

**In The Matter Of:**

*One Wisconsin Institute, Inc., et al. vs.  
Gerald C. Nichol, et al.*

---

*Deposition of SCOT ROSS on behalf of One Wisconsin Institute  
April 22, 2016*

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**Verbatim Reporting, Limited**

2 East Mifflin Street, Suite 102

Madison, Wisconsin 53703

[www.Verbatim-Madison.com](http://www.Verbatim-Madison.com)

[verbatim@tds.net](mailto:verbatim@tds.net)

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*Min-U-Script® with Word Index*

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1 United States District Court for the  
 2 Western District of Wisconsin  
 3 =====  
 4 One Wisconsin  
 5 Institute, Inc., et al,  
 6 Plaintiffs, Case No. 15-CV-324  
 7 -vs- Gerald C. Nichol, et al,  
 8 Defendants.  
 9 =====  
 10 Deposition of:  
 11 Scot Ross on behalf of  
 12 One Wisconsin Institute  
 13 Madison, Wisconsin  
 14 April 22nd, 2016  
 15  
 16 Reported by: Paula Thompson  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

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1 DEPOSITION of SCOT ROSS ON BEHALF OF ONE  
 2 WISCONSIN INSTITUTE, called as a witness, taken at  
 3 the instance of the Defendants, under the provisions  
 4 of Chapter 804 of the Wisconsin Statutes, pursuant to  
 5 Notice, before Paula Thompson, a Notary Public in and  
 6 for the State of Wisconsin, at Perkins Coie, LLP, One  
 7 East Main Street, Suite 201, City of Madison, County  
 8 of Dane, and State of Wisconsin, on the 22nd day of  
 9 April, 2016, commencing at 12:55 p.m.  
 10  
 11 A P P E A R A N C E S  
 12  
 13 JOSHUA KAUL, Attorney,  
 14 PERKINS COIE  
 15 One East Main Street, Suite 201, Madison,  
 16 Wisconsin 53703-5118, appearing on behalf of  
 17 the Plaintiffs.  
 18 jkaul@perkinscoie.com 608-663-7460  
 19  
 20 CLAYTON KAWSKI, Attorney,  
 21 STATE OF WISCONSIN, DEPARTMENT OF JUSTICE  
 22 ASSISTANT ATTORNEY GENERAL, DIVISION OF LEGAL  
 23 SERVICES  
 24 17 West Main Street, P.O. Box 7857, Madison,  
 25 Wisconsin 53707-7857, appearing on behalf of  
 the Defendants.  
 kawskicp@doj.state.wi.us 608-266-1221

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1 SCOT ROSS,  
 2 called as a witness on behalf of One  
 3 Wisconsin Institute, being first duly  
 4 sworn, testified on oath, as follows:  
 5 EXAMINATION  
 6 BY MR. KAWSKI:  
 7 Q Good afternoon, Mr. Ross. My name is Clay  
 8 Kowski. I'm an Assistant Attorney General at the  
 9 Wisconsin Department of Justice; and we're here  
 10 today for your deposition -- actually, the  
 11 deposition of One Wisconsin Institute, Inc., in  
 12 the case One Wisconsin Institute, Inc., versus  
 13 Gerald C. Nichol. And I have -- I guess the case  
 14 number is 15CV324. It's in the United States  
 15 District Court for the Western District of  
 16 Wisconsin. Before we get started, I'm just going  
 17 to go over basic instructions for a deposition.  
 18 Have you ever been deposed before?  
 19 A No.  
 20 Q Have you ever attended a deposition?  
 21 A Yes.  
 22 Q Okay. So what -- I just go through this with all  
 23 witnesses so we understand the best way to  
 24 proceed. Most of this has to do with helping the  
 25 court reporter do the job of making a transcript.

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1 So we want to make sure that we give verbal  
 2 answers, not nodding a head because she might  
 3 miss that. So she can -- I think she can make a  
 4 notation of that, but you want to answer yes or  
 5 no or some verbal answer. Do you understand  
 6 that?  
 7 A Understood.  
 8 Q Okay. And then we want to be careful not to talk  
 9 over each other. So, if I ask a question, don't  
 10 start answering until you're pretty clear I'm  
 11 done; and I'll do the same with your answers.  
 12 Okay?  
 13 A Sounds good.  
 14 Q Okay. Is there any reason you can't testify  
 15 truthfully today such as you're on alcohol or  
 16 some kind of medication?  
 17 A No.  
 18 Q Okay. If -- if I ask a question and you answer  
 19 it, is it fair for me to understand -- for me to  
 20 assume you've understood the question?  
 21 A Yes.  
 22 Q Okay. And you'll ask for clarification if you  
 23 don't understand?  
 24 A Yes.  
 25 Q Okay. If you need to take a break at any time,

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1 just let me know; but it's not fair game to ask  
 2 for a break in the middle of a question. You  
 3 have to answer the question first.  
 4 A Yes.  
 5 Q Okay. I'm going to start off with the deposition  
 6 notice, which maybe you've seen, maybe you  
 7 haven't. But I'm going to have the -- we'll mark  
 8 this one. This one will be the copy, and she'll  
 9 mark that one. And that's -- and that's Josh's  
 10 copy.  
 11 MR. KAUL: You get the marked ones.  
 12 MR. KAWSKI: Yeah. So if you'll mark  
 13 that as Exhibit 1. We're not going to continue  
 14 from the last depo.  
 15 (Exhibit 1 was marked.)  
 16 A Thank you.  
 17 BY MR. KAWSKI (CONTINUING):  
 18 Q All right. So take a look at that, and you can  
 19 flip through the whole thing. And, when you're  
 20 done with it, let me know.  
 21 A Okay.  
 22 Q Okay. So what is it Exhibit 1?  
 23 A It's a listing of a deposition -- a listing of  
 24 things that you want to ask me about.  
 25 Q Okay. And you understand, based on this notice,

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1 that you're here today to speak on behalf of One  
 2 Wisconsin Institute, Inc.; right?  
 3 A Yes.  
 4 Q Okay. And you're prepared to testify about the  
 5 topics that are listed here?  
 6 A Yes.  
 7 Q Okay. I might be referring to this here and  
 8 there but probably not very much. I'm just going  
 9 to ask you more generalized questions, and I  
 10 might -- I might use it to jog our memories about  
 11 where we are but -- so one of the purposes of --  
 12 of this notice is to -- to find out what the  
 13 Plaintiff One Wisconsin Institute, Inc., knows  
 14 and its position on things in this case. Do you  
 15 understand that?  
 16 A Yes.  
 17 Q And you're a representative from that entity?  
 18 A Yes.  
 19 Q What is your position with that entity, if -- if  
 20 any?  
 21 A I'm the executive director.  
 22 Q Are you the executive director of One Wisconsin  
 23 Institute, Inc., or some other entity?  
 24 A I'm the executive director at One Wisconsin  
 25 Institute, Inc.

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1 Q Okay. So the corporate entity?  
 2 A Yes.  
 3 Q Are you also affiliated with One Wisconsin Now?  
 4 A Yes.  
 5 Q In -- in what capacity?  
 6 A I am the executive director of One Wisconsin Now.  
 7 Q Okay. So there's like a joint executive  
 8 directorship there, or explain to me why you're  
 9 -- why you're executive director of both?  
 10 A We have two entities, One Wisconsin Institute and  
 11 One Wisconsin Now; and I serve as the executive  
 12 director of both.  
 13 Q Okay. And what does One Wisconsin Institute --  
 14 which I'll from here on out refer to it as One  
 15 Wisconsin Institute or One Wisconsin Institute  
 16 Inc. What they do, how does it differ from what  
 17 One Wisconsin Now does?  
 18 MR. KAUL: And let me just interpose my  
 19 objection, and I'll let you answer in just a  
 20 minute. But -- and I'm not going to keep raising  
 21 this objection, so I'll just put it on the  
 22 record. Since Mr. Ross is here as the 30(b)(6),  
 23 his testimony is all, of course, not on behalf of  
 24 himself but on behalf of One Wisconsin Institute.  
 25 So I -- there's been questions about what he does

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1 and that sort of thing, but I just want to make  
 2 clear for the record this is his explanation on  
 3 behalf of the institute. So, with that, you can  
 4 answer the question or have it asked back to you.  
 5 A Yeah. Could you repeat it?  
 6 **BY MR. KAWSKI (CONTINUING):**  
 7 **Q Sure. I guess the -- the basic question is, what**  
 8 **does One Wisconsin Institute, Inc., do that's**  
 9 **different from what One Wisconsin Now does?**  
 10 A One Wisconsin Institute is a research and ad --  
 11 research and education entity as its primary  
 12 purpose. One Wisconsin Now is an advocacy  
 13 organization for its primary purpose.  
 14 **Q Okay. And so what does -- what does that mean?**  
 15 **In terms of advocacy, does that mean taking**  
 16 **positions on issues?**  
 17 A Yes.  
 18 **Q Okay. Does One Wisconsin Institute also take**  
 19 **positions on issues?**  
 20 A In some forms, yes.  
 21 **Q Okay. You were going to elaborate?**  
 22 A In some -- in some forms, yes.  
 23 **Q Okay. Do -- do the two entities end up taking**  
 24 **different positions?**  
 25 A No.

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1 **Q No. Okay. Why have two different entities then?**  
 2 A Because One Wisconsin Institute's primary mission  
 3 is research and education. We will occasionally  
 4 provide some advocacy on positions through  
 5 Institute, but the primary purpose is research  
 6 and education.  
 7 **Q Okay.**  
 8 A One Wisconsin Now on the other hand is an  
 9 advocacy organization in which we do much more  
 10 striving calls for action.  
 11 **Q Okay. And does it -- is the tax status**  
 12 **implicated? Is that another reason why you would**  
 13 **have separate entities?**  
 14 A Yeah. One Wisconsin Institute is a 501(c)(3),  
 15 and One Wisconsin Now is a 501(c)(4).  
 16 **Q I see. Okay. That makes sense. So I'm going to**  
 17 **try as best as I can to focus on not what you**  
 18 **yourself do but on the entity One Wisconsin**  
 19 **Institute; although, I think it'll be difficult.**  
 20 **How long has One Wisconsin Institute been around?**  
 21 A I believe it was incorporated in December of  
 22 2005.  
 23 **Q Okay. And has it taken other names or forms**  
 24 **since that time?**  
 25 A I believe the original name of the organization

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1 was Advancing Wisconsin Institute or some --  
 2 there was -- there was Advancing Wisconsin, and  
 3 then there was Advance -- there were -- the name  
 4 was originally Advancing Wisconsin, and there was  
 5 a 501(c)(3), a 501(c)(4), and then I believe a  
 6 527.  
 7 **Q Okay.**  
 8 A I do not know when they changed to One Wisconsin  
 9 Now. That was prior to me getting my position in  
 10 August of 2007.  
 11 **Q Okay. And so when you got that position, what**  
 12 **was your role with the One Wisconsin Institute**  
 13 **entity at that time?**  
 14 A When I was hired, it was to be in charge of both  
 15 organizations.  
 16 **Q Okay. And so you were the executive director?**  
 17 A Yes.  
 18 **Q And you've been in that capacity since that time?**  
 19 A Yes.  
 20 **Q Okay. How -- at the -- at the time of when One**  
 21 **-- One Wisconsin Institute came into being, how**  
 22 **many employees did it have that were paid?**  
 23 A I wouldn't be able to answer that.  
 24 **Q How about --**  
 25 A I really can't.

