

**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**

Ruthelle Frank, on behalf of herself and all others similarly situated, brings this supplemental complaint to allege the following:

1. Since the filing of the original and First Amended Complaint, Melvin Robertson, Leroy Switlick, and James Green, eligible Wisconsin voters who lack accepted photo ID, have been harmed by Wisconsin's voter ID law.
2. Melvin Robertson was disenfranchised in the February 2016 elections. Robertson is an 87-year-old lifelong resident of Wisconsin, and an eligible voter who has voted in Wisconsin elections for many years. He testified in this case in 2013. He has been unable to get a Wisconsin state identification card, despite trying with assistance from the service coordinator at his housing development, and Anita Johnson from Citizen Action. Mr. Robertson never had a copy of his birth certificate and when he went to get one in 2012, he was told it did not exist. He has a Social Security card and an old Milwaukee County photo ID card with the name Melvin Robertson. However, the State Vital Records office and Milwaukee County do not have a record of his birth under the name

Melvin Robertson. He was told to get a “delayed” birth certificate to address this problem, but he does not have any of the old records – such as a baptismal certificate, hospital records, or school records – that are needed to get such a delayed certificate.

Although Mr. Robertson’s birth father had the last name of Smith, his mother married his stepfather and for as long as he can remember, Melvin Robertson has used the last name Robertson. Because he did not have ID, he was unable to vote in the February 2016 elections.

3. Leroy Switlick was disenfranchised in the April 2016 elections. Switlick is a 67-year-old lifelong resident of Wisconsin, and an eligible voter who has voted in Wisconsin elections for many years. He has been legally blind since birth and has other disabilities as well. He does not drive and has no accepted photo ID. Although he has a birth certificate and proof of residence, he lost his social security card some time ago and does not have that card. When Mr. Switlick went to DMV to try to obtain photo ID, he was told by DMV staff that he needed “photo ID” to obtain his photo ID – something he did not have. As a consequence, he was not able to obtain a state-issued photo ID card. Although he voted a provisional ballot in the April 2016 Wisconsin election, he was not able to obtain photo ID and his ballot went uncounted.
4. James Green is a resident of Wisconsin who struggles with homelessness, and currently lacks a birth certificate as well as a Social Security card. He would like to vote in Wisconsin but faces significant barriers to obtaining ID.
5. Robertson, Switlick, and Green are proposed members of Plaintiffs’ proposed Class 1. They have common and typical situations as those of other class members, and both will fairly represent the interests of the class. They seek to join this case as Plaintiffs to serve

as additional representatives of Class 1.

Dated this 26th day of July 2016,

Respectfully submitted,

/s/ Sean J. Young

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