

IN THE
Supreme Court of the United States

JILL SWENSON, *et al.*,

Petitioners,

v.

WISCONSIN STATE LEGISLATURE, *et al.*,

Respondents.

SYLVIA GEAR, *et al.*,

Petitioners,

v.

WISCONSIN STATE LEGISLATURE, *et al.*,

Respondents.

DEMOCRATIC NATIONAL COMMITTEE, *et al.*,

Petitioners,

v.

WISCONSIN STATE LEGISLATURE, *et al.*,

Respondents.

TO THE HONORABLE BRETT M. KAVANAUGH ASSOCIATE JUSTICE OF THE SUPREME
COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR THE SEVENTH CIRCUIT

**APPENDIX TO RESPONDENT'S OPPOSITION TO
EMERGENCY APPLICATION TO VACATE STAY
VOLUME I OF III**

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

CHRYSTAL EDWARDS, TERRON
EDWARDS, JOHN JACOBSON,
CATHERINE COOPER, KILEIGH
HANNAH, KRISTOPHER ROWE, KATIE
ROWE, CHARLES DENNERT, JEAN
ACKERMAN, WILLIAM LASKE, JAN
GRAVELINE, TODD GRAVELINE,
ANGELA WEST, DOUGLAS WEST, and all
others similarly situated,

Case No. 20-CV-340

Plaintiffs,

v.

ROBIN VOS, in his official capacity as
Speaker of the Wisconsin State Assembly;
SCOTT FITZGERALD, in his official
capacity as Majority Leader of the Wisconsin
State Senate; STATE OF WISCONSIN;
WISCONSIN STATE ASSEMBLY;
WISCONSIN STATE SENATE;
WISCONSIN ELECTIONS COMMISSION;
MARGE BOSTELMANN, JULIE M.
GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL, JR.,
and MARK L. THOMSEN, in their official
capacities as members of the Wisconsin
Elections Commission, and MEAGAN
WOLFE, in her official capacity as the
Administrator of the Wisconsin Elections
Commission,

Defendants.

**MEMORANDUM OF DEFENDANTS WISCONSIN ELECTIONS COMMISSION,
MARGE BOSTELMANN, JULIE M. GLANCEY, ANN S. JACOBS, DEAN KNUDSEN,
ROBERT F. SPINDELL, JR., MARK L. THOMSEN AND MEAGAN WOLFE
IN SUPPORT OF THEIR MOTION TO DISMISS THE
AMENDED COMPLAINT AGAINST THEM**

The above-named defendants, the Wisconsin Elections Commission (“WEC”), WEC Commissioners Bostelmann, Glancey, Jacobs, Knudsen, Spindell and Thomsen, and WEC Administrator Wolfe, the individuals being sued in their official capacity, have filed a motion to dismiss the amended complaint against them for lack of subject matter jurisdiction and failure to state a claim upon which relief may be granted, pursuant to Rules 12(b)(1) and 12(b)(6), Fed. R. Civ. Proc. For the following reasons, the WEC defendants respectfully request that their motion be granted.

I. BACKGROUND: ALLEGATIONS IN THE AMENDED COMPLAINT.

The plaintiffs filed their amended complaint on May 4, 2020, alleging two claims for relief. (Dkt. No. 5.) The first claim is brought pursuant to 42 U.S.C. § 1983 and alleges violations of the plaintiffs’ voting rights under the Constitution’s First and Fourteenth Amendments. (Id., ¶¶ 90-113.) The second claim asserts violations of Title II of the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12101 *et seq.*, in relation to voting procedures. (Id. ¶¶ 114-132.) In addition to the WEC defendants, the named defendants are: Robin Vos, in his official capacity as Speaker of the Wisconsin State Assembly; Scott Fitzgerald, in his official capacity as Majority Leader of the Wisconsin State Senate; the Wisconsin State Assembly; and the Wisconsin State Senate.

The amended complaint is a putative class action seeking damages as well as declaratory and injunctive relief. Specifically, the plaintiffs seek a judgment awarding monetary damages pursuant to the ADA for alleged injuries stemming from the decision to hold the Wisconsin Presidential Primary and Spring Election (“Spring Election”) on April 7, 2020. (Id., Prayer for Relief ¶ a.) They also seek a judgment requiring compliance with the ADA and the establishment of constitutionally sufficient voting procedures at upcoming 2020 elections. (Id. ¶ 1, Prayer for Relief ¶ c.)

The crux of the amended complaint concerns the Spring Election, and in particular the alleged conduct of the Legislative defendants. For example, the plaintiffs contend “that there is no compelling justification, let alone rational basis” for not having postponed the Spring Election in the midst of the COVID-19 pandemic. (Id. ¶ 5.) They allege that the refusal to postpone the Spring Election was for “clearly political reasons.” (Id. ¶ 7.) They allege that despite the Governor’s request that they do so, defendants Vos and Fitzgerald “refused to call the Assembly and Senate into session to consider an alternative approach to the Spring Election.” (Id. ¶ 58.) They allege that “the Legislative Defendants deprived thousands of Wisconsin citizens of their fundamental constitutional right to vote and their rights under the Americans with Disabilities Act...” (Id. ¶ 61.) They assert that “(t)his legislative **inaction** forms the heart of this case, because the failure of the State and the Legislative Defendants to postpone the Spring Election or otherwise establish balloting procedures to ensure that all qualified voters could vote directly caused the deprivation of the constitutional and statutory rights of the Plaintiffs and the class members they seek to represent, and threatens to cause those injuries to recur in the Future 2020 Elections.” (Id., ¶ 65)(emphasis original.)

The amended complaint lacks specific allegations as to what the WEC defendants could or should have done relative to the timing of the Spring Election. The amended complaint also acknowledges that the WEC defendants lack control over the injunctive remedies the plaintiffs and putative class members seek:

Given their exclusive authority under Wisconsin law as interpreted by the Wisconsin Supreme Court over controlling the mode, method, and timing of Wisconsin Elections, the Legislative Defendants should be ordered to establish procedures for the Future 2020 Elections that are reasonable, fair, and constitutionally sufficient given the pandemic.
(Id. ¶ 96.)

II. LEGAL STANDARDS APPLICABLE TO MOTION TO DISMISS.

The standard of review applicable to a motion to dismiss based on lack of subject matter jurisdiction was summarized as follows in *Ezekiel v. Michel*, 66 F.3d 894, 897 (7th Cir. 1995):

When ruling on a motion to dismiss for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1), the district court must accept as true all well-pleaded factual allegations, and draw reasonable inferences in favor of the plaintiff.” *Rueth v. United States Environmental Protection Agency*, 13 F.3d 227, 229 (7th Cir.1993). “The district court may properly look beyond the jurisdictional allegations of the complaint and view whatever evidence has been submitted on the issue to determine whether in fact subject matter jurisdiction exists.” *Capitol Leasing Co. v. Federal Deposit Insurance Corp.*, 999 F.2d 188, 191 (7th Cir.1993) (per curiam) (quoting *Grafon Corp. v. Hausermann*, 602 F.2d 781, 783 (7th Cir.1979)); see also *Rennie v. Garrett*, 896 F.2d 1057, 1057–58 (7th Cir.1990). We review de novo the district court's dismissal of an action under Rule 12(b)(1). *Bailor v. Salvation Army*, 51 F.3d 678, 684 (7th Cir.1995).

A motion to dismiss pursuant to Rule 12(b)(6) should be granted where, accepting all well pleaded allegations in the complaint as true and drawing all reasonable inferences in favor of the plaintiff, the plaintiff can prove no set of facts entitling him/her to relief. *Porter v. DiBlasio*, 93 F.3d 301, 305 (7th Cir. 1996).

III. THE COURT LACKS SUBJECT MATTER JURISDICTION IN REGARD TO THE INJUNCTIVE RELIEF SOUGHT.

A. There Must Be An Actual Controversy Between The Parties In Order For The Court To Have Subject Matter Jurisdiction.

Article III, § 2 of the Constitution extends the judicial power of federal courts only to “cases” and “controversies.” *Rock Energy Coop. v. Village of Rockton*, 614 F.3d 745, 748 (7th Cir. 2010). The Declaratory Judgment Act (“DCA”), one of the alleged bases of subject matter jurisdiction in this case (Dkt. No. 5, ¶ 10), may be invoked to resolve a “case of actual controversy” within a district court’s jurisdiction. 28 U.S.C. § 2201(a). In this regard, the requirements of the DCA and Article III are coextensive. *Aetna Life Ins. Co. v. Haworth*, 300 U.S. 227, 239-41, 57

S.Ct. 461 (1937); *Deveraux v. City of Chicago*, 14 F.3d 328, 330 (1994)(DCA tracks the cases and controversies requirement of Article III). Absent the existence of an actual, justiciable controversy between parties, a district court lacks subject matter jurisdiction. *Harris Trust & Savings Bank v. E-II Holdings, Inc.*, 926 F.2d 636, 640 (7th Cir. 1991).

A case presents an actual controversy when “there is a substantial controversy, between parties having adverse legal interests, of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.” *Oneida Tribe of Indians v. Wisconsin*, 951 F.2d 757, 760 (7th Cir. 1991) (internal quote omitted). The legal interests of the parties in the alleged dispute is a key factor in determining whether an actual controversy exists which satisfies Article III requirements, mirrored by the DCA. The litigants must have adverse legal interests. *Aetna*, 300 U.S. at 240-241; *Muskrat v. United States*, 219 U.S. 346, 361, 31 S.Ct. 250 (1911). An actual controversy does not exist where a defendant does not take a position regarding the outcome of the case. *Muskrat*, 219 U.S. at 361.

As discussed below, the authority of the WEC defendants is defined and constrained by Wisconsin statutes. They have no authority to modify election laws, or even to take a substantive position as to whether laws governing the conduct of elections ought to be changed. Accordingly, as between the plaintiffs and the WEC defendants, there is no actual controversy in regard to the injunctive relief sought.

B. The WEC Defendants Had No Authority To Alter The Spring Election And Have No Authority To Grant Or Oppose The Injunctive Relief Requested.

The plaintiffs contend that the decision to hold the Spring Election violated the constitutional and statutory rights of the plaintiffs and putative class members. They allege that similar violations will ensue with respect to upcoming 2020 elections unless compliance with the ADA is mandated. The conduct of the elections at issue is governed by state law. *See, generally*

Wis. Stats. Ch. 5. The WEC, its individual members and administrator, have no power or authority to vote on or enact legislation. The Commission is responsible for administering Wisconsin's elections laws, except campaign financing laws. Wis. Stats. § 5.05(1). The Commission is empowered to investigate election law violations, file lawsuits related to enforcement of election laws, issue orders and promulgate administrative rules implementing Wisconsin's election laws. *Id.* The Commission had no power to enact any changes to the election laws in regard to the Spring Election, and it has no authority to change the law relative to the conduct of future elections.

The inappropriateness of suing WEC officials is illustrated by the fact that the Commission itself is bound by and unable to challenge or litigate the outcome of the injunctive relief sought in this case. The Commission is a creature of the statutes creating it and granting its powers. The Commission does not have the statutory authority to appeal any judicially mandated changes in elections procedures. Wis. Stats. § 5.05(5t). When faced with a binding state or federal court decision relating to election law the Commission's authority is confined to implementing the decision, issuing updated guidance to local election officials and voters, making formal advisory opinions, commencing rule-making or requesting an opinion from the Attorney General on the "applicability of the court decision." *Id.* The Commission has no authority to appeal any such decision.

The amended complaint also named as defendants the WEC's individual commissioners and its administrator. No commissioner may act individually to carry out any Commission function. Any action by the Commission, except an action relating to its own internal procedures, requires a two-thirds vote of the Commission. Wis. Stats. § 5.05(1e). Likewise, the Commission's administrator, even as the chief elections officer in the state, is not statutorily empowered to modify laws concerning the conduct of elections. The WEC Defendants will be bound by any decision the

Court makes which impacts the election laws implicated in this case, and thereafter issue whatever guidance may be appropriate pursuant to Wis. Stats. § 5.05(5t).

The amended complaint does not specify how future elections ought to be conducted to better allow those with disabilities to vote in-person. The precise nature of the injunctive relief sought is not specified. Vague injunctions that do no more than require parties to “follow the law” are disfavored. *EEOC v. AutoZone, Inc.*, 707 F.3d 824, 841 (7th Cir.2013) (“An injunction that does no more than order a defeated litigant to obey the law raises several concerns.”). Presumably the plaintiffs envision relief entailing the modification of election laws and procedures, matters over which they acknowledge the WEC defendants have no control. Due to the statutory constraints on their authority, the WEC defendants take no position in this case as to whether the plaintiffs’ are entitled to some form of prospective relief. Since the WEC defendants do not have legal interests adverse to the plaintiffs in regard to the issuance of injunctive relief, no actual controversy exists between them on that issue.

IV. THE AMENDED COMPLAINT DOES NOT STATE A CLAIM FOR DAMAGES AGAINST THE WEC DEFENDANTS UNDER TITLE II OF THE AMERICANS WITH DISABILITIES ACT.

Title II of the ADA provides that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” 42 U.S.C. § 12132. Discrimination in violation of Title II can be shown by the failure to make “reasonable modifications in policies, practices, or procedures. 28 C.F.R. § 35.130(b)(7)(i). In order to prove discrimination in violation of Title II, “a plaintiff must show: (1) that he is a qualified individual with a disability; (2) that he was denied the benefits of the services, programs, or activities of a public entity or otherwise subjected to discrimination by such an entity; and (3)

that the denial or discrimination was by reason of his disability.” *Lacy v. Cook County, Illinois*, 897 F.3d 847, 853 (7th Cir. 2018)(internal citations and quotations omitted).

In order to obtain a judgment for damages for a violation of Title II, a plaintiff must demonstrate “the intentional nature of the defendants’ discrimination.” *Lacy*, 897 F.3d at 856, citing *Bd. of Educ. of Twp. High Sch. Dist. No. 211 v. Ross*, 486 F.3d 267, 278 (7th Cir. 2007). Intentional discrimination may be established by showing deliberate indifference. *Lacy*, 897 F.3d at 863. Proof of deliberate indifference requires evidence showing both 1) that the defendants knew that harm to a federally protected right was substantially likely; and 2) the defendants failed to act to prevent such harm. *Id.*

The basis of the claim for damages against the WEC defendants is that they “insist(ed) on allowing the Spring Election to proceed without consideration of that decision’s impact on individuals with disabilities” (Dkt. No. 5, ¶ 120), and without affording the plaintiffs and putative class members reasonable accommodations to allow in-person voting. (*Id.*, ¶¶ 121-131.) As discussed above, the WEC defendants had no control over the timing of the Spring Election. The amended complaint acknowledges that the Legislative defendants have “exclusive authority...over controlling the mode, method, and timing of Wisconsin Elections...” (*Id.*, ¶ 96.) Since the WEC defendants had no power to change the timing or mode of the Spring Election, they cannot have failed to act to protect the plaintiffs’ rights. Thus they could not have been deliberately indifferent with respect to the timing of that election.

The amended complaint does not specify what accommodations the plaintiffs sought or what the WEC defendants could have done to facilitate the plaintiffs’ ability to vote in-person. Again, as discussed above, the WEC defendants have only those powers as expressed by statute. Conclusory allegations of discrimination by the WEC defendants, such as appear in the amended

complaint, are not sufficient to overcome a motion to dismiss. *Ashcroft v. Iqbal*, 556 U.S. 662, 681 (2009)(conclusory allegations “not entitled to be assumed true”). The claim for damages against the WEC defendants for alleged violations of the ADA should be dismissed.

V. THE PLAINTIFFS’ CLAIM FOR MONEY DAMAGES UNDER 42 U.S.C § 1983 IS BARRED BY SOVEREIGN IMMUNITY.

The WEC defendants adopt, and incorporate by reference, Section IV of the Legislative Defendants’ Memorandum In Support Of Their Motion To Dismiss The Amended Complaint, Dkt No. 13.

VI. CONCLUSION.

For the foregoing reasons, the WEC defendants respectfully request that the Court grant their motion to dismiss them as defendants in this case.

Respectfully submitted this 25th day of May, 2020

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and WEC Administrator Wolfe

EXHIBIT 2

VOTER REGISTRATION

Information provided by the Wisconsin Elections Commission

WHEN CAN I REGISTER TO VOTE?

By mail. Up to 20 days before the election. Registration forms should be mailed to your municipal clerk. You can start your voter registration form online at <http://myvote.wi.gov>. Your form must be printed, signed, and mailed or delivered, to your municipal clerk. You must always provide a Proof of Residence document when registering. If you are registering by mail, you can use any of the forms of Proof of Residence except a residential lease.

Online. Up to 20 days before the election. Voters who have a valid State of Wisconsin Driver License or State of Wisconsin ID card issued by the Wisconsin Division of Motor Vehicles (DMV) can register to vote online on the **MyVote Wisconsin** website: <http://myvote.wi.gov>. To register online, the voter must enter a name, date of birth, Driver License or ID number, and an address that matches what is on file with the Wisconsin DMV. If all of the fields match, the voter will be able to register to vote completely online without needing to print, sign or mail the form and without needing to send a proof of residence document. Voters who are not able to match their information with the information in the DMV database will be given the option to register by mail (see instructions above).

In the municipal clerk's office. You may register in-person in your municipal clerk's office up until the Friday before the election at 5:00 p.m. or close of business, whichever is later. You must always provide a Proof of Residence document when registering to vote.

At the polling place on Election Day. You may register at the polls on Election Day. You must always provide a Proof of Residence document when registering to vote.

WHAT DO I NEED TO BRING TO REGISTER TO VOTE?

If you have been issued a State of Wisconsin Driver License or ID card that is current and valid, you must provide the number and expiration date. If your WI driver license is cancelled or expired; or your WI DOT-issued ID is expired, provide the number and the last four digits of your Social Security number. If you have not been issued a WI driver license or WI DOT-issued ID, you must provide the last four digits of your Social Security number. If you have none of these documents, you will be able to indicate that fact.

You must provide a Proof of Residence document when registering to vote in Wisconsin. A Proof of Residence document is a document that proves where you live in Wisconsin. Please see the Proof of Residence handout for a list of acceptable documents.

IS THERE ANYTHING ELSE I NEED TO KNOW ABOUT REGISTRATION?

Photo ID is never required when registering to vote. However, a Proof of Residence document is always needed when registering to vote in Wisconsin.

Voters must reside at their address for at least 10 days by Election Day in order to register to vote. Voters who have moved within Wisconsin less than 10 days before the election must vote from their previous address, either by absentee ballot or at the polling place. Voters who have moved to Wisconsin from another state less than 10 days before an election are only eligible to vote in Presidential elections.

Wisconsin law no longer allows a "corroborating witness" to provide Proof of Residence. See the "Proof of Residence" documents for a list of Proof of Residence documents.

You cannot register the Saturday, Sunday, or Monday before an election, but **you can register at the polling place on Election Day.**

Find more information on the Photo ID law at www.BringIt.wi.gov

Register to vote or check your registration status at: www.MyVote.wi.gov

Contact the Wisconsin Elections Commission at 1-866-Vote-Wis or at elections@wi.gov

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

DEMOCRATIC NATIONAL
COMMITTEE and DEMOCRATIC
PARTY OF WISCONSIN,

Plaintiffs,

v.

Case No. 20-CV-00249

MARGE BOSTELMANN, JULIE M.
GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL,
JR., and MARK L. THOMSEN, in their
official capacities as Wisconsin Elections
Commissioners,

Defendants.

NOTICE OF WITHDRAWAL OF ATTORNEY

Notice is hereby given that Assistant Attorney General Brian P. Keenan withdraws as counsel for Defendants Marge Bostelmann, Julie M. Glancy, Ann S. Jacobs, Dean Knudson, Robert F. Spindell Jr. and Mark L. Thomsen in the above-captioned case due to the substitution of Lawton & Cates, S.C. as counsel for the defendants (Dkt. 48).

[signature page follows]

Dated this 26th day of March 2020.

Respectfully submitted,

ERIC J. WILSON
Deputy Attorney General of Wisconsin

Electronically signed by:

s/ Brian P. Keenan
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Assistant Attorney General
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DEMOCRATIC NATIONAL
COMMITTEE and DEMOCRATIC
PARTY OF WISCONSIN,

Plaintiffs,

v.

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GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL,
JR., and MARK L. THOMSEN, in their
official capacities as Wisconsin Elections
Commissioners,

Defendants.

NOTICE OF WITHDRAWAL OF ATTORNEY

Notice is hereby given that Assistant Attorney General Jody J. Schmelzer withdraws as counsel for Defendants Marge Bostelmann, Julie M. Glancy, Ann S. Jacobs, Dean Knudson, Robert F. Spindell Jr. and Mark L. Thomsen in the above-captioned case due to the substitution of Lawton & Cates, S.C. as counsel for the defendants (Dkt. 48).

[signature page follows]

Dated this 26th day of March 2020.

Respectfully submitted,

ERIC J. WILSON
Deputy Attorney General of Wisconsin

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

DEMOCRATIC NATIONAL
COMMITTEE and DEMOCRATIC
PARTY OF WISCONSIN,

Plaintiffs,

v.

Case No. 20-CV-00249

MARGE BOSTELMANN, JULIE M.
GLANCEY, ANN S. JACOBS, DEAN
KNUDSON, ROBERT F. SPINDELL,
JR., and MARK L. THOMSEN, in their
official capacities as Wisconsin Elections
Commissioners,

Defendants.

NOTICE OF WITHDRAWAL OF ATTORNEY

Notice is hereby given that Assistant Attorney General S. Michael Murphy withdraws as counsel for Defendants Marge Bostelmann, Julie M. Glancy, Ann S. Jacobs, Dean Knudson, Robert F. Spindell Jr. and Mark L. Thomsen in the above-captioned case due to the substitution of Lawton & Cates, S.C. as counsel for the defendants (Dkt. 48).

[signature page follows]

Dated this 26th day of March 2020.

Respectfully submitted,

ERIC J. WILSON
Deputy Attorney General of Wisconsin

Electronically signed by:

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EXHIBIT 15

The Washington Post

Coronavirus outbreak
Monkey Cage Analysis

The Wisconsin primary had extraordinarily high voter turnout

We analyzed this two ways. The result was the same: Unexpectedly high rates of voting, despite the chaos.

By Richard H. Pildes and
Charles Stewart III
April 15

With the votes now counted in Wisconsin's April 7 election, preliminary results show that [1.55 million people](#) voted. That's partly due to a staggering number of absentee votes — nearly 1.1 million — which made up for much of the in-person voting that [did not take place](#).

But what exactly should we make of the overall turnout figure? Most people expected it to be much lower than usual. Did the extraordinary conditions — [fear of the virus](#); widespread [last-minute polling place closures](#); an [overburdened mail-in balloting system](#); and controversy over [whether it would even be held](#) — nevertheless affect the number of ballots that would have been cast in a normal year?

Answering that question is harder than it might seem. We explain our analysis below.

How do you know what a primary's turnout would be under 'normal' circumstances?

As it turns out, overall turnout in Wisconsin's 2020 primaries was even higher than in most Wisconsin primaries in the past 40 years. Thirty-four percent of the state's potential voters cast a ballot last week — a slightly higher rate than the 31 percent average for all of Wisconsin's presidential primaries since 1984.

But is 31 percent the baseline against which we should assess whether turnout was high or low? That's not straightforward. The factors that affect voters' participation rates in primaries can change dramatically from one election cycle to the next. [Political science research finds](#)

that the closeness of the race between a party's potential nominees is perhaps the most important influence. Idiosyncratic factors also matter, such as whether other hotly contested races are also on the ballot.

To get an appropriate measure of what Wisconsin's 2020 turnout would have been under more normal circumstances, we used two methods that gave us remarkably similar answers.

Statistical estimation suggests this turnout was surprisingly high

First, we used statistical estimation to compare 19 Wisconsin primaries, held from 1948 to 2020. With so many, the model had to be simple. We considered the comparative competitiveness of the two parties' presidential primaries — and whether the incumbent president was running again or at the end of his two terms. We also took into account how Wisconsin primaries' turnout dropped dramatically beginning in 1984, when the rise of "Super Tuesday" made Wisconsin's primary votes less influential.

Using this approach, we found that in a "normal" 2020 election, roughly 26 percent of the voting-age population would have cast ballots, for about 1.2 million voters. That is far fewer than the 1.55 million votes actually cast. This 26 percent figure is lower than the post-1984 average, for two reasons. First, on the Republican side, an incumbent president was running for reelection, more or less uncontested. Second, the Democratic race was far less contested than in past years. Indeed, the Democratic race was the least competitive for the non-incumbent party since 1964, as measured by what political scientists call "[the effective number of candidates](#)," combined across the two parties.

More qualitative analysis also suggests surprisingly high turnout

We also examined this by looking at just the most recent presidential primaries that most resembled this one, making appropriate adjustments for obvious differences.

The 2012 Wisconsin primary most directly resembles this year's in key ways. With President Barack Obama up for reelection in 2012, the Democratic primary was uncontested, like the Republicans' this year. In 2012, [1,088,000 Wisconsinites voted](#): 788,000 in the Republican primary and 300,000 in the Democratic. In other words, 26 percent of the voting-age population cast ballots.

But that doesn't quite capture the difference. We would expect a lower 2020 turnout than in 2012, because this year's Democratic primary was fairly settled, while 2012's Republican contest was still hotly contested: Mitt Romney won 44 percent of the vote, followed by Rick Santorum's 37 percent and Ron Paul's 11 percent.

But 2020 turnout was actually eight points higher than that in 2012.

Still, there's another factor to take into account. In 2020, some states' Republican voters have been turning out in higher-than-usual numbers for a noncompetitive primary. For instance, turnout in the Michigan Republican primary was only 10 percent lower than it had been in 2016, while North Carolina's was down 33 percent. If we average the experience in Michigan and North Carolina, and "expect" that Republican turnout in Wisconsin would have dropped only 22 percent from 2016, that would predict this year's turnout to have been about 1.4 million. But despite chaotic conditions, more Wisconsin citizens than that voted.

One caution about these findings

One thing makes us uneasy about these estimates. In 2016, Wisconsin's primary turnout was a complete outlier. Fully 47 percent of the state's voting-age population cast ballots — 16 points more than the average since 1984.

Why, and what should that suggest to us? It's hard to be certain, since that was just one election. But both 2016 presidential primaries were strongly contested. This year, even though neither primary was as competitive as in 2016, turnout was only 13 points lower. On the Republican side, turnout was down 43 percent — unsurprising with an unopposed president on the ballot. In contrast, Democratic voting was down by only 7.6 percent. That's extraordinary, given that the primary between former vice president [Joe Biden](#) and Sen. Bernie Sanders (I-Vt.) [was not close](#).

There's another possible reason for 2016's exceptionally high primary turnout: a fiercely fought race for a [Wisconsin Supreme Court justice](#), which would determine the balance on the court. But that's unlikely; our statistical analysis finds that this would have been the first time since World War II that a judicial race dramatically affected primary turnout in Wisconsin. This year's election did feature another hotly contested state Supreme Court seat, though not one that would control the court's balance of power. And roughly 340,000 more votes were cast for the court race this year than a similar one in 2019, which further suggests that the presidential races, not the court ones, drive turnout.

Wisconsin's turnout was remarkably high, especially given the chaos

Wisconsin's primary turnout was up eight points from 2012 and down 13 points from the (possibly exceptional) 2016 race. Given the circumstances, that's remarkable. A week ago, informed commentators were wondering whether the chaos would drive turnout down to historic lows. The opposite happened. Why?

The most likely answer is that Democrats are so mobilized in the Trump era — either for Democrats or against Trump — that they are showing up in unexpectedly high numbers, even under Wisconsin's difficult pandemic circumstances. The 2018 midterm election in Wisconsin had the [highest turnout](#) that state has seen since World War II. And the 2019 supreme court spring election had the [second-highest turnout](#) among comparable elections over the past two decades, behind only 2011, when ideological control of the court was at stake.

In addition, allegations that the Republican legislature was trying to hold down turnout by not postponing the election might have further motivated Democrats to vote.

Still, beneath the aggregate numbers, we find some things to be concerned about. Turnout in Milwaukee County dropped much more than in most of the state, as it did in Brown County, home to Green Bay; [both had difficulties keeping polling places open](#). Further, some voters who tried to vote absentee could not, given administrative [problems](#) with the overburdened absentee ballot process. The surprisingly high turnout, despite all of this, is a sign that we should not underestimate the commitment of those who voted — or of the poll workers who served them.

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EXHIBIT 16

WEC Canvass Reporting System

Canvass Results for 2020 Spring Election and Presidential Preference Vote - 4/7/2020 5:00:00 AM

Office	Number of Votes Received	Percent of Total Votes	Candidate	Party
	PRESIDENT OF THE UNITED STATES			Total Votes: 1,555,263
	5,565	.6%	Tulsi Gabbard PO BOX 75255 Kapolei HI 96707	Democrat
	6,079	.66%	Amy Klobuchar PO BOX 18360 Minneapolis MN 55418	Democrat
	529	.06%	John Delaney PO BOX 70835 Bethesda MD 20813	Democrat
	311	.03%	Deval Patrick 25 Dorchester Ave PO BOX 52643 Boston MA 02205	Democrat
	293,441	31.72%	Bernie Sanders PO BOX 391 Burlington VT 05408	Democrat
	3,349	.36%	Andrew Yang 393 W 49th St. Apt 5EE New York NY 10036	Democrat
	4,946	.53%	Pete Buttigieg PO BOX 1226 South Bend IN 46624	Democrat
	836	.09%	Tom Steyer PO BOX 626 San Francisco CA 94104	Democrat
	14,060	1.52%	Elizabeth Warren 124 Washington St Suite 101 Foxboro MA 02035	Democrat
	475	.05%	Michael Bennet PO BOX 44494 Denver CO 80202	Democrat
	8,846	.96%	Michael R. Bloomberg PO BOX 1060 New York NY 10150	Democrat
Winner	581,463	62.86%	Joe Biden 1120 20th St NW Suite 250 Washington DC 20036	Democrat
	3,590	.39%	Uninstructed Delegate	Democrat

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	PRESIDENT OF THE UNITED STATES			Total Votes: 1,555,263
	1,575	.17%	SCATTERING	
Winner	616,782	97.87%	Donald J. Trump 725 Fifth Avenue New York NY 10022	Republican
	11,246	1.78%	Uninstructed Delegate	Republican
	246	.04%	Adam Nicholas Paul (write-in)	Republican
	1,924	.31%	SCATTERING	
Office	JUSTICE OF THE SUPREME COURT			Total Votes: 1,549,697
Winner	855,573	55.21%	Jill J. Karofsky	Non-Partisan
	693,134	44.73%	Daniel Kelly W340 S5527 Prairie View Drive North Prairie WI 53153	Non-Partisan
	990	.06%	SCATTERING	
Office	COURT OF APPEALS JUDGE DISTRICT 1			Total Votes: 129,998
Winner	128,621	98.94%	Joe Donald	Non-Partisan
	1,377	1.06%	SCATTERING	
Office	COURT OF APPEALS JUDGE DISTRICT 2			Total Votes: 429,286
Winner	231,788	53.99%	Lisa Neubauer	Non-Partisan
	196,958	45.88%	Paul Bugenhagen Jr	Non-Partisan
	540	.13%	SCATTERING	

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	COURT OF APPEALS JUDGE DISTRICT 4			Total Votes: 343,282
Winner	341,286	99.42%	Rachel A. Graham	Non-Partisan
	1,996	.58%	SCATTERING	
Office	BARRON COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 9,002
Winner	8,981	99.77%	J. Michael Bitney	Non-Partisan
	21	.23%	SCATTERING	
Office	BARRON COUNTY CIRCUIT COURT JUDGE BRANCH 3			Total Votes: 8,981
Winner	8,962	99.79%	Maureen D. Boyle	Non-Partisan
	19	.21%	SCATTERING	
Office	BROWN COUNTY CIRCUIT COURT JUDGE BRANCH 8			Total Votes: 52,199
	23,079	44.21%	Andy Williams	Non-Partisan
Winner	29,035	55.62%	Beau G. Liegeois	Non-Partisan
	85	.16%	SCATTERING	
Office	CHIPPEWA COUNTY CIRCUIT COURT JUDGE BRANCH 3			Total Votes: 15,626
Winner	8,839	56.57%	Benjamin Lane	Non-Partisan
	6,774	43.35%	Sharon Gibbs McIlquham	Non-Partisan
	13	.08%	SCATTERING	

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	DANE COUNTY CIRCUIT COURT JUDGE BRANCH 7			Total Votes: 129,141
Winner	127,673	98.86%	William E. Hanrahan	Non-Partisan
	1,468	1.14%	SCATTERING	
Office	DODGE COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 16,773
Winner	16,773	100%	Brian A. Pfitzinger	Non-Partisan
	0	0%	SCATTERING	
Office	DODGE COUNTY CIRCUIT COURT JUDGE BRANCH 4			Total Votes: 20,368
	10,017	49.18%	James T. Sempf	Non-Partisan
Winner	10,351	50.82%	Kristine A. Snow 505 S West St Waupun WI 53963	Non-Partisan
	0	0%	SCATTERING	
Office	DUNN COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 8,283
Winner	8,283	100%	James M. Peterson	Non-Partisan
	0	0%	SCATTERING	
Office	EAU CLAIRE COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 20,411
Winner	20,246	99.19%	Michael Schumacher	Non-Partisan
	165	.81%	SCATTERING	
Office	FLORENCE AND FOREST COUNTIES CIRCUIT COURT JUDGE			Total Votes: 3,962
Winner	2,189	55.25%	Leon D. Stenz	Non-Partisan

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	FLORENCE AND FOREST COUNTIES CIRCUIT COURT JUDGE			Total Votes: 3,962
	1,770	44.67%	Robert A. Kennedy, Jr.	Non-Partisan
	3	.08%	SCATTERING	
Office	FOND DU LAC COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 20,178
Winner	20,170	99.96%	Dale L. English	Non-Partisan
	8	.04%	SCATTERING	
Office	IRON COUNTY CIRCUIT COURT JUDGE			Total Votes: 1,946
Winner	1,927	99.02%	Anthony J. Stella, Jr. 13545N County Highway D Hurley WI 53534	Non-Partisan
	19	.98%	SCATTERING	
Office	JUNEAU COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 5,344
Winner	5,282	98.84%	Paul S. Curran	Non-Partisan
	62	1.16%	SCATTERING	
Office	KENOSHA COUNTY CIRCUIT COURT JUDGE BRANCH 3			Total Votes: 26,406
Winner	26,063	98.7%	Bruce E. Schroeder	Non-Partisan
	343	1.3%	SCATTERING	
Office	MARATHON COUNTY CIRCUIT COURT JUDGE BRANCH 3			Total Votes: 26,638
Winner	26,455	99.31%	LaMont K. Jacobson	Non-Partisan
	183	.69%	SCATTERING	

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	MARINETTE COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 10,520
	5,123	48.7%	Mike Perry	Non-Partisan
Winner	5,397	51.3%	Jane Kopish Sequin	Non-Partisan
	0	0%	SCATTERING	
Office	MENOMINEE AND SHAWANO COUNTIES CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 7,725
Winner	7,420	96.05%	Tony A. Kordus	Non-Partisan
	98	1.27%	Elisabeth Stockbridge (write-in) 1154 Elmore Street Green Bay WI 54303	Non-Partisan
	207	2.68%	Jeffrey Haase (write-in)	Non-Partisan
	0	0%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 128,744
Winner	127,585	99.1%	Milton L. Childs, Sr.	Non-Partisan
	1,159	.9%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 5			Total Votes: 170,021
Winner	99,091	58.28%	Brett Blomme	Non-Partisan
	70,005	41.17%	Paul Dedinsky	Non-Partisan
	925	.54%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 7			Total Votes: 124,873
Winner	123,474	98.88%	Thomas J. McAdams	Non-Partisan

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 7			Total Votes: 124,873
	1,399	1.12%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 16			Total Votes: 127,169
Winner	126,151	99.2%	Brittany Grayson	Non-Partisan
	1,018	.8%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 24			Total Votes: 126,360
Winner	125,239	99.11%	Janet C. Protasiewicz	Non-Partisan
	1,121	.89%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 27			Total Votes: 124,433
Winner	123,248	99.05%	Kevin E. Martens	Non-Partisan
	1,185	.95%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 29			Total Votes: 173,942
Winner	122,798	70.6%	Rebecca Kiefer	Non-Partisan
	50,602	29.09%	Dan Gabler 9267 N Lake Drive Bayside WI 53217	Non-Partisan
	542	.31%	SCATTERING	
Office	MILWAUKEE COUNTY CIRCUIT COURT JUDGE BRANCH 32			Total Votes: 127,306
Winner	126,227	99.15%	Laura Gramling Perez	Non-Partisan
	1,079	.85%	SCATTERING	

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	ONEIDA COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 9,259
Winner	9,210	99.47%	Patrick F. O'Melia 5192 Kerry Lane Rhineland WI 54501	Non-Partisan
	49	.53%	SCATTERING	
Office	OUTAGAMIE COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 35,172
Winner	35,172	100%	Emily I. Lonergan	Non-Partisan
	0	0%	SCATTERING	
Office	OUTAGAMIE COUNTY CIRCUIT COURT JUDGE BRANCH 3			Total Votes: 35,126
Winner	35,126	100%	Mitchell J. Metropulos	Non-Partisan
	0	0%	SCATTERING	
Office	SAINT CROIX COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 15,427
Winner	15,250	98.85%	Scott J. Nordstrand	Non-Partisan
	177	1.15%	SCATTERING	
Office	WASHBURN COUNTY CIRCUIT COURT JUDGE			Total Votes: 4,050
Winner	4,034	99.6%	Angeline E. Winton	Non-Partisan
	16	.4%	SCATTERING	
Office	WASHINGTON COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 31,757
Winner	31,757	100%	James K. Muehlbauer	Non-Partisan
	0	0%	SCATTERING	

	Number of Votes Received	Percent of Total Votes	Candidate	Party
Office	WAUKESHA COUNTY CIRCUIT COURT JUDGE BRANCH 5			Total Votes: 121,122
Winner	67,792	55.97%	Jack Melvin	Non-Partisan
	53,059	43.81%	Sarah A. Ponath	Non-Partisan
	271	.22%	SCATTERING	
Office	WAUPACA COUNTY CIRCUIT COURT JUDGE BRANCH 2			Total Votes: 10,704
Winner	10,664	99.63%	Vicki L. Clussman	Non-Partisan
	40	.37%	SCATTERING	
Office	WOOD COUNTY CIRCUIT COURT JUDGE BRANCH 1			Total Votes: 16,356
Winner	16,270	99.47%	Gregory J. Potter	Non-Partisan
	86	.53%	SCATTERING	

EXHIBIT 17



WISCONSIN ELECTIONS COMMISSION

Administering Wisconsin's Election Laws

[Home](#) » [Node](#)

Unofficial Spring Election Turnout - 34.3% - 4/14/2020

[Election Day](#)

According to unofficial results [reported by the Associated Press](#), there were 1,551,711 votes cast in the Democratic and Republican Presidential Preference contests. At this point, that is our best estimate of the number of voters who participated in the election. Statistical reports from municipal clerks won't be available for about a month.

(The total votes cast for Wisconsin Supreme Court justice was slightly lower - 1,548,504.)

To calculate turnout, we divide the number of voters by Wisconsin's [estimated voting-age population](#) of 4,524,066, which is 34.3%.

(Remember, the state's method of reporting turnout may differ from some municipal and county clerks, who divide total voters by the number of registered voters. They do this because voting-age population numbers are not available at the ward level. However, the number of registered voters is constantly changing because of election day registration, making the true number hard to pin down.)

How does that compare to previous Spring Elections with Presidential Preference Primary votes (and recent *Spring Elections without a presidential primary*)?

Spring Election	Ballots Cast	Turnout
2008	1,511,639	34.9%
2012	1,144,351	26.1%
2016	2,113,544	47.4%
2017	708,711	15.9%
2018	997,485	22.3%
2019	1,224,303	27.2%

2020	1,551,711	34.3%
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Wisconsin Elections Commission | 212 East Washington Avenue, Third Floor P.O. Box 7984 |
Madison, Wisconsin 53707-7984

tele (608) 266-8005 | *fax* (608) 267-0500 | *tty* 1-800-947-3529 | *e-mail* elections@wi.gov

Toll-Free Voter Help Line: 1-866-VOTE-WIS



April 7, 2020 Absentee Voting Report

May 15, 2020

Wisconsin Elections Commissioners

Dean Knudson, chair | Marge Bostelmann | Julie M. Glancey | Ann S. Jacobs | Robert Spindell | Mark L. Thomsen

Administrator
Meghan Wolfe

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I. Executive Summary

Absentee voting in the April 2020 election reached unprecedented levels but Wisconsin voters, local election officials and election administration systems largely adapted to the demand and managed the volume successfully. At a macro level, the processes to request, receive, return, and review absentee ballots proceeded normally and without inconsistencies. At a local level, the extraordinary volume placed enormous stress on election officials, elections systems, and the United States Postal Service (“USPS”).

Absentee voting remains a largely manual, labor-intensive process administered by each individual jurisdiction across the state. While voters can request a ballot and upload a photo ID on their smart phone in just a few minutes, behind the scenes clerks must still manually verify the IDs, stuff and seal envelopes by hand, apply postage, carry boxes of envelopes to the post office, and physically check off each request. These manual processes have worked well in the past, but they are not easy to scale up without advance warning or extensive preparation. When mail volume is up to ten times higher than anticipated, clerks must complete the same tasks without the benefit of having more staff, additional supplies or more hours to meet statutory deadlines.

Despite these challenges, clerks across the state did what was necessary to complete the task. Many jurisdictions hired and trained temporary staff, developed new procedures, and worked long nights and weekends to meet voter needs. The Wisconsin Elections Commission (“WEC” or “Commission”) likewise hired temporary staff, rapidly expanded technical systems, and worked around the clock to keep up with demand. The data in this report affirms that these efforts were successful, while still revealing opportunities for improvement and important lessons learned.

WEC staff, Wisconsin clerks, and the USPS are working together to make improvements to the absentee voting process and prepare for continued high vote-by-mail volume for the remainder of 2020 and beyond. Process improvements in development will revise the absentee ballot request application, ballot mailing, ballot tracking, and overall quality control. Every step in the process, from the application form, to the envelope, to the tracking tools, is under examination and being evaluated for potential improvements. The tools now in development will provide voters, clerks, and WEC staff with a simpler process and improved communication.

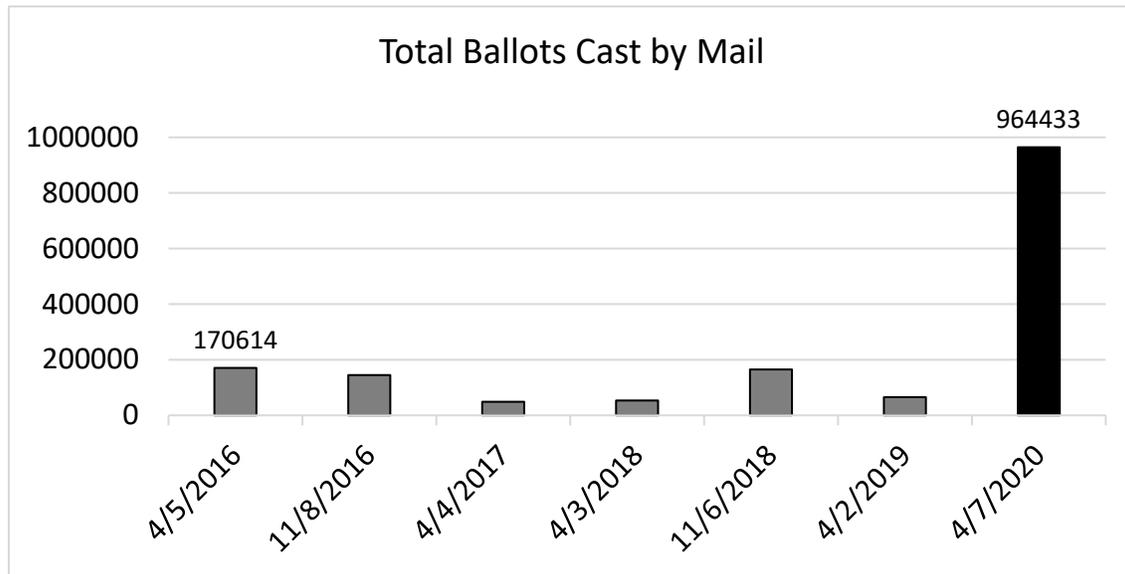
II. Facts: Absentee Voting Data

The April 2020 election broke absentee voting records in Wisconsin while maintaining relatively high turnout for a spring election. Indeed, the April 2020 election produced several state records, including:

- Most by mail ballots ever cast in any Wisconsin election
- Most absentee ballots ever cast in any Wisconsin election
- Second most total ballots ever cast in a Wisconsin Spring Election
- Most in-person absentee ballots in a Wisconsin Spring Election.

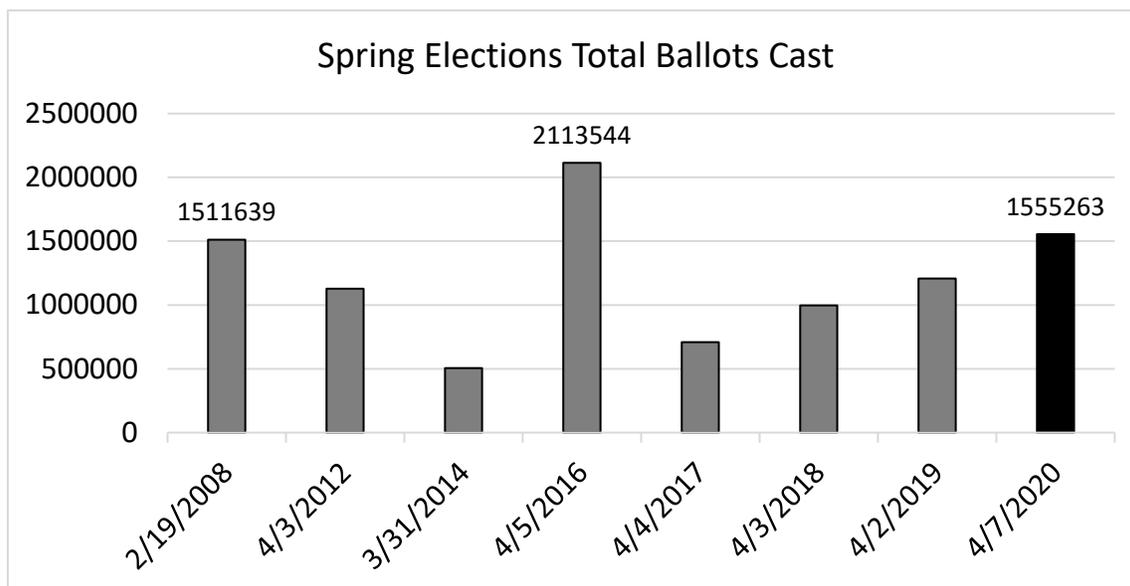
The total number of absentee ballots cast by mail easily surpassed the previous record set in April 2016.

Table 1.



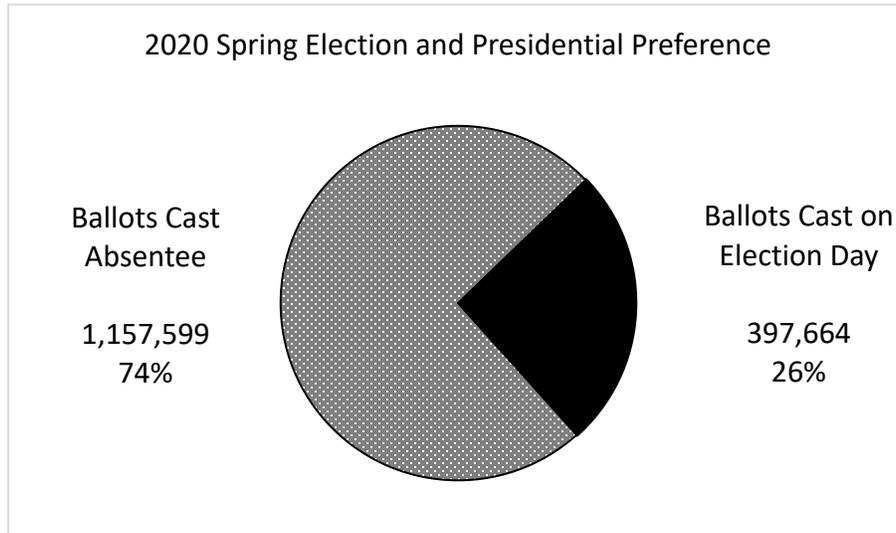
While the COVID-19 pandemic produced an exceptional shift to vote-by-mail, it is not clear that the crisis influenced overall participation. The total ballots cast in the Spring Election and Presidential Preference Vote were not markedly different from previous spring elections. While voter participation for this election was consistent with historic turnout numbers for similar elections, it is also impossible to determine how many voters were unable to cast a ballot for this election due to concerns and complications related to the COVID-19 pandemic. As demonstrated by the chart below, total ballots cast for this election were comparable to the 2008 Spring Election and Presidential Preference Vote and trailed only the same election in 2016 where both major political parties had competitive presidential primaries on the ballot in Wisconsin.

Table 2.



Absentee ballots cast for the April 2020 election also represented a far greater percentage of the ballots cast than is typical. More than three-quarters of the ballots cast were absentee and more than 60% were delivered by mail. Historically, over 80% of ballots in Wisconsin are cast in person on election day and only 6% are cast as by mail absentee ballots. Wisconsin has seen a steady rise in absentee voting percentages in recent years, but those gains could be attributed to an increase in in-person absentee voting, commonly referred to as early voting. For this election, almost 75% of all ballots cast were by absentee voters with over 60% issued and returned by mail. For this election, Wisconsin local election officials saw increases in both in-person absentee voting and absentee by mail, which created resource issues for a system primarily designed to support polling place voting on election day. Some smaller staffs were nearly overwhelmed by the demand and many had to recruit assistance from other municipal departments or secure temporary staff.

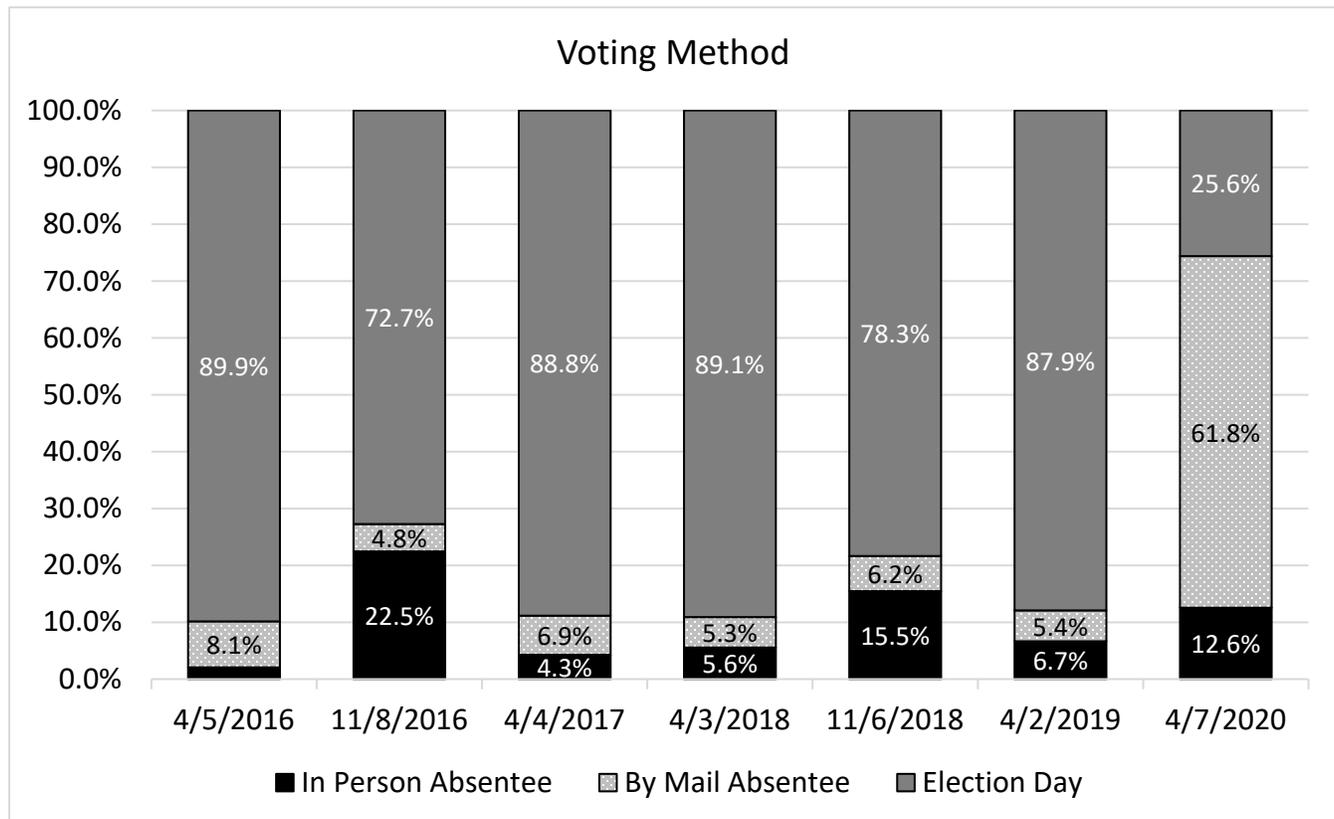
Table 3.



As compared with earlier elections, the 2020 shift to voting by mail is distinct, with barely one quarter of voters choosing to cast a ballot on election day. In person voting on election day was still required for this election and each municipality had to dedicate resources to securing, staffing and supplying polling places, while also processing the increased volume of absentee voting. Almost 400,000 voters cast their ballot at a Wisconsin polling place on election day and each municipality operated at least one polling place. The combination of increased by mail absentee voting and continued support of in person voting has resulted in many local election officials reporting that their 2020 municipal postal budgets have already been exhausted or are on pace for shortages.

April 7, 2020 Absentee Ballot Report
Page 6

Table 4.