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1 **Q -- when you came on board, how many paid**  
 2 **employees?**  
 3 A I believe I was the -- let me think. I believe  
 4 there were four.  
 5 **Q Okay. And has that staffing level been**  
 6 **consistent since -- since that time of, like,**  
 7 **2007?**  
 8 A For the most part. We've had -- there have been  
 9 periods where there have been more, and there  
 10 have been periods where there have been less.  
 11 **Q Okay. Can you describe the periods when there**  
 12 **have been more and how many more?**  
 13 A Actually, as far as employees go, I think we  
 14 pretty -- pretty much have been consistent. We  
 15 -- we did close our office -- one of our offices  
 16 in two thousand -- at the end of 2008; and so we  
 17 had, I believe, two less employees for a period  
 18 of time.  
 19 **Q Okay. So do you currently have more than one**  
 20 **office?**  
 21 A No.  
 22 **Q Okay. Where is the office?**  
 23 A It is 152 West Johnson Street, Madison,  
 24 Wisconsin, Suite 214.  
 25 **Q Okay. And how -- how many employees work there**

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1 as of today?  
 2 A Myself and four.  
 3 Q Okay. And they're all full-time?  
 4 A Yes.  
 5 Q Okay. Have you ever had any part-time employees?  
 6 A We've had some contractors --  
 7 Q Okay.  
 8 A -- who have done work for us.  
 9 Q Okay. And when was that?  
 10 A Various times over the years.  
 11 Q Did you have any in 2011?  
 12 A I can't say with surety.  
 13 Q Okay. What -- for what purposes would you have  
 14 hired contractors?  
 15 A To provide a service that we currently didn't  
 16 have.  
 17 Q Such as?  
 18 A Bookkeeping.  
 19 Q Anything else?  
 20 A I can't speak to that period of time whether 2011  
 21 is or not. But, for instance, if we needed legal  
 22 assistance --  
 23 Q Have you had --  
 24 A -- that might have been --  
 25 Q Sorry. Have you had a lawyer on staff as a paid

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1 lead the team.  
 2 Q Okay. And then the deputy director, what duties  
 3 does that person have?  
 4 A Communications, writing information, coordinating  
 5 with the other departments about communications  
 6 related to those --  
 7 Q Okay.  
 8 A -- operations.  
 9 Q Then the third staff was a research --  
 10 A Yes.  
 11 Q What was the title again?  
 12 A Research director.  
 13 Q What does that person do?  
 14 A All of the vast amount of research and leads  
 15 research -- all of our research efforts.  
 16 Q What type of research?  
 17 A We -- you know, research issues that are facing  
 18 the State of Wisconsin and nationally.  
 19 Q Okay. For example?  
 20 A One of our big issues is student loan debt.  
 21 Q Okay.  
 22 A So we've done a voluminous amount of information  
 23 on student loan debt going back to -- I believe  
 24 the first time we started talking about it was in  
 25 2008 or 2009. For instance, we crafted an

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1 employee?  
 2 A We do now, yes.  
 3 Q Okay. So which employees are currently  
 4 attorneys?  
 5 A Jennifer Dye, our research director.  
 6 Q Okay. Any other lawyers that you've had on  
 7 staff?  
 8 A To my knowledge, no.  
 9 Q Okay. And you, yourself, are not?  
 10 A No.  
 11 Q Okay. So what are the other positions that you  
 12 have currently for staff?  
 13 A I have a deputy director. I have a research  
 14 director. I have a program and development  
 15 director, which is one person; and I have an  
 16 online director.  
 17 Q Okay. Let's talk about what -- first of all,  
 18 your position as executive director. What are  
 19 your duties?  
 20 A My duties are to manage the operation, to lead  
 21 the fundraising efforts, to assist the staff in  
 22 the execution of their duties, serve as a  
 23 spokesperson for the organization but not  
 24 exclusively, work with coalitions, speak to the  
 25 media -- I think I noted that already -- and help

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1 enormous report on the economic impact and length  
 2 of debt related to student loan debt payments in  
 3 the State of Wisconsin. Focusing mostly on the  
 4 acquisition of new automobiles and home ownership  
 5 and length of debt and what -- what the amount of  
 6 debt that is, and putting that project together  
 7 was sort of a first real salvo in terms of the  
 8 work that we have now done, which is nationally  
 9 recognized in terms of the student loan debt  
 10 crisis. We've done, you know, a number of other  
 11 things related to, you know, the impact of budget  
 12 decisions made by the state legislature on higher  
 13 education and how those have impacted the student  
 14 loan debt crisis.  
 15 Q Okay. And prev -- this research director  
 16 produces some of the product, meaning some  
 17 publications?  
 18 A Yes.  
 19 Q What form do they take?  
 20 A We post all of our -- we post the majority of our  
 21 information online available to our website.  
 22 Q Okay. So are they, like, white papers or  
 23 something else?  
 24 A Yeah.  
 25 Q Okay. And then do you do -- does that individual

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1 **also do work with regard to research about**  
 2 **election laws, election administration?**  
 3 A Some.  
 4 **Q Okay. What type of work?**  
 5 A Well, I'll give you an example. We receive  
 6 notices of bills that are coming before the  
 7 legislature what are, you know, the -- you know,  
 8 what is -- what are people being asked to sign on  
 9 to regarding legislation. And so she will look  
 10 at those, you know, as we all do to take a look  
 11 and see things that we find problematic. It is a  
 12 -- you know, there are times when it's -- when  
 13 there was a lot of different legislation that  
 14 comes up that we find. Not a whole range of  
 15 issues but certainly when it regards voting  
 16 rights. And -- you know, and that -- that's a --  
 17 that's a form of research, how big -- how big of  
 18 a deal is this? What's the impact? Those sorts  
 19 of things.  
 20 **Q Okay. Going back to the executive directors**  
 21 **roles, fundraising, what does that entail? Is it**  
 22 **-- for example, does it involve making calls to**  
 23 **people to ask for money?**  
 24 A Absolutely.  
 25 **Q Okay. What is the -- what are the sources of**

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1 **funds for One Wisconsin Institute?**  
 2 **MR. KAUL:** I'm going to object to any  
 3 information regarding particular funders and  
 4 instruct the witness not to answer that as being  
 5 confidential and privileged under the first  
 6 amendment. I do believe that there's a 1099  
 7 that's disclosed. Certainly, you're welcome to  
 8 talk about that. And also, generally, you can  
 9 talk about sort of what the process is for  
 10 fundraising and how you go about soliciting  
 11 funds.  
 12 **THE WITNESS:** May I correct you just on  
 13 one thing? It's 990.  
 14 **MR. KAUSKI:** 990.  
 15 **THE WITNESS:** The form is --  
 16 **MR. KAUL:** I'm not a tax lawyer.  
 17 **THE WITNESS:** The form is 990.  
 18 **MR. KAUL:** Okay.  
 19 **BY MR. KAUSKI (CONTINUING):**  
 20 **Q So the form 990 would disclose what?**  
 21 A Our total revenue and total disbursements.  
 22 **Q And what is the total revenue for the most recent**  
 23 **tax year?**  
 24 A I can't say.  
 25 **Q Could you give me a sense? Estimate?**

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1 A One Wisconsin Institute, in the neighborhood of  
 2 100, \$120,000.  
 3 **Q Okay. And that's -- that's the revenue number?**  
 4 A Mm-hmm.  
 5 **Q And then disbursements?**  
 6 A Approximately the same.  
 7 **Q Okay. So you spend about what you take in --**  
 8 **A Exactly.**  
 9 **Q -- on -- and -- and so where do those**  
 10 **disbursements go? How -- what are they spent on?**  
 11 A Well, any number of things, paying the -- paying  
 12 our -- the salaries of personnel, paying for the  
 13 operation of the office itself and our office  
 14 space, paying for, you know, the supplies which  
 15 are needed in order to run an office.  
 16 **Q What is the executive director's salary for a**  
 17 **year?**  
 18 A For?  
 19 **Q For one year.**  
 20 A For which year?  
 21 **Q Well, you just said for these disbursements.**  
 22 **Like, for the most recent year, what does the**  
 23 **executive --**  
 24 A For which -- for which entity?  
 25 **Q For -- for -- let's start with One Wisconsin**

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1 **Institute.**  
 2 A I believe it's --  
 3 **MR. KAUL:** And I'm -- I'll let you  
 4 answer the question. I'll -- I'll object just  
 5 for this purpose. I -- we may want to designate  
 6 this as confidential after this deposition.  
 7 **MR. KAUSKI:** That's fine.  
 8 **MR. KAUL:** But -- so I just wanted to  
 9 note that for the record.  
 10 **MR. KAUSKI:** Yeah.  
 11 A Okay. I think in the neighborhood of about  
 12 30,000.  
 13 **BY MR. KAUSKI (CONTINUING):**  
 14 **Q Okay. And so for -- same question as to One**  
 15 **Wisconsin Institute, the deputy director's salary**  
 16 **for a year.**  
 17 **MR. KAUL:** I'll -- same point with  
 18 respect to all of the salary questions. Do -- do  
 19 we need a minute to talk?  
 20 **THE WITNESS:** Yeah.  
 21 **MR. KAUL:** Would you -- do you mind if  
 22 we take a minute to discuss?  
 23 **MR. KAUSKI:** Yeah. That's fine.  
 24 (Recess.)  
 25 **MR. KAUL:** All right. So I'll -- I'll

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1 put this on the record. My understanding is that  
 2 the executive director's salary is included on  
 3 the 990, so it's publicly disclosed. So  
 4 questions related to that, I guess, we don't have  
 5 an objection to. The other information is -- is  
 6 private, and we do object to that; and I'm going  
 7 to instruct the witness not to answer both on  
 8 confidentiality grounds but also on relevance  
 9 grounds.

10 **MR. KAUSKI:** And I'll just say for the  
 11 record that the relevance is there's an  
 12 allegation that there had been a diversion of  
 13 resources from One Wisconsin Institute, and so  
 14 I'm entitled to ask questions about the amount of  
 15 the diversions in relation to the total  
 16 disbursements that the entity makes; so that's  
 17 very relevant.

