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IN THE SUPREME COURT OF WISCONSIN**CLERK OF SUPREME COURT
OF WISCONSIN**

In the Matter of	)	
Petition to Amend	)	Rule Petition No. _____
Supreme Court Rule 40.04(1)(b)	)	Memorandum in Support

**MEMORANDUM IN SUPPORT OF PETITION TO AMEND SUPREME
COURT RULE 40.04(1)(b)**

Rebecca Clancy ("Petitioner") petitions the Supreme Court of Wisconsin to amend SCR 40.04(1)(b) to eliminate the requirement that an applicant who has received a degree from a law school whose graduates are eligible to take the bar examination of the jurisdiction in which the law school is located must first pass a bar examination and be admitted to practice in another state, territory, or the District of Columbia.

I. INTRODUCTION AND NATURE OF THE PROPOSED AMENDMENT

This petition seeks amendment of Supreme Court Rule 40.04(1)(b) governing the legal competence requirements applicable to graduates of law schools who are eligible to take the bar examination of the jurisdiction in which the law school is located.

The proposed amendment would eliminate the requirement that an applicant who otherwise satisfies SCR 40.04(1)(b) must first pass the bar examination of and be admitted to practice in another state, territory, or the District of Columbia before becoming eligible for admission by examination in Wisconsin.

The proposed amendment would not require the Wisconsin Supreme Court or the Board of Bar Examiners to approve or accredit any law school. Nor would it eliminate the educational prerequisite presently contained in SCR 40.04(1)(b). The rule would continue to require that the applicant receive a degree from a law school whose graduates are eligible to take the bar examination in the jurisdiction in which the law school is located. The proposed amendment merely removes the additional requirement of obtaining admission to practice law in another jurisdiction.

II. BACKGROUND AND HISTORY OF SCR 40.04(1)(b)

The present language of SCR 40.04(1)(b) arose from rulemaking proceedings conducted in 1997 and 1998 following a petition by the Massachusetts School of Law ("MSL") seeking an amendment to Wisconsin's bar-admission rules.¹

At that time, MSL sought a rule change that would permit its graduates to satisfy Wisconsin's legal-competence requirement without the ABA approval required. The focus of the proceedings was upon the qualifications of the institution and the means by which Wisconsin could assure the adequacy of an applicant's legal education without undertaking its own accreditation of non-ABA-approved law schools. The proceedings reflected concern that the Board of Bar Examiners should not be required to undertake the examination and certification of the curricula and educational programs of non-ABA-approved law schools. The rule ultimately adopted by the Court attempted to address that concern.²

The Court created an alternative pathway under which a graduate of a non-ABA-approved law school could satisfy Wisconsin's legal-competence requirement if graduates of that law school were eligible to take the bar examination in the jurisdiction in which the school was located and the applicant had passed a bar examination and been admitted to practice in another United States jurisdiction.³

Much of the advocacy during and following the 1997–98 proceeding concerned the qualifications of MSL. Subsequent correspondence supplied the Court with

¹ See Application and Petition of Massachusetts School of Law, *In re Amendment of Supreme Court Rules: SCR 40.04(1)—Law School Graduation Requirement for Bar Admission on Examination*, Rule Petition No. 97-09 (filed Feb. 14, 1997); Petition for Review, Rule Petition No. 97-09 (filed Apr. 25, 1997).

² See generally Supplementary Brief of Petitioner Regarding Accreditation, Rule Petition No. 97-09 (filed Oct. 16, 1997); Submission of Wisconsin Board of Bar Examiners, Rule Petition No. 97-09 (filed Oct. 20, 1997); Opposition of the American Bar Association to Proposed Rule Amendment, Rule Petition No. 97-09 (filed Oct. 20, 1997).

³ See *In re Amendment of Supreme Court Rules: SCR 40.04(1)—Law School Graduation Requirement for Bar Admission on Examination*, S. Ct. Order No. 97-09 (Wis. June 4, 1998) (amending SCR 40.04(1) to permit a graduate of a law school whose graduates are eligible to take the bar examination of the jurisdiction in which the school is located to satisfy the legal-competence requirement, provided the applicant has passed a bar examination and been admitted to practice in that or another United States jurisdiction).

information concerning the school's accreditation and the willingness of other jurisdictions to permit its graduates to sit for their bar examinations.⁴

This petition does not ask this Court to determine whether any particular non-ABA-approved law school provides an educational equivalent to that provided by an ABA-approved institution. Instead, it addresses one discrete component of the rule adopted in 1998: the requirement that an otherwise educationally eligible graduate first pass a bar examination and obtain admission to practice law in another jurisdiction before becoming eligible for admission by examination in Wisconsin.

