinckney Street, Suite 700
Post Office Box 1806
Madison, WI 53701-1806
Telephone: 608.257.3501
Facsimile: 608.283.2275

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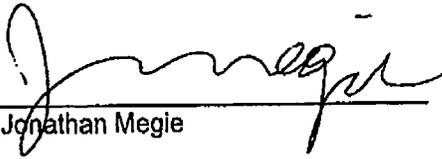
STATE OF WISCONSIN
BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD.

IN RE PETITION TO
RECALL SENATOR ROBERT WIRCH
OF THE 22nd SENATE DISTRICT

WGAB ID # 0600005

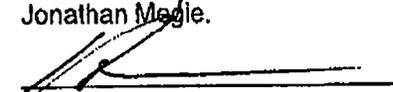
INDEX TO AFFIDAVITS

1. Jonathan Megie
2. Jean Stussie
3. Richard Salway
4. Erin M. Decker


Jonathan Megie

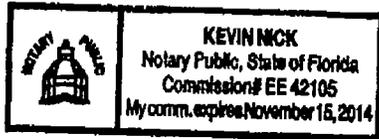
5-12-11
Date

This instrument was acknowledged before
Me on May 12, 2011 by
Jonathan Megie.


Signature

Sales and Service Specialist
Title (and Rank)

My Commission Expires: _____



STATE OF WISCONSIN
BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

IN RE PETITION TO
RECALL SENATOR DAVE HANSEN
OF THE 30th SENATE DISTRICT

IN RE PETITION TO
RECALL SENATOR ROBERT WIRCH
OF THE 22nd SENATE DISTRICT

IN RE PETITION TO
RECALL SENATOR JIM HOLPERIN
OF THE 12th SENATE DISTRICT

AFFIDAVIT OF JEAN STUSSIE

STATE OF Missouri)
COUNTY OF St. Louis) ss.

1. My name is Jean Stussie. I am an adult resident of the State of Missouri and make this affidavit on the basis of my own personal knowledge. I would be eligible to vote in the State of Wisconsin if I were a resident of the state

2. In February, March and April of this year, 2011, I circulated a petition for the recall of State Senator Dave Hansen. Copies of the petition pages I circulated have previously been submitted to the Government Accountability Board, including those pages attached to this affidavit as Exhibit A.

3. In February, March and April of this year, 2011, I circulated a petition for the recall of State Senator Robert Wirch. Copies of the petition pages I circulated have previously been submitted to the Government Accountability Board, including the page attached to this affidavit as Exhibit B.

4. In February, March and April of this year, 2011, I circulated a petition for the recall of State Senator Jim Holperin. Copies of the petition pages I circulated have previously been submitted to the Government Accountability Board.

5. At the time I circulated the attached petition pages, I resided at 8408 Engler Avenue in the City of St. John, Missouri. I currently reside at the same address. St. John, Missouri does not have its own zip code, so my mailing address is 8408 Engler Avenue, St. Louis, MO 63114.

6. The purpose of this affidavit is to provide the Government Accountability Board with information identifying the municipality in which I reside as such information was either missing from my certification of circulator and/or has been questioned by Senators Hansen, Wirch and Holperin.

Jean Stussie
Jean Stussie

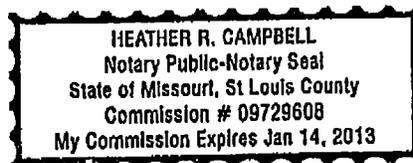
5/11/11
Date

This instrument was acknowledged before
Me on May 11, 2011 by
Jean Stussie.

Heather Campbell

Signature

Notary Public
Title (and Rank)



My Commission Expires: 01/14/13

Exhibit A

RECALL PETITION

TO: WISCONSIN GOVERNMENT ACCOUNTABILITY BOARD
(official with whom nomination papers or declaration of candidacy for the office is filed)

