

STATE OF WISCONSIN
BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

IN RE PETITION TO RECALL
LIEUTENANT GOVERNOR REBECCA KLEEFISCH

**SWORN WRITTEN CHALLENGE OF LIEUTENANT GOVERNOR REBECCA
KLEEFISCH**

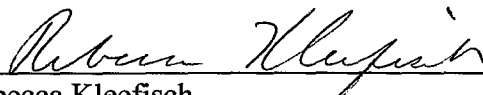
STATE OF WISCONSIN)
) ss.
COUNTY OF WAUKESHA)

REBECCA KLEEFISCH, being first duly sworn, states as follows:

1. I am the Lieutenant Governor of the State of Wisconsin; a resident of Oconomowoc, Wisconsin; and the subject of recall petitions released to my representatives by the Government Accountability Board (GAB) on February 3, 2012.

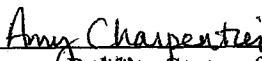
2. Pursuant to Wisconsin Statute section 9.10(3)(b), I hereby authorize and incorporate herein the written challenges submitted by my representatives with this affidavit.

Dated this 29 day of February, 2012.

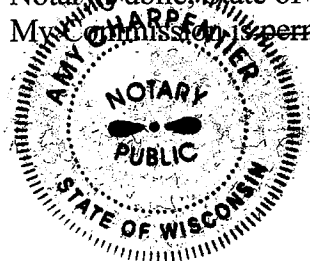


Rebecca Kleefisch

Subscribed and sworn to before me this
29th day of February, 2012.



Notary Public, State of Wisconsin
My Commission Expires permanent 11/11/2012



STATE OF WISCONSIN
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**WRITTEN SUBMISSION/CHALLENGES ON BEHALF OF
LIEUTENANT GOVERNOR REBECCA KLEEFISCH**

1. On February 3, 2012, representatives for Lieutenant Governor Rebecca Kleefisch received from the Government Accountability Board (GAB) a copy of a recall petition relating to the Lt. Governor. The GAB indicated the Recall Petition includes approximately 128,000 separate pages and approximately 845,000 signatures.

2. Immediately thereafter, representatives of Lieutenant Governor Kleefisch, as well as more than 3,000 volunteers, began a review of the Petition.

3. On January 25, 2012, a Dane County Circuit Court granted a request to extend the review period of the Petition. The court did so, giving Lt. Governor Kleefisch until March 5, 2012 within which to file written challenges to the GAB.

4. At a second hearing, on February 17, 2012, representatives of Governor Walker sought an additional two weeks within which to submit written challenges. The Governor's representatives argued that an additional two weeks were necessary to complete a review of the minimum number of signatures (540,208) required for a recall election. The Dane County Circuit Court denied the request for a further extension of time.

5. To date, representatives of Lt. Governor Kleefisch have been unable to complete a verification of the required minimum of 540,208 signatures. In fact, based upon the review to date, it is evident that no meaningful review will be completed by the March 5, 2012 deadline.

6. Accordingly, as a challenge to the Petition, Lt. Governor Kleefisch hereby demands that the GAB adhere to its prior public statements and the currently pending Order of Judge Mac Davis in *Friends of Scott Walker, et al. v. Wisconsin GAB et al.*, Case No. 11-CV-4195 (Waukesha County), requiring the GAB to take reasonable affirmative steps to: (a) identify and strike duplicative names; (2) identify and strike fictitious names; and (3) identify and strike names where GAB cannot determine that the signatory is a qualified elector, including where addresses and municipality cannot be determined.

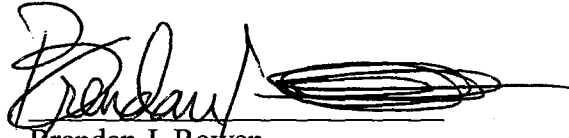
7. Such a continuing review is necessary and appropriate until such time (within the period permitted by statute and the court) as the GAB can attest that, under the “careful examination” standard of Wisconsin Statute section 9.10(3)(b), the minimum required number of signatures has either been verified or disqualified, such that the GAB can confidently determine whether the Recall election should be called.

8. In addition, on information and belief, two 501(c)(4) organizations, Wisconsin GrandSons of Liberty and We the People of the Republic (collectively, “Verify the Recall”), cooperated to organize and conduct a joint effort to verify the signatures on the Recall Petition (the “Citizen Verification Process”), which effort included the assistance of as many as 13,000 volunteers.

9. On information and belief, Verify the Recall will be making the results of the Citizen Verification Process publicly available. Insufficient time exists under the current permissible time frame work to evaluate this review process. Accordingly, as a separate written challenge to the Petition, Lt. Governor Kleefisch hereby incorporates and submits these third-party challenges.

10. Based upon the Court's description of the office holder's rights of challenge set forth in the previously referenced hearing of February 17, 2012, the Lt. Governor reserves the right to challenge signatures and circulator adherence to statutory requirements at future proceedings, including, but not limited to, a Writ of Mandamus.

Dated this 29th day of February, 2012, at Brookfield, Wisconsin.

A handwritten signature in black ink, appearing to read "Brendan J. Rowen", with a large, stylized flourish extending to the right.

Brendan J. Rowen
Smith, Gunderson & Rowen, SC
Counsel for Lieutenant Governor Rebecca
Kleefisch