

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

RUTHELLE FRANK, *et al.*,

Plaintiffs,

v.

Case No. 11-cv-1128 (LA)

SCOTT WALKER, *et al.*,

Defendants.

DECLARATION OF SHIRLEY BROWN

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

1. My name is Shirley Brown. I am an African-American woman who was born in Lake Providence, East Carroll Parish, Louisiana on July 9, 1938. I have lived in Milwaukee for more than 50 years.
2. I am a registered voter; I have voted in Wisconsin in the past; and I am eligible to vote in Wisconsin. I want to vote in Wisconsin in 2012.
3. I have never had a Wisconsin driver's license or state ID card. I do not have a license or photo ID from any state, or a passport, tribal ID, military ID, or college or university ID.
4. I was born at home with a midwife. I have never had my birth certificate, and I don't believe that one exists for me.
5. In the 1980s, I tried to get a Louisiana birth certificate. I called down to the records office in Louisiana, and they told me there was no record of my birth in their

system. They said that it might be possible to find one by a hand search, but that would be expensive, and I didn't have the money to afford a hand search.

6. In 2006, years after I made the call to Louisiana about my birth certificate, I went to apply for the "red, white and blue" Medicare card, at the Social Security office. I did not have a birth certificate, and I told them about my birth certificate problems. The Social Security office helped me get a notarized letter from the school district in Louisiana I went to as a child, which had my name, date of birth, place of birth, and my parents' names. Social Security said that was enough to put me on Medicare, even though I did not have a birth certificate.

7. When I heard about the voter ID law, I went to the Wisconsin Department of Motor Vehicles office on Mill Rd. in Milwaukee, to try to get my ID. I took that notarized letter that Social Security had gotten for me. DMV told me that without a birth certificate I could not get the photo ID that I need to vote. I was not told of any alternative option by which I could get a letter from the Louisiana vital records office confirming that there is no record of my birth and use other documents to prove my U.S. citizenship. I went to DMV two times to try this -- once around the time the law started, and once in January 2012 -- and both times they said I could not get a state ID card without my birth certificate. Because I don't have a car, I had to take (and pay for) the senior transit bus to and from the DMV office, which at the time was \$3.00 each way.

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

Executed on 2-21-12, 2012.

Shirley Brown

Shirley Brown