We, the undersigned qualified electors of the 30TH WISCONSIN STATE SENATE DISTRICT
(jurisdiction or district of officeholder)

petition for the recall of DAVE HANSEN, 30TH DISTRICT STATE SENATE OF WI from office pursuant
(name of officeholder to be recalled and office)

to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

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

SIGNATURES OF ELECTORS	STREET & NUMBER OR RURAL ROUTE <small>Rural address must also include box or fire no.</small>	MUNICIPALITY OF RESIDENCE <small>Indicate Town, City, or Village</small>	DATE OF SIGNING
1. <u>MWD [Signature]</u>	<u>571 CLEMENT GREEN BAY</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>GREEN BAY</u>	<u>4-16-11</u>
2.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
3.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
4.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
5.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
6.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
7.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
8.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
9.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
10.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	

I, Jean Stussie **Certification of Circulator**, certify:
(name of circulator)

I reside at 8408 Engler Ave
(circulator's residence - include number, street, and municipality)

I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. 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 support this recall petition. I am aware that falsifying this certification is punishable under §.12.13(3)(a), Wis. Stats.

4/16/11 Jean Stussie
(date) (signature of circulator)

RECALL PETITION

TO: WISCONSIN GOVERNMENT ACCOUNTABILITY BOARD
(official with whom nomination papers or declaration of candidacy for the office is filed)

We, the undersigned qualified electors of the 30TH WISCONSIN STATE SENATE DISTRICT
(jurisdiction or district of officeholder)

petition for the recall of DAVE HANSEN, 30TH DISTRICT STATE SENATE OF WI from office pursuant
(name of officeholder to be recalled and office)

to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

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

SIGNATURES OF ELECTORS	STREET & NUMBER OR RURAL ROUTE <small>Rural address must also include box or fire no.</small>	MUNICIPALITY OF RESIDENCE <small>Indicate Town, City, or Village</small>	DATE OF SIGNING
1. <u>Ronald Noun</u>	<u>365 Hattie St Menomonee WI 54143</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Menomonee</u>	<u>4/14/11</u>
2. Steve [unclear]	N 8th [unclear]	<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
3. <u>Walter [unclear]</u>	<u>W 15th St [unclear]</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>West CO</u>	<u>4-14-11</u>
4. <u>Don [unclear]</u>	<u>1741 W [unclear]</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4-14-11</u>
5. [unclear]	[unclear]	<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
6. <u>Mikey [unclear]</u>	<u>1207 Bond St. Green Bay WI 54303</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4-14-11</u>
7. <u>Alisha [unclear]</u>	<u>425 14th Ave #16 Green Bay WI 54303</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4.14.11</u>
8. <u>Nick [unclear]</u>	<u>2999th St 909 9th GB 54304</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>GB</u>	<u>4/14/11</u>
9. <u>Earl [unclear]</u>	<u>9562 Yates Rd Kenosha WI 53143</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-14-11</u>
10. <u>Judy Kraft</u>	<u>2459 E. Shore Dr Green Bay, WI 54302</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>J. B</u>	<u>4-14-11</u>

Certification of Circulator

I, Jean Stussio, certify:

I reside at 8408 Engler Ave
(circulator's residence - include number, street, and municipality)

I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. 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 support this recall petition. I am aware that falsifying this certification is punishable under §.12.13(3)(a), Wis. Stats.

4/14/11
(date)

Jean Stussio
(signature of circulator)

RECALL PETITION

TO: WISCONSIN GOVERNMENT ACCOUNTABILITY BOARD
(official with whom nomination papers or declaration of candidacy for the office is filed)

We, the undersigned qualified electors of the 30TH WISCONSIN STATE SENATE DISTRICT
(jurisdiction or district of officeholder)

petition for the recall of DAVE HANSEN, 30TH DISTRICT STATE SENATE OF WI from office pursuant
(name of officeholder to be recalled and office)

