

LEGISLATIVE REVIEW

A SNAPSHOT OF WHERE THE WISCONSIN LEGISLATURE STOOD ON WOMEN'S ISSUES IN THE 2005-06 LEGISLATIVE SESSION*

I. INTRODUCTION

This snapshot provides a snapshot of proposed, enacted, and failed legislation in Wisconsin during the 2005-06 legislative session that has an affect, or had the potential to affect, women because of their gender or sexual orientation. As it is a snapshot, it does not present a complete analysis of all such legislation that has impacted or had a potential to impact women in Wisconsin. Rather, various bills are identified for the purpose of illustrating some of the activity occurring in Wisconsin, noting some of the most contentious bills raised within the last session. Key events included the Wisconsin Legislature's approval of a ballot measure asking Wisconsin voters to amend the state Constitution to define marriage as between a man and a woman.¹ Wisconsin Governor, Jim Doyle, also vetoed several bills, including bills that dealt with the concealment of firearms,² the type of information a woman must receive prior to receiving an abortion,³ and the circumstances under which a health care provider may refuse to provide certain medical procedures based on moral or religious convictions.⁴

II. LEGISLATION IMPACTING VIOLENCE AGAINST WOMEN

For the second time in his term, the Governor vetoed a bill which would have created a procedure by which a person may apply for a license to carry a concealed weapon in most places.⁵ Governor Doyle, in his veto statement noted the overwhelming opposition of the state's law enforcement officials to the bill, as well as several specific con-

* Information for this snapshot was compiled by Melanie Cairns, Amy Bradshaw, and Diana Aguilar, all members of the *Wisconsin Women's Law Journal* 2005-06 Senior Editorial Board.

1. Assemb. J. Res. 67, 2005-06 Leg., 97th Sess. (Wis. 2005); S. J. Res. 53, 2005-06 Leg., 97th Sess. (Wis. 2005).

2. S.B. 403, 2005-06 Leg., 97th Sess. (Wis. 2005).

3. S.B. 138, 2005-06 Leg., 97th Sess. (Wis. 2005); Assemb. B. 321, 2005-06 Leg., 97th Sess. (Wis. 2005).

4. Assemb. B. 343, 2005-06 Leg., 97th Sess. (Wis. 2005).

5. S.B. 403, 2005-06 Leg., 97th Sess. (Wis. 2005); Steven Walters, *Conceal-Carry Bill Back to Governor*, MILWAUKEE J. SENTINEL, Jan. 18, 2006, at A News 1.

cerns with the measure.⁶ Of particular concern for women, some critics argued that the bill would negatively affect women's health and reproductive rights because it would allow individuals to carry concealed weapons into health care centers, putting patients and staff in danger.⁷ The veto was overridden in the Senate,⁸ but stood by a slim two-vote margin in the Assembly.⁹

The table below lists three pieces of legislation signed by the Governor, which altered the Criminal Code in the Wisconsin Statutes.

Proposed Bill	Description	Effective Date
Act 276 (Assembly Bill 47) ¹⁰	Eliminates the limitations period (and all related exceptions) for prosecutions for first-degree sexual assault and sexual assault of a child who is less than thirteen-years-old. ¹¹ Previously, the state could commence prosecution for some serious crimes against children ¹² any time before the victim reached forty-five years of age. In addition, the deadline for commencing a prosecution in a first-degree or second-degree sexual assault case or a sexual assault of a child case did not apply if, before the deadline, the state collected DNA evidence, and analysis of the DNA after the deadline resulted in a probable identification of the perpetrator; the state was allowed to prosecute that person within twelve months of the analysis. Under Assembly Bill 47, prosecution for these crimes may begin at any time.	April 20, 2006 ¹³

6. Letter from Jim Doyle, Governor, to the Wisconsin Senate (Jan. 20, 2006), available at <http://www.wisgov.state.wi.us/docview.asp?docid=5853>.

7. Memorandum from Planned Parenthood of Wisconsin to all Wisconsin State Legislators on the Community Endangerment Act, available at <http://www.ppw.org/media/PA/Bills/ConcealWeapons.htm> (last visited May 16, 2006) ("Without a comprehensive health care facilities exemption, the safety and well-being of patients and staff at 28 Planned Parenthood family planning facilities are put at great risk by SB 403.")