Nearly 1.3 million absentee ballots were delivered to voters for the April election, either by mail or in person at local clerks' offices. While almost 90 percent of ballots were returned and counted, approximately 1 in 10 ballots were either not returned to the clerk or were returned but rejected. Almost 121,000 absentee ballots were issued by local election officials, but not returned by voters. This report will provide information about several factors that contributed to the number of unreturned ballots.

Table 5.

April 7, 2020 - Absentee Ballots	Absentee Ballot Count	% of Ballots
Total Absentee Ballots Sent ¹	1,303,985	100.00%
Absentee Ballots Returned and Counted	1,159,800	88.94%
Absentee Ballots Returned and Rejected – After 4/13	2,659	0.20%
Absentee Ballots Returned and Rejected - Other	20,537	1.57%
Absentee Ballots Not Returned	120,989	9.28%

¹ An additional 21,301 absentee ballot records were created by clerks but deactivated for administrative reasons (e.g. clerk error, voter error, voter request, ineligible voter, etc.). This represents approximately 1.6% of the total absentee ballot records. Since 2016, the median rate of administrative cancellations is approximately 2.3% of the total absentee ballot records created, with a range of 1.1% (November 2018) to 4.0% (April 2016).

The figures above are largely consistent with the percentage of ballots rejected or not returned in recent April elections. Both the ballot rejection and unreturned ballot rates were consistent with or lower than the previous rates. This comparison does not seek to downplay the concerns and experiences reported by voters who had difficulty receiving or returning their ballot or voters who could not meet the witness requirement due to COVID-19 concerns. It does demonstrate the Wisconsin vote by mail system for the April 7, 2020 election performed consistently with its performance in previous comparable elections, but there are still several opportunities for improvements. The State is currently pursuing multiple initiatives that will improve the by mail absentee process prior to the fall 2020 elections.

Table 6.

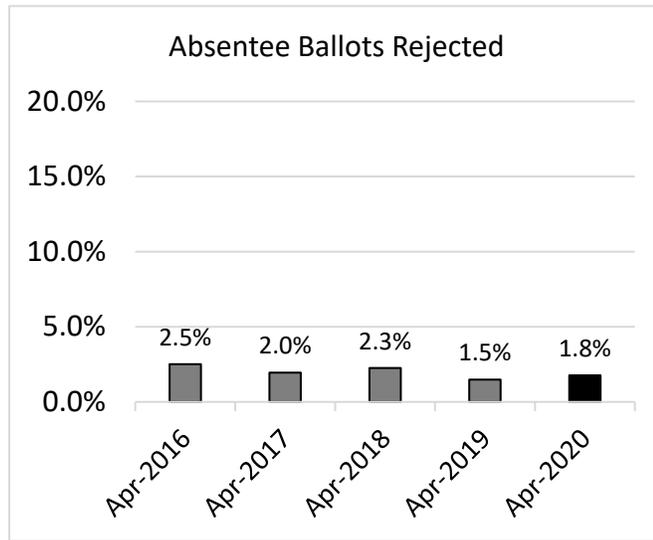
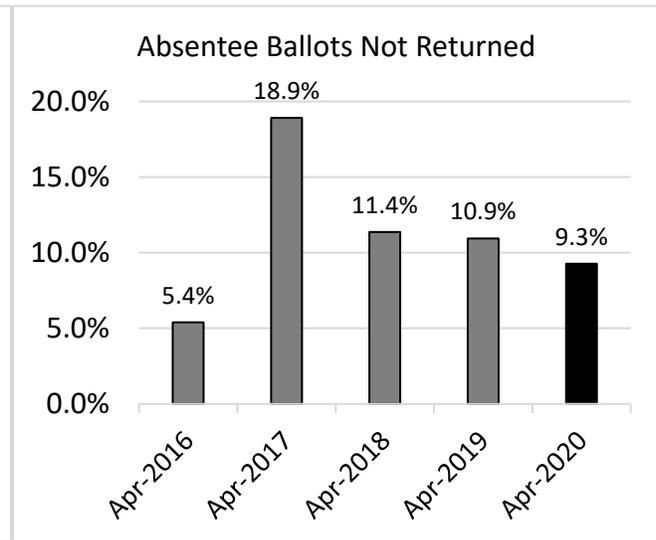


Table 7.



Likewise, most ballots were returned prior to Election Day, but nearly 7% arrived in the window between Election Day and the court ordered deadline of 4:00 p.m. on 4/13/2020. Over 1.1 million of the absentee ballots that were issued for this election were returned in accordance with current Wisconsin state law that requires ballots to be received by 8:00 PM on Election Day in order to be counted. Judge Conley’s extension of the ballot return deadline to 4:00 PM on April 13, 2020 resulted in an additional 79,054 ballots being counted for this election. Local election officials have also reported 2,659 ballots that were returned after the April 13 deadline that were not counted due to their late arrival.

Table 8.

April 2020 Absentee Ballot Return Dates	Absentee Ballot Count	% of Ballots
Total Absentee Ballots Returned	1,182,996	100.00%
Ballots returned before 4/8/2020	1,101,324	93.09%
Ballots returned between 4/8/2020 and 4/13/2020	79,054	6.68%
Ballots returned after 4/13/2020	2,659	0.22%

Additional historical data is attached to this report as Exhibit A - Absentee Voting Data.

III. Findings: Absentee Performance During the April 2020 Primary

A. General Assessment

Wisconsin voters demonstrated an unprecedented commitment to the democratic process in the April 2020 election. In the midst of a COVID-19 pandemic and rapidly changing voting rules and protocols, nearly 1.2 million voters cast an absentee ballot in the Spring Election and Presidential Preference Primary. This section assesses the performance of the absentee voting process during the April 2020 election and examines the experiences of voters, election officials, and election systems. The assessment will consider both a broad overview and examine specific case studies from across the state.

1. The Absentee Process in Wisconsin

The Wisconsin Legislature has determined that the vigorous exercise of our constitutional right to vote should be strongly encouraged. The Legislature also recognizes that it is difficult for some individuals to get to their polling place on Election Day. In order to meet this need, the Legislature has established the privilege of absentee voting as an extension of the right to vote on Election Day. The Legislature recognized that the privilege of voting absentee is exercised wholly outside the traditional safeguards of the polling place. It has determined that the privilege of absentee voting must be carefully regulated to prevent the potential for fraud or abuse, overzealous solicitation of absent electors who may prefer not to participate in an election, and undue influence on an absentee elector to vote for or against a candidate or referendum. Wis. Stat. § 6.84(1).

Any qualified elector who is unable or unwilling to appear at the polling place on Election Day may vote by absentee ballot. Wis. Stat. § 6.85. Registered electors wishing to vote absentee must submit an absentee ballot request in writing to the municipal clerk. The request is made to the municipal clerk in writing or electronically using the Application for Absentee Ballot (EL-121), or a letter requesting an absentee ballot which provides the information required on the application form. The written request should include the elector's: 1. Name 2. Residential address 3. Mailing address, if different than residential address 4. Signature 5. Proof of identification, if necessary. Military and Overseas electors may also use the Federal Postcard Application (FPCA), which is a combination registration form and absentee ballot request. Voters may also apply for and vote an absentee ballot in person at the municipal clerk's office. Wis. Stat. § 6.86.

Municipal clerks prepare official absentee ballots for delivery to electors requesting them. An absentee ballot must be sent to any voter with an absentee application on file, no later than 47 days before a federal election, and no later than 21 days before a primary or other election. Otherwise, the municipal clerk shall send or transmit an official absentee ballot within one business day of the time the elector's request for such a ballot is received. Wis. Stat. § 7.15(1)(cm).

The municipal clerk or the clerk's designee is required to enter absentee applications and ballot information into the WisVote system maintained by the Commission within 48 hours after mailing or receiving an in-person absentee ballot application. Wis. Stat. § 6.33(5). Or, in the case where the

municipality relies on the county or another municipality, the clerk shall submit the information to the clerk's WisVote provider, and the provider shall enter the absentee information into the WisVote system within 24 hours. Wis. Stat. § 6.33(5).

2015 Wisconsin Act 261 charged the Government Accountability Board (G.A.B.), and later the Wisconsin Elections Commission, with developing a subscription service that would allow the public to access absentee ballot data that is tracked in WisVote. Given the implementation of the absentee subscription service available in BADGER Voters as well as increase in absentee voting and the growing public interest in obtaining absentee ballot data, it is important that clerks are able to timely and accurately enter absentee ballot data into WisVote including entry of absentee applications, issuance of ballots, and recording ballot statuses. The WEC staff plays an important role in assisting clerks with entering and tracking absentee ballots in the WisVote system.

a. Support Provided by the WEC

Commission staff do not process or send absentee ballots to voters in Wisconsin; all requests are required to be fulfilled by a local municipal clerk. However, Commission staff provide a range of both technical and direct support to municipalities for the absentee request process. The Commission provides access to and maintains the WisVote system and the MyVote website, along with technical support and training related to these products.

The WisVote system is the primary administrative means of tracking and supporting the absentee process in Wisconsin. Along with voter registration records, WisVote allows clerks to track absentee requests for single and multiple elections, create records for issued ballots, and record the final disposition of ballots. Centralized absentee tracking allows Commission staff to monitor and support clerk compliance with Federal and State UOCAVA requirements. It also allows Commission staff to gather and submit federally required absentee information to the U.S. Elections Administration Commission on behalf of all Wisconsin clerks.

WisVote has several built-in reports and report-building functions to further support clerks in the entering and tracking of absentee applications and ballot records. Commission development will also create new reports based on clerk feedback and needs, such as the recent Photo ID Not on File report created to assist clerks in finding and entering any absentee applications missed due to the large influx of requests. This report was created, tested, and deployed in less than one week.

The MyVote Wisconsin website is another integral piece of the absentee voting process. MyVote is a public-facing website that provides a central location for voters to submit an absentee ballot request regardless of where they reside in the state. All requests submitted via MyVote are then transmitted to the municipal clerk via an email notification that includes a copy of the photo ID file, if required, and a PDF version of the absentee request that includes election information, delivery method, and separate mailing address, if provided. MyVote reduces the number of misdirected absentee requests and speeds the absentee process by providing a standard email to assist in organizing emailed requests and

automatically assigning them to the correct jurisdiction based on the voter's address. When a photo ID is not required, the MyVote site will create the tracking record in WisVote automatically while still sending the notification, removing the data-entry requirement for these requests. Voters who do not use the MyVote site may send absentee requests to the incorrect jurisdiction, or even the Elections Commission directly, which leads to requests being delayed or even unfulfilled if the misdirected request is received after a statutory deadline.

Commission staff maintains and develops extensive training materials to update clerks on changes to WisVote and MyVote while also allowing new clerks to obtain the necessary training to use these systems effectively. All clerks and their support staff are given access to an elections training site referred to as The Learning Center ("TLC"). The site includes interactive training modules covering the various functions of WisVote and links to all training webinars produced by Commission training staff. Commission staff also publish and update a user manual for WisVote which includes detailed instructions on using the various functions and features of WisVote. Along with these existing materials, Commission training staff produce and record several training webinars during each election cycle to review topics of concern, preview/review recent updates to WisVote and solicit clerk feedback.

b. Processes at Individual Communities

The absentee request and fulfillment process will include many of the same processes regardless of municipal size or circumstances. Requests must be reviewed to determine type and period of request, if the voter is currently registered, within the jurisdiction, and if an acceptable photo ID was required/provided. All municipalities must mail/email/fax any ballot requests themselves and have a supply of envelopes and ballots to do so. Based on request volume and municipality size, clerks may use WisVote to generate mailing labels while other municipalities will opt for hand-written labels. If a clerk is a self-provider, has WisVote access and tracks their own information, they would also enter the necessary information into WisVote. In municipalities where the clerk is not a WisVote user, they will contract with another municipality or county to enter this information on their behalf while reviewing and fulfilling any absentee requests directly.

For a more detailed accounting of how various municipalities handled the absentee process, please see the Case Studies section below.

2. Voting for April 2020

The April 7 Spring Election and Presidential Preference Vote was by all definitions unprecedented. Wisconsin was the only state thus far to conduct a statewide election during a COVID-19 pandemic stay at home order. Wisconsin is also the most decentralized state for election administration, meaning that 1,850 municipal election officials and 72 county election officials had to adapt to significant changes from court rulings, public health guidance and voter behavior shifts towards vote by mail.

The surge in absentee voting was first felt on the MyVote Wisconsin website. On the MyVote website, voters can request an absentee ballot, track when their ballot was sent and received by their clerk,

register to vote online, find their polling place, view a sample ballot, view their voting history, and more. The site was built and updated regularly by WEC staff with extensive usability studies conducted with hundreds of voters to learn how they use the site.

Based on historical data, most voters went to MyVote to find their polling place or to view a sample ballot. Site analytics show this to be true in February 2020, where traffic to the polling place look up tool reached a new record high. Features like requesting an absentee ballot were previously used by voters, but never at the rate they were utilized in the lead up to the April 2020 election. As a result, the look up tools garnered more attention from developers prior to the COVID-19 pandemic.

To accommodate the rapidly evolving environment, WEC staff were required to make more than a dozen changes to the MyVote system in the 60 days prior to the election. Deadlines for online voter registration and for absentee requests were extended multiple times by court actions prior to this election and deadlines for ballots to be returned and witness requirements were also changed initially, but then changed back. Because this information is hardcoded in the MyVote system, each change required extensive reprogramming and testing to avoid unintended consequences.

The other statewide system supporting the absentee process is WisVote. The WisVote database is the system used by almost 3,000 local election officials to administer elections. While WisVote and the WEC do not issue ballots, the clerks use WisVote to record when they send and receive absentee ballots, generate an absentee ballot log, enter voter registrations, and record voter participation. The system was built by the WEC team and launched in 2016.

WisVote was built based on the way Wisconsin conducts elections, which involves mostly voting in-person at the polls and registering to vote at the polls on election day. By mail voting and registration options are accounted for in the system, but most municipalities had never received a large volume of absentee requests for a specific election prior to this election. Clerk activity in WisVote prior to the election was much higher than any prior election because clerks were all entering and issuing record numbers of absentee requests at the same time. The system performed very well but required around the clock monitoring and auditing to handle this unique and unprecedented user behavior and traffic.

Like MyVote, WisVote required several updates to accommodate extended deadlines for absentee requests and online voter registration. These extensions meant changing automation in the system to assign voter records and allow requests to new deadlines and elections. WEC staff also monitored capacity of the system to ensure adequate memory space. Multiple increases of memory were needed to keep pace with absentee requests and attached copies of photo ID's. WEC staff also created two significant new processes to assist local election officials with the new volume of absentee requests.

One change was to create an absentee ballot request report that documents when a voter submits a request that includes a photo ID. This change was significant because it allowed WisVote to view photo ID files within the system. This process is usually completed by email. Photo files are very large, therefore the storage and capacity in WisVote had to be significantly adjusted.

WEC staff also created “poll book” reports or pages so that jurisdictions with consolidated polling places could use the WisVote system to check in voters, produce and print an individual poll book page for them, and record new registrations and participation in real time on election day. These were not processes that had been conceptualized previously and required significant development and testing completed in one week.

As the enormous quantity of absentee ballots began entering the mail system, voters began asking more questions and expressing concerns about ballot deliveries. With nearly six times more ballots in circulation, the number of complaints and concerns increased by a similar amount. Some voters also reported not receiving their absentee ballots while others reported that their completed ballots were not returned to the clerk in a timely fashion. Starting on April 8, municipalities began reporting irregular or illegible postmarks on ballot return envelopes. WEC staff asked clerks to report their postmark and mailing issues to the USPS and the WEC for investigation. Findings from that research is discussed in the Case Studies section below.

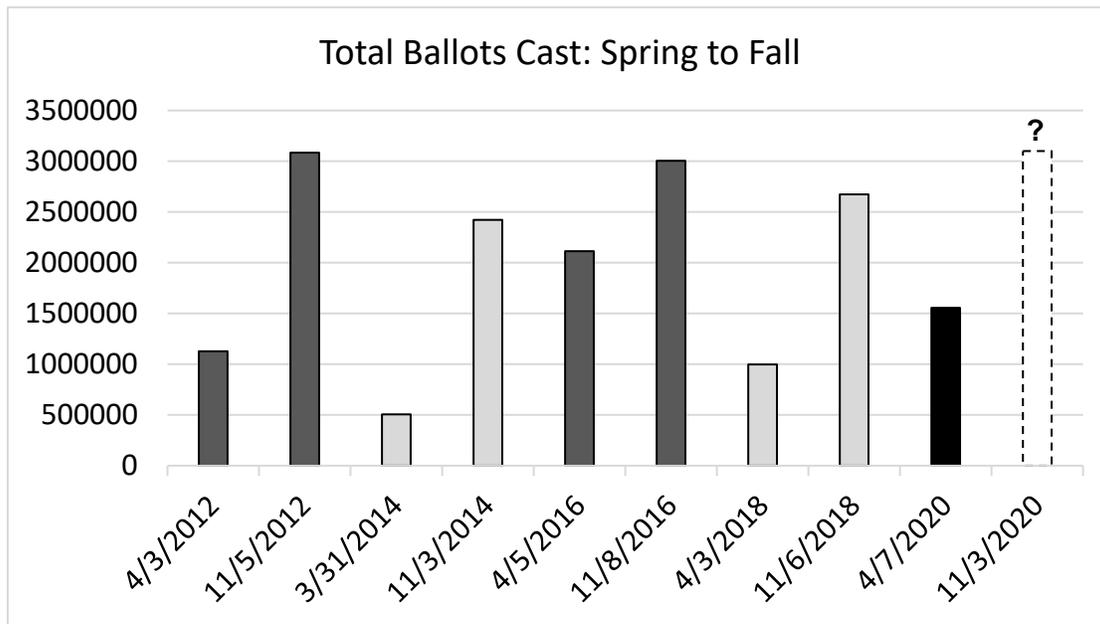
WEC staff also worked with local election officials to understand and collect postmark examples and postal issues. WEC then worked with USPS personnel at the local, state, regional, and national level to get information about the postmark process. Ultimately, USPS provided information that each postal branch made best attempts to postmark ballots on election day, but in the case of missing or illegible postmarks there was no way to determine what date the ballot was marked. WEC staff also sent a letter to local, state, regional, and national USPS representatives asking for them to provide additional information on ballots that were not received and on outgoing ballots that were returned to municipalities without explanation. A response has not yet been received.

Finally, any report on the April 2020 election must include mention of the tremendous support received from partners not typically involved in the elections process. In addition to our regular law enforcement partners, the WEC received exceptional support from the State Emergency Operations Center, Wisconsin Emergency Management, the Wisconsin National Guard, the Wisconsin Department of Health Services, and the federal Cybersecurity and Infrastructure Security Agency. These agencies, working closely with Wisconsin’s 72 county clerks, played a key role in distributing personal protective equipment, sanitization supplies, and even poll workers to more than 2,000 polling places across the State.

3. Other 2020 Elections

Looking ahead to the remainder of 2020, the WEC staff anticipate continued high demand for by mail absentee voting, even if the COVID-19 pandemic begins to subside. November elections generally see high turnout, particularly in presidential election years. The last three presidential general elections all saw more than 3 million ballots cast. If voting patterns from April hold true, the state could see more than 1.8 million requests for absentee ballots by mail. This kind of volume would present terrific challenges for Wisconsin election officials at all levels.

Table 9.



November presidential elections also tend to see a greater proportion of inexperienced voters. That is, voters who vote infrequently or are voting for the first time. These less-experienced voters are more likely to have difficulty navigating the absentee voting process. As a result, the clarification of the process may help voters in November.

B. Specific Case Studies

The absentee voting experiences of voters and election officials were as varied as the 1,850 jurisdictions in the state. Nearly every community experienced unprecedented absentee request volume, and many hired temporary staff to cope with demand. Many small and medium size jurisdictions learned to use WisVote absentee batch processing tools for the first time, having never previously needed any automation assistance to manage their workload. Larger cities, while used to higher volumes, were forced to work around the clock and conduct much larger batch mailings than previously experienced. For all jurisdictions, the statutory requirement to mail ballots within 24 hours of receiving a request presented a significant challenge.

This section examines specific challenges, problems, complaints, and solutions reported by municipal, county, and state election staff.

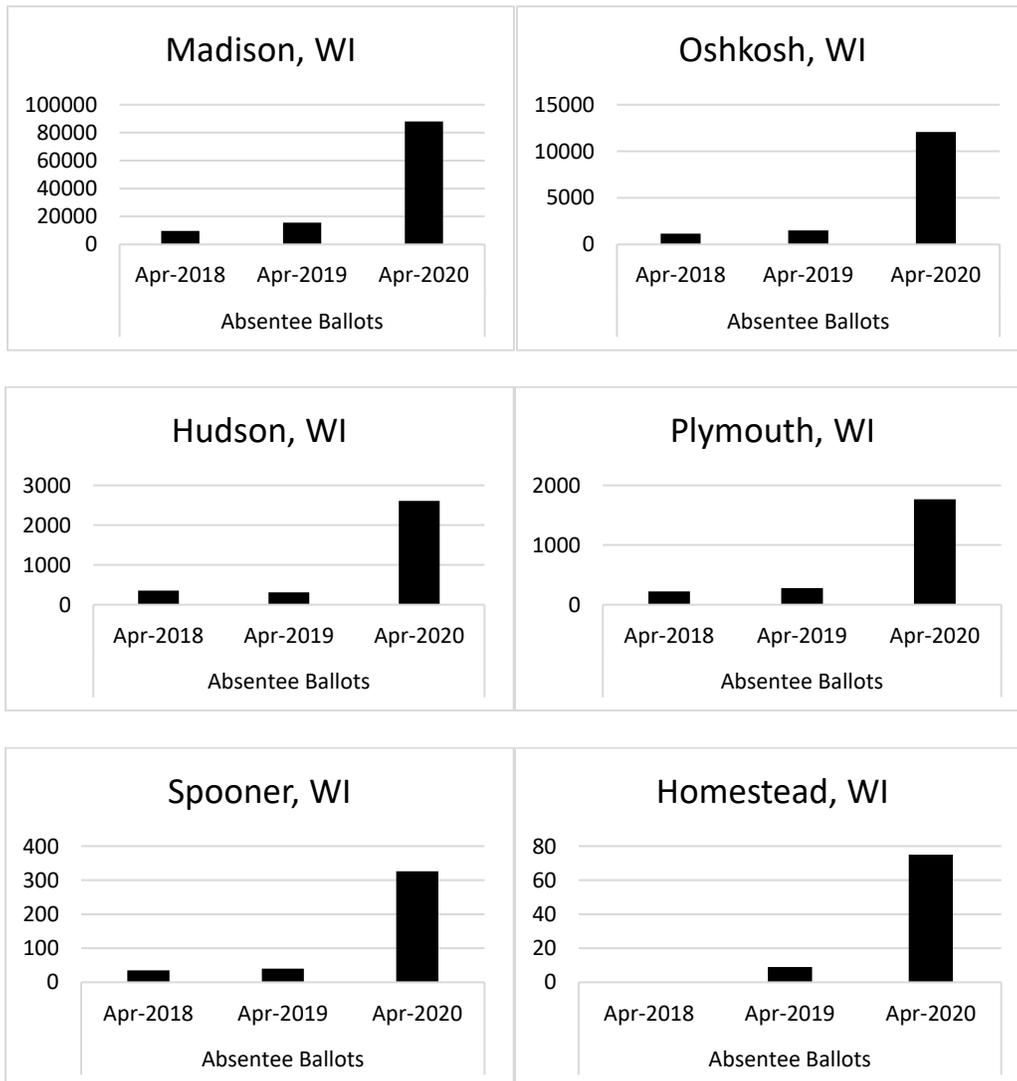
1. Meeting Overwhelming Demand

The most fundamental challenge faced by election officials was simply meeting the unprecedented demand. In addition to keeping up with the requests for mailed absentee ballots, clerks continued to service voters in their office wishing to participate through in-person absentee voting. On top of that, clerks were tasked with providing polling places with equipment on election day to meet appropriate

CDC guidelines, not to mention the challenge of recruiting and training new election inspectors taking the place of long-serving election inspectors, many of whom chose not serve due to their risk category to COVID-19. While meeting the requirements above, clerks had to remain in communication with the WEC on updates and changes applied by all levels of the legal system. Most critically, hundreds of Wisconsin clerks had to complete all the tasks above while working alone and part time.

The increase in demand appeared consistent across the state, with large, medium and small jurisdictions all showing similar patterns.

Table 10.



Rapidly changing guidance further complicated the environment for clerks. Multiple decisions in the weeks leading up to election day required clerks to communicate new deadlines and requirements impacting voters who may have received conflicting information made no longer relevant by late hour court decisions. No city, village, or town was able to avoid these extraordinary challenges presented in

addition to the increased demand for absentee voting – and their efforts navigating all the situations presented by the pandemic should not be overlooked.

For elections prior to the April 7 election, the City of Racine managed ballot requests received by email with just one election staffer who printed and distributed the requests to four additional staff members for entry into WisVote and for the records to be filed according to public records statutes. Once the pandemic hit and absentee request volume grew exponentially, the city quickly adapted by recruiting 20-30 additional city staff members to process absentee ballot requests from printing the request to sending the ballot out the door. Staff are still catching up on filing these documents appropriately.

Some communities, like the Village of Cottage Grove (Dane County), were fortunate to have hired and trained new elections staff just before the pandemic crisis began. Staff were able to manage the demand for absentee ballots by printing off every email notification of an absentee ballot request, whether it required photo ID or not. A staff of three processed each request individually, ensuring the steps of entering the request, issuing the ballot, printing the label, and applying it to the ballot occurred for every printed email. High school students were brought in to assist with the manual work of stuffing envelopes with ballots, while the clerk staff managed work in the voter registration system and fielded calls from voters with limited experience with absentee voting and navigating MyVote. Clerk staff found some success when directing voters to use smartphones (when available) to upload a copy of their photo to complete the absentee ballot request process.

Even the smallest of jurisdictions were not immune from the increased demand. While they did not have to contend with thousands of requests, individual town clerks often worked alone and with limited resources. In the Town of Washington in Shawano County, a part-time clerk went from managing eight absentee ballot requests in February to processing 312 in April. Many clerks were in a similar position of putting in extra hours to scale up their election's operations with no additional compensation, all while balancing a separate full-time job.

To provide clerks adequate time to complete all their election responsibilities, WEC is committed to reducing the administrative burden of data entry required by the current absentee ballot request process. Proposed adjustments to the system include generating a pending absentee request in WisVote that can be approved or denied once photo ID is reviewed. Additionally, WEC hopes to assist clerks with common issues with absentee ballot requests, such as "selfies" submitted as photo ID, by communicating that information back to the voter through MyVote or available email or phone contact information. Finally, the staff recommends conducting voter outreach programs as described in the CARES Grant memorandum associated with this Commission meeting.

2. Concerns about Mail Service

Clerks in some parts of the state encountered issues with absentee ballots reaching voters or being returned to their offices. In some cases, voters expected to receive a ballot when a request was not submitted or not completed. These issues are discussed further under Voter Experience & Education below. After ruling out cases of voter error, there remained cases that could not be explained or could

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not be explained definitively. For example, the City of Oshkosh and other Fox Valley communities all reported voters complaining that their ballots were arriving late or not arriving at all. WEC staff investigated each complaint received where enough information was available to identify the voter.

On the morning of April 8, 2020, WEC staff received a telephone call from a Political and Election Mail Coordinator at the Great Lakes Regional office of the USPS in Chicago. The USPS official reported that the post office had located “three tubs” of absentee ballots for the Appleton/Oshkosh area and that the ballots were being processed. The official was unable to confirm how many ballots were in the three tubs but stated that “it could be quite a lot” as they were large two-handled tubs. In a follow up communication, the USPS indicated that there were approximately 1,600 ballots in the batch.

WEC staff attempted to follow up with the USPS to further identify the ballots and determine what happened but did not receive any further information about these ballots. Written inquiries to the USPS did not produce any specific information about these ballots. Wisconsin’s two U.S. Senators have asked the USPS Inspector General to investigate, but WEC staff have been unable to learn anything about the status of the inquiry.

The WEC also investigated reports from the City of Oshkosh suggesting that ballot requests were received but not fulfilled. While many of the cases involved incomplete requests (e.g. no photo ID provided) other records appeared complete. WEC staff researched several dozen Oshkosh area ballot requests that were entirely valid, including those of Assembly Representative Gordon Hintz and his spouse. The ballot records in question were generated as part of a batch on March 24, and analysis of the ballots associated with it showed that a large part of the batch was not returned by voters. Of the first quarter of records generated, more than 90% were returned. Of the remaining three-quarters of records, less than 1% were returned. This suggests that something happened to the ballots in the latter portion of the batch.

WEC and Oshkosh staff could find no evidence of a technical failure. The Oshkosh batch was produced very quickly by the system (two minutes and seven seconds), did not include any unexpected applications, and occurred during normal operating hours when no system maintenance was underway. Furthermore, the City of Oshkosh Clerk reports with confidence that the ballots were mailed to voters. Thus, in this case, there is no evidence of a system error and no evidence of a printing problem. Instead, one of two events are possible: either a user did not apply the mailing labels to ballot envelopes, or these ballots were bundled together and collectively encountered an issue in the mailing process.

As with the larger cities, smaller municipalities also reported issues with ballots reaching residents or being returned to the clerk in a timely fashion. The Village of Fox Point was among them and experienced an unusual chain of events that garnered some media attention. For two weeks, absentee ballots that were supposed to be mailed to Fox Point residents were repeatedly returned to the Fox Point Village Hall by the post office before reaching voters.

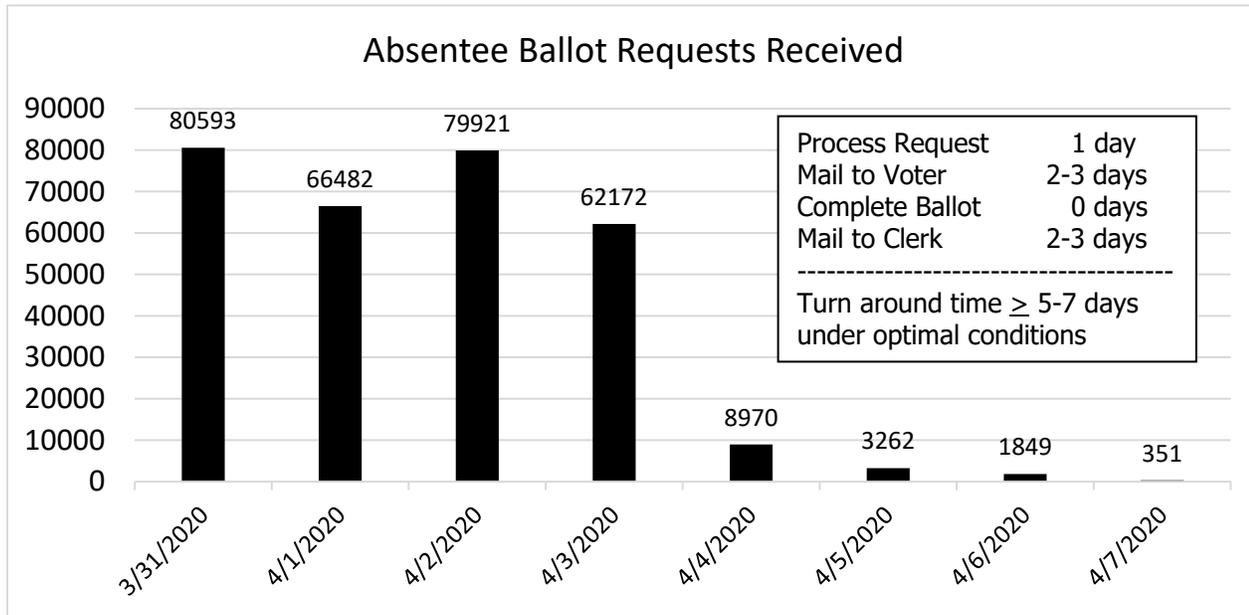
The village reported receiving anywhere from 20 to 50 of these returned absentee ballots per day two weeks ahead of the election. The problem continued to grow as election day neared. In the week prior

to the election, 100 to 150 ballots per day were returned to the village. On the morning of Election Day, Fox Point Village Hall received a plastic mail bin with 175 ballots. In each case, the returned ballots were unopened, unmarked and had not been received by voters. The postage was not cancelled, and no explanation was provided.

Each time they received a batch of absentee ballots, village officials immediately drove the ballots back to the nearest post office. They asked post office supervisors what was wrong with the ballots, but they did not receive any explanation. Fox Point Village Clerk Kelly Meyer reports it is unclear how many voters were affected by the undelivered ballots. Residents who did not receive an absentee ballot in the mail were advised to vote in person at their polling place on Election Day. Residents who called village hall inquiring about their absentee ballot on Election Day could retrieve their ballot from village hall if the ballot still un-sent and the resident could confirm their identity with a photo ID.

Statewide, the volume of absentee requests received remained high in the week prior to April 7th. Clerks received over 60,000 requests alone on the Friday before election day. Even if all these requests were mailed on Saturday, it is unknown how long those ballots took to reach voters. Current capabilities do not permit election officials to monitor the movement of ballots in the mail system. Thus, the next data point available to election officials is the date the completed ballot is returned to them.

Table 11.



The absence of information about ballots in the mail system is a significant concern for voters, clerks, and Commission staff. To improve visibility of these ballots, WEC staff are working to incorporate Intelligent Mail Bar Codes (IMBs) as a tracking tool for future absentee mailings. The IMB is a 65-bar USPS barcode that allows internal tracking information to be shared with the mailer and or recipient.

Although still dependent on the postal service, the IMB allows greater visibility of individual pieces in the mail stream. IMBs and tracking tools are discussed further in the Recommendations section below.

3. Process Improvements

The enormous volume of absentee requests for the April 2020 election magnified the effect of typically small concerns that ordinarily presented minor issues. Complex process flows that were a minor annoyance in prior elections became major headaches for April. Counties faced a particularly difficult challenge of attempting to complete the data entry for multiple relier communities where the absentee voting rates had previously been low. This data entry provides these voters with the opportunity to track their ballot on MyVote.

For example, in Shawano County, the clerk's office typically has three staffers but operated with just two as a result of the pandemic. This reduced staff of just two people was responsible for entering the absentee information for 25 municipalities. The Shawano County staff encountered problems working in the voter registration system, including the inability to pull reports at the county level. Additionally, the ballot count associated to an absentee application does not always immediately update due to allocation of system resources, creating confusion for users looking for confirmation a ballot was created and slowing the processing of information.

Grant County, located in southwest Wisconsin, also provides absentee processing support for its municipalities. Grant County is made up of 52 municipalities, 41 of which rely on the county to enter and update the status of their absentee ballots in WisVote. Previously the volume of absentee ballots was manageable through a simple absentee ballot log passed between the municipality and county. The county clerk's office revamped this absentee ballot log and asked all 41 reliers to stick with the standard format in the weeks leading up to April 7. The log asks for the necessary information to enter it correctly and efficiently in the voter registration system. The county also asks the reliers to highlight any changes from the last time the absentee ballot log had been sent so they could focus on the work to be completed.

Another contributor to processing time is the requirement to individually validate the photo identification of each voter. While validating any one request is quick, the manual nature of the process proved challenging when contending with high volume and simultaneously responding to hundreds of voter inquiries. Compounding the problem was the fact that MyVote shows only complete, accepted requests. Voters with a request pending ID approval are given no indication that their request is on file. Improving feedback to voters, and tools available to clerks, is therefore a top agency priority before the August 2020 election.

4. Technical Problems.

Some voters and clerks have questioned if technical failures caused absentee requests or ballots to be lost. As a result, WEC technical staff spent considerable time researching this possibility both before and after election day. Detailed audits were performed on individual complaints and no technical problems were detected prior to election day. WisVote and its associated systems maintain meticulous

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details of each and every transaction occurring in the system, precisely when it occurs to the fraction of a second, and who or what executed the transaction. These highly detailed records allow staff to retrace events, locate errors, and validate system operations. The records enabled staff to review tens of thousands of transactions from hundreds of jurisdictions. This research revealed one isolated and unique incident where technology and volume combined to create an error. Staff found no evidence of any technical error that could have caused an absentee ballot request or a completed ballot to be lost.

The single failure identified came to light after the City of Milwaukee's Election Commission (MEC) conducted a post election review that could only be identified after election participation was entered. Upon investigation, MEC staff discovered that the WisVote record for tracking this voter's ballot had been created in the middle of the night, at a time when MEC staff would not have been creating ballot records. They further determined that the ballot record was associated with a batch. A batch is a WisVote entity that allows clerks to select broad categories of absentee application records and request the system create ballot tracking records and subsequently generate mailing labels for each of those absentee applications. Many of the absentee ballots associated with this batch had been created in the middle of the night, and many of them had not been returned. MEC referred the issue to the WEC for further investigation during the post-election data reconciliation process.

Upon initial analysis of the batch, WEC staff identified trends that appeared similar to the Oshkosh case. As in Oshkosh, there was a sharp decline in ballot return rates for a specific subset of ballots. Of the 5,913 ballot records created on or before 10:42:32 p.m. on March 22, 5,237 were recorded as having returned in some way to the clerk's office. This is an 88.5% return rate. Of the 2,693 ballots generated after 10:42:32 p.m., only one was recorded as returned.

Further investigation disclosed several factors unique to Milwaukee. In particular:

- It was the largest batch processed by WisVote; ultimately including 8,607 absentee ballot request records. The median batch size for the same day was 32 records.
- It started at 5:16 p.m. on March 22 and did not complete until 1:31 a.m. on March 23. Typically, batches complete within a few minutes.
- Of the absentee application records associated with the batch, many were created **after** the batch was generated. Since the first thing the batch does is select the absentee application records that match its criteria, this should not be possible.

Upon review, it was determined that the timeframe of this particular batch overlapped with maintenance on a known server issue. On March 22, WEC staff observed high utilization rates in some WisVote servers that could potentially cause user interface degradation, such as slow page loads or poor performance of some tasks. In consultation with Microsoft, plans were made to implement server improvements to prevent further issues. In the interim, system resources were freed by restarting the servers that process background jobs, called asynchronous servers. Background jobs are intended to be short-running, and by restarting one server at a time during a period when few users would be interacting with the system, staff believed that WisVote's load balancing would shuffle background jobs as needed and there would be no impact. That has been staff's experience in past server restarts, and in

testing no impact was observed. However on subsequent code review it was determined that it is possible, if a batch workflow is restarted, for that workflow to select applicable ballot requests a second time, which would generate ballot tracking records for absentee applications not originally associated with the batch.

It is staff's belief that an extraordinary confluence of events resulted in additional ballot records being generated after MEC staff printed their mailing labels, leading MEC to believe those ballots had already been sent when in fact they had not. First, Milwaukee's extraordinarily large batch of more than 8,000 ballots, exacerbated by the high user load on the system in the run up to the April election, resulted in the processing of this batch taking several hours, instead of a few minutes. Second, unbeknown to MEC, Commission staff conducted an unscheduled restart of the asynchronous servers to address an unrelated issue, interrupting this long-running job. Third, an oversight in the development of this process meant that the system failed to handle the restart gracefully, selecting an entirely new collection of absentee applications instead of continuing from where it had been interrupted.

Since the database contained detailed information tracking batch creation, staff could develop precise criteria to determine the impact and review transactions across the state. As a result, staff can conclusively determine that this restart issue only impacted this one batch in the City of Milwaukee. As a result of this issue, staff believes that 2,693 requested ballots were never sent to City of Milwaukee residents. Of the affected voters, 52.5% voted in the election either on a replacement absentee ballot or at the polls on election day.

Ensuring the voting rights of Wisconsin citizens is a hugely complex task without room for error. It requires, at a minimum, the ability to immediately identify and remedy errors before they affect the voting process. In this instance, detailed records enabled agency staff to retrace these events, but they did not provide information in a proactive manner allowing a system problem to be identified in real time. Neither clerks nor the state would have been able to identify this issue in real-time or based on single voter reports. Staff are now adopting real-time performance tracking tools for IT professionals and building user-friendly audit tools for clerks and other election officials. Measures to identify and avoid technical failures like this one are discussed in the Recommendations section below.

5. Voter Experience & Education

The April 2020 election introduced hundreds of thousands of voters to the absentee process for the first time. Naturally, many were unfamiliar with the process and did not understand the requirements. Common errors included:

- providing a written request (letter or e-mail) with insufficient information
- submitting a personal photograph instead of an acceptable form of photo ID
- not completing the on-line application process

An additional complication resulted from third parties mailing absentee application request forms that did not adequately highlight the photo ID requirement. In these cases, the clerk was unable to fulfill the

request until they could follow up with the voter to obtain a valid photo ID. Most voters do not provide a phone number or email, so the clerk must rely on a mailed notification to the voter that their request is not yet valid. Clerks in these situations were often unfairly blamed for not fulfilling a request that was not valid in the first place.

WEC staff believes that the creation of voter outreach programs to explain the absentee voting process will be beneficial, particularly if demand for absentee ballots remains high.

IV. Recommendations: Proposed Courses of Action

A. Assessment Resources. WEC staff is working with various partners to assess and improve the absentee voting experience. Changes to the voter registration system, public facing websites, and paper forms and envelopes will largely impact individuals outside of the agency, and the Commission should provide opportunities to receive and incorporate feedback from our core users.

In addition to the existing Clerk Advisory Committees, a new Clerk Advisory Committee dedicated to Vote by Mail revisions has been created and is meeting on a weekly basis to provide direction and feedback on staff proposals. The committee is composed of clerks from jurisdictions of various sizes and resources. A separate committee dedicated to "reliers" -- clerks who rely on the county or another municipality to complete some or all of their WisVote work -- will also be convened so that new workflows meet their unique needs.

Staff is also working with non-profits in the elections space who are stepping up their efforts to support the nationwide increase in absentee voting. Staff reached out to the Center for Civic Design for guidance on holding and recruiting inexperienced and first-time voters for remote, video conference usability sessions. The Center for Civic Design has previously trained staff on making user-centered design decisions through holding usability sessions, where voters are asked to test-drive new or updated products such as the absentee ballot request form. Staff is in the process of holding remote video conference sessions with voters.

WEC staff is also working with Democracy Works - a nonprofit that builds software applications to assist voters and election officials. WEC has been working with Democracy Works since 2011 in providing our Voting Information Project data feed, which serves as our alternate means for voters to locate Election Day polling places. Ballot Scout is another Democracy Works product that tracks absentee ballots using information from USPS via their Intelligent Barcode and Informed Visibility mail tracking system. Ballot Scout can be inserted as a "widget" or feature into a website like MyVote, allowing voters and clerks to track a ballot as it travels through the USPS mail system.

Since April 23, USPS Election Mail and Business Mail integration experts and WEC staff have been meeting weekly. The focus of these meetings is to provide WEC staff with guidance on the implementation of intelligent mail barcodes and support in absentee ballot envelope revisions. USPS is committed to building a relationship with our agency with the goal of improving the experience of voting by mail in Wisconsin.

B. Ballot Request Process

Staff, clerks, and voters have provided ample observations on how to improve the absentee ballot request process. Voters are required to submit a written request to their municipal clerk to receive an absentee ballot. Requests can be submitted in a standard format when requested through MyVote and when using the Absentee Ballot Request form (EL-122) or can be submitted in an unstandardized format through an email or mail correspondence. No matter how the voter submits it, any request that gets to the clerk must be entered by hand into the voter registration system. Many first-time absentee voters visited MyVote in the weeks up to the April 7 election to request their ballots where they had to navigate unfamiliar language and requirements such as uploading a photo ID.

In response, WEC staff will focus on three specific improvements to the process of requesting an absentee ballot. First, we recognize that technology and internet is not accessible to all voters. WEC staff is revising the paper Absentee Ballot Request form (EL-122) to be more user friendly and is exploring the opportunity to mail this form to every registered voter without a current absentee ballot request on file for 2020. Additional directions on how to provide a copy of a valid photo ID will be required for this mailing. Second, while hundreds of thousands of voters successfully navigated the absentee ballot request process on MyVote, the process can be improved, particularly in the areas of photo ID upload and confirmation of submission. Finally, information submitted to clerks through MyVote should not require manual data entry into the voter registration system or rely on an email-based process for most users. WEC staff will work with clerks and voters to review new designs before implementation of these three improvements ahead of the 2020 Fall elections.

C. Mailing Process and Ballot Tracking

In its current state, the mailing process for absentee ballot requests allows each jurisdiction flexibility to approach the process in the manner that best meets their needs. As a result, there are situations that lead to less visibility of the ballot's mailing status that may not be ideal. One potential direction for improvements in WisVote is integration of USPS Intelligent Mail Barcodes. Integrating Intelligent Mail Barcodes would allow those who use the Absentee Ballot mailing label features within WisVote to track the delivery status of the absentee ballot.

The USPS has the ability to allow WEC to generate a unique serial number from within WisVote; once the unique serial number is generated, the Absentee Ballot mailing label can be printed using a font that translates the unique number into a bar code used to identify a mail piece as election mail. The bar code also enables scanning and tracking the mail piece as it progresses through USPS facilities. For those who choose to use this function within WisVote once it is developed, clerks will be able to generate and print a label with a barcode that the USPS would then scan once the mail pieces is received at a Postal Service location. Once the mail piece is received, tracking information can be updated as frequently as every hour to track the current location and projected arrival of the mail piece.

With tracking information provided by USPS, WEC can provided specific updates and enhanced transparency into the vote by mail process to clerks and voters. The hope is that with this addition, the

number of calls and emails to clerks will be greatly reduced as voters will be able to track their ballot by accessing MyVote or receiving push notifications to an email or phone number. WEC staff is currently evaluating options for integrating this data and evaluating the effects this may have on existing clerk workflows as well as feasibility and timelines.

While evaluating these options and potential for tracking ballots and their return, we are also very cognizant of WisVote relier clerk access to this information and how reliers may be able to obtain the barcode for their mail pieces. This specific topic requires quite a bit more consideration and input from relier community clerks. WEC staff is actively pursuing input from those clerks in order to carefully assess their current workflow and any potential assistance that could be provided by the intelligent mail barcode tracking as well as any potential unintended workflow requirements that may be imposed on those reliers. Integration of tracking via the intelligent mail barcode will increase the transparency of the mailing process for absentee ballots as they are delivered to voters and as they are returned to their municipal clerk.

D. Reports and Audit Tools

Wisconsin's voter registration system serves many purposes for clerks and voters. It maintains the list of registered voters, the set of candidates and contests assigned to specific districts, tracks absentee ballot requests and ballots, houses the data displayed to voters on MyVote, and generally facilitates the administration of elections in Wisconsin. Due to the current pandemic environment, the administration of elections is changing to occur increasingly by mail and the voter registration system must be adjusted to support that shift.

The voter registration system currently offers multiple methods to manage absentee ballot request and ballot records, originally meant to meet the needs of all sizes of communities in Wisconsin. While meant to be helpful, multiple methods can create confusion among clerk staff using different methods within an office and require WEC staff to adequately train and support all methods. As utilization of absentee voting by mail increases all across the state, WEC staff will work with clerks to identify which method to process absentee ballot requests, ballot records, and absentee address labels is best in managing high volumes of absentees and then popularize and train clerk staff on this method.

Staff intends to implement additional tracing procedures and tools to enable early detection of issues such as the batch that restarted in Milwaukee. This will give technical staff greater insight into the internal processes of WisVote beyond what is presently visible in logs and reports and give near-real-time data on system performance in a more meaningful way. In addition, some tools under WEC evaluation can provide certainty that workflows and system processes are behaving as expected after system deployment and provide staff instant notifications if a change is detected.

In response to clerk and voter feedback, WEC staff is investigating numerous methods to improve the immediacy and accuracy of user feedback. In addition to increasing user satisfaction, improved feedback should reduce the number of incomplete absentee applications from voters and increase

confidence from both clerks and voters that requests are being correctly processed, and ballots are sent out timely.

Additionally, WEC staff will create reports to help clerks manage and audit absentee ballot requests and ballots coming into and leaving their office so that they identify issues, anomalies, and ensure all requests are successfully fulfilled and tracked. WEC staff hopes to provide clerk staff the tools to monitor their data so that they can identify and resolve issues. Maintaining and verifying data in the voter registration system database enables our critical role in providing accurate information to voters.

V. Conclusions

The April 7, 2020 election introduced countless challenges that Wisconsin clerks successfully overcame, enabling a record number of voters to cast their ballots through the absentee process. Moreover, the final election data conclusively indicates that the election did not produce an unusual number unreturned or rejected ballots. Despite the overwhelming success of absentee voting as a whole, the experiences leading up to election day were not trouble-free and illuminated several critical areas for improvement. The absentee voting process in Wisconsin can be complex for some users and the current system favor the technically savvy. Voters and clerks would benefit from more information about the status of their absentee ballots, particularly once they enter the mail system. Finally, clerks and WEC staff need more powerful but easy-to-use tools that will enable them to quickly identify and correct problems. The 2020 CARES Act affords Wisconsin the necessary resources to implement many of these improvements, but long-term sustainment will require additional support. With adequate backing, the challenges of April 2020 should ultimately yield voters, clerks, and WEC staff a much-improved absentee voting process.

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Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Democratic National
Committee and Democratic
Party of Wisconsin,
Plaintiffs,
V. Case No. 3:20-cv-249-wmc
Marge Bostlemann, et al., (consolidated with Case
Defendants, Nos. 3:20-cv-278-wmc and
and 3:20-cv-248-wmc)
Republican National
Committee, et al.,

Intervenor-Defendants.

DEPOSITION OF WISCONSIN ELECTION
COMMISSION BY:
MEAGAN WOLFE 30(b)(6) Witness
Zoom Recorded Videoconference
07/03/2020
10:08 a.m. (EST)

REPORTED BY: AMANDA GORRONO, CLR
CLR NO. 052005-01

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

Page 2

1 07/03/2020
2 10:08 a.m.
3
4 DEPOSITION OF WISCONSIN ELECTION COMMISSION by
5 MEAGAN WOLFE, 30(b)(6) witness, held virtually via
6 Zoom Videoconferencing, before Amanda Gorrone, CLR,
7 and Notary Public of the State of New York.
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Page 3

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1 A P P E A R A N C E S (CON'T.)

2

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15

16 ALSO PRESENT:

17 Commissioner Robert F. Spindell, Jr. - Wisconsin

18 Elections Commission

19

20 Henry Marte - Videographer/Legal Tech

21

22

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1 ----- E X H I B I T S, CON'T -----

2 Wolfe PAGE

3 Wolfe Exhibit 6

4 04/03/20 7th Circuit Court of Appeals

5 Order..... 33

6

7 Exhibit 7

8 4/18/20 Commission Meeting Summary..... 67

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10 Wolfe Exhibit 8

11 05/15/20 WEC Report on April 2020

12 Absentee Voting..... 78

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14 Wolfe Exhibit 9

15 06/25/20 WEC Defendants' Status Report.. 102

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17 Wolfe Exhibit 13

18 WEC Response to DNC Plaintiffs' First

19 Set of Interrogatories..... 113

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21 Gear Plaintiffs' Exhibit 4

22 MyVote Wisconsin Manual..... 130

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24 Gear Plaintiffs' Exhibit 7

25 EL-121 Absentee Ballot Application

26 Form..... 134

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28 Wolfe Exhibit 18

29 03/19/20 Letter..... 189

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1 ----- I N D E X -----

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3 WITNESS EXAMINATION BY PAGE

4 MEAGAN WOLFE, MR. DEVANEY..... 8, 189

5 MR. SHERMAN..... 125

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7 ----- E X H I B I T S -----

8 Wolfe PAGE

9 Wolfe Exhibit 1

10 Notice of Rule 30(b)(6) Deposition of

11 Wisconsin Elections Commission..... 9

12

13 Wolfe Exhibit 2

14 Subpoena to WEC for 30(b)(6)

15 Deposition..... 9

16

17 Wolfe Exhibit 3

18 3/3/20 Order from Judge Conley..... 13

19

20 Wolfe Exhibit 4

21 4/02/20 Order in Response to

22 Plaintiffs' Motion for a Preliminary

Injunction (Case 3:20-cv-00249)..... 29

30

31 Wolfe Exhibit 5

32 04/02/20 Order re Motion for

Preliminary Injunction (Case

3:20-cv-00249)..... 32

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1 THE VIDEOGRAPHER: Okay. We are now

2 on the record. My name is Henry Marte. I am a

3 videographer on behalf of Digital Evidence Group.

4 Today's date is July 3rd, 2020, and the time is

5 10:08 a.m. This deposition is being held via remote

6 Zoom in the matter of the Democratic National

7 Committee versus Marge Bostlemann, et al. The

8 deponent today is Meagan Wolfe. All parties are

9 noted on the stenographic record.

10 Will the court reporter please

11 administer the oath to the witness.

