

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

---

ONE WISCONSIN INSTITUTE, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

MARK L. THOMSEN, *et al.*,

Defendants.

---

**DECLARATION OF STACEY KVAMMEN  
REGARDING REPORT OF DMV'S INVESTIGATIONS  
INTO IDPP COMPLIANCE**

---

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

1. I am a Customer Service Representative—Advanced at the Wisconsin Department of Transportation, Division of Motor Vehicles (DMV), Bureau of Field Services. I have been a Customer Service Representative (CSR) for two years and work at the Madison East Service Center.

2. As a CRS, my job duties include providing information and assistance regarding the requirements and procedures for driver licensing, vehicle registration, and identification. I do this by assisting in the completion of proper applications and forms; conducting, evaluating, and

explaining the results of written, vision, hearing and other examinations; determining an applicant's eligibility for and issuing ID cards, driving instruction and motor vehicle salesperson permits; and assessing eligibility for drivers licenses for regular operator, motorcycle, CDL, occupational, reinstatements, and school bus drivers. My position also includes issuing registrations, titles, and license plates, which requires an evaluation of vehicle type and operation and ownership status. As part of my job, I also have to assess and collect any required fees.

3. I am familiar with the newspaper stories concerning Zack Moore's trip to the DMV on Thursday, September 22. I have also listened to the audio tape that was made during Mr. Moore's DMV visit, and read a transcript that was prepared from that audio recording. This transcript is attached to the Declaration of Gabe Johnson-Karp as **Exhibit A**.

4. I was working at the Information Desk at the Madison East Service Center on Thursday, September 22, 2016. The Information Desk is the first contact for customers coming to this DMV field office. The CSR working at the Information Desks is responsible for making contact with the customer and assessing what service(s) the customer is looking to accomplish that day. The Information Desk then issues the customer a ticket to go to a specific counter that can provide those services.

5. I was working at the Information Desk with CSR Wendy Schoebel when Mr. Moore came into the service center on September 22, 2016.

6. I am "Employee 2" in the transcript, Exhibit A.

7. When I started interacting with Mr. Moore, he had not mentioned that he wanted an ID for voting. He stated that he wanted a Wisconsin ID, and I correctly started to assess whether he had the proper documents for getting a Wisconsin ID card. I determined that he had sufficient proof of his identity and Wisconsin residency, but did not have his birth certificate, which I understood to be with his sister in Illinois.

8. I then started to explain the petition process and correctly informed Mr. Moore that if he entered the petition process, he would not get anything today.

9. I also tried to explain to Mr. Moore that if he could obtain his birth certificate from his sister, we could issue him an ID photo receipt right away and he could leave the DMV with that photo receipt in hand.

10. It became very clear to me in my discussion with Mr. Moore that he wanted to have his sister mail his birth certificate to him.

11. Most identification documents issued by DMV require a birth certificate, including a driver license. When I informed Mr. Moore that it is a lot easier if he has a birth certificate, I meant that it was easier because he

could quickly obtain an ID photo receipt the day of his DMV visit, and his birth certificate would be in the system should he want a driver license or other identification product in the future. It is always my goal to try to get the customer the product he desires, and I thought I was informing Mr. Moore of the easiest and quickest way to reach that goal.

12. For these same reasons, I also inform people who were born in Dane County that they can go down to Register of Deeds in Madison and they will print our their birth certificate for free if it will be used to get an ID to vote. I believe I am providing them with good customer service because I am telling them the quickest way to get the product they desire, which could also save them time and expense should they want another type of identification product in the future.

13. Despite my belief that getting his birth certificate from his sister would yield him the quickest ID and allow him to obtain any future ID products he may want, I repeatedly reminded Mr. Moore that the choice was totally up to him if he wanted to proceed with the petition process.

14. My responses to Mr. Moore's inquiry about how long the petition process would take were based on my understanding of how long it would take to get the final product, which I believed was contingent on when his birth state responded to DMV's inquiry. I did not know how long that process

took. IDs and ID receipts for individuals in the petition process are not issued by CSRs like me.

15. The female that accompanied Mr. Moore kept interjecting questions about the petition process. My belief during this series of questions was that Mr. Moore had easy access to his birth certificate and was going to have his sister mail it to him. So to me, it did not make sense to also initiate the petition process. Why start the process of tracking down the birth certificate when Mr. Moore has already done that and can easily get that record? I also wanted Mr. Moore to have easy access to other identification documents should he choose that later on, without having to come in again with the birth certificate.

16. Before my interaction with Mr. Moore, I had at least three occurrences where someone started the petition process and then came back and wanted to get their instructional permits for driving. We had to turn these individuals away and instruct them that they had to obtain their birth certificates before they could receive their permits. So if an individual can easily obtain their birth certificate, I believe that is the best and easiest option for everyone.

17. When the female that accompanied Mr. Moore asked me if Mr. Moore would be able to vote, I responded that I didn't know, and it was "kind of up in the air right now." (See Exhibit A, 9:2-3.) When I made this

statement, I was thinking of an affidavit process that I had heard about that people might be able to use the day of the election, but I wasn't sure of any such process, so I directed Mr. Moore and the female to a supervisor for more information.

18. Before September 22, 2016, I assisted at least three customers enter the petition process. These individuals told me they did not have access to a birth certificate, so I assisted them with completing the necessary forms and followed the all the steps on the IDPP checklist. If Mr. Moore told me that he could not easily obtain his birth certificate, or if he told me that he wanted to proceed with the petition process at any time, I would have certainly started the petition process with him as well.

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

Dated this 5<sup>th</sup> day of October, 2016.

/s/Stacey Kvammen  
STACEY KVAMMEN