18 **MR. KAUL:** We wouldn't have any  
 19 objections to questions about the amount of the  
 20 diversion, but the base salary is a separate  
 21 question.

22 **MR. KAUSKI:** Well, I'm going to ask the  
 23 questions; and you can object.

24 **MR. KAUL:** Fair enough.

25 **BY MR. KAUSKI (CONTINUING):**

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1 **Q So I asked the -- the question -- and I think**  
 2 **that was pending.**

3 **MR. KAUL:** Sorry. And let me -- let me  
 4 also just make the record that the case law is  
 5 actually that the amount of the diversion is not  
 6 relevant. It's just the fact of diversion that's  
 7 relevant. So that -- we also think, for that  
 8 reason, it's not relevant.

9 **MR. KAUSKI:** Okay.

10 **BY MR. KAUSKI (CONTINUING):**

11 **Q I asked the question of, what is the salary of**  
 12 **the deputy director for One Wisconsin Institute?**

13 **MR. KAUL:** And I'm going to object and  
 14 instruct you not to answer that question for the  
 15 reasons we discussed.

16 **MR. KAUSKI:** Yep.

17 **BY MR. KAUSKI (CONTINUING):**

18 **Q What is the salary of the research director for**  
 19 **One Wisconsin Institute?**

20 **MR. KAUL:** Same objection. Same  
 21 instruction.

22 **BY MR. KAUSKI (CONTINUING):**

23 **Q And then what are the salaries for the remaining**  
 24 **employees of One Wisconsin Institute that we've**  
 25 **already talked about?**

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1 **MR. KAUL:** Same objection. Same  
 2 instruction.

3 **BY MR. KAUSKI (CONTINUING):**

4 **Q Okay. So just so you understand why I'm asking,**  
 5 **in the case, it's relevant to determine whether**  
 6 **One Wisconsin has diverted resources away from**  
 7 **its primary mission towards efforts relating to**  
 8 **these challenged laws. Do you understand that?**

9 **A** I do.

10 **Q And so I'm trying to determine what -- what**  
 11 **resources, if any, have been diverted away from**  
 12 **what you would normally be doing to addressing**  
 13 **the challenged laws. You understand that?**

14 **A** Yes.

15 **Q Can you tell me what -- what resources have been**  
 16 **diverted in your mind?**

17 **A** The primary resource of One Wisconsin Now -- or  
 18 One Wisconsin Institute is its staff time.

19 **Q Okay.**

20 **A** And it's time that we would have spent working on  
 21 issues that we care about related to student loan  
 22 debt, perhaps the privatization of public  
 23 education, healthcare, any number of issues were  
 24 diverted as a result of us having to work so hard  
 25 and so long on the act -- on the attacks on voter

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1 rights that have gone on in the State of  
 2 Wisconsin in the last five years.

3 **Q Okay. So, in 2007, when you became involved with**  
 4 **One Wisconsin, was One Wisconsin in a position**  
 5 **where it was doing education and research with**  
 6 **regard to voting rights issues?**

7 **A** I would think -- I -- you know, if memory serves  
 8 me correctly, we -- there has been for a very  
 9 long time certain forces who have spoken loudly  
 10 alleging that there is rampant voter fraud in the  
 11 State of Wisconsin. We have spoken on that issue  
 12 and done some work to say that that in -- in  
 13 itself is not going on in the State of Wisconsin.

14 **Q Okay. So, again, I'm asking you this. Since**  
 15 **you've been involved with One Wisconsin as an**  
 16 **executive director, has one of the roles of One**  
 17 **Wisconsin been advocacy with regard to voting or**  
 18 **elections?**

19 **A** Related to the people being able to -- legal  
 20 voters being able to vote?

21 **Q Yes.**

22 **A** Yes.

23 **Q Okay. So it's always, in your experience, been a**  
 24 **mission of One Wisconsin to have a role in**  
 25 **protecting voting rights?**

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1 A Well, yeah. Yes.  
 2 **Q It has always been?**  
 3 A Yes.  
 4 **Q Okay. And so how does that result in a diversion**  
 5 **away? Your -- your -- One Wisconsin was already**  
 6 **doing that. So how is there any diversion?**  
 7 A Because of the amount of the volume of work that  
 8 we have had to do because of the ceaseless acts  
 9 on the right to vote in the State of Wisconsin.  
 10 **Q Okay.**  
 11 A There's a difference between, here's information  
 12 that we have related to how little -- how little  
 13 actual election in propriety exists in the State  
 14 of Wisconsin and educating people about that and  
 15 having to be defensive and provide time and  
 16 resources to allow people information about how  
 17 their right to vote is under attack and what they  
 18 need to do regarding any number of -- the number  
 19 of pieces of legislation that have passed over  
 20 the last five years.  
 21 **Q Can you -- as -- as speaking for One Wisconsin**  
 22 **Institute, can you quantify the amount of first**  
 23 **time that was diverted away from other missions**  
 24 **and towards this -- what you just described, this**  
 25 **-- this mission about voting right protection?**

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1 A Well, I would say this. That -- and this is a --  
 2 this is a difficult calculation to make. The --  
 3 you -- you want the -- I'm sorry.  
 4 **Q First, the --**  
 5 A You want the amount of time?  
 6 **Q Yes. First, the amount of time.**  
 7 A I would say that, if the attacks on voter rights  
 8 weren't happening, that every moment that we  
 9 spent having to discuss voting issues was taken  
 10 away from work we might have done on, for  
 11 instance, student loan debt.  
 12 **Q Okay. Of the -- say there's a pie, and it's**  
 13 **100 percent of -- and that would be the resources**  
 14 **of One Wisconsin. What percentage of that pie is**  
 15 **dedicated to voting rights issues currently?**  
 16 **MR. KAUL:** And -- and, just for  
 17 clarification, I'm comfortable with you using One  
 18 Wisconsin as a shorthand for One Wisconsin  
 19 Institute.  
 20 **MR. KAWSKI:** Yeah.  
 21 **MR. KAUL:** I only mention it because I  
 22 just want to make the record clear --  
 23 **MR. KAWSKI:** Sure.  
 24 **MR. KAUL:** -- that, by that, you mean  
 25 One Wisconsin Institute and not One Wisconsin

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1 Now.  
 2 **MR. KAWSKI:** Yes. If I -- I guess what  
 3 I'll say is, from here on out, if I'll mean One  
 4 Wisconsin Now, I'll say Now.  
 5 **THE WITNESS:** Thank you.  
 6 **BY MR. KAWSKI (CONTINUING):**  
 7 **Q So -- so back to the question. If it's a pie and**  
 8 **the pie is 100 percent, what -- what percentage**  
 9 **of that pie is currently dedicated to voting**  
 10 **rights issues?**  
 11 A I'd say probably in the neighborhood of 70,  
 12 75 percent.  
 13 **Q Okay. And how does that compare to -- that same**  
 14 **pie, if you'd look at it, when you started with**  
 15 **One Wisconsin?**  
 16 A Maybe 10 percent.  
 17 **Q Okay. And then does that --**  
 18 A Before you go -- Oh.  
 19 **Q Go ahead.**  
 20 A Can I get some --  
 21 **Q Yeah.**  
 22 **MR. KAUL:** Oh, sure.  
 23 **MR. KAWSKI:** Let's take a quick break.  
 24 **MR. KAUL:** Off the record.  
 25 (Recess.)

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1 **MR. KAWSKI:** All right. Back on the  
 2 record. Could you please read back the question?  
 3 (Question read back.)  
 4 A Yeah. I'd say about 10 percent. We -- I -- it  
 5 seemed when I started at about 10 percent of our  
 6 focus was on voter rights.  
 7 **BY MR. KAWSKI (CONTINUING):**  
 8 **Q Okay. At what point did that -- that begin to**  
 9 **shift towards voting rights? What year?**  
 10 A Probably 2009, 2010.  
 11 **Q Okay. And what -- what was going on in 2009,**  
 12 **2010 that began to create that shift?**  
 13 A Well, we saw -- we started seeing a lot more -- a  
 14 lot more discussion about voter fraud and then  
 15 people who were running for office talking about  
 16 things they wanted to do related to voter rights.  
 17 **Q Okay. I guess we had talked about voter fraud.**  
 18 **Since this has come up a number of times, is it**  
 19 **One Wisconsin's position that there is no voter**  
 20 **fraud, some, or a lot?**  
 21 A We believe from the evidence, which has been  
 22 brought up in trial, previous trials, that there  
 23 has not been a single case of in-person voter  
 24 impersonation in any recent election in the State  
 25 of Wisconsin.



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1 **Q Okay.**  
2 A And I believe the calculation between 2004 and  
3 2014 was that 17 million ballots had been cast.  
4 **Q Okay. So let's talk about the -- One Wisconsin's**  
5 **understanding of the phrase "voter fraud." What**  
6 **is One Wisconsin's understanding of that phrase?**  
7 A Well, that -- somebody impersonating somebody  
8 else.  
9 **Q That's all it includes?**  
10 A That is -- that is -- that's what we consider  
11 voter fraud to be -- be in -- in -- in a large  
12 part because of what the solution -- what the  
13 sort of seminal solution that was provided to  
14 combat allegations of voter fraud.  
15 **Q Okay. So in One Wisconsin's mind, someone who**  
16 **double votes is not committing voter fraud?**  
17 A I did not say that.  
18 **Q Okay. I -- and that's what I'm trying to get**  
19 **your -- what you consider to be voter fraud. You**  
20 **consider it all to be impersonation fraud?**  
21 A I consider that, yes. I do -- as an  
22 organization, that is where we -- that is where  
23 we have fought most hard -- most -- that is where  
24 we find the largest amount of discussion of  
25 something going on, a solution which does not

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1 solve the problem.  
2 **Q Does One Wisconsin consider it to be voter fraud**  
3 **if someone votes twice in an election?**  
4 A I think that's fair, yes.  
5 **Q Okay. Is One Wisconsin aware of a recent**  
6 **conviction of voter fraud by a man named Robert**  
7 **Monroe from Shorewood, Wis -- Shorewood near**  
8 **Milwaukee?**  
9 A I believe I recall that.  
10 **Q Okay. What does One Wisconsin know about that?**  
11 A I believe that that was somebody who voted a  
12 number of times.  
13 **Q Okay. In which elections?**  
14 A I thought it might have been the recall of the  
15 governor.  
16 **Q Okay. How many times did he vote?**  
17 A I can't say with substance.  
18 **Q Was he convicted of multiple felonies?**  
19 **MR. KAUL:** And I'll -- I'll raise an  
20 objection to this line just on hearsay grounds.  
21 But you're permitted to answer the question.  
22 A I don't recall if he received a felony.  
23 **BY MR. KAWSKI (CONTINUING):**  
24 **Q Did he plead to a felony?**  
25 A I don't -- I don't recall.