12

13 M E A G A N W O L F E,

14 called as a witness, having been first duly sworn by

15 a Notary Public of the State of New York, was

16 examined and testified as follows:

17

18 EXAMINATION

19 BY MR. DEVANEY:

20 Q. Good morning, Ms. Wolfe. John

21 Devaney.

22 A. Morning,

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1 Q. Good to see you again. First thank
 2 you for allowing to us take your deposition on this
 3 national holiday. We -- I know it's an imposition.
 4 I appreciate you taking the time. Could you state
 5 your full name for the record.
 6 A. Meagan Wolfe, M-e-a-g-a-n, W-o-l-f-e.
 7 Q. Okay. And I'm going to ask you to
 8 take a look at Exhibits 1 and 2, which are the
 9 Deposition Notice to the Wisconsin Election
 10 Commission, and then also a Subpoena for testimony.
 11 (Whereupon, Wolfe Exhibit 1, Notice
 12 of Rule 30(b)(6) Deposition of Wisconsin Elections
 13 Commission, was marked for identification.)
 14 (Whereupon, Wolfe Exhibit 2, Subpoena
 15 to WEC for 30(b)(6) Deposition, was marked for
 16 identification.)
 17 Q. And my question for you is: Are you
 18 appearing today pursuant to both this Notice of
 19 Deposition and the Subpoena for Testimony?
 20 A. Yes, I am.
 21 Q. And are you the designated
 22 representative for the Wisconsin Elections Commission

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1 in today's deposition?
 2 A. Yes, I am.
 3 Q. And so you are speaking on behalf of
 4 the Commission; is that correct?
 5 A. That's correct.
 6 Q. Ms. Wolfe, could you just briefly
 7 describe for us your education and employment
 8 backgrounds, starting with employment after your --
 9 after you graduated from your last school.
 10 A. Sure. So, I've worked with the State
 11 of Wisconsin Elections -- or Elections Commission or
 12 its predecessor agencies since 2011, and prior to
 13 that, I worked as a paralegal in a couple of law
 14 firms, and I also worked on doing some trademark and
 15 intellectual property work with a company before
 16 that.
 17 I have a degree in legal studies and
 18 English writing, Bachelors degrees.
 19 Q. Where is your degree from?
 20 A. The University of
 21 Wisconsin-Whitewater.
 22 Q. And the positions you've held with

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1 the Commission, could you just walk us through those?
 2 A. Sure. So when I first started, I was
 3 doing our voter outreach. So I worked with voters,
 4 putting together programs, initiatives, going around
 5 and talking to voter groups, to legislators, to
 6 whomever would listen about implementation of voter
 7 laws. From there I moved into sort of a project
 8 management role, working on agency technology,
 9 overseeing the development of the My Vote Wisconsin
 10 website, and then from there I was appointed the
 11 deputy administrator where I oversaw the IT teams.
 12 And then in 2018, I was appointed the administrator,
 13 and then in 2019, I was confirmed in that position by
 14 a State Senate.
 15 Q. That you for that summary. What is
 16 the mission of the Wisconsin Elections Commission?
 17 A. To implement the election laws of the
 18 state.
 19 Q. Is it also to maximize the number of
 20 Wisconsinites who are able to vote and participate in
 21 the democratic process?
 22 A. Yes, I -- I would say, you know, our

Page 12

1 main goal, our -- our not even goal, but our
 2 statutory duty is to implement the laws of the state
 3 as they pertain to election.
 4 Q. Okay. Do -- do you also agree the
 5 mission is what I asked before, which is to maximize
 6 the number of Wisconsinites who can vote and
 7 participate in the democratic process?
 8 A. Yes.
 9 Q. Before I get into a document, I
 10 should have started by asking if you've been deposed
 11 before.
 12 A. I have been deposed before.
 13 Q. And so you know the rules. And I'll
 14 just briefly ask that you allow me to complete my
 15 questions before you answer. I think we're already
 16 off to a good rhythm in that regard, and if I ask you
 17 something that you don't understand, please ask me to
 18 rephrase it. And if you need a break, please, let me
 19 know that. Okay?
 20 A. Okay. Okay.
 21 Q. Thank you.
 22 MR. DEVANEY: If I could ask Henry to

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1 please pull up Exhibit 3.
 2 THE TECH: (Complying.)
 3 (Whereupon, Wolfe Exhibit 3, 3/3/20
 4 Order from Judge Conley, was marked for
 5 identification.)
 6 BY MR. DEVANEY:
 7 Q. Exhibit 3, Ms. Wolfe, is an opinion
 8 and order from Federal Judge Conley, that you
 9 probably recall from when we were together back in --
 10 in March and April, and this was his order on an
 11 application for a temporary restraining order, and I
 12 really have it here for reference, in case you want
 13 to refer to it, as I ask you some limited questions
 14 about this.
 15 Do you recall that in this order,
 16 Judge Conley extended the period for registering
 17 electronically from March 18th to March 30th?
 18 A. Yes.
 19 Q. And based on interrogatory responses
 20 the Commission provided last night, my understanding
 21 is that because of that extension, an additional
 22 57,187 people were permitted to --

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1 A. I'm sorry.
 2 Q. Yeah, I know.
 3 A. I am having a hard time hearing you.
 4 MR. DEVANEY: Could whoever's phone
 5 is ringing, please go on mute?
 6 THE WITNESS: I think it's
 7 Commissioner Spindell.
 8 THE VIDEOGRAPHER: Actually, if I
 9 could ask anyone that's not going to be verbalizing
 10 themselves or logging an objection, if they could
 11 please put themselves on mute. That's going to help
 12 the whole process.
 13 BY MR. DEVANEY:
 14 Q. Okay. I'll try that again, Ms.
 15 Wolfe.
 16 A. Okay.
 17 Q. My question is: I think we
 18 established you recall the online registration period
 19 was extended by Judge Conley from March 18th to March
 20 30th, correct?
 21 A. Yes, that's correct.
 22 Q. And based on interrogatory answers

Page 15

1 the Commission provided last night, my understanding
 2 is that, that extension allowed an additional 57,187
 3 people to register to vote, and participate in the
 4 April 7th election; is that correct?
 5 A. To register to vote, that information
 6 was not compared with participation information.
 7 Q. Good -- good correction. And would
 8 you agree that, but for that extension, those 57,187
 9 people would not have been permitted to vote in the
 10 election?
 11 A. Again, it's not related to voting in
 12 the election. It was registrations.
 13 Q. But they -- without --
 14 A. I don't know if they participated.
 15 Q. Right. But without the extension,
 16 they would not have had the opportunity to vote in
 17 the election -- in the election; is that correct?
 18 A. No, not necessarily. They could have
 19 potentially registered to vote on election day, at
 20 the polls or in person at their clerk's office so --
 21 Q. Okay.
 22 A. -- I can't -- I can't speak to that.

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1 Q. That -- that's a fair point. You --
 2 during the -- that period of time, would you agree
 3 that the COVID epidemic was a significant issue for
 4 the Commission and for election officials?
 5 A. Yes.
 6 Q. And it was also a significant issue
 7 for voters, correct?
 8 A. Yes.
 9 Q. And would you agree that, of the
 10 57,187, a significant percentage of them were allowed
 11 to participate, simply because of that extension of
 12 the time to register?
 13 A. Again I apologize, but I can't speak
 14 to participation on that. I -- that would be
 15 speculation.
 16 Q. Okay. Let me ask you this: In
 17 implementing that extension of the registration
 18 period, what did the Commission have to do?
 19 A. A number of things. I think one of
 20 the most significant undertakings would have been to
 21 update the online voter registration portal, things
 22 like the deadlines and how they correspond with the

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<p style="text-align: right;">Page 17</p> <p>1 statewide database in creating record are -- are very 2 complex with a lot of security measures and testing 3 that has to happen. And so we had to update our 4 systems and all the subsequent technological 5 workflows to be able to accommodate that time period, 6 which also required round-the-clock actual staff 7 members watching it to make sure that it was 8 operating correctly. Because again, it had been 9 asked to do something that it wasn't hard coded to 10 do. So that was a significant undertaking, in 11 addition to letting the public know and, of course, 12 the clerks know and providing training to them about 13 how they would continue to see voter registrations, 14 beyond the statutory time frame. And how that would 15 impact things like ensuring that those voters 16 appeared on the poll books because some jurisdictions 17 do start printing their poll books right after the 18 close of registration. So training was a significant 19 piece of it, as well.</p> <p>20 Q. How long did it take for the 21 Commission to make the necessary hardware and other 22 technology changes to allow for the extension?</p>	<p style="text-align: right;">Page 19</p> <p>1 A. If my memory serves me, I believe 2 that's correct.</p> <p>3 Q. Okay. With respect to -- and the 4 other way to register, of course, is -- in addition 5 to in person and online, is by mail; is that right?</p> <p>6 A. Yes, that's correct.</p> <p>7 Q. Okay. And if Judge Conley had 8 extended the period for mail-in registration, which 9 he did not, but if he had, what steps would the 10 Commission would had to have taken to implement that?</p> <p>11 A. Largely, I believe that would have 12 been training and education of both clerks and 13 voters, so they understood how to utilize that 14 option. One of the things that we discussed, as a 15 potential impact of that change, would be the amount 16 of time the mail takes to make that transaction with 17 the -- between the voter and the clerk. And so 18 educating voters and clerks about those steps to make 19 sure that they were successful.</p> <p>20 Q. Beyond educating voters and clerks 21 about a possible extension for online -- sorry, for 22 mail registration, is there anything else the</p>
<p style="text-align: right;">Page 18</p> <p>1 A. I'm not 100 percent sure what that 2 timeline looked like. There were so many things 3 being implemented at that same time, and we work at a 4 breakneck pace throughout that so I -- I'm not sure 5 how long it took us for that particular change.</p> <p>6 Q. It was a matter of a few days, 7 though; is that correct?</p> <p>8 A. Most likely, I'm sure it had to be, 9 yes.</p> <p>10 Q. Okay. And then also the Commission 11 had to restart the online registration process, which 12 had been shutdown, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And how long did that take, do you 15 recall?</p> <p>16 A. I'm sorry, I don't recall 17 specifically, but I'm sure it was a matter of days.</p> <p>18 Q. Okay. So from the time that Judge 19 Conley issued his order, was it approximately two or 20 three days until the Commission completed what it had 21 to do to allow for the extension of online 22 registration?</p>	<p style="text-align: right;">Page 20</p> <p>1 Commission would have to do to implement such an 2 extension?</p> <p>3 A. Yes, there would also have to be 4 changes like we discussed to the back-end workloads 5 and the statewide database. There are very specific 6 hard-coded opportunities for each of our 2,000, you 7 know, local election officials to enter voter 8 registration. And depending on the time frame, it 9 populates our workflows that push it to the poll 10 books, that code it as an in-person registration 11 versus a by mail versus an election day registration, 12 which have, you know, some important distinctions, 13 when it comes to reporting and other things. So yes, 14 there would have to be changes to those workflows, as 15 well.</p> <p>16 Q. Is that a hardware change?</p> <p>17 A. It is a software change.</p> <p>18 Q. Software change. And approximately 19 how long would that take to implement?</p> <p>20 A. It -- probably in the same line of 21 how long it took for the My Vote changes, a matter of 22 days, most likely. But it would also -- like My Vote</p>

5 (Pages 17 to 20)

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1 changes, I don't mean to simplify them. Just because
 2 we can work very, very quickly, doesn't mean that
 3 it's comfortable. There's a lot of testing and
 4 monitoring that has to happen, when you make those
 5 changes in a rush.
 6 Q. Right. And obviously it was a very
 7 compressed time frame back then, as we all know. If
 8 the Commission had the luxury of weeks instead of
 9 days, I take it that the changes that you've
 10 described would be easier to implement?
 11 A. Easier, no. Less risky because of
 12 additional testing, yes.
 13 Q. Fair enough. All right. To change
 14 the topic and ask about -- by the way, I'm sorry, let
 15 me just go back.
 16 The 57,000-plus people who were
 17 allowed to register, because of the extension of the
 18 online registration deadline, would you say that that
 19 result was consistent with the Commission's mission
 20 of allowing as many Wisconsinites to vote as
 21 possible?
 22 A. I -- again, I'm -- our job is simply

Page 22

1 to implement the law. So I -- I'm not sure.
 2 Q. Well, changing topics, are you --
 3 have you been tracking the unfortunate progress of
 4 the COVID epidemic in Wisconsin and elsewhere?
 5 A. Somewhat, yes.
 6 Q. Are you aware that, over the last
 7 month, there has -- there have been approximately
 8 11,000 new cases reported in Wisconsin?
 9 A. I wasn't aware of that specific
 10 number.
 11 Q. Okay. Does -- do you or others at
 12 the Commission track the trajectory of the COVID-19
 13 virus, as part of your planning for upcoming 2020
 14 elections?
 15 A. We do not. As election officials and
 16 also a very small agency, we work with our partners
 17 through the State Emergency Operation Center and, you
 18 know, and the Department of Health Services and
 19 others to rely on their medical expertise.
 20 Q. Do you meet them -- sorry -- do you
 21 meet with them or otherwise communicate with them
 22 periodically so that you understand the trajectory of

Page 23

1 the disease?
 2 A. Not specifically to understand the
 3 trajectory, but through the State Emergency Operation
 4 Center, they have a ticket process, so they're aware
 5 that elections is one of the sectors or agencies that
 6 they have to consider, and keep in the loop about our
 7 information.
 8 Q. And would you agree that the increase
 9 in COVID cases over the last month increases the risk
 10 of contamination among Wisconsin residents and voters
 11 who participate in the upcoming elections?
 12 MR. GAHNZ: Object to the form, calls
 13 for speculation.
 14 Q. You can answer.
 15 MR. GAHNZ: Well, let me place the
 16 objection, please. In addition, it may call for
 17 expert opinion beyond the scope of this witness. You
 18 may answer.
 19 A. I'm sorry. I don't have the
 20 expertise to answer that.
 21 Q. Ms. Wolfe, does -- does the
 22 Commission agree that the increased risk of

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1 contamination from the virus should be factored into
 2 planning for the August and November elections?
 3 A. That is not something the Commission
 4 has taken a position on. But again, we rely on our
 5 other partners with medical expertise, to help advise
 6 us on measures that need to be taken.
 7 Q. So just to be clear, at this point
 8 the Commission has no position on whether the
 9 trajectory of the COVID virus should be factored into
 10 planning for the August and November elections; is
 11 that correct?
 12 A. When I say "the Commission," I mean
 13 the Commission, as a body. It's not a motion that
 14 they've taken, your -- your question. So they
 15 haven't formally adopted it.
 16 Q. Has there been discussion of that
 17 topic?
 18 A. Yes.
 19 Q. Can you describe what discussions
 20 you're aware of relating to how the COVID virus
 21 trajectory should taken into account for planning for
 22 the upcoming elections?

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1 A. Sure. All of our meetings are public
 2 meetings, and the transcripts and videos of those --
 3 as well as the minutes would be available. But I
 4 don't think I would be in a position to try to
 5 summarize the 20 meetings that they've had and the
 6 discussion over the course of the beginning of this
 7 year.
 8 Q. Well, let me ask you this: Does the
 9 Commission agree it's necessary to conduct the
 10 elections in August and November in a way that
 11 minimizes the risks of cross-contamination among
 12 voters and poll workers?
 13 A. Again, they have not adopted a formal
 14 motion along those lines.
 15 Q. Well, let me ask you, as a
 16 representative of the Commission: Do you agree with
 17 what I just said?
 18 A. Could you repeat it, please?
 19 Q. Sure. Do you agree that it's
 20 necessary to conduct the elections in August and
 21 November in a way that minimizes the risks of
 22 cross-contamination among voters and poll workers?

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1 MR. GAHNZ: I'll going to lodge an
 2 objection here. Ms. Wolfe is being presented today
 3 as the representative of the Commission. Her
 4 individual views are not relevant.
 5 Q. You can answer that, Ms. Wolfe.
 6 A. I don't think I can speak for the
 7 Commission on that. They haven't taken a stance.
 8 They haven't moved on that particular issue.
 9 Q. And you're not willing to state your
 10 own view on that issue?
 11 A. I don't feel that that would be
 12 appropriate.
 13 Q. Has the Commission taken a position
 14 on whether voting by -- absentee voting by mail
 15 should be encouraged for the November election?
 16 A. They have not taken a motion on that.
 17 They have adopted to send a mailer to all voters that
 18 do not have an absentee request yet on file for the
 19 August or November election, and to inform them of
 20 their statutory options to cast a ballot, including
 21 by mail absentee. And the mailer also includes a
 22 absentee ballot request form that the voter can

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1 complete and return.
 2 Q. What is the purpose of providing that
 3 mailer?
 4 A. In terms of the Commission's intent,
 5 that they relayed, in as far as direction to staff,
 6 has been to provide voters with information on their
 7 options to cast a ballot, including absentee by mail.
 8 Q. Ms. Wolfe, has the Commission
 9 developed any forecasts of the volume of mailed
 10 ballots that it expects for the November election?
 11 That is, people voting by mail?
 12 A. It's difficult to forecast because
 13 the pattern, or the voter behavior, was very
 14 different in April than we've seen in previous
 15 elections. But we can utilize April as somewhat of a
 16 model for potential percentages for turnout, and use
 17 that as sort of the -- a potential guide.
 18 But I think any planning that we're
 19 doing has to recognize that we may see numbers that
 20 are different than April. So we need to plan for
 21 more or less in terms of participation by mail and/or
 22 in person.

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1 Q. What percentage of voters voted by
 2 mail in April?
 3 A. The exact percentages reflected in
 4 our absentee report, that we provided put it as over
 5 60 percent.
 6 Q. Okay. And how many, if I recall
 7 correctly, the total number of voters who voted
 8 absentee was approximately 75 or 80 percent; is that
 9 correct?
 10 A. I believe so. It's also reflected in
 11 that report, but I believe that's correct.
 12 Q. Okay. And we will get to the report,
 13 but I just want to ask you a couple background
 14 questions relating to it.
 15 And I remember in one of the reports
 16 that the projection for the number of absentee
 17 ballots for the November election was 1.8 million or
 18 more. Does that ring a bell with you?
 19 A. It doesn't, but I -- I don't recall a
 20 portion where we made a projection, but that may be
 21 the case. I'd have to look at it.
 22 Q. Okay. And is there a projection that

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1 the Commission currently has, for the November
 2 election, of number of absentee ballots?
 3 A. We do not. Again, it is operating
 4 under you know, April was a new pattern and -- as was
 5 the May special election -- a new pattern of voter
 6 interaction with how they cast their ballots that we
 7 can use somewhat as a guide, but recognizing that the
 8 conditions may be different in April and November.
 9 And so we have to have a very flexible approach to
 10 our plan, because there is no way to really predict
 11 accurately.
 12 Q. Okay.
 13 MR. DEVANEY: Henry, could you please
 14 pull up Exhibit 4?
 15 THE TECH: (Complying.)
 16 (Whereupon, Wolfe Exhibit 4, 4/02/20
 17 Order in Response to Plaintiffs' Motion for a
 18 Preliminary Injunction (Case 3:20-cv-00249), was
 19 marked for identification.)
 20 BY MR. DEVANEY:
 21 Q. Ms. Wolfe, this Exhibit 4 is
 22 Judge Conley's order in response to Plaintiffs'

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1 Motion For a Preliminary Injunction that was issued
 2 on or about, I guess, April 2.
 3 Are you familiar, generally, with
 4 this order?
 5 A. Yes, I am.
 6 Q. And I just have a few questions for
 7 you about it. And I'm putting it here mostly for
 8 reference, I may at some point refer to some of the
 9 language in the order.
 10 Do you recall that, in the order,
 11 Judge Conley set forth an exception for the witness
 12 certification requirement for voters who provided a
 13 description of why they are unable to obtain a
 14 witness certification?
 15 A. Yes.
 16 Q. And do you know how many ballots were
 17 submitted with the type of explanation contemplated
 18 in Judge Conley's order?
 19 A. I -- I do not know without seeing the
 20 number. I know that we have the data, I just do not
 21 have it in front of me.
 22 Q. Okay. Whatever that number is, is it

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1 correct that all of those voters' ballots were
 2 rejected?
 3 A. If they did not receive a replacement
 4 ballot, depending on the timing, if that was an
 5 option for them, then those ballots were not counted,
 6 if -- if they sent it back with the affirmation
 7 instead of a witness signature.
 8 Q. And has the Commission analyzed the
 9 demographic makeup of those voters whose ballots were
 10 rejected for lack of a witness certification?
 11 A. There's no demographic information in
 12 the statewide voter registration database, so we do
 13 not have that information.
 14 Q. Okay. Ms. Wolfe, do you agree that,
 15 given the current state of the coronavirus, that it
 16 remains, it continues to be a risk, for
 17 immunocompromised individuals to enact -- interact
 18 with others to obtain witness signatures?
 19 MR. GAHNZ: I'm going to object in
 20 terms of competence of the witness.
 21 Q. You can answer.
 22 A. I do not have expertise to answer

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1 that. I'd have to rely on someone that does.
 2 Q. Have you consulted or has the
 3 Commission consulted with medical experts or anyone
 4 else to assess the vulnerability in this current
 5 environment of immunocompromised voters?
 6 A. Not specifically, no.
 7 Q. Ms. Wolfe, are you familiar with the
 8 7th Circuit's -- 7th Circuit Court of Appeals
 9 decision that affirmed in part and reversed in part
 10 Judge Conley's preliminary injunction order?
 11 A. Yes, I am.
 12 Q. And we have that as an exhibit -- and
 13 actually, why -- why don't we pull it up, just in
 14 case you want to refer to it?
 15 MR. DEVANEY: Henry, I think that's
 16 Exhibit 5.
 17 THE TECH: (Complying.)
 18 (Whereupon, Wolfe Exhibit 5, 04/02/20
 19 Order re Motion for Preliminary Injunction (Case
 20 3:20-cv-00249), was marked for identification.)
 21 MR. DEVANEY: Is that Exhibit 5 in
 22 front -- sorry, maybe it's Exhibit 6.

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1 THE TECH: (Complying.)
 2 (Whereupon, Wolfe Exhibit 6, 04/03/20
 3 7th Circuit Court of Appeals Order, was marked for
 4 identification.)
 5 MR. DEVANEY: There we go.
 6 BY MR. DEVANEY:
 7 Q. Now, in -- in the 7th Circuit's
 8 order, the Court suggested that the -- the Commission
 9 could consider other ways for voters to satisfy the
 10 witness certification requirement, such as by not
 11 requiring the witness's physical signature. Do you
 12 recall that?
 13 A. I apologize, I don't. I -- we have
 14 been still analyzing the decision and taking the most
 15 imminent measures. We haven't gotten quite to
 16 that -- that discussion yet.
 17 Q. Well, just to be clear, this is the
 18 decision that was issued in April 3.
 19 A. Oh, I'm sorry, I'm sorry.
 20 Q. Right.
 21 A. Thank you. Yes, I am familiar, then.
 22 Thank you. The new one on my mind.

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1 Q. I understand, totally.
 2 So my -- my question, and we can look
 3 at the document if you need to, but in -- in this
 4 order, the 7th Circuit suggested the Commission could
 5 consider other ways for voters to satisfy the witness
 6 requirement, such as by not requiring a witness's
 7 physical signature. Do you recall that?
 8 A. Vaguely, yes.
 9 Q. Would you like to see it, just so --
 10 A. I would, thank you.
 11 MR. DEVANEY: Henry, could you go
 12 to -- I think it's Page 3 of this document?
 13 THE TECH: (Complying.)
 14 MR. DEVANEY: Sorry, if you go back
 15 to Page 2. And now, I'm really going to make you
 16 work by asking to you go to Page 4.
 17 BY MR. DEVANEY:
 18 Q. And if you can see, sort of midway
 19 down the page, there is a statement from the
 20 7th Circuit that I'm having trouble reading because
 21 my screen is blocking the document, but --
 22 MR. DEVANEY: Henry, maybe you could

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1 move that a little --
 2 THE TECH: (Complying.)
 3 MR. DEVANEY: There, that's -- thank
 4 you. That's great.
 5 BY MR. DEVANEY:
 6 Q. And I'm paraphrasing slightly, the
 7 Court says they have every reason to believe that the
 8 Commission "will continue to consider yet other ways
 9 for voters to satisfy the statutory signature
 10 requirement (if possible, for example, by maintaining
 11 the statutory presence requirements but not requiring
 12 the witness's physical signature)."
 13 Do you see that?
 14 A. Yes.
 15 Q. In -- in response to the
 16 7th Circuit's order, has the Commission considered
 17 other alternatives such as those referred to here by
 18 the 7th Circuit?
 19 A. In development of the guidance that
 20 is referenced there, there are some alternatives that
 21 have been suggested. We have not, the Commission has
 22 not, considered any other alternatives beyond what is

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1 in the guidance that's referenced here, at this
 2 point, at this point.
 3 Q. What are the other alternatives that
 4 have been suggested?
 5 A. The alternatives included things like
 6 allowing a voter to perhaps have the witness sign
 7 over video chats and other options for them to have
 8 their ballot witnessed without having physical
 9 contact with the witness.
 10 Q. Has the Commission --
 11 (Simultaneous speakers.)
 12 Q. Has the Commission approved any of
 13 those -- formally approved any alternatives of the
 14 type you just described?
 15 A. The Commission adopted the guidance
 16 that is referenced here, but they have not considered
 17 any additional alternatives as part of the planning
 18 for the fall.
 19 Q. Does the Commission plan to do that
 20 to your knowledge?
 21 A. We will be working to update all of
 22 our public health guidance and adding any other

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1 public health guidance that's needed. So, yes, this
 2 would be on a list of things that they will consider
 3 before the fall.
 4 Q. When do you anticipate that will be
 5 taken up and considered?
 6 A. Their next regularly scheduled
 7 meeting is September 1, so I would say probably on
 8 that date or at a meeting before then.
 9 Q. Focusing on the 7th Circuit's
 10 language that says, "If possible, for example, by
 11 maintaining the statutory presence requirement but
 12 not requiring the witness's physical signature," do
 13 you see that?
 14 A. Yes.
 15 Q. Is that an alternative that the
 16 Commission has discussed?
 17 A. That is not an alternative that
 18 they've discussed at this point.
 19 Q. Do you anticipate that will be an
 20 alternative the Commission will take up?
 21 A. I anticipate that is a discussion
 22 we'll have as part of updating our -- our public

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1 health guidance heading into the fall.
 2 Q. And have you considered ways that
 3 this could be possible, of requiring -- having
 4 signature but without -- sorry, not requiring the
 5 witness's physical signature?
 6 A. We have not formalized any thoughts
 7 along those lines yet.
 8 Q. Okay. Are there any documents that
 9 show discussion of that issue within the Commission?
 10 A. I do not believe so, not that I'm
 11 aware of.
 12 Q. Okay. Ms. Wolfe --
 13 MR. DEVANEY: Sorry, Henry, if we can
 14 go back to -- I believe it was Exhibit 4, which was
 15 Judge Conley's preliminary injunction order.
 16 THE TECH: (Complying.)
 17 BY MR. DEVANEY:
 18 Q. And again, Ms. Wolfe, I have this
 19 here mostly for reference. If you need to refer at
 20 any point to the order in response to my questions, I
 21 certainly want you to have that opportunity.
 22 You -- you'll recall, I believe, that

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1 the issue of providing photo ID and proof of
 2 residence for registering and requesting absentee
 3 ballots was addressed by Judge Conley, correct?
 4 A. I don't remember how specifically;
 5 but, yes, I believe that was addressed.
 6 Q. Okay. And what I want to ask you
 7 about in connection with that is: Is there an
 8 exception to one or both of that requirements for
 9 people who are in -- indefinitely confined?
 10 A. Under current statute, there is an
 11 exemption from photo ID for indefinitely confined
 12 voters, yes.
 13 Q. And is that exception just for photo
 14 ID and not for the residence, proof of residence?
 15 A. That's correct.
 16 Q. Okay. Does the Commission have any
 17 data to show how many voters reported that they were
 18 indefinitely confined and had that status for the
 19 April 7 election?
 20 A. Yes, we do.
 21 Q. Do you know that -- that number by
 22 any chance, off the top of your head?

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1 A. I -- I'm sorry, I do not. I know we
 2 presented it as part of the absentee report, but I do
 3 not know.
 4 Q. Okay. When you said "the absentee
 5 report," which report is that?
 6 A. That would be the report that we
 7 submitted to the Commission following the election,
 8 titled the April 7, 2020, absentee voting report.
 9 Q. Okay. Thank you.
 10 And what guidance has the Commission
 11 provided on the meaning of indefinitely confined?
 12 A. There is a great deal of guidance,
 13 since the -- since the implementation of the photo ID
 14 law, we have put out documentation, public
 15 information, discussing the exemption for
 16 indefinitely confined voters, so it's part of our
 17 documentation where we discuss photo ID.
 18 So we have our bringit.wi.gov website
 19 that talks about photo ID, and I know there's number
 20 of documents, videos and things there, and it also is
 21 incorporated throughout all of our guidance and
 22 forms, where photo ID is referenced.

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1 Q. Under Commission's guidance is it
 2 correct that a person who is immunocompromised and
 3 susceptible to infection from COVID -- could such a
 4 person be deemed indefinitely confined?
 5 A. Indefinitely confined is a
 6 self-certification of the voter. So the voter has to
 7 choose and then certify if they qualify under the
 8 terms of the law. So that would be for the voter to
 9 decide if they met the statutory requirement.
 10 Q. If a voter believed that he or she
 11 was susceptible to infection from COVID and declared
 12 that he or she was indefinitely confined, would that
 13 be consistent with the Commission's guidance?
 14 A. We do not index or qualify any
 15 conditions. The law says that if, for reason of age,
 16 illness, infirmity or disability the voter certifies
 17 that they are indefinitely confined, then they --
 18 they qualify. So it would be for the voter to
 19 determine whether or not that applied to them, and
 20 they were able to lawfully certify.
 21 Q. Has the Commission issued any
 22 guidelines or other statements to the public about

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1 whether susceptibility to infection from COVID
 2 constitutes being indefinitely confined?
 3 A. I do not believe we have put anything
 4 out specifically identifying COVID, because again we
 5 don't index conditions, as -- as ones that qualify or
 6 do not, it's just generally that's what the statute
 7 says, and it's for the voter to determine whether or
 8 not their condition qualifies.
 9 Q. Does the Commission have any plans to
 10 clarify for the public whether -- about concerns
 11 about COVID infection can give rise to an
 12 indefinitely confined status of a voter?
 13 A. They are not currently any plans for
 14 that specific discussion. I believe the Commission
 15 may have taken a position on that at some point.
 16 I -- I'm sorry, I don't remember when.
 17 Q. Okay. Have you been involved in any
 18 discussions about whether the Commission should issue
 19 such guidance to the public?
 20 A. It may have been a topic of
 21 conversation at a Commission meeting around the
 22 April 7 election, but, again, I'm sorry, I don't

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1 remember specifically. There were a lot of meetings.
 2 Q. Okay.
 3 MR. DEVANEY: Henry can you go to
 4 pages -- Page 16 of Exhibit 4.
 5 THE TECH: (Complying.)
 6 MR. DEVANEY: And if you'd move it a
 7 little bit to the left.
 8 THE TECH: (Complying.) Sorry, I
 9 dropped my headphones there. What did you say?
 10 MR. DEVANEY: If you can move the
 11 document a little bit to the left, please.
 12 THE TECH: Sure. (Complying.)
 13 BY MR. DEVANEY:
 14 Q. Ms. Wolfe, obviously take your time
 15 to read this, but I'm going to be focusing on the
 16 bottom of Page 16 paragraph that begins with, "In
 17 response to WEC-issued guidance for indefinitely
 18 confined electors on March 29, 2020, which provides
 19 in pertinent part," and then if could you just read
 20 that language.
 21 MR. DEVANEY: And, Henry, if you
 22 could, after Ms. Wolfe has a chance to read it, carry

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1 over to Page 17.
 2 A. Sure. So, after what you have
 3 highlighted it says, "Designation of" --
 4 BY MR. DEVANEY:
 5 Q. Sorry, I'm sorry. I just meant read
 6 it to yourself --
 7 A. Oh.
 8 Q. -- so that you can -- I just want to
 9 make sure that you have it in -- in mind.
 10 MR. DEVANEY: And, Henry, if you
 11 could go to Page 17 so Ms. Wolfe can continue
 12 reading.
 13 THE TECH: (Complying.)
 14 BY MR. DEVANEY:
 15 Q. And is this language that's currently
 16 in effect from the Commission in defining what it
 17 means to be indefinitely confined?
 18 A. I believe so. I believe this is
 19 still the prevailing guidance. Again, I apologize,
 20 there are so many documents we created and updated
 21 and changed, but I believe this is.
 22 Q. Okay. And do you know if the

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1 Commission has any plans to change this language for
 2 the November election?
 3 A. It is not currently something that is
 4 scheduled for discussion.
 5 Q. Okay.
 6 MR. DEVANEY: Okay. Henry, you can
 7 keep that Exhibit up but go back to Page 1, please.
 8 THE TECH: (Complying.)
 9 BY MR. DEVANEY:
 10 Q. Ms. Wolfe, slightly changing topics,
 11 for the November general election, do you know what
 12 the dates are by which municipal boards are canvassed
 13 and must certify results to counties?
 14 A. I do not have that memorized yet, no,
 15 I -- I don't. I mean, I could find it, but I don't
 16 have it in front of me.
 17 Q. Now for the April election, that date
 18 was April -- the date was April 13 for municipalities
 19 to certify results; is that correct?
 20 A. Well, I -- I'm not sure, could you
 21 clarify your question a little bit, because
 22 certification of the results may mean something a

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1 little different to me. Do you mean count the
 2 ballots and produce the unofficial result sets?
 3 Q. Yeah, my -- my understanding is that
 4 municipalities certify results to counties; is that
 5 correct?
 6 A. Yes, yes.
 7 Q. And in the April election, the date
 8 for doing that was April 13?
 9 A. That was the date on which they
 10 produced their unofficial result sets, yes, and did
 11 their municipal report of canvass, yes.
 12 Q. And counties then certify results to
 13 the Commission, correct?
 14 A. That's correct. They certify them at
 15 the county level. They are then submitted to the
 16 state for our certification.
 17 Q. And in the April election, that took
 18 place on April 17, correct?
 19 A. That sounds right. I believe that's
 20 correct.
 21 Q. And then the Commission itself
 22 certified results on May 15; is that correct?

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1 A. I believe so, yes.
 2 Q. I have to take 30 seconds. I'll be
 3 right back.
 4 THE VIDEOGRAPHER: Do you want to go
 5 off the record or --
 6 MR. GAHNZ: Why don't we go off the
 7 record.
 8 THE VIDEOGRAPHER: Okay. One second.
 9 All right. The time is 10:56 a.m. Off the record.
 10 (Discussion held off the record.)
 11 THE VIDEOGRAPHER: All right. The
 12 time is 10:57 a.m. Back on the record.
 13 BY MR. DEVANEY:
 14 Q. Okay. So I just want to focus on the
 15 certification dates that we just talked about,
 16 April 13, 17 and May 15, and you'll recall that
 17 Judge Conley extended the deadline for receipt of
 18 absentee ballots from April 7 to April 13, correct?
 19 A. Yes.
 20 Q. And did that extension have any
 21 effect on the ability of municipalities, counties and
 22 the Commission to comply with the dates that we just

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1 went over?
 2 A. I -- I do not believe so, but I can't
 3 recall off the top of my head how the dates of
 4 certification related to the statutory dates. And if
 5 we saw any delays with municipalities getting things
 6 to the counties, but ultimately we -- we certified at
 7 the state level but our statutory deadline.
 8 Q. Okay. And you're not -- you don't
 9 recall right now any inability of municipalities or
 10 counties to meet their deadlines in that April
 11 election; is that correct?
 12 A. It was an extremely tight turnaround,
 13 and I know a lot of effort, incredible efforts went
 14 in on the part of the local election officials, but
 15 I -- I don't recall anyone not meeting their
 16 deadline.
 17 Q. And because of the extension of the
 18 deadline, it's correct that approximately 80,000
 19 ballots were counted that otherwise would have been
 20 rejected; is that right?
 21 A. The exact number, again, is reflected
 22 in our absentee voting reports, but that sounds like

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1 maybe a rounding up of what was in the report. But
 2 it is in that range, yes.

3 Q. And we will look at the report. It
 4 was 79,000-and-change. I'm just, for convenience,
 5 rounding up to 80,000.

6 And would you agree that all of those
 7 ballots would have been rejected and not counted but
 8 for Judge Conley's extension?

9 A. It is somewhat speculation. I -- you
 10 know, if the voters would have had a sooner deadline,
 11 we can't predict how their behavior may have changed
 12 based on the deadlines.

13 Q. But for those ballots that came in --
 14 those 79,000-and-change ballots arrived after the
 15 deadline, correct?

16 A. After the statutory deadline, yes.

17 Q. Right. And under strict application
 18 of the statutory deadline, all of those votes would
 19 have been rejected, correct?

20 A. Yes. Any ballot that arrived after
 21 8:00 p.m. on election day could not be counted.

22 Q. Now, with respect to the upcoming

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1 August and November elections, is the Commission
 2 working with the United States Postal Service to
 3 coordinate on mailings of election-related materials
 4 including ballots?

5 A. Yes.

6 Q. Can you describe what efforts the
 7 Commission has engaged in to coordinate with the
 8 USPS?

9 A. Sure. Some of the efforts include
 10 under -- mostly understanding the mailing system so
 11 we can relay information to our local election
 12 officials about how to work with their local
 13 branches. But at a larger level, we've been working
 14 again to understand their process and to also look at
 15 intelligent mail barcodes, and how we can incorporate
 16 that option into the absentee ballot process for
 17 local election officials who chose to use that
 18 system.

19 Q. And do you know, is the postal
 20 service providing any advice to voters or to the
 21 Commission itself on how long it should be expected
 22 for a ballot to be delivered in the mail?

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1 A. The guidance -- they've provided
 2 guidance over the years. And I know that we've
 3 always told voters that it could take up to a week to
 4 be returned. Ballots are first class mail. And
 5 again, I'm not a mail expert, but it's my
 6 understanding those should, in theory, take about two
 7 days. But they've always told us that we should
 8 advise voters that it may take up to seven days,
 9 especially if they are out of state.

10 Q. And is that -- is that the same
 11 advice for this year's upcoming elections, seven days
 12 should be assumed?

13 A. Well, we would continue to check in
 14 with them regularly to see if that guidance changes.
 15 But the last I heard, that was the guidance as of
 16 this time.

17 Q. And does that mean that when a
 18 clerk's office mails a ballot to a voter, one should
 19 assume that would take approximately seven days?

20 A. It may.

21 Q. And when the voter mails the ballot
 22 back, won't you assume that also will take seven

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1 days?

2 A. Yes, it may.

3 Q. Have you had any conversations -- you
 4 or others at the Commission -- with the US Postal
 5 Service about the resources they have available for
 6 the upcoming August and November elections including
 7 numbers of workers?

8 A. I have not been a part of
 9 conversations about their resources, no.

10 Q. Is that a discussion that you or
 11 others of the Commission intend to have in
 12 preparation for the upcoming elections?

13 A. In the context of understanding if
 14 they will have any delays or different guidance that
 15 impacts elections. I guess I wouldn't get into their
 16 internal resource planning, but we would, yes, be
 17 interested to know if there's going to be any changes
 18 to their expected timeline.

19 Q. And so far, you don't have any
 20 information of that sort; is that correct?

21 A. That's correct.

22 MR. DEVANEY: Sorry. Bear with me

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1 one moment here as I look at my notes.

2 Q. Ms. Wolfe, with respect to the

3 approximately 80,000 ballots that were counted

4 because of the extension of the receipt deadline,

5 does the Commission have any information on the

6 racial makeup of those voters?

7 A. No, we do not.

8 Q. Is that something that's available?

9 A. Not in the statewide database, no, it

10 is not.

11 Q. Is it available from any source?

12 A. Not that I'm aware of. We've never

13 done any type of merge with another database.

14 Q. Okay. And do you know anything about

15 the geographic makeup of those 80,000 voters?

16 A. Yes. Every voter, depending on their

17 registration address, is assigned a geolocation in

18 the statewide database, so we know their geolocation.

19 Q. Has the Commission analyzed the

20 geo -- geolocations of those 80,000 voters to

21 determine where -- where they resided?

22 A. No, we have not.

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1 Q. Do you have any idea of what

2 percentage of those 80,000 came from Milwaukee?

3 A. No, I do not.

4 MR. GAHNZ: Excuse me. I need to --

5 I need 30 seconds. I'll be right back.

6 MR. DEVANEY: Sure.

7 (Brief pause.)

8 MR. GAHNZ: Sorry about that.

9 MR. DEVANEY: No problem.

10 BY MR. DEVANEY:

11 Q. Ms. Wolfe, in one of your prior

12 answers you referred to intelligent barcodes. Could

13 you just describe for the record what that means?

14 A. Sure. An intelligent mail barcode

15 is, from my understanding, again, not as a postal

16 expert, but learning a lot, is that it is a barcode

17 assigned to -- a unique barcode assigned to each

18 individual piece of mail that allows it to be tracked

19 on its journey through the US Postal Service. So

20 like you would track a package or other important

21 document through the postal service.

22 Q. Does the intelligent mail barcode

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1 allow one to determine when a person put a piece of

2 mail into the postal system?

3 A. Again, I'm learning a lot, so this is

4 secondhand information. But in some municipalities,

5 in some jurisdictions, they may have the equipment,

6 when someone drops it off, to scan it in. That will

7 trigger the intelligent mail barcode to start

8 tracking right away. In others, it will take until

9 it gets to their sorting center or somewhere else

10 with the equipment before it's able to be scanned and

11 tracked.

12 Q. And you mentioned -- and I know this

13 was mentioned in the report to the court as well,

14 that there likely will be use of intelligent mail

15 barcodes for the upcoming elections. Can you -- can

16 you expand upon that and tell me how those barcodes

17 will be used, in particular in the November election?

18 A. Sure. So we are the ones -- the

19 State of Wisconsin Election Commission -- we develop

20 and maintain the statewide voter registration

21 database. And many of our local election officials

22 use that database to print out labels for their

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1 absentee ballots. So they can go in and see who has

2 a request on file, and they can produce labels. And

3 then we're able to see that those have been issued

4 out of the statewide system.

5 And right now we're working to

6 incorporate the USPS intelligent mail barcode as part

7 of our label. So clerks that choose to, would be

8 able to populate a barcode on the label that they put

9 on their absentee ballot that goes out to their

10 voters. And then they also would be able to populate

11 a barcode label to put on the return envelope coming

12 back from the voter to the clerk.

13 And so again, it would allow the

14 voter and the clerk and us to track the ballots

15 through their journey, again, dependent on if the

16 clerk is using our labels and if the local postal

17 branches have the equipment to be able to process

18 that out, all the milestones.

19 Q. Has the Commission formally approved

20 the use of barcodes for the November election?

21 A. Yes, they have.

22 Q. And will the use of the barcodes be

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1 required of local election officials or optional for
 2 them?
 3 A. As with anything, we don't have any
 4 authority to be able to mandate it of them, but it
 5 will be available to all of them. And we're working
 6 closely with the clerks to develop different access
 7 points if they don't use our statewide database where
 8 they can still access the intelligent mail barcodes.
 9 So we will produce all the tools. We will lead them
 10 to the barcodes, but we can't make them use them.
 11 Q. Is the Commission encouraging local
 12 officials to use the barcodes?
 13 A. Yes.
 14 Q. And have you received -- or has the
 15 Commission received responses from the clerks about
 16 their willingness to use the barcodes?
 17 A. We have a clerk feedback committee --
 18 well, we have many clerk feedback committees,
 19 including one that has been working very hard over
 20 the last few months on this project. So we actually
 21 work directly with the clerks, and they help us
 22 develop these initiatives.

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1 And -- but yes, we've received a
 2 great deal of feedback from a wide array of types and
 3 sizes of jurisdictions. And they've presented some
 4 of their challenges, some of the efficiencies they
 5 see. And we've been weighing all of those -- those
 6 status points to try to make the process something
 7 that works for all the clerks.
 8 Q. Would you say the clerks have
 9 generally been receptive to using barcodes in the
 10 November election?
 11 A. Some are -- some are already
 12 overwhelmed and overworked and see this as another --
 13 another thing that they have to do. But most of them
 14 are very receptive to the transparency it will offer
 15 to voters.
 16 Q. Do you expect most clerks in the
 17 November election to use barcodes?
 18 A. I do, but we will see.
 19 Q. Fair enough. In the proceedings
 20 before Judge Conley back in March and April, the
 21 Commission ultimately said it had no objection to
 22 extending the deadline for receipt of absentee

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1 ballots from April 7th to April 13th.
 2 Do you recall that?
 3 A. Yes, I do.
 4 Q. Okay. As we talked about, that
 5 indeed happened, and you testified that that didn't
 6 affect the certification -- compliance with
 7 certification deadlines to the best of your
 8 knowledge. Were there any other effects on the
 9 Commission from the extension of that deadline?
 10 A. One of the more notable impacts I can
 11 think of is that the ability for local election
 12 officials to be able to count ballots received after
 13 election day, is that they had to be postmarked. And
 14 there were a lot of inconsistencies in postmarks.
 15 And so clerks were not able to
 16 definitively know when ballots were postmarked in a
 17 lot of cases. We were selecting some of the images
 18 of those postmarks. And so making those
 19 determinations -- their boards of canvass, trying to
 20 make determination about when a ballot was
 21 postmarked.
 22 Q. And would you agree that's an issue

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1 that potentially could be solved with the intelligent
 2 barcodes?
 3 A. Well, I'd hoped that it would be a --
 4 a complete solution; but again, some local postal
 5 branches, rural postal branches, may not have the
 6 equipment to be able to scan it right when they get
 7 it at the local branch, so it might not start
 8 tracking as received until it hits the sorting center
 9 from our understanding.
 10 Q. Uh-huh.
 11 A. So I don't know that's the perfect
 12 solution.
 13 Q. And do you know which postal offices,
 14 for lack of a better description, don't have the
 15 equipment necessary to record when the mail enters
 16 the mail stream?
 17 A. I do not. I'm sure the USPS would
 18 know, but I -- I do not. I'm sure it's like election
 19 offices, you know, there's 1,853 localities, and
 20 there's probably a similar amount of postal branches
 21 in small and large communities.
 22 Q. And with respect to the April

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1 election, when there was ambiguity, for lack of a
 2 better term, about a postmark, did the Commission
 3 provide guidance to clerks on how they should resolve
 4 that ambiguity?
 5 A. We provided guidance that said that
 6 they must adhere to the Supreme Court's ruling, which
 7 said that there had to be a postmark by April 7, and
 8 it must be received by April 13 in order to be
 9 counted. And it was set up to the Municipal Board of
 10 Canvass, the absentee ballot canvassers, to determine
 11 if the postmark did comply with the Supreme Court's
 12 ruling.
 13 Q. Do you know what criteria they
 14 applied to determine whether the postmark complied
 15 with the Supreme Court's ruling?
 16 A. I -- I do not know the specific
 17 criteria that each of the 1,850 used, no.
 18 Q. Okay. And did the Commission issue
 19 any criteria for them to apply?
 20 A. We did not issue criteria, because
 21 again, it's for the Board of Canvass to make that
 22 determination if it complies.

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1 Q. Okay. Given that the Commission
 2 ultimately consented to extending the deadline in
 3 April, has the Commission considered whether it would
 4 support extending the deadline again for either the
 5 August or November elections?
 6 A. I do not believe they have considered
 7 that for -- yet. It -- it hasn't been an item before
 8 them for consideration at this point.
 9 Q. Have you been involved in any
 10 discussions at the Commission about potentially
 11 extending the deadline?
 12 A. I do not believe so, no. They
 13 don't --
 14 Q. Go ahead.
 15 A. I'm sorry. I know that they have
 16 determined that they don't have the statutory
 17 ability/authority to be able to change any deadlines
 18 themselves, but that -- I -- I believe that is as far
 19 as those conversations have gone at this point.
 20 Q. Do you know if there are any plans
 21 the Commission has to take up that issue and to
 22 engage in discussion about whether to extend the

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1 ballot receipt deadline for the November election?
 2 A. It is not a discussion that's
 3 scheduled at this point.
 4 Q. Am I correct in understanding that
 5 one of the benefits of extending the deadline in
 6 April was that clerks had more time to give the
 7 unofficial results, and therefore, there was an
 8 increase in accuracy?
 9 A. I don't have an answer to that. I'm
 10 sorry. I -- I don't -- I don't have any comparable
 11 data there.
 12 Q. Okay. Would -- would you agree,
 13 though, that one of the benefits of extending the
 14 deadline was that clerks had more time to tabulate
 15 the unofficial results?
 16 A. In larger communities, I think
 17 they -- it's fair to say they utilized that time to
 18 be able to count the increased volume of absentees.
 19 Q. And would you agree that was a
 20 benefit of extending the deadline?
 21 A. Some communities would -- would
 22 certainly say that additional time was necessary, and

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1 it was a benefit to them.
 2 Q. And was it necessary just because of
 3 the unprecedented volume of mail ballots?
 4 A. Again, I -- not being on the ground
 5 of -- of counting, relaying what clerks have told us,
 6 some expressed that the volume was large enough that
 7 it warranted having multiple days to be able to
 8 count.
 9 Q. Bear with me one moment while I look
 10 at my notes here, please.
 11 THE VIDEOGRAPHER: Let me know if you
 12 it want to go off the record, all right?
 13 MR. DEVANEY: No, that's okay.
 14 BY MR. DEVANEY:
 15 Q. Ms. Wolfe, does the Commission have a
 16 process in place for the November election for
 17 dealing with the situation where a voter votes
 18 absentee, and then also shows up to vote in person?
 19 A. A -- a process, the statutes outline
 20 what is allowable under that circumstance. We
 21 don't -- I mean, we have training and guidance that
 22 relays the statutory construct.

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1 Q. And what, to the best of your memory,
 2 does the statute provide for in that circumstances?
 3 A. Would you please describe the
 4 scenario, again?
 5 Q. A voter, say, James Smith, submits an
 6 absentee ballot two weeks before the election, and
 7 then it -- it's -- it arrives at a clerk's office.
 8 It's counted, and then James Smith shows up on
 9 November 3 to vote in person?
 10 A. Thank you. I appreciate the
 11 clarification. So, yes, the statute states that if
 12 someone votes their absentee ballot, so if they
 13 receive an absentee ballot and they send it back,
 14 they are not eligible to receive a ballot at the
 15 polls on election day.
 16 If they received an absentee ballot
 17 but they did not return it, then they are eligible to
 18 receive a ballot at the polls on election day.
 19 That's -- we've also taken that
 20 process, and we have implemented a training and a
 21 process into the poll books. So if you're issued an
 22 absentee ballot, the status of your ballot at the

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1 time the poll books are printed will show with your
 2 name on the poll book.
 3 And so if you've been issued an
 4 absentee ballot, the poll worker will see that you
 5 were issued an absentee ballot, and they will ask
 6 you, did you return your absentee ballot? If the
 7 voter says, yes, we -- I returned my absentee ballot,
 8 then they will not be eligible to cast a ballot at
 9 the polls on election day.
 10 If the voter says, no, I have not
 11 returned it; I destroyed it, I didn't -- I'm not
 12 voting it, then they are able to cast a ballot at the
 13 polls on election day.
 14 If the voter has already returned
 15 their ballot, and it's in the clerk's possession, so
 16 they know the ultimate outcome of that ballot, that
 17 will also reflect on the poll book. And then, of
 18 course, the voter would not be eligible to be able to
 19 cast a ballot at the polls on election day.
 20 MR. DEVANEY: Henry, if you could go
 21 to -- I'm going from memory here, and I can't see
 22 with the screen, but I think it's Exhibit 7, which is

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1 the Commission's April 18 summary report.
 2 THE TECH: (Complying.)
 3 (Whereupon, Wolfe Exhibit 7, 4/18/20
 4 Commission Meeting Summary, was marked for
 5 identification.)
 6 MR. DEVANEY: And I think I got
 7 lucky; that is the right exhibit.
 8 THE TECH: (Complying.)
 9 BY MR. DEVANEY:
 10 Q. Ms. Wolfe, could you identify this
 11 for me, please?
 12 A. Yes, this is a report that I produced
 13 for the April 18 Commission Meeting summarizing the
 14 April 7 election.
 15 Q. Who -- who was involved in preparing
 16 this report?
 17 A. It was mostly prepared by myself, and
 18 then the team reviewed the report.
 19 Q. When you say "the team," would you
 20 define the team?
 21 A. Sure. The Wisconsin Elections
 22 Commission staff.

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1 Q. And was this report ultimately
 2 approved by the Wisconsin election commission?
 3 A. Yes.
 4 Q. The report, beginning at the bottom
 5 of Page 1 and carrying over to Page 2, and I think
 6 probably elsewhere in the report, discusses the
 7 challenges of obtaining supplies for the April 7
 8 election. Do you recall that discussion?
 9 A. Yes.
 10 Q. Has the -- with that in mind, has the
 11 Commission surveyed local election officials for
 12 determining supply needs for the November election?
 13 A. Yes, we have. We've started to work
 14 with them to survey their needs for both August and
 15 November, and we actually already have tickets and
 16 procurement in the works, as well as distribution in
 17 the works, to get them the supplies they need prior
 18 to August and November.
 19 Q. And are -- do you know, are there --
 20 are there supply shortages? Are there sufficient
 21 supplies of materials available?
 22 A. As of right now, we're hearing that

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1 we have access to the supplies that we're seeking.
 2 And so, again, that's why we're trying to procure
 3 them all now for both August and November, so that we
 4 have everything in place in case there is a shortage
 5 when all 50 states are competing for resources in
 6 November.
 7 MR. DEVANEY: And if you could go to
 8 Page 3 of this, please.
 9 THE TECH: (Complying.)
 10 BY MR. DEVANEY:
 11 Q. There is a discussion here of the
 12 WisVote database, and then I think there's discussion
 13 also in this document of -- of MyVote.
 14 Is it correct that WisVote and MyVote
 15 were designed on the premise that a majority of
 16 voters would be voting in person?
 17 A. Yes, it -- it was all developed with
 18 analytics and data of users' behavior in our systems.
 19 And so all workflows were developed in accordance to
 20 patterns of usage.
 21 Q. And is it correct that both WisVote
 22 and MyVote will be used in the November election this

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1 year?
 2 A. Yes.
 3 Q. And would you agree that we can
 4 expect that a majority of voters will vote absentee
 5 in the November election?
 6 A. We don't have a reliable way to
 7 forecast, but we are certainly planning for a high
 8 volume to -- to make sure that our systems are ready.
 9 Q. And because WisVote and MyVote are
 10 designed based on the premise that a majority of
 11 people would vote in person, are changes required to
 12 those databases to prepare for the November election?
 13 A. Yes.
 14 Q. And what -- what -- can you summarize
 15 for each system what changes are required, and by the
 16 way if you want to refer to a document where this is
 17 laid out, that's fine.
 18 A. All right. I will do my best to
 19 summarize them high level. When it comes to WisVote,
 20 which is the statewide voter registration data base,
 21 so this is the database where all of our local
 22 election officials work to enter voter registration,

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1 to issue absentee ballots, process nomination papers.
 2 End to end it's what administers elections on the
 3 back end, and so that process, we need to update it
 4 for clerks to have efficiencies when it comes to
 5 issuing absentee ballots so when a municipality is
 6 issuing 6 percent of their ballots by mail, they can
 7 use a pen and a stamp to issue an absentee ballot.
 8 It's a human-driven process in many of our small
 9 townships.
 10 When 60 percent or more of the
 11 ballots are being requested by mail, now you need to
 12 have a -- a more efficient process to be able to
 13 print labels and things and to have workflows that
 14 allow them to print the labels, to track the ballots,
 15 to do all of the things without having to have a
 16 touch point in the system. And so the biggest thing
 17 is creating those efficiencies for them, checks for
 18 them so that when they are dealing with these huge
 19 volumes of absentee ballots, that they are able to
 20 recognize if there are any that they missed, if
 21 there's any issues that they need address to make
 22 sure the voter gets their ballot. Also creating

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1 auditing tools, and then just for the data entry
 2 piece is a huge change that needs to be made as well.
 3 When a voter makes their absentee
 4 ballot request, they are required to provide a photo
 5 ID. Some voters already have a photo ID on file so
 6 we were already importing that absentee ballot
 7 request information for their review into the system,
 8 but if it needed a photo ID, that had to go to the
 9 clerk by E-mail because they had the statutory
 10 authority to review the application and the ID and
 11 accept it or deny it. We're now creating a pending
 12 module in the system so that if a voter does submit
 13 their absentee ballot request and photo ID, we can
 14 pull that information in as a pending application for
 15 them to review everything in the system so they don't
 16 have to hand-key it in. So this helps with accuracy,
 17 and it helps a great deal with efficiency and clerks
 18 being able to handle the volume of requests that they
 19 were receiving. And then, of course, the intelligent
 20 mail barcodes and building in those tracking
 21 components is another very significant change in the
 22 WisVote database.