The historical record provides context for the adoption of that requirement. The Court's 1998 order, however, does not address the regulatory function served by requiring admission to another jurisdiction—only the broader concern regarding educational sufficiency and the Court's reluctance to undertake institutional accreditation itself.⁵

This petition does not require the Court to address the questions that dominated the 1997–98 proceeding. It asks whether, 28 years later, the mechanism selected at that time remains necessary in light of substantial changes in legal education, the bar examination, interstate admission practices, future trends in licensure, and Wisconsin's own recent reconsideration of the manner in which legal competence should be demonstrated.

⁴ See, e.g., Letter from Attorney McCracken, Rule Petition No. 97-09 (filed Oct. 16, 1997); Letter from Minnesota Board of Law Examiners, Rule Petition No. 97-09 (filed Oct. 20, 1997); correspondence from North Dakota, Indiana, and Arkansas, Rule Petition No. 97-09 (filed Oct. 21, 1997); Letters from Attorney McCracken, Rule Petition No. 97-09 (filed Nov. 6, Nov. 14, and Nov. 25, 1997, and Apr. 6, 1998).

⁵ See S. Ct. Order No. 97-09, *supra* note 3. The order states that the Court considered the presentations made at the October 21, 1997 public hearing and the materials filed in the proceeding and then sets forth the amended rule. It does not separately identify any regulatory purpose served by requiring admission to another jurisdiction.

III. REASONS FOR THE PROPOSED AMENDMENT

A. Wisconsin Has Recently Reconsidered How Applicants Should Demonstrate Legal Competence.

The most immediate reason to reconsider SCR 40.04(1)(b) is Wisconsin's own recent restructuring of its bar-admission system.

In March 2026, this Court amended SCR 40.04 and SCR 40.14 to replace Wisconsin's state-specific bar examination with the Uniform Bar Examination beginning with the July 2026 administration. The Court also provided for Wisconsin to transition to the NextGen bar examination beginning in July 2028.⁶

These changes reflect Wisconsin's willingness to recognize equivalent demonstrations of legal competence rather than require their duplication. Wisconsin now permits an applicant who earns a qualifying UBE score in another jurisdiction to use that score in seeking admission in Wisconsin without sitting for an additional Wisconsin bar examination. A transferred score must satisfy Wisconsin's required passing score and the applicant must satisfy Wisconsin's remaining admission requirements, but Wisconsin no longer requires repetition of a general bar examination merely because the qualifying examination was taken elsewhere.

At the same time, Wisconsin has not abandoned its interest in ensuring that applicants are qualified to practice law in Wisconsin. Applicants seeking admission through the UBE, including applicants relying upon qualifying scores earned in another jurisdiction, must successfully complete twenty-one hours of a Wisconsin law and practice educational component.

The significance of these changes extends beyond the particular examination that Wisconsin administers. They reflect a regulatory approach that distinguishes among general legal competence, Wisconsin-specific preparation, educational eligibility, character and fitness, and the other qualifications necessary for admission. Where Wisconsin has identified a Wisconsin-specific educational need, it now addresses that need directly.

⁶ See In re Amendment of SCR 40.04 and 40.14 Relating to the Wisconsin Bar Examination, 2026 WI 9, Rule Petition No. 25-04 (Mar. 24, 2026) (amending SCR 40.04 and SCR 40.14 to adopt the UBE beginning in July 2026, authorize transfer of qualifying UBE scores, require a Wisconsin law and practice educational component, and provide for administration of the successor to the UBE beginning in July 2028).

The Court has also expressly connected these reforms with reducing unnecessary barriers to practice while maintaining appropriate professional standards and responding to Wisconsin's need to attract and retain qualified attorneys.⁷

These developments bear directly upon the continued justification for SCR 40.04(1)(b). The existing rule requires a particular class of graduates to do considerably more than demonstrate legal competence. It requires them to become licensed lawyers elsewhere before they may become eligible to seek admission in Wisconsin.

Wisconsin's recent reforms provide a reason to reconsider whether the additional requirement remains necessary. The Court has demonstrated that it can recognize portable evidence of general legal competence while separately imposing the Wisconsin-specific preparation and other requirements it considers necessary.