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1 **Q You don't recall. Does One Wisconsin, as an**  
2 **entity, stay up to date on the news with regard**  
3 **to voter fraud allegations and convictions?**  
4 A Yes.  
5 **Q Okay. So it's fair to say then that One**  
6 **Wisconsin's aware that there had been convict --**  
7 **convictions for voter fraud? And I'm not talking**  
8 **about impersonation fraud.**  
9 A I couldn't say if under the law what he was  
10 convicted of was voter fraud.  
11 **Q Okay.**  
12 A I'm not an attorney.  
13 **Q Okay. So based -- what -- again, what is One**  
14 **Wisconsin's definition of voter fraud?**  
15 A For the -- for the purposes of this, I -- you  
16 know, we have looked at the allegations that  
17 people are voting -- using -- are -- that are --  
18 people are -- are representing themselves as  
19 other human beings in order to vote.  
20 **Q Do you know if One Wisconsin's expert witness is,**  
21 **in this case, to find voter fraud the same way?**  
22 A I do not.  
23 **Q Okay. Would it surprise you if I told you they**  
24 **do not?**  
25 **MR. KAUL:** Object to form. But you can

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1 answer.  
2 **THE WITNESS:** I'm sorry. Please repeat.  
3 **MR. KAWSKI:** Could you please read back  
4 the question?  
5 (Question read back.)  
6 **THE WITNESS:** Can you go back?  
7 **BY MR. KAWSKI (CONTINUING):**  
8 **Q Did not define it the same way?**  
9 A No.  
10 **Q Okay. Does One Wisconsin take any public**  
11 **position about whether those instances of someone**  
12 **double voting such as Mr. Monroe are considered**  
13 **voter fraud?**  
14 A I don't know that we have.  
15 **Q Okay. So they just haven't -- One Wisconsin**  
16 **hasn't just -- just hasn't taken any position on**  
17 **it at all?**  
18 A I don't know that we have.  
19 **Q Okay. Can you say, speaking for One Wisconsin**  
20 **Institute today, what position it would take on**  
21 **someone double voting, whether that's considered**  
22 **voter fraud?**  
23 A I don't --  
24 **THE WITNESS:** Can you repeat that?  
25 (Question read back.)

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1 A I don't know that I'm -- I am necessarily --  
 2 going to answer that. I mean --  
 3 **MR. KAUL:** I'll -- I'll instruct you to  
 4 answer to the best of your ability.  
 5 A To the best of my ability, if somebody commits  
 6 election -- election fraud, they should be  
 7 prosecuted.  
 8 **BY MR. KAWSKI (CONTINUING):**  
 9 **Q Okay. So in -- in this case, One Wisconsin is**  
 10 **challenging many laws; correct?**  
 11 A Mm-hmm.  
 12 **Q One Wisconsin, the entity, though, is not subject**  
 13 **to these laws?**  
 14 **MR. KAUL:** I'm going to object. I -- I  
 15 don't understand the question myself. So I  
 16 guess --  
 17 **BY MR. KAWSKI (CONTINUING):**  
 18 **Q Sure. Let me ask it --**  
 19 A One Wisconsin Institute is a non-sto -- stock  
 20 corporation. It is not a human being.  
 21 **Q Right. So One Wisconsin has no right to vote?**  
 22 A No.  
 23 **Q Okay. One Wisconsin has no race?**  
 24 **MR. KAUL:** I'll object to all of these  
 25 as legal -- to the extent they're calling for

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1 legal conclusions. But you can give your  
 2 understanding as a lay witness to these  
 3 questions.  
 4 **BY MR. KAWSKI (CONTINUING):**  
 5 **Q One Wisconsin has no race?**  
 6 A No.  
 7 **Q Okay. It's not white?**  
 8 A No.  
 9 **Q It's not black?**  
 10 A No.  
 11 **Q Not Hispanic?**  
 12 A No.  
 13 **Q But One Wisconsin believes that -- it -- it --**  
 14 **itself can challenge these laws. And what is the**  
 15 **reason that it believes it can?**  
 16 **MR. KAUL:** Again, I object to the extent  
 17 it calls for a legal conclusion; but you can give  
 18 your understanding as a lay witness as to why you  
 19 believe One Wisconsin can challenge the laws.  
 20 A Because we are citizens of the state.  
 21 **BY MR. KAWSKI (CONTINUING):**  
 22 **Q One Wisconsin is a citizen of the state?**  
 23 A Because the individuals who are One Wisconsin  
 24 Institute.  
 25 **Q Okay. So One Wisconsin -- we said One Wisconsin**

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1 **Institute is a corporation?**  
 2 A Yeah.  
 3 **Q So what individuals are a corporation? I don't**  
 4 **understand that.**  
 5 **MR. KAUL:** Again, I object to the extent  
 6 this calls for legal conclusions. I also object  
 7 to some extent of relevance because this is  
 8 really a legal issue that's being discussed, I  
 9 think. But with that explanation, you can answer  
 10 the question; and she can read it back if you  
 11 need her to.  
 12 **THE WITNESS:** Yeah. Go ahead, please.  
 13 (Question read back.)  
 14 A Individuals are not -- One Wisconsin Institute  
 15 cares about people having access to the ballot  
 16 box, and so that is why we have engaged in this  
 17 lawsuit.  
 18 **BY MR. KAWSKI (CONTINUING):**  
 19 **Q Okay. Does One Wisconsin Institute have members?**  
 20 A No.  
 21 **Q No members?**  
 22 A No.  
 23 **Q Okay. And does it have, I guess, constituents?**  
 24 **I -- I don't know. What do you call the people**  
 25 **who affiliate themselves with One Wisconsin**

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1 **Institute?**  
 2 A We have online supporters.  
 3 **Q Okay. So how does one become an online supporter**  
 4 **of One Wisconsin Institute?**  
 5 A Signing up for our membership -- or for our  
 6 online list.  
 7 **Q And what does that get someone who signs up for**  
 8 **it?**  
 9 A Communications about things we think are  
 10 relevant.  
 11 **Q So it's as simple as just submitting your name**  
 12 **and e-mail address or just e-mail address?**  
 13 A E-mail address, zip code.  
 14 **Q Okay. You don't have to make a donation --**  
 15 **A No.**  
 16 **Q -- to One Wisconsin?**  
 17 A (Witness shakes head.)  
 18 **Q Do some people choose to make a donation?**  
 19 A Yes.  
 20 **Q Okay. And I guess is One Wisconsin Institute**  
 21 **funded mostly by very small donations?**  
 22 **MR. KAUL:** Objection. The -- I don't  
 23 have any objection to your asking about the types  
 24 of donations they have. How the funding is  
 25 distributed is where my objection is, I guess.

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1 So that's the objection.  
2 **BY MR. KAWSKI (CONTINUING):**  
3 **Q Okay. So, for example, is One -- you know how in**  
4 **campaigns candid -- some candidates currently in**  
5 **the presidential campaign like to tout -- tout.**  
6 **Their campaign is funded by a number of very**  
7 **small donations. Is One Wisconsin funded mostly**  
8 **by a large number of very small donations or a**  
9 **smaller number of very large donations?**  
10 **MR. KAUL:** And I'll object to the extent  
11 it's asking how the -- the amount of money is  
12 distributed since you're not a political  
13 candidate. It's a different inquiry. But you're  
14 welcome to talk about the types of donations that  
15 you get and where they -- they come from. Does  
16 that make sense?  
17 **THE WITNESS:** Clarify a little bit.  
18 **MR. KAUL:** Yeah. So --  
19 **MR. KAWSKI:** Do you want to take a break  
20 again, or do you want to keep going?  
21 **MR. KAUL:** Why don't we take just a very  
22 brief break.  
23 **MR. KAWSKI:** Okay.  
24 **MR. KAUL:** It'll just take one minute.  
25 **MR. KAWSKI:** Okay.

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1 (Recess.)  
2 **MR. KAUL:** So I'll put on the record, I  
3 was -- I was just instructing the witness -- my  
4 understanding is that the Institute regards those  
5 confidential as to exactly how the donations are  
6 distributed, meaning whether it's primarily from  
7 a large donor or primarily from small donors.  
8 But I've also instructed Mr. Ross that he should  
9 -- should answer to the extent that the question  
10 relates to the types of donors and whether there  
11 are a number of donors and that sort of thing.  
12 **MR. KAWSKI:** Okay. So if you can answer  
13 then.  
14 **THE WITNESS:** Can you repeat the  
15 question back, please?  
16 (Question read back.)  
17 A A large number of very small donations --  
18 **BY MR. KAWSKI (CONTINUING):**  
19 **Q Okay.**  
20 A -- to use your words.  
21 **Q Yes. Okay. So can you estimate how many**  
22 **donations?**  
23 A (Witness shakes head.)  
24 **Q No?**  
25 A Not with certainty.

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1 **Q Thousands?**  
2 A No. No.  
3 **Q Hundreds?**  
4 A Perhaps.  
5 **Q Dozens?**  
6 A I would -- hundreds is accurate.  
7 **Q Hundreds. Okay.**  
8 A Hundreds is accurate.  
9 **Q Okay. Has that always been the case?**  
10 A Yeah.  
11 **Q Okay. So over time -- you were going to say**  
12 **something else?**  
13 A There have been times where we've received larger  
14 -- a larger percentage of our support from larger  
15 donations. We've -- we've had -- we've had years  
16 where we have not had hundreds of donations.  
17 **Q Okay. But in the recent years, last two years,**  
18 **for example, have you had hundreds of donations**  
19 **in those years?**  
20 A Yes.  
21 **Q And from what types -- again, I -- I know I'm**  
22 **going to draw an objection perhaps. But what**  
23 **types of donors? Are they wealthy? Are they**  
24 **poor? Do you not know?**  
25 **MR. KAUL:** To some extent, I'm holding

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1 off because I guess -- is the question just about  
2 how well off the donors are?  
3 **MR. KAWSKI:** Yeah.  
4 **MR. KAUL:** You're welcome to answer  
5 that.  
6 A I -- I believe that we have donors who span the  
7 economic spectrum --  
8 **BY MR. KAWSKI (CONTINUING):**  
9 **Q Okay.**  
10 A -- I believe.  
11 **Q Okay. When donations come in as -- does the**  
12 **executive director know who's donating money?**  
13 A Not always.  
14 **Q No. Okay. Some is anonymous?**  
15 A Not anonymous.  
16 **Q No.**  
17 A I just don't know every donation --  
18 **Q I see.**  
19 A -- that comes into the organization.  
20 **Q Is it possible for the -- for the organization to**  
21 **accept anonymous donations?**  
22 A No.  
23 **Q No. Okay. So, if you got an anonymous donation**  
24 **as One Wisconsin, what would you have to do with**  
25 **it?**