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1 Q. What is the status of those changes?
 2 Have they been completed? Are they still in process?
 3 A. Many of them are completed, and
 4 again, we're -- we're working through testing,
 5 launching the programs to understand if they are
 6 working well for clerks in August so that they can be
 7 fully refined for November. So many of them are
 8 completed or sort of in the beta phase at this point.
 9 Q. Which changes remain to be completed?
 10 A. Well, is anything ever really
 11 completed because there's always room for improvement
 12 and to make them better. But I would say all of the
 13 projects I described are at least at a -- a working
 14 point that we're -- we're still refining.
 15 MR. GAHNZ: John, we've been going
 16 for about an hour and a half. Is this a good time
 17 for a short break?
 18 MR. DEVANEY: Sure, Dixon, that's --
 19 that's fine. Just let me know how long you'd like to
 20 take.
 21 MR. GAHNZ: Meagan, five minutes?
 22 THE WITNESS: Sure.

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1 MR. GAHNZ: Okay.
 2 THE VIDEOGRAPHER: The time is
 3 11:29 a.m. Off the record.
 4 (Recess taken.)
 5 THE VIDEOGRAPHER: The time is
 6 11:36 a.m. Back on the record.
 7 BY MR. DEVANEY:
 8 Q. Ms. Wolfe, we had a short
 9 conversation earlier about making supplies available
 10 to local election offices. Would you say that it's
 11 the Commission's responsibility to ensure that those
 12 local offices have sufficient supplies?
 13 A. We don't have any sort of statutory
 14 responsibility to do that, but certainly felt like
 15 the right thing to do.
 16 Q. On Page 5 of this memo --
 17 MR. DEVANEY: Henry, if you'd go to
 18 Page 5.
 19 THE TECH: (Complying.)
 20 BY MR. DEVANEY:
 21 Q. There is a statement in here that the
 22 Commissioner is exploring ways to absorb unbudgeted

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1 postage and envelope costs by using federal grant
 2 funds. What is the status of that?
 3 A. The Commission approved, and we've
 4 begun to administer a significant subgrant program to
 5 the local election officials. So local election
 6 officials can apply to our office to receive a base
 7 grant of at least \$200 plus \$1.10 per registered
 8 voter in their jurisdiction, and that can be used to
 9 address any of their unbudgeted COVID-related
 10 expenses such as buying envelopes, paying for
 11 postage, other supplies, personnel that they might
 12 need to accommodate the new voter behavior.
 13 Q. And I'm sorry, what is the source of
 14 those funds?
 15 A. The federal CARES Grant Act funding
 16 that was given specifically to elections.
 17 Q. Okay. At the bottom of Page 5,
 18 there's reference here that -- it says, "The WEC then
 19 sent a survey to all municipal clerks asking them to
 20 identify their poll worker shortages."
 21 Do you see that?
 22 A. Yes, I do.

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1 Q. And then it goes on to say, "Based on
 2 the survey, municipalities reported a shortage of
 3 more than 7,000 poll workers."
 4 When -- when was that survey
 5 conducted?
 6 A. You'll have to -- I -- I'm not sure
 7 exactly what the date was of it, and I know it was
 8 dynamic. It changed. We were working with them on a
 9 continual basis, which we always do, so I don't know
 10 that there was a finite date for this survey.
 11 Q. Was that -- to be clear, was that
 12 before or after the April 7 election?
 13 A. Prior to the April 7 election.
 14 Q. And why -- why did the Commission
 15 conduct that survey?
 16 A. To understand if local election
 17 officials had the poll workers that they needed to be
 18 able to operate within the statutory requirements for
 19 running a polling place, and to assist them, to try
 20 to find ways that we could assist them in fulfilling
 21 any gaps that they were seeing.
 22 Q. My question for you related to this

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1 is: Does -- does the Commission plan to conduct a
 2 similar survey for the August and November elections?
 3 A. Yes, absolutely. We -- we conduct
 4 this type of survey with them on a continual basis.
 5 We did so for the May 7 congressional district.
 6 We've been in regular contact with them heading into
 7 the August elections, and we will continue to do so
 8 as we head into November.
 9 Q. Do you have survey results already
 10 for August?
 11 A. Results I don't think is the right
 12 word for it again, it's a dynamic reporting
 13 opportunity for them to let us know day to day where
 14 they stand, and it's really for them to raise a red
 15 flag if they see any issues and they need our help.
 16 Q. Are there any municipalities that
 17 have reported already poll worker shortages for
 18 either the August or November elections?
 19 A. I don't believe so, but I think it
 20 may be too early for them to know.
 21 Q. Okay. Are there -- are there
 22 documents that show the survey results?

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1 A. I'm not sure. There -- if -- if
 2 there are documents, they were provided, but I'm not
 3 sure what was provided.
 4 Q. Okay.
 5 MR. DEVANEY: If we could go to Page
 6 8 of this document, Henry.
 7 THE TECH: (Complying.)
 8 MR. DEVANEY: Sorry, bear with me one
 9 moment here. And actually go to page 9.
 10 THE TECH: (Complying.)
 11 MR. DEVANEY: Sorry, bear with me.
 12 If you go to page 10.
 13 THE TECH: (Complying.)
 14 MR. DEVANEY: Okay. Sorry, we're
 15 done with this document. If we could then go to the
 16 next exhibit, Henry.
 17 (Whereupon, Wolfe Exhibit 8, 05/15/20
 18 WEC Report on April 2020 Absentee Voting, was marked
 19 for identification.)
 20 THE TECH: (Complying.)
 21 Okay. That would be Exhibit 8,
 22 right?

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1 MR. DEVANEY: Correct.
 2 THE TECH: Okay. Just making sure.
 3 BY MR. DEVANEY:
 4 Q. Ms. Wolfe, could you describe Exhibit
 5 8 for me? It's titled April 7, 2020, absentee voting
 6 report.
 7 A. Yes, the Commission directed staff to
 8 conduct a analysis and provide a report on what we
 9 knew about absentee voting in the April 7 election,
 10 and this is that report which was provided to them at
 11 their meeting on May 15.
 12 Q. And who prepared this report?
 13 A. I did along with the assistance of
 14 the WEC staff.
 15 Q. And was this approved by the
 16 Commission?
 17 A. Yes, it was.
 18 Q. And is the information in the report
 19 true and accurate to the best of your knowledge?
 20 A. Yes, it is.
 21 MR. DEVANEY: Henry, please go to
 22 Page 3.

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1 THE TECH: (Complying.)
 2 BY MR. DEVANEY:
 3 Q. Ms. Wolfe, I'm certainly paraphrasing
 4 here, but my notes, based on my review of this page,
 5 indicate that absentee voting is described here as
 6 largely a manual process. Do you agree with that?
 7 A. Well, we work fast, and so we've
 8 changed a lot of the things like we just talked about
 9 to make it a more automated process. But yes, prior
 10 to April, it was a very manual process.
 11 Q. Does it continue to be manual in
 12 multiple ways?
 13 A. You know, I -- I'm not sure.
 14 They're -- we're-- we're doing a -- a -- a lot to
 15 help to avoid some of those manual processes or to
 16 create efficiencies. So I don't know that I would
 17 describe it as manual anymore, because I think
 18 there's a lot of automation that's happening right
 19 now and a lot of options that large jurisdictions are
 20 exploring to remove some of the inefficient manual
 21 processes.
 22 MR. DEVANEY: Okay. Henry, if you

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1 could move the document to the left, please.
 2 THE TECH: (Complying.)
 3 BY MR. DEVANEY:
 4 Q. The report says that -- and I'm
 5 looking at Paragraph 2. It says, "Absentee voting
 6 remains a largely manual, labor-intensive process
 7 administered by each individual jurisdiction across
 8 the state."
 9 And then it goes on to say, "While
 10 voters can request a ballot and upload a photo ID on
 11 their smartphone in just a few minutes, behind the
 12 scenes clerks must still manually verify the IDs,
 13 stuff and seal envelopes by hand, apply postage,
 14 carry boxes of envelopes to the post office, and
 15 physically check off each request."
 16 Which of those tasks will clerks
 17 still have to perform in the upcoming elections?
 18 A. Well, let's see. Behind the scenes,
 19 manually verify ... so they'll still have to verify
 20 the photo ID, but we're eliminating the data entry
 21 piece of that. And the photo ID will go directly
 22 into the statewide system for them to then have a

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1 workflow that -- you know, they will just be able to
 2 check a box rather than having to receive it, store
 3 it, all those things.
 4 Doesn't seal the envelope by hand.
 5 Some jurisdictions, of course, will still have to do
 6 that. Others are looking -- from what I
 7 understand -- at contracting with companies or groups
 8 or mail providers that can assist with that process
 9 of printing them and actually putting them in the
 10 envelopes.
 11 Applying postage. Again, an envelope
 12 is always going to have to have postage on it, but
 13 there are some efficiencies that jurisdictions are
 14 now exploring to get their indicia printed on their
 15 envelopes so that postage isn't a separate piece.
 16 And then carrying boxes of envelopes.
 17 That will depend on, you know, the size of the
 18 jurisdiction. Again, some may contract with a mail
 19 service to do that part of it.
 20 And check off each request. We're
 21 also, you know, working on involving those auditing
 22 features so that they can make sure that everything

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1 that comes into the system, actually results in an
 2 envelope and a ballot that goes out.
 3 So I would say in almost all of those
 4 areas, there are opportunities for them to adopt an
 5 efficiency if they decide that that is right for
 6 them.
 7 Q. Okay. Thank you for that. If you'd
 8 go to Page 4 please?
 9 MR. DEVANEY: I just want to make
 10 sure that we have these data in the record. If you
 11 can move the document to the left, please, Henry?
 12 THE TECH: (Complying.)
 13 BY MR. DEVANEY:
 14 Q. And Table 1 on Page 4 shows that the
 15 total ballots cast by mail in the April election,
 16 964,433; is that correct?
 17 A. Yes, that's correct.
 18 Q. And that far surpassed any prior
 19 experience that Wisconsin had in any of its
 20 elections, correct?
 21 A. Yes, that's correct.
 22 Q. And -- sorry, bear with me one

Page 84

1 second. The report goes on to say too that "it's
 2 impossible to determine how many voters were unable
 3 to cast a ballot for this election due to concerns
 4 and complications related to COVID."
 5 Do you see that?
 6 A. Yes.
 7 Q. Has the Commission done any analysis
 8 since this report of how many voters did not vote
 9 because of COVID?
 10 A. That's not data we would have, no.
 11 Q. Okay. Was there any survey done to
 12 try to gather information about that?
 13 A. No.
 14 MR. DEVANEY: And then if we could go
 15 to Page 6, please.
 16 THE TECH: (Complying.)
 17 BY MR. DEVANEY:
 18 Q. And it's stated here that "1 in 10
 19 ballots were either not returned to the clerk or
 20 returned but rejected."
 21 Do you see that?
 22 A. Are you looking at Table 5?

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1 Q. Sorry. It says, "Nearly 1.3 million
 2 absentee ballots were delivered to voters for the
 3 April election, either by mail or in person at local
 4 clerks' offices. While almost 90 percent of ballots
 5 were returned and counted, approximately 1 in 10
 6 ballots were either not returned to the clerk or were
 7 returned but rejected."
 8 Do you see that?
 9 A. Yes, I do.
 10 Q. And what does that raw number
 11 calculate to? The number of ballots that were not
 12 returned to the clerk or were rejected? Is that
 13 here?
 14 A. I don't see it on this page. Oh,
 15 wait. Is it in Table 5 below? Sorry. The quality
 16 is not great of my image. Thank you.
 17 So Table 5 describes the breakdown of
 18 that data.
 19 Q. Okay. And these were numbers that
 20 were unprecedented in Wisconsin, correct? You've
 21 never seen numbers this high?
 22 A. In terms about issues, that's

Page 86

1 correct.
 2 MR. DEVANEY: Okay. And now, if we
 3 go to Page 12.
 4 THE TECH: (Complying.)
 5 BY MR. DEVANEY:
 6 Q. There's a statement on this page
 7 that -- and I'll try to direct you. Second
 8 paragraph, it says, "Some voters also reported not
 9 receiving their absentee ballots while others
 10 reported that their completed ballots were not
 11 returned to the clerk in a timely fashion?"
 12 Do you see that?
 13 A. Yes, I do.
 14 Q. Did the Commission evaluate how many
 15 voters did not receive their ballots?
 16 A. We wouldn't know, with any sort of
 17 certainty, how many did or did not receive their
 18 ballots. But we did analyze reports or information
 19 that we did have, to try to understand why. So we
 20 only know what we know. So if a voter reports
 21 something to us, then we have that data. Otherwise,
 22 we did not have that data to analyze.

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1 Q. And are those reports that you
 2 investigated where voters didn't receive their
 3 absentee ballots, are they reflected in this
 4 document?
 5 A. I believe so. We have the case
 6 studies where we talk about jurisdictions that we
 7 looked into because of reports that came to our
 8 office. So, yes.
 9 Q. Okay. Are there any other incidents
 10 of voters not receiving their absentee ballots that
 11 were investigated, that are not included in this
 12 report?
 13 A. I'm sure there were individual
 14 circumstances that didn't rise to the level of a
 15 trend. That would have been provided as part of our
 16 discovery, yes.
 17 Q. And it's also stated here that others
 18 reported that their completed ballots were not
 19 returned to the clerk in a timely fashion. Do you
 20 see that?
 21 A. Yes, I do.
 22 Q. Did the Commission investigate those

Page 88

1 incidents?
 2 A. Yes. Again, in the case studies we
 3 discuss those that were brought to our attention or
 4 raised to a level of a trend.
 5 MR. DEVANEY: If you can go, please
 6 then, to Pages 15 through 18.
 7 THE TECH: (Complying.)
 8 BY MR. DEVANEY:
 9 Q. Page 15, and there's a section here
 10 called "Concerns About Mail Service." Are you able
 11 to give a general description of what concerns you
 12 had about what mail service when you prepared this
 13 report and investigated what occurred on the April 7
 14 election?
 15 A. Sure, there are a couple of
 16 categories that are further laid out this in report
 17 better than I can summarize right now. But voters
 18 who reported either not receiving their ballots, or
 19 it took a long time for their ballot to be returned
 20 to their clerk, there were some issues where ballots
 21 were being returned to the municipal clerk with no
 22 explanation about why they were returned.

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1 There were some issues with the
 2 postal service where they identified having ballots
 3 at their sorting center that didn't go out. We
 4 actually -- they were never able to provide clarity
 5 on if those were outgoing, coming back. But they
 6 were ballots that were in the sorting centers longer
 7 than they should have.

8 I believe these are the main
 9 categories described in the report.

10 Q. Is it fair to say, Ms. Wolfe, you had
 11 significant concerns about the performance of the
 12 postal service in connection with the April 7
 13 election?

14 A. Yes. These were certainly
 15 significant concerns, yes.

16 MR. DEVANEY: If we could go to the
 17 next page, please.

18 THE TECH: (Complying.)
 19 BY MR. DEVANEY:

20 Q. At the top it says, "The City of
 21 Oshkosh and other Fox Valley communities all reported
 22 voters complaining that their ballots were arriving

Page 90

1 late or not arriving at all. WEC staff investigated
 2 each complaint received where enough information was
 3 available to identify the voter."

4 Can you summarize what conclusion was
 5 reached as to the cause of these voters not receiving
 6 their ballots or receiving them late?

7 A. Sure. So again, every instance in
 8 this case that was reported to us, we worked with the
 9 voters to, first of all, identify if they actually
 10 were issued the ballots. You'd be surprised how
 11 often people tell us they were issued a ballot when
 12 they weren't.

13 And then we were able to make sure
 14 that it was issued by the local clerk, that, you
 15 know, they produced the label and a record in the
 16 system.

17 And then we had multiple follow-ups
 18 with USPS to try to identify if they had any
 19 information about them. So we tried to find out what
 20 they knew about the process.

21 And it was related to us at some
 22 point that they had what they called bins of ballots

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1 at one of the sorting centers, but they were never
 2 able to provide us any additional information about
 3 those ballots. They didn't have scans of them.

4 Contrary to some reports I've seen in
 5 the media or social media, they were never returned
 6 to our office. It was suggested that they were still
 7 going to continue on their journey out to the voters
 8 or to the clerks.

9 But ultimately, yes, in that
 10 situation, we worked with the USPS to get as much
 11 information as we could about that situation --

12 Q. And did you determine what the cause
 13 was for those tubs of ballots not being delivered in
 14 a timely manner?

15 A. That would be a question for the
 16 postal service.

17 Q. Did they provide an answer?

18 A. The answer that they provided is just
 19 as described here.

20 Q. Okay. And was it a total of about
 21 1,600 ballots?

22 A. Again, that's relaying what they sent

Page 92

1 to us. But yes, that's what they conveyed to us, an
 2 estimate.

3 Q. And then you go on to say here that
 4 "the Commission also investigated reports from
 5 Oshkosh suggesting that ballot requests were received
 6 but not fulfilled. While many of the cases involved
 7 incomplete records, other records appeared complete.
 8 Staff researched several dozen Oshkosh area ballot
 9 requests that were entirely valid, including those of
 10 Assembly Representative Gordon Hintz and his spouse."

11 Can you tell me what you concluded
 12 based on that investigation?

13 A. Sure. So, again, same thing, first
 14 thing we did is take a look at each of the records
 15 that were reported to us, and we found in some cases
 16 individuals did not actually submit an absentee
 17 ballot request; and -- and others, that they maybe
 18 submitted one, but it didn't include the photo ID,
 19 and they hadn't followed up with their clerk to
 20 provide one. And then there were other instances
 21 where the voter had submitted their request, and it
 22 had been fulfilled by the clerk. And -- and so

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1 that's the data we are able to get out of the
 2 statewide system.
 3 Q. Been filled by the clerk, but they
 4 didn't receive the ballot, correct?
 5 A. Correct.
 6 Q. And did you determine why?
 7 A. Again, that was -- then, spurred the
 8 conversation with the postal service, who identified
 9 these -- these issues. But without intelligent mail
 10 barcodes, there, we don't have any data to know if
 11 the voter did eventually receive their ballot.
 12 Perhaps there was a delay, or it came to them later.
 13 We wouldn't have that information without the
 14 intelligent mail barcode.
 15 Q. Okay. And then down at the bottom of
 16 this page, there -- you discuss that "smaller
 17 municipalities reported issues with ballots reaching
 18 residents or being returned to the clerk in a timely
 19 fashion."
 20 You go on to say, "The Village of Fox
 21 Point was among them and experienced an unusual chain
 22 of events that garnered some media attention. For

Page 94

1 two weeks, absentee ballots that were supposed to
 2 mailed to Fox Point residents were repeatedly
 3 returned to the Fox Point Village Hall by the post
 4 office before reaching voters."
 5 Did you look into this?
 6 A. Yes, we did. And I should have
 7 mentioned, too, upon direction of the Commission, I
 8 sent a letter to the USPS asking for information on
 9 all of these scenarios, and the report reflects any
 10 information we received from them, which was, again,
 11 not much.
 12 Q. Did you come to any conclusions as to
 13 why these ballots were repeatedly returned to the Fox
 14 Point Village Hall by the post office?
 15 A. We did not. I know Fox Point put in
 16 tickets with the USPS trying to get information, as
 17 well, but I'm not aware that they got any answers or
 18 resolution either.
 19 Q. Do you know what happened with --
 20 with these voters? Were they permitted to vote?
 21 A. I'm not sure -- I'm sure we did an
 22 analysis, I don't know -- I -- I -- I'm sorry, I

Page 95

1 don't know off the top of my head what, you know,
 2 percentage of them ultimately were able to cast a
 3 ballot, but we would have that data.
 4 Q. Yeah. Is it true that some of them
 5 did not have their votes counted because of these
 6 errors by the post office?
 7 A. I don't know. I don't have that
 8 data.
 9 Q. And with respect to the tub of, what
 10 was reported to be, approximately 1,600 ballots in
 11 Appleton and Oshkosh, do you know how many of those
 12 ballots were ultimately counted?
 13 A. I -- I do not know what the
 14 percentage was, no.
 15 Q. Do you know how many of those voters
 16 were unable to actually cast a vote because of this
 17 error?
 18 A. I do not.
 19 MR. DEVANEY: Could we go to Page 17?
 20 THE TECH: (Complying.)
 21 BY MR. DEVANEY:
 22 Q. All right. The third paragraph on

Page 96

1 this page, it says, "Statewide, the volume of
 2 absentee requests received remained high in the week
 3 prior to April 7th. Clerks received over 60,000
 4 requests alone on the Friday before election day."
 5 It says, "Even if all these requests
 6 were mailed on Saturday, it is unknown how long those
 7 ballots took to reach voters."
 8 Do you see that?
 9 A. Yes, I do.
 10 Q. And you testified earlier that the
 11 USPS has been advising to expect seven days for the
 12 mailing of a ballot and another seven days for the
 13 return of the ballot. Based on that, it's fair to
 14 infer that a significant number of these requests
 15 resulted in voters not -- not receiving their --
 16 their ballots on time, correct?
 17 A. We don't have the specific data on
 18 that. So, again, without intelligent mail barcodes,
 19 we won't know how long or if those ballots reach the
 20 voter when --
 21 Q. But -- but using the USPS's estimates
 22 of seven days, wouldn't you agree with me that most

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1 of those ballots did not arrive in time for the
 2 voters to actually cast them?
 3 A. I really wish I did know that data,
 4 but we -- you know, there are -- that -- that's the
 5 guidance that they've given us; but, again, you
 6 they've also told us that First-Class mail should
 7 only take two days. So I really -- I really don't
 8 know. I certainly wish I did.
 9 Q. Okay. Ms. Wolfe, would you agree
 10 with me that your report and the experiences in the
 11 April election show some systemic problems with the
 12 US Postal Service in that election?
 13 A. There are -- there were -- there were
 14 certainly issues identified, and our goal with this
 15 report is to learn as much as we can to identify any,
 16 you know, issues that we might be able to -- to
 17 remedy on our side of things, with what we have
 18 control over.
 19 Q. And these systemic problems that
 20 we're seeing resulted in a significant number of
 21 ballots arriving after April 7, correct?
 22 A. I don't know that those two ideas are

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1 tied together. I don't -- I guess, I'm not sure
 2 what -- I -- I can't answer that.
 3 Q. Well, one -- one way to ask it
 4 differently is: Would you agree with me that by
 5 extending the election day receipt deadline for
 6 absentee ballots, that is a way to provide protection
 7 against the types of errors we're seeing from the US
 8 Postal Service?
 9 A. I can only speak as to the data which
 10 is, you know, presented here, in terms of how many
 11 ballots were received, that were postmarked by
 12 election date and received by the 13. So, you know,
 13 the -- the data, I suppose, will have to speak for
 14 itself.
 15 Q. Would you agree with my statement,
 16 though, that extending the deadline is a way of
 17 protecting against the types of errors we see by the
 18 post office in your report?
 19 A. I -- I don't -- I -- I think there's
 20 a lot more complexity to it; so, no, that -- that's
 21 too much of a blanket statement.
 22 Q. What steps has the Commission taken,

Page 99

1 since this report, to ensure that the types of errors
 2 we see here don't occur again with the post office?
 3 A. Oh, right. You know, we don't have
 4 any control or authority over the post office, so we
 5 have to take a look at our process, our system, our
 6 best practices for our clerks and figure out how we
 7 can help them to identify if there are issues.
 8 So one, again, is the intelligent
 9 mail barcodes. If a jurisdiction is using those, it
 10 will identify these issues. Voters will be able to
 11 see where their ballot is in the process, a clerk
 12 will be able to see if there is a hang up in a
 13 sorting center or somewhere else where the ballots
 14 have been stuck and be able to either reissue them to
 15 a voter or talk with their postal branch to figure
 16 out what's going on. So that will be a significant
 17 improvement.
 18 Another is auditing tools. So as
 19 we're able to further automate some of these systems
 20 in our statewide system, it will allow clerks to get
 21 reports to make sure that ballots are indeed hitting
 22 the postal stream, to make sure that they have

Page 100

1 produced labels and all of their ballots have
 2 actually gone out.
 3 And, again, if they have not, they
 4 will be able to identify those right away so that
 5 they can correct it, so they can work with the voter
 6 to issue a replacement ballot so that they don't wait
 7 for a ballot that's delayed or that may have it --
 8 had issues sending it.
 9 Q. Ms. Wolfe, is it fair to say that
 10 based on the experience that you had in the April
 11 election, that you have concerns about the post
 12 office's ability to deliver ballots to voters on time
 13 in the August and November elections?
 14 A. I -- I see the need for us to
 15 continue to work to understand their process and to
 16 do anything that we can to improve the process and to
 17 make sure that these issues aren't experienced again.
 18 So I'm -- I'm solution-oriented.
 19 Q. I'm sorry, can you say it -- what was
 20 your last statement?
 21 A. Oh, I -- I'm very solution-oriented,
 22 so I, you know, I'm -- I'm looking ahead to how can

Page 101

1 we find a solution.

2 Q. But you don't know what solutions the

3 post office is implementing to address the problems

4 that you discovered, do you?

5 A. No.

6 Q. Ms. Wolfe, in your -- in this report,

7 you referred to the fact that one of the challenges

8 of the significant volume of absentee voting in the

9 April election is that there were many first time

10 absentee voters, correct?

11 A. Yes.

12 Q. And would you expect the same to be

13 true in the August or November elections of this

14 year, that there'll will be many first time absentee

15 voters?

16 A. That's to be seen. I don't know. If

17 there are -- there are many that have now

18 participated in April and are now familiar with that

19 process. So I don't know how many first time

20 absentee voters will be in November.

21 Q. What -- what are the unique

22 challenges that are -- that are presented by first

Page 102

1 time absentee voters?

2 A. A first time absentee voter needs to

3 provide a photo ID, most of them, with their absentee

4 ballot request. So the law says that with your first

5 absentee ballot request, you have to provide your

6 photo ID. And then it stays on file for all

7 subsequent requests until the voter changes their

8 registration, then they have to provide another one.

9 So that's something that they need to

10 do, either electronically or with their by-mail

11 request.

12 Q. And -- and because first-time voters

13 aren't familiar with that process, the frequency of

14 mistakes and the necessity of involvement by clerks

15 is -- can be fairly high; is that correct?

16 A. I don't -- we haven't done that

17 analysis to my knowledge. I don't know.

18 Q. Okay.

19 MR. DEVANEY: Okay. Henry, if we

20 could go to -- I think it would be Exhibit 9.

21 THE TECH: (Complying.)

22 (Whereupon, Wolfe Exhibit 9, 06/25/20

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1 WEC Defendants' Status Report, was marked for

2 identification.)

3 BY MR. DEVANEY:

4 Q. Ms. Wolfe, are you familiar with this

5 status report that the Commission submitted to the

6 court on June 25?

7 A. Yes, I am.

8 Q. Were you involved in preparing this?

9 A. Yes, I was.

10 Q. Okay.

11 MR. DEVANEY: If you could please go

12 to Page 2.

13 THE TECH: (Complying.)

14 BY MR. DEVANEY:

15 Q. And the -- could you just describe

16 the purpose of this report.

17 A. The court asked us to provide a

18 status report of what we were doing to prepare for

19 the fall election.

20 Q. And are each of the items listed in

21 this report measures that the Commission has formally

22 approved?

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1 A. I believe so. I believe so. I --

2 I'm not 100 percent certain, but I believe so.

3 Q. Let's go through and see if we can

4 get some clarity on that.

5 MR. DEVANEY: Please go to the next

6 page, Henry.

7 THE TECH: (Complying.)

8 BY MR. DEVANEY:

9 Q. Okay. Absentee ballot mailers, we --

10 the document speaks for itself, I just want to ask

11 you: Is this a particular step that the Commission

12 has already approved?

13 A. Yes.

14 Q. Okay.

15 MR. DEVANEY: And then let's go to

16 the next page.

17 THE TECH: (Complying.)

18 BY MR. DEVANEY:

19 Q. Sanitation and PPE supplies is the

20 next step. Has the Commission formally approved

21 this?

22 A. Yes.

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1 MR. DEVANEY: And the next page.
 2 THE TECH: (Complying.)
 3 BY MR. DEVANEY:
 4 Q. This refers to funding to municipal
 5 clerks. Again, has the Commission approved what is
 6 described here?
 7 A. Yes.
 8 MR. DEVANEY: And the next page.
 9 THE TECH: (Complying.)
 10 BY MR. DEVANEY:
 11 Q. Intelligent mail barcodes, we have
 12 discussed this, and I think you confirmed before that
 13 the Commission has improve -- approved the use of
 14 intelligent mail barcodes, correct?
 15 A. Yes.
 16 Q. By the way, do you agree that that
 17 approval will reduce the number of ballots for which
 18 it's impossible or difficult to see a postmark?
 19 A. There will be additional data
 20 available. I don't -- not being a postal expert, I
 21 don't know that that qualifies under their definition
 22 of postmark. You know, again, I'm learning a lot,

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1 says, "The WEC has directed staff to spend Federal
 2 Help America Vote Act security funds." Has this been
 3 approved by the Commission?
 4 A. Yes.
 5 MR. DEVANEY: And next page, please.
 6 THE TECH: (Complying.)
 7 BY MR. DEVANEY:
 8 Q. HAVA Election Subgrant, has this item
 9 been approved by the Commission?
 10 A. Yes.
 11 MR. DEVANEY: And then next.
 12 THE TECH: (Complying.)
 13 BY MR. DEVANEY:
 14 Q. Changes to MyVote, is this an item
 15 that's approved by the Commission or just something
 16 the staff is carrying out?
 17 A. The commission is aware of it.
 18 They've been updated on what we're doing, but they
 19 don't sign off on each individual change.
 20 Q. Okay.
 21 MR. DEVANEY: And then next, Henry.
 22 THE TECH: (Complying.)

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1 but if you look at their manual, a postmark is a
 2 pretty specific thing that is made on an envelope, a
 3 mark that's made on an envelope, whereas the
 4 intelligent mail barcode is more or less data about
 5 the -- the piece of mail's journey.
 6 Q. The postmark shows when the mail -- a
 7 piece of mail entered the postal office stream,
 8 correct?
 9 A. In theory.
 10 Q. And the barcode has that same
 11 information?
 12 A. Again, in -- in theory, yes.
 13 Q. Okay.
 14 MR. DEVANEY: Next page, please.
 15 THE TECH: (Complying.)
 16 BY MR. DEVANEY:
 17 Q. The next item is Clerk Advisory
 18 Committee for vote by mail.
 19 A. The Commission did not formally adopt
 20 this, but it's a usually practice of our agency.
 21 Q. Okay. And then the next item is
 22 "HAVA Election Security Subgrant to Counties." It

Page 108

1 BY MR. DEVANEY:
 2 Q. Same question for changes to WisVote?
 3 A. Same answer, the Commission is aware
 4 of the changes we're making I guess by -- they did
 5 approve our absentee report that goes through the
 6 changes that we plan to make, and they approved that,
 7 but they don't individually approve each change to
 8 the WisVote system as something we do as a normal
 9 part of business.
 10 Q. Okay.
 11 MR. DEVANEY: And then the next item,
 12 Henry.
 13 THE TECH: (Complying.)
 14 BY MR. DEVANEY:
 15 Q. Usability testing, similar answer, I
 16 take it?
 17 A. Yes.
 18 MR. DEVANEY: And then the next item.
 19 THE TECH: (Complying.)
 20 BY MR. DEVANEY:
 21 Q. Poll worker recruitment training and
 22 I think we've discussed this. Is -- has this been

Page 109

1 subject to commission approval?

2 A. Yes, I believe so. Before April they

3 signed off on our approach to poll worker

4 recruitment, and, of course, if we needed National

5 Guard assistance, again, that would be a decision

6 they would be involved in.

7 MR. DEVANEY: Okay. And the next

8 page, please.

9 THE TECH: (Complying.)

10 BY MR. DEVANEY:

11 Q. And has this item also been approved

12 by the Commission?

13 A. Yeah, the Commission did as part of

14 our 2018 HAVA security grant funding -- grant

15 spending plan approved the development of voter

16 outreach tools, so a lot of those involved creation

17 of videos and documentation for voters to understand

18 the mechanics of the voting process including

19 absentee.

20 Q. Okay.

21 MR. DEVANEY: Next page.

22 THE TECH: (Complying.)

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1 BY MR. DEVANEY:

2 Q. Is this an -- an action item subject

3 to Commission approval?

4 A. So the guidance that we developed for

5 April was approved by the Commission and any

6 additional guidance, public health guidance that we

7 create or refine for the fall would be reviewed and

8 adopted by the Commission.

9 Q. Okay.

10 MR. DEVANEY: And, Henry, please

11 continue. I think we're nearing the end.

12 THE TECH: (Complying.)

13 BY MR. DEVANEY:

14 Q. Same question here for local election

15 official and election instructor training?

16 A. This is part of our agency's ongoing

17 responsibilities so as we institute all the efforts

18 that we just discussed that were approved by the

19 Commission, we have to train the clerks on how to use

20 them.

21 MR. DEVANEY: Okay. Next page.

22 THE TECH: (Complying.)

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1 BY MR. DEVANEY:

2 Q. Okay. Does this document capture all

3 that the Commission has approved for -- in

4 preparation for the August and November elections?

5 A. I believe so. I believe so. I -- as

6 we were putting together this report, we tried to

7 capture everything, so I think it reflects

8 everything.

9 Q. Okay. So to the best of your

10 knowledge, there's nothing else the Commission has

11 approved?

12 A. To the best of my knowledge. I

13 wouldn't put it past me that I forgot something, but

14 to the best of my knowledge, yes.

15 Q. Okay. And to be very clear about it,

16 the Commission hasn't approved anything relating to

17 alternative procedures for the witness certification

18 requirement; is that correct?

19 A. There is the -- the document that

20 we've already discussed that I believe the date on it

21 was March 29 that we had some ideas for voters to be

22 able to accomplish the witness signature process,

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1 including videoconferencing, and that was approved by

2 the Commission.

3 Q. Other than that document nothing else

4 has been approved relating to witness certification;

5 is that correct?

6 A. I don't believe so, no.

7 MR. DEVANEY: Okay. And then, Henry,

8 please pull up the next exhibit, which I think should

9 be answers to interrogatories.

10 Keep going, please.

11 THE TECH: (Complying.) This is

12 Exhibit 10. You probably want Exhibit 11.

13 MR. DEVANEY: Yes.

14 THE TECH: (Complying.) Got you.

15 MR. DEVANEY: And let's go to 12 --

16 no, no --

17 THE TECH: Exhibit 12, got it.

18 MR. DEVANEY: Sorry. Keep going.

19 THE TECH: Do you want another

20 Exhibit?

21 MR. DEVANEY: Yeah. There are

22 answers to interrogatories that are among the

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1 exhibits.

2 THE TECH: Okay. So it probably

3 wouldn't be exhibit -- okay. So maybe let's try --

4 okay. I got it.

5 MR. DEVANEY: Thank you. And what

6 exhibit number is this?

7 THE TECH: This is Exhibit 13.

8 MR. DEVANEY: Okay.

9 (Whereupon, Wolfe Exhibit 13, WEC

10 Response to DNC Plaintiffs' First Set of

11 Interrogatories, was marked for identification.)

12 BY MR. DEVANEY:

13 Q. Ms. Wolfe, were you involved in

14 preparing these answers to interrogatories?

15 A. Yes, I was.

16 MR. DEVANEY: Okay. Henry, please go

17 to Page 2.

18 THE TECH: (Complying.)

19 MR. DEVANEY: Continue on. And go to

20 Page 4.

21 BY MR. DEVANEY:

22 Q. Is all the information in this

Page 114

1 interrogatory -- these interrogatory answers true and

2 correct to the best of your knowledge, Ms. Wolfe?

3 A. To the best of my knowledge, yes.

4 MR. DEVANEY: And Henry, please move

5 document to the left so I can see the full document.

6 THE TECH: (Complying.)

7 BY MR. DEVANEY:

8 Q. You speak, in the answer to Number 3,

9 about the decentralized election administration

10 structure in Wisconsin. Can you expand on that and

11 what you mean by that?

12 A. I would love to. That's one of my

13 favorite talking points. So the State of Wisconsin

14 administers elections at the municipal level, meaning

15 that each city, town, and village has a local

16 election official. Whereas most other states operate

17 elections at the county level. So that might mean

18 that they have 50 to 100 local election officials,

19 many of whom have things like an election department

20 at the county. So it's very different.

21 Our -- our -- our system involves a

22 total of 1,922 local election officials when you take

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1 into account all the municipal election officials and

2 the counties, the 72 counties who also do play a

3 role, albeit different than other states.

4 Q. And you say here, "Local election

5 officials, not the WEC, administer voter

6 registration, absentee ballot voting, and the photo

7 ID requirement."

8 With respect to each of those items,

9 is it correct that local election officials have

10 discretion as to how those requirements are -- and

11 activities are carried out?

12 A. Within the parameters of the

13 statutes. But yes, they are the decision makers.

14 Q. How would you define their

15 decision-making authority?

16 A. So I'll give you an example. Photo

17 ID, for example. If a voter sent back a application

18 for an absentee ballot and they include their photo

19 ID, by statute, the clerk has to look at the

20 expiration date to make sure that it's under the

21 statutory required expiration, that the name matches

22 the name on the poll book.

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1 The statutes further say that the

2 name has to reasonably conform what the poll book

3 says and what's on the photo ID. So right there,

4 that is a piece of discretion they have to take into

5 account when making a decision on whether or not that

6 application is complete and the photo ID is

7 acceptable under statute.

8 And then if the voter's appearing in

9 person, they have to make sure that the photo

10 reasonably resembles the voter. Which again, that's

11 a discretionary point at which the clerk has to make

12 a decision.

13 Q. Okay.

14 MR. DEVANEY: And then, please go to

15 the next page, Henry.

16 THE TECH: (Complying.)

17 MR. DEVANEY: And Ms. Wolfe, I'm

18 sorry that I'm taking a little time, but I just saw

19 this last night, and so I don't have prepared

20 questions. I'm just going through it to see if I

21 have any follow-up for you, so please bear with me

22 for a moment.

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1 THE WITNESS: That's fine.
 2 MR. DEVANEY: Okay. Next page,
 3 please.
 4 THE TECH: (Complying.)
 5 BY MR. DEVANEY:
 6 Q. Looking at the table that's in
 7 response to Interrogatory No. 5, the -- that table
 8 shows the dates on which ballots were sent by clerks'
 9 offices to voters, correct?
 10 A. Yes. That's correct in terms of what
 11 the data shows and when it was entered into the
 12 system. You weren't there when they were issued,
 13 so ...
 14 Q. So for example, on April 1, 2020,
 15 71,405 ballots were sent to voters on that date; is
 16 that correct?
 17 A. That is correct.
 18 Q. Okay. And if we assume the USPS time
 19 of seven days, all those ballots arrived after
 20 election day, correct?
 21 A. Well, again, there's a range so I
 22 don't -- I don't know. There could have been some

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1 that got there in a day, or there could have been
 2 some that got there in five days. So we -- we don't
 3 know.
 4 Q. Right. But if we use the outer limit
 5 of the USPS estimate of seven days, than some -- most
 6 or all of these ballots didn't arrive until after
 7 election day, correct?
 8 A. Sorry. I have no data to confirm or
 9 deny that.
 10 Q. Well, would you agree with me that if
 11 you look at April 4, 14,387 ballots were sent that
 12 those ballots very likely do not arrive in time for
 13 the voters to cast them?
 14 A. I don't know it would be pure
 15 speculation. I don't know. I hope in the future,
 16 though.
 17 Q. Did the Commission investigate this
 18 to determine if these ballots actually arrived in
 19 time for voters to cast them?
 20 A. Without intelligent mail barcodes,
 21 there's no way to know. Other than the voter
 22 self-reporting to our office, there's no way that we

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1 would know.
 2 Q. Ms. Wolfe, is this an unusually high
 3 number of ballots to be sent out in the last week
 4 before an election, in your experience?
 5 A. I'm sure we have that data somewhere,
 6 but I don't know it off the top of my head. I'm -- I
 7 don't know how that compares.
 8 Q. That's not something that you've
 9 looked at?
 10 A. I may have, but I don't -- I don't
 11 recall.
 12 Q. Is it true that the reason for this
 13 large number of ballots is because of the surge in
 14 absentee voting that you saw in April?
 15 A. I think the percentage is certainly
 16 different than we've seen in previous elections of,
 17 you know, how many voters were still participating.
 18 Yes, I mean, the volume of requests overall by mail
 19 was just larger every day because it was more than
 20 we've ever issued by mail before.
 21 Q. And -- and given that we're expecting
 22 a continued high rate of voting by mail for the

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1 November election, would you also agree that we're
 2 going to see similar numbers in November of large
 3 numbers of ballots going out to voters in the last
 4 week before the election?
 5 A. It would be guessing. If we use this
 6 as a bar, and if this trend holds true, then we could
 7 see similar percentages; but, again, we're planning
 8 for the -- the deviate because we don't know.
 9 Q. Using the April experience, it's fair
 10 to infer that there will be a large number of ballots
 11 sent to voters the week before the November election;
 12 is that correct?
 13 A. I -- I -- I really wish I knew, but I
 14 don't know what voter behavior will look like for
 15 November. But if this holds true, then the
 16 percentages would hold true too.
 17 MR. DEVANEY: Okay. Next page,
 18 please, Henry.
 19 THE TECH: (Complying.)
 20 MR. DEVANEY: And please move it to
 21 the left. Okay. Next page. Okay. Next page.
 22 Okay. Next page.

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1 BY MR. DEVANEY:
 2 Q. Interrogatory No. 13 says, "Describe
 3 all steps you are taking to help ensure that early
 4 in-person voting and election day in-person voting
 5 opportunities are available to voters throughout
 6 Wisconsin, including but not limited to steps you are
 7 taking to ensure that voters in Milwaukee, Madison,
 8 Green Bay, Racine, Kenosha, and other high-volume
 9 election jurisdictions have a sufficient number of
 10 polling locations and a sufficient number of poll
 11 workers to staff those locations and minimize the
 12 waiting times to vote on November 3, 2020."
 13 And the response is, "Please see WEC
 14 Defendants' June 25, 2020, statement for steps the
 15 WEC is taking to support local election officials in
 16 their efforts to staff early in-person voting and
 17 election day in-person voting opportunities."
 18 Is it fair to say, based on that
 19 response, all that the Commission is doing in this
 20 regard is summarized in the June 25 report?
 21 A. Yes. Yes, but we always do, too --
 22 if a jurisdiction reports an issue to us, and they

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1 have certain, you know, special circumstances or
 2 something that they need help with, I mean, we would,
 3 you know, work with them on individual needs too.
 4 That may not be reflected in the -- the statewide
 5 report.
 6 Q. Okay. But other than that important
 7 exception, on a statewide basis, all the Commission
 8 is doing to prepare for the November 3 election as
 9 described here, is set forth in the June 25 report,
 10 correct?
 11 A. I -- I'm -- I guarantee you there
 12 will be additional things that we have to do. We --
 13 there's -- there's no finish line here. So there's
 14 going to be new information, new challenges that come
 15 our way that we have to probably develop or do things
 16 that we don't even know about yet. So -- that
 17 happens every election.
 18 So this certainly, by no means, is
 19 the -- the end of our list. I think it's just the
 20 starting point that we know of looking forward.
 21 Q. Okay.
 22 MR. DEVANEY: And the next page,

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1 please, Henry.
 2 THE TECH: (Complying.)
 3 BY MR. DEVANEY:
 4 Q. Okay. And then Interrogatory 15
 5 states, "State whether you are aware of any incidents
 6 of people voting unlawfully in connection with the
 7 April 7 or May 12 elections, and if so, identify and
 8 describe each such incident of which you are aware."
 9 And the answer says, "The WEC has
 10 taken no enforcement action or made any referrals to
 11 law enforcement regarding any individual voting
 12 unlawfully."
 13 Is it true that the Commission is not
 14 aware of any person vote -- voting unlawfully in
 15 those elections?
 16 A. I don't believe we have -- no, we
 17 don't have -- the Commission, like it says, has not
 18 made any referrals or taken any action, but the
 19 sentence says -- second sentence says we have not yet
 20 completed the audit that's required for the April 7
 21 and the May 12 election.
 22 Q. But my question for you is: Has

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1 anyone brought to the Commission's attention any
 2 alleged act of someone voting unlawfully in either of
 3 those elections?
 4 A. To the Commission as a body, no, not
 5 that I'm aware of, no.
 6 Q. Okay. And you're not aware of any
 7 voting fraud in connection with those two elections;
 8 is that correct?
 9 A. No, I -- you know, every election
 10 people will call our office and make allegations, but
 11 I'm not aware of any substantiated information that
 12 we're aware of, no.
 13 Q. Okay. And I am just about done.
 14 I -- I know Mr. Sherman has some questions, and I
 15 want to honor his time. There is one exhibit I did
 16 want to ask you about, and I'm going try to minimize
 17 my screen so I can find it. Bear with me one second
 18 here.
 19 MR. DEVANEY: Well, I don't want to
 20 hold things up. I -- I may, at the very end, ask one
 21 question about this document, if I can find it. But
 22 that's all I have right now, Ms. Wolfe. And I -- I

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1 much appreciate your -- your time.
 2 THE WITNESS: Thank you.
 3 MR. SHERMAN: Does it make sense to
 4 take a five-minute break, and then we can go to the
 5 next segment?
 6 MR. GAHNZ: Sure.
 7 MR. SHERMAN: All right.
 8 THE VIDEOGRAPHER: Stand by, please.
 9 So the time is 12:36 p.m. We are off the record.
 10 (Brief recess.)
 11 THE VIDEOGRAPHER: Okay. We are back
 12 on the record. The time is 12:43 p.m.
 13 MR. SHERMAN: For the record, John
 14 Sherman. I'm plaintiffs' counsel in Gear v.
 15 Bostelmann, 20-cv-278.
 16 EXAMINATION
 17 BY MR. SHERMAN:
 18 Q. I'll say good morning, Ms. Wolfe,
 19 since it's still morning in Wisconsin. It's -- it's
 20 afternoon here, but it's morning over there still.
 21 I'm going to try to -- and thank you, again, for
 22 being with us today. And I know it's a holiday, so

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1 I'm going to trying to be as quick and efficient as
 2 possible.
 3 I have -- I have fewer questions --
 4 and just -- I have a few just -- initially just some
 5 follow-up questions to what Mr. Devaney was asking
 6 you.
 7 Do you have any idea how many voters
 8 contacted municipal clerks' offices to say that their
 9 ballots had not arrived or not arrived on time?
 10 A. I'm sorry, I would -- I would not
 11 have access to that information.
 12 Q. And did -- did the Commission
 13 tabulate how many people, how many voters called or
 14 E-mailed to say that their ballots had not arrived in
 15 the mail on time or at all?
 16 A. We have records of our E-mails, which
 17 were provided, so we would have those contacts.
 18 Q. You don't have -- you don't have a
 19 total, though, of the number of voters?
 20 A. I do not, no.
 21 Q. Is that something that you would be
 22 able to tabulate?

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1 A. In terms of E-mails --
 2 MR. GAHNZ: We provided the -- excuse
 3 me, we provided those E-mails as part of our
 4 discovery.
 5 MR. SHERMAN: Okay. All right. It
 6 came in last night, I apologize. So --
 7 MR. GAHNZ: Oh, that's all right. We
 8 were on a very short time frame.
 9 MR. SHERMAN: I understand.
 10 BY MR. SHERMAN:
 11 Q. So just a couple other questions
 12 about the April 7 absentee voting report that was
 13 published on May 15.
 14 So do you have any current
 15 information on the USPS investigation into the
 16 Oshkosh and Appleton's mail-in voting problems?
 17 A. I do not. We only have the
 18 information we reported.
 19 Q. And same question with respect to Fox
 20 Point, do you -- did you get a final conclusion as to
 21 what happened?
 22 A. No, we -- we did not.

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1 Q. Are you aware that some city clerks'
 2 offices are still receiving absentee ballots back as
 3 undeliverable, even some 11, 12 weeks after the
 4 April 7 election?
 5 A. I don't have any specific -- not in
 6 that timeline that you just gave, I don't have any
 7 specific examples, no.
 8 Q. So no -- no clerks are currently
 9 telling you that they're still receiving absentee
 10 ballots back as undeliverable at this time?
 11 A. From the April 7 election?
 12 Q. Yes, the April 7 election. Sorry.
 13 A. I have not received any context along
 14 those lines, no.
 15 Q. And you're -- you're familiar -- we
 16 don't need to look at the report again, but you're
 17 familiar with the software upgrade issue that
 18 happened in Milwaukee that led to, approximately,
 19 somewhere over 2,000 absentee ballots not being sent
 20 out?
 21 A. Yes.
 22 Q. Have any changes been made to prevent

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1 that from happening going forward in the -- in the
 2 August and November elections?
 3 A. Absolutely, yes. So like I talked
 4 about earlier, producing tools to allow us to make
 5 sure that ballots have gone out, further
 6 visualization in the system, especially for large
 7 jurisdictions, to be able to make sure that
 8 everything that they -- they intended to send
 9 actually makes it into an envelope and -- and is
 10 sent. And I'm sure we'll continue to do additional
 11 work to help them develop processes, best practices,
 12 so that they can ensure that every ballot is -- is
 13 issued as intended. In addition to the intelligent
 14 mail barcodes, which will give us more of a insight
 15 into those ballots too, and making sure that they hit
 16 the mail stream; and if they don't, like we discussed
 17 before, we can work with the clerks for them to issue
 18 a replacement.
 19 Q. Understood.
 20 MR. SHERMAN: Could we go to Gear
 21 Plaintiffs' Exhibit 4?
 22 THE TECH: (Complying.)

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1 absentee ballot online at myvote.wi.gov, correct?
 2 A. Yes.
 3 Q. And that includes permanent and
 4 temporary overseas voters as well?
 5 A. Yes, that's correct.
 6 Q. And this method of accessing a
 7 mail-in ballot, that's available through
 8 myvote.wi.gov, right?
 9 A. Yes.
 10 Q. Is it available through any other
 11 portal, website, or system?
 12 A. No, it's -- it's our state system,
 13 as -- as -- it's prescribed by state law, that we
 14 have this opportunity available.
 15 Q. Okay. And how long has Wisconsin
 16 offered this absentee ballot delivery method to
 17 military and overseas voters?
 18 A. Now, that is a quiz. I don't -- I
 19 don't know when the statute was passed, but I know
 20 that we implemented the first iteration of the MyVote
 21 ballot delivery tool in 2012 using federal funding
 22 for that purpose.

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1 (Whereupon, Gear Plaintiffs' Exhibit
 2 4, MyVote Wisconsin Manual, was marked for
 3 identification.)
 4 MR. SHERMAN: Thanks very much.
 5 BY MR. SHERMAN:
 6 Q. Ms. Wolfe, do you recognize this
 7 document?
 8 A. Oh, boy, this is a blast from the
 9 past, yeah, yes.
 10 Q. Is this the current MyVote Wisconsin
 11 manual?
 12 A. I believe so. I believe it's the
 13 most current version.
 14 Q. Okay.
 15 MR. SHERMAN: And could we just -- I
 16 don't know if we'll need to use this; but, Henry, if
 17 you could, could we just go to Page 20, just to have
 18 it for reference.
 19 THE TECH: (Complying.)
 20 BY MR. SHERMAN:
 21 Q. So in -- in Wisconsin, a military or
 22 overseas voter can access and download a mail-in

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1 Q. Okay. Thank you.
 2 And has it always been -- it's
 3 always -- the whole time, it's been a part of
 4 myvote.wi.gov, correct?
 5 A. I believe so, but that would predate
 6 me a little if -- if there were other methods,
 7 through E-mail or something else, that we were doing
 8 prior to that, but I -- I believe -- I believe that's
 9 always been through MyVote.
 10 Q. When was -- when was the MyVote
 11 portal created?
 12 A. 2012.
 13 Q. 2012, okay.
 14 So does a military or overseas voter
 15 need to request the ability to access and download
 16 their mail-in ballot online at myvote.wi.gov when
 17 requesting that ballot?
 18 A. Well, it's all part of one workflow.
 19 So the voter would go to MyVote. If they're already
 20 registered, they put in their name and date of birth;
 21 they find their record. They would indicate that
 22 they want a ballot; and that, as part of that

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1 electronic request form, they can say they want their
 2 ballot online. And then it would lead them right
 3 into their ballots once they -- they submitted that
 4 request.
 5 Q. And the military or overseas voter
 6 has a few choices for delivery methods, correct?
 7 A. Yes.
 8 Q. And a regular domestic civilian voter
 9 in Wisconsin can only request mail delivery through
 10 the MyVote portal; is that correct?
 11 A. That is correct.
 12 Q. Can a military or overseas voter use
 13 a EL-121 form, the absentee ballot application, to
 14 request online access and downloading of the mail-in
 15 ballot?
 16 A. They could. It would be really
 17 unnecessary to do. You -- you have to go to the site
 18 to do it; we can't issue you an online ballot on
 19 paper. So, I mean, they certainly could.
 20 MR. SHERMAN: Could we go --
 21 actually, Henry, could we switch to Exhibit 7,
 22 please?