8. See Anita Weier, *Gun Bill Flaws Swung Vote, 2 Dems Say*, CAP. TIMES (Madison, Wis.) Feb. 1, 2006, at A1.

9. *Id.*

10. Assemb. B. 47, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 276).

11. The limitations period must not have already expired. *Id.*

12. Such as sexual assault of a child, repeated acts of sexual assault of a child, incest with a child, sexual exploitation of a child, and certain kinds of physical abuse of a child. *Id.*

13. *Id.*

Act 104 (Assembly Bill 436) ¹⁴	Expands the mandatory arrest requirements for domestic abuse calls to include situations where the officer had a reasonable basis for believing that the person is the predominant aggressor. ¹⁵ The Act defines "predominant aggressor" as "the most significant, but not necessarily the first, aggressor in a domestic abuse incident." ¹⁶	April 1, 2006. ¹⁷
Act 272 (Assembly Bill 636) ¹⁸	Expands the definition of "harassment" for purposes of a restraining order to include "engaging in an act that would constitute abuse ¹⁹ , . . . sexual assault ²⁰ , . . . or stalking. ²¹ " ²² In addition, the Act lengthened the time a temporary restraining order may be in effect to fourteen days. ²³ The Act also expands the circumstances under which there is no charge for filing a restraining order, and extends the amount of time that a harassment restraining order may remain in effect from two years to four years. ²⁴	April 20, 2006. ²⁵

14. Assemb. B. 436, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 104).

15. *Id.*

16. *Id.* A law enforcement officer must consider all of the following in identifying the predominant aggressor: the history of domestic abuse between the parties, if it can be reasonably ascertained by the officer, and any information provided by witnesses regarding that history; statements made by witnesses; the relative degree of injury inflicted on the parties; the extent to which each person present appears to fear any party; whether any party is threatening or has threatened future harm against another party or another family or household member; and whether either party acted in self-defense or in defense of any other person. *Id.* The Act also addressed the release on bail of persons arrested for domestic abuse incidents and made changes to the requirements for a law enforcement agency's written policies regarding domestic abuse arrest incidents. *Id.*

17. *Id.*

18. Assemb. B. 636, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 272).

19. Abuse is defined under section 48.02(1) of the Wisconsin Statutes. Wis. STAT. § 48.02(1) (2003-2004).

20. Sexual Assault is defined under section 940.225 of the Wisconsin Statutes, which deals with first-, second-, third-degree sexual assault. Wis. STAT. § 940.225 (2003-2004).

21. Stalking is defined under section 940.32 of the Wisconsin Statutes. Wis. STAT. § 940.32 (2003-2004).

22. Assemb. B. 436, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 104).

23. *Id.*

24. *Id.*

25. *Id.*

Act 271 (Assembly Bill 708) ²⁶	Allows certain repeat sex offenders to be sentenced to life imprisonment. According to the Act, "if a person has one or more prior convictions for [first-degree sexual assault] or for a comparable crime under federal law or the law of any state and subsequently is convicted of [first-degree sexual assault], the maximum term of imprisonment . . . is life imprisonment without the possibility of parole or extended supervision." ²⁷	April 20, 2006. ²⁸
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III. LEGISLATION IMPACTING WOMEN'S ECONOMIC SECURITY

Legislation impacting women's economic security can take many forms, including revisions to public programs or mandates that apply to employers. Economic security for women in Wisconsin is exceptionally important considering that nearly sixty-five percent of minimum wage workers are women.²⁹ Within the last session Governor Doyle provided some relief to all minimum wage workers, when he raised the hourly minimum wage from \$5.15 to \$5.70, effective June 1, 2005, and raised the wage to \$6.50 on June 1, 2006.³⁰ As part of his agreement with the legislature to raise the minimum wage, Governor Doyle also signed Act 12 (Assembly Bill 49), which requires the state minimum wage law to be construed as an enactment of statewide concern.³¹ Thus, Act 12 preempts local living wage ordinances, such as those passed in Madison,³² except certain ordinances relating to public work and public employees.³³

26. Assemb. B. 708, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 271).

27. *Id.* First-degree sexual assault is defined in section 940.225(1) of the Wisconsin Statutes. Wis. STAT. § 940.225(1) (2003-2004).

28. Assemb. B. 708, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 271);

29. John Finerty, *Wisconsin raises the minimum wage as of June 1, 2005*, Wis. L. J., June 8, 2005.

30. Press Release, Governor Jim Doyle, Governor Doyle Announces Increase in Statewide Minimum Wage, (June 1, 2006), available at http://www.wisgov.state.wi.us/journal_media_detail.asp?prid=1148.