<p>Deposition of Scot Ross - 4/22/16 Page 41</p> <p>1 A I don't know because I've never received one.</p> <p>2 <b>Q Okay. So in terms of this case, we talked about</b></p> <p>3 <b>diversion of resources already. Has One</b></p> <p>4 <b>Wisconsin had to divert resources towards paying</b></p> <p>5 <b>its attorneys?</b></p> <p>6 <b>MR. KAUL:</b> Objection. I just want</p> <p>7 clarification. Are you talking about with</p> <p>8 respect to a particular issue or in general?</p> <p>9 <b>MR. KAUSKI:</b> In this case.</p> <p>10 <b>MR. KAUL:</b> Okay. You can answer that.</p> <p>11 A I'm sorry. Could you --</p> <p>12 <b>BY MR. KAUSKI (CONTINUING):</b></p> <p>13 <b>Q My question was, has One Wisconsin had to divert</b></p> <p>14 <b>resources from its normal mission to paying its</b></p> <p>15 <b>attorneys in this case?</b></p> <p>16 A No.</p> <p>17 <b>Q No. Okay. So the attorneys are working pro</b></p> <p>18 <b>bono?</b></p> <p>19 <b>MR. KAUL:</b> Objection. That's a separate</p> <p>20 question. You can answer to the extent you know</p> <p>21 but --</p> <p>22 A I believe so.</p> <p>23 <b>BY MR. KAUSKI (CONTINUING):</b></p> <p>24 <b>Q Okay. You said the attorneys are working pro</b></p> <p>25 <b>bono?</b></p>	<p>Deposition of Scot Ross - 4/22/16 Page 43</p> <p>1 <b>MR. KAUL:</b> Before you answer, I'm going</p> <p>2 to object to any communications you had with</p> <p>3 attorneys about your involvement -- any</p> <p>4 communications with attorneys relating to your</p> <p>5 involvement in this case. You can, however,</p> <p>6 generally talk about, you know, your connection</p> <p>7 to these issues and -- and any other things</p> <p>8 unrelated to communications with attorneys about</p> <p>9 how you got involved in the case.</p> <p>10 A I mean, we generally -- you know, we have a -- we</p> <p>11 have developed a relatively high profile in terms</p> <p>12 of fighting back against the attacks on voter</p> <p>13 rights.</p> <p>14 <b>BY MR. KAUSKI (CONTINUING):</b></p> <p>15 <b>Q Okay. So was One Wisconsin approached by someone</b></p> <p>16 <b>to initiate this case?</b></p> <p>17 <b>MR. KAUL:</b> Objection to the extent that</p> <p>18 this relates to any communication with lawyers.</p> <p>19 You can answer if there is any answer about any</p> <p>20 communications with non-lawyers.</p> <p>21 <b>BY MR. KAUSKI (CONTINUING):</b></p> <p>22 <b>Q Did you have any communications with non-lawyers</b></p> <p>23 <b>about initiating this case?</b></p> <p>24 A No.</p> <p>25 <b>Q So -- and I don't think this is an objectionable</b></p>
<p>Deposition of Scot Ross - 4/22/16 Page 42</p> <p>1 A I am not paying the attorney.</p> <p>2 <b>Q Okay. That's the question. And -- and to be</b></p> <p>3 <b>clear, One Wisconsin is not paying its attorneys</b></p> <p>4 <b>in this case?</b></p> <p>5 A Yes.</p> <p>6 <b>Q Do you know who is paying the attorneys in this</b></p> <p>7 <b>case?</b></p> <p>8 A No.</p> <p>9 <b>Q Is someone as far as you know -- or as far as One</b></p> <p>10 <b>Wisconsin knows, paying the attorneys for the</b></p> <p>11 <b>plaintiffs in this case?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Okay. So as far as One Wisconsin knows, the</b></p> <p>14 <b>attorneys working for it in this case are working</b></p> <p>15 <b>for free?</b></p> <p>16 A I have no idea.</p> <p>17 <b>Q One Wisconsin itself has no idea?</b></p> <p>18 A I do not know how the attorneys are being paid.</p> <p>19 <b>Q But they are being paid?</b></p> <p>20 A I don't -- I don't know.</p> <p>21 <b>Q You don't know if they are being paid?</b></p> <p>22 A I don't know.</p> <p>23 <b>Q Okay. Fair enough. So how did One Wisconsin</b></p> <p>24 <b>come to get involved in this case?</b></p> <p>25 A Well, we have talked a lot about --</p>	<p>Deposition of Scot Ross - 4/22/16 Page 44</p> <p>1 <b>question. It's fair to say that the</b></p> <p>2 <b>communications were with lawyers then?</b></p> <p>3 <b>MR. KAUL:</b> You can answer that question.</p> <p>4 A Yes.</p> <p>5 <b>BY MR. KAUSKI (CONTINUING):</b></p> <p>6 <b>Q Okay. And so when did those discussions take</b></p> <p>7 <b>place?</b></p> <p>8 A I don't recall.</p> <p>9 <b>Q Was it in 2015 or sometime before that?</b></p> <p>10 A 2015.</p> <p>11 <b>Q Okay. So you understand this case was filed, I</b></p> <p>12 <b>think, in May 2015?</b></p> <p>13 A Mm-hmm.</p> <p>14 <b>Q Okay. So was it sometime at the beginning of</b></p> <p>15 <b>2015 that there were communications to initiate</b></p> <p>16 <b>this matter?</b></p> <p>17 A I'd say approximately.</p> <p>18 <b>Q Okay. Did it have any communication to the</b></p> <p>19 <b>timing of the U.S. Supreme Court's decision</b></p> <p>20 <b>deciding not to accept the Frank versus Walker</b></p> <p>21 <b>case for certiorari?</b></p> <p>22 A I -- I don't recall.</p> <p>23 <b>Q And that was March 23rd, 2015?</b></p> <p>24 A I don't recall.</p> <p>25 <b>Q Okay. In terms of what law changes spurred One</b></p>

<p>Deposition of Scot Ross - 4/22/16 Page 45</p> <p>1 <b>Wisconsin's interest in initiating this matter, what were they?</b></p> <p>2</p> <p>3 A Well, there have been a host of attacks on the right to vote in the State of Wisconsin. Everything from the Voter ID Law passing, the ending of weekend early voting, the severe restrictions on early voting, the designation -- designation that there would be set hours for early voting by individual entities, the ending of corroboration, the residency re -- restriction, the change in residency. That's all that I'm recalling off the bat.</p> <p>13 Q <b>Okay. So, I mean, there are a great number of laws challenged in this case. And some of them were enacted in 2011; right?</b></p> <p>14</p> <p>15</p> <p>16 A Yes, I believe.</p> <p>17 Q <b>At any point prior to 2015, did One Wisconsin Institute consider initiating a lawsuit to challenge those laws?</b></p> <p>18</p> <p>19 <b>MR. KAUL:</b> And, again, you can answer the question; and you can certainly answer the yes or no aspect of it. But don't provide any information about communications you had with attorneys.</p> <p>23</p> <p>24</p> <p>25 A Yes.</p>	<p>Deposition of Scot Ross - 4/22/16 Page 47</p> <p>1 related to the disparity between Department of Motor Vehicle Access in the State of Indiana and how that contrasted with the State of Wisconsin. We wanted to make sure that information was included.</p> <p>6 Q <b>Okay. And that was information that One Wisconsin itself researched?</b></p> <p>7</p> <p>8 A Yes.</p> <p>9 Q <b>Okay. And was -- One Wisconsin staff drafted the brief? And I -- when I say "brief" --</b></p> <p>10</p> <p>11 <b>MR. KAUL:</b> I'll -- I'll -- let me object to that question. To the extent that involves attorney work product or communications with attorneys, I'm going to instruct you not to answer. And I -- I believe that was a brief that was filed on behalf of an attorney, so I -- I believe it's all privileged. So unless there's some part of that answer that's not related to communications with an attorney or work with an attorney, I'm going to instruct you not to answer it in its entirety.</p> <p>22 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>23 Q <b>Okay. Did the research director for One Wisconsin Institute draft the brief that was filed in the Frank Versus Walker case?</b></p> <p>24</p> <p>25</p>
<p>Deposition of Scot Ross - 4/22/16 Page 46</p> <p>1 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>2 Q <b>Okay. So when did One Wisconsin consider filing the lawsuit to challenge some of these same laws that are challenged here?</b></p> <p>3</p> <p>4</p> <p>5 A I -- I believe 2011.</p> <p>6 Q <b>Okay. And so why didn't One Wisconsin file a lawsuit at that time?</b></p> <p>7</p> <p>8 <b>MR. KAUL:</b> And, again, same instruction. You can answer. But your -- any communications with attorneys, I'm going to instruct you not to provide an explanation about that information.</p> <p>10</p> <p>11</p> <p>12 A Okay. I think somebody else filed a suit.</p> <p>13 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>14 Q <b>Okay. So you felt it was not necessary?</b></p> <p>15</p> <p>16 A I believe.</p> <p>17 Q <b>Okay. You're -- One Wisconsin is aware there are a number of suits filed challenging voter ID, for example?</b></p> <p>18</p> <p>19 A Yes.</p> <p>20 Q <b>One Wisconsin, though, did take a role in serving as amicus in some of those cases?</b></p> <p>21</p> <p>22 A Yes.</p> <p>23 Q <b>And was that viewed as an alternative to initiating One Wisconsin's own lawsuit?</b></p> <p>24</p> <p>25 A We believed that based on research we had done</p>	<p>Deposition of Scot Ross - 4/22/16 Page 48</p> <p>1 <b>MR. KAUL:</b> I'm going to object to that question. So she was -- she works at both as a lawyer and as a research director; and, obviously, to the extent she was drafting a brief, she was acting in her capacity as a lawyer.</p> <p>6</p> <p>7 <b>MR. KAWSKI:</b> Okay. Fair enough.</p> <p>8 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>9 Q <b>We can move on from that topic because it's just more objections. Why don't we take a look at exhibit -- another exhibit. I don't know if you would have seen this before. Maybe not.</b></p> <p>10</p> <p>11</p> <p>12 <b>MR. KAWSKI:</b> Mark it as Number 2. (Exhibit 2 was marked.)</p> <p>13</p> <p>14 <b>THE WITNESS:</b> Thank you.</p> <p>15</p> <p>16 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>17 Q <b>Take a look at that. And once you've looked at both pages, let me know when -- when you're done.</b></p> <p>18</p> <p>19 A Yeah, I have.</p> <p>20 Q <b>Okay. What -- what is this document, if you know?</b></p> <p>21</p> <p>22 A This is the filing of the Department of Financial Institutions.</p> <p>23</p> <p>24 Q <b>And that's for One Wisconsin Institute, Inc.?</b></p> <p>25 A Yes.</p>