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1 THE TECH: (Complying.)
 2 (Whereupon, Gear Plaintiffs' Exhibit
 3 7, EL-121 Absentee Ballot Application Form, was
 4 marked for identification.)
 5 MR. SHERMAN: Is there anywhere -- if
 6 could you put it just to -- to the left a little bit
 7 so we can see the full document. I'm not sure what
 8 people are seeing on their screen.
 9 THE TECH: (Complying.)
 10 MR. SHERMAN: Thank you.
 11 BY MR. SHERMAN:
 12 Q. Is there an option on the -- sorry,
 13 Ms. Wolfe, do you recognize this document?
 14 A. (No audible response.)
 15 Q. Ms. Wolfe, do you recognize this
 16 document?
 17 A. Yes.
 18 Q. Okay. Sorry, I didn't hear you.
 19 And what is it?
 20 A. It's the Wisconsin application for
 21 absentee ballot.
 22 Q. And is there an option on this

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1 application form for someone to select online access
 2 and download it?
 3 A. No, but this -- I mean, this is not
 4 -- nobody uses this form. Especially for military
 5 and overseas voters, they're going to use the FPCA or
 6 the FWAB, which are federal forms to be able to
 7 interact with their clerk, and then their clerk gives
 8 them that information.
 9 Q. And for the record, the FPCA is the
 10 Federal Postcard Application?
 11 A. Yes.
 12 Q. And on the Federal Postcard
 13 Application, you can indicate that you want online
 14 access and downloading abilities?
 15 A. Correct, but, again, nobody has to
 16 grant you that permission. You can just show up at
 17 the website and do it. So requesting you want an
 18 online ballot is a little kooky.
 19 Q. Understood. Just trying to be
 20 thorough.
 21 A. Yes.
 22 Q. And so just to be that much more

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1 thorough, so you can use the Federal -- the FWAB or
 2 the F-W-A-B. That's the Federal Write-In Absentee
 3 Ballot, correct?
 4 A. Yes.
 5 Q. And you can use that to request an
 6 absentee ballot be delivered by online access and
 7 downloading?
 8 A. Well, you're not requesting it be
 9 delivered. It has a E-mail, slash, online option,
 10 and so if the voter checked that, the clerk would
 11 contact the voter and say, "Hey, you wanted it by
 12 E-mail/online," which we've had conversations with
 13 FWAB, we'll call it, and then the -- the voter would
 14 indicate how they want their ballot. And if they say
 15 online, then the clerk tells them, "Go to MyVote."
 16 The clerk can't get an online ballot for the voter.
 17 The voter has to go there and get it. If they don't
 18 hear back from the voter, then they would E-mail the
 19 voter the ballot.
 20 Q. Understood. You've said a little bit
 21 about this, but I'm going to ask you just more
 22 comprehensively. So if such a request is made for

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1 online access and downloading of the mail-in ballot
2 on myvote.wi.gov, what does the municipal clerk's
3 office need to do, if anything, when it receives that
4 request?

5 A. Nothing. They do nothing. So it's
6 all a voter-initiated process. The voter goes to
7 MyVote. They get their ballot, and then we issue it
8 on the clerk's behalf through the MyVote system.
9 There is a lot more things I think are very cool
10 about how technology makes that happen, but we create
11 a ballot for the voter in the MyVote system and issue
12 it to them.

13 Q. Is the ballot automatically generated
14 using the record in WisVote?

15 A. Yes, uh-huh.

16 Q. Is there anything that the Wisconsin
17 Elections Commission needs to do as distinguished
18 from the municipal clerk's office?

19 A. Yes, a great deal of things, so we
20 have one of the most sophisticated geocoding systems
21 in the country in terms of our voter records. And so
22 when a voter registers, we geolocate them which means

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1 Q. Okay. So the only -- the only
2 difference -- sorry, I'll retract that.

3 So you've essentially created a
4 system where military and overseas voters can
5 generate their own ballot automatically, and
6 municipal clerks and the Wisconsin Elections
7 Commission don't need to do any work to request --
8 don't need to do any additional work to fulfill that
9 request?

10 A. I mean, I think we probably make it
11 look easy. There's a lot of work that has to happen
12 to make that work. I mean, you have to be putting in
13 the context and the candidates and the nomination
14 papers and geocoding things and all of that, but
15 there's no -- it's not pending, I guess, if that's
16 what you're asking. There's no, you know, additional
17 step where the clerk has to go in stand in a PDF as a
18 ballot or something. We're able to generate it using
19 data that we have.

20 Q. Right. So that was the point I was
21 trying to just ask you about. There's no -- after
22 you've done the geocoding, after you've uploaded the

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1 that we're also creating a string of what we call
2 district combos that tells us what district and ward
3 boundaries their ping falls into, and then based on
4 that, we can pull in the contest and candidates that
5 are also in the system that correlates with that --
6 with that string of numbers to produce electronic
7 representation of the ballot.

8 Q. And all of that happened
9 automatically upon a request for online access and
10 downloading, correct?

11 A. I lost you there for a second.

12 Q. Let me rephrase the question. So if
13 an individual military or overseas voter requests
14 online access and downloading, is there anything
15 additional that you -- that the Wisconsin Elections
16 Commission or the clerk's office needs to do, or is
17 that ballot just automatically generated?

18 A. The ballot is -- ballot is
19 automatically generated because it -- for that
20 category of voters, they're exempt from the photo ID
21 requirements, so there's nothing that the clerk has
22 to do to approve it.

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1 candidates and all of that, there's no additional --
2 I'm -- I acknowledge that's a lot of work, but
3 there's nothing additional on top of that that you
4 need to do for individuals who are requesting a
5 ballot in that way?

6 A. Yes -- well, not for UOCAVA voters
7 because, again, they're exempt from photo ID.

8 Q. Understood. Okay. So how -- how
9 does a military or overseas voter access their ballot
10 on myvote.wi.gov?

11 A. So they go in through -- there is a
12 couple of different doors you could access through
13 vote absentee, or there's one for military and
14 overseas voters with tap. They enter their name and
15 their date of birth, and they search for themselves.
16 If they are not registered already, they are going to
17 need to do that, especially our overseas voters. So
18 they would have to register to vote, which they may
19 be able to do online if they have a State of
20 Wisconsin product, which isn't the case usually for
21 our overseas voters, or register by mail or however
22 they register.

35 (Pages 137 to 140)

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1 Once they are registered, they find
 2 their record, then they can go in, start the request
 3 process, so they would say, you know, I want -- what
 4 election they want a ballot for. They would confirm
 5 their address and that they're registered to vote at
 6 that address, that they haven't moved, that they are
 7 eligible, and then they would select how they want to
 8 receive their ballot. And if they select online,
 9 once they press submit on their electronic request,
 10 it will ask them, "Do you want your ballot now or do
 11 you want your ballot later?"
 12 And if they say now, it will bring
 13 them into the portal that produces their ballots.
 14 They will see their ballot on the screen. They can
 15 if they want go through and mark it, or they can
 16 print the blank ballots, and all the ballot delivery
 17 materials, so the absentee certificate, the return
 18 instructions that have the dates and their clerk's
 19 information because the ballot has to go back to the
 20 clerk, and information about how to vote in the
 21 ballot, have it witnessed, how to seal it in the
 22 envelopes to return it, so that they still preserve

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1 Q. All right.
 2 A. And the postage.
 3 Q. And the postage, correct. All right.
 4 I was going to ask you about that so we covered that.
 5 And, again, there's nothing --
 6 there's nothing additional that the municipal clerk's
 7 office has to do to facilitate the actual online
 8 access and downloading of the ballot, correct?
 9 A. Not the online access but maybe we'll
 10 get there. I don't mean to jump ahead of you, but
 11 they will have to remake that ballot once it comes
 12 back.
 13 Q. That's coming. Right. But in terms
 14 of the access and the downloading, you know, the
 15 municipal clerk's office doesn't need to do anything
 16 additional?
 17 A. That's correct.
 18 Q. All of those steps that the voter
 19 then takes are documented as part of that voter's
 20 official record in the statewide database.
 21 A. Understood.
 22 Q. What if a military or overseas voter

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1 their right to -- to secrecy. And they printed that
 2 off, they mark their ballot and then they would have
 3 their witness and then sign the certification and
 4 send it back to their -- their clerk.
 5 Q. Thank you. Certify -- I'm sorry, I'm
 6 getting some feedback. The certification has a label
 7 on it that is specific to the voter?
 8 A. It's been a while. I -- I believe
 9 so. It -- it's not a label because it's us printing
 10 off the certification. They have to have their own
 11 envelope. We tried an origami envelope. It wasn't a
 12 good idea. And they -- they are given instructions
 13 about this is who your clerk is, this is their
 14 address, you know, you're going to have to put their
 15 information on your -- your return envelope.
 16 Q. Understood. And that information is
 17 drawn directly and automatically from WisVote,
 18 correct?
 19 A. Yes.
 20 Q. All right. And so basically you
 21 supply everything except the envelope, correct?
 22 A. Yes.

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1 requests that their ballot be delivered by mail but
 2 it doesn't come in the mail on time, can they request
 3 a replacement ballot by online access and downloads
 4 from myvote.wi.gov?
 5 A. Yes, the statutes allow anybody to
 6 make a request for up to three ballots if they need
 7 to be reissued.
 8 Q. In those circumstances does a
 9 municipal clerk have the ability to change the
 10 requested delivery method in myvote.wi.gov, or does
 11 the initial request have to be canceled, and then the
 12 voter fills -- fills out a new request?
 13 A. The initial request has to be
 14 cancelled so the voter would need to contact their
 15 clerk, let them know the situation, and then the
 16 voter would have to go to MyVote to get their online
 17 ballot.
 18 Q. Could the site be reprogrammed such
 19 that a municipal clerk could respond to a request and
 20 just cancel it, just -- excuse me, and just change
 21 the delivery method?
 22 A. Well, again, you know, I'm -- I'm not

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1 trying to get hung up on the details here, but I
 2 guess that's what I -- why I live. It wouldn't make
 3 any sense for the clerk to go in and change the
 4 delivery method online because the voter has to go
 5 online to do it, so no.

6 Q. Okay. I understand -- I understand
 7 your response. Bear with me. I'm just skipping some
 8 stuff we already discussed.

9 What is the deadline to request a
 10 replacement absentee ballot?

11 A. Well, military voters have their own
 12 set of deadlines, so military voters have until
 13 election day to make their request for a ballot so
 14 that would include a replacement ballot, but that's
 15 just our military voters. Regular voters, most of
 16 them, have until the Thursday before the election.

17 Q. Okay. So that -- the same cutoff for
 18 an initial request of an absentee ballot applies for
 19 replacement ballots, as well?

20 A. Yes, that's correct.

21 Q. Is it more burdensome or less
 22 burdensome for a municipal clerk's office staff

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1 member to deliver a replacement mail-in ballot via
 2 online access and downloading or by mail delivery?

3 A. I don't have an answer for that,
 4 because I'm not sure if they looked at it
 5 holistically, from start to finish. I'm not sure
 6 what, you know, value they'd ascribe to it.

7 Q. Well, discounting for the moment --
 8 and we'll get there, I will ask you about.
 9 Discounting what has to what happen when the ballot
 10 comes in, on the front end, with delivery, is it
 11 easier or harder to deliver a replacement mail-in
 12 ballot by mail or by allowing the voter to access it
 13 online through the portal?

14 A. They don't have to do anything when
 15 they're issuing -- when it's issued online. They
 16 would have to get a ballot, put it in an envelope,
 17 print a label to be able to send it by mail, so ...

18 Q. And I think we covered this before,
 19 but clerks don't cover the postage, right? The voter
 20 has to cover the postage when it's accessed and
 21 downloaded through myvote.wi.gov?

22 A. Yes, in most cases.

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1 Q. It --

2 A. There is -- there's a federal indicia
 3 that is available for -- through the Federal Voting
 4 Assistance Program that some voters might utilize to
 5 get their overseas ballot back. But the clerk does
 6 not provide that postage, no.

7 Q. Understood.

8 So what role, if any, does WisVote
 9 play in this online access and download process
 10 through myvote.wi.gov?

11 A. Well, you know, MyVote, if you think
 12 about it is just kind of the -- the -- the pretty
 13 face of WisVote. So it is -- you know, WisVote is
 14 where all the data is, where everything happens, is
 15 created. MyVote is just the user interface for
 16 voters to be able to interact with that data.

17 So WisVote plays all the roles in
 18 really facilitating the checking of that voter record
 19 to make sure that that voter is lawfully registered
 20 in the system, has provided all the information.
 21 It's, also, you know, it's going to make sure that we
 22 have a good address for that voter and that we know

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1 what contests and candidates they are eligible to
 2 vote for so that we can create a ballot for them.

3 And if we're not sure, we don't
 4 guess. We have to go in and manually fix that
 5 address to make sure that the right contests and
 6 candidates pull in. So that's something the clerks
 7 have to do once in a while, is go in and fix those
 8 addresses, if the voter's address isn't showing up as
 9 validated.

10 And then it tracks, you know, that
 11 ballot being issued, because even if the voter
 12 requests a replacement ballot, we see those
 13 transactions. And, of course, only one of those is
 14 going to be counted, so we have unique identifiers
 15 there. And then also creating things like the --
 16 the -- you know, essentially the label or the
 17 information, like the clerk return information,
 18 for -- for that certificate, as well.

19 Q. I wanted to (inaudible) one thing,
 20 because you said that the replacement ballot has a
 21 unique identifier --

22 A. I don't know if it's just me, but I

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1 can't -- I keep losing you. I can't hear you.
 2 MR. GAHNZ: Yeah, Attorney Sherman,
 3 you're breaking up.
 4 THE TECH: Yeah, yeah, you are, yeah.
 5 I mean, it -- it rarely happens, but it happened this
 6 time. You may want to repeat that.
 7 MR. SHERMAN: Right. There -- yeah,
 8 there was one other time I got feedback. I think
 9 I'll just wait it out when that happens. Can you
 10 hear me now clearly?
 11 THE WITNESS: Yes.
 12 MR. SHERMAN: I'm not sure what
 13 happened there. Okay. I'll ask the question again.
 14 BY MR. SHERMAN:
 15 Q. So I just wanted to zero in on one
 16 thing you had said.
 17 So when a replacement ballot is
 18 issued, that's assigned a new unique identifier, and
 19 the prior ballot that was mailed won't be counted,
 20 correct?
 21 A. It's a little more complicated than
 22 that. But we know the -- the clerk will know the

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1 difference based on the ballot's issuance number that
 2 will be a part of the -- the data for what was
 3 issued. So, you know, there -- there's kind of a --
 4 there's a process that they have to go through.
 5 So if, let's say, they issued more
 6 than one ballot, then whatever one comes back by
 7 election day gets counted. Now, if they both came
 8 back by election day, then they would count the
 9 second one that was issued because the first one had
 10 been deactivated.
 11 So there can be some complexities to
 12 that; but, yes, bottom line, we know the difference
 13 between which ballot and which one should count.
 14 Q. Is there any fraud at issue if both
 15 ballots come back, or that's just considered the
 16 voter was trying to cast their ballot?
 17 A. The law allows somebody to request up
 18 to three ballots. If they make a mistake, if they
 19 change their minds, they can get a separate ballot.
 20 And, you know, technology ensures that, you know,
 21 only one is going to be counted. When those ballots
 22 come back, they have to mark that in statewide

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1 system. And if they've already done that, they're
 2 not going to be able to do that again, so ...
 3 Q. Understood. So there's no fraud
 4 issue. The system prevents that from happening,
 5 correct?
 6 A. There are many safeguards in place in
 7 the statewide system.
 8 Q. Great. So -- okay. So now, the
 9 voter is accessing downloaded mail-in ballots using,
 10 you know, the absentee ballot and the certificate
 11 using myvote.wi.gov. What does that voter need to
 12 actually do to cast the ballot once they've
 13 downloaded it?
 14 A. Once they download the ballot, they
 15 are going to need to print it off. So all the
 16 ballots have to come back by mail. No ballots can be
 17 returned electronically under state statutes, and so
 18 they'll have to print it and mark it in the presence
 19 of a witness. And then the voter and the witness are
 20 going to have to sign the certificate.
 21 And then to get the ballot back, they
 22 are going to need two envelopes. One to put the

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1 ballot itself in, and then they're going to seal
 2 that. And then they're going to take that
 3 certificate that the voter and the witness just
 4 signed, they are going to put that with they envelope
 5 that contains the ballot, and they're going to put
 6 both those things into a carrier envelope that they
 7 address to their municipal clerk. So it has to go
 8 back to the right clerk out of 1,850. And they have
 9 to put postage on it and send it back.
 10 Q. Understood. And once those ballots
 11 are cast and submitted, how are they processed and
 12 counted?
 13 A. So once they are received by the
 14 clerk -- the reason that they're in two envelopes is,
 15 just like a regular absentee ballot, the clerk is
 16 going to open the outer ballot, but they don't want
 17 to actually see the -- or the outer envelope, but
 18 they don't want to actually see the -- the ballot.
 19 And so they are going to make sure that the
 20 certificate is complete and that they have everything
 21 they need, and then that ballot is going get sent
 22 down with all the other absentee ballots to the

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1 polling place to be processed and counted on election
 2 day.
 3 And on election day, those ballots,
 4 because they're not on official ballot stock, they're
 5 not the right size, they're just on regular printer
 6 paper, they have to be remade. And the statutes and
 7 our training outline the process for the election
 8 inspectors to remake the ballots so that it can be
 9 counted by the voting equipment on election day.
 10 Q. Thank you. So shifting just
 11 slightly, assuming it were lawful or the -- the
 12 Commission were ordered by the Court to extend those
 13 means of accessing and downloading a mail-in absentee
 14 ballot to regular domestic civilian absentee voters,
 15 what would the Commission need to do to make that
 16 happen?
 17 A. So there would need to be very
 18 significant development to both the WisVote and the
 19 MyVote system, and probably the most significant
 20 change would be that we would have to find away to
 21 incorporate photo ID in that process. So it couldn't
 22 be the seamless process we just talked about, where a

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1 voter just goes in, makes their request, and then is
 2 able to go into their ballot. There would have to be
 3 a measure in there where the clerk verifies their
 4 photo ID and makes sure that they're able to access a
 5 ballot. And, of course, the law would have to be
 6 changed because it doesn't allow for electronic
 7 delivery to anybody beyond UOCAVA voters.
 8 Q. Right. So again, taking that off the
 9 table, assuming it's lawful or ordered by a court, is
 10 the only difference, mechanically, that a municipal
 11 clerk's office staff member would need to review a
 12 photo ID submitted by the regular voter?
 13 A. I don't have a comprehensive analysis
 14 of all the differences, but that's the -- the largest
 15 one that I can sort of identify at this moment and --
 16 and not a workflow that we've ever had in place. So
 17 we don't have any of that framework developed.
 18 Q. Understood. So you -- you could
 19 keep -- could you keep the workflow separate for
 20 regular voters and UOCAVA voters?
 21 A. I think, you know, regardless, they
 22 would be separate workflows. There would, you know,

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1 be different coding and functionality that we'd have
 2 to develop.
 3 Q. Okay. What -- so you suggested that
 4 you would need to reprogram myvote.wi.gov. What --
 5 what would that entail?
 6 A. So that would entail -- well, MyVote
 7 and the WisVote database as well for -- first of all,
 8 when a voter looks themselves up, we have to make
 9 sure they are registered, and then as they are going
 10 through the absentee request process, they -- they
 11 would have to be able to upload their photo ID which
 12 would then have to be sent to the clerk to be able to
 13 review and then that would -- you know, the -- the
 14 clerk has 24 hours to be able to issue ballots so
 15 something similar to that before the voter would be
 16 able to complete actually getting their ballot
 17 electronically.
 18 So right now it's a one-step process,
 19 and we don't -- we would have to develop what a
 20 two-step process would look like for the voter to be
 21 able to come back and finish.
 22 Q. Do you have any sense of how hard it

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1 would be for your IT staff members to accomplish
 2 that?
 3 A. It would -- I -- I -- you know, I am
 4 very intimately involved with what it would take to
 5 make that happen, and it would be a -- a huge task
 6 especially from a security perspective. With
 7 cybersecurity concerns as they are with, you know,
 8 election systems, it's nothing you would want to --
 9 to rush. It's something that, you know, would really
 10 have to be very, very thoughtful and careful about
 11 how we developed it, tested it, launched it, were
 12 able to monitor it, monitor traffic to make sure that
 13 only eligible voters were able to access it. So it
 14 would -- we would have to do a full analysis, but it
 15 would be a very significant IT project.
 16 Q. So I think you might have said this
 17 before but just to double-check, when a military and
 18 oversea -- or overseas voter accesses their ballot
 19 through myvote.wi.gov, they put in the last four of
 20 their social, correct?
 21 A. Yes, that's correct.
 22 Q. In addition to their name and date of

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1 birth?

2 A. That's correct, yes.

3 Q. Do you consider that system secure as

4 to UOCAVA voters accessing and downloading their

5 ballots?

6 A. Yes, and there's only, you know, one

7 point of that data exchange, right, for them because

8 there isn't that intermediary step but, yes, we -- we

9 consider it to be very secure.

10 Q. Do you have any -- so what are the

11 additional cybersecurity concerns that you suggest

12 you have if they were to be extended to regular

13 absentee voters?

14 A. So I guess simply put, and again,

15 I -- I haven't done a full analysis of this, and the

16 Commission certainly hasn't taken a position on this.

17 This is just my technical expertise which I'm not

18 sure I should be getting into. I'm on behalf of the

19 Commission. But I -- it would -- it would require

20 multiple transactions of personally identifiable

21 information between the database and the website. It

22 would also widen the pool of people who are able to

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1 access it. Right now it's a very small pool of

2 people and so there's that human element on the clerk

3 side. Out of only 1850 local election officials,

4 they are able to see if travel is unusual, especially

5 for the online portal. If that was brought in, we'd

6 have to -- to figure out additional monitoring to

7 help us establish, you know, using machine learning

8 to establish what a baseline would look like and

9 then to help us establish what anomalies would look

10 like as well.

11 Q. Don't the same -- sorry, I'm breaking

12 up with the -- don't the same data transactions

13 between MyVote and WisVote occur when a military or

14 overseas voter uses the online access and downloading

15 tool?

16 A. Just once. So it's going to use that

17 API one time to make that comparison when we are

18 verifying who they are. If you have that

19 intermediary step, where they're going to have to

20 come back, you're -- you're introducing another touch

21 point with the API in exchanging that data.

22 Q. And when you say "when they come

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1 back," you mean after the photo ID verification?

2 A. Yes, that's correct plus the

3 transmission of the photo ID.

4 Q. Okay. Understood. You -- you said

5 that you already had some upgrades planned for MyVote

6 and WisVote for August and November elections,

7 correct?

8 A. Yes.

9 Q. Are these changes as complicated or

10 roughly the same as what we proposed in this -- in

11 this case as an extension of this online access and

12 downloading functionality to all regular voters?

13 A. They are fairly complex as well.

14 They don't require as much of a change in how WisVote

15 and MyVote interact together, but they are -- they

16 are significant IT projects, but they are -- they are

17 in some ways apples and oranges, but --

18 Q. Understood. Do you -- do you think

19 it would be comparable in terms of the time it would

20 take to reprogram both MyVote and WisVote, leaving

21 aside any analytics that you would have to do?

22 A. Potentially, but that would mean we

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1 couldn't do the things that we are planning to do

2 now. You know, we're a very, very small agency that

3 has already been working around the clock for six

4 months, so, you know, we don't have any resources

5 that haven't been leveraged to their point of

6 exhaustion.

7 Q. I understand. And I'm sympathetic.

8 Do you ever hire vendors for computer or IT software

9 upgrades?

10 A. We -- we do, but we are also -- you

11 know, have parameters with state procurement in -- in

12 hiring especially now. There's a state hiring freeze

13 on our ability to bring in anybody. And then, of

14 course, with the sensitivity of cybersecurity in

15 elections, we have to be incredibly selective of who

16 is able to have access to our source code.

17 Q. Understood. Do you know of any

18 instances where a ballot was fraudulently downloaded

19 from myvote.wi.gov by someone who was unauthorized to

20 receive it?

21 A. No, I'm not aware of anything like

22 that.

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1 Q. Do you know of any instances where a
 2 ballot was fraudulently downloaded and voted?
 3 A. No, I'm not aware of anything like
 4 that.
 5 Q. And to -- to the extent you've
 6 reached some or any conclusions on this -- I know it
 7 was only issued on Monday -- how has the One
 8 Wisconsin Institute litigation affected this means of
 9 absentee ballot delivery, if at all?
 10 A. It hasn't -- well, we're still
 11 analyzing the decision and determining next steps,
 12 but that has to do with E-mail and fax transactions
 13 to regular voters. So, I don't foresee a major
 14 change in those workflows as they exist.
 15 Q. Okay. Last question just on this
 16 subject, leaving aside the legality of it, because
 17 that's -- it's clear from Wisconsin law and, you
 18 know, courts cannot -- federal courts can obviously
 19 override Wisconsin law, you described yourself
 20 earlier as solution oriented.
 21 Assuming it were lawful or ordered by
 22 a court, would you describe this alternative of

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1 solution to the problem of absentee ballot delivery
 2 failures for regular absentee voters, not UOCAVA
 3 voters?
 4 A. It would represent the same option as
 5 an E-mail option does right now, currently, so
 6 there's limitations to electronic delivery as well in
 7 terms of the ability to reissue. I -- I can't
 8 speculate beyond that, but I think the E-mail option
 9 that's in place right now is comparable.
 10 Q. So a couple -- couple questions on
 11 that. I was going to get into E-mail delivery just
 12 now, checking my time.
 13 Comparing online access and
 14 downloading through myvote.wi.gov and E-mail
 15 delivery, which is easier on the municipal clerk
 16 staff?
 17 A. If we're referencing UOCAVA voters
 18 and --
 19 Q. Sure.
 20 A. -- again, just looking at the
 21 issuance, not the holistic ballot remaking and all of
 22 that, again, you know, the clerks don't have to do

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1 online access and downloading of mail-in absentee
 2 ballots as a solution to the postal service's
 3 absentee ballot delivery failures or untimely ballot
 4 delivery?
 5 MR. GAHNZ: Are you -- let me ask for
 6 clarification. Are you asking her as the
 7 administrator of the WEC or her -- her personal
 8 opinion?
 9 MR. SHERMAN: I'm asking her as the
 10 administrator of the Wisconsin Elections Commission.
 11 A. You know, the Commission hasn't taken
 12 a position on that, and also the pool right now is
 13 military and overseas voters, and so you're not
 14 comparing the same steps of voters, as we produced a
 15 report on, you know, for the April election. I'm not
 16 sure.
 17 BY MR. SHERMAN:
 18 Q. Right. I -- I just want to make sure
 19 the question was -- was understood, but whatever your
 20 response is, is fine, but if -- if the court were to
 21 order -- forget -- forget whether the court orders or
 22 not. Leaving aside the legality of it, would it be a

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1 anything with the online ballots, but when they
 2 E-mail them, they have to do the transaction
 3 themselves.
 4 Q. And as of Monday because of the One
 5 Wisconsin Institute decision issued by the
 6 7th Circuit, E-mail delivery is not an option for
 7 regular absentee voters anymore, correct?
 8 A. Actually it is until the 7th Circuit
 9 issues a mandate, so as of today, it's still an
 10 option.
 11 Q. Okay. Once they issue the mandate,
 12 though, likely for the November election, unless that
 13 decision is stayed or reversed, E-mail delivery, as
 14 it stands right now, based on that decision, would
 15 not be an option for regular voters, correct?
 16 A. That's my understanding, yes.
 17 Q. Okay. So just turning -- turning
 18 quickly -- and I have fewer questions on this. And I
 19 think we're be able to go faster on this. I have a
 20 couple of questions regarding E-mail delivery, and in
 21 advance, let me just say, if I pause, it's just
 22 because I'm skipping questions. I'm sorry, if I take

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1 a minute.

2 Do you know how long E-mail delivery

3 has been offered to UOCAVA voters?

4 A. I believe -- there's been some back

5 and forth in court decisions that has impacted that,

6 so I'm not sure what the -- the cumulative sum of

7 that would have been, but I -- I don't know -- I

8 don't know. I'd have to retrace the legislative and

9 litigation history.

10 Q. Okay. Fair enough.

11 Does a military or overseas voter

12 need to request E-mail delivery when requesting their

13 absentee ballot?

14 A. Yes.

15 Q. Can they request E-mail delivery on

16 the myvote.wi.gov portal?

17 A. Yes.

18 Q. So, a regular voter cannot, but a

19 UOCAVA voter can, request E-mail delivery on the

20 MyVote portal, correct?

21 A. Yes. Again because they don't --

22 they're exempt from photo ID, so it's a different

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1 workable.

2 Q. Understood. And we still have up

3 Exhibit 11 -- excuse me, Exhibit 7 if you need to

4 refer to it, but you can request E-mail delivery

5 using the EL-121 form, correct?

6 A. Yes.

7 Q. And is this the on -- unless you have

8 the voter's E-mail address already from their voter

9 registration form, is this the only other way the

10 voter can communicate what their E-mail address is to

11 the municipal clerk's office?

12 A. No, again, this form one is hardly

13 ever utilized. A voter can just send an E-mail to

14 the clerk and ask them for an absentee ballot. So,

15 that's probably the most common way.

16 Q. The --

17 THE VIDEOGRAPHER: Hey guys, can you

18 -- can you give me one second. I think the -- we may

19 have to go off the record. I think the court

20 reporter might have dropped off, so can we go off the

21 record? Just give me one second.

22 MR. GAHNZ: Yes, please.

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1 THE VIDEOGRAPHER: All right. The

2 time is 1:27 p.m. Off the record.

3 (Brief recess.)

4 THE VIDEOGRAPHER: The time is

5 1:29 p.m. Back on the record.

6 MR. SHERMAN: Okay. Thank you.

7 BY MR. SHERMAN:

8 Q. And just for the sake of

9 completeness, can a military or overseas voter

10 request E-mail delivery of an absentee ballot using

11 the Federal Postcard Application?

12 A. Yes, like I stated, it's kind of a

13 goofy thing, where it says E-mail/online, but, yes.

14 Q. Right. And then they have to have a

15 conversation and --

16 A. Right.

17 Q. -- pick one of the two? Right.

18 A. Yes.

19 Q. Okay. What does a municipal clerk's

20 office need to do, if anything, when it receives a

21 military or overseas voter request for a mail-in

22 absentee ballot by E-mail delivery? Can you just

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1 walk us through that process?

2 A. Sure. So when a clerk receives a

3 UOCAVA voter's request for an E-mail ballot, first,

4 they are going to go in, just like they would for any

5 voter, and make sure that they are actually

6 registered, find their voter record. So if there's

7 any issue there, they're going to contact the voter,

8 of course, before they'll issue any kind of ballot.

9 And then they have to put in the

10 voter's request, so they have to data enter in the

11 voter's request. So they have to select whether or

12 not it's an individual election, the calendar year,

13 indefinitely confined, they have to select the type

14 of voter that they are. If they had a mailing

15 address, they'd have to enter that information, and

16 then they would, in the system, indicate when they

17 have sent the ballot. And then, they would have to

18 either scan in the voter's ballot, so they would have

19 to find that ballot style, scan it in, and send

20 attachments of the ballot and the uniform

21 instructions and the certificate, all the materials,

22 to the voter by E-mail.

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1 Q. Okay. And does WisVote (inaudible)
 2 in that process?
 3 A. Yes, just like with MyVote, you know,
 4 it's going to help them determine what the ballot
 5 style is, but it doesn't have the shiny, you know,
 6 interface of -- of MyVote to create the ballot for
 7 them, but it's going to say this is the ballot style.
 8 So, you know, this is the district combo and ballot
 9 style based on all that information we talked about
 10 that you're going to issue to that voter.
 11 We can -- we also help them, in the
 12 WisVote system, with creating that absentee
 13 certificate. So that balloting material that they're
 14 going to send along with the ballot itself, we can --
 15 we can facilitate that process in WisVote.
 16 Not all clerks use WisVote, and so
 17 some of them would then have to create those
 18 materials based on, you know, what's posted in our
 19 form.
 20 Q. And would an absentee voter, military
 21 or overseas voter, excuse me, be able to change the
 22 request from mail to E-mail delivery, or would a

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1 clerk need to cancel the request, and they'd file a
 2 new one?
 3 A. Any time a voter is changing their
 4 request, they have to contact their clerk to cancel
 5 the current request so that they can submit a new
 6 one.
 7 Q. Okay. Is it -- give me just one
 8 second. Do clerks cover postage when a ballot is
 9 accessed -- when a ballot is E-mailed?
 10 A. No.
 11 Q. Do you have cybersecurity concerns
 12 with E-mail delivery, or do you think this would be a
 13 secure way to deliver ballots, replacement ballots,
 14 to folks who don't receive their ballot in the mail?
 15 A. We have no control over clerks'
 16 E-mails. So we've offered them grants and supports
 17 in getting, you know, .gov E-mails and other E-mail
 18 services; but at the end of the day, the
 19 municipalities' decision on -- on what type of E-mail
 20 they maintain, and there are certain different levels
 21 of security associated with different types of E-mail
 22 addresses.

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1 Attachments coming from a -- to and
 2 from a voter is always, you know, is a transaction
 3 that should be handled with care. On the voter side,
 4 too, getting something that's full of attachments
 5 could be something that they would want to call their
 6 clerk and verify that it was legitimately sent, all
 7 of that. So, you know, as with any E-mail
 8 transaction, it's something that you need to be
 9 careful.
 10 Q. Thank you. And in the past, you've
 11 sent out thousands of -- not you, excuse me.
 12 In the past, municipal clerks have
 13 sent out thousands of E-mail-delivered absentee
 14 ballots to voters, correct?
 15 A. I don't have the number in front of
 16 me. I would assume it's in the -- the thousands, but
 17 I don't know.
 18 Q. And going forward, even after One
 19 Wisconsin Institute, municipal clerks are still going
 20 to send out absentee ballots via E-mail delivery to
 21 UOCAVA voters, correct?
 22 A. It's required by law to have that

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1 option for them, yes.
 2 Q. And are you doing anything to make
 3 the process that's more secure going forward, given
 4 those are E-mail deliveries of absentee ballots?
 5 A. Absolutely, and I don't mean to
 6 suggest that there's any risk to the ballot itself.
 7 It's just, you know, E-mail has its own inherent risk
 8 in terms of transactions and viruses on your
 9 computer, things like that, to the actual user device
 10 more than the -- the -- the security of the ballot
 11 itself.
 12 We have been offering municipal
 13 clerks a grant program in addition to training to
 14 make sure that their devices are secured. So one of
 15 the things before a clerk can get credentials to the
 16 statewide database or anything, they have to go
 17 through interactive training modules that we created
 18 for them to understand things like phishing E-mails
 19 and how to operate a browser securely. So they have
 20 that training.
 21 We also offered a municipal subgrant
 22 since 2019, and over a thousand of our clerks have

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1 taken part in this, where if they don't have a
 2 device, a computer that has the most security -- most
 3 up-to-date security standards in accordance with the
 4 recommendation, they can apply to us for grant funds
 5 to get that so that they can protect their device and
 6 their municipality. We also offer a grant for them
 7 to get IT support, if they don't have IT support, and
 8 a grant to attend training.

9 This is in addition to all sorts of
 10 things we do for their devices. So all of our clerks
 11 also have what we call "endpoint protection" on their
 12 devices. So if they did have any kind of a virus or
 13 anything, we would see that. It would be flagged in
 14 our system, and we would be able to help them
 15 remediate it, connect them with the state cyber
 16 response team to make sure that it doesn't spread.
 17 So either -- they're many, many -- and that's just
 18 the tip of the iceberg. There are many, many things
 19 we do to help protect their devices and their
 20 transaction.

21 Q. Understood. It sounds like from what
 22 you said, you're not concerned about the security of

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1 the ballot; is that correct?

2 A. Correct, it's -- it's more or less
 3 the -- the transaction by E-mail and attachments.
 4 You know, we tell clerks not to open, or voters,
 5 anybody, not to open attachments from people they
 6 don't know. So, you know, that transaction has to be
 7 handled with care.

8 Q. You don't know of any instance where
 9 someone has fraudulently accessed an E-mail-delivered
 10 absentee ballot and then voted it, correct?

11 A. No, no.

12 Q. Is that a concern that you have given
 13 that you're doing this for UOCAVA voters?

14 A. So voters -- you know, when -- again,
 15 they have to return the ballots by regular mail. So
 16 they have to print it out, return it. And then, of
 17 course, the clerk is going to look in the statewide
 18 system to make sure it was lawfully issued. They are
 19 not just going to send the ballot down to the polls
 20 to be counted.

21 So when they get a ballot back, they
 22 are going to match that with the voter record, match

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1 it with the fact that it was actually issued before
 2 it's sent down to be counted. So we're -- so there's
 3 a lot of checks to make sure that somebody else
 4 didn't send that ballot.

5 Q. So do you -- do you consider --
 6 overall, given everything we've discussed, do you
 7 consider E-mail delivery a secure method of
 8 delivering a ballot to a voter?

9 A. I think we have put a lot of security
 10 measures in place. It depends how you define
 11 security. But in terms of making sure only
 12 lawfully -- lawfully issued ballots are counted, yes.

13 Q. Okay. Once -- this is the same
 14 process for -- on the back end, right, the clerks
 15 would have to remake and duplicate the ballots?

16 A. Yes.

17 Q. Okay. And -- and given that there
 18 has been a multiyear history now of -- because of One
 19 Wisconsin Institute of delivering ballots by E-mail
 20 to regular voters in addition to military and
 21 overseas voters, would it be difficult to revert to
 22 that system for municipal clerks' offices?

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1 A. To -- to revert to the online system?

2 Q. Excuse me, I'll restate the question.
 3 I -- I stated it in a confusing way.

4 So given that One Wisconsin
 5 Institute, the district court's opinion in One
 6 Wisconsin Institute, for a time invalidated the ban
 7 on E-mail delivery of absentee ballots to regular
 8 voters, there were a few years in there before
 9 Monday's decision, where E-mail delivery was allowed
 10 to regular voters. Would it be easy to revert to a
 11 system where both military and overseas voters, as
 12 well as regular voters, could receive a ballot by
 13 E-mail?

14 A. Well, as of this moment, that is the
 15 case. I -- so it would require training the clerks.
 16 It's not something where we would have to update our
 17 systems, other than, you know, once the -- the
 18 decision is in place, we are going to have to change
 19 the WisVote system.

20 So when a clerk goes in to issue
 21 ballots, they are only going to see the option to
 22 issue an E-mail ballot if the voter is UOCAVA. So

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<p style="text-align: right;">Page 177</p> <p>1 there are some, you know, changes that we do have to 2 make in the statewide database depending on what the 3 prevailing ruling is.</p> <p>4 Q. Understood. Most -- most municipal 5 clerks in the state have experience with E-mail 6 delivery to UOCAVA voters, so it wouldn't require 7 anything additional, correct, to also deliver ballots 8 by E-mail to regular voters?</p> <p>9 A. Right now, yeah, all clerks have to 10 offer that option. I don't know that all clerks have 11 used it. I know that at one point we did an analysis 12 of how many clerks had seen the federal forms for 13 military and over -- overseas voters, FWAB or the 14 FPCA, and it was something like 80 percent of the 15 clerks saw one for the first time, you know, in a -- 16 a presidential election. So I -- I don't know. I -- 17 I don't know what the data would be on that.</p> <p>18 Q. Okay. Would you need to reprogram 19 MyVote and WisVote to allow for E-mail delivery to 20 regular voters once again?</p> <p>21 A. Yes, because we're -- we're making 22 those changes now to not allow that; so, yes, we'd</p>	<p style="text-align: right;">Page 179</p> <p>1 they are overseas temporarily. Permanent overseas is 2 a voter who does not have the intent to return.</p> <p>3 There's also a difference in the type 4 of ballot that they are allowed to cast. So a 5 permanent overseas voter is only eligible for federal 6 ballots; a temporary overseas voter with intent to 7 return is eligible to receive a full ballot with 8 state and local contests.</p> <p>9 Q. Okay. Are there any other 10 differences between the two categories from an 11 election security perspective or any other meaningful 12 difference?</p> <p>13 A. There are some differences when it 14 comes to proof of residence for registering to vote 15 for things like being able to register online. 16 There -- you know, there are -- there certainly are 17 some differences in those, but there -- we have a 18 couple of pages' worth of documentation that 19 describes those differences which I used to know, but 20 I -- I'm a little rusty on.</p> <p>21 Q. Understood. If I could just clarify 22 my question before, I just want to make sure we get</p>
<p style="text-align: right;">Page 178</p> <p>1 have to change it again.</p> <p>2 Q. Okay. But those changes, just to be 3 clear, haven't gone into effect and wouldn't until 4 the 7th Circuit issues its mandate?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. And you would need to change 7 form EL-121, as well, correct?</p> <p>8 A. The instructions, because only 9 military and overseas -- it -- so only, you know, 10 UOCAVA voters would have the option for E-mail. So 11 we'd have to change the instructions that correspond 12 with Box 5.</p> <p>13 Q. Understood. Okay. Thank you. Just 14 a couple of more questions. I'm getting close to 15 wrapping up.</p> <p>16 From an election administration 17 perspective, and this, you can -- given everything 18 we've discussed today, is there any meaningful 19 difference between a temporary overseas voter and a 20 regular voter who's residing in Wisconsin?</p> <p>21 A. Yes, there is. Temporary overseas is 22 defined as a voter who has the intent to return. So</p>	<p style="text-align: right;">Page 180</p> <p>1 this down correctly. I'm asking about the difference 2 between temporary overseas voters and regular voters 3 who are based in Wisconsin, not the difference 4 between --</p> <p>5 A. Oh.</p> <p>6 Q. -- temporary and permanent overseas.</p> <p>7 A. Thank you.</p> <p>8 Q. Is there any -- is there any 9 meaningful election administration -- difference from 10 an election administration or election security 11 perspective?</p> <p>12 A. Not that I can think of other than, 13 of course, the volume, the -- the pool of people that 14 would be eligible for those qualifications, which you 15 know, a volume is -- is, of course, a -- a concern 16 because like as when you're dealing with a small 17 subset of people who are overseas temporarily versus 18 all eligible Wisconsinites. There's different 19 security measures you'd have to have in place to 20 establish a baseline.</p> <p>21 Q. Understood. In -- and I understand 22 that it's -- it is something of an increased -- it is</p>

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1 something of a burden, whatever it is to duplicate
 2 and remake a ballot as opposed to just feeding a
 3 regular official ballot into a machine; is that
 4 correct?
 5 A. Yes, it's certainly additional steps
 6 that don't have to happen for ballots cast on ballot
 7 papers.
 8 Q. Would you agree that given the
 9 problems that were experienced with postal service
 10 delivery and software upgrade failures that, on
 11 balance, it would be better to have a backup option
 12 for voters to cast their ballot even if it resulted
 13 in some increased efforts in duplicating those
 14 ballots on the back end?
 15 MR. GAHNZ: Objection.
 16 A. I -- I don't have information to be
 17 able to make -- draw that conclusion.
 18 BY MR. SHERMAN:
 19 Q. Just real quickly, on the Federal
 20 Write-in Absentee Ballot, do you have any sense of
 21 how -- how many of those ballots come in, in a
 22 presidential election?

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1 A. Well, we track, and we're required to
 2 report that to the federal government after each
 3 federal election, so the data is out there, but I --
 4 I don't have it in front of me.
 5 Q. And -- and with a Federal Write-in
 6 Absentee Ballot, that can be downloaded by a military
 7 or overseas voter and cast without any involvement
 8 from a municipal clerk's office, correct?
 9 A. Correct. If they're a military
 10 voter, that's correct, because this is, you know, an
 11 emergency ballot that if -- let's say you're a
 12 military voter and you didn't receive your ballot or
 13 you're on a submarine or something where you can't
 14 get mail delivery, you're writing in who you want to
 15 vote for, so you might not even be looking at a list
 16 of eligible candidates, but let's say you want to
 17 vote for president or something, you can write it in,
 18 and then you send it back to your clerk.
 19 It also triggers, though, that the
 20 clerk has to send you an official ballot. So when
 21 the clerk receives that voter's special write-in
 22 ballot, they're required to then send that voter a

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1 full official ballot. And if they don't get the
 2 voter's full official ballot back by election day,
 3 they're going to count that write-in ballot, but the
 4 goal is always to get the full official ballot --
 5 ballot back.
 6 Q. And if they do get the -- the
 7 official ballot by election day, then that will
 8 supersede the Federal Write-in Absentee Ballot they
 9 case, correct?
 10 A. Correct.
 11 Q. And the Federal Write-in Absentee
 12 Ballot, do you have any concerns about the security
 13 of a Federal Write-in Absentee Ballot that's
 14 downloaded on an emergency basis and cast?
 15 A. Well, it's not really a ballot.
 16 It's -- you know, it's just a series of lines, and
 17 then the voter has to certify that they are who they
 18 say they are, and they have to have a witness. So
 19 it's basically a -- a universal form, but then it has
 20 a big packet of instructions that go along with it,
 21 the voting assistance guide, that tells the voter
 22 what they have to do to make sure that that ballot

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1 counts. So they still have to have a witness. They
 2 still have to do all the things that are required
 3 under our law to send it back.
 4 So they are not downloading the
 5 ballot, per se, a lot of these are paper forms
 6 available at embassies or on military installations
 7 that they're picking up, you know, and -- and filling
 8 out in this emergency situation.
 9 Q. But it can also be downloaded,
 10 correct?
 11 A. It can be.
 12 Q. And printed?
 13 A. Yes, it can be.
 14 Q. Okay. And -- I just want to be clear
 15 on this, when a Federal Write-in Absentee Ballot was
 16 received, you will cast -- you read those votes and
 17 cast that ballot and count it, correct?
 18 A. Yes, it would have to be remade. So
 19 the local election official would have to remake the
 20 contests and candidates on that ballot using the
 21 statutory process where they have to go through and
 22 agree on voter intents and all of this and -- and

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<p>1 remake the ballot, and it would be counted. The 2 remade ballot would be counted if they don't receive 3 the official ballot back in time.</p> <p>4 Q. Okay. And the -- and the Federal 5 Write-in Absentee Ballot is -- is only used in 6 Wisconsin. It -- it's only used as a replacement 7 ballot, correct, if the voter already has a prior 8 request on file?</p> <p>9 A. No -- it -- no, for military voters, 10 they can -- you know, I have been part of a work 11 group for years now where we go to military 12 installations, and a lot of times they will be, you 13 know, overseas on a installation on a ship in the 14 middle of the sea. And so they'll fill out the 15 Federal Write-in Absentee Ballot. It goes to the 16 clerk. The clerk holds onto that; sends them the 17 official ballot. If their voter never gets the 18 official ballot or the official never comes back, 19 then they are going to count the Federal Write-in 20 ballot; but, no, they don't have to have a request on 21 file.</p> <p>22 Q. Okay. So a military or overseas</p>	<p>1 E-mail or fax, but once the 7th Circuit's ruling's in 2 place, then, yes, mail will be the only way.</p> <p>3 Special voting deputies bring ballots 4 to care facilities. There's also exceptions for 5 hospitalized electors and sequestered jurors, but 6 outside of that, a regular voter would only have the 7 option to get a write-in ballot.</p> <p>8 Q. And does mail -- mail delivery, would 9 that encompass UPS, FedEx? You wouldn't need to 10 rely -- you're not bound by law to rely on the US 11 Postal Service, are you?</p> <p>12 A. I don't believe so because for 13 overseas ballots sometimes they have to go through 14 other delivery methods because USPS isn't the best 15 way to get their ballot delivered, but for domestic 16 ballots, I'm not aware of any situation where the 17 clerk does not send them out by USPS.</p> <p>18 Q. This is going to be a crazy question, 19 but I'm going to ask it anyway: Can clerks' offices 20 hire staff to deliver ballots to voters?</p> <p>21 A. No.</p> <p>22 Q. And why is that?</p>
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<p>1 voter can cast a Federal Write-in Absentee Ballot in 2 the first instance without a prior request for an 3 absentee ballot on file, and that ballot, when it's 4 submitted, will be counted, correct?</p> <p>5 A. Correct, because the Federal Write-in 6 Absentee Ballot also is a request form. So basically 7 they are sending it to the clerk saying, "I want a 8 real ballot, but here's my emergency ballot in case I 9 don't get that."</p> <p>10 Q. But it will be counted even if they 11 only -- if they only receive that FWAB, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Thank you.</p> <p>14 Let me just check real quick. I 15 think -- I don't have any other questions, but I just 16 wanted to make sure.</p> <p>17 One -- one final question: Are you 18 required by law to deliver an absentee ballot through 19 the mail for someone who -- for a regular voter? Do 20 you have any other options?</p> <p>21 A. Well, as of today, a regular voter, 22 if the clerk chooses, can get their ballot by mail,</p>	<p>1 A. Because the law requires that it has 2 to be mailed to them so they can't be hand-delivering 3 them to people.</p> <p>4 Q. But it could go through a private 5 carrier. It doesn't need to go through USPS, 6 correct?</p> <p>7 A. I -- I would have to -- I don't know. 8 I would have to look at that statute. I can't 9 remember if it says it has to go through the postal 10 service or a delivery service.</p> <p>11 MR. SHERMAN: Thanks very much. I 12 really appreciate you being here and answering all of 13 these questions.</p> <p>14 THE WITNESS: Thank you.</p> <p>15 MR. GAHNZ: All right. So we have a 16 request by the Swenson plaintiffs for either the 16th 17 or the 17th of July for the continuation of 18 Ms. Wolfe's deposition. I'm going to check with 19 Ms. Wolfe after we're done here. Hopefully, though, 20 one of those two dates will work for her and for 21 the -- the rest of the folks.</p> <p>22 MR. DEVANEY: Objection. So this is</p>

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1 John Devaney. When I finished, I mentioned I had one
 2 document I couldn't find. Would you be willing to
 3 give me three minutes on that document?
 4 MR. GAHNZ: Sure.
 5 Meagan, you're -- you're still on the
 6 clock. Sorry.
 7 THE WITNESS: I don't know what it's
 8 like not to be on the clock.
 9 MR. GAHNZ: Fair enough.
 10 MR. DEVANEY: I promise you, I will
 11 be very efficient here.
 12 Henry, could you pull up Exhibit 19.
 13 THE TECH: Sure. (Complying.)
 14 MR. DEVANEY: Sorry, it's 18 then.
 15 THE TECH: (Complying.)
 16 (Whereupon, Wolfe Exhibit 18,
 17 03/19/20 Letter, was marked for identification.)
 18 MR. DEVANEY: Okay.
 19 RE-EXAMINATION
 20 BY MR. DEVANEY:
 21 Q. Ms. Wolfe, have you seen this letter
 22 before? It's dated March 19, 2020, which we received

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1 in discovery last night. You'll see at the end --
 2 A. I am -- I don't know -- I don't think
 3 I sent this. So is this one that came -- you
 4 might -- you have to show me who it's from. I don't
 5 know.
 6 MR. DEVANEY: Henry, please go to the
 7 last page.
 8 THE TECH: (Complying.)
 9 THE WITNESS: Thank you.
 10 A. I'm familiar with this, but I was not
 11 part of this.
 12 BY MR. DEVANEY:
 13 Q. And you'll see you're cc'd on it?
 14 A. Yes.
 15 Q. Were you consulted in connection with
 16 the content of this letter?
 17 A. No.
 18 Q. You were just cc'd on it, and you
 19 didn't know anything about it?
 20 A. Yes.
 21 MR. DEVANEY: Okay. I was more
 22 efficient than I even predicted, Dixon.