to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

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

SIGNATURES OF ELECTORS	STREET & NUMBER OR RURAL ROUTE <small>Rural address must also include box or site no.</small>	MUNICIPALITY OF RESIDENCE <small>Indicate Town, City, or Village</small>	DATE OF SIGNING
1. <i>Daniel B. ...</i>	<u>609 1276 Av.</u> <u>Green Bay, WI</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>04/14/11</u>
2. <i>Raymond D. ...</i>	<u>613 H. U. ... ST</u> <u>APT 1154303</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>BAV</u>	<u>04/14/11</u>
3. <i>Richard P. LeRoy</i>	<u>1331 Bellvue St. ...</u> <u>Green Bay, WI 54302</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4-14-11</u>
4. <i>Janie Blasing</i>	<u>2112 Willow Creek Rd</u> <u>Greene WI 54153</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Greene</u>	<u>4-14-11</u>
5. <i>Henry Mavis</i>	<u>431 Hillcrest Hts</u> <u>GREEN BAY WI 54302</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>HOWARD</u>	<u>4/14/11</u>
6. <i>[Signature]</i>	<u>1207 Bond Street</u> <u>Green Bay, WI 54303</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4/14/11</u>
7. <i>[Signature]</i>	<u>387 Vandewater Blk</u> <u>Green Bay WI 54301</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Attorneys</u>	<u>4/14/11</u>
8. <i>B. Gonzalez</i>	<u>462 14th Ave</u> <u>Green Bay WI 54304</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Green Bay</u>	<u>4/14/11</u>
9. <i>Marquante Revah...</i>	<u>1401 5th St. ...</u> <u>54304</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>GREEN BAY</u>	<u>4-14-11</u>
10. <i>Shadya A. Musick</i>	<u>9562 Yates Rd.</u> <u>Green WI 54139</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>LENA</u>	<u>4-14-11</u>

I, Jean Stussie Certification of Circulator, certify:
(name of circulator)
 I reside at 8408 Engler Ave
(circulator's residence - include number, street, and municipality)

I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. 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 support this recall petition. I am aware that falsifying this certification is punishable under §.12.13(3)(a), Wis. Stats.

[Signature] 4/14/11 *[Signature]* Jean Stussie
(date) (signature of circulator)

Exhibit B

RECALL PETITION

TO: Wisconsin Government Accountability Board
(official with whom nomination papers or declaration of candidacy for the office is filed)

We, the undersigned qualified electors of the 22nd Wisconsin State Senate District
(jurisdiction or district of officeholder)

petition for the recall of Robert Wirch 22nd District State Senate of Wisconsin
(name of officeholder to be recalled and office)

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §9.10 of the Wisconsin Statutes.

STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Refusing to represent the citizens of Wisconsin 22nd State Senate District in Madison.



THE MUNICIPALITY USED FOR MAILING PURPOSES, WHEN DIFFERENT THAN MUNICIPALITY OF RESIDENCE, IS NOT SUFFICIENT. THE NAME OF THE MUNICIPALITY OF RESIDENCE MUST ALWAYS BE LISTED.			
SIGNATURES OF ELECTORS	STREET & NUMBER OR RURAL ROUTE <small>Rural address must also include box or fire no.</small>	MUNICIPALITY OF RESIDENCE <small>Indicate Town, City, or Village</small>	DATE OF SIGNING
1.	5037 58 th St KENOSHA WI. 53144	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>KENOSHA</u>	4-14-11
2.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
3.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
4.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
5.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
6.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
7.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
8.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
9.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	
10.		<input type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City	

I, Jean Stussie **Certification of Circulator**, certify:

I reside at 8408 Engle Ave
(circulator's residence - include number, street, and municipality)

I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. 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 support this recall petition. I am aware that falsifying this certification is punishable under §.12.13(3)(a), Wis. Stats.

4/14/11 (date) Jean Stussie (signature of circulator)

Please mail this form to: **Recall Wirch**

P.O. Box 26 • Silver Lake, WI 53170

Page No. 207

GAB-179 (Rev. 6/2007) The information on this form is required by §§. 2.40 and 9.10, Wis. Stats. This form is prescribed by the Government Accountability Board, P.O. Box 7984, Madison, WI 53707-7984 608-265-8005, <http://gab.wis.gov> email: gab@wi.gov

RECALL PETITION

TO: Wisconsin Government Accountability Board

(official with whom nomination papers or declaration of candidacy for the office is filed)

We, the undersigned qualified electors of the 22nd Wisconsin State Senate District

(jurisdiction or district of officeholder)

petition for the recall of Robert Wirch 22nd District State Senate of Wisconsin

(name of officeholder to be recalled and office)

from office pursuant to Article XIII, Section 12 of the Wisconsin Constitution and §.9.10 of the Wisconsin Statutes.

