

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

RUTHELLE FRANK, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SCOTT WALKER, in his official capacity as
Governor of the State of Wisconsin, et al.,

Defendants.

Civil Action No. 2:11-cv-01128 (LA)

DECLARATION OF SEAN J. YOUNG

I, Sean J. Young, pursuant to 28 U.S.C. § 1749, hereby declare as follows: I am an attorney for the Plaintiffs in the above-captioned action. I submit this Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order and Leave to File Supplemental Pleading.

1. Attached hereto as Exhibit 1 are the Declarations of proposed Plaintiff Andrew Voegele.

2. Attached hereto as Exhibit 2 is a copy of the Supplemental Pleading which Plaintiffs seek leave to file.

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

Executed on November 8, 2016.

/s/ Sean J. Young
SEAN J. YOUNG
American Civil Liberties Union Foundation, Inc.
125 Broad Street, 18th Floor
New York, NY 10004
(212) 284-7359
syoung@aclu.org

Attorney for Plaintiffs

DECLARATION OF ANDREW VOEGELE

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

1. I make this Declaration on my own personal knowledge.
2. I am a citizen of the United States of America and am 18 years of age or older. I moved to Prescott, Wisconsin from Minnesota in August 2016. Prescott is right on the border between Wisconsin and Minnesota, and about a 15-20 minute drive to Minneapolis, Minnesota.
3. I am not serving a term of incarceration, parole, or probation for a felony conviction. My right to vote has not been taken away by court order.
4. I moved from Minnesota to Prescott, Wisconsin in August because housing became too expensive in Minnesota. I am a school teacher and I commute to a suburb in Minneapolis, Minnesota every weekday, which is about a 15-20 minute drive. I also drive in Minnesota sometimes on weekends. I grew up in Minnesota and have family there.
5. I knew that Wisconsin had a proof of residence requirement to register to vote, but I did not know that Wisconsin had a voter ID law until I arrived at the polling place on November 8, 2016. The poll workers called the Wisconsin Election Commission on my behalf to confirm what forms of photo identification were acceptable for voting, and I do not have any of the kinds of ID. I have a United States passport but it expired before November 2014. I also have an unexpired Minnesota driver's license.
6. I registered to vote in Wisconsin and then cast a provisional ballot because I did not have acceptable ID.
7. I do not want to surrender my Minnesota driver's license because I still drive in Minnesota and commute daily there. I live in Prescott, Wisconsin and see myself living here for

the foreseeable future and thus consider myself a resident of Wisconsin for voting purposes, but I drive in Minnesota and may wish to return there someday. A Wisconsin driver's license also costs \$34, which I do not want to pay to vote.

8. Unless this Court intervenes, my provisional ballot will not be counted.

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

Executed on November 8, 2016

/s/ Andrew Voegele

Andrew Voegele

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

RUTHELLE FRANK, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SCOTT WALKER, in his official capacity as
Governor of the State of Wisconsin, et al.,

Defendants.

Civil Action no. 2:11-cv-01128(LA)

SUPPLEMENTAL COMPLAINT

Plaintiffs bring this supplemental complaint to allege the following:

1. Since the filing of the original and First Amended Complaint and the prior Supplemental Complaint, Andrew Voegele, who lacks accepted photo ID for voting, have been harmed by Wisconsin's voter ID law.
2. Andrew Voegele is an eligible Wisconsin voter who will be disenfranchised in the November 2016 general elections because of Wisconsin's voter ID law unless this Court immediately intervenes. Voegele moved to Prescott, Wisconsin from Minnesota in August 2016 and did not learn about Wisconsin's voter ID law until he arrived at the polls on November 8, 2016. Because he does not have an acceptable photo ID for voting, he was compelled to cast a provisional ballot, which will not be counted unless he presents acceptable photo ID by Friday. He has a Minnesota driver's license, which he does not want to surrender in exchange for a Wisconsin ID, because he regularly commutes to a suburb of Minneapolis for work as a school teacher and he may wish to return to Minneapolis someday in the future. He also does not want to spend \$34 for a

Wisconsin driver's license just to vote. Voegelé will be disenfranchised simply because Wisconsin stubbornly refuses to issue eligible Wisconsin voters a free ID for voting unless they surrender their out-of-state driver's license, see Wis. Stat. § 343.50(1)(b); Wis. Admin. Code § Trans 102.14(2), even though driving has nothing to do with voting.

Dated this 8th day of November 2016,

Respectfully submitted,

/s/ Sean J. Young

KARYN L. ROTKER
State Bar No. 1007719
LAURENCE J. DUPUIS
State Bar No. 1029261
American Civil Liberties Union of Wisconsin
Foundation
207 East Buffalo Street, Suite 325
Milwaukee, WI 53202
(414) 272-4032
krotker@aclu-wi.org
ldupuis@aclu-wi.org

NEIL A. STEINER
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3822
neil.steiner@dechert.com

CRAIG G. FALLS
Dechert LLP
1900 K Street NW
Washington, DC 20006
(202) 261-3373
craig.falls@dechert.com

ANGELA M. LIU
Dechert LLP
35 West Wacker Drive, Suite 3400
Chicago, IL 60601
(312) 646-5816
angela.liu@dechert.com

SEAN J. YOUNG
DALE E. HO
SOPHIA LIN LAKIN
American Civil Liberties Union Foundation,
Inc.
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2693
syoun@aclu.org
dale.ho@aclu.org
slakin@aclu.org

LAUGHLIN MCDONALD
American Civil Liberties Union Foundation,
Inc.
230 Peachtree Street, Suite 1440
Atlanta, GA 30303
(404) 523-2721
lmcdonald@aclu.org

TRISTIA BAUMAN
National Law Center on Homelessness &
Poverty
2000 M Street NW, Suite 210
Washington, DC 20036
(202) 638-2535
tbauman@nlchp.org