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1 MR. GAHNZ: Thanks. Very good.
 2 MR. DEVANEY: Thank you, Ms. Wolfe,
 3 we really appreciate you doing this on this national
 4 holiday.
 5 THE VIDEOGRAPHER: All right. We're
 6 going off the record, right.
 7 MR. GAHNZ: Yep.
 8 THE VIDEOGRAPHER: Okay. This marks
 9 the end of today's deposition. The time is 1:54 p.m.
 10 MR. GAHNZ: All right. Before
 11 everybody signs off, I will just let you know that I
 12 will check with Ms. Wolfe and get an E-mail out to
 13 you guys yet today in terms of her preference for the
 14 16th or the 17th or her availability for either date.
 15 Okay?
 16 MR. BROWNE: Thank you. Thanks.
 17 THE REPORTER: Can you put your --
 18 MR. BROWNE: Robert Browne, just a
 19 request to the court reporter, could --
 20 THE REPORTER: Yes.
 21 MR. BROWNE: -- and I don't know if
 22 people have made this request, can we get rough

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1 transcripts? I don't know if you have people's
 2 information.
 3 THE REPORTER: Do you want -- just
 4 put all your orders on the record. What else -- you
 5 want a rough, and when do you want the final?
 6 MR. BROWNE: As soon as possible.
 7 THE REPORTER: You want the final as
 8 soon as possible too?
 9 MR. BROWNE: The rough as soon as
 10 possible.
 11 THE REPORTER: Okay. Yeah, you'll
 12 have it soon. You'll have it today.
 13 Who else wants the rough?
 14 MS. ROSENZWEIG: This is Stacie --
 15 this is Stacie Rosenzweig from the Edwards team. I'd
 16 like a rough ASAP, as well.
 17 THE REPORTER: Okay. And you want
 18 regular delivery on the final?
 19 MS. ROSENZWEIG: That's fine.
 20 MR. DEVANEY: And the same for John
 21 Devaney.
 22 MR. SHERMAN: The same for John

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1 Sherman.
 2 THE REPORTER: Anybody else?
 3 MR. SCHWARZTOL: Same for Larry
 4 Schwartzol from the Swenson team.
 5 MR. SHERMAN: Just so I understand --
 6 sorry to ask again -- but the rough would come today
 7 and then the final would come when?
 8 THE REPORTER: When do you want it?
 9 MR. SHERMAN: Well, we do have a PI
 10 motion due on Wednesday. Is there any chance we
 11 could get it late Tuesday?
 12 THE REPORTER: Sure. Yep.
 13 MR. SHERMAN: That would be -- that
 14 would be amazing. Thank you.
 15 THE REPORTER: Okay. Anybody else
 16 have any requests?
 17 MR. GAHNZ: How do you -- we'll take
 18 -- we'll take just the regular, whenever it's ready.
 19 THE REPORTER: Okay.
 20 MR. GAHNZ: Or a final.
 21 MR. DEVANEY: And this is John
 22 Devaney, we'd -- we'd also like the final on Tuesday

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1 if -- if you're able to provide it then.
 2 THE REPORTER: Sure.
 3 MR. GAHNZ: All right. Ms. Wolfe,
 4 you can sign off and -- and start your holiday.
 5 (Time Noted: 1:57 p.m.)
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 2 I, Amanda Gorrone, the officer before
 3 whom the foregoing depositions were taken, do hereby
 4 certify that the foregoing transcript is a true and
 5 correct record of the testimony given; that said
 6 testimony was taken by me stenographically and
 7 thereafter reduced to typewriting under my direction;
 8 and that I am neither counsel for, related to, nor
 9 employed by any of the parties to this case and have
 10 no interest, financial or otherwise, in its outcome.
 11 IN WITNESS WHEREOF, I have hereunto
 12 set my hand this 3rd day of July, 2020.
 13
 14
 15 AMANDA GORRONO, CLR
 16 CLR NO: 052005 - 01
 17
 18 Notary Public in and for the State of New York
 19 County of Suffolk
 20 My Commission No. 01G06041701
 21 Expires: 01/07/2023
 22

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1 Megan Wolfe 30(b)(6), c/o
 2 Lawton & Cates, S.C.
 3 345 W. Washington Ave., Suite 201, P.O. Box 2965
 4 Madison, WI 53701
 5
 6 Case: Democratic National Committee v. Marge Bostlemann, et al.
 7 Date of deposition: July 3, 2020
 8 Deponent: Megan Wolfe 30(b)(6)
 9
 10 Please be advised that the transcript in the above
 11 referenced matter is now complete and ready for signature.
 12 The deponent may come to this office to sign the transcript,
 13 a copy may be purchased for the witness to review and sign,
 14 or the deponent and/or counsel may waive the option of
 15 signing. Please advise us of the option selected.
 16 Please forward the errata sheet and the original signed
 17 signature page to counsel noticing the deposition, noting the
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5 Witness Name: Megan Wolfe 30(b)(6)
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7 I do hereby acknowledge that I have read
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8 of the transcript of my deposition and that:
9

10 (Check appropriate box):
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7

8 Case: Democratic National Committee v. Marge Bostlemann, et al.
9 Witness Name: Megan Wolfe 30(b)(6)
10 Deposition Date: July 3, 2020

11 Page No. Line No. Change
12
13
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22 _____
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50 (Pages 197 to 198)

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Amanda Gorrone, the officer before
whom the foregoing depositions were taken, do hereby
3 certify that the foregoing transcript is a true and
correct record of the testimony given; that said
4 testimony was taken by me stenographically and
thereafter reduced to typewriting under my direction;
5 and that I am neither counsel for, related to, nor
employed by any of the parties to this case and have
6 no interest, financial or otherwise, in its outcome.

7 IN WITNESS WHEREOF, I have hereunto
8 set my hand this 3rd day of July, 2020.

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22



AMANDA GORRONE, CLR
CLR NO: 052005 - 01

Notary Public in and for the State of New York
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My Commission No. 01G06041701
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Transcript of Meagan Wolfe
Conducted on July 16, 2020

<p style="text-align: center;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE WESTERN DISTRICT OF WISCONSIN</p> <p>3 -----X</p> <p>4 DEMOCRATIC NATIONAL : 5 COMMITTEE, et al., : 6 Plaintiffs, : 7 v. : 8 MARGE BOSTELMANN, et al. : 9 Defendants, : 10 and : Case No. 20-cv-249-wmc 11 WISCONSIN LEGISLATURE, : 12 REPUBLICAN NATIONAL : 13 COMMITTEE, and REPUBLICAN : 14 PARTY OF WISCONSIN, : 15 Intervening Defendants. : 16 -----X</p> <p>17 (Caption continued on next page)</p> <p>18 VOLUME 2</p> <p>19 Deposition of MEAGAN WOLFE 20 Conducted Virtually 21 Thursday, July 16, 2020 22 8:31 a.m. CST</p> <p>23 Job No.: 307428 24 Pages: 1 - 212 25 Reported by: Tiffany M. Pietrzyk, CSR RPR CRR</p>	<p style="text-align: center;">3</p> <p>1 (Caption continued from previous page)</p> <p>2 -----X</p> <p>3 JILL SWENSON, et al. : 4 Plaintiffs, : 5 v. : 6 MARGE BOSTELMANN, et al. : 7 Defendants, : 8 and : Case No. 20-cv-459-wmc 9 WISCONSIN LEGISLATURE, : 10 REPUBLICAN NATIONAL : 11 COMMITTEE, and REPUBLICAN : 12 PARTY OF WISCONSIN, : 13 Intervening Defendants. : 14 : 15 -----X</p> <p>16</p> <p>17 Deposition of MEAGAN WOLFE, conducted 18 virtually: 19 20 Pursuant to notice before Tiffany M. Pietrzyk, a 21 Certified Shorthand Reporter, Registered 22 Professional Reporter, Certified Realtime Reporter, 23 and a Notary Public in and for the State of 24 Illinois. 25</p>
<p style="text-align: center;">2</p> <p>1 (Caption continued from previous page)</p> <p>2 -----X</p> <p>3 SYLVIA GEAR, et al., : 4 Plaintiffs, : 5 v. : 6 MARGE BOSTELMANN, et al. : 7 Defendants, : 8 and : Case No. 20-cv-278-wmc 9 WISCONSIN LEGISLATURE, : 10 REPUBLICAN NATIONAL : 11 COMMITTEE, and REPUBLICAN : 12 PARTY OF WISCONSIN, : 13 Intervening Defendants. : 14 -----X</p> <p>15 CHRYSTAL EDWARDS, et al., : 16 Plaintiffs, : 17 v. : 18 ROBIN VOS, et al., : 19 Defendants, : 20 and : Case No. 20-cv-340-wmc 21 REPUBLICAN NATIONAL : 22 COMMITTEE and REPUBLICAN : 23 PARTY OF WISCONSIN, : 24 Intervening Defendants : 25 -----X</p>	<p style="text-align: center;">4</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFFS DEMOCRATIC NATIONAL 4 COMMITTEE and DEMOCRATIC PARTY OF WISCONSIN: 5 JOHN DEVANEY, ESQUIRE 6 BRANDON MICHAEL LEWIS, ESQUIRE 7 MICHELLE UMBERGER, ESQUIRE 8 PERKINS COIE, LLP 9 700 Thirteenth Street, N.W. 10 Suite 600 11 Washington, D.C. 20005 12 202.654.6200 13</p> <p>14 ON BEHALF OF THE GEAR PLAINTIFFS: 15 JON SHERMAN, ESQUIRE 16 FAIR ELECTIONS CENTER 17 1825 K Street N.W. 18 Suite 450 19 Washington, D.C. 20006 20 202.331.0114 21 22 23 24 25</p>

Transcript of Meagan Wolfe
 Conducted on July 16, 2020

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<p style="text-align: right;">9</p> <p>1 EXHIBITS (Cont.)</p> <p>2</p> <p>3 Exhibit 11 3/29/20 Wisconsin Elections 103</p> <p>4 Commission Memo</p> <p>5 Exhibit 12 4/10/20 Memo 110</p> <p>6 Exhibit 13 Subpoena to Testify at a 150</p> <p>7 Deposition in a Civil</p> <p>8 Action</p> <p>9 Exhibit 14 4/7/20 Election Summary 160</p> <p>10 Exhibit 15 4/7/20 Absentee Voting 178</p> <p>11 Report</p> <p>12 Exhibit 16 6/25/20 WEC Status Report 184</p> <p>13 Exhibit 17 7/7/20 Office of the 113</p> <p>14 Inspector General Report</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">11</p> <p>1 witness has verified that she is, in fact, Meagan</p> <p>2 Wolfe.</p> <p>3 MR. SCHWARTZTOL: For the Swenson</p> <p>4 plaintiffs, we do.</p> <p>5 MS. ROSENZWEIG: For Edwards plaintiffs, we</p> <p>6 do.</p> <p>7 MR. DEVANEY: For the DNC, Wisconsin</p> <p>8 Democratic Party, we agree.</p> <p>9 MR. BROWNE: For the Legislature, so</p> <p>10 stipulated.</p> <p>11 MR. GAHNZ: WEC defendants, so stipulated.</p> <p>12 COURT REPORTER: Is that everyone?</p> <p>13 Ms. Wolfe, do you hereby acknowledge that</p> <p>14 your testimony will be true under the penalties of</p> <p>15 perjury.</p> <p>16 THE WITNESS: Yes, I do.</p> <p>17 COURT REPORTER: Thank you.</p> <p>18 VIDEO TECH: You may proceed.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">10</p> <p>1 PROCEEDINGS</p> <p>2 VIDEO TECH: Thank you to everyone for</p> <p>3 attending this proceeding remotely which we</p> <p>4 anticipate will run smoothly. Just be aware we are</p> <p>5 recording this proceeding for backup purposes. Any</p> <p>6 off-the-record discussions should be had away from</p> <p>7 the computer, and please remember to mute your</p> <p>8 microphone for those conversations. Please have</p> <p>9 your video enabled to have our court reporter</p> <p>10 identify who is speaking. If you are unable to</p> <p>11 connect via video and you are connecting via phone,</p> <p>12 please voice-identify yourself each time before</p> <p>13 speaking. We will provide a complimentary unedited</p> <p>14 recording of this deposition with the purchase of</p> <p>15 any transcript in case you are interested. I</p> <p>16 apologize in advance for any technical-related</p> <p>17 interruptions. Thank you.</p> <p>18 Tiffany, you may proceed.</p> <p>19 COURT REPORTER: Will counsel please</p> <p>20 stipulate that in lieu of formally swearing in the</p> <p>21 witness, the reporter will instead ask the witness</p> <p>22 to acknowledge that their testimony will be true</p> <p>23 under the penalties of perjury, that counsel will</p> <p>24 not object to the admissibility of the transcript</p> <p>25 based on proceeding in this way, and that the</p>	<p style="text-align: right;">12</p> <p>1 WHEREUPON:</p> <p>2 MEAGAN WOLFE,</p> <p>3 called as a witness herein, having affirmed the</p> <p>4 acknowledgement, was examined and testified as</p> <p>5 follows:</p> <p>6 DIRECT EXAMINATION</p> <p>7 BY MR. SCHWARTZTOL:</p> <p>8 Q. Good morning Ms. Wolfe. My name --</p> <p>9 A. Good morning.</p> <p>10 Q. My name is Larry Schwartztol. I'm one of</p> <p>11 the attorneys for the Swenson plaintiffs. Thank you</p> <p>12 very much for making time to be with us here this</p> <p>13 morning. We appreciate it.</p> <p>14 Because I know you have been deposed before,</p> <p>15 including in this case, I'm going to skip the ground</p> <p>16 rules about how depositions work that you may have</p> <p>17 discussed with attorneys in previous depositions and</p> <p>18 just jump right in.</p> <p>19 A. Great.</p> <p>20 MR. SCHWARTZTOL: So I'm going to ask</p> <p>21 Leyhbert to pull up what we've saved as Exhibit 1.</p> <p>22 And to share that on the screen, please.</p> <p>23 VIDEO TECH: Sorry. I was muted. I</p> <p>24 apologize for that.</p> <p>25 MR. SCHWARTZTOL: No worries.</p>

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13	<p>1 (Exhibit 1 was marked for identification 2 and is attached to the transcript.) 3 BY MR. SCHWARTZTOL: 4 Q. Ms. Wolfe, have you seen this document 5 before? 6 This is -- if you need to ask to have it 7 scrolled, this is the notice of 30(b)(6) deposition 8 served by the Swenson plaintiffs in this case? 9 A. Yes, I have. 10 Q. And are you aware that you've been 11 designated to testify on behalf of the Wisconsin 12 Elections Commission pursuant to this notice? 13 A. Yes. 14 Q. And that the notice identifies several 15 topics on which we'll seek your testimony. 16 Are you aware of that? 17 A. Yes. 18 Q. Are you prepared to offer testimony on those 19 topics? 20 A. Yes, I am. 21 Q. Great. 22 MR. SCHWARTZTOL: We can take that down. 23 VIDEO TECH: Perfect. 24 BY MR. SCHWARTZTOL: 25 Q. Ms. Wolfe, is it correct that the Wisconsin</p>	15	<p>1 A. Yes. 2 Q. Okay. Let me ask you to take a look at page 3 1 of the report. 4 VIDEO TECH: Sorry? 5 MR. SCHWARTZTOL: Page 1 of the report, 6 which is page 2 of the document. 7 VIDEO TECH: Perfect. 8 MR. SCHWARTZTOL: If I can ask to have the 9 document scrolled down a little bit to where it 10 says -- I'm sorry. Scroll back up. 11 VIDEO TECH: So I'm on page 2. Like, the 12 number here, I can have -- 13 MR. SCHWARTZTOL: Where you are is perfect. 14 Thank you. 15 BY MR. SCHWARTZTOL: 16 Q. Okay. Ms. Wolfe, where the mission of the 17 Wisconsin Elections Commission is described there, 18 can you read that, that passage? 19 A. Sure. So under subsection B, it says 20 mission: The mission of the Commission is to 21 enhance representative democracy by ensuring the 22 integrity of Wisconsin's electoral process due to 23 the administration of Wisconsin's election laws and 24 the dissemination of information, guidance, and 25 services to local election officials, candidates,</p>
14	<p>1 Elections Commission is responsible for 2 administering and enforcing all election laws other 3 than those relating to campaign finance in 4 Wisconsin? 5 A. Administering, yes, in the terms of what the 6 statute says. Enforcement, yes, but we have some 7 pretty limited authority when it comes to 8 enforcement. 9 Q. Okay. 10 MR. SCHWARTZTOL: Please share what we've 11 saved as Exhibit No. 2. 12 (Exhibit 2 was marked for identification 13 and is attached to the transcript.) 14 VIDEO TECH: Yes, sir. Exhibit No. 2. 15 BY MR. SCHWARTZTOL: 16 Q. Okay. So this is the Commission's 2017 17 annual report. 18 So just quickly, Ms. Wolfe, as a 19 housekeeping matter, are you aware that this is the 20 most recent annual report that's available on the 21 Commission's website? 22 A. I believe we filed -- you'll have to forgive 23 me. We file a lot of reports. But I believe we had 24 to file an additional report in 2019. 25 Q. Okay. So there is a 2019 report?</p>	16	<p>1 policy makers, voters, and the public utilizing both 2 staff expertise and technology solutions. 3 Q. Thank you for that. And I should clarify, 4 because I'm going to ask you to read things on 5 documents a lot, I typically won't need you to read 6 them out loud. I want you -- 7 A. Oh. 8 Q. I want you to just take a look before asking 9 you questions, but thank you, Ms. Wolfe. 10 A. Yes. 11 Q. It is safe to assume that it is still within 12 the mission of the Wisconsin Elections Commission to 13 enhance representative democracy? 14 A. This report was produced in 2017. The 15 current commission has not adopted nor I don't 16 believe have they considered any type of mission 17 statement. So I can't speak for if the current 18 commission has taken a position or even is aware of 19 this particular. 20 Q. So the Wisconsin Elections Commission has no 21 position on whether its position includes enhancing 22 democracy? 23 A. To my knowledge, they have not considered 24 that particular item. 25 Q. Okay. And so no view on whether that was</p>

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5 (17 to 20)

17	<p>1 their mission in April?</p> <p>2 A. I would have to see what the 2019 report</p> <p>3 says. Again, I just -- I'm not sure what they've</p> <p>4 considered in terms of a mission statement or when</p> <p>5 they've signed off on more recent reports. The body</p> <p>6 as it exists today, I'm not sure what type of</p> <p>7 statements that they signed off on. In 2017, this</p> <p>8 was our mission.</p> <p>9 Q. And so not sure whether today, including for</p> <p>10 the November election, enhancing representative</p> <p>11 democracy is part of the Commission's mission?</p> <p>12 A. Again, I'm speaking on behalf of the</p> <p>13 Commission as an entity, and I don't know that</p> <p>14 they've considered a mission. I don't know that</p> <p>15 that's an item that's been brought before them or</p> <p>16 that they've made decision on.</p> <p>17 Q. Okay.</p> <p>18 MR. SCHWARTZTOL: Please scroll to the next</p> <p>19 page of the document.</p> <p>20 BY MR. SCHWARTZTOL:</p> <p>21 Q. Okay. Under that first italicized</p> <p>22 subheading regarding election administration, I just</p> <p>23 want to draw your attention to the first sentence</p> <p>24 there where it says, The agency ensures compliance</p> <p>25 with federal and state election law.</p>	19	<p>1 Q. And it would also include ensuring</p> <p>2 compliance with any requirements of the U.S.</p> <p>3 Constitution; correct?</p> <p>4 A. That is correct.</p> <p>5 Q. And in Wisconsin, much of the day-to-day</p> <p>6 administration of elections is done by local</p> <p>7 officials in the 1850 municipalities; is that</p> <p>8 correct?</p> <p>9 A. Yes, that's correct.</p> <p>10 Q. So does that mean that the Commission's</p> <p>11 responsibilities include ensuring compliance with</p> <p>12 state and federal election laws by those many</p> <p>13 officials who are doing the day-to-day work of</p> <p>14 administering elections?</p> <p>15 A. Depending on the provision, the state</p> <p>16 statute outlines the statutory responsibilities of</p> <p>17 each local government when it comes to administering</p> <p>18 elections. So while we certainly work with them to</p> <p>19 provide information, best practices, guidance,</p> <p>20 ultimately each municipality is responsible for</p> <p>21 ensuring that they're abiding by state and federal</p> <p>22 laws and fulfilling their statutory responsibility.</p> <p>23 Q. So the Commission would be, in your view,</p> <p>24 acting consistently with its mandate to ensure</p> <p>25 compliance with state and federal election laws even</p>
18	<p>1 Is that still a responsibility of the WEC?</p> <p>2 A. Yeah. Yes. Our job would be to implement</p> <p>3 the election laws as they exist. Again, this is a</p> <p>4 2017 report, so I don't know what -- what the</p> <p>5 variations in terms of what we might have presented</p> <p>6 in our most report that the current body has signed</p> <p>7 off on, but yes, that is what appears in this</p> <p>8 report.</p> <p>9 Q. So you don't know whether ensuring</p> <p>10 compliance with federal and state election law is</p> <p>11 still something the Commission still considers its</p> <p>12 responsibility?</p> <p>13 A. Of course, of course. But if you're asking</p> <p>14 me has the Commission itself signed off on and taken</p> <p>15 a position on any number of things, the current</p> <p>16 Commission, as a body as it exists today, did not</p> <p>17 sign off on this particular report.</p> <p>18 Q. And ensuring compliance with federal and</p> <p>19 state election laws includes ensuring compliance</p> <p>20 with the Voting Rights Act; correct?</p> <p>21 A. That is correct.</p> <p>22 Q. And it would include ensuring compliance</p> <p>23 with any applicable provisions of the Americans With</p> <p>24 Disabilities Act; correct?</p> <p>25 A. That is correct.</p>	20	<p>1 if state and federal election laws were, in fact,</p> <p>2 not being complied with in the day-to-day</p> <p>3 administration of elections in Wisconsin?</p> <p>4 MR. GAHNZ: Object to the form of the</p> <p>5 question.</p> <p>6 Q. You can answer.</p> <p>7 A. I'm sorry. I don't quite understand the</p> <p>8 question.</p> <p>9 Q. If the election officials conducting the</p> <p>10 day-to-day administration of Wisconsin elections are</p> <p>11 not complying with federal and state election laws</p> <p>12 and the Commission is not acting to ensure</p> <p>13 compliance with those laws, is the Commission acting</p> <p>14 consistently with its responsibilities?</p> <p>15 MR. GAHNZ: Same objection.</p> <p>16 A. I'm sorry. That didn't help to clarify.</p> <p>17 Could you rephrase it?</p> <p>18 Q. Well, we can move on. We can move on.</p> <p>19 MR. SCHWARTZTOL: Let's pull up what we've</p> <p>20 uploaded as Exhibit No. 3.</p> <p>21 (Exhibit 3 was marked for identification</p> <p>22 and is attached to the transcript.)</p> <p>23 VIDEO TECH: Yes, sir. Exhibit No. 3 for</p> <p>24 the record.</p> <p>25 MR. SCHWARTZTOL: Thank you.</p>

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6 (21 to 24)

21	<p>1 BY MR. SCHWARTZTOL:</p> <p>2 Q. This is a document produced for the members</p> <p>3 of the Wisconsin Elections Commission from Ms. Wolfe</p> <p>4 with the subject heading "Guidance Regarding</p> <p>5 Election Procedures and Public Health Emergency"</p> <p>6 dated March 12, 2020.</p> <p>7 Ms. Wolfe, are you familiar with this</p> <p>8 document?</p> <p>9 A. Yes, I am. There was a great deal of</p> <p>10 documents produced around this time; but yes, I'm</p> <p>11 sure once I read it, I'll be familiar with the</p> <p>12 content.</p> <p>13 Q. Understood.</p> <p>14 MR. SCHWARTZTOL: So let me ask to scroll to</p> <p>15 the final page of the document.</p> <p>16 Q. And ask you to take a moment, Ms. Wolfe, to</p> <p>17 read the first of the two recommended motions. This</p> <p>18 is the motion that concludes with the language, The</p> <p>19 Commission directs that all municipalities shall not</p> <p>20 use the special voting deputy process to serve</p> <p>21 residents in care facilities and instead shall</p> <p>22 transmit absentee ballots to those voters by mail.</p> <p>23 A. Yes, I've read it.</p> <p>24 Q. Was this motion adopted by the Commission?</p> <p>25 A. That would be part of the public record.</p>	23	<p>1 be allowed into care facilities after a number of</p> <p>2 meetings and so it wouldn't be practical. In the</p> <p>3 past, there is procedure for -- let's say a care</p> <p>4 facility is under quarantine, which happens for</p> <p>5 other types of diseases, that if you cannot get into</p> <p>6 the facility, then, of course, you can't delay</p> <p>7 sending those voters ballots if you're not going to</p> <p>8 be able to access it. So based on the executive</p> <p>9 order and the advice of public health officials, it</p> <p>10 was determined those two visits would not be</p> <p>11 possible.</p> <p>12 MR. SCHWARTZTOL: Let's pull up Exhibit</p> <p>13 No. 4, please.</p> <p>14 (Exhibit 4 was marked for identification</p> <p>15 and is attached to the transcript.)</p> <p>16 VIDEO TECH: Exhibit No. 4 for the record.</p> <p>17 BY MR. SCHWARTZTOL:</p> <p>18 Q. This is a memorandum from Ms. Wolfe to</p> <p>19 Wisconsin county clerks and municipal clerks and</p> <p>20 other election officials dated June 24th.</p> <p>21 Ms. Wolfe, your last answer was a helpful</p> <p>22 segue. On June 24th, was the governor's</p> <p>23 stay-at-home order still in effect -- excuse me --</p> <p>24 safer-at-home order, was it still in effect?</p> <p>25 A. No, it was not. We did continue to consult</p>
22	<p>1 I -- I -- a version of it was. I don't know if it</p> <p>2 was this exact wording.</p> <p>3 Q. And so this motion, at least as worded here,</p> <p>4 would require local election officials to send</p> <p>5 absentee ballots to certain care facilities rather</p> <p>6 than sending special voting deputies; is that</p> <p>7 correct?</p> <p>8 A. It ultimately -- procedurally, how the</p> <p>9 implementation happened is it allowed e-clerks to</p> <p>10 bypass the mandatory two attempted visits to a care</p> <p>11 facility before they could mail the residents their</p> <p>12 ballots. And it skipped right to allowing them to</p> <p>13 mail the residents their ballots so they could get</p> <p>14 them in a timely fashion just like all of us.</p> <p>15 Q. And that's not the usual practice, is it?</p> <p>16 A. That's correct. The law mandates that each</p> <p>17 municipality needs to designate two special voting</p> <p>18 deputies to attempt two visits to the care</p> <p>19 facilities that qualify before they mail ballots.</p> <p>20 Q. But the Commission decided that in the</p> <p>21 context of the COVID pandemic, it would authorize</p> <p>22 election officials to take a different approach; is</p> <p>23 that correct?</p> <p>24 A. In light of the executive order, it was our</p> <p>25 understanding that nonessential personnel would not</p>	24	<p>1 with public health officials about the guidance from</p> <p>2 the accreditation and quality assurance programs</p> <p>3 that accredits care facilities in preparing this</p> <p>4 memo.</p> <p>5 Q. I want to direct your attention to the first</p> <p>6 two sentences of the memo where it says, The</p> <p>7 Wisconsin Elections Commission today directed that</p> <p>8 municipal clerks shall not send special voting</p> <p>9 deputies into care facilities for the remaining</p> <p>10 elections in 2020. The Commission directed that</p> <p>11 local election officials shall instead mail an</p> <p>12 absentee ballot to those registered voters who</p> <p>13 reside in care facilities that are typically served</p> <p>14 by SVDs if they request an absentee ballot or have</p> <p>15 an active request on file.</p> <p>16 Ms. Wolfe, can we agree that the language</p> <p>17 used in the passage I just read where the WEC</p> <p>18 directs clerks as to what they shall do is mandatory</p> <p>19 language; in other words, it is not language that</p> <p>20 leaves discretion to the recipients of this memo?</p> <p>21 A. We wouldn't have any ability to enforce</p> <p>22 that. You know, looking at that now, I would hope</p> <p>23 that you and everyone would recognize the number of</p> <p>24 communications we have to put out literally in the</p> <p>25 middle of the night to address changes or court</p>

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7 (25 to 28)

25	<p>1 decisions or commission decisions and we may not 2 have chosen our words as carefully as I wish we had. 3 Q. So is your testimony that this memorandum 4 that was sent to all election officials on this date 5 is inaccurate? 6 MR. GAHNZ: Objection; argumentative. 7 You may answer. 8 A. No, it's not inaccurate. We were trying to 9 speak in a way that was direct and understandable. 10 Q. And that language directed municipal clerks 11 as to what they shall not do; correct? 12 A. That is how we phrased it, that's correct. 13 Q. Okay. And is the reason that the Commission 14 issued this memorandum because it determined that it 15 was important to protect the safety of people who 16 were living in those care communities? 17 A. I cannot speak to the thought process of 18 individual commissioners or of all six of them as a 19 body; but based on the publicly available 20 discussions, that was certainly an item that they 21 discussed and came to this decision. 22 Q. Were there other reasons to send this 23 memorandum to election officials? 24 A. I'm sorry. I don't quite understand your 25 question.</p>	27	<p>1 opinions are properly implemented throughout the 2 state? 3 A. I don't believe we would have any way to 4 enforce that. That would have to continue through 5 the judicial process if there were clerks that 6 weren't adhering are to a ruling. We ... 7 Q. Okay. So it's not the Commission's 8 responsibility in your view to ensure compliance 9 with judicial decisions throughout the state? 10 A. I don't know what mechanism you're 11 suggesting by which we'd be able to do that other 12 than the complaint process. 13 MR. SCHWARTZTOL: Can we pull up Exhibit 5, 14 please? 15 VIDEO TECH: Yes, sir. 16 (Exhibit 5 was marked for identification 17 and is attached to the transcript.) 18 VIDEO TECH: Exhibit No. 5 for the record. 19 BY MR. SCHWARTZTOL: 20 Q. This is a June 30th memorandum from 21 Ms. Wolfe to all Wisconsin election officials 22 regarding the 7th Circuit's ruling in the One 23 Wisconsin Institute case. 24 Ms. Wolfe, let me ask you first, is this 25 memorandum still operative, still in effect?</p>
26	<p>1 Q. Were there reasons other than protecting the 2 safety of people living in care facilities for 3 sending this memorandum directing municipal clerks 4 not to send special voting deputies into care 5 facilities? 6 A. The reason was to alert them to the 7 Commission's decision. And I believe we promised 8 additional guidance on how the implementation would 9 happen, but it was to provide them with some initial 10 information about the decision of the Commission. 11 Q. Do the WEC's responsibility include ensuring 12 that judicial decisions that bind the Commission 13 regarding election administration are properly 14 implemented throughout the state? 15 A. It is the Commission's responsibility to 16 ensure that we provide guidance documentation 17 information about that. Obviously, we're not in 18 each of the 1850 municipalities or the 3,000 polling 19 places, so, you know, it relies on a complaint 20 process for people to tell us and then for issues to 21 be brought to the attention of the Commission for 22 consideration. 23 Q. And when those issues are brought before the 24 Commission for consideration, is it the Commission's 25 responsibility to ensure that binding judicial</p>	28	<p>1 A. No. No, it is not. 2 Q. And can you just explain why it's not 3 currently in effect? 4 A. Yes. We received further analysis from our 5 counsel that the decision of the 7th Circuit was not 6 in effect until they issue a mandate. 7 Q. Okay. Do you expect once a mandate is 8 issued to put out a new memorandum along these 9 lines? 10 A. Yes, we would put out a memorandum to clerks 11 letting them know any additional details of the 7th 12 Circuit's mandate. 13 MR. SCHWARTZTOL: Let's scroll down to the 14 second page, please. 15 Q. The final bullet there which refers to other 16 changes in election law, do you know which changes 17 to election law that bullet is referring to? 18 A. Yes. As the sentence goes on to explain, 19 including issues with the university ID card as 20 proof of residence and the ID petition process at 21 the DMV. 22 Q. And which election officials are typically 23 responsible for administering any laws, for example, 24 relating to whether university IDs satisfy voter ID 25 requirements?</p>

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8 (29 to 32)

29	31
<p>1 A. The municipal clerk has the statutory 2 responsibility to determine whether or not a photo 3 ID complies with the law when they're making 4 decisions, such as if the ID is acceptable for a 5 voter to vote in-person at the polling place on 6 election day or when they're reviewing that ID to 7 issue an absentee ballot. So they're the ones that 8 are making that determination if the ID complies and 9 they're able to issue a ballot to that voter.</p> <p>10 Q. The other issues addressed in this 11 memorandum, such as the designation of in-person 12 absentee voting sites, are those areas that are also 13 typically administered in the first instance by 14 municipal clerks?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know whether the members of the 17 Commission were defendants in the lawsuits that gave 18 rise to this appeal in the 7th Circuit?</p> <p>19 A. I'm sorry. I do not know exactly who was 20 named in each of the many lawsuits.</p> <p>21 Q. Do you know whether the members of the 22 Commission were named as defendants in any of them?</p> <p>23 A. Yes, I believe so.</p> <p>24 Q. Do you know whether any local election 25 officials were named as defendants in these</p>	<p>1 Q. The Commission is planning to issue 2 subgrants lead-up to the 2020 election; is that 3 correct?</p> <p>4 A. We have. We've been actively doing that for 5 the last few years.</p> <p>6 Q. Has the Commission previously issued grants 7 or subgrants to local election officials?</p> <p>8 A. Yes. From what I understand, it's been a 9 long historical practice starting with the original 10 HAVA funding.</p> <p>11 Q. Can the Commission attach funding to those 12 grants or subgrants?</p> <p>13 A. Yes, but you have to carefully weigh whether 14 or not that will become a hindrance to people 15 applying for the grants.</p> <p>16 Q. Understood. Sometimes it will be a good 17 idea or a bad idea, but the Commission can do it?</p> <p>18 A. Within reason, yes.</p> <p>19 Q. Can the Commission produce training 20 materials for local election officials?</p> <p>21 A. Yes, and we do; and it's also one of our 22 responsibilities under state statute.</p> <p>23 Q. Can it publish best practices on various 24 issues of election administration?</p> <p>25 A. Yes.</p>
30	32
<p>1 lawsuits?</p> <p>2 A. I would have to take a look at the list. I 3 don't know off the top of my head.</p> <p>4 Q. Is it safe to say that the 1900-plus local 5 election officials were not all named as defendants 6 in any of these lawsuits?</p> <p>7 A. I believe that to be true, yes.</p> <p>8 Q. Do you believe that it's the WEC's 9 responsibility to ensure that all local election 10 officials know the consequences of the 7th Circuit's 11 ruling?</p> <p>12 A. Yes.</p> <p>13 Q. Ms. Wolfe, does the Commission have 14 authority to issue subgrants to fund initiatives 15 that local election officials implement?</p> <p>16 A. Yes. Well, we have done that. We believe 17 that that is in accordance with the federal grant's 18 provisions.</p> <p>19 Q. Beyond specific federal grant provisions, 20 does the Commission have authority to issue grants 21 or other funding to local election officials?</p> <p>22 A. While I know most of chapters 5 through 12, 23 there's always some that surprise me sometimes. I 24 don't believe we have explicit statutory authority 25 to issue subgrants.</p>	<p>1 Q. And, presumably, there's no limit on how 2 specific those best practices can be; is that right?</p> <p>3 A. As long as they're within the constructs of 4 the law.</p> <p>5 Q. Can the Commission review and offer feedback 6 or guidance to local election officials on their 7 plans for administering elections?</p> <p>8 A. It's -- local election officials will call 9 our office to get our take on whether or not the 10 plans that they are formulating, if we believe that 11 they comply with law. But, ultimately, we're not 12 making the decision. They're making the decision on 13 whether or not it complies. But we can certainly 14 brainstorm with them as fellow election geeks.</p> <p>15 Q. So local election officials will, from time 16 to time, reach out to the Commission to ask for 17 feedback on their plans; right?</p> <p>18 A. Commission staff, not necessarily the 19 Commission as a body.</p> <p>20 Q. And is there any reason why the Commission 21 couldn't systematically invite local election 22 officials to share their plans with respect to an 23 upcoming election so that the Commission or the 24 Commission staff could provide feedback?</p> <p>25 A. If you would clarify, is your suggestion</p>

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33	<p>1 that all 1850 of them would have to submit a plan to 2 us to review with a staff of 30? 3 Q. No. My question is sometimes, as you just 4 testified, local election officials will initiate a 5 discussion where they seek feedback on their plans; 6 is that right? 7 A. Yes. 8 Q. Is there any reason why the Commission 9 couldn't take the initiative in inviting local 10 election officials to seek feedback or guidance on 11 specific planning? 12 A. I believe if all 1850 did that, I don't know 13 how we would handle that. It's a very, very small 14 agency. 15 Q. So as a practical matter, there may be -- 16 let me withdraw that. 17 Okay. Can the Commission make available 18 information or guidance from subject matter experts 19 such as experts on epidemiology to local election 20 officials? 21 A. Yes. 22 Q. Can it provide local election officials with 23 public education or outreach materials? 24 A. Again, I don't know that these are 25 explicitly outlined in the statute as something that</p>	35
34	<p>1 we're allowed to do, but that is a practice, yes. 2 Q. And, presumably, the Commission all the time 3 takes action or engages in activities that are 4 consistent with its mission but not explicitly 5 enumerated in the statute; isn't that right? 6 A. You probably know as well as I do that some 7 statutes are very specific about authority and some 8 are more vague, but we always believe that we're 9 operating within our statutory authority. 10 Q. Including where you have broad statutory 11 authority; correct? 12 A. In some areas, yes. 13 Q. Can the Commission work with local election 14 officials to design poll worker recruitment 15 programs? 16 A. I don't know if program is the right word 17 for it, but the Commission has provided tools that 18 the local election officials can leverage in 19 developing and implementing their own poll worker 20 recruitment efforts. 21 Q. Can it set goals that local election 22 officials could use to measure their own progress? 23 A. In the form of a best practice perhaps, yes. 24 Q. And I just want to go back for a moment to 25 the conversation we had about the role of the</p>	36
	<p>1 Commission offering feedback to local election 2 officials on their planning and your testimony a 3 moment ago about the practical difficulties of 4 providing that feedback to all 1850 municipalities. 5 I just have one clarifying question. 6 Is there any reason that the Commission 7 could not identify municipalities that might face 8 the most significant challenges in an election, and 9 on its own initiative, on the Commission's 10 initiative, invite those municipalities to share 11 their plans for the Commission' review and feedback? 12 A. I believe identifying those with a specific 13 challenge may be challenging. Again, often that 14 type of information is going to come to us through 15 the form of a complaint or other information that 16 our agency receives. So I -- the plan you suggest 17 sounds very subjective, and I think we'd want to 18 have some more defined terms before we considered a 19 program like that. 20 Q. Let's make this more concrete. In the 21 context of planning for the November election, is 22 the process of identifying municipalities that may 23 face particular challenges in administering their 24 election something that's beyond the Commission's 25 capacity to do?</p>	
	<p>1 MR. GAHNZ: Object to the form. 2 A. I can't answer without knowing what the 3 program you suggest, sort of, looks like. I can't 4 really answer what our -- I haven't done an analysis 5 of our resource allocation, if we'd have capacity. 6 Q. Is the Commission and the Commission staff 7 in a position to identify the municipalities that 8 may face the most significant challenges in 9 administering the November election this year? 10 A. It depends on the type of challenge. There 11 are many different challenges faced by 12 municipalities; and depending on the size of the 13 jurisdiction, their challenges may look very 14 different. So if it was a specific challenge that, 15 you know, was faced by a certain size jurisdiction, 16 let's say, or something where we're able to pull a 17 report, then we could consider options for reaching 18 out to them if it was, you know, a feasible number 19 of jurisdictions. 20 Q. Let's make it even more concrete. In the 21 context of identifying municipalities that are most 22 likely to face challenges in administering an 23 election in November that allows voters to safely 24 and effectively participate during the COVID 25 pandemic, is the Commission equipped to identify</p>	

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10 (37 to 40)

37	<p>1 which jurisdictions are most likely to be facing 2 those challenges? 3 MR. GAHNZ: Object to the form. 4 A. I'm not sure. I'm sorry. 5 Q. Okay. If the Commission had identified 6 jurisdictions that need that support, there's 7 nothing stopping it from affirmatively reaching out 8 to offer review and feedback on their planning 9 process; correct? 10 A. Correct. 11 MR. SCHWARTZTOL: Let's pull up Exhibit 6. 12 (Exhibit 6 was marked for identification 13 and is attached to the transcript.) 14 VIDEO TECH: Exhibit No. 6 for the record. 15 MR. SCHWARTZTOL: So I will note that this 16 was previously introduced in Ms. Wolfe's first 17 deposition on July 3rd, this document. But because 18 we have a different court reporter at this 19 deposition and don't have a continuously numbered 20 set of exhibits, I'm going to reintroduce it here 21 for ease of reference. 22 Q. Ms. Wolfe, are you familiar with this 23 document? 24 A. I am. 25 Q. The April 7, 2020 absentee voting report?</p>	39	<p>1 absentee report has been relevant to the 2 Commission's planning for the November election? 3 A. Yes. 4 Q. Would you say it's the WEC's main source of 5 information about how absentee voting either worked 6 or failed to work in the April election? 7 A. Yes. But as with anything, I mean, if new 8 information comes our way, that is absolutely 9 considered as well. 10 Q. Understood. 11 MR. SCHWARTZTOL: I'm going to ask to bring 12 the document back up and to scroll to page 6 of the 13 document. 14 Q. Ms. Wolfe, I want to draw your attention to, 15 I guess it's the long paragraph of text that appears 16 on that page and, in particular, the second sentence 17 there where it says, While almost 90 percent of 18 ballots were returned and counted, approximately 1 19 in 10 ballots were either not returned to the clerk 20 or were returned but rejected. 21 And I'm going to ask you a question, but I 22 want to first also draw your attention to page 7, 23 the top paragraph and the second sentence where it 24 says, Both the ballot rejection and unreturned 25 ballot rates were consistent with or lower than the</p>
38	<p>1 A. Yes. 2 Q. Would you agree that absentee voting is 3 going to be a major part of how Wisconsin voters 4 participate in this November's election? 5 A. I wish I had a way to better forecast what 6 that voter behavior will look like in the fall or in 7 the future, but we are certainly planning to have 8 high levels and making sure that all options are 9 made as accessible -- that we are addressing, you 10 know, any issues in all areas of voting that are 11 needed for -- as we prepare for the fall. 12 Q. Understood. And nobody has a crystal ball. 13 But in the planning that you and your staff are 14 doing between now and November, do you agree that 15 absentee voting -- let me withdraw that. 16 In the planning that you and your staff are 17 doing between now and November, are you anticipating 18 that absentee voting is going to be a major part of 19 how Wisconsin voters participate in the election? 20 A. The Commission has directed staff to 21 implement the plan that was submitted to the courts, 22 and you'll see that absentee voting and some of the 23 processes that supported are featured prominently 24 there. 25 Q. Is it fair to say that the April 7th</p>	40	<p>1 previous rates. 2 Those two propositions that I just read out 3 loud, are they consistent with your understanding of 4 absentee voting rates in April and how they compared 5 to previous -- excuse me -- are they consistent with 6 your understanding of absentee ballot rejection 7 rates and how those rates compared with previous 8 years? 9 A. I believe the data presented in the report 10 to be factual. 11 Q. I'm going to go back to page 6 and ask you 12 to take a look at table 4. 13 So this indicates that between April of 2016 14 and April of 2019, between about 73 percent and 15 about 90 percent of voters voted in-person at 16 polling places; is that correct? 17 A. According to the data presented, yes. 18 Q. And it also indicates that in April of this 19 year, those proportions essentially inverted 20 themselves so that about a quarter of voters 21 participated in-person on election day with the rest 22 voting by absentee, and the lion's share of those 23 voters using vote by mail; is that correct? 24 A. Again, I believe the data that's presented 25 there is correct, yes.</p>

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11 (41 to 44)

41	<p>1 Q. So I want to ask you to help me understand 2 how the rejection rates in this April election were, 3 in the words of the report, consistent with or below 4 the rates in prior years. 5 So just for example, if we look at 6 April 2016, where about 10 percent -- according to 7 the data here, about 10 percent of voters 8 participated via absentee ballot; correct? 9 A. Yes, correct. 10 Q. And so a 10-percent rejection rate would 11 mean that about 10 percent of those 10 percent of 12 ballots were rejected; correct? 13 A. Yes, correct. 14 Q. Okay. And I'm going to get out at the edge 15 of my, sort of, mathematical skills here, but 16 another way of expressing that is to say that the 17 rejection rate overall was about 1 percent of 18 ballots cast; is that correct? 19 A. I -- I will trust your math, but I don't 20 have a way to verify that right now. 21 Q. Okay. And in contrast, if we're looking at 22 April of this year, a 10-percent rejection rate 23 would be 10 percent of the 75 percent of ballots 24 that were cast as absentee; is that correct? 25 MR. GAHNZ: Object to the form of the</p>	43	<p>1 on by-mail ballots. I'm not sure that that number 2 includes the in-person absentee where you're not 3 going to be issues like rejecting a ballot for being 4 late or not having the witness requirements. So it 5 might refer to that 61.8 percent; and without having 6 to look into it, I'm not sure. 7 Q. So it is either 10 percent of 61.8 percent 8 or 10 percent of 75 percent; is that fair? 9 A. Yes, I would say that is. 10 Q. Do you remember testifying in your July 3rd 11 deposition that a person who requests an absentee 12 ballot but whose ballot is not received by a 13 municipal clerk before election day still has the 14 option to vote in-person under certain 15 circumstances? 16 A. Under certain circumstances, yes. 17 Q. So, for example, if we're looking again at 18 table 4, at the bar for April of 2016, of those 19 1 percent of ballots cast that were rejected, it's 20 possible that some number of those people 21 subsequently showed up to vote on election day; is 22 that correct? 23 A. Could I see -- could I just see the chart 24 that shows the rejection rates, or do you want to 25 stay here? I don't know that I'm quite following.</p>
42	<p>1 question. 2 A. I'm sorry. I would need to see the actual 3 data itself. Just based on my limited math skills, 4 that doesn't quite sound right to me, but I would 5 want to verify that before vouching for it. 6 Q. I won't have us get too deep into the 7 arithmetic here, but you testified a moment ago that 8 you believe the data in this table is correct; is 9 that right? 10 A. Yes, sir, I believe it to be correct, but 11 75 percent didn't sound accurate. I'm not sure 12 where you're getting that from. 13 Q. Okay. And looking at the April 2020 bar 14 graph, it shows at the top about 25 percent -- just 15 over 25 percent of voters participated on election 16 day; correct? 17 A. Yes. 18 Q. So the remaining share of voters is 19 75 percent of voters; correct? 20 A. About, yes, uh-huh. 21 Q. So a 10-percent rejection rate of absentee 22 ballots translates to 10 percent of those 75 percent 23 of the overall ballots that were cast; correct? 24 A. I'm sorry. I'd have to look at how we 25 classified the rejection rate data. It may be based</p>	44	<p>1 And, you know, accuracy of data is obviously 2 incredibly important, so I don't want to make any 3 assumptions without being sure. 4 Q. Of course. So I'll refer you first to the 5 text that you read earlier on that page where it 6 says that 1 in 10 ballots were either not returned 7 to the clerk or were returned but rejected. And 8 then I believe it's table 5 right below that that 9 reflects that data. 10 A. Thank you. Could you repeat your question? 11 Q. Could I ask for it read back? 12 (Record read as requested.) 13 A. I'm sorry. I don't know. And I know that 14 my understanding of this and how I'm thinking about 15 it is kind of in the weeds, but I don't know if -- 16 this is ultimately reflecting participation, meaning 17 that that's the number of people that cast their 18 ballot that way, if that were the case, that this is 19 reflecting voting method by ultimate reported 20 participation, then no, people that voted, they 21 wouldn't have had an opportunity to vote two ways, 22 if that makes sense. They wouldn't have 23 participation recorded two ways. 24 Q. Understood. So going back to this assertion 25 in the report that we looked at earlier that the</p>

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12 (45 to 48)

45	47
<p>1 ballot rejection and unreturned ballot rates were 2 consistent with or lower than previous rates in 3 previous years, that 10-percent rejection rate is 4 10 percent of the ballots that were cast either by 5 mail or in-person absentee; right? 6 A. I -- that's how it's presented in that 7 paragraph that you pointed me to. I would have to 8 see even more granular level of detail because some 9 of those scenarios that discuss rejection reasons 10 are not things that would occur during in-person 11 absentee. But yes, it appears that that is 12 accurate. 13 Q. And so based on the data here for the 14 elections between April 2016 and April 2019, we 15 would be talking about 10 percent of, in April 2016, 16 about 10 percent; in April 2017, about 10 percent of 17 12 percent; in April 2018, about 10 percent of, 18 again, 10 percent; is that correct? 19 A. Having a little bit of a hard time following 20 that, but I believe that's correct. 21 Q. Okay. So when the Commission's report says 22 that the absentee ballot rejection rate in April of 23 this year was consistent with or lower than previous 24 rates, that's not really an apples-to-apples 25 comparison, is it?</p>	<p>1 the court in the consolidated cases here. This was 2 also introduced, Ms. Wolfe, in your earlier 3 deposition. I wanted to pull this up as an exhibit 4 in case you need to refer to it. I'm going to ask 5 mainly some big-picture questions on it. I think we 6 can take it down off the screen for now, but don't 7 hesitate, Ms. Wolfe, if you want to refer to it in 8 answering any of the questions that I ask. 9 So we touched on this a little bit earlier; 10 but as part of the planning activity reflected in 11 this report, the Commission is issuing subgrants to 12 local election officials to assist with planning for 13 the November election; correct? 14 A. Correct. 15 Q. Has the Commission attached any requirements 16 on municipalities who receive those grants, any 17 conditions of those subgrants? 18 A. Yes. We have about four subgrants running 19 right now, so I'd need a refresher on the terms of 20 each one, but yes. 21 Q. Okay. 22 MR. SCHWARTZTOL: So let me ask to bring the 23 exhibit back up on the screen and scroll to page 5. 24 Q. So I want to ask, Ms. Wolfe, about the 25 subgrants that were issued pursuant to the CARES Act</p>
46	48
<p>1 MR. GAHNZ: Object to the form. 2 A. Rates reflecting percentage, that is true. 3 So how we presented the data as a percentage, the 4 percentages are accurate and consistent. 5 Q. But in April of this year was a very 6 different percentage of the overall number of 7 ballots cast; correct? 8 A. Correct. 9 Q. Okay. Do you think that that's a sound 10 analysis for the WEC to be relying on in planning 11 for the November election, the analysis reflected 12 here? 13 MR. GAHNZ: Object to the form; 14 argumentative. 15 You may answer. 16 A. This report was approved and accepted by the 17 Commission. 18 MR. SCHWARTZTOL: Let's pull up Exhibit 7, 19 please. 20 VIDEO TECH: Yes, sir. 21 (Exhibit 7 was marked for identification 22 and is attached to the transcript.) 23 VIDEO TECH: Exhibit No. 7 for the record. 24 BY MR. SCHWARTZTOL: 25 Q. This is the Commission's June 25th report to</p>	<p>1 grant money in particular. 2 A. Okay. 3 Q. With respect to those subgrants, has the 4 Commission attached any requirements on 5 municipalities who received those subgrants? 6 A. Well, all federal reporting requirements, 7 all requirements of the grants. There are many 8 requirements any time you're dealing with federal 9 funds. 10 Q. Do any of those requirements include 11 specific actions that those municipalities may take 12 in administering the November election? 13 A. Well, under the federal requirements, it's 14 my understanding that they must be used to make sure 15 that they have -- to improve their administration of 16 the August and November elections in light of the 17 current pandemic. 18 Q. Are there any specific practices that are 19 conditions of the receipt of those subgrants? 20 A. Well, yes, it can't be outside of that 21 framework, so it's quite a specific group of things 22 that these funds can be used for. 23 Q. What are some of those requirements? 24 A. Again, to prepare the administration of 25 election for the remaining 2020 election cycle, for</p>

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13 (49 to 52)

49	<p>1 needs -- new needs that have developed in light of 2 the current pandemic, so things like ensuring that 3 they have enough postage, envelopes for increase in 4 by-mail absentee. It could be things like staffing 5 to ensure that they have staff to adapt to the new 6 process or to adapt a new process for in-person 7 voting like having to have additional roles to focus 8 on sanitation, social distancing. So it's to make 9 sure that they have the resources they need to 10 administer the remaining elections in light of the 11 pandemic. 12 Q. Those examples that you just gave, 13 sufficient postage or sufficient staffing, are those 14 illustrative examples of things that municipalities 15 could, in their discretion, choose to do with these 16 funds, or are those specific examples of things 17 required as a condition of the subgrant? 18 A. They have a list of things that they can 19 choose from to utilize these funds for. In contrast 20 to other grants, it's a pretty limited list of what 21 they can use them on. What I mentioned is not an 22 exhaustive list of what the federal grant allows. 23 Q. So you're referring -- in subparagraph D 24 here of the report, are you referring to the 25 allowable uses of the subgrant?</p>	51	<p>1 sufficient social distancing at polling places; 2 correct? 3 A. Correct. 4 Q. And there's no specific conditions requiring 5 local election officials to ensure an adequate 6 number of polling places; correct? 7 A. I'm not sure -- there's no statutory 8 definition about something like that, but, correct, 9 there is not that type of condition. 10 Q. No condition that recipients ensure the 11 proper use of PPE at polling places; correct? 12 A. That definition changes every day, but 13 correct. 14 Q. No requirement that they provide their plans 15 advance to the WEC for assistance or feedback; 16 correct? 17 A. Correct. 18 Q. No requirement that they engage in any voter 19 education efforts; correct? 20 A. Correct. 21 Q. No requirement that they use practices that 22 promote social distancing like the use of drop boxes 23 for early in-person voting; correct? 24 A. That is not a requirement, correct. 25 Q. Has the Commission issued any directives or</p>
50	<p>1 A. Yes, that's correct. 2 Q. Okay. And we can scroll down a little bit 3 if that's helpful. 4 Are there any allowable uses that are not 5 listed in the text of this report? I know we may 6 need to scroll to the next page. 7 A. There may be things that aren't listed in 8 this report; but, of course, in other materials 9 provided to the clerks about the subgrants, they're 10 aware of the full terms of the subgrant itself -- or 11 of the federal grant itself. 12 Q. So local election officials can pick and 13 choose; right? Some might use them for additional 14 ballot supplies; some might use them for printing 15 and postage costs; others might use them for 16 additional cleaning supplies; but there are no 17 specific requirements about any of those uses being 18 mandatory; is that right? 19 A. That is correct, but they would have to 20 return the funds if they didn't use them on an 21 allowable expense. So I don't know why they would 22 ask for the funds if they weren't going to use them 23 for one of the few things on the list. 24 Q. There were no specific conditions connected 25 to those subgrants requiring, for example,</p>	52	<p>1 guidance specifically identifying the practices -- 2 the best practices for making in-person voting safe? 3 A. Yes, but it is a work in progress, and we'll 4 re-visit it before each election. So what was 5 appropriate in April may need to be completely 6 revamped as we head into November, so it's a dynamic 7 process that we're constantly updating and 8 supplementing. 9 MR. SCHWARTZTOL: We can take the exhibit 10 down off the screen. 11 VIDEO TECH: Thank you. 12 BY MR. SCHWARTZTOL: 13 Q. Has the Commission issued any such guidance 14 with respect to the November election? 15 A. Not yet. That sounds like a fool's errand. 16 We'll need to wait until we get closer to November 17 to know what the current CDC and health guidance is. 18 We are working on April 11th, the election we have 19 in three weeks. 20 Q. On August 11th? 21 A. Or yes. Yes, thank you. 22 Q. Has guidance with respect to the August 11th 23 election been issued yet? 24 A. We had a webinar just yesterday to start 25 that process of issuing that guidance. We had a</p>

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14 (53 to 56)