31. Assemb. B. 49, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 12); see also Finerty, *supra* note 29.

32. Finerty, *supra* note 29.

33. Assemb. B. 49, 2005-06 Leg., 97th Sess. (Wis. 2005) (enacted as Act 12).

A number of other bills fell short of enactment but are worthy of mention; they are listed in the table below.

Proposed Bill	Description	Status
Assembly Bill 751 ³⁴	Proposed that in a judgment or order determining paternity the court must establish the amount of the father's obligation to pay or contribute to expenses of the mother's pregnancy and the child's birth, and that, if the court does not require periodic payments because the father does not have the present ability to pay, the court may modify the judgment or order at a later date to require periodic payments if the father has the ability to pay at that time. ³⁵ The bill also requires consideration of the obligor's ability to pay during a tax refund intercept hearing. ³⁶	Passed the Assembly by a voice vote, but failed to pass pursuant to a Senate joint resolution. ³⁷
Assembly Bill 406/ Senate Bill 195 ³⁸	Sought to authorize the circuit court to order a person who engages in discrimination in employment to pay compensatory and punitive damages and a surcharge. The bill also directed the Secretary of Workforce Development to appoint a committee to study wage disparities between men and women and between minority group members and nonminority group members. ³⁹	The bills languished in Assembly Committee and Senate Committee, respectively. ⁴⁰

34. Assemb. B. 751, 2005-06 Leg., 97th Sess. (Wis. 2005).

35. *Id.*

36. *Id.* The proposed bill was based on a Wisconsin Court of Appeals decision, Rusk County Department of Health and Human Service v. Thorson, 693 N.W.2d 318 (2005). Assemb. B. 751, 2005-06 Leg., 97th Sess. (Wis. 2005).

37. *Id.*; History of Assembly Bill 751, <http://www.legis.state.wi.us/2005/data/AB751hst.html> (last visited May 16, 2006).

38. Assemb. B. 406, 2005-06 Leg., 97th Sess. (Wis. 2005); S.B. 195, 2005-06 Leg., 97th Sess. (Wis. 2005).

39. *Id.*

40. *Id.*; History of Assembly Bill 406, <http://www.legis.state.wi.us/2005/data/AB406hst.html> (last visited May 16, 2006); History of Senate Bill 195, <http://www.legis.state.wi.us/2005/data/SB195hst.html> (last visited May 16, 2006).

Assembly Bill 754 ⁴¹	Sought to require a Wisconsin Works grant recipient who is a custodial parent with an infant to attend parenting skills training and to meet with a financial and employment planner. ⁴²	The bill did not advance out of Assembly Committee. ⁴³
Assembly Bill 529 ⁴⁴	Proposed to revise requirements for ordering maintenance (formerly known as alimony). ⁴⁵ For example, the bill would have limited the length of maintenance to the shortest time necessary for the payee to become employed at a level that provides for minimal, reasonable needs, but not more than three years, with exceptions for disability and repayment if the payee funded the payor's education. ⁴⁶	The bill did not advance out of Assembly Committee. ⁴⁷
Assembly Bill 654 ⁴⁸	Sought to require that in determining child support the court must consider the resulting disparity in the parties' incomes and resources and, if the payer's income and resources are lower than the payee's, whether application of the percentage standard would create substantially disparate standards of living between the parties. ⁴⁹	The bill was reported out of its assigned Assembly Committee but stalled in the Assembly Rules Committee. ⁵⁰

41. Assemb. B. 754, 2005-06 Leg., 97th Sess. (Wis. 2005).

42. *Id.*

43. *Id.*; History of Assembly Bill 754, <http://www.legis.state.wi.us/2005/data/AB754hst.html> (last visited May 16, 2006).

44. Assemb. B. 529, 2005-06 Leg., 97th Sess. (Wis. 2005).

45. *Id.*

46. *Id.*

47. Assemb. B. 529, 2005-06 Leg., 97th Sess. (Wis. 2005); History of Assembly Bill 529, <http://www.legis.state.wi.us/2005/data/AB539hst.html> (last visited May 16, 2006).

48. Assemb. B. 654, 2005-06 Leg., 97th Sess. (Wis. 2005).

49. *Id.* This addition was intended to address the decision in *Luciani v. Montemurro-Luciani*, 199 Wis. 2d 280, 544 N.W. 2d 561 (1996), where a parent was ordered to pay child support in the amount determined by using a percentage standard without any modification based on the payee's significantly higher income. *Id.*

50. *Id.*; History of Assembly Bill 654, <http://www.legis.state.wi.us/2005/data/AB654hst.html> (last visited May 16, 2006).