<p>Deposition of Scot Ross - 4/22/16 Page 49</p> <p>1 <b>Q And so on the second page, if you take a look</b>  2 <b>about halfway down, you see that there's an entry</b>  3 <b>effective date August -- or excuse me --</b>  4 <b>October 1st, 2007. It states, Delinquent.</b>  5 A Mm-hmm.  6 <b>Q What -- what caused One Wisconsin Institute to be</b>  7 <b>delinquent in its DFI filing?</b>  8 <b>MR. KAUL:</b> Object on relevance. You can  9 answer, if you can.  10 A I -- I don't recall.  11 <b>BY MR. KAWSKI (CONTINUING):</b>  12 <b>Q You don't recall. Were you with One Wisconsin</b>  13 <b>Institute at that time?</b>  14 A Yes.  15 <b>Q Okay. And then you see that, right below that,</b>  16 <b>it states, October 24th, 2007, restored to good</b>  17 <b>standing. Do you see that?</b>  18 A Mm-hmm.  19 <b>Q Were you involved as executive director or in any</b>  20 <b>capacity with One Wisconsin in restoring One</b>  21 <b>Wisconsin to good standing in DFI?</b>  22 <b>MR. KAUL:</b> I'll object -- I'll object to  23 this line as not relevant. But I'll -- with that  24 instruction, you can answer these questions.  25 A I don't recall.</p>	<p>Deposition of Scot Ross - 4/22/16 Page 51</p> <p>1 <b>some kind of controller or something that files</b>  2 <b>it?</b>  3 A Either our auditor or -- either our auditor  4 provides us the information that we then send in,  5 or someone in our office does that particular  6 report.  7 <b>Q Okay. When you say "auditor," what do you mean?</b>  8 <b>Is there, like, a firm you hire?</b>  9 A Yes.  10 <b>Q What is that firm?</b>  11 A Reilly, Penner.  12 <b>Q Okay. So is it, like, an accounting firm?</b>  13 A Yeah.  14 <b>Q Okay. Okay. We can set that one to the side.</b>  15 <b>We haven't talked about whether there's a board</b>  16 <b>yet of One Wisconsin. Is there a board?</b>  17 A Yes.  18 <b>Q And how many members?</b>  19 A I believe we currently have four members.  20 <b>Q Okay. And what is the -- what does the board do?</b>  21 A They approve the finan -- they review and improve  22 the financials. They review and improve our  23 minutes. They provide me assistance as I have --  24 as I need with executing my duties.  25 <b>Q Okay. And so are those -- those are just</b></p>
<p>Deposition of Scot Ross - 4/22/16 Page 50</p> <p>1 <b>BY MR. KAWSKI (CONTINUING):</b>  2 <b>Q Okay. And you see above that, it lists, Old</b>  3 <b>names?</b>  4 A Mm-hmm.  5 <b>Q And are these the -- the names that you're</b>  6 <b>referring to previously for One Wisconsin</b>  7 <b>Institute?</b>  8 A Yes.  9 <b>Q Those being Advancing Wisconsin Institute, Inc.,</b>  10 <b>Institute for One Wisconsin, Inc.?</b>  11 A Yes.  12 <b>Q Okay. I see on the front page -- we see the,</b>  13 <b>about halfway down, Annual report requirements.</b>  14 <b>Do you see that?</b>  15 A Yes.  16 <b>Q So One Wisconsin Institute files annual reports?</b>  17 A Yes.  18 <b>Q Do you compose those, or do you have a contractor</b>  19 <b>that does that?</b>  20 A I believe we -- we -- I believe -- there are a  21 number of things that we have to file, and I'm --  22 I'm not sure if that particular -- or this  23 particular one is filed in-house or filed by our  24 auditor.  25 <b>Q Okay. So you -- perhaps there's an accountant or</b></p>	<p>Deposition of Scot Ross - 4/22/16 Page 52</p> <p>1 <b>volunteers?</b>  2 A Yeah.  3 <b>Q Okay. And do they serve a certain term on the</b>  4 <b>board?</b>  5 A We have a -- I believe we have a yearly re-up, a  6 yearly process.  7 <b>Q Okay. How does one become a board member?</b>  8 A The board handles reaching out to -- to folks.  9 <b>Q Has the number of board members remained stable</b>  10 <b>over time, or have there been more or less?</b>  11 A For the most part. There have -- I -- I don't  12 know that we've ever had more than four or five.  13 <b>Q Okay. And how frequent are the board meetings?</b>  14 A Every two months.  15 <b>Q Okay. And the minutes are taken?</b>  16 A Yes.  17 <b>Q And are they confidential, or are they made</b>  18 <b>public?</b>  19 A Yes.  20 <b>Q They are confidential?</b>  21 A Yes.  22 <b>Q Okay. Why are they maintained as confidential?</b>  23 A It's our right.  24 <b>Q Okay. There's a secretary that prepares the</b>  25 <b>minutes?</b></p>

<p>Deposition of Scot Ross - 4/22/16 Page 53</p> <p>1 A Yes.</p> <p>2 <b>Q Okay. Are the minutes shared with the executive</b></p> <p>3 <b>director?</b></p> <p>4 A Yes.</p> <p>5 <b>Q Okay. Shared with the other staff as well?</b></p> <p>6 A No.</p> <p>7 <b>Q Okay. Just the executive director?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Are the minutes shared with the executive</b></p> <p>10 <b>director of One Wisconsin Now?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Okay. Are they shared with anyone else outside</b></p> <p>13 <b>of One Wisconsin Institute?</b></p> <p>14 A No.</p> <p>15 <b>Q Okay. Are they shared with any other person</b></p> <p>16 <b>affiliated with One Wisconsin Now?</b></p> <p>17 A Yes.</p> <p>18 <b>Q And who -- who are they shared with?</b></p> <p>19 A The board of directors of One Wisconsin Now.</p> <p>20 <b>Q Okay. Are the board of directors for One</b></p> <p>21 <b>Wisconsin Now the same individuals that are on</b></p> <p>22 <b>the board of directors for One Wisconsin</b></p> <p>23 <b>Institute?</b></p> <p>24 A No.</p> <p>25 <b>Q Okay. And why is that?</b></p>	<p>Deposition of Scot Ross - 4/22/16 Page 55</p> <p>1 A Yes.</p> <p>2 <b>Q And what is it?</b></p> <p>3 A It looks to be the About page of our Institute</p> <p>4 website.</p> <p>5 <b>Q Okay. And it states, One Wisconsin Institute</b></p> <p>6 <b>staff are experts in opposition -- opposition and</b></p> <p>7 <b>educational research. Do you see that?</b></p> <p>8 A Mm-hmm.</p> <p>9 <b>Q What is opposition research?</b></p> <p>10 A It means in contradiction to a particular</p> <p>11 position.</p> <p>12 <b>Q Okay. So what example would you -- could you</b></p> <p>13 <b>give about something you've taken -- or conducted</b></p> <p>14 <b>opposition research?</b></p> <p>15 A Sure. Student loan debt.</p> <p>16 <b>Q Okay.</b></p> <p>17 A We believe that you should be able to refinance</p> <p>18 your student loan just like you can your</p> <p>19 mortgage, something you're currently denied the</p> <p>20 ability to do.</p> <p>21 <b>Q Okay.</b></p> <p>22 A So we've researched that issue.</p> <p>23 <b>Q Okay. Opposition to political candidates?</b></p> <p>24 A No, not from the Institute.</p> <p>25 <b>Q Not from the Institute. But from -- One</b></p>
<p>Deposition of Scot Ross - 4/22/16 Page 54</p> <p>1 A We maintain two separate board of directors.</p> <p>2 <b>Q Okay. Do they hold meetings -- the two entities,</b></p> <p>3 <b>One Wisconsin Institute and One Wisconsin Now,</b></p> <p>4 <b>hold meetings at different times?</b></p> <p>5 A Yes.</p> <p>6 <b>Q Okay. And is there any overlap between board</b></p> <p>7 <b>members between the two boards, meaning</b></p> <p>8 <b>individuals are on the same -- on each board?</b></p> <p>9 A No.</p> <p>10 <b>Q Okay. And why is that?</b></p> <p>11 A To maintain two separate organizations.</p> <p>12 <b>Q Okay. And has that always been the case?</b></p> <p>13 A As long as I have been at One Wisconsin, yes.</p> <p>14 <b>Q Okay. Do you --</b></p> <p>15 A I cannot speak to earlier.</p> <p>16 <b>Q Okay. Let's take a look at one -- another</b></p> <p>17 <b>exhibit. This is just something I pulled from</b></p> <p>18 <b>the onewisconsininstitute.org website, I think.</b></p> <p>19 A Uh-huh.</p> <p>20 <b>MR. KAWSKI:</b> So mark this as Number 3,</p> <p>21 please.</p> <p>22 (Exhibit 3 was marked.)</p> <p>23 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>24 <b>Q All right. So take a look at this. And do you</b></p> <p>25 <b>recognize what it is?</b></p>	<p>Deposition of Scot Ross - 4/22/16 Page 56</p> <p>1 <b>Wisconsin Now does opposition research as well?</b></p> <p>2 A We do issue advocacy, and so we do</p> <p>3 research-based. Our -- our mission is driven by</p> <p>4 research --</p> <p>5 <b>Q Okay.</b></p> <p>6 A -- which leads us to information.</p> <p>7 <b>Q Okay. So the -- the Instit -- One Wisconsin</b></p> <p>8 <b>Institute does not do opposition research and</b></p> <p>9 <b>opposition to political candidates?</b></p> <p>10 A No.</p> <p>11 <b>Q Or issue any public press releases in opposition</b></p> <p>12 <b>to political candidates?</b></p> <p>13 A No.</p> <p>14 <b>Q I see the -- the deputy director of One Wisconsin</b></p> <p>15 <b>Institute is Mike Browne?</b></p> <p>16 A Mm-hmm.</p> <p>17 <b>Q Is he also affiliated with One Wisconsin Now?</b></p> <p>18 A Yes.</p> <p>19 <b>Q And what is his role for One Wisconsin Now?</b></p> <p>20 A He's the deputy director of One Wisconsin Now.</p> <p>21 <b>Q Okay. So in his role of deputy director of One</b></p> <p>22 <b>Wisconsin Now, does Mr. Browne issue press</b></p> <p>23 <b>releases in opposition to political candidates?</b></p> <p>24 A No.</p> <p>25 <b>Q He does not. Okay.</b></p>

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1 A No.