The same principle should inform reconsideration of SCR 40.04(1)(b). A requirement that an applicant obtain a professional license in another jurisdiction should be retained only if that additional license serves an identifiable regulatory function that Wisconsin's own admission requirements do not otherwise address – which it does not.

B. The Regulatory Landscape Governing Legal Education and Bar Admission Has Changed Materially Since 1998.

Wisconsin's recent reforms are part of a broader transformation in legal education and bar admission since SCR 40.04(1)(b) was adopted.

In 1998, ABA approval occupied a substantially more dominant position in determining whether a law school graduate could obtain access to bar examinations outside the jurisdiction in which the graduate attended law school. Interstate portability of bar-examination results was limited, distance legal education was in its infancy, and the methods now used to assess legal competence had not yet developed.

Legal education has changed substantially, including the development and acceptance of forms of distance and hybrid education that would have been unusual or unavailable when the present rule was adopted. The ABA itself has modified its standards concerning the manner in which accredited legal education may be delivered. States and policymakers have also increasingly considered

⁷ See Wisconsin Court System, *Wisconsin Supreme Court Adopts Uniform Bar Examination, Expands Path to Practice in State* (Mar. 24, 2026) (quoting Chief Justice Jill J. Karofsky that the change “reduces barriers to practice” while maintaining professional standards and responds to challenges in recruiting and retaining qualified attorneys).

alternative means of determining whether an applicant has received sufficient legal education to be permitted to demonstrate competence for admission.⁸

The bar examination has changed as well. The development of portable examination scores reflects a movement away from requiring applicants to demonstrate repeatedly the same general legal competence each time they seek admission in another jurisdiction. Wisconsin's adoption of the UBE in 2026 and its planned transition to NextGen in 2028 place Wisconsin abreast of that development.

The proposed amendment preserves the mechanism this Court itself selected in 1998 to avoid requiring Wisconsin to evaluate individual non-ABA-approved law schools. SCR 40.04(1)(b) does not make graduation from any non-ABA-approved law school sufficient. It requires graduation from a law school whose graduates are eligible to take the bar examination in the jurisdiction in which the school is located.

That requirement reflects an objective determination by the jurisdiction principally responsible for regulating entry into its own legal profession that graduates of the institution have received sufficient legal education to be permitted to demonstrate their competence for admission.

That determination need not bind Wisconsin as to the ultimate qualifications of any individual applicant. Nor must Wisconsin conclude that another jurisdiction's educational standards are identical to Wisconsin's. Rather, home jurisdiction bar eligibility provides an objective threshold for educational eligibility without requiring Wisconsin to undertake institution-by-institution accreditation of non-ABA-approved law schools. Wisconsin then remains free to determine whether the individual applicant satisfies Wisconsin's requirements for legal competence, character and fitness, knowledge of Wisconsin law and practice, and all other conditions of admission.

⁸ See, e.g., Ind. R. Admis. & Disc. Att'ys 13.1(1) (authorizing waiver of the ABA-law-school requirement when the Board of Law Examiners determines that a graduate of a non-ABA-approved United States law school is qualified through education or experience); Wash. State Bar Ass'n, *Admissions Policies* 10–11 (rev. May 1, 2026) (recognizing qualifying J.D. degrees from law schools approved or accredited by a state or territory); Supreme Court of Ohio, *Supreme Court Forges New Pathway for Legal Education and Law School Accreditation* (May 28, 2026) (announcing proposed amendments that would permit graduates of certain non-ABA-accredited law schools to qualify for the Ohio bar examination).

Of significance, this petition does not ask the Court to adopt that division of regulatory responsibility for the first time. The educational threshold is already part of SCR 40.04(1)(b). The proposed amendment leaves it intact.

To reiterate, what the amendment eliminates is a separate step: the requirement that, after satisfying the educational threshold, the graduate must obtain a license to practice law somewhere else before Wisconsin will permit the applicant to proceed through Wisconsin's admission process.

After nearly three decades of change in legal education and bar admission, that additional requirement warrants independent reconsideration rather than continuation solely because it formed part of the regulatory solution adopted in 1998.

C. The Prior-Admission Requirement Imposes Significant Burdens Without a Corresponding Regulatory Benefit.

SCR 40.04(1)(b) does more than require evidence concerning an applicant's legal education. It requires the applicant to become an attorney somewhere else before becoming eligible to seek admission in Wisconsin.

