

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

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ONE WISCONSIN INSTITUTE, *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324

MARK L. THOMSEN, *et al.*,

Defendants.

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**DECLARATION OF WENDY SCHOEBEL  
REGARDING REPORT OF DMV'S INVESTIGATIONS  
INTO IDPP COMPLIANCE**

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

1. I am Customer Service Representative (CSR) at the Wisconsin Department of Transportation, Division of Motor Vehicles (DMV), Bureau of Field Services. I have held this position since August 8, 2016. I completed a five week training period at the Madison West Service Center on September 16, 2016. I have been at the Madison East Service Center since September 19, 2016.

2. My job duties as a CSR include providing information and assistance regarding the requirements and procedures for driver licensing,

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 applicant's eligibility for and issuing ID cards, driving instruction and motor vehicle salespersons permits; and assessing eligibility for driver licenses for regular operator, motorcycle, CDL, occupational, reinstatements, and school bus drivers. Because I am new to this position, I do not issue registrations, titles, and license plates yet.

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 Stacey Kvammen when Mr. Moore came into the service center on September 22, 2016.

6. I am "Employee 1" in the transcript, Exhibit A.

7. I was the first to greet Mr. Moore and ask him what we could do for him today. Mr. Moore stated that he wanted to get a Wisconsin ID. I looked at the documents that Mr. Moore had brought with him and noticed that he did not have a birth certificate or passport.

8. Mr. Moore then told me his birth certificate was in Illinois, so I informed him that he would need to obtain that birth certificate for us to issue a product. At that point, a female interjected and asked about the petition process. This was the first indication that Mr. Moore was looking for an ID for voting purposes. I then brought CSR Stacey Kvammen into the conversation to assist, since I was a new CSR and Stacey was more experienced with these types of requests.

9. I was present the entire time when Stacey and Mr. Moore were interacting.

10. As the discussion with Mr. Moore progressed, it became very clear to me that his sister had his birth certificate and he was going to have her mail it to him.

11. At one point, the female with Mr. Moore asked if you get an ID when you initiate the petition process. I responded no, as did Stacey. I understood this question to be whether you get an ID that day—at the DMV—when you start the petition process. A photo ID receipt is only issued that same day if the necessary documents are presented, including a birth certificate. Since Mr. Moore did not present with a birth certificate, I believe I gave the correct response.

12. At one point, the female with Mr. Moore asked, “so even if we start the petition process, then it takes eight weeks,” and I responded “Right.” (See Exhibit A, 8:18–22.) I did not mean to affirm her statement by that response—I meant to indicate that I was following her hypothetical, since it was never suggested by us that the petition process would take eight weeks. Since Mr. Moore was not leaving with an ID product, I also agreed that he could not vote. I was thinking that he could not vote when he left that day, since I am aware early voting already started in Madison.

13. I fielded another inquiry regarding the petition process sometime between September 19 and September 21, 2016. This instance was very similar to Mr. Moore’s. In that instance, the customer presented without a birth certificate, but stated that his sister had it and could mail it to him. The customer was with a woman who asked about the petition process. Because I was new, I asked my supervisor to assist. We went through the correct

process for entering this customer in the petition process—following the petition checklist—and had the customer fill out the two required forms. The woman he was with asked if he could get an ID that day, and we properly responded no, not today. The customer ultimately decided to have his sister send him his birth certificate instead of entering the petition process.

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

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

/s/Wendy Schoebel  
WENDY SCHOEBEL