IV. SEXUALITY AND FAMILY RIGHTS

A. Same-Sex Marriage

A referendum to ban same-sex marriage will be on the ballot in November 2006. The proposed amendment to the Wisconsin Constitution would create Section 13 of Article XIII providing that "only a marriage between one man and one woman shall be valid or recognized as a marriage in this state."⁵¹ If the amendment is passed, Section 13 would additionally prevent legal recognition of a "legal status identical or substantially similar to that of marriage" for unmarried individuals.⁵²

For the amendment to take effect, it must be approved by a majority of Wisconsin voters.⁵³ Support in the legislature fell along party lines, with nineteen Republicans in the Senate voting for the amendment and fourteen Senate Democrats opposing it.⁵⁴ In the Assembly, six Democrats joined Republicans in supporting the amendment; only one Republican opposed the amendment.⁵⁵ During the legislative debate, supporters "said it was important that voters—not the courts—decide how to define marriage in Wisconsin." Opponents "called the amendment a political ploy to drive up election turnout among Republican voters" in a year when the Democrat Governor and Attorney General are up for re-election.⁵⁶ Although measures similar to the proposed amendment have passed in all fifteen states where they have been proposed, opponents of the Wisconsin proposal plan to appeal to voters' sense of fairness in asking them to vote "no" on the amendment.⁵⁷

In response to the proposed amendment, two different bills were proposed in the Assembly that would create legal protection for same-sex couples in Wisconsin.⁵⁸ Similar to the same-sex marriage ban, Assembly Bill 503 would have defined marriage as between one man and one woman.⁵⁹ However, the bill would have also established domestic partnerships, defined the rights and responsibilities of registered domestic partners, and provided insurance coverage for domestic partners of University of Wisconsin employees.⁶⁰ Other than completion

51. Assemb. J. Res. 67, 2005-06 Leg., 97th Sess. (Wis. 2005); S. J. Res. 53, 2005-06 Leg., 97th Sess. (Wis. 2005).

52. S. J. Res. 53.

53. Wis. Leg. Reference Bureau, STATE OF WISCONSIN 2005-2006 BLUE BOOK 887 (2005).

54. Stacy Forster, *Referendum on Gay Marriage Ban; State Senate Passes Amendment; It Could Be A Factor For Doyle in '06*, MILWAUKEE J. SENTINEL, Dec. 8, 2005, at A News 1.

55. Stacy Forster, *Same-Sex Marriage Goes to Voters*, MILWAUKEE J. SENTINEL, Mar. 1, 2006, at A News 1.

56. *Id.*

57. *Id.*

58. Assemb. B. 503, 2005-06 Leg., 97th Sess. (Wis. 2005); Assemb. B. 824, 2005-06 Leg., 97th Sess. (Wis. 2005).

59. Assemb. B. 503.

60. *Id.*

of fiscal estimates and a referral to the committee on insurance, no action was taken on this bill after it was proposed in June of 2005.⁶¹

Similarly, Assembly Bill 824 would have established domestic partnerships in Wisconsin.⁶² This bill would have set forth the requirements for forming a domestic partnership and the procedure for applying for a declaration of domestic partnership in detail.⁶³ The bill would also have provided that any statute or law applicable to a married person or a formerly married person would also apply to a person who is a domestic partner or was formerly a domestic partner.⁶⁴ Unlike Assembly Bill 503, this bill did not specifically address insurance coverage for domestic partners of state employees, nor did it define marriage as only between one man and one woman.⁶⁵ The bill failed to pass pursuant to a Senate joint resolution.⁶⁶

B. Reproductive Rights

During 2005, Governor Doyle vetoed several bills passed by the Wisconsin Legislature that would have restricted women's reproductive right. However, Senate Bill 286, dealing with sex education, was recently signed into law by Governor Doyle, against the urging of reproductive rights groups in Wisconsin to veto the bill.⁶⁷ The bill requires school districts to offer human growth and development programs to present abstinence from sexual activity as the preferred choice of behavior in relationship to all sexual activity for unmarried pupils, devote more attention to abstinence from sexual activity than to any other behavior.⁶⁸ In addition, the bill requires those school districts to emphasize that abstinence from sexual activity before marriage is the most effective way to prevent pregnancy and sexually transmitted diseases, including human immunodeficiency virus and acquired immunodeficiency syndrome.⁶⁹ The bill passed the Senate by a vote of 24-9, and the Assembly concurred in it by a voice vote.⁷⁰

61. History of Assembly Bill 503, <http://www.legis.state.wi.us/2005/data/AB503hst.html> (last visited May 16, 2006).

62. Assemb. B. 824.

63. *Id.*

64. *Id.*

65. *Id.*

66. History of Assembly Bill 824, <http://www.legis.state.wi.us/2005/data/AB824hst.html> (last visited May 16, 2006).

67. S.B. 286, 2005-06 Leg., 97th Sess. (Wis. 2005); Anne Babe, *House Passes Abstinence Bill*, THE BADGER HERALD (Madison, Wis.), available at http://badgerherald.com/news/2006/03/20/house_passes_abstine.php.