An applicant whose objective is to live and practice in Wisconsin must first identify another jurisdiction in which the applicant is eligible for examination, complete that jurisdiction's application process, pay its fees, satisfy its character-and-fitness requirements, travel to the jurisdiction, sit for and pass its examination, and complete whatever additional procedures are necessary for admission to its bar. Only then does the applicant satisfy the additional condition imposed by SCR 40.04(1)(b).

These requirements entail expense and delay. More importantly, they require an applicant to obtain a professional license from a jurisdiction in which the applicant may well have no intention of practicing.

The existence of a burden does not by itself justify changing an admission rule. The appropriate question is whether the additional burden imposed by prior out-of-state admission provides a corresponding regulatory benefit. The requirement can be examined according to what it actually establishes and accomplishes.

If the concern is adequate legal education, the existing jurisdictional requirement provides an objective external threshold—the applicant must graduate from a law school whose graduates are eligible to sit for the bar examination in the jurisdiction in which the school is located.

If the concern is general legal competence, Wisconsin has an examination and admission system designed to assess that competence which recognizes qualifying portable examination scores.

If the concern is knowledge of Wisconsin law and practice, Wisconsin has created a twenty-one-hour educational component.

What remains unidentified is the independent regulatory function served by requiring the applicant, in addition to these safeguards, to obtain a license to practice law in another jurisdiction.

D. The Proposed Amendment Would Not Open Wisconsin's Bar to an Unrestricted Class of Applicants or Lower Admission Standards.

A foreseeable concern with expanding any pathway to bar eligibility is that the change could result in an influx of applicants whose legal education or professional competence has not been adequately established.

The proposed amendment does not open Wisconsin's bar examination to anyone who has obtained a law degree from any institution. It preserves the educational limitation already contained in SCR 40.04(1)(b)—an applicant must have received a degree from a law school whose graduates are eligible to take the bar examination in the jurisdiction in which the law school is located.

Every applicant affected by the amendment would remain subject to Wisconsin's applicable requirements for legal competence, character and fitness, Wisconsin-specific legal preparation, and all other conditions of admission. The amendment therefore changes the point at which Wisconsin is willing to evaluate an applicant; it does not eliminate Wisconsin's evaluation of the applicant.

Experience elsewhere demonstrates that recognition of state-regulated non-ABA legal education need not equate to unrestricted eligibility. Effective September 1, 2026, Washington permits a graduate holding a J.D. from a qualifying non-ABA law school accredited by a state or territory or the District of Columbia to apply for its bar examination if the degree was conferred while the school was approved or accredited and the degree qualifies the graduate to apply for the bar examination in that jurisdiction. Washington verifies the applicant's educational eligibility and continues to impose its other requirements for admission.

Washington's change was not adopted without opposition. After the Board of Governors initially approved the expanded definition of an "approved law school" in May 2026, opponents urged the Board to reconsider, raising concerns that recognition of non-ABA legal education would weaken educational safeguards and

expose prospective students and the public to inadequately prepared graduates. The Board reconsidered the matter in July and retained a bounded pathway recognizing qualifying state-approved or state-accredited law schools.⁹

Washington's experience demonstrates that the policy choice is not between exclusive reliance upon ABA approval on one hand and unrestricted admission on the other.

The proposed amendment is more limited than Washington's in an important respect: it does not require creation of a new Wisconsin system for approving non-ABA law schools. It retains the educational threshold Wisconsin has already chosen. Nor should the possibility that additional applicants might become eligible, standing alone, determine whether the existing requirement should remain. The appropriate consideration is whether applicants satisfy standards reasonably designed to establish their qualifications to practice law in Wisconsin.

If an applicant satisfies Wisconsin's educational eligibility requirement, demonstrates the legal competence Wisconsin requires, completes applicable Wisconsin-specific preparation, establishes the requisite character and fitness, and satisfies all other conditions of admission, the fact that the applicant entered the process through a pathway available to additional candidates does nothing to diminish this.

E. The Limited Class Affected by the Amendment Does Not Justify Retaining an Unnecessary Requirement.

The proposed amendment is likely to affect a limited class of applicants because it applies only to graduates of non-ABA-approved law schools whose degrees already qualify them to take the bar examination in the jurisdiction where the school is located. That fact reduces rather than increases concerns that the amendment would overwhelm the Board of Bar Examiners or result in an unrestricted class of applicants.

At the same time, the limited number of applicants affected is not a reason to retain a requirement that serves no regulatory purpose.