53	<p>1 call with the public health official yesterday to 2 work on making sure it's all up-to-date, so yes. 3 Q. Has the Commission taken any action to 4 assess whether local election officials are engaging 5 in robust efforts at recruiting and training poll 6 workers in advance of the November election? 7 A. Again, right now our focus has to be on the 8 August 11th election and making sure that they have 9 the resources they need. But we're in constant 10 communication with the locals to survey them and 11 make sure that they have what they need and to 12 provide them with tools for recruitment. So this is 13 a survey that we're continuing to do with the locals 14 for August and then we will continue for November. 15 Q. Okay. So sitting here today, the Commission 16 has not taken any action along those lines aimed at 17 the November election; correct? 18 A. I believe all of the recruitment efforts are 19 a wholistic approach for the 2020 election cycle, so 20 recruitment of poll workers, they're working on it 21 for this year. 22 Q. Yeah. I mean, you testified a moment ago 23 that it was premature to be engaging with local 24 election officials on their planning for November. 25 A. No, sir, that's not what I said. I said</p>	55	<p>1 process; through the state statutes, there's a 2 complaint process. I'm not intimately familiar if 3 there is a specific complaint process through the 4 Voting Rights Act. 5 Q. So let me clarify. I'm not asking about the 6 content of the Voting Rights Act. 7 Generally, with respect to the Commission's 8 authority to investigate whether local election 9 officials are properly administrating state and 10 federal election laws, that authority would include 11 the proper administration of the Voting Rights Act; 12 correct? 13 A. If someone were to file complaints alleging 14 a clerk not following a federal law, then yes. 15 Q. And same with the Americans With 16 Disabilities Act? 17 A. I believe so, yes. 18 Q. And same with the relevant provisions of the 19 U.S. Constitution? 20 A. I believe so. I'm not aware of that 21 particular instance, but I believe that to be true, 22 yes. 23 Q. Has the Commission used that authority to 24 initiate any investigations relating to the 25 April 2020 election?</p>
54	<p>1 that developing public health guidance this far in 2 advance -- 3 Q. Let me finish my question, and you can 4 clarify your earlier testimony if you want. 5 Let me withdraw that and reask it. 6 When is the Commission planning to focus on 7 engaging with local election officials specifically 8 for purposes of planning for the November election? 9 A. Upon the conclusion of the August 11th 10 election. And some of those are tied together 11 because August is the primary for November in some 12 contests, so there are many things that are tied 13 together in those plannings. 14 Q. The Commission has statutory authority to 15 carry out investigations to determine whether local 16 election officials are properly administering state 17 and federal law; correct? 18 A. Through the complaint process. If someone 19 issues a complaint, the Commission can consider the 20 information and issue a decision. 21 Q. Okay. And you testified earlier that that 22 could include compliance with the Voting Rights Act; 23 correct? 24 A. I don't know that that's a specific 25 mechanism. I know through HAVA there's a complaint</p>	56	<p>1 A. Could you be more specific? I'm sorry. 2 Q. Since the April 2020 election, has the 3 Commission taken any action pursuant to its 4 authority to investigate whether local election 5 officials are properly administering state and 6 federal election law? 7 A. The Commission has taken action on all 8 complaints that have been brought before it. 9 Q. Has it received complaints since the 10 April 2020 election? 11 A. Yes. 12 Q. And has it taken any investigative action in 13 response to those complaints related to the 14 April 2020 election? 15 A. The decisions of all the complaints that 16 have been brought before the Commission are a matter 17 of public record, so I can't speak to each of them, 18 but ... 19 Q. So other than what has been disclosed at 20 public commission meetings, for example, has the 21 Commission taken any other action pursuant to that 22 investigative authority since the April 2020 23 election? 24 A. Any consideration about any type of 25 investigation or complaints would all be a matter of</p>

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15 (57 to 60)

57	<p>1 public record and would be reflected in our 2 meetings. 3 Q. The Commission's June 25th submission to the 4 court indicates that among the things the Commission 5 is doing is engaging in efforts to educate voters on 6 unfamiliar aspects of voting. 7 Is that still among the activities that the 8 Commission is planning between now and November? 9 A. Yes, it is. 10 Q. And what will that initiative consist of? 11 A. So I believe this is outlined in the 12 reports. I guess it could be summarized as creating 13 tools to educate voters on the mechanics of 14 participating. We have done two statewide surveys 15 to understand how voters -- what information they're 16 seeking, where they seek that information. And so 17 based on that user feedback, we're able to create 18 tools that help to educate voters on information 19 that they're seeking. So it could take the form of 20 a video, social media plans, something like the 21 mailer that's going out, all sorts of different 22 efforts, a lot of tools for local election officials 23 as we find that voters have a trust with them, so a 24 variety of tools. 25 Q. Has the Commission completed that survey?</p>	59
58	<p>1 A. Yes. 2 Q. What did it find? 3 A. It's available publicly. So there's a lot 4 of different findings, but I would summarize it as 5 people want to know the mechanics of how voting 6 works. And, you know, we're just trying to find out 7 where they go for their information so we can put 8 our information in the right channel. 9 Q. Do you know how many voters were surveyed? 10 A. Not off the top of my head, I do not. 11 Q. Do you know order of magnitude? 12 A. It was statewide. I don't know. The 13 specifics are certainly available publicly. 14 Q. You don't know if it was hundreds, 15 thousands, tens of thousands? 16 A. I believe thousands, but I could -- I'm not 17 a hundred percent sure. 18 Q. Is there a decision yet about which 19 communications channels that campaign will make use 20 of? 21 A. So we created -- we're creating a variety of 22 things using different channels, so depending on -- 23 you know, not all voters go to the same source, so 24 we need to have a very dynamic approach. And that 25 was something that was important to the Commission</p>	60
	<p>1 when they originally passed that motion. So it will 2 be a variety of things and something where we'll 3 need to be able to change approaches quickly if 4 something changes in what voters are looking for. 5 Q. Is it going to include paid TV 6 advertisement? 7 A. As of right now, that's not part of it. 8 It's just so outside the reach of a state budget to 9 be able to do something like that. 10 Q. Is it going to include paid online 11 advertisement? 12 A. We have done that in the past. We're still 13 formulating final plans for -- as we head into 14 November. 15 Q. So it may or may not include paid online 16 advertising; is that right? 17 A. Correct. The Commission will have to 18 consider the plan and approve it. 19 Q. Is it going to include paid radio 20 advertising? 21 A. Again, we don't know yet, so the Commission 22 will have to consider the plan and sign off on it. 23 Q. Same with paid print advertising? 24 A. Correct. 25 Q. Do you know how much is being budgeted for</p>	

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16 (61 to 64)

61	63
<p>1 topics you described a moment ago like mechanics of 2 voting? 3 A. If it's security related. But if it was 4 more beyond that, more broad beyond improving our 5 state's cybersecurity posture, then there's some 6 grants that that might not be able to be used for. 7 So we'd have to look closely at the terms of the 8 various grants. The CARES grant potentially, yes, 9 but most of those funds have been used for the 10 improvements identified in the April 7th report and 11 the subgrants to municipalities. 12 Q. So with respect to the public education 13 effort that you described a few moments ago 14 addressing the mechanics of voting, it sounds like 15 there is not yet any budget designated for that 16 effort; is that correct? 17 A. Well, I also am not sure how much of a 18 budget it needs. A lot of it relies on getting 19 tools to local election officials to -- you know, 20 that's one of the benefits of having 1850 21 municipalities in 72 counties is that they have a 22 deep connection with their voters in their 23 jurisdictions, so providing them with tools is an 24 important part of the plan. 25 MR. SCHWARTZTOL: Can I ask the court</p>	<p>1 paid TV advertising will have a significant budget 2 impact, though; correct? 3 A. Yes. 4 Q. And your ability to use those tools will 5 depend on whether you have a budget to receive them; 6 is that correct? 7 A. Yes. 8 Q. Is there a launch date for this education 9 campaign? 10 A. There may be. Again, there have been over 11 20 commission meetings this year, and at some point 12 we've put together, sort of, a schedule of when we 13 think some of these efforts will come to life, but 14 they're mostly focused on November and getting the 15 tools out for November. 16 Q. Okay. So you're not aware right now the 17 launch dates for those efforts? 18 A. You know, it's not like a branding campaign. 19 We're not selling shampoo so there's not, like, a 20 date where we're going to do a big, flashy campaign. 21 It's evolving tools and efforts, and it will evolve 22 as people need information. 23 Q. Has the Commission at this point coordinated 24 with any outside nonprofit groups on how the public 25 education campaign will be conducted?</p>
62	64
<p>1 reporter to read back my last question? 2 (Record read as requested.) 3 BY MR. SCHWARTZTOL: 4 Q. I didn't hear a yes or a no to that. Is 5 that a yes or a no? 6 A. I'm not sure what the Commission has passed 7 in terms of our efforts that we're working on right 8 now. We've been working on developing the 9 materials, which obviously requires funding, so yes. 10 Yes, we have a designated fund for those efforts. 11 Q. I'm sorry, so what is the amount of the 12 funds designated for the voter outreach effort? 13 A. You'd have to take a look at our commission 14 meetings and materials. It's all presented as part 15 of that. 16 Q. You'd agree that the scale of any outreach 17 effort is going to be determined in significant part 18 by the amount of funding budgeted for it; correct? 19 A. Yes, correct. I hesitate because I don't 20 know that paid media is the best way to reach 21 people. That's not necessarily what our surveys 22 show. So scale sometimes is giving tools to your 23 local election officials. That's a really effective 24 way. 25 Q. Some tools like paid online advertising or</p>	<p>1 A. We worked with our ad agency to -- and a 2 data company -- that's probably not the right word 3 for it -- to conduct the survey and to provide 4 information, again, about our actual voters' 5 opinions and then used their expertise to determine 6 a path forward. 7 Q. It sounds like you haven't yet coordinated 8 with any nonprofit groups that might be partners in 9 this public education campaign; is that correct? 10 A. We also use the center for civic design -- 11 or for civic design a lot to help us with usability 12 because, again, we want to talk to actual voters. 13 We don't try to assume what voters need or want. We 14 do a lot of usability in our office, so yes, they've 15 been a partner of ours for a long time. 16 Q. What about grass-roots groups that work 17 directly with voters, have you coordinated with any 18 of them on this efforts? 19 A. We always make our tools available to any 20 groups that want to utilize them. So as you would 21 have seen with our photo ID effort to bring it to 22 the ballot campaign, we hope that everybody and 23 anyone uses the tools that we make available to help 24 us spread the word. So absolutely, once they're 25 available, we hope any groups that are willing will</p>

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17 (65 to 68)

65	67
<p>1 utilize them.</p> <p>2 Q. Once they're available anyone can use them,</p> <p>3 but you haven't yet coordinated with any of those</p> <p>4 groups about how they will use them; correct?</p> <p>5 A. Well, they're not completed yet, so no.</p> <p>6 Q. Okay. You haven't done any planning at this</p> <p>7 point with any of those groups about how to develop</p> <p>8 them or how to use them; correct?</p> <p>9 A. Well, we don't know what they are. But once</p> <p>10 we do, we will certainly coordinate. We talk to</p> <p>11 voter groups regularly and, you know, make sure that</p> <p>12 they're aware of our tools and our resources.</p> <p>13 Q. What about political campaigns? Have you</p> <p>14 done anything to coordinate with the political</p> <p>15 campaigns about the voter education efforts?</p> <p>16 A. In the past we have. So we'll have to bring</p> <p>17 to the Commission a distribution plan for their</p> <p>18 consideration once the tools are ready. But, again,</p> <p>19 you know, looking at photo ID or other campaigns in</p> <p>20 the past, we've certainly included parties and</p> <p>21 candidates as part of that as well.</p> <p>22 Q. Right now you haven't begun any of that</p> <p>23 coordination; correct?</p> <p>24 A. No. Until we have the tool kit ready, we</p> <p>25 wouldn't be coordinating.</p>	<p>1 specific analysis?</p> <p>2 A. If directed to do so by the Commission.</p> <p>3 Q. Right now you don't have any plans to</p> <p>4 conduct that analysis?</p> <p>5 A. I would argue that that is just part of the</p> <p>6 data set in a lot of ways because it's just opinions</p> <p>7 that -- we're not trying to sway the data. The data</p> <p>8 is the data. So if it shows that there's a certain</p> <p>9 group or area of voters that has specific concerns,</p> <p>10 that, of course, is information that will be</p> <p>11 provided to the Commission when they're making their</p> <p>12 decision.</p> <p>13 Q. So the raw data may be sufficient in your</p> <p>14 view?</p> <p>15 A. I'm not sure what you're suggesting that we</p> <p>16 do to the data beyond utilize what it tells us.</p> <p>17 Q. You testified a little earlier that the</p> <p>18 Commission is going to start its work preparing for</p> <p>19 the November election after the conclusion of the</p> <p>20 August 11th election.</p> <p>21 Do you remember that?</p> <p>22 A. I also said that there are many things that</p> <p>23 are tied between the August and November election.</p> <p>24 It depends on the specific preparations you're</p> <p>25 asking me about.</p>
66	68
<p>1 Q. And do you have any specific plans right now</p> <p>2 to do that?</p> <p>3 A. Again, that's something for the Commission's</p> <p>4 consideration for a future meeting. I'm sure that</p> <p>5 will be one of their agenda items.</p> <p>6 Q. In preparing the public education campaign,</p> <p>7 has the Commission conducted any study or analysis</p> <p>8 to determine what groups of voters are most likely</p> <p>9 to be deterred from voting in November under</p> <p>10 pandemic conditions?</p> <p>11 A. The survey asks questions about, you know,</p> <p>12 how voters -- voters' perceptions about voting and</p> <p>13 issues that they may have encountered so we can</p> <p>14 work, again, to develop materials to give them</p> <p>15 information about how it works or how their</p> <p>16 interaction may happen. So yes.</p> <p>17 Q. In using that data, have you conducted any</p> <p>18 analysis of which groups of voters are most likely</p> <p>19 to be deterred from voting in November?</p> <p>20 A. Again, this is something that will have to</p> <p>21 be put together. We'll have to complete our</p> <p>22 analysis, put together recommendations for the</p> <p>23 Commission's consideration, but all of that will be</p> <p>24 a part of that discussion.</p> <p>25 Q. Do you have any plans to conduct that</p>	<p>1 Q. So that's a yes, though, you recall that</p> <p>2 earlier testimony?</p> <p>3 A. I recall that. I believe you've taken it</p> <p>4 out of context.</p> <p>5 Q. Well, let me ask again, when does the</p> <p>6 Commission plan to begin work to prepare for the</p> <p>7 November election?</p> <p>8 MR. GAHNZ: Objection; asked and answered.</p> <p>9 You can answer again.</p> <p>10 A. I would be glad to talk about any specific</p> <p>11 areas of preparations and when those start. But</p> <p>12 some things are tied together between August and</p> <p>13 November. And others like public health guidance,</p> <p>14 we'd have to wait until closer to November to know</p> <p>15 what the accurate guidance is.</p> <p>16 Q. What are some of the things that are tied</p> <p>17 together?</p> <p>18 A. Well, if you take a look at the statutes,</p> <p>19 there's things like determining early voting sites</p> <p>20 or in-person absentee sites. The statutes kind of</p> <p>21 tie those two things together noticing them. There</p> <p>22 are, you know, potentially, like you said,</p> <p>23 recruitment efforts for poll workers. Those efforts</p> <p>24 don't just have to be for August. They can be</p> <p>25 working with people to get them trained and up to</p>

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18 (69 to 72)

69	<p>1 speed for both elections as more of a wholistic 2 approach. But then there's things like -- I always 3 talk about election security, or now with the 4 pandemic circumstances, these aren't things with a 5 finish line. They aren't things with a checkbox 6 that we can say we've done that, now we're good to 7 go. They're things that evolve every single day, so 8 we'll have to continue that as we get closer to 9 November. 10 Q. And is your role with the Commission a 11 full-time position? 12 A. Yes, times three. 13 Q. What is the earliest that you anticipate 14 beginning any preparation with local officials 15 that's specifically geared towards the November 16 election? 17 MR. GAHNZ: Objection; asked and answered. 18 A. Again, it depends on the specific efforts. 19 I would say there's some things where we've been 20 working on preparations with them for a year. 21 There's other things where we need to keep those 22 things fresh as we get closer to November. 23 Q. In preparing for the November election, has 24 the Commission collected data to determine whether 25 there were racial disparities in the ability to</p>	71	<p>1 April because of the pandemic conditions? 2 A. That's not data we would have available to 3 us to analyze. 4 Q. Has the Commission conducted any analysis to 5 determine which categories of voters -- and here I 6 mean by geography or race or age or any other 7 factor -- which category of voters are most likely 8 to be deterred from voting in November? 9 A. That's not data I have available. I can't 10 speak to that. 11 Q. Okay. So the Commission has not conducted 12 any analysis along those lines? 13 A. That is not data that's available to us. 14 That's not -- so no. 15 Q. In preparing for the November elections, has 16 the Commission sought to determine whether counties 17 that had higher rates of COVID-19 in April 18 experienced lower turnout than counties that had 19 lower rates of COVID-19? 20 A. Again, that is not data that's part of our 21 data set, so no. 22 Q. In preparing for the general election in 23 November, has the Commission studied the effects of 24 polling place closure on the safety of in-person 25 voting?</p>
70	<p>1 safely vote on April 7th? 2 A. The data sets for elections does not include 3 any demographic information, so that is not part of 4 the data set that we have. 5 Q. And so you haven't conducted any analysis 6 that would shed light on that question? 7 A. Correct. 8 Q. And the June 25th report does not identify 9 any measures that are specifically designed to 10 prevent racial disparities in the ability to vote 11 safely in November; correct? 12 A. Correct, that's not part of our data set. 13 Q. So the Commission is not taking any measures 14 that are specifically designed to prevent racial 15 disparities? 16 A. That is not data we have available to us, so 17 correct. 18 Q. In preparing for the November election, has 19 the Commission sought to determine whether the 20 voting conditions in April deterred participation 21 among voters? 22 A. That is not data we have available, so no. 23 Q. Okay. And so you haven't -- or the 24 Commission has not attempted to quantify the number 25 of voters who were deterred from participating in</p>	72	<p>1 A. The analysis that we've done is reflected in 2 our April 7th report, so, again, that's not data 3 that we would have available to us. 4 Q. Okay. And if -- for any of these things 5 that you're saying it's not data that you have 6 available to us, I take it to mean that that means 7 you have not conducted the analysis that I'm asking 8 about? 9 A. Correct, but I think you're suggesting that 10 we have some kind of data that we don't have that 11 isn't part of the statewide voter registration 12 database. 13 Q. Some of the subgrant funding that the 14 Commission is making available -- let me withdraw 15 that and ask it differently. 16 One of the allowable uses of the CARES Act 17 subgrant is the uses of drop boxes for in-person 18 absentee voting; correct? 19 A. I believe so, yes. 20 Q. So there's no question that this is feasible 21 for the Commission to provide funding or support to 22 enable the use of drop boxes by local election 23 officials; correct? 24 A. That would be an option available to them, 25 yes.</p>

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19 (73 to 76)

73	<p>1 Q. And is it safe to assume that if the 2 Commission is willing to fund the use of drop boxes, 3 that's because it thinks that the use of drop boxes 4 is going to be beneficial in the November election? 5 A. Because it's an allowable expense under the 6 grant. 7 Q. Does the Commission have a position on 8 whether the use of drop boxes is going to be 9 beneficial in the November election? 10 A. I don't recall if that's a specific item 11 that they've considered or made any motion on, but 12 it's included as part of what the municipalities can 13 use their subgrant funding for. 14 Q. Does the Commission have a view on whether 15 the use of drop boxes is one factor that helps to 16 enable socially distant voting? 17 A. That very specific item is not something 18 that I don't think they've taken a position on. I 19 believe that drop boxes and them as an option is 20 something that was provided as part of the best 21 practice guidance that was provided prior to April, 22 one of the options the jurisdiction may want to 23 consider. 24 Q. Best practice because it enables socially 25 distant voting; is that fair?</p>	75	<p>1 places, based on the public health checklist that we 2 put together with the public health department about 3 what are the things they need at their polling place 4 and how to make sure that they have enough. We also 5 have to rely on the counties as a bit of a conduit 6 between us and the municipalities because there's so 7 many of them. So we double-check the numbers when 8 they come back to make sure we don't think they've 9 estimated too low before putting in those orders. 10 Q. What kinds of things do you double-check? 11 A. To make sure that they would have enough of 12 all the supplies to be able to implement the 13 checklist in their polling places. 14 Q. Is the Commission conducting any analysis to 15 determine whether the needs based on those 16 self-assessments would actually reflect the most 17 efficient distribution of the supplies that the 18 Commission is planning to procure? 19 A. Yes. We have a checklist that says -- that 20 we worked with the public health official on to say 21 what the process, the work flow should be at the 22 polling places in terms of sanitizer, you know, 23 cleaning surfaces, social distancing. And so then 24 based on the number of polling places they plan to 25 have, poll workers, that we're able to make sure</p>
74	<p>1 A. It's a best practice that the jurisdiction 2 will have to consider based on their setup to make 3 sure that they're able to conduct safe voting. 4 Q. The June 25th report also states that the 5 Commission anticipates providing municipalities with 6 certain sanitation and PPE supplies based on a needs 7 survey. 8 Do you recall that? 9 A. Yes. 10 Q. Has the Commission conducted that survey 11 yet? 12 A. Yes. 13 Q. And what kinds of things did it learn? 14 A. Just the amount of supplies that we need so 15 that we can work through the state procurement 16 channels to get the supplies to the jurisdictions 17 and distribute them to them. 18 Q. So that's a survey of what each municipality 19 assesses to be its needs; is that correct? 20 A. Yes, that's correct. 21 Q. Has the Commission done any analysis beyond 22 collecting that self-assessment to determine what 23 the needs are in particular municipalities? 24 A. Yes. We make recommendations to the 25 municipalities based on the number of polling</p>	76	<p>1 they requested enough to be able to implement that. 2 Q. There's a specific amount of money set aside 3 for the procurement of these supplies; correct? 4 A. Yes, that's correct. 5 Q. Do you remember what that is? 6 A. I believe it's 500,000. 7 Q. I don't want to put you on the spot. I can 8 represent to you that that's what it says in the 9 report at least, the June 25th report. 10 Do you have any reason to think that 11 allotment has changed since the June 25th report? 12 A. I believe that to be accurate. 13 Q. So what will the Commission do if the total 14 need as reflected in those self-assessments exceeds 15 what the Commission can afford to procure based on 16 that budget? 17 A. Well, that certainly would be difficult; but 18 as we saw in April where all of this was unplanned, 19 we must find a way. And that's what we seem to be 20 quite skilled at is finding a way. So as of right 21 now, we have no reason to believe that's true. We 22 believe we have an adequate amount of funding set 23 aside, but we also recognize something else could 24 come up. 25 So there will likely be remaining grant</p>

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20 (77 to 80)

<p style="text-align: right;">77</p> <p>1 funds. You know, all 1850 jurisdictions don't 2 request their CARES Act funding. That means there 3 would be remaining funding that we'd be able to use. 4 Also, there are still some remaining funds from the 5 CARES grant that aren't specifically allocated or 6 allocated for things like staff time that we'd be 7 able to reallocate in the event of an emergency. 8 But we're also getting all the supplies before the 9 August election, and there will be a remaining 10 budget; so if there's a new need as we head into 11 November, we should still have some funding to help 12 address that. 13 Q. In assessing how to distribute those 14 supplies, is the Commission engaging in any analysis 15 of what each jurisdiction's experience looked like 16 in April? 17 A. We have -- we have many clerk feedback 18 groups where we're constantly talking to the clerks 19 about their experience and understanding what went 20 well, what didn't go well, and how we can adjust 21 things. So yes, I think the recommendations we made 22 about supplies or that the clerks are using to make 23 their order is based on their experience. 24 Q. I guess I'm asking is the Commission going 25 to make any independent assessment. Is it going to</p>	<p style="text-align: right;">79</p> <p>1 Q. So let me ask the question differently. 2 Prior to this April, would you agree that as 3 a practical matter, the way that absentee voters 4 complied with that requirement was by having direct, 5 in-person contact with the witness? 6 A. I don't have any data to support what method 7 voters were using to get their witness signature. 8 That's not a data point that's collected. Being 9 that I worked in voter services for a long time, 10 we've always had to help individual voters in 11 circumstances find a way that met the letter of the 12 law. So overseas citizens, military voters, there 13 have always been scenarios we've had to think 14 through to help them meet that requirement. 15 Q. Was the Commission aware that thousands of 16 voters in April believed that complying with the 17 witness signature requirement entailed direct, 18 in-person contact with the witness? 19 MR. GAHNZ: Object to the form; vague as to 20 when. 21 A. I don't know that the Commission was aware 22 of that specific data point or if that's even 23 available. 24 Q. Was the Commission aware in the lead-up to 25 the April election that there were voters who</p>
<p style="text-align: right;">78</p> <p>1 look at any particular municipality or county and 2 make an assessment of whether, in light of 3 difficulties that people had voting in that 4 jurisdiction in April or COVID-19 rates in those 5 jurisdictions, what the appropriate distribution of 6 supplies should be? 7 A. Again, for all of our jurisdictions, we're 8 using the best information we have, which is relying 9 on expertise of a public health official to help us 10 put together the checklist of what's needed and then 11 using that to make sure that they each have the 12 supplies that they need; though I think across the 13 board they all have needs for supplies, and we're 14 going to fill those scaled to what they need. 15 Q. Do you agree that the witness signature 16 requirement imposed by Section 6.87 of the Wisconsin 17 statutes has, at least as a practical matter, 18 historically required absentee voters to have 19 direct, in-person contact with the witness? 20 A. Well, the Commission has considered this. 21 And me being the representative of the Commission, 22 they directed staff to produce guidance about ways 23 to fulfill the witness requirements that may be 24 different than witnesses have considered in the 25 past.</p>	<p style="text-align: right;">80</p> <p>1 believed that complying with the statute required 2 them to have an in-person contact with a witness? 3 A. The Commission's staff and the Commission 4 received questions about that from voters about what 5 the requirements were. So I can't speak to every 6 e-mail or contact that we or the Commission received 7 from voters, but that may be among the types of 8 questions that were asked. 9 Q. Did the Commission have a concern in the 10 lead-up to the April election that enough voters 11 would believe that the witness requirement entailed 12 in-person contact with the witness, that a 13 significant number of voters believed that they were 14 unable to both participate in the election and 15 continue to self-isolate? 16 A. The Commission did direct staff to produce 17 guidance about ways that the witness requirement 18 could be accomplished utilizing the expertise of the 19 public health official, so that was a direction that 20 came from the Commission based on discussions. 21 Q. And is that because in-person contact is, by 22 definition, not a form of self-isolation? 23 A. I don't -- I can't -- I don't know how to 24 answer that. I don't know what the medical 25 definition of self-isolation is. I'm not sure.</p>

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21 (81 to 84)

81	83
<p>1 Q. As --</p> <p>2 A. (Inaudible.)</p> <p>3 Q. Sorry. Go ahead.</p> <p>4 A. I'm done. Please go ahead.</p> <p>5 Q. As the administrator of the WEC, were you</p> <p>6 not aware of the desire of a certain number of</p> <p>7 voters to ensure that they could self-isolate during</p> <p>8 the COVID-19 pandemic?</p> <p>9 MR. GAHNZ: Object to the form.</p> <p>10 A. I believe my previous answer still stands.</p> <p>11 I mean, we received contacts from voters in specific</p> <p>12 scenarios, and then the Commission directed us to</p> <p>13 produce guidance in coordination with the public</p> <p>14 health official.</p> <p>15 Q. Was the purpose of that guidance to enable</p> <p>16 voters to comply with the witness signature</p> <p>17 requirement without engaging in in-person contact</p> <p>18 with a witness?</p> <p>19 A. Yes.</p> <p>20 Q. Was it your understanding in the April</p> <p>21 election that there were significant numbers of</p> <p>22 older or immunocompromised voters who believed that</p> <p>23 they were unable to comply with that requirement</p> <p>24 without putting themselves in harm's way?</p> <p>25 MR. GAHNZ: Object to the form.</p>	<p>1 suspend the application of that statute for the</p> <p>2 November election; correct?</p> <p>3 A. That is correct.</p> <p>4 Q. And if the court in this case enjoined that</p> <p>5 statute's application during the November election,</p> <p>6 that would mean that immunocompromised or older</p> <p>7 voters could submit an absentee ballot without</p> <p>8 having to figure out a way to have a witness as part</p> <p>9 of that ballot process; correct?</p> <p>10 MR. GAHNZ: Object to the form of the</p> <p>11 question.</p> <p>12 You may answer if you can.</p> <p>13 A. We would implement any directive of the</p> <p>14 court.</p> <p>15 Q. If that was the court's directive, it would</p> <p>16 be clear that voting by absentee ballot does not</p> <p>17 require an in-person contact with the witness;</p> <p>18 correct?</p> <p>19 A. We would have to see what the court's</p> <p>20 decision was. I can't speculate what that would</p> <p>21 look like or how we would implement it.</p> <p>22 Q. If the court's directive were to enjoin the</p> <p>23 application of that statute, that would make it</p> <p>24 clear that voters can participate through absentee</p> <p>25 ballots without needing a witness signature;</p>
82	84
<p>1 A. The contacts we received from voters, again,</p> <p>2 led to the Commission's consideration, discussion,</p> <p>3 and then ultimate direction of production of the</p> <p>4 guidance we just discussed.</p> <p>5 Q. In planning for the November election, are</p> <p>6 you concerned that there will be a significant</p> <p>7 number of older or immunocompromised voters who</p> <p>8 believe that they cannot safely comply with the</p> <p>9 witness requirement?</p> <p>10 A. As a representative of the Commission, my</p> <p>11 beliefs aren't relevant, but I -- again, these are</p> <p>12 all items that the Commission will have to discuss;</p> <p>13 and if they direct staff to produce additional</p> <p>14 guidance, we will do that.</p> <p>15 Q. As a representative of the Commission, is</p> <p>16 the Commission proceeding from the assumption as it</p> <p>17 plans for the November election that a significant</p> <p>18 number of older or immunocompromised voters will</p> <p>19 believe that they cannot comply with the witness</p> <p>20 requirement without putting themselves in harm's</p> <p>21 way?</p> <p>22 A. That is a discussion that the Commission</p> <p>23 will have to continue to have as they consider, you</p> <p>24 know, guidance for the November election.</p> <p>25 Q. The Commission can't decide on its own to</p>	<p>1 correct?</p> <p>2 MR. GAHNZ: Object to the form. It's been</p> <p>3 asked and answered, it's vague, and it calls for</p> <p>4 speculation.</p> <p>5 But go ahead, Ms. Wolfe.</p> <p>6 A. Yeah, I'm sorry. I won't speculate about</p> <p>7 what the court ruling was, but we would do our best</p> <p>8 analysis and implement that as it was directed to</p> <p>9 us.</p> <p>10 Q. The June 25th report to the court includes a</p> <p>11 description of measures that the Commission plans to</p> <p>12 take with respect to poll worker recruitment and</p> <p>13 training; correct?</p> <p>14 A. Correct.</p> <p>15 Q. And in the lead-up to the April election,</p> <p>16 did the Commission take any action to try to assist</p> <p>17 local election officials with poll worker</p> <p>18 recruitment and training?</p> <p>19 A. Yes.</p> <p>20 Q. And did that include efforts at conducting</p> <p>21 outreach to college students and labor unions and</p> <p>22 state employees and others?</p> <p>23 A. Yes.</p> <p>24 Q. So you'd agree that even if poll worker</p> <p>25 recruitment is typically the business of local</p>

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22 (85 to 88)

85	<p>1 election officials, the Commission has tools 2 available to it to impact the number of poll workers 3 on election day; correct? 4 A. I don't know if we had an impact. I hope we 5 did, but I don't know. I don't know if our efforts 6 impacted their ability to recruit or if it was their 7 efforts. I certainly can't take credit for the 8 things they did at the local level, but we tried the 9 best we could to help. 10 Q. Fair enough. But was the purpose of 11 bringing those tools to bear and is the purpose of 12 the recruitment efforts leading up to November -- 13 let me break those apart. 14 Was the purpose of bringing those tools to 15 bear in April to have an impact on the number of 16 poll workers who would be available in April? 17 A. Yes. 18 Q. Yeah. And, presumably, that's the purpose 19 of any poll worker effort in anticipation of 20 November; correct? 21 A. Yes. 22 Q. So maybe that clarifies my earlier question, 23 which is that the Commission has tools available, 24 whether or not they will succeed in any instance, 25 but tools available that are designed to impact the</p>	87	<p>1 A. Uh-huh. 2 Q. And you'd agree that better social 3 distancing -- and, again, other things being 4 equal -- but better social distancing at polling 5 places creates a safer experience for voters and 6 poll workers; correct? 7 A. That is certainly prevalent in the guidance 8 we've received from public health officials and is 9 included in the guidance that's given to the clerks. 10 Q. And you'd agree that having safer 11 opportunities to vote will mean that more Wisconsin 12 voters are able to avoid having to choose between 13 their health and their right to vote in the November 14 election; correct? 15 A. I apologize. I'm struggling about how to 16 answer that from the Commission's perspective as 17 their representative. I would believe, based on 18 their discussions, that yes, that's correct. 19 Q. So would you agree that the Commission 20 should use all available tools to impact in a 21 positive way the number of poll workers available on 22 election day in November? 23 MR. GAHNZ: Object to the form. 24 A. The Commission, as we led up into April and 25 I think it continues into the fall, has directed</p>
86	<p>1 number of poll workers on election day; is that 2 fair? 3 A. Yes. 4 Q. And that there are circumstances where it's 5 appropriate for the Commission to work to increase 6 the number of poll workers; correct? 7 A. I mean, I think it's every single person in 8 Wisconsin's job to help make sure we've got enough 9 poll workers as we head into November, so yes. 10 Q. Yeah. And is it safe to say that's because 11 for the November elections, more poll workers will 12 allow municipalities to safely operate more polling 13 locations? 14 A. Yes. And in small communities, to even open 15 up a polling location. 16 Q. And would you agree that other things being 17 equal, more adequately-staffed polling locations 18 better enables social distancing at those polling 19 places? 20 A. Yes, although I think you could certainly -- 21 I don't think this would be the case, but if you had 22 too many poll workers, that wouldn't help accomplish 23 social distancing. 24 Q. Yeah. I guess that would be a good problem 25 to have.</p>	88	<p>1 staff to continue to provide those resources and 2 support tools to local election officials. 3 Q. Are you familiar with the county residence 4 requirement for poll workers imposed by Section 7.30 5 of the Wisconsin statutes? 6 A. Yes. 7 Q. And does that statute, in your 8 understanding, provide that poll workers must be 9 from the county in which they're being deployed as a 10 poll worker? 11 A. For the majority of roles, that's true. 12 There are some exceptions in some roles where that's 13 not the case. 14 Q. So in light of that statute, is it safe to 15 say that it is not currently possible for the 16 Commission to create a statewide pool of potential 17 poll workers to be deployed as needed across the 18 state? 19 A. We could -- we have, for example, a widget 20 on our websites where someone can indicate their 21 desire to be a poll worker, and then we can produce 22 that information to the local election officials 23 based on their addressing information and make sure 24 they're sent to the right place. But no, we 25 couldn't have a universal, sort of, pool of people.</p>

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Conducted on July 16, 2020

23 (89 to 92)

89	91
<p>1 We could for certain roles like a greeter or people 2 to have with sanitation, social distancing, some of 3 the nondecision-making election inspector roles. 4 Q. But not for the election inspector roles? 5 A. Correct, not for most election inspector 6 roles. 7 Q. From the Commission's perspective, would it 8 be easier to ensure adequate staffing at election 9 sites in November across the state if the court in 10 this litigation enjoined the county residence 11 requirement? 12 MR. GAHNZ: Object to the form. 13 A. That is not a question that the Commission 14 has considered. I don't know. That would be 15 speculation. 16 Q. If the statute was not being enforced in 17 November, is there any reason why the Commission 18 couldn't help to launch a statewide poll worker 19 recruitment program in advance of the November 20 election? 21 A. Again, it's not something that's been 22 brought before the Commission or considered, so I'd 23 be speculating. It's always a matter of the 24 Commission and staff needing to weigh all of the 25 priorities and resources. We'd certainly consider</p>	<p>1 So as of today, has the Commission begun 2 planning for a circumstance in which a significant 3 number of voters this November believe that they 4 cannot comply with the witness requirement without 5 putting themselves in danger? 6 A. I believe we've already had that discussion, 7 and that will be any information will be presented 8 to the Commission, and we'll consider it as part of 9 any directives to staff as we plan for the fall. 10 Q. Has it begun planning for that specific 11 circumstance? 12 A. Could you clarify the specific circumstance? 13 MR. SCHWARTZTOL: Can I ask the court 14 reporter to read back my last question, please? 15 (Record read as requested.) 16 A. Again, planning for any of the witness 17 requirements based on, you know, current public 18 health information from voters is something that the 19 Commission will have to continue to consider as we 20 head into November. 21 Q. It doesn't currently have any specific plans 22 in place to deal with that problem; is that correct? 23 A. The guidance that was issued as part of the 24 April election, the May Congressional District 25 election, and now as we head into the August</p>
90	92
<p>1 that if that was directed of us. 2 MR. GAHNZ: We've been going for a couple 3 hours. Can we take a short break? 4 MR. SCHWARTZTOL: You know, Dixon, normally 5 I am all for short breaks as we go. As we discussed 6 the other day, I know we are under very tight time 7 limits because of the WEC defendants strict timing 8 limitations. 9 MR. GAHNZ: I just need to use the restroom. 10 I'm not trying to be difficult. Just cut to the 11 chase. 12 MR. SCHWARTZTOL: Sure, let's go off the 13 record for a couple of minutes. 14 MR. GAHNZ: Thank you. 15 VIDEO TECH: Off the record. 16 (A short break was had.) 17 VIDEO TECH: Back on the record. 18 BY MR. SCHWARTZTOL: 19 Q. Ms. Wolfe, during that short break, did you 20 have conversation with anyone about any of your 21 testimony so far today? 22 A. I did not. I used the restroom. 23 Q. I want to just go back briefly to what we 24 were talking about earlier about the application -- 25 the witness signature requirement.</p>	<p>1 election. 2 Q. Is the Commission currently doing anything 3 to ensure that voters with a print disability are 4 able to vote privately and independently at home and 5 have an accessible means of receiving marketing and 6 submitting absentee ballots privately and 7 independently? 8 A. Local election officials, being the issuing 9 entity of ballots, are ultimately the ones that are 10 working with the voters to provide, if they decide, 11 you know, what a voter needs. So that's not a 12 responsibility necessarily to work with individual 13 voters at the state level. 14 Q. Has the Commission done anything to support 15 local election officials with respect to those 16 voters in particular? 17 A. Such as? 18 Q. Ms. Wolfe, you have to tell me if the 19 Commission has taken any action to support local 20 election officials working with those voters. 21 A. We have a long-standing accessibility 22 advisory committee that has members of the 23 accessibility committee, local election officials, 24 where we coordinate with questions and issues such 25 as that on a regular basis. We also have an</p>

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24 (93 to 96)

93	95
<p>1 accessibility audit program where we work with local 2 election officials to support their efforts. So 3 certainly part of a larger initiative to provide 4 information to local election officials. 5 Q. If a voter returns an absentee ballot that 6 has a potential defect -- say it's missing the 7 witness signature -- what happens? 8 MR. GAHNZ: Object to form. 9 A. That would be the -- the absentee canvassers 10 would be reviewing it for compliance with the 11 statute requirements and ultimately making a 12 decision about if it can be accepted or denied. 13 Q. Before that decision is made, does the voter 14 receive notice that their ballot may not be counted? 15 A. In some circumstances. It's not an explicit 16 requirement of the law, but many clerks do reach out 17 to their voters to alert them, if there's time, of a 18 deficiency. 19 Q. Is that left entirely to the discretion of 20 each absentee ballot canvasser? 21 A. The alerting the voter of a deficiency? 22 Q. Correct. 23 A. So no. That would be more or less the clerk 24 because usually that's going to be something that 25 happens before election day. So if a clerk gets</p>	<p>1 places on our website where there's a process for 2 that. 3 Q. There's no legal requirement that clerks 4 provide that notice to a voter; is that correct? 5 A. That's correct. 6 Q. And in the situation where a clerk exercises 7 his or her discretion to provide notice to a voter, 8 what kind of opportunity does the voter have to 9 explain or, if needed, cure the deficiency? 10 A. Well, it all depends on timing and what's 11 allowable under the law. So, you know, some 12 jurisdictions, I've heard if there's enough time, 13 they may send back the ballot of the voter and give 14 them an opportunity to have their original witness 15 sign it. If there's enough time, they might be able 16 to cancel their ballot and be reissued a new one so 17 that they can revote it in the presence of a 18 witness. There are also guidance that we provide 19 where a voter could do something like bring their 20 original witness with them to the clerk's office or 21 to the polls on election day to sign the ballot. 22 But, again, it has to be that person that originally 23 witnessed the voter voting their ballot that would 24 have to sign it. 25 Q. So each of those things that you just</p>
94	96
<p>1 back a ballot that's missing a witness requirement, 2 the clerk is likely going to be the one that is 3 contacting the voter so that they have enough time 4 to try to remedy it. But no, it's not the 5 responsibility of the ballot canvassers. 6 Q. Got it. So is it purely left to the 7 discretion of the clerk to decide whether to provide 8 notice to a voter that his or her absentee ballot 9 may be rejected? 10 A. Yes. 11 Q. Has the Commission ever provided any 12 guidance on the circumstances in which that kind of 13 notice should be given? 14 A. Yes. I'm not -- I don't know if I can point 15 to a specific document, but that's part of manuals 16 and documentation that we discuss that. 17 Q. Generally, what are the circumstances under 18 which a clerk should exercise discretion to provide 19 that notice to a voter? 20 A. If there were a deficiency on an 21 application, so if it were missing a witness 22 signature, if it was missing a voter signature. 23 There's also guidance about things if they're able 24 to find the address of the witness and to be able to 25 fill that in. So there's guidance in multiple</p>	<p>1 described, sending the witness -- excuse me -- 2 sending the ballot back to be cured, inviting the 3 voter to come in with the witness, canceling the 4 original ballot, are each of those measures within 5 the discretion of the clerk as to whether they'll 6 use one or the other of those measures? 7 A. I would say yes and also within the 8 discretion of the voter. I know that there's clerks 9 that will talk with the voter about what option they 10 would like to utilize, but the statute doesn't 11 prescribe that they have to use one method or a 12 method at all. 13 Q. And the clerk's discretion would include, 14 like you just said, not using any of the methods to 15 cure the defect of the ballot; is that correct? 16 A. That's correct. 17 Q. In which case that ballot would not be 18 counted? 19 A. Unless the voter, yes, initiated that, yes. 20 Q. The Commission is responsible for 21 maintaining the WisVote and MyVote systems; correct? 22 A. Yes. 23 Q. And a voter who seeks to request an absentee 24 ballot for the first time via the MyVote system has 25 to upload a copy of their photo ID; is that correct?</p>

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25 (97 to 100)

97	<p>1 A. Yes. Anyone requesting an absentee ballot 2 be sent to them for the first time or upon a new 3 registration has to provide their photo ID. 4 Q. Okay. And for that reason, a request from a 5 first-time absentee ballot requester or someone who 6 has changed their registration requires a little 7 more bandwidth from the system than a request from 8 someone who does not need to upload their photo ID? 9 A. Bandwidth from the system, yes. 10 Q. And that adds up over time if there are a 11 lot of voters in that situation; correct? 12 A. Photo IDs are picture files, and those are 13 very large, yes. 14 Q. So on any given election, if you have more 15 first-time absentee ballot requesters, that will 16 require more bandwidth from the system than if you 17 have fewer absentee ballot requesters; correct? 18 A. Yes, that's correct. 19 Q. As -- 20 A. May I just clarify? 21 Q. Yes. 22 A. Assuming that, of course, they're not 23 indefinitely confined. There are some exceptions to 24 the photo ID requirements, even for a first-time 25 applicant.</p>	99	<p>1 VIDEO TECH: Okay. One second. Exhibit 2 No. 9. 3 (Exhibit 9 was marked for identification 4 and is attached to the transcript.) 5 MR. SCHWARTZTOL: Can you scroll down just a 6 little bit on that first page? 7 BY MR. SCHWARTZTOL: 8 Q. Ms. Wolfe, I want to draw your attention to 9 the -- well, first let me say this is an e-mail sent 10 by Ms. Wolfe to several recipients on March 23rd. 11 Ms. Wolfe, are you familiar with this 12 e-mail? 13 A. Yes, I believe it's an e-mail I sent to the 14 Commission. I'm not familiar with it, no. 15 Q. Okay. Let me ask you to take a moment to 16 read to yourself that last paragraph on this page. 17 A. Sure. Okay. 18 Q. Okay. And so, you know, this paragraph 19 is -- it begins with the sentence, In terms of 20 capacity, the current volume on both MyVote and 21 WisVote are already beyond the capabilities of what 22 our systems were designed to do. 23 It explains that in some detail and 24 concludes the final sentence in that paragraph, As I 25 previously noted, we are doing absolutely everything</p>
98	<p>1 Q. Okay. And in the lead-up to this election 2 this April, there was an extraordinary demand on the 3 capacity needs of the MyVote system because of the 4 number of first-time absentee ballot requesters; is 5 that correct? 6 A. Extraordinary demand certainly. I don't 7 know that it's on MyVote itself. MyVote is an 8 interface. But probably on the servers and on the 9 overall memory capacity of our systems, yes. 10 Q. And did you find in the lead-up to the April 11 election that the volume of traffic on MyVote and 12 WisVote were stretching those systems beyond what 13 they were designed to do? 14 A. When you design a system, you use analytics 15 from the past to make sure that you're allocating 16 memory and resources to the appropriate place. It's 17 not useful to add, you know, five servers when you 18 only need two. That can actually cause problems. 19 So yes, the systems were used in a different 20 way than they ever had in the past, so we had to 21 make some adjustments. 22 MR. SCHWARTZTOL: I'd like to pull up what 23 was uploaded as Exhibit 9, although I think it may 24 have a different number as an exhibit to this 25 deposition.</p>	100	<p>1 humanly possible to keep adapting our systems to 2 handle a process and volume they were never designed 3 for. 4 Does that paragraph, Ms. Wolfe, accurately 5 describe the Commission's experience with MyVote and 6 WisVote in the lead-up to the April election? 7 A. Yes, but I think, you know, obviously, we 8 made changes so that it did continue to work. My 9 heart is racing even just reading that because it 10 was such a -- this represents probably weeks of 11 people literally not sleeping so that we could keep 12 everything running. So yes, it was certainly, you 13 know, our systems being used beyond what they were 14 ever designed to do or in a different way than we 15 could have ever imagined. That's why we were 16 working around the clock and doing everything 17 humanly possible to adapt our systems. 18 MR. SCHWARTZTOL: We can take the exhibit 19 down off the screen. 20 Q. Ms. Wolfe, do you anticipate that the number 21 of first-time absentee ballot requesters in November 22 will be larger than in previous November elections? 23 A. If April proves to be -- April and May prove 24 to be indicators of voter behavior, then yes. We 25 don't know what the voter behavior is going to be in</p>

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26 (101 to 104)

101	<p>1 November, but we certainly are adjusting and 2 planning our systems to accommodate at least that 3 type of volume. 4 Q. Does the Commission have an operating 5 assumption about what the volume of first-time 6 absentee ballot requesters is going to look at in 7 November? 8 A. Again, I certainly wish I knew. So we have 9 to go through everything planning for, sort of, the 10 largest number we can conceptualize or think of. So 11 I don't know, but we are planning for at least the 12 type of behavior that we saw in April percentagewise 13 and also understanding it could be more, it could be 14 less, and that we're going to have to be able to 15 scale and -- the servers again to make sure 16 everything operates whatever is thrown our way. 17 Q. Is the Commission doing anything that's 18 specifically designed to increase the bandwidth and 19 server capacity on the MyVote system? 20 A. Yes. 21 Q. What is it doing in that regard -- along 22 those lines? 23 A. Sure. So as is actually discussed in that 24 e-mail we just looked at, we've been doing load 25 testing. You know, also, of course, looking at just</p>	103	<p>1 so the actual developer is our IT contractor, so 2 yes, commission staff. 3 Q. Has the Commission added a number of IT 4 staff in the lead-up to the November election? 5 A. We have recently included or beefed up our 6 team in the last year, so yes. But we also are very 7 limited in terms of budget, having money to be able 8 to hire people and things like position authority 9 through the state system, so it's not something you 10 can just do. 11 Q. Since April 7th, has the Commission added 12 any new IT staff? 13 A. No, we have not. 14 Q. Do you know if the MyVote website is screen 15 reader accessible? 16 A. I do. Yes. 17 Q. And I'm sorry. Is that yes, you know or 18 yes, it is? 19 A. Yes, I know, and yes, it is. 20 Q. Was that true in April? 21 A. Yes. 22 MR. SCHWARTZTOL: Can you please pull up 23 what we had saved as Exhibit 11? 24 (Exhibit 11 was marked for identification 25 and is attached to the transcript.)</p>
102	<p>1 server structures and making sure that you have 2 everything set up for a larger volume. 3 Another piece of, sort of, that puzzle is 4 that all of those IDs, they don't just come to us. 5 They have to go to the local clerks for review. So 6 we're also building in what we call a pending entity 7 in the WisVote system so clerks can actually go into 8 our system to review those photo IDs rather than 9 having to worry about their e-mail systems being 10 overrun with these very large files. So it's a 11 multifaceted approach. 12 Q. Is that work being done in-house by the 13 Commission's IT staff? Is there a vendor actually 14 doing that work? 15 A. Unlike most states, we have built all of our 16 own technology, so it's all being done in-house by 17 our staff, yes. And then the Division of 18 Enterprise Technology through DOA, they house the 19 server structures, so they're also working on that 20 side. 21 Q. Is the Commission -- let me withdraw that. 22 Is the staff that's responsible for the 23 changes you just described the Commission's IT 24 staff? 25 A. We have IT staff and we have IT contractors,</p>	104	<p>1 MR. SCHWARTZTOL: This is a March 29 2 memorandum from Ms. Wolfe to election officials 3 across the state regarding absentee witness 4 signature requirement guidance. 5 BY MR. SCHWARTZTOL: 6 Q. Ms. Wolfe, this may be the guidance that you 7 referred to earlier; is that correct? 8 A. Yes. There's also public -- I'm not sure -- 9 what we would consider internally as guidance that 10 we worked on with the public health official too, so 11 there's multiple documents. 12 Q. And I think you said earlier that the 13 Commission right now does not have any specific plan 14 to update this guidance; is that correct? 15 A. Along with all the, I guess what I'll refer 16 to as public health guidance, guidance that we have 17 to keep adjusting in light of public health 18 guidance. I'm sure that they will be considering 19 this amongst that package as we head into November. 20 Q. But there's no specific plan to revise this 21 guidance? 22 A. Yes, I'm sure there is specific plans to 23 revise all of the guidance as we head into November. 24 Like I said, we're working on it actively to make 25 sure that public health officials agree from</p>

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27 (105 to 108)

<p>105</p> <p>1 day-to-day with what's being presented and they 2 still think it's a good practice. So yes, it's a 3 constant work in progress. 4 Q. So what you've just described, is it fair to 5 say, is a general philosophy that the Commission 6 should issue new guidance as needed? 7 A. Yes, I would agree. I think that's maybe 8 even a directive of the Commission, when they asked 9 us to work with the public health officials, that it 10 has to be kept current. 11 Q. And while the possibility that this document 12 might be revised is consistent with that general 13 philosophy, is there currently -- let me ask that 14 differently. 15 While the possibility of revising this 16 guidance would be consistent with that general 17 philosophy, there is not currently a specific plan 18 with respect to this guidance in particular to 19 revise it; is that correct? 20 A. I don't know that we've had -- as we've had 21 discussions with the public health officials, I 22 mean, we give them -- we have all the documents that 23 have to be considered. And so I'm sure, yes, 24 there's plans to make at least some edits. No 25 matter how small, I'm sure there will be edits to</p>	<p>107</p> <p>1 understand the guidance that we had received from 2 public health officials about ways to safely get a 3 witness signature on an absentee ballot 4 certification. 5 Q. Has the Commission done anything to assess 6 how many voters actually became aware of this 7 guidance? 8 A. No. 9 Q. Has the Commission done anything to assess 10 whether voters found this guidance easy to follow? 11 A. We have a strong commitment to usability, 12 but no, I don't believe there was any time to do 13 that with this particular document we're looking at, 14 no. 15 Q. Are you concerned that some voters may have 16 found an 11-step process to be cumbersome or 17 confusing? 18 A. It's always a challenge to convey any 19 election laws, especially when you're trying to 20 combine public health information and some very 21 complicated election laws. So we do our best to try 22 to present information within the parameters of the 23 law and within health expertise. 24 Q. Understood. With all of those 25 qualifications, is it fair to say then that you</p>
<p>106</p> <p>1 every document. I can't imagine there's a document 2 we would leave exactly the same. The Commission 3 hasn't discussed that particular document and its 4 plans for that particular document. It's all the 5 documents as far as the -- 6 Q. So you're saying that your best guess is 7 that this may be revised, but you don't know of any 8 specific plans to do it? 9 A. That's fair. 10 Q. Got it. 11 MR. SCHWARTZTOL: So let's bring the 12 document back up and let's bring page 2 on to the 13 screen, please. 14 VIDEO TECH: Yes, sir. Page number 2? 15 MR. SCHWARTZTOL: And maybe if you can 16 scroll down so that -- where it says "Process 17 Developed With Public Health Official Guidance" is 18 at the top of the page and hopefully we can get the 19 rest of the page under that. 20 BY MR. SCHWARTZTOL: 21 Q. Ms. Wolfe, are you familiar with this 22 11-step guidance? 23 A. Yes. 24 Q. What is the purpose of this guidance? 25 A. In this format it was to help clerks</p>	<p>108</p> <p>1 agree that some voters may have found it to be 2 cumbersome or difficult to follow? 3 A. I don't know that I have that -- I or the 4 Commission has taken a stance in having that concern 5 about this particular document. I would represent 6 it as an ongoing challenge that we're always trying 7 to overcome. 8 Q. Would you agree that it would be easier for 9 voters with disabilities or voters who are 10 immunocompromised or otherwise at higher risk from 11 COVID-19 to vote absentee if they did not have to 12 satisfy the witness requirement? 13 A. That is not something I have any particular 14 data about nor has the Commission taken a position 15 on. You know, it would be speculating without any 16 data for me to answer that. 17 Q. Okay. 18 MR. SCHWARTZTOL: Okay. We can take this 19 exhibit down. 20 Q. Do you know how many ballots were received 21 between April 7th and April 13th that lacked a 22 postmark? 23 MR. GAHNZ: That lacked what? 24 MR. SCHWARTZTOL: A postmark. 25 MR. GAHNZ: Okay.</p>