2 **Q So who would be doing that for One Wisconsin Now?**

3 A One Wisconsin Now does not oppose or support

4 any --

5 **Q Right.**

6 A -- candidates for elected office.

7 **Q Issue advocacy. Okay. So when One Wisconsin In**

8 **-- One Wisconsin Now issues a release about a**

9 **States Supreme Court candidate, for example,**

10 **would that be something Mr. Browne would do?**

11 A Potentially.

12 **Q Okay. Has One Wisconsin Institute ever been**

13 **accused of engaging in expressed advocacy?**

14 A No, not to my knowledge.

15 **Q Okay. Not to your knowledge. What about One**

16 **Wisconsin Now? Have they -- has that entity been**

17 **accused of -- been engaged in expressed advocacy?**

18 A Not to my -- well, not to my know -- we may have

19 been accused of it. We have never done it.

20 **Q Okay. Do you recall the substance of that**

21 **accusation?**

22 A No.

23 **Q Okay. So we haven't talked about the -- we've**

24 **talked about the executive director, deputy**

25 **director, research director of One Wisconsin**

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1 **Institute. We have not talked about of the**

2 **program director or online director.**

3 A Mm-hmm.

4 **Q Could you describe what Ms. Eicher does as**

5 **program director?**

6 A Yeah. She helps runs some of our programs that

7 we do.

8 **Q Okay. For example, what programs does she help**

9 **run?**

10 A Student loan debt.

11 **Q Okay.**

12 A She does work with voter rights.

13 **Q Okay. Any others?**

14 A Those are two main programs.

15 **Q Okay. And then Mr. Oliphant, the online**

16 **director, what -- what is his duty?**

17 A He does our graphic design. He designed our

18 website. He executes the distribution of our

19 many communication materials.

20 **Q Okay. So is he sort of a tech expert also?**

21 A Somewhat, yes.

22 **Q Okay. And all of these five employees, do they**

23 **all engage in the opposition research mission of**

24 **One Wisconsin Institute?**

25 A I don't believe so.

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1 **Q No. Which ones do?**

2 A I'm going to guess again -- I would say that -- I

3 would say -- let me say this. I would say that

4 all of our team has looked at issues facing on

5 the State of Wisconsin, provided me their --

6 their input on those issues.

7 **Q Okay.**

8 A So let me -- I'll -- I will say that.

9 **Q Okay. So all -- all of the five staff have**

10 **engaged in issue research?**

11 A Yeah.

12 **Q Okay. The -- at the top there, there's -- there**

13 **are two sentences. The second is, We are the**

14 **progressive information hub for allied**

15 **organizations and tens of thousands activists**

16 **across Wisconsin. Do you see that?**

17 A Mm-hmm.

18 **Q What does -- what does allied organizations mean?**

19 A Well, there are a lot of progressive

20 organizations who we work with.

21 **Q Okay. For example, which ones do you work with?**

22 A We've worked with Citizen Action of Wisconsin.

23 We've worked with labor unions. We've worked

24 with civil rights groups. We've worked with

25 voter rights groups. We've worked with good

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1 government groups.

2 **Q Have you ever worked with the Republican party of**

3 **Wisconsin?**

4 A No.

5 **Q Have -- have you reached out to them, or have**

6 **they reached out to you to work together on**

7 **anything?**

8 A No.

9 **Q Okay. Why do you think that is?**

10 A I don't know.

11 **Q Would it be something you would be in favor of?**

12 A I don't know if the Republican party's going to

13 call and ask us for our advice on issues.

14 **Q But partnering in some project, is that a**

15 **possibility?**

16 A I would love to partner. I would -- I would -- I

17 would have no objection to partnering with

18 somebody who wants to make Wisconsin with

19 eco-economic opportunity for all.

20 **Q Okay. You mentioned some organizations that are**

21 **allied. Would that include the League of Women**

22 **Voters?**

23 A Yeah. We've worked with the League of Women

24 Voters.

25 **Q Election protection?**



<p>Deposition of Scot Ross - 4/22/16 Page 61</p> <p>1 A Yes.</p> <p>2 <b>Q Fair Elections Legal Network?</b></p> <p>3 A Yes.</p> <p>4 <b>Q United Wisconsin?</b></p> <p>5 A Yes.</p> <p>6 <b>Q Common Cause?</b></p> <p>7 A Mm-hmm.</p> <p>8 <b>Q Wisconsin Voices?</b></p> <p>9 A Mm-hmm.</p> <p>10 <b>Q What is Wisconsin Voices?</b></p> <p>11 A I believe Wisconsin Voices is a -- sort of a</p> <p>12 convening of a lot of different progressive</p> <p>13 organizations, the 501(c)(3) community.</p> <p>14 <b>Q Okay. So is it itself a separate entity?</b></p> <p>15 A (Witness shakes head.)</p> <p>16 <b>Q Don't know?</b></p> <p>17 A I do not know what their -- they do.</p> <p>18 <b>Q Does this include allied organizations that are</b></p> <p>19 <b>outside of the State of Wisconsin?</b></p> <p>20 A We work with organizations outside the State of</p> <p>21 Wisconsin.</p> <p>22 <b>Q Could you give us some examples?</b></p> <p>23 A We work with the ProgressNow Network.</p> <p>24 <b>Q Okay. Worked with ACLU of Wisconsin?</b></p> <p>25 A Yes.</p>	<p>Deposition of Scot Ross - 4/22/16 Page 63</p> <p>1 <b>Q Okay. Take a look at those and if you can flip</b></p> <p>2 <b>through them. When you're done, let me know.</b></p> <p>3 A Okay.</p> <p>4 <b>Q Okay. So what is Exhibit 4?</b></p> <p>5 A Plaintiffs' responses to Defendants' first set of</p> <p>6 requests for admission.</p> <p>7 <b>Q Have you seen it before today?</b></p> <p>8 A Perhaps.</p> <p>9 <b>Q Okay.</b></p> <p>10 <b>MR. KAUL:</b> And I'll -- that's -- that's</p> <p>11 fine.</p> <p>12 <b>BY MR. KAWSKI (CONTINUING):</b></p> <p>13 <b>Q Okay. And then what is Exhibit 5?</b></p> <p>14 A Plaintiffs' responses to Defendants' second set</p> <p>15 of interrogatories.</p> <p>16 <b>Q And have you seen that one before today?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Okay. So you previously testified that One</b></p> <p>19 <b>Wisconsin Institute has no members; correct?</b></p> <p>20 A Yes.</p> <p>21 <b>Q Okay. And so, if you look at Exhibit 4, for</b></p> <p>22 <b>example, on page three, you see there's a request</b></p> <p>23 <b>for admission number three?</b></p> <p>24 A Mm-hmm.</p> <p>25 <b>Q And it asks a question about each member of One</b></p>
<p>Deposition of Scot Ross - 4/22/16 Page 62</p> <p>1 <b>Q Okay. All right. Let's see. I don't think</b></p> <p>2 <b>there's anything else on this one.</b></p> <p>3 A I'm going to jump up and get a glass of water.</p> <p>4 <b>Q Sure.</b></p> <p>5 <b>MR. KAUL:</b> Actually, we -- yeah. I was</p> <p>6 just going to say, we've been going for --</p> <p>7 <b>MR. KAWSKI:</b> Do you want to take a</p> <p>8 break?</p> <p>9 <b>MR. KAUL:</b> -- maybe an hour and ten?</p> <p>10 Yeah. Why don't we take a break.</p> <p>11 <b>MR. KAWSKI:</b> Okay. Let's take a break.</p> <p>12 (Recess.)</p> <p>13 <b>MR. KAWSKI:</b> Back on the record, please.</p> <p>14 So the next two are exhibits that kind of go to</p> <p>15 together. All right. So this is Josh's copy, I</p> <p>16 think. Here you go. And then these are the</p> <p>17 witness copies. They can be 3 and 4.</p> <p>18 <b>THE REPORTER:</b> It's 4 and 5.</p> <p>19 <b>MR. KAWSKI:</b> 4 and 5. That would make</p> <p>20 more sense.</p> <p>21 <b>MR. KAUL:</b> I'm sorry. Which is which?</p> <p>22 <b>MR. KAWSKI:</b> 4 is the admissions; 5 is</p> <p>23 the interrogatories.</p> <p>24 (Exhibits 4 and 5 were marked.)</p> <p>25 <b>BY MR. KAWSKI (CONTINUING):</b></p>	<p>Deposition of Scot Ross - 4/22/16 Page 64</p> <p>1 <b>Wisconsin Institute?</b></p> <p>2 A Yes.</p> <p>3 <b>Q And the response given below that states,</b></p> <p>4 <b>Plaintiff One Wisconsin Institute, Inc., does not</b></p> <p>5 <b>have members as defined in a statute?</b></p> <p>6 A Yes.</p> <p>7 <b>Q So that's consistent with what you're saying</b></p> <p>8 <b>today, is that One Wisconsin Institute, Inc., has</b></p> <p>9 <b>no members?</b></p> <p>10 A Yes.</p> <p>11 <b>Q Okay. And then we can put one to the side.</b></p> <p>12 <b>Exhibit 5, if you look at page eleven -- I guess</b></p> <p>13 <b>10 and eleven -- top of page ten, interrogatory</b></p> <p>14 <b>number 18 states --</b></p> <p>15 A I'm sorry.</p> <p>16 <b>Q Page ten?</b></p> <p>17 A Page ten.</p> <p>18 <b>Q And it's interrogatory number 18.</b></p> <p>19 A Yes.</p> <p>20 <b>Q See, it says, Identify by name and current</b></p> <p>21 <b>address all members of One Wisconsin Institute;</b></p> <p>22 <b>and then it goes on to say, Who lack a form of</b></p> <p>23 <b>identification listed in a statute. Do you see</b></p> <p>24 <b>that?</b></p> <p>25 A Yes.</p>