68. S.B. 286, 2005-06 Leg., 97th Sess. (Wis. 2005). Assembly Bill 690, proposing to require a greater variety of topics in school human growth and development programs, did not gain any momentum in the legislature. Assemb. B. 690, 2005-06 Leg., 97th Sess. (Wis. 2005); History of Assembly Bill 690, <http://www.legis.state.wi.us/2005/data/AB690hst.html> (last visited May 16, 2006).

69. S.B. 286, 2005-06 Leg., 97th Sess. (Wis. 2005).

70. History of Senate Bill 286, <http://www.legis.state.wi.us/2005/data/SB286hst.html> (last visited May 16, 2006).

Groups such as Planned Parenthood Advocates of Wisconsin and the National Abortion and Reproductive Rights Action League lobbied Governor Doyle to veto the bill, stating that it "ignores the reality of teenage sexual activity and denies individuals comprehensive information."⁷¹

The first vetoed bill, Senate Bill 138 and its counterpart Assembly Bill 321, would have amended Wisconsin's informed consent law by requiring modification of the materials distributed to women seeking to obtain an abortion if the probable gestational age is twenty weeks or older.⁷² Specifically, the bill would have required women seeking an abortion to receive information that a fetus twenty weeks or older is likely to experience pain during an abortion.⁷³ In his veto message, Governor Doyle wrote that he chose to veto the bill because it would interfere with the doctor-patient relationship and require that doctors communicate inconclusive information to patients.⁷⁴

The second bill vetoed by Governor Doyle in this area was Assembly Bill 207.⁷⁵ This bill would have expanded the circumstances under which a health care provider may refuse to provide certain medical procedures based on moral or religious convictions.⁷⁶ The bill would have applied specifically to procedures involving human embryos and fetal tissue or organs.⁷⁷ In his veto message, Governor Doyle faulted the measure for not requiring health care providers to give a referral to someone else if they object to a particular treatment and for not require them to disclose all treatment options.⁷⁸

71. Babe, *supra* note 67.

72. S.B. 138, 2005-06 Leg., 97th Sess. (Wis. 2005); Assemb. B. 321, 2005-06 Leg., 97th Sess. (Wis. 2005). Wisconsin's current voluntary and informed consent for abortions law delays the inducement of an abortion, except in an emergency, until twenty-four hours after a woman receives specific information both orally and in written format. Wis. STAT. § 253.10 (2003-2004).

73. S.B. 138, 2005-06 Leg., 97th Sess. (Wis. 2005); Assemb. B. 321, 2005-06 Leg., 97th Sess. (Wis. 2005). Under these bills, materials distributed to women twenty-four hours before obtaining an abortion would include the following three pieces of information:

1. The unborn child has the physical structures necessary to experience pain.
2. There is evidence that by 20 weeks' gestation, unborn children seek to evade certain stimuli in a manner that in an infant or an adult would be interpreted to be a response to pain.
3. There is evidence that the abortion methods most commonly used when an unborn child is at 20 weeks' gestation or older cause substantial pain to the unborn child.

Id.

74. Letter from Jim Doyle, Governor, to the Wisconsin Senate (Jan. 6, 2006), available at <http://www.wisgov.state.wi.us/docview.asp?docid=5754&locid=19>.

75. Assemb. B. 207, 2005-06 Leg., 97th Sess. (Wis. 2005).

76. Letter from Jim Doyle, Governor, to the Wisconsin Senate (Oct. 14, 2005), available at <http://www.wisgov.state.wi.us/docview.asp?docid=5111>.

