

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

ONE WISCONSIN INSTITUTE, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

GERALD C. NICHOL, *et al.*,

Defendants.

DECLARATION OF MICHAEL HAAS

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

1. I am currently the Administrator of the Wisconsin Election Commission (WEC). I have been employed by WEC since June 29, 2016. From January 2013 to June 28, 2016, I was employed as Elections Division Administrator of the Government Accountability Board. In both positions, my responsibilities have included supervising the staff of the State's election agency to administer and enforce Wisconsin election laws. I have participated in the development and implementation of the public information campaign to inform the public about the Photo ID Law and the IDPP.

2. At the time the WEC created its outreach campaign with our media vendor KW2, we discussed efforts that we knew Milwaukee County would be undertaking.

3. Based on what WEC learned about Milwaukee's outreach efforts at that time, we concluded that to maximize our available dollars and eliminate potential overlap with their campaign, we would not target theatres in the City of Milwaukee for distributing WEC advertising, as we understood that the County would target pre-show advertising in the City as well as in Milwaukee County.

4. Our understanding of Milwaukee County's outreach plan indicated that the County would target pre-show advertising at theatres in the City of Milwaukee as well as Milwaukee County.

5. The WEC's understanding was also that Milwaukee County would use many of WEC's outreach materials in its campaign.

6. The WEC also tried to avoid overlap between WEC advertising and Milwaukee County advertising on bus stop ads in Milwaukee.

7. The WEC was aware that Milwaukee County would conduct its own outreach campaign to target bus stops, so the WEC concluded, upon consultation with KW2, that that would not be the most effective use of our outreach funds.

8. Based upon the advice of KW2, the WEC did, however, implement some “on bus” advertising in Milwaukee to support repetitive awareness by individuals using the public bus system.

9. Attached as Exhibit A is a true and correct copy of the outreach plan that WEC received from Milwaukee County on October 5, 2016. The plan indicates that the County will target pre-show advertising at four Marcus Cinemas, Oak Creek Value, Showtime, South Shore and Menomonee Falls. These ads used the same Screenvision vendor that our campaign uses across the state.

10. On October 6, 2016, Milwaukee County also informed the WEC that several large churches and health care facilities have agreed, at the County’s request to play a Photo ID video for their members and visitors to their facilities. The participating locations include Christ the King Church, Parklawn Assembly of God, Holy Redeemer, Christian Faith Fellowship Church, Northside Church of God, Greater New Birth Baptist Church, Columbia St. Mary’s and affiliated hospitals statewide, and Dental Associates Corporate Office. Milwaukee County has also requested that these organizations place Photo ID related messages on their social media outlets.

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

Dated this 6th day of October, 2016.

/s/Michael Haas
MICHAEL HAAS

Milwaukee County Election Commission 2016 General Election Bring it to the Ballot Campaign



Overview

Milwaukee County Election Commission is pleased to submit this recommendation for Bring It to the Ballot as a way to increase awareness of Voter ID law among Wisconsin residents of age to vote in the 2016 presidential election.

The Objective

- Increase awareness of Voter ID law among Wisconsin residents of age to vote in the 2016 presidential election
- Increase knowledge of valid forms of voter ID by driving users to the website www.bringit.wi.gov
- Increase overall turnout of qualified voters at the polls for the 2016 presidential election through an informed media presence

Target Audience

- Ages 18+ in Milwaukee County with a focus on populations less likely to be aware of the Voter ID law or have valid forms of ID:
 - Students
 - Low Socioeconomic Status
 - Minorities

Approved Tactics

- Public Displays
 - Transit Shelter Displays
- Out-of-home
 - Interior/Exterior Bus Advertising
- Radio
 - :30 Second Commercials for 3 weeks

- Print Media
 - Advertisement in local newspaper publications
- Cinema
 - Pre-show video ads across the state
- Text messaging
 - Bulk text message alerts

Campaign Timing

- Key time periods include:
 - General Election – 11/8/16

Buy Recommendation

- Public Displays
 - We are recommending the use of Clear Channel outdoor as a vendor for our Bring It to the Ballot bus shelter displays. The Milwaukee County Election Commission was able to secure advertisements for bus displays. These displays will be 4x6 and posted at 10 locations throughout Milwaukee County.

Wisconsin Av/James Lovell St
Capitol Dr/ Humboldt Av
6th St ES/Juneau Av
27th St/ Evergreen Ln
Oakland Av/Kenwood Av
Mitchell St/16th St
60th St/ Burleigh St
27th St/Barnard Av
Holton St/Townsend St
60th St/Appleton Ave

- Total Costs: \$2,500
- Out-of-home
 - We are recommending the use of Direct Media USA as a vendor for Milwaukee County Transit-Bring It to the Ballot bus advertisements. These will be posted on 10 Milwaukee County buses for approximately 4 weeks.
 - Total Costs: \$2,500

- Radio
 - We are recommending the usage of radio advertisement for the Bring It to the Ballot campaign for the Fall 2016 General Election. We are reaching out to five local radio stations (WKKV, WMIL, WRIT, WRNW-FM, WGLB and WNOV) for three total weeks of on-air advertising.
 - Total Costs: \$4,915

- Print Media
 - We are recommending the usage of the Milwaukee Times, Milwaukee Courier, Milwaukee Community Journal, and Spanish Journal as a vendor for the Bring It to the Ballot campaign.
 - Total Costs: \$4,000

- Cinema
 - We are recommending the usage of Screenvision as a vendor for the Bring It to the Ballot campaign. These publications of several :30 seconds commercial spots which offer pre-show video advertising. The following location were selected A 35 second infomercial will run at four (4) Marcus Cinemas, Oak Creek Value, Showtime, South Shore, and Menomonee Falls

 - - Total Costs: \$3,790

- Software
 - We are recommending the usage of GovDelivery as a software vendor for the delivery of SMS text messages for mass citizen engagement. These will be disbursed through a series of text alerts notifying the voter of upcoming election deadlines.
 - Total Costs: \$15,000
 - Text information.... **MKE VOTE 468311**

3 Media Buy Breakdown-11-8-16 (002)\fs01\timemattersattachments\9SPE\2015-03598\E-Filing\Filing for Friday, October 5\Haas Exhibits\Media Buy Breakdown-11-8-16 (002).docx

Media Buy Breakdown

<u>Tactic</u>	<u>Dates</u>	<u>Campaign Breakdown</u>	<u>Estimated Costs</u>
Public Displays	10/10/16 – 11/8/16	Transit Shelter 4x6 – 10 locations throughout Milwaukee County (4 weeks)	\$2,500.00
Out-of-home	10/10/16 – 11/8/16	10 Bus Kings (30x144") 400 Bus Interior Cards (11x28") – one per bus (4 weeks)	\$2,787.00 \$6,668.00
Radio		4 Radio Stations (WKKV, WMIL, WRIT, WRNW-FM, WNOV) for 3 weeks	\$5,615.00
Print Media		4 New Papers (Milwaukee Times, Milwaukee Courier, Milwaukee Community Journal, Spanish Journal)	\$4,000.00
Cinema		2 Week Campaign POD 1 - :30 second Commercial	\$3,790.00
Software		Software for Text Message	\$15,000.00
Total			\$ 40,360.00

4 **Media Buy Breakdown-11-8-16 (002)\fs01\timemattersattachments\9SPE\2015-03598\E-Filing\Filing for Friday, October 5\Haas Exhibits\Media Buy Breakdown-11-8-16 (002).docx**

Exhibit A