STATEMENT OF REASON FOR RECALL

(The reason for recall must be stated on petitions for city, village, town, and school district officials. The reason must be related to the official responsibilities of the officeholder. No statement of reason is required to initiate the recall of state, congressional, legislative, judicial, or county officials.)

Refusing to represent the citizens of Wisconsin 22nd State Senate District in Madison.



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

SIGNATURES OF ELECTORS	STREET & NUMBER OR RURAL ROUTE <small>Rural address must also include box or fire no.</small>	MUNICIPALITY OF RESIDENCE <small>Indicate Town, City, or Village</small>	DATE OF SIGNING
<u>Egin Davis</u>	<u>8543 12th PL</u> <u>Somers 53171</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Somers</u>	<u>4-4-11</u>
2. <u>Jodi Kreuser</u>	<u>5215 58th Ave</u> <u>Kenosha, WI 53144</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
3. <u>Veronica Kasper</u>	<u>6046 32nd Ave</u> <u>Kenosha, WI</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
4. <u>Vanessa Garcia</u>	<u>3327 24th St #B</u> <u>Kenosha, WI 53144</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
5. <u>Carrie Peters</u>	<u>9125 S Ave</u> <u>O.P.R. WI 53156</u>	<input type="checkbox"/> Town <input checked="" type="checkbox"/> Village <input type="checkbox"/> City <u>Pleasant Prairie</u>	<u>4-4-11</u>
6. <u>Darlene Draeger</u>	<u>5903 ST 31 ST</u> <u>Kenosha</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
7. <u>Mike Dewey</u> <u>Michael Dewey</u>	<u>5903 #31st</u> <u>53144</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
8. <u>Cristina Gonzalez</u>	<u>1418 16th Ave Kenosha</u> <u>53140</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
9. <u>Andrea Ekstrom</u>	<u>1321 East</u> <u>53140 Kenosha</u>	<input checked="" type="checkbox"/> Town <input type="checkbox"/> Village <input type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>
10. <u>Phillip Mueker</u>	<u>2604 75th St</u> <u>Kenosha WI 53143</u>	<input type="checkbox"/> Town <input type="checkbox"/> Village <input checked="" type="checkbox"/> City <u>Kenosha</u>	<u>4-4-11</u>

Certification of Circulator

I, Jean Stussie

(name of circulator)

I reside at 8408 Engler Ave St. John, Missouri 63114

(circulator's residence - include number, street, and municipality)

I personally circulated this recall petition and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district represented by the officeholder named in this petition. 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 support this recall petition. I am aware that falsifying this certification is punishable under §.12.13(3)(a), Wis. Stats.

4/4/11
(date)

Jean Stussie
(signature of circulator)

Please mail this form to: Recall Wirch

AFFIDAVIT OF RICHARD SALWAY

1. My Name is Richard Salway. I am an adult resident of the State of Texas. My current residence is at 5826 Brierley Lane in Houston, Texas.
2. In late March of this year, I temporarily relocated to Wisconsin to participate in an effort to gather petition signatures to recall Democrat Senators.
3. At the time of my temporary relocation to Wisconsin, I resided at 23 A Johnson Rd in Latham, New York with my parents.
4. My parents have resided at the Latham address for approximately twenty years, and I had resided there since 2009.
5. In early April, my parents moved to their new permanent address in Houston Texas. I was still working in Wisconsin at this time.
6. At this time I began signing my Circulator Certification with my new Texas address, where I intended to return after the expiration of my commitment in Wisconsin.
7. My personal belongings are located at the Texas address, where I also receive my mail.

Richard Salway
Richard Salway

5-6-11
Date

STATE OF WASHINGTON

COUNTY OF King

On this day personally appeared before me Richard Salway, to me known to be the individual (s) described in and who executed the within and foregoing instrument, and acknowledged that he/she/they signed the same as his/her/their free and voluntary act and deed, for the uses and purposes therein mentioned.

Given under my hand and seal of office this 6 day of May, 2011.