77. *Id.*

78. *Id.*

Two other notable pieces of legislation passed the Assembly: Assembly Bill 343 and Assembly Bill 175.⁷⁹ Assembly Bill 343 would have prohibited the University of Wisconsin System from dispensing or prescribing post-coital emergency contraception to students or from advertising the availability of the medication.⁸⁰ Although the bill passed the Assembly 53-45, Republicans "broke ranks in unprecedented numbers" to oppose the bill.⁸¹ After reaching the Senate, it failed to pass pursuant to a joint resolution.⁸²

Among other provisions, Assembly Bill 175 would have eliminated the authority of an adult family member, a foster parent, a treatment foster parent, or a parent who does not have legal custody of an unemancipated minor to consent to an abortion for the minor; added formalities to the consent process; and eliminated the exception that allows a minor to bypass consent or judicial waiver requirements if a psychiatrist or psychologist states in writing that he or she believes that the minor is likely to commit suicide rather than seek consent or a judicial waiver.⁸³ The bill passed the Assembly 62-35.⁸⁴ Its companion, Senate Bill 97, was considered in committee but did not reach the Senate floor for a vote.⁸⁵

The following bills in the table below were introduced but did not advance out of committee in their chamber of origin.

Proposed Bill	Description
Assembly Bill 142 ⁸⁶ / Senate Bill 72 ⁸⁷	Sought to expand the prohibitions on payment of public funds to an organization that engages in abortion-related activities. ⁸⁸
Assembly Bill 285 ⁸⁹ / Senate Bill 155 ⁹⁰	Defining "employment discrimination based on creed" to include refusing to accommodate reasonably an employee's or prospective employee's religious observances or practices unless the employer can demonstrate that the accommodation would pose an undue hardship; expanding the definition of employment discrimination based on creed to include discriminating against a pharmacist on the basis of his or her refusal, based on creed, to dispense a prescribed drug or device that the pharmacist believes would be used for causing an abortion or causing the death of a persons. ⁹¹
Senate Bill 71 ⁹²	Sought to prohibit the recovery of damages from a person in a wrongful birth or wrongful life action if the damages resulted from a condition that existed at the time of the child's birth and the defendant's negligence contributed to the mother's decision not to undergo an abortion. ⁹³
Assembly Bill 305 ⁹⁴ / Senate Bill 166 ⁹⁵	Relating to requiring a hospital to provide to a sexual assault victim information and emergency contraception and providing a penalty. ⁹⁶

79. Assemb. B. 343, 2005-06 Leg., 97th Sess. (Wis. 2005); Assemb. B. 175, 2005-06 Leg., 97th Sess. (Wis. 2005).

80. Assemb. B. 343, 2005-06 Leg., 97th Sess. (Wis. 2005).

81. *UW Birth Control Ban*, THE ADVOCATE: A NEWSLETTER OF PLANNED PARENTHOOD ADVOCATES OF WISCONSIN (Planned Parenthood Advocates of Wis., Madison, Wis.), Summer 2005, at 6, available at <http://www.ppawi.org/media/PPAWI/Advocate/0705.pdf>.

82. History of Assembly Bill 343, <http://www.legis.state.wi.us/2005/data/AB343hst.html> (last visited May 16, 2006).

83. Assemb. B. 175, 2005-06 Leg., 97th Sess. (Wis. 2005).

84. History of Assembly Bill 175, <http://www.legis.state.wi.us/2005/data/AB175hst.html> (last visited May 16, 2006).

85. History of Senate Bill 97, <http://www.legis.state.wi.us/2005/data/SB97hst.html> (last visited May 16, 2006).

86. Assemb. B. 142, 2005-06 Leg., 97th Sess. (Wis. 2005).

87. S.B. 72, 2005-06 Leg., 97th Sess. (Wis. 2005).

88. Assemb. B. 142, 2005-06 Leg., 97th Sess. (Wis. 2005); S.B. 72, 2005-06 Leg., 97th Sess. (Wis. 2005).

89. Assemb. B. 285, 2005-06 Leg., 97th Sess. (Wis. 2005).

90. S.B. 155, 2005-06 Leg., 97th Sess. (Wis. 2005).

91. Assemb. B. 285, 2005-06 Leg., 97th Sess. (Wis. 2005); S.B. 155, 2005-06 Leg., 97th Sess. (Wis. 2005).

92. S.B. 71, 2005-06 Leg., 97th Sess. (Wis. 2005).

93. *Id.*

94. Assemb. B. 305, 2005-06 Leg., 97th Sess. (Wis. 2005).

95. S.B. 166, 2005-06 Leg., 97th Sess. (Wis. 2005).

96. Assemb. B. 305, 2005-06 Leg., 97th Sess. (Wis. 2005); S.B. 166, 2005-06 Leg., 97th Sess. (Wis. 2005).