

# **ATTACHMENT A**

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

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RUTHELLE FRANK, et al.,

Plaintiffs,

v.

Case No. 11-C-1128

GOVERNOR SCOTT WALKER, et al.,

Defendants.

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**DEFENDANTS' SUPPLEMENTAL DISCLOSURES**

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Defendants, by their undersigned counsel, hereby make the following supplemental disclosures as required by Federal Rule of Civil Procedure 26(e).

Additional non-parties that may have discoverable information pertaining to Plaintiffs' claims and Defendants' defenses include, but are not limited to, the following:

1. Sue Ertmer, Winnebago County Clerk, may have discoverable information regarding the implementation of voter photo identification requirements in Wisconsin, the State interests that support voter photo identification requirements, the incidence and threat of voter and/or election fraud at polling places, whether a voter photo identification requirement would improve the integrity of elections and instill confidence in voters, and whether a voter photo identification requirement would prevent or deter voter or election fraud. She can be reached through Defendants' counsel.

2. Jeannette Merten, Town of Oshkosh, may have discoverable information regarding the implementation of voter photo identification requirements in Wisconsin, the State interests that support voter photo identification requirements, the incidence and threat of voter and/or election fraud at polling places, whether a voter photo identification requirement would improve the integrity of elections and instill confidence in voters, and whether a voter photo identification requirement would prevent or deter voter or election fraud. She can be reached through Defendants' counsel.

3. Edgar Rosado, Wisconsin Department of Transportation ("DOT"), may have discoverable information regarding the requirements to obtain a Wisconsin driver license or state identification card and the process to obtain such licenses and cards from DOT. He can be reached through Defendants' counsel. Mr. Rosado was deposed in the instant case.

4. Janet Turja, DOT, may have discoverable information regarding the requirements to obtain a Wisconsin driver license or state identification card and the process to obtain such licenses and cards from DOT. She can be reached through Defendants' counsel. Ms. Turja was deposed in the instant case.

5. Bruce Landgraf, Milwaukee County Assistant District Attorney, may have discoverable information concerning investigations of voter fraud. Plaintiffs this case disclosed ADA Landgraf in their initial disclosures.

6. Michael Sandvick, a member of the Milwaukee Police Department's Special Investigations Unit (retired), completed an examination of voter fraud in the 2004 Presidential election. He may have discoverable information regarding

investigations of voter fraud, which was documented in the Report of the Investigation into the November 2, 2004 General Election in the City of Milwaukee, *available* *at* [http://media2.620wtmj.com/breakingnews/ElectionResults\\_2004\\_VoterFraudInvestigation\\_MPD-SIU-A2474926.pdf](http://media2.620wtmj.com/breakingnews/ElectionResults_2004_VoterFraudInvestigation_MPD-SIU-A2474926.pdf). Defendants believe that Detective Sandvick is represented by Richard M. Esenberg of the Wisconsin Institute for Law and Liberty.

Defendants reserve the right to use the testimony of other witnesses whose identity may be subsequently learned through discovery or other means. Defendants reserve the right to further supplement these disclosures pursuant to Federal Rule of Civil Procedure 26(e).

Dated this 12th day of August, 2013.

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