Jeremy Barend
Notary Public residing at Shoreline, WA

Printed Name: Jeremy Barend

My Commission Expires:
May 13, 2014



STATE OF WISCONSIN
BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

IN RE PETITION TO
RECALL SENATOR ROBERT WIRCH
OF THE 22nd SENATE DISTRICT

AFFIDAVIT OF ERIN M. DECKER

STATE OF WISCONSIN)
) ss.
COUNTY OF KENOSHA)

1. My name is Erin M. Decker and I live at 706 School Street, Silver Lake, Wisconsin 53170. I am an adult resident of the State of Wisconsin and make this affidavit on the basis of my own personal knowledge.

2. I am the Petitioner in the above captioned matter that is presently before GAB.

3. On February 24, 2011, I filed with the Government Accountability Board a statement of my intention to circulate a petition seeking the recall of State Senator Robert Wirch, who currently represents the 22nd Senate District. On that same date I also registered Taxpayers to Recall Robert Wirch (the "Recall Committee") with GAB as a recall committee.

4. During February, March and April of this year, 2011, within the 60-day time period following the February 24, 2011 filing with GAB, I circulated the petition to recall Senator Wirch (the "Recall Petition"). On April 21, 2011, I delivered the Recall Petition to GAB.

5. During the months of February, March and April of this year, 2011, I was personally involved in many of the activities associated with circulating the Recall Petition, including creating the form of recall petition page that the Recall Committee distributed to individual circulators, providing information to individual circulators and answering their questions regarding proper circulation procedures and reviewing individual petition pages that circulators provided the Recall Committee.

6. I helped create the stated reason for seeking to recall Senator Wirch that was included on the Recall Petition pages. That stated reason is: "Refusing to represent the citizens of Wisconsin 22nd State Senate District in Madison." I know that the reference to Senator Wirch "refusing to represent the citizens" of his Senate District relates to Senator Wirch's decision to flee the State of Wisconsin in February 2011 and hide out in Illinois, in an effort to prevent the State Senate from taking action to fix the State's budget deficit for the current fiscal year. I know that every page of the Recall Petition that references Senator Wirch's refusal to represent the citizens of his district was prepared, circulated and signed by the individual signers during the months of February, March and April 2011.

7. Senator Wirch has challenged a number of signatures on the Recall Petition as being invalid because the respective signers failed to include the year when they dated their signatures. I have reviewed the individual signatures listed on the attached Exhibit A and the respective petition pages. I recognize the form of petition page for each such signature as being one of the petition pages that was created during February – April 2011 and therefore I know that each of the referenced signatures was signed during 2011.

8. Senator Wirch has also challenged a number of signatures on the Recall Petition as being invalid because the respective circulators failed to include their municipality of residence, including those circulators listed on the attached Exhibit B. I am familiar with those circulators and know that their respective municipalities of residence are as reflected on Exhibit B.

9. Senator Wirch has exhibited either a fundamental lack of knowledge of or total disregard for the individual municipalities that electors in his district reside in by challenging as invalid those circulator certifications listed on the attached Exhibit C. Those circulator certifications identify both a mailing address and a separate municipality of residence, in instances where the municipality of residence does not have a separate post office. I am familiar with the municipalities listed in the "Municipality" column of Exhibit C and know that residents of those municipalities utilize the respective cities and zip codes in their mailing addresses.

10. The purpose of this affidavit is to provide the Government Accountability Board with information identifying the information referenced above, as such information was either missing or unclear from the Recall Petition and/or has been challenged by Senator Wirch.

Erin M. Decker
Erin M. Decker

May 12, 2011
Date

This instrument was acknowledged before
me on 5/12, 2011 by
Erin M. Decker.

Tanya L. Rodriguez
Signature
Name: Tanya L. Rodriguez
Notary Public, State of: WI
My Commission Expires: 2-12-12

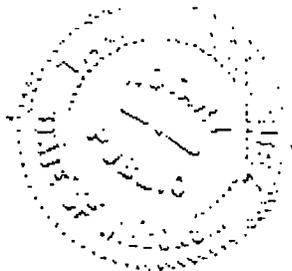


Exhibit A

SIGNATORY NAME	PETITION DATE	CIRCULATOR DATE	ERROR NUMBER	PAGE NUMBER
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Challenge: Individual Signer Failed to Provide a Year

Jose Vagrible	4075 28th Ave	Kenosha	67	2122
?	6515 6th Ave	Kenosha	102	2411
			27	2006
			28	2006
			29	2006
			30	2006
			31	2006
			32	2006
			34	2013
M H			35	2013
M H				

