

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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ONE WISCONSIN INSTITUTE, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

MARK L. THOMSEN, *et al.*,

Defendants.

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**DECLARATION OF JEREMY KROHN  
REGARDING REPORT OF DMV'S INVESTIGATIONS  
INTO IDPP COMPLIANCE**

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I, Jeremy Krohn, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Customer Service Representative—Senior at the Wisconsin Department of Transportation, Division of Motor Vehicles (DMV), Bureau of Field Services. I have been a Customer Service Representative (CSR) since March of 2013.

2. As a CRS, my job duties include providing information and assistance regarding the requirements and procedures for driver licensing, vehicle registration, and identification. I do this by assisting in the completion of proper applications and forms; conducting, evaluating, and

explaining the results of written, vision, hearing and other examinations; determining applicant's eligibility for and issuing ID cards, driving instruction and motor vehicle salespersons permits; and assessing eligibility for driver licenses for regular operator, motorcycle, CDL, occupational, reinstatements, and school bus drivers. My position also includes issuing registrations, titles, and license plates, which requires an evaluation of vehicle type and operation and ownership status. As part of my job, I also have to assess and collect any required fees.

3. I am familiar with the newspaper stories concerning Zack Moore's trip to the DMV on Thursday, September 22. I have also listened to the audio tape that was made during Mr. Moore's DMV visit, and read a transcript that was prepared from that audio recording. This transcript is attached to the Declaration of Gabe Johnson-Karp as **Exhibit A**.

4. I was working at the counter at the Madison East Service Center on Thursday, September 22, 2016.

5. I am the "Supervisor" in the transcript, Exhibit A. However, I am not actually a supervisor at my job. I believe they referred Mr. Moore to me because our supervisor may have been with another customer and I had just gone through the petition process with another customer the day before.

6. When I first came into contact with Mr. Moore on September 22, 2016, I knew he had questions about the IDPP. Before this, I had worked

with IDPP customers about five times. So I knew that if a customer wanted an ID for voting and did not have the required documents, IDPP was the proper process for that client.

7. In the beginning of our discussion, Mr. Moore told me that his sister could mail his birth certificate to him. I understood this to mean that he could easily obtain his birth certificate.

8. Mr. Moore then asked me how long “the other process” would take, which I understood to be the IDPP. I responded “[s]ix to eight weeks.” (See Exhibit A, 11:2–5.) This was an error on my part. In my job I do many titles and registrations, and six to eight weeks is a typical response time for those documents. So this was an incorrect reflexive response to Mr. Moore’s inquiry.

9. I then asked Mr. Moore if he had ever had a Wisconsin ID or driver license before. I asked this because his birth certificate would have been on file if he had one of these products before and I could have found it in the system. Then I could have issued him a photo ID receipt right from my counter, since he had all the other necessary documents.

10. I went on to explain that the IDPP was a lengthier process than if Mr. Moore came in with his birth certificate. This is because we could issue Mr. Moore an ID photo receipt right away if he brought in his birth

certificate, and he could leave the DMV with that photo receipt in hand. It would take minutes to get his ID receipt, versus days.

11. On one point, the female that was with Mr. Moore asked if he could get anything temporary if he entered the petition process. I responded “no” because I interpreted her question as asking if they could leave the DMV that day with a temporary photo ID. (See Exhibit A, 13:4–7.) I believe that this is a common misperception by customers that inquire about the IDPP—they believe a photo ID will be issued the same day they go to the DMV. But we can only produce a photo ID receipt that same day if the customer presents with all the necessary documents, like a birth certificate.

12. I informed Mr. Moore and the female with him that it was much better if he had the birth certificate. I stated this because I believed he could easily access his birth certificate and obtain an ID receipt more quickly—the same day he came to the DMV with the birth certificate. Mr. Moore’s birth certificate would also be in the system should he want a drivers license or other identification product in the future. It would make any future request for these other identification products much easier for Mr. Moore because a birth certificate is required for these other products.

13. We have had instances where a customer started the IDPP and then returned with a birth certificate. In those instances, the IDPP process gets cancelled and the customer is able to walk away with a product/receipt.

By cancelling the process, though, there is a notation put on the record that has to be removed before any duplicate ID can be issued.

14. The female with Mr. Moore then asked me how much an Illinois birth certificate costs. I proceeded to answer her question and provide her the information she requested, even though I believed Mr. Moore was going to have his sister mail him his birth certificate. We have vital records information for all 50 states, and it not uncommon for us to provide that information to individuals that need to obtain a birth certificate for other identification products like a drivers license.

15. I did not believe that Mr. Moore would need to pay for his birth certificate, and my discussion of the costs for birth certificates in Wisconsin and Illinois was just to answer the female's questions, which I did not think applied in Mr. Moore's situation.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 5<sup>th</sup> day of October, 2016.

/s/Jeremy Krohn  
JEREMY KROHN