⁹ See Wash. State Bar Ass'n, Board of Governors, *Meeting Materials* 484–92 (July 24–25, 2026) (including staff report addressing objections to Washington's expansion of law-school approval beyond ABA accreditation); Wash. State Bar Ass'n, Board of Governors, *Meeting Agenda 2* (July 24–25, 2026) (placing the proposed amendment to the definition of "approved law school" before the Board for action); Wash. State Bar Ass'n, *Admissions Policies* (rev. July 2026) (retaining the expanded definition effective September 1, 2026).

Admission rules should impose requirements reasonably related to the qualifications Wisconsin seeks to establish whether those requirements affect many applicants or few. If prior admission in another jurisdiction provides a necessary safeguard, it should be retained because of that safeguard. If it does not, the fact that few applicants bear the burden does not provide an independent reason to preserve it.

The narrow class affected by the proposed amendment therefore answers one concern without creating another: it substantially limits the possibility of a large administrative impact while leaving the underlying question unchanged—whether prior out-of-state licensure continues to serve a regulatory purpose—especially in light of this Court’s expressed concern about Wisconsin’s lawyer shortage and its interest in attracting and retaining attorneys to serve communities with unmet legal needs.

IV. EFFECT ON PROCEDURAL AND SUBSTANTIVE RIGHTS

The proposed amendment would not alter the procedural or substantive rights of litigants. It does not alter rules governing judicial proceedings, change the rights or obligations of parties to litigation, or modify any substantive cause of action, defense, remedy, or procedural protection.

V. EXPERIENCE OF OTHER JURISDICTIONS AND RELATED RULES

The experience of other jurisdictions demonstrates that graduates of law schools accredited by the jurisdiction in which the school is located may be permitted to demonstrate their competence for admission.

California has long maintained its own system for accrediting law schools through the State Bar’s Committee of Bar Examiners. Graduates of California-accredited law schools are eligible to take the California bar examination, subject to the examination, character-and-fitness, and other requirements imposed upon applicants for admission.¹⁰ California’s experience demonstrates that a state can accredit law schools while separately determining whether individual graduates satisfy its requirements for admission.

Indiana employs a different and more individualized approach. Its rules permit an applicant who graduated from a non-ABA approved law school to seek a waiver of the ordinary educational requirement if the graduate is eligible to take the bar

¹⁰ See State Bar of California, Law Schools Directory (identifying law schools accredited by the State Bar through its Committee of Bar Examiners); State Bar of California, Accredited Law School Rules, tit. 4, div. 2.

examination in another United States jurisdiction and the Indiana Board of Law Examiners determines that the applicant is qualified through education or experience. The applicant must provide transcripts, information concerning the law school's bar-examination results, a description of the applicant's education and experience, and any other information relevant to the Board's determination.¹¹

Washington has adopted an approach more closely resembling SCR 40.04(1)(b). Effective September 1, 2026, Washington permits a person holding a J.D. from a non-ABA law school to apply for its bar examination if the law school was approved or accredited by a state, territory, or the District of Columbia when the degree was conferred and the degree qualifies the graduate to apply for the bar examination in that jurisdiction.¹²

Other jurisdictions continue to consider similar questions. In May 2026, the Supreme Court of Ohio published proposed rule amendments that would establish a state process for approving law schools and create opportunities for graduates of qualifying non-ABA-approved law schools to take the Ohio bar examination.¹³

These approaches are by no means identical, but they reflect increasing consideration of alternatives to exclusive reliance upon ABA approval when determining whether an applicant has received sufficient legal education to be permitted to demonstrate competence for admission.

The proposed Wisconsin amendment is narrower than these approaches. It does not require the authorization of graduates of every non-ABA-approved law school to take its bar examination. It retains the educational limitation already contained in SCR 40.04(1)(b): the applicant must have received a first professional degree in law from a law school whose graduates are eligible to take the bar examination in the jurisdiction in which the law school is located. The amendment removes only the additional requirement that the applicant first pass the bar examination and

¹¹ See Ind. Admission & Discipline R. 13.1. The Board should grant a waiver when doing so would serve the public interest after balancing relevant factors including the applicant's educational and work history, bar-examination results, desire to practice in Indiana, and familiarity with the American legal system.

¹² See Washington State Bar Association, *Admissions Policies* 2–3 (effective Sept. 1, 2026); Washington State Bar Association, *Frequently Asked Questions: Does My Non-ABA Law School or J.D. Qualify?*.