Exhibit B

Exhibit C

Last Name	First Name	Address	City	State	Municipality	Page No.
Young	Michael A.	12002 223rd Ave.	Bristol	WI	Salem	651
Papendick	Michael	21901 60th Place	Bristol	WI	Salem	1417
Bentzler	Mark	W993 Ski Hill Dr.	Burlington	WI	Town of Spring Prairie	1576
Proko	Kathleen	4727 352nd Ave	Burlington	WI	Wheatland	1200
Poelman	Dona	2935 Forest View Circle	Franksville	WI	Yorkville	30
Fleck	Henry	21925 Schroeder Rd.	Kansasville	WI	Brighton	922
Hauser	Lynn M.	1445 240th Ave.	Kansasville	WI	Brighton	1027
LaRocque	Jessica	24906 Hiawatha Drive	Kansasville	WI	Town of Dover	38
LaRocque	Jessica	24906 Hiawatha Drive	Kansasville	WI	Town of Dover	39
LaRocque	Jessica	24906 Hiawatha Drive	Kansasville	WI	Town of Dover	40
Brehn	Brian	13610 91st Street	Kenosha	WI	Bristol	91
Govea	Susan	15510 38th St	Kenosha	WI	Paris	19
Govea	Susan	15510 38th St	Kenosha	WI	Paris	50
Govea	Susan	15510 38th St	Kenosha	WI	Paris	68
Govea	Susan	15510 38th St	Kenosha	WI	Paris	69
Govea	Susan	15510 38th St	Kenosha	WI	Paris	70
Govea	Susan	15510 38th St	Kenosha	WI	Paris	71
Govea	Susan	15510 38th St	Kenosha	WI	Paris	72
Govea	Susan	15510 38th St	Kenosha	WI	Paris	73
Govea	Susan	15510 38th St	Kenosha	WI	Paris	74
Govea	Susan	15510 38th St	Kenosha	WI	Paris	75
Govea	Susan	15510 38th St	Kenosha	WI	Paris	77
Govea	Susan	15510 38th St	Kenosha	WI	Paris	78
Govea	Susan	15510 38th St	Kenosha	WI	Paris	79
Govea	Susan	15510 38th St	Kenosha	WI	Paris	80
Govea	Susan	15510 38th St	Kenosha	WI	Paris	89
Govea	Susan	15510 38th St	Kenosha	WI	Paris	90
Poisl	Patrick	3810 176th Av	Kenosha	WI	Paris	630
Poisl	Patrick	3810 176th Av	Kenosha	WI	Paris	639
Poisl	Patrick	3810 176th Av.	Kenosha	WI	Paris	645
Poisl	Patrick	3810 176th Av.	Kenosha	WI	Paris	1867
Poisl	Patrick	3810 176th Av.	Kenosha	WI	Paris	1868
Poisl	Patrick	3810 176th Av.	Kenosha	WI	Paris	1869
Swanson	Jeffrey W.	3901 Prairie Village Drive	Kenosha	WI	Pleasant Prairie	195
Molinari	Charlie	4909 Harrison Road	Kenosha	WI	Pleasant Prairie	400
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	746

Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	747
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	751
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	753
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	839
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	840
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1032
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1033
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1034
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1052
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1060
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1066
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1111
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1113
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1114
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1115
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1116
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1140
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1141
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1142
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1208
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1209
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1274
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1279
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1280
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1283
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1284
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1305
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1383
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1384
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1385
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1558
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1559
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1602
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1603
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1604
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1706
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1736

Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1737
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1738
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1739
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1743
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1744
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1745
Prijic	John H.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1746
Prijic	Deborah A.	4816 84th Street	Kenosha	WI	Pleasant Prairie	1819
Prijic	Marilyn	9038 24th Ave.	Kenosha	WI	Pleasant Prairie	1834
Knight	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	5
Tamayo	Jason	1280 Village Centre Dr. #6	Kenosha	WI	Somers	23
Myres	Jon E.	2425 11th Street	Kenosha	WI	Somers	102
Buckingham	Daniel P.	1419 94th Avenue	Kenosha	WI	Somers	115
Krueger	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	321
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	341
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	342
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	355
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	363
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	379
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	380
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	381
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	382
Skalitzky	Michael	1415 97th Avenue	Kenosha	WI	Somers	383
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	385
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	386
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	455
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	1312
Rondon	Frank	6223 63rd St	Kenosha	WI	Somers	1349
Hughes	Irvin L.	1650 72nd Ave	Kenosha	WI	Somers	1352
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	1387
Tamayo	Joshua R.	1138 87th Ave Apt. 12	Kenosha	WI	Somers	1761
Loewen	Pete	4305 4th St.	Kenosha	WI	Town of Somers	492
Jensen	Carrie	4773 84th St	Kenosha	WI	Village of Pleasant Prairie	108
Starzyk	Mark A.	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	149
Starzyk	Mark A.	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	150
Starzyk	Mark A.	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	551
Starzyk	Mark	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	1429

Starzyk	Mark	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	1837
Starzyk	Mark	39405 92nd PI PO Box 156	Powers Lake	WI	Randall	1924
Pelz	Mark	39520 91st St.	Powers Lake	WI	Town of Randall	139
Cesarini (?)	Daniel	109 8th Court	Racine	WI	Somers	1493
Seward	Daniel K.	26141 52nd St	Salem	WI	Brighton	876
Grossman	Michael	25537 52nd St.	Salem	WI	Brighton	1437
Blount	Paul	24604 74th St.	Salem	WI	Paddock Lake	599
Poole	Carolyn K.	6245 237th Ave	Salem	WI	Paddock Lake	1263
Poole	John K.	6245 237th Ave	Salem	WI	Paddock Lake	1264
Poole	Carolyn K.	6245 237th Ave	Salem	WI	Paddock Lake	1266
Roach	Doris	25166 72nd St #126	Salem	WI	Paddock Lake	1463
Haynes	Marvin	24606 67th St.	Salem	WI	Paddock Lake	1832
Cleveland	Phillip	11515 1st St. Lot 143	Sturtevant	WI	Somers	1649
Rogers	Al	26730 104 Street	Trevor	WI	Salem	119
Parker	Marilyn M.	26210 103rd St.	Trevor	WI	Salem	158
McNamara	Teri	23620 111 St	Trevor	WI	Salem	641
Kane	Ronald F.	25355 Runyard Way West	Trevor	WI	Salem	643
Kmieciak	John J.	26925 98th St	Trevor	WI	Salem	662
Schwaderer	Darwin	23515 11th Street	Trevor	WI	Salem	665
Voight	Jody	24908 125th Street	Trevor	WI	Salem	669
Meyer	Linda J.	27501 101st St	Trevor	WI	Salem	786
Henry	John P.	24935 125th St	Trevor	WI	Salem	791
Pogachar	Gary	9840 272nd Ave	Trevor	WI	Salem	803
Myers-Witkowski	Geraldine E.	27065 101st	Trevor	WI	Salem	1099
Lasch	Robert Allen	26723 105th St.	Trevor	WI	Salem	1716
Lasch	Darlene	26723 105th St.	Trevor	WI	Salem	1717
Kean	Bernard J.	23611 127th St.	Trevor	WI	Salem	1779
Kean	Bernard J.	23611 127th St.	Trevor	WI	Salem	1780
Kean	Bernard J.	23611 127th St.	Trevor	WI	Salem	1781
Kean	Bernard J.	23611 127th St.	Trevor	WI	Salem	1783
Parker	Marilyn	26210 103rd St.	Trevor	WI	Salem	1785
Parker	Marilyn	26210 103rd St.	Trevor	WI	Salem	1786
Parker	Marilyn	26210 103rd St.	Trevor	WI	Salem	1787
Meissner	Rebecca	24927 113th Street	Trevor	WI	Salem Township	923
Dziki	Philip J.	29920 102nd St.	Trevor	WI	Town of Salem	1788
Hull	Kathleen	23705 112th Street	Trevor	WI	Township of Salem	917
Stobaugh	David W.	9130 368th Ave	Twin Lakes	WI	Town of Randall	190

Poisl

William J. Jr 1413 172nd Ave

Union Grove

WI

Paris

1964

Decker Exh. C