

**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. Voegele 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 10th day of November 2016,

Respectfully submitted,

/s/ Sean J. Young

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