¹³ See Supreme Court of Ohio, *Supreme Court Forges New Pathway for Legal Education in Ohio* (May 28, 2026) (announcing proposed amendments that would establish an Ohio law-school accreditation process and create additional bar-examination pathways).

obtain admission in another jurisdiction before Wisconsin will permit the applicant to demonstrate competence under Wisconsin's own admission requirements.

VI. FISCAL AND ADMINISTRATIVE IMPACT

The proposed amendment would not impose a significant fiscal or administrative burden upon the Court or the Board of Bar Examiners. Under the amended rule, applicants would use Wisconsin's existing bar-admission procedures. Determining educational eligibility would continue to involve application of the objective criterion already contained in SCR 40.04(1)(b): whether graduates of the applicant's law school are eligible to take the bar examination in the jurisdiction in which the school is located.

The amendment could result in additional applications from individuals who presently cannot qualify under SCR 40.04(1)(b) without first becoming admitted elsewhere. Those applications would be processed through the Board's existing admission system.

The amendment would also eliminate the administrative step of determining whether an applicant has satisfied the separate requirement of passing another jurisdiction's examination and obtaining admission there.

For affected applicants, the fiscal effect would be substantial and positive. The amendment would eliminate costs incurred solely for the purpose of obtaining an intermediate out-of-state license, including examination and application fees, travel expenses, character-and-fitness expenses, and other costs associated with obtaining admission in a jurisdiction in which the applicant may not intend to practice.

The amendment would also eliminate the delay inherent in requiring completion of one jurisdiction's entire admission process before an applicant may become eligible to proceed in Wisconsin.

VII. RELATED RULE PETITIONS

There are no related rule petitions presently pending before the Court.

VIII. PREVIOUS ACTION BY THE WISCONSIN SUPREME COURT

The principal previous action by this Court is the 1997-98 rulemaking proceeding that resulted in the present language of SCR 40.04(1)(b), discussed in Section II above.

IX. RELATED PENDING LITIGATION

There is no pending state or federal litigation concerning the proposed amendment.

X. PERSONS AND ENTITIES CONSULTED

Petitioner apprised Martin Pritikin, Dean of Purdue Global Law School, of her interest in attempting to amend SCR 40.04(1)(b). No other persons or entities were consulted.

XI. KNOWN INTERESTED PERSONS AND ENTITIES

Known interested persons and entities include the Wisconsin Board of Bar Examiners, the State Bar of Wisconsin, state-accredited law schools, and graduates of state-accredited law schools who seek to practice in Wisconsin.

XII. EFFECT ON EXISTING RULES, STATUTES, AND CASE LAW

The proposed amendment affects only SCR 40.04(1)(b) and requires no changes to other rules, statutes, or existing case law.

XIII. PUBLIC HEARING

Petitioner does not request a public hearing.

XIV. EXPEDITED CONSIDERATION

Petitioner does not request expedited consideration.

XV. CONCLUSION

SCR 40.04(1)(b) was adopted in an environment substantially different from the one that exists today.

The proposed amendment preserves the objective educational threshold already chosen by this Court: graduates must have attended a law school whose graduates are eligible to take the bar examination in the jurisdiction in which the school is located. That threshold addresses legal education without requiring Wisconsin to become involved in other questions around law school accreditation.

The central question is what regulatory purpose is served by requiring that the applicant first become a licensed attorney in another jurisdiction.

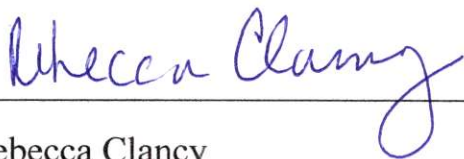
Wisconsin's own recent reforms make that question timely. In 2026, this Court adopted portable examination scores, created a direct Wisconsin law and practice educational component, and expressly sought to reduce unnecessary barriers while maintaining the standards expected of Wisconsin lawyers.

The proposed amendment applies the same principle to SCR 40.04(1)(b).

It does not lower Wisconsin's standards. It does not transfer Wisconsin's ultimate admission authority to another jurisdiction. It does not open the Wisconsin bar to unrestricted admission. It simply removes an intermediate licensing requirement that should be retained only if it serves a sound regulatory purpose.

For these reasons, the petitioner respectfully requests that the Court amend SCR 40.04(1)(b) as proposed.

Respectfully submitted,



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