

6. On information and belief, Naomi Cobb has not filed a registration statement with the Government Accountability Board pursuant to Wis. Stat. § 11.05(2).

7. On information and belief, Naomi Cobb has not filed a registration statement with the Government Accountability Board pursuant to Wis. Stat. § 11.05(1).

8. The Recall Petition is invalid because the petitioner, Naomi Cobb, did not first file a registration statement as required by Wis. Stat. § 9.10(2)(d). As described further in the attached Memorandum of Law in support of this challenge, the Government Accountability Board must find the Recall Petition is insufficient because of this fatal defect.

9. On information and belief, at least one Recall Petition circulator misrepresented the purpose of the petition, as evidenced by the Affidavit of Walter Dyer, attached hereto. Pursuant to Wis. Stat. § 9.10(2)(m), Mr. Dyer's signature on the Recall Petition may not be counted.

10. On information and belief, the Recall Petition includes the following irregularities, which are supported by the Affidavit of John W. Hogan, attached hereto:

a. Recall Petition page 3780 seeks the recall of Senator Sheila Harsdorf and may not be considered as part of the Recall Petition.

b. At least 279 signatories to the Recall Petition did not date their signatures. Pursuant to Wis. Stat. § 9.10(2)(e)1., these signatures may not be counted.

c. At least twenty-nine signatories signed the Recall Petition outside the purported circulation period. Pursuant to Wis. Stat. § 9.10(2)(e)2., these signatures may not be counted.

d. At least twenty signatories signed the Recall Petition subsequent to the respective circulator's certification. Pursuant to Wis. Stat. § 9.10(2)(e)3., these signatures may not be counted.

e. The residency of at least 590 signatories to the Recall Petition cannot be determined by the address given. Pursuant to Wis. Stat. § 9.10(2)(e)4., these signatures may not be counted.

f. At least 3,462 signatories to the Recall Petition reside outside of the 8th Senate District. Pursuant to Wis. Stat. § 9.10(2)(e)5., these signatures may not be counted.

g. At least ten signatories are not qualified electors, as their names appear on the Ineligible Voter List provided by the Government Accountability Board. Pursuant to Wis. Stat. § 9.10(2)(e)8., these signatures may not be counted.

h. At least 200 signatories signed the Recall Petition twice and ten signatories signed the Recall Petition three times. Pursuant to Wis. Stat. § 9.10(2)(i), these signatures may not be counted.

i. At least 140 Recall Petition pages, collectively containing 741 individual signatures, were not properly certified by the circulator. Pursuant to Wis. Stat. §§ 8.40(2) and 9.10(2)(em), these signatures may not be counted.

j. At least twelve signatories did not sign the Recall Petition.

k. The status of at least 204 signatories as qualified electors of the 8th Senate District cannot be verified because their names are either missing or illegible. These signatures may not be counted in determining whether the Recall Petition contains the requisite number of electors pursuant to Wis. Stat. § 9.10(1)(b).

1. At least six signatures may not be counted because multiple signatures appear in the same handwriting. Pursuant to Wis. Stat. § 9.10(2)(e)1., (e)4. and (j), these signatures may not be counted.

11. Given the above-referenced insufficiencies, there is reason to believe that additional evidence of irregularities regarding the signatures on the Recall Petition will be discovered and the Government Accountability Board should conduct a thorough review of the Recall Petition as required under Wis. Stat. § 9.10(3)(b).

12. For the foregoing reasons, the Recall Petition fails to meet the mandatory standards outlined in Wis. Stat. § 9.10 and is insufficient.

I, Alberta Darling, being first duly sworn upon oath, state that I personally read the above written challenge and that the above allegations are true and correct based on my personal knowledge and, as to those allegations stated on information and belief, I believe them to be true.

Dated this 5 day of May, 2011.



Alberta Darling

Subscribed and sworn to before me this
5th day of May, 2011.



Notary Public/State of Wisconsin
My Commission: 2-5-12 expires