<p>Deposition of Scot Ross - 4/22/16 Page 65</p> <p>1 Q And, if you go to page eleven, the response given 2 is, Plaintiff One Wisconsin Institute, Inc., does 3 not have, quote, members, end quote, as defined 4 in a state statute. Do you see that? 5 A Yes. 6 Q Again, that's consistent with how you've 7 testified today, that One Wisconsin Institute has 8 no members? 9 A Yes. 10 Q Okay. We can set that to the side. All right. 11 The next exhibit is just a press release, and 12 this is Exhibit Number 6. Go ahead. 13 (Exhibit 6 was marked.) 14 BY MR. KAWSKI (CONTINUING): 15 Q Take a look at that one, and let me know when 16 you're done looking at it. 17 A Okay. 18 Q What is this exhibit? 19 A This appears to be a press release from One 20 Wisconsin Institute. 21 Q Okay. And it was issued on February 29th, 2016? 22 A According to what this paper says. 23 Q Okay. And do you remember this press release? 24 A Not particularly. I -- I -- not particularly. 25 Q Okay. So did the executive director draft this</p>	<p>Deposition of Scot Ross - 4/22/16 Page 67</p> <p>1 Q Okay. And so is it One Wisconsin's understanding 2 that the extraordinary proof petition process was 3 in place when the State Supreme Court entered its 4 decision? 5 A According to this release. 6 Q Okay. And then the next paragraph states, An 7 internal DMV analysis found an error rate of 8 27 percent. Do you see that? 9 A Yes. 10 Q What does that mean, error rate of 27 percent? 11 MR. KAUL: Objection. You can answer to 12 the extent that you know. 13 A That's what I understand the error rate was. 14 BY MR. KAWSKI (CONTINUING): 15 Q Error rate of what? 16 MR. KAUL: Again, objection to the 17 extent that you don't know. But you're welcome 18 to answer to the extent that you do. Foundation 19 is the proper way to phrase that objection. 20 MR. KAWSKI: Okay. 21 A The -- basically, that one in four petitions to 22 obtain the ID under the extraordinary proof 23 process were mishandled between March and August 24 of 2015. 25 BY MR. KAWSKI (CONTINUING):</p>
<p>Deposition of Scot Ross - 4/22/16 Page 66</p> <p>1 press release? 2 A No. 3 Q Would Mr. Browne have drafted it? 4 A Yes. 5 Q Okay. And so you see the fifth paragraph -- 6 A Yes. 7 Q -- states, The State Supreme Court held that the 8 DMV -- 9 A Wait. 10 Q -- had to exercise its discretion? 11 A I'm sorry. Where? 12 Q Fifth paragraph. 13 MR. KAUL: It -- it starts in the middle 14 of the paragraph. 15 BY MR. KAWSKI (CONTINUING): 16 Q The State Supreme Court held -- 17 A Yes. 18 Q Okay. So it states, The State Supreme Court held 19 that the DMV had to exercise its discretion under 20 the quote, extraordinary proof, end quote, 21 petition process? 22 A Mm-hmm. 23 Q Is it One Wisconsin's position that that is an 24 accurate statement? 25 A Yes.</p>	<p>Deposition of Scot Ross - 4/22/16 Page 68</p> <p>1 Q And what did -- what did One Wisconsin Institute 2 mean by mishandled? 3 A That they -- that they were not brought to a 4 conclusion which allowed somebody to get the ID 5 they needed. 6 Q Okay. Would the executive director have signed 7 off on this press release before it went out? 8 A Not necessarily. 9 Q Okay. So the deputy director has the authority 10 to issue press releases for One Wisconsin 11 Institute? 12 A Yes. 13 Q Okay. Without the executive director's 14 oversight? 15 A Yes. 16 Q Okay. We can set that one to the side. Let's 17 just talk a little bit about the April 2016 18 election. What activities did One Wisconsin 19 Institute engage in to help get out the vote for 20 that election? 21 A Golly, I don't recall. 22 Q Any activities? 23 A I don't recall. 24 Q Okay. If there were any activities, what -- what 25 area of the state were they focused in?</p>

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1 A Generally, we don't treat any part of the state  
2 differently than another --

3 **Q Okay.**

4 A -- for encouraging to people go out and exercise  
5 their right to vote.

6 **Q Okay. Did One Wisconsin Institute partner with  
7 any other organizations to get out the vote for  
8 April 2016?**

9 A I don't recall.

10 **Q Don't recall?**

11 A I don't recall.

12 **Q Okay. Even though it was only weeks ago?**

13 A Yeah. I just don't -- I don't necessarily know  
14 what we did related to that with --

15 **Q Okay.**

16 A -- with One Wisconsin Institute.

17 **Q Okay. So does One Wisconsin Institute follow the  
18 -- I guess, the results of elections?**

19 A Not necessarily. It depends.

20 **Q Read the news about, like, turnout numbers?**

21 A Yeah.

22 **Q Is One Wisconsin Institute aware of the level of  
23 voter turnout for the April 2016 election?**

24 A I'm aware of it.

25 **Q Okay. And what was that turnout?**

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1 A It was around 2 million votes.

2 **Q Okay. Was that high for a presidential election  
3 -- or excuse me -- presidential primary?**

4 A I think it was -- there have been -- I think  
5 there have been election -- yeah. I think it's  
6 -- it was a -- it was a decent turnout.

7 **Q Okay. Was it the highest turnout for a  
8 presidential primary in Wisconsin since 1972?**

9 A I heard that.

10 **Q Okay. Would it be a surprise to One Wisconsin  
11 Institute that One Wisconsin Institute's expert  
12 witness, Dr. Barry Burden, called the turnout  
13 numbers astounding?**

14 **MR. KAUL:** Objection. But you can  
15 answer.

16 A No.

17 **BY MR. KAWSKI (CONTINUING):**

18 **Q So it's -- that's a good word to use to describe  
19 the turnout?**

20 A I don't know.

21 **Q Okay. Given that One Wisconsin Institute is  
22 challenging these laws that were enacted in the  
23 last five years, is it surprising to One  
24 Wisconsin Institute that turnout surged over the  
25 time period these laws were implemented?**

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1 A I think that --

2 **THE WITNESS:** Can you repeat the  
3 question, please?  
4 (Question read back.)

5 A I don't know. You'd have to define "surge."

6 **BY MR. KAWSKI (CONTINUING):**

7 **Q Okay. That it -- I guess that it increased.**

8 A We have more human beings in the State of  
9 Wisconsin.

10 **Q And what basis for that knowledge does One  
11 Wisconsin Institute have?**

12 **MR. KAUL:** I'm going to object to -- on  
13 just vagueness grounds.

14 **BY MR. KAWSKI (CONTINUING):**

15 **Q I guess what -- how does One Wisconsin Institute  
16 know that there are more human beings in  
17 Wisconsin than there were five years ago?**

18 A It is an assumption based on increased  
19 population.

20 **Q Okay. Let's talk about a couple of proposed or,  
21 actually, enacted changes to the law.**

22 A Okay.

23 **Q Is One Wisconsin Institute familiar with the move  
24 towards online voter registration?**

25 A Somewhat.

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1 **Q Okay. And what -- what's One Wisconsin's  
2 understanding of it?**

3 A As I understand the -- there has been some move  
4 towards having some voter -- some online voter  
5 registration but while also denying the ability  
6 of people to do registration drives -- of  
7 organizations to do registration drives.

8 **Q And so does One Wisconsin Institute support or  
9 oppose this new scheme?**

10 A I do not -- One Wisconsin Institute does not  
11 support the law change that was made.

12 **Q Okay. And then, if there were a proposal to  
13 eliminate same-day voter registration, would One  
14 Wisconsin Institute support or oppose that?**

15 A Oppose that.

16 **Q Okay. And then, if there were an affidavit  
17 exception procedure to the voter -- voter ID law,  
18 would One Wisconsin Institute support or oppose  
19 that?**

20 A You would have to --

21 **MR. KAUL:** You were going to raise my  
22 objection, so I'll let you do it.

23 A You'd have to explain that.

24 **BY MR. KAWSKI (CONTINUING):**

25 **Q Okay. So does One Wisconsin understand the**

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1 affidavit exception procedure that the State of  
 2 Indiana has?  
 3 A No.  
 4 Q Okay. Then it's going to be hard for me to  
 5 describe. Let me take a look at my notes. Let's  
 6 go off the record; and I don't think I have much  
 7 more, if anything.  
 8 MR. KAUL: Sure. And yeah -- like I  
 9 said, I will actually have, like, under five  
 10 minutes. It'll be similar as this morning. So  
 11 let's step out for a second.  
 12 (Recess.)  
 13 MR. KAUSKI: Okay. Back on the record,  
 14 please. I just have a couple of questions.  
 15 BY MR. KAUSKI (CONTINUING):  
 16 Q You -- do you know when the trial is in this  
 17 case?  
 18 A I thought May 11th -- May 16th.  
 19 Q May 16th. Yeah. Close enough. It's for -- it's  
 20 for two weeks in May. Do you know if you're  
 21 available to testify at trial live during those  
 22 times?  
 23 A Yeah.  
 24 MR. KAUSKI: Okay. That's my last  
 25 question.

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1 A Absolutely not.  
 2 MR. KAUL: Okay. That's all I have.  
 3 MR. KAUSKI: I have nothing further.  
 4 (Adjourned at 2:30 p.m.)  
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1 MR. KAUL: And I'm just very briefly  
 2 going to ask you to follow up on one topic.  
 3 EXAMINATION  
 4 BY MR. KAUL:  
 5 Q You were asked some questions before about what  
 6 One Wisconsin Institute focuses on with respect  
 7 to voter fraud; is that right?  
 8 A Yes.  
 9 Q Okay. And you -- you talked specifically about  
 10 voter impersonation fraud; right?  
 11 A Yes.  
 12 Q Okay. Can you explain why you focus on voter  
 13 impersonation fraud?  
 14 A Yes, because that has been the fundamental --  
 15 that's -- that's been the -- because voter ID has  
 16 been so prevalent as a driving force in terms of  
 17 a lot of the attacks on voter rights, in-person  
 18 -- voter ID, the only thing -- it is our belief  
 19 the only thing that it can prevent is in-person  
 20 voter fraud -- in-person voter impersonation.  
 21 And so we focused on that.  
 22 Q Do you have any dispute to say, like, ballot box  
 23 stuffing is voter fraud?  
 24 A None whatsoever.  
 25 Q How about vote -- vote buying?

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1 STATE OF WISCONSIN )  
 2 COUNTY OF DANE ) ss  
 3 )  
 4 I, Paula Thompson, a Notary Public in and for the  
 5 State of Wisconsin, do hereby certify that the  
 6 foregoing deposition was taken before me at  
 7 Perkins Coie, LLP, One East Main Street, Suite 201,  
 8 City of Madison, County of Dane, and State of  
 9 Wisconsin, on the 22nd day of April, 2016; that it  
 10 was taken at the request of the Defendants, upon  
 11 verbal interrogatories; that it was taken in  
 12 shorthand by me, a competent court reporter and  
 13 disinterested person, approved by all parties in  
 14 interest and thereafter converted to typewriting  
 15 using computer-aided transcription; that said  
 16 deposition is a true record of the deponent's  
 17 testimony; that the deposition was taken pursuant  
 18 to Notice; that said Scot Ross on behalf of One  
 19 Wisconsin Institute, Inc., before examination was  
 20 sworn by me to testify to the truth, the whole truth,  
 21 and nothing but the truth relative to said cause.  
 22 Dated April 29th, 2016.  
 23  
 24  
 25

Notary Public  
 In and for the State of Wisconsin

	75:4	19;22:5;25:7,22;26:5, 6;29:24;37:11	away (5) 23:6,11;25:5,23; 26:10	12:1;51:15,16,20; 52:4,7,8,9,13;53:19,20, 22;54:1,6,8
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