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28 (109 to 112)

<p style="text-align: right;">109</p> <p>1 BY THE WITNESS: 2 A. I believe that's part of the report in the 3 data sets that we provided, but no, I do not know 4 off the top of my head. 5 Q. And you testified on July 3rd, it was left 6 to local election officials to determine whether to 7 count those ballots. 8 Do you recall that earlier testimony? 9 A. Well, the canvassers need to ultimately 10 decide whether or not a postmark met the 11 requirements, the criteria that was set forth by the 12 Supreme Court. So that was -- yes, they're the ones 13 that are making that decision. 14 Q. Do you know, of the ballots received during 15 that time period that lacked a postmark, what 16 percentage were ultimately counted? 17 A. I do not know. I do not know. 18 Q. Has the Commission taken any action to try 19 to learn the answer to that question? 20 A. If -- if it is data that we have, which I'm 21 not sure that the local election officials report to 22 us that data of a granular level, then it is 23 available on our website or as some part of our 24 discussion. So any of the data we have about 25 rejection rates has been presented.</p>	<p style="text-align: right;">111</p> <p>1 not slow down -- scroll down and show me if there's 2 a recommended motion at the bottom? I just want to 3 make sure I'm thinking about the right one. 4 Q. There is and -- 5 A. Okay. Thank you. And yes, I am familiar. 6 Q. If you need a moment to refresh your 7 recollection, the recommended motion is on the 8 bottom of page 2 and it refers then to the attached 9 guidance. 10 A. Thank you. Yes, I remember this. 11 Q. Okay. Did the Commission staff propose to 12 the Commission issuing a guidance to municipalities 13 on how to deal with ballots arriving between 14 April 7th and April 13th that lacked a postmark? 15 A. Yes, this memo was prepared for that purpose 16 for the Commission's consideration. 17 MR. SCHWARTZTOL: And let me ask to scroll 18 to page 6 of the guidance, which is not page 6 of 19 the document. Great. Thank you. 20 VIDEO TECH: Uh-huh. 21 MR. SCHWARTZTOL: Would you mind scrolling 22 down just a little bit farther? 23 BY MR. SCHWARTZTOL: 24 Q. So the first -- I'll just read to you the 25 first sentence of that first paragraph. It says,</p>
<p style="text-align: right;">110</p> <p>1 Q. So sitting here today, though, you don't 2 know whether the Commission has taken any action to 3 determine the share of those ballots that were 4 counted or rejected; correct? 5 A. Well, you just looked at the absentee report 6 which discusses rejection rates, so yes, certainly 7 the Commission has looked at that. And we are 8 looking at the data provided to us by 1850 9 municipalities, and so whatever they presented to us 10 we have available as data to be able to include in a 11 report such as that. 12 MR. SCHWARTZTOL: Let's pull up Exhibit 12, 13 please. 14 VIDEO TECH: Yes, sir. 15 (Exhibit 12 was marked for identification 16 and is attached to the transcript.) 17 VIDEO TECH: Exhibit No. 12. 18 MR. SCHWARTZTOL: This is an April 10th 19 memorandum from Ms. Wolfe to the members of the 20 election commission regarding absentee ballot mail 21 postmark issues. 22 BY MR. SCHWARTZTOL: 23 Q. Ms. Wolfe, are you familiar with this 24 document? 25 A. Could you slow down? Does this include --</p>	<p style="text-align: right;">112</p> <p>1 Having considered the legal issues AND USPS 2 procedures described above, the Wisconsin Elections 3 Commission directs municipal canvass boards to count 4 a ballot, if otherwise valid, if the board 5 determines, by a preponderance of the evidence, that 6 the ballot was in the possession of a USPS facility 7 on or about April 7, 2020, regardless of whether the 8 ballot return envelope contains a postmark with a 9 date marked on or before April 7th. 10 Ms. Wolfe, did that guidance go into effect? 11 A. No, the Commission did not adopt this 12 guidance. 13 Q. Do you remember what the Commission's vote 14 was on this motion? 15 A. I don't. You'd have to look at the public 16 record, but it didn't pass. So it either was a 3-3 17 or -- there wasn't a majority vote. 18 Q. Understood. From your testimony a few 19 minutes earlier, I assume you do not know how many 20 votes that were otherwise discarded would have been 21 counted if that guidance had gone in effect; is that 22 correct? 23 A. That's correct. 24 Q. Do you think it's safe to assume it would 25 have been in the thousands?</p>

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29 (113 to 116)

<p>1 MR. GAHNZ: Object to the form. 2 A. I have absolutely no idea how to know that 3 information. 4 Q. Okay. If a court had ordered that measure, 5 the measure that's described here on page 6, the 6 Commission would have directed local officials 7 across the state to implement it; is that correct? 8 A. Yes. Based on our understanding of what the 9 court ruling allowed and our analysis of that and if 10 the Commission then approved it, then that would be 11 the guidance that was given to local election 12 officials, yes. 13 MR. SCHWARTZTOL: So I want to pull up on to 14 the screen Exhibit 17, please. 15 VIDEO TECH: Yes, sir, one second. Give me 16 one second to open it. Okay. 17 MR. SCHWARTZTOL: Thank you. 18 (Exhibit 17, previously marked, is 19 attached to the transcript.) 20 BY MR. SCHWARTZTOL: 21 Q. This is a report from the Office of the 22 Inspector General of the U.S. Postal Service dated 23 July 7, 2020, regarding the timeliness of ballot 24 mail in the Milwaukee processing and distribution 25 center service area.</p>	113	<p>1 some provisions in the law that on a Friday before 2 the election, indefinitely confined, calendar-year 3 requests, and some military voters, if they're not 4 away from home and it's not a federal election, 5 might be eligible. But then for military voters, 6 it's up until 5 o'clock on election day. 7 Q. But for most voters it's the Thursday before 8 election day? 9 A. That's correct. 10 MR. SCHWARTZTOL: Can we please scroll to 11 the next page? 12 Q. I want to draw your attention to the first 13 paragraph on that page beginning in the second 14 sentence which begins, In our opinion, ballots 15 requested less than seven days before an election 16 are at high risk of not being delivered, completed 17 by voters, and returned to the election offices on 18 time. 19 Can I just ask you to take a moment to read 20 from that sentence through the rest of the 21 paragraph, Ms. Wolfe? 22 A. Sure. Okay. 23 Q. Do you have any reason to doubt the Postal 24 Service's assessment that ballots requested less 25 than seven days before an election are at high risk</p>	115
<p>1 Ms. Wolfe, are you familiar with this 2 report? 3 A. Very broadly, yes, I'm familiar with it. 4 Q. Okay. Can we please scroll to page 6? 5 VIDEO TECH: Sure. You want page 6 from the 6 PDF or from the actual -- 7 MR. SCHWARTZTOL: Yeah, thank you for 8 clarifying. The page numbering on the document 9 itself. 10 VIDEO TECH: Number 6. 11 MR. SCHWARTZTOL: That's correct. Thank 12 you. 13 VIDEO TECH: You're welcome. 14 BY MR. SCHWARTZTOL: 15 Q. So if I could ask you to take a look at 16 table 1, I know you don't need a report by the U.S. 17 Postal Service to convey this information to you, 18 but is it safe to assume that they are correct that 19 Wisconsin -- actually, I'm sorry. Let me withdraw 20 that question. 21 Ms. Wolfe, what is the deadline for voters 22 to request an absentee ballot? How many days before 23 an election? 24 A. For most regular voters, it would be the 25 Thursday prior to the election, but then there are</p>	114	<p>1 of not being delivered? 2 A. Our guidance has been pretty consistent over 3 the years that it may take up to a week for ballots 4 to be delivered; so my understanding of what they've 5 issued in the past and in this report, that is true. 6 Q. So you have no reason to doubt that 7 high-risk characterization? 8 A. That -- I don't know what they're using to 9 define that. You know, I believe the information 10 about it taking up to a week to be true because 11 that's what we've operated under for as long as I 12 can remember. 13 Q. So that means that a voter who is complying 14 with Wisconsin law by requesting a ballot -- an 15 absentee ballot on the Thursday or even the 16 Wednesday prior to an election stands a high risk of 17 having their vote not delivered by election day; is 18 that correct? 19 MR. GAHNZ: Object to the form. 20 A. That is what the report states. As we saw, 21 there are so many nuances to how different postal 22 branches handle mail, so I think that that could 23 vary from postal branch to postal branch. But I'm 24 not a postal expert, so I will have to rely on what 25 the report says.</p>	116

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30 (117 to 120)

<p>1 Q. And under Wisconsin law, those ballots that 2 are not returned by 8:00 p.m. on election day are 3 not counted; correct? 4 A. That's correct. Wisconsin State Statutes 5 say that all ballots must be received by 8:00 p.m. 6 on election day. There are no late-return 7 exceptions under the current law. 8 Q. If the court in this case, again, extended 9 the ballot receipt deadline, for example, by six 10 days or a week, that risk would be significantly 11 decreased; correct? 12 MR. GAHNZ: Object to the form. 13 A. That would be speculation. You know, the 14 Commission would have to consider whatever the court 15 ruling was and implement it. 16 Q. And the Commission has previously determined 17 that nearly 80,000 votes received during that 18 extended period in April were counted, which under a 19 strict application of the statute are ballots that 20 would not otherwise have been counted; correct? 21 A. The first part is true. The second part we 22 don't know. That's an unknown because you don't 23 know what voter behavior could have been if they 24 knew they had to get their ballots back by election 25 day, so I don't have no idea what that number would</p>	117	<p>1 wish I did. We don't know what exactly voter 2 behavior is going to be in November, how many people 3 are going to vote by mail absentee. We don't know 4 that. 5 Q. Ms. Wolfe, how many public meetings of the 6 WEC are currently set to take place between now and 7 the November election? 8 A. Well, the next regularly scheduled one is, I 9 believe, for September 1st. I think I have that 10 right. But if you look at what our schedules look 11 like the rest of the year, we've had more than 20 12 and we're supposed to have two. 13 Q. So you anticipated my next question. 14 The Commission has the ability to call ad 15 hoc meetings as needed; correct? 16 A. Yes. 17 Q. Does it currently have any plans to call 18 more than one meeting between now and the November 19 election? 20 A. Not solidified plans, but I would all but 21 guarantee that we will absolutely be having more 22 meetings between now and September 1st. 23 Q. So when will there be a determination about 24 how many meetings are required and when they'll take 25 place?</p>	119
<p>1 be. 2 Q. But if all those votes had, in fact, been 3 received during that same period, under a strict 4 application under Wisconsin law, they would not have 5 been counted; correct? 6 A. Under current law, anything received after 7 8:00 p.m. on election day cannot be counted. 8 Q. And based on data from previous presidential 9 election years, is it fair to assume that voter 10 participation in November is going to be 11 significantly higher than it was in April? 12 A. Based on historical turnout, yes. 13 Q. And that that might be in the neighborhood, 14 again, based on historical turnout, of three times 15 as many voters; is that the Commission's 16 understanding? 17 A. I believe that's a fairly accurate estimate, 18 yes. 19 Q. So whether the statutory deadline strictly 20 applies or is extended is a question that could, at 21 least potentially, impact hundreds of thousands of 22 votes and whether or not they're counted; is that 23 correct? 24 A. We don't -- I don't know that I can quantify 25 that without speculating. Again, we don't know -- I</p>	118	<p>1 A. Another thing I wish I had a crystal ball 2 for, but we have to notice it with 24-hour advance 3 notice. Sometimes we don't know before the day 4 before if we need to have a meeting. Sometimes 5 we're able to anticipate when decisions have to be 6 made and we can plan ahead. So I don't know. 7 Q. Would you agree that the challenges around 8 election administration going into the November 9 election are extraordinary? 10 A. When aren't they? That's kind of the job. 11 Yes, they're always extraordinary. Our 12 circumstances are always extraordinary. 13 Q. Do you think the Commission will be able to 14 adequately manage those challenges without 15 additional meetings beyond the September 1st one 16 that's currently on the calendar? 17 A. No, I believe we will need to have more 18 meetings than that to discuss things with the 19 Commission. 20 Q. But you don't know when there will be a 21 determination about whether and when those meetings 22 will take place? 23 A. No, because, again, you don't know until -- 24 until the thing arises. 25 Q. Ms. Wolfe, you're not trained in</p>	120

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31 (121 to 124)

<p>121</p> <p>1 epidemiology; correct? 2 A. Correct. 3 Q. Is anyone else on the WEC staff? 4 A. No. 5 Q. Earlier this week, did you take part in a 6 webinar at the University of Minnesota entitled 7 "Voting in the Time of COVID-19, Wisconsin's 8 Experience"? 9 A. I did. 10 Q. And do you recall during that webinar 11 offering remarks on reports that some voters and 12 poll workers became sick with COVID in the wake of 13 the April 7th election? 14 A. Yes. 15 Q. And do you recall offering commentary along 16 the lines that, quote, The reporting that was done 17 was quite problematic because it was based on 18 self-reporting, end quote, and then going on to 19 refer to, quote, skits and things when people are 20 asked and are self-reporting and don't always tell 21 the truth, end quote? 22 A. To put it into context, this was during a 23 question and answer, and it was me appearing in my 24 capacity, not representing any position of the 25 Commission.</p>	<p>123</p> <p>1 left to those that are experts. I would just hope 2 that they would use actual election participation 3 data to make those conclusions. 4 Q. So the Commission itself is not doing 5 anything to evaluate the voracity of that study? 6 A. How? We wouldn't have the resources to do 7 that. We wouldn't have the expertise to do that. 8 Q. Understood. And, similarly, it's not doing 9 anything to evaluate the voracity of any statistical 10 or epidemiological studies on similar topics; 11 correct? 12 A. Correct, but there's often media reports 13 that are, you know, problematic. 14 Q. Ms. Wolfe, is it true that as of July 11, 15 2020, the WEC received via e-mail and its website 16 thousands of complaints by voters regarding the 17 administration of the April 2020 election? 18 A. Yes, but -- yes. Yes. 19 Q. And is it true that voters described their 20 concerns to the WEC that polling places would have 21 an inadequate number of poll workers, polling 22 locations would not allow for social distancing, and 23 that there would be a lack of PPE at polling places? 24 A. We have not concluded our searches on that. 25 Upon preliminary discussions of the staff, we have</p>
<p>122</p> <p>1 Q. Do you recall offering those comments? 2 A. Yes. 3 Q. And you're not in the business of evaluating 4 the methodologies of epidemiological or statistical 5 studies; is that correct? 6 A. That's correct. 7 Q. Are you familiar with a working paper 8 published by the National Bureau of Economic 9 Research entitled "The Relationship Between 10 in-Person Voting and COVID-19, Evidence From the 11 Wisconsin Primary"? 12 A. I'm sure at some point I've reviewed many 13 documents, but I don't have that one particularly, 14 you know -- I would have to be familiarized with it. 15 Q. Are you familiar with that paper's 16 conclusion that there was a statically and 17 economically significant association between 18 in-person voting and the spread of COVID-19 two to 19 three weeks after the election? 20 A. No, I'm not familiar with that conclusion. 21 Q. In preparing for the November election, is 22 the Commission or the Commission staff doing 23 anything to evaluate the voracity of that study? 24 A. As you indicated, you know, we're not public 25 health experts, so that analysis will have to be</p>	<p>124</p> <p>1 no reason to believe there are thousands of e-mails 2 to that particular nature. I think there are 3 thousands of e-mails contacting us but not about 4 that particular topic. 5 Q. So you cannot confirm it's true that voters 6 described -- maybe among other things, but described 7 concerns that polling places would have an 8 inadequate number of poll numbers, that polling 9 locations would not allow for social distancing, and 10 that there would be a lack of PPE at polling places? 11 A. Oh, I'm sorry. Amongst the concerns we 12 heard from voters is that they were concerned that 13 that would be the case. I think that's different 14 than a complaint saying you're experiencing the 15 thing. But yes, there were many, sort of, template 16 e-mails or people that e-mailed the agency with 17 concerns about how the election would be run. 18 Q. Is it true that voters complained to the WEC 19 about lengthy waits and longer wait times associated 20 with in-person voting as a result of polling place 21 closures and lack of curbside voting locations? 22 A. I'm sure amongst the complaints that came to 23 us, yes, especially in some jurisdictions. 24 Q. Is it true that voters complained to the WEC 25 about limited in-person absentee voting</p>

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32 (125 to 128)

<p style="text-align: right;">125</p> <p>1 opportunities, including as a result of insufficient 2 hours of operation and days open and a lack of drop 3 box availability? 4 A. I'm sure amongst the many contacts we had 5 were that. And when you're describing complaints, 6 I'm not talking about the formal statute complaint 7 process. These are contacts with our office, people 8 relating information to us. 9 Q. Understood. So with that clarification, you 10 did receive complaints along the lines I've just 11 described; correct? 12 A. Yes. 13 Q. And is it true that voters reported being 14 confused about when and how to vote both in-person 15 and absentee? 16 A. Yes. 17 Q. Is it true that voters complained generally 18 to the WEC that the election should not have been 19 held on April 7th? 20 A. Yes. 21 Q. I want to go back to one of your answers a 22 moment ago when you described complaints and 23 template complaints. 24 A. Uh-huh. 25 Q. Does the Commission accord different weight</p>	<p style="text-align: right;">127</p> <p>1 something, we need to help them in that moment. If 2 somebody is generally expressing the concern of a 3 larger organization that something might happen, 4 that's -- you know, that's not something we need to 5 help them with in the moment. 6 MR. SCHWARTZTOL: I think we may soon be 7 ready to pass the baton to the Edwards team. 8 Can I ask, Leyhbert, if I wanted a segment 9 of the attorneys -- the Swenson attorneys to just 10 for two minutes go into a break room, are you able 11 to enable that? 12 VIDEO TECH: Yeah, if you need to -- I can 13 do a breakout room, so you let me know who are going 14 to that room and I can put the number of people into 15 that room, yes. 16 MR. SCHWARTZTOL: Great, so I'll tell you 17 right now. So it will be me -- 18 VIDEO TECH: Give me one second. I've got 19 to do something here to make sure. 20 Okay. So it's going to be? 21 MR. SCHWARTZTOL: It will be me, Farbod 22 Faraji, Leah Godesky, Emerson Goldstein, Harry 23 Liberman, and Jonathan Manes. 24 I also should have said we can go off the 25 record for a moment.</p>
<p style="text-align: right;">126</p> <p>1 to complaints it receives based on whether or not it 2 determines them to be, as you've described, as 3 template complaints? 4 A. Well, there's sworn complaints that are 5 outlined by the statutes, and those have to go to 6 the full commission for consideration. Then there 7 are times when we get many, many e-mails from mostly 8 out-of-state individuals that are using a template. 9 So we let the Commission know about that, but 10 obviously we're not going to send them a thousand 11 e-mails that says the exact same thing. 12 But no, I don't think weighting them is the 13 appropriate way. There's just different processes 14 for handling volume and making sure they're aware of 15 the types of context that come through. 16 Q. The fact that a voter might express a 17 complaint through what appears to be a template 18 doesn't, in any way, contradict either the truth of 19 the complaint or how strongly the voter feels about 20 it; isn't that right? 21 A. I would also say that there's a -- you know, 22 there's complaints -- again, somebody experiencing 23 something versus someone saying, in general, I am 24 worried this might happen. I think that those 25 are -- obviously, if somebody is experiencing</p>	<p style="text-align: right;">128</p> <p>1 (A short break was had.) 2 MS. ROSENZWEIG: Thank you. We can go 3 ahead. 4 Ms. Wolfe, are you still on the line here? 5 THE WITNESS: Yes. 6 MS. ROSENZWEIG: Are you able to hear me? 7 THE WITNESS: Yes. 8 MS. ROSENZWEIG: My name is Stacey 9 Rosenzweig. I'm with Halling & Cayo, S.C. I'm one 10 of the attorneys for the Edwards plaintiffs, 11 23-cv-340. Thanks again for agreeing to give 12 testimony today. I will endeavor to keep this very 13 brief and hopefully nonduplicative. Again, I did 14 have some connectivity issues on and off, so if I do 15 ask something that's already been asked, I 16 apologize. 17 DIRECT EXAMINATION 18 BY MS. ROSENZWEIG: 19 Q. All right. You testified in your first 20 session on July 3rd that every registered voter in 21 Wisconsin, with some exceptions, was to be sent a 22 mailer containing an absentee ballot request form, 23 among other things. 24 Do you recall that testimony? 25 A. Yes. It wasn't every registered voter,</p>

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33 (129 to 132)

129	<p>1 though.</p> <p>2 Q. Yeah. What were the exceptions?</p> <p>3 A. Well, it's to voters without an absentee</p> <p>4 request on file, so voters that don't have an</p> <p>5 absentee voter request on file is who will receive</p> <p>6 the mailer.</p> <p>7 Q. Has that mailer been sent yet?</p> <p>8 A. No. The Commission directed it be sent on</p> <p>9 or about September 1st. We are starting to print</p> <p>10 them. Three million pieces of mail need to be</p> <p>11 printed over the course of a few months, and we have</p> <p>12 to find climate-controlled storage to make sure</p> <p>13 we're keeping them at the right temperature and</p> <p>14 humidity. But yes, that's underway, and we'll be</p> <p>15 sending them out on September 1st.</p> <p>16 Q. How many mailers do you anticipate sending?</p> <p>17 A. I believe it's about 2.6, 2.7 million.</p> <p>18 Q. And what was the approximate cost or will be</p> <p>19 the approximate cost?</p> <p>20 A. This would be available as part of the</p> <p>21 Commission's materials and their motion, if I</p> <p>22 recall, to the \$2.1 million they approved an</p> <p>23 expenditure up to.</p> <p>24 Q. What was the source of funding for this?</p> <p>25 A. That would be the CARES Act grant funding</p>	131
130	<p>1 with regard to the WEC's role, if any, in the</p> <p>2 absentee ballot transmission process.</p> <p>3 You indicated in your testimony just now</p> <p>4 that municipalities and not the Commission are</p> <p>5 responsible for sending an absentee ballot to a</p> <p>6 voter who requested one; is that correct?</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. Are there any exceptions to that?</p> <p>9 A. Through the MyVote Wisconsin site for</p> <p>10 military and overseas voters, we are able to issue</p> <p>11 it on their behalf, but they're still ultimately the</p> <p>12 decision makers and custodians of that record.</p> <p>13 Q. By "they," you mean the municipalities?</p> <p>14 A. Yes, yes.</p> <p>15 Q. Okay. Are you aware as you sit here how</p> <p>16 much it costs to send an absentee ballot to a voter</p> <p>17 in the United States?</p> <p>18 A. In some of our publicly-available</p> <p>19 documentation, I think we make some rough estimates,</p> <p>20 but you have to factor in the cost of postage both</p> <p>21 ways. It's my understanding it's an oversized,</p> <p>22 overweight envelope, so it's going to be more than</p> <p>23 \$0.55 each way. In some instances, the cost of the</p> <p>24 ballot itself, the cost of two envelopes, the</p> <p>25 outgoing envelope, the incoming envelope, then all</p>	132

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<p style="text-align: right;">133</p> <p>1 of the labels that need to go on it as well. So I 2 don't have an exact number, but those are all the 3 factors. We know that it's at least a \$1.10 because 4 that would be the minimum for postage both ways. 5 Q. \$1.10 plus the paper and printing and all 6 that? 7 A. Labels, yeah. 8 Q. And who pays the cost of sending an absentee 9 ballot to a voter? 10 A. In most instances, the responsibility is the 11 municipal clerk's. Some municipalities may have 12 different agreements with our counties. I know we 13 found there are some counties that might buy 14 envelopes. We bought a bunch of envelopes in April. 15 We always have to work together to make things 16 happen. But ultimately, at the end of the day, the 17 responsibility to pay for having enough ballots and 18 ballot materials is the municipalities. 19 Q. It's fair to say that April was not a 20 typical election for absentee balloting; I think 21 that's fairly clear; correct? 22 A. It is unlike any election that we've seen 23 previously, yes. 24 Q. All right. It's fair to assume that the 25 costs of absentee balloting in aggregate were more</p>	<p style="text-align: right;">135</p> <p>1 incremental cost for that third label is? 2 A. You know, I don't. We're probably talking, 3 you know, a percentage of a cent per label. 4 Q. That's fair, and -- all right. I'll move 5 on. 6 You discussed earlier in your testimony that 7 the WEC is tasked with enforcing and implementing 8 various election laws from different sources; is 9 that accurate? 10 A. Implementing, yes. As we've discussed, 11 enforcement is as defined in statutes, and it's not 12 really -- we don't have sanctions or anything that 13 we're able to impose. 14 Q. And the Americans With Disabilities Act is 15 one such source of law that the WEC is tasked with 16 implementing and, to a certain extent, enforcing? 17 A. Yes. Wisconsin State Statute 5.25 outlines 18 most of the areas that we are involved in. 19 Q. Okay. Is polling place safety under the 20 purview of the WEC? 21 A. I don't know that the statute specifically 22 discusses safety outside of access, you know, 23 requirements. I'm sorry. I don't know if the 24 statutes specifically talk about safety. 25 Q. All right. That's fair.</p>
<p style="text-align: right;">134</p> <p>1 expensive than they would be under a normal April 2 election; is that correct? 3 A. If you -- yes. If you factor in per-ballot 4 or per-postage cost times the number of ballots that 5 were sent, yes, it certainly would be a higher 6 amount. 7 Q. Okay. Do you have a sense whether the costs 8 were different per voter or per ballot than they 9 would be this April than they would have been for a 10 previous April election? 11 A. I don't have any reason to believe that the 12 per-voter cost was different than previous election, 13 no. 14 Q. Do you have any reason to believe that 15 per-voter cost for an absentee ballot will be 16 greater in November than they would be for a typical 17 November? 18 A. Nominally maybe because of the intelligent 19 mail barcodes. So some clerks have expressed to us 20 that they have to get a third label per ballot to 21 put the barcode on the return envelope. But other 22 than that and staff time, of course, to process and 23 send the ballots, I'm not aware of a per-ballot or 24 ballot-materials increase in cost. 25 Q. Do you have any sense as to what the</p>	<p style="text-align: right;">136</p> <p>1 Well, let's talk about accessibility under 2 Section 5.25. 5.25 sets forth that the statute 3 requires all polling places to be accessible to all 4 individuals with disabilities. 5 Is that your understanding of the statute? 6 A. Yes. 7 Q. Does the Commission have a role in 8 implementing that statute? 9 A. Yes, in terms of providing guidance. We 10 also do things like review plans for polling places. 11 So if a clerk is going to open a new polling place, 12 they have to fill out the accessibility survey that 13 we reviewed as part of that plan. We also do 14 accessibility audits when we're able and provide 15 information to them about our findings. And, you 16 know, of course, there's always the complaint 17 process that someone could utilize if they had an 18 experience where the polling place was not 19 accessible. 20 Q. You mentioned reviewing new polling places. 21 Is there a requirement that municipalities 22 submit these new polling places for review, or is 23 that just up to the clerk's discretion? 24 A. I believe it is a requirement that we have 25 that they -- I don't know how -- again, we don't</p>

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<p style="text-align: right;">137</p> <p>1 have an enforcement mechanism, but we do ask that 2 they submit their accessibility survey to us anytime 3 they institute a new polling place. 4 Q. Did your understanding of Section 5.25 5 require that early in-person voting places be 6 similarly accessible? 7 A. Well, 5.25 does talk about in-person 8 absentee, if I'm remembering correctly. I think 9 sub-four is specific to voting equipment or other 10 things that wouldn't be at an in-person absentee 11 site. But yes, I do think 5.25 discusses in-person 12 absentee opportunities. 13 Q. Has the WEC promulgated any particular 14 guidance for what accessibility features are 15 required at a polling place? 16 A. Yes. 17 Q. What sort of guidance has the WEC 18 promulgated? 19 A. So there's a lot of guidance, whether it be 20 in our manuals, best practices on our website, clerk 21 communications, also through the audit program. We 22 do webinars on a regular basis, and we discuss 23 things like, you know, needing to make sure that 24 polling places are accessible, how to interact with 25 voters. You know, those are all part of the</p>	<p style="text-align: right;">139</p> <p>1 A. Again, it's something that's ingrained in 2 all of our various trainings. But I would say 3 perhaps our guidance on curbside voting or 4 drive-through voting, some of those would have been 5 specific because curbside is a specific type of 6 voting available to voters with disabilities, so 7 yes. 8 Q. Do you anticipate or are you aware of the 9 WEC planning to promulgate additional guidance 10 concerning accessibility in advance of the November 11 election? 12 A. Oh, we're working with our accessibility 13 advisory committee on a very regular basis. We meet 14 with them to talk about any additional guidance or 15 documentation. We just worked with them on some 16 additional guidance for care facilities and how to 17 help residents of care facilities with their 18 absentee ballots. So yes, I'm sure that will be 19 part of the guidance that we continue to consider 20 and bring before the Commission. 21 Q. Are these meetings with the committee, are 22 these public meetings or informal meetings or 23 something else? 24 A. They are public, yes. We notice them. 25 Q. Do you know when the next one is?</p>
<p style="text-align: right;">138</p> <p>1 training that we provide as well. 2 Q. Was any of that guidance updated for the 3 April 7th election? 4 A. I'm not sure. Anything that was updated 5 would be publicly available. We have 2,000 clerks 6 so nothing ever gets done in secret. So if we did 7 update guidance, there were many, many, many 8 documents that we updated, it would be available on 9 our website. 10 Q. Are you aware of any guidance that the WEC 11 has promulgated regarding accessibility at the polls 12 for individuals who may be immunocompromised? 13 A. I believe it's been part of the Commission's 14 discussions when talking about things like the 15 definition of indefinitely confined, also when we 16 prescribed -- not prescribed, but when we gave 17 additional best practices for things like curbside 18 or drive-through voting, those were part of that 19 discussion. But we don't, you know, qualify or 20 classify different medical conditions. It's all, 21 you know, guidance that we put together for anybody 22 that would qualify. 23 Q. Are you aware of any guidance promulgated by 24 WEC that was specifically targeted to accessibility 25 in the midst of the COVID pandemic?</p>	<p style="text-align: right;">140</p> <p>1 A. It would be on our calendar. I don't know. 2 Q. Do you know if one has been scheduled? 3 A. Yes, I believe so. 4 Q. Now, WEC also has some rule-making authority 5 under Chapter 227 of the statutes; is that correct? 6 A. I believe so. 7 Q. Can you briefly summarize your understanding 8 of this authority? 9 A. I'm sorry. I can't. There's been so many 10 changes to rule-making authority and whatnot. It's 11 quite limited what we're able to do and only in 12 certain subject matters, so I don't know that I can 13 elaborate on that specific authority. 14 Q. All right. As we sit here today, are you 15 aware of any plans for WEC to engage the rule-making 16 process with regard to accessibility -- 17 A. That's not currently -- 18 Q. Go ahead. 19 A. That's not currently something that is 20 scheduled to go before the Commission. If there 21 were a request or if the Commission wanted to 22 discuss that, they would, but it's not currently 23 scheduled. 24 Q. What are the sources of requests for 25 something like that to go before the Commission?</p>

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<p style="text-align: right;">141</p> <p>1 A. Usually from commissioners themselves. If a 2 commissioner wants to discuss a topic or perhaps our 3 accessibility advisory committee brought something 4 to our attention that they want to go before the 5 Commission. We recently had a petition for 6 rule-making. I'm not sure what type of legs it had, 7 but that went before the Commission. So various 8 ways. Complaints. A complaint would trigger that 9 going before the full commission, and they would 10 obviously have to consider remedies available to 11 them. 12 Q. All right. You testified earlier both today 13 and last time regarding that June 26th report, which 14 today was marked as Exhibit 7. 15 Do you recall that? 16 We don't need it up on screen, though? 17 A. Could you remind me what was the title of 18 that report? 19 Q. It was the June 25th report submitted to the 20 court. I don't have the exhibit in front of me 21 either. 22 A. Oh, yes. Our status report, yes, I'm 23 familiar. 24 Q. Your status report. 25 So you testified that it sets forth what the</p>	<p style="text-align: right;">143</p> <p>1 there other stakeholders here? 2 A. The accessibility advisory committee is 3 representatives of -- that work with different 4 facets of the accessibility community. There's also 5 a voter advocacy group. That's the public. And 6 then I would say clerks are also part of those 7 conversations as well. We have a lot of clerk 8 workgroups. They're welcome to join those 9 conversations well. 10 Q. All right. Thank you. 11 You mentioned polling places earlier. 12 Who is responsible for selecting polling 13 places? 14 A. Municipalities. 15 Q. Do you know approximately how many polling 16 places there are in Wisconsin -- Strike that. 17 Let's go back to when elections were typical 18 and not the April 7th election. 19 Do you know as we sit here approximately how 20 many polling places there were on election day for 21 the February 2020 primary? 22 A. I may be slightly off, but if my memory 23 serves me -- did you say for the April election or 24 February? 25 Q. For February since April changed on the fly.</p>
<p style="text-align: right;">142</p> <p>1 WEC has done and is presently doing with regard to 2 the fall election. Your earlier testimony also 3 referenced the fact that things continue to evolve 4 and change. 5 Is that a fair representation of your 6 testimony? 7 A. Yes. 8 Q. Has anything changed between June 25th and 9 now with regard to the contents of that report? 10 A. I think the report still captures the major 11 initiatives, but, you know, we continue to do all 12 kinds of things as stuff comes to our attention. 13 Like I said, yesterday we had a meeting with state 14 public health officials to start going through some 15 of the guidance documents. So, you know, I think 16 the broad categories are reflected, but there's a 17 lot of smaller projects happening under those 18 umbrellas. 19 Q. And those smaller projects, those are those 20 things that happen on a fairly consistent basis, as 21 you discussed earlier? 22 A. Yes. 23 Q. Who are involved in those projects? Can you 24 give me an overview if it's just WEC and the 25 disability committee that we discussed earlier? Are</p>	<p style="text-align: right;">144</p> <p>1 A. I don't know for February. It changes from 2 election to election. So a smaller election may 3 have fewer, and then it might change for something 4 like April. I know the April numbers since I've 5 seen them in reports. I don't know the February 6 numbers. 7 Q. Let's go with the April numbers. 8 Do you know the April numbers -- what were 9 the April numbers, as you understand them? 10 A. If I remember correctly -- and I'm not 11 trying to give any incorrect information, but if my 12 memory serves me, for the April 7, 2020, election, 13 there were approximately 2,156. That was in 14 comparison to the last presidential where there were 15 about 2,400. 16 Q. Those April numbers -- and I appreciate that 17 these are approximations. 18 The April 2020 numbers, were those the 19 number of actual polling places after the 20 consolidation, or were those the number of polling 21 places that were intended prior to the 22 consolidation? 23 A. No, that was from what we understand the 24 actual polling places that were in use. Again, all 25 of our data is the municipal clerks in each of 1850</p>

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<p style="text-align: right;">145</p> <p>1 jurisdictions relating information to us, so the 2 data is only as good as what they report. But it 3 was a report pulled about how many polling places we 4 believed that they had. 5 Q. Does the WEC have any role with regard to 6 selecting polling places? 7 A. No. 8 Q. And you mentioned earlier that the WEC may 9 review local officials' selections with regard to 10 accessibility; is that correct? 11 A. That's correct. There's a survey; but, 12 ultimately, it's kind of us providing guidance and 13 making sure that they've considered all of the 14 items. We're not the decision makers. 15 Q. So they give you the survey, and do you 16 point out where there might be deficiencies? 17 A. Yes. 18 Q. And what happens after that? 19 A. It's sent to the municipality, and it's now 20 their responsibility to make sure that they're 21 remedying any of those deficiencies. 22 Q. And what happens if they don't remedy the 23 deficiency and the poll just opens on election day 24 with that deficiency? 25 A. Well, if we received a complaint from</p>	<p style="text-align: right;">147</p> <p>1 A. I don't know. I'd have to look at it. I 2 don't know. I don't believe -- I don't know what 3 the statutes require for that kind of complaint. 4 Q. I just have a couple more questions. 5 5.25 sub-four also requires the Commission 6 to ensure that the voting systems used at each 7 polling place will permit all individuals with 8 disabilities to vote without the need for assistance 9 and with the same degree of privacy that is accorded 10 to non-disabled electors voting at the same polling 11 place. 12 Are you familiar with that portion of the 13 statute? 14 A. Yes. 15 Q. What does the Commission do to ensure the 16 statute is effectuated? 17 A. So, again, there's the survey that they 18 submit when they're opening new polls that includes 19 that they have accessible voting equipment. Upon 20 the issuance of the some of the original HAVA 21 funding, there were subgrants given to jurisdictions 22 to make sure they all had accessible voting 23 equipment. We also do an audit program where we 24 send out auditors that are either temporary staff or 25 volunteers from our accessibility advisory committee</p>
<p style="text-align: right;">146</p> <p>1 someone bringing it to our attention, then that 2 would go before the full commission, and they would 3 consider that. They would issue their decision if 4 they thought that there was any wrongdoing that 5 happened there, and we could ultimately issue an 6 order. But, again, we've got no sanction powers, 7 anything like that. It would be just, sort of, the 8 first step of the party who experienced the 9 complaint potentially seeking litigation. 10 Q. So that would just be filing a complaint 11 under the typical complaint procedures, or is there 12 a specific complaint procedure for this sort of 13 issue? 14 A. It could be under any of the -- so the 15 statutes outline specific types of complaints. We 16 have sworn complaints that go to the full 17 commission. There's informal complaints. You know, 18 every single informal complaint doesn't go to the 19 full commission. And then we do have an avenue now 20 on our website through our complaint process for 21 voters to file accessibility-specific complaints as 22 well, which would go to the full commission. 23 Q. You said that was on the website? 24 A. Yes, under complaint. 25 Q. Does that require swearing?</p>	<p style="text-align: right;">148</p> <p>1 that go out to the polling places and survey to make 2 sure that they -- to put together reports of any 3 deficiencies that are identified. But, ultimately, 4 the jurisdiction is responsible for making sure that 5 they have all of those things, that they're in 6 compliance. 7 Q. And when the statute refers to voting 8 system, what does that mean? 9 A. It's our understanding that that is the 10 actual ballot-marking device. 11 Q. What sort of ballot-marking devices are used 12 in Wisconsin? 13 A. There's a few types. I'm -- you know, I 14 fancy myself an expert on a lot of things elections, 15 but voting equipment isn't my, you know, area of 16 specific expertise. But there are some that can be 17 used by all voters. You know, I know in Madison we 18 have an express vote, I think it is, where you can 19 make your selections on the screen. It's then going 20 to print out your ballot for you to be able to put 21 in the envelope as part of the absentee process. 22 There's some other more legacy systems that are out 23 there. But, basically, they're all systems that 24 allow a voter to be able to mark their ballot 25 privately and independently and have various</p>

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149	<p>1 different accessibility options on it. 2 All the voting equipment that is offered for 3 sale in the State of Wisconsin has to go through 4 federal and state certification, which requires 5 looking at its accessibility components. And our 6 accessibility advisory committee actually does 7 review new systems before they're brought to the 8 Commission. 9 Q. Is the WEC reviewing or planning to review 10 whether these voting systems are equally accessible 11 to immunocompromised voters? 12 A. That is not currently a part of a scheduled 13 discussion. 14 Q. As you sit here, do you know if there is a 15 way to ensure that these voting systems are equally 16 accessible to immunocompromised voters versus 17 disabled electors? 18 A. I'm sorry. I don't know how to make that 19 determination. 20 Q. All right. Just give me a second. I think 21 I've gone through my questions, but if you could 22 bear with me for a few seconds so I can check my 23 notes. 24 All right. I think that's all I have. 25 Thank you very much, Ms. Wolfe.</p>	151	<p>1 Second-to-last page. 2 VIDEO TECH: No worries. 3 BY MR. BROWNE: 4 Q. Ms. Wolfe, do you understand you've been 5 designate to testify as the 30(b)(6) representative 6 of the Wisconsin Elections Commission and give 7 testimony as to the topics that you see on the 8 screen before you? 9 A. Yes. 10 MR. BROWNE: Leyhbert, you can take that 11 down. 12 VIDEO TECH: Thank you. 13 MR. BROWNE: Thank you. 14 BY MR. BROWNE: 15 Q. Ms. Wolfe, I just want to talk generally 16 about the roles of the Commission versus 17 municipalities and counties in Wisconsin elections. 18 How does the role of the Commission differ 19 from the role of municipalities and counties? 20 A. I'll try to keep my answer focused, but 21 that's a pretty big, broad question. Maybe a fair 22 way to summarize it would be that we are providing 23 the framework, the best practices, the guidance, 24 training to the local election officials, the 25 technology and the systems; and the local election</p>
150	<p>1 A. Thank you. 2 MR. BROWNE: Ms. Wolfe, my name is Robert 3 Browne. I represent the legislature in these 4 matters. If you need take a break -- are you okay 5 to proceed forward? 6 THE WITNESS: I'm okay to proceed, thank 7 you. 8 MR. BROWNE: Can you hear me okay? 9 THE WITNESS: Now I can. 10 MR. BROWNE: Okay. 11 Leyhbert, could you put up Legislative 12 Exhibit 1-A, please? 13 VIDEO TECH: Yes. I'm going to mark it as 14 the number we were doing already. 15 MR. BROWNE: Sure. 16 (Exhibit 13 was marked for identification 17 and is attached to the transcript.) 18 VIDEO TECH: Give me one second. This is 19 going to be Exhibit No. 13 for the record. 20 DIRECT EXAMINATION 21 BY MR. BROWNE: 22 Q. Ms. Wolfe, have you seen that before? 23 A. Yes. 24 MR. BROWNE: And Leyhbert, could you go to 25 the last page, sorry -- yeah, that page. Sorry.</p>	152	<p>1 officials are the ones that register voters, issue 2 ballots, determine who's eligible to receive a 3 ballot, receive and count ballots, that hire the 4 poll workers. So they're the ones who are the 5 decision makers in terms of who gets to participate, 6 who's eligible in answering that data; and we are 7 responsible more or less for the framework in 8 supporting them. 9 Q. Can the Commission impose requirements on 10 municipalities or counties regarding how they run 11 elections? 12 A. We can give them guidance or best practices 13 on what we believe to be the statute requirements 14 for a court's decision, but, you know, we have very 15 limited authority to be able to do anything to force 16 or compel them to. So we give them, again, the 17 framework. We lead them to the statute 18 requirements, but there's little we can do to force 19 them to follow it. 20 Q. And you may have briefly touched on some of 21 the questions I'm going to ask now, but we'll just 22 go through them quickly. 23 What is the Commission's role in voter 24 registration? 25 A. Our role, I believe under the statute, is to</p>

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<p>153</p> <p>1 prescribe and develop the form, the registration 2 form. So we look at what the requirements are of 3 the law that has to be on the form, and we release 4 that form. And then we also house the technology 5 that ultimately allows voters to enter -- or I'm 6 sorry -- allows clerks to enter in the 7 registrations. And then we can do things like make 8 sure that they're in the right districts and wards 9 using our GIS technology. We can populate poll 10 books then through the state voter registration 11 database. But, again, we're not making any 12 decisions as part of the voter registration. We're 13 just giving them the framework within to operate and 14 best practices. 15 I guess we would also -- one place that's 16 unique is online voter registration. The statutes 17 say if somebody is registering to vote online, that 18 if the voter is able to make a match between certain 19 designated fields in their voter record and the DMV 20 record, that that registration automatically goes 21 into the system. It doesn't go through a review 22 process. So we're still not a decision maker there, 23 but we facilitate that record being entered. 24 Q. Aside from the online voter registration you 25 just described, who has the ultimate authority on</p>	<p>155</p> <p>1 absentee ballots to voters other than the scenario 2 we discussed previously where we helped facilitate 3 an online ballot for military and overseas voters on 4 the clerk's behalf. The clerks make that 5 determination. So we have systems in place. So if 6 a voter -- if a voter submits their absentee 7 application, the clerk reviews that, they review the 8 photo ID, they make sure that the application is 9 correct and contains all the required elements, they 10 make sure the voter is registered, and then they 11 make the decision to issue the ballot. 12 Our system then allows them to enter that 13 data, and then they can do things like run a report 14 to see how many requests they have outstanding. 15 They can do things like print a label from our 16 system so we can track the ballot. But we're not 17 issuing the ballot nor making any decisions on 18 whether somebody's eligible to use the ballot. 19 Q. What about the Commission's role in 20 returning absentee ballots from voters to election 21 officials? 22 A. That would be the same. We're working on 23 incorporating intelligent mail barcodes. We also 24 prescribe things like the envelopes that absentee 25 ballots are in, so there's a certificate envelope</p>
<p>154</p> <p>1 voter registration? Is it the counties and the 2 municipalities? 3 A. Not the counties but the municipalities. 4 The counties don't have any authority there either. 5 Q. Okay. What is the Commission's role in 6 picking out voting machines? 7 A. Certification. So voting equipment has to 8 be certified at both the federal and the state level 9 before clerks can purchase it and use it in the 10 State of Wisconsin. So when a piece of voting 11 equipment, a new piece, an update and engineering 12 changeover comes through, we review that and make 13 sure that the system makes the statute requirements. 14 We'll go out and conduct a test campaign on the 15 voting equipment to make sure it's functioning in 16 accordance with law. And then the full commission 17 reviews that application to determine if it meets 18 Wisconsin's requirements before it's released to 19 municipalities to use. But municipalities then can 20 make determinations on purchasing any equipment that 21 is certified for use in the State of Wisconsin in 22 their jurisdiction. 23 Q. Ms. Wolfe, what is the role of the 24 Commission in delivering absentee ballots to voters? 25 A. Much like registration, we do not issue</p>	<p>156</p> <p>1 that's required by law for a voter to sign and have 2 their witness sign and certify that they are them. 3 So we prescribe them. We work with USPS to make 4 sure that the mail piece analyst approves the 5 design, that it will work in the overall system. 6 But, again, ultimately, the clerks are the 7 ones having those envelopes printed and making sure 8 that they abide by the best practices we 9 recommended. They don't have to use our labels out 10 of the system. That's choice that they can make. 11 They don't have to check the ballots, but, 12 ultimately, the clerk is the one that's going to 13 receive the ballot. We do not receive any absentee 14 ballots. The law says that ballots have to be 15 received by the clerk by 8:00 p.m. on election day. 16 If they go to the wrong office or come to ours, 17 we'll do our best to try to get the ballot to the 18 clerk, but ultimately has to be in their hands by 19 8:00 p.m. 20 Q. And what about the Commission's role in 21 deciding whether or not absentee ballots should be 22 accepted? 23 A. Again, we provide the framework to the 24 clerks. So as we saw in April, as there were court 25 rulings, we helped to provide what we understand the</p>

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<p>157</p> <p>1 court's directive to be or what we understand the 2 statute to be. But, ultimately, the board of 3 canvassers, who have been appointed by their 4 jurisdictions, you know, represents both political 5 parties, they're the ones that have that 6 decision-making authority to decide if an absentee 7 counts. We're not involved or we don't make a 8 decision in that.</p> <p>9 Q. And what is the Commission's role in opening 10 and closing in-person absentee voting locations?</p> <p>11 A. We do not have a role in approving or 12 reviewing any type of in-person absentee plan. 13 Again, we provide guidance. You know, as we're 14 getting ready to implement the 7th Circuit's 15 mandates, we'll providing guidance on how we believe 16 that court's ruling needs to be implemented, but we 17 do not play any review role nor do the statutes give 18 us any authority to make those decisions.</p> <p>19 Q. What is the Commission's role in setting up 20 drop boxes for absentee ballots?</p> <p>21 A. In the April election, we provided some 22 guidance about things that clerks can consider in 23 terms of ways to service their voters. But we 24 don't -- we can't mandate that or direct them to 25 that, but we can certainly help provide best</p>	<p>159</p> <p>1 poll workers, but we'll do anything we can to 2 support their efforts.</p> <p>3 Q. What is the Commission' role in providing 4 equipment, including PPE, to polling places?</p> <p>5 A. In April and as we plan for -- and we're 6 directed by the Commission for August and November, 7 we have procured those things on their behalf. It's 8 never been something that was part of a discussion 9 before April, and it's not something that's outlined 10 in the statute, who has that responsibility, beyond 11 election supplies being the responsibility of the 12 municipality. But that being said, we have assumed 13 that role to make sure they have what they need 14 because it can be very difficult for small 15 jurisdictions to get access to those things. And so 16 we had to look through our state and national 17 channels to find an adequate supply, but we don't 18 have any sort of statutory mandate that says we have 19 to procure any sort of polling place supplies.</p> <p>20 Q. Thank you for that.</p> <p>21 I want to shift gears a little bit and talk 22 about the April 7, 2020, election.</p> <p>23 MR. BROWNE: Leyhbert, could you put up what 24 was previously designated in the first-day 25 deposition of Ms. Wolfe as Wolfe Exhibit 7?</p>
<p>158</p> <p>1 practices or things that worked well in other 2 communities that they might want to consider.</p> <p>3 Q. What is the Commission's role in determining 4 the location of polling places?</p> <p>5 A. Well, the Commission did have some 6 discussions prior to April based on public health 7 guidance about not using care facilities as polling 8 places. But, again, ultimately, that was guidance 9 to the jurisdictions operating under information we 10 received from the public health official.</p> <p>11 But we give them best practices, you know, 12 suggestions of places that might serve as a good 13 polling places, the accessibility survey, other 14 things to help them to be able to choose a good 15 location. But we don't make that decision nor can 16 we force them to change their polling location.</p> <p>17 Q. What is the Commission's role in staffing 18 polling places?</p> <p>19 A. The statutes give the responsibility to 20 recruit and train polling workers to the municipal 21 clerks. But I mean, I see us all as partners very 22 much in there so we'll do whatever we can to support 23 their recruitment efforts. But at the end of the 24 day, they're the ones that have the responsibility 25 to staff their polling places and to train their</p>	<p>160</p> <p>1 VIDEO TECH: Yes, sir. One second. 2 Okay.</p> <p>3 MR. BROWNE: Well, actually, that's not it. 4 VIDEO TECH: I'm sorry. I thought you said 5 the one that was previously marked.</p> <p>6 MR. BROWNE: Not this deposition, in the 7 first day's deposition.</p> <p>8 VIDEO TECH: On July the 3rd. No worries, 9 no worries, let me get that real quick. Sorry about 10 that. Give me one second. Okay.</p> <p>11 MR. BROWNE: That's it. That's it.</p> <p>12 VIDEO TECH: For the record, this is 13 Exhibit 14. Sorry about that.</p> <p>14 MR. BROWNE: Go ahead, Leyhbert. 15 (Exhibit 14 was marked for identification 16 and is attached to the transcript.)</p> <p>17 BY MR. BROWNE: 18 Q. Just for the record, this is a summary of 19 the April 7, 2020, election for the April 18, 2020, 20 commission meeting; is that correct, Ms. Wolfe?</p> <p>21 A. For the April 18th commission meeting, but 22 yes.</p> <p>23 Q. And if I recall from your previous 24 testimony, you were the one primarily responsible 25 for preparation of this report; is that correct?</p>

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<p style="text-align: right;">161</p> <p>1 A. Yes, that's correct.</p> <p>2 Q. And I think you said it was reviewed by your</p> <p>3 team; right?</p> <p>4 A. Yes.</p> <p>5 Q. When did the Commission begin to discuss the</p> <p>6 effects of COVID-19 on the April 7th election?</p> <p>7 A. So known effects or anticipated effects?</p> <p>8 Q. Anticipated.</p> <p>9 A. I don't know the exact date, but I know that</p> <p>10 we began those conversations prior to the March 12th</p> <p>11 executive order of the governor. Commissioners had</p> <p>12 been involved in conversations prior to that, so I</p> <p>13 would say early March, late February. I'm not sure</p> <p>14 exactly what date they commenced.</p> <p>15 MR. BROWNE: Leyhbert, could you scroll down</p> <p>16 to the bottom of that first page?</p> <p>17 Q. Ms. Wolfe, do you see the section</p> <p>18 "Sanitation Supplies and Personal Protective</p> <p>19 Equipment"? Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. What efforts did the Commission take related</p> <p>22 to sanitation supplies and personal protective</p> <p>23 equipment prior to the April 7th election?</p> <p>24 A. All the efforts. So we worked with our</p> <p>25 state emergency operation center, anyone to try to</p>	<p style="text-align: right;">163</p> <p>1 not they utilized the survey -- you know, some of</p> <p>2 them work five hours a week and aren't</p> <p>3 computer-savvy, but we made efforts to make sure we</p> <p>4 heard from all 1850.</p> <p>5 Q. Did election officials from the City of</p> <p>6 Milwaukee respond to the survey, if you recall?</p> <p>7 A. I'm sorry, I don't recall.</p> <p>8 Q. Do you recall if election officials from the</p> <p>9 City of Green Bay responded to the survey?</p> <p>10 A. I'm sorry, I don't recall if either of those</p> <p>11 entities used the actual survey tool. I don't.</p> <p>12 Q. The Commission did distribute significant</p> <p>13 supplies for the April 7th election; is that</p> <p>14 correct?</p> <p>15 A. Yes, that's correct.</p> <p>16 Q. How did the Commission decide which supplies</p> <p>17 to distribute to which municipality or county?</p> <p>18 A. It was mostly based on need. I mean,</p> <p>19 getting a bunch of supplies that you don't even know</p> <p>20 if you're going to get and then breaking them up for</p> <p>21 over 2,000 polling places is not an exact science.</p> <p>22 But we tried to gauge what they were reporting to us</p> <p>23 in terms of need with our understanding of how many</p> <p>24 polling places there were and with our understanding</p> <p>25 of what the public health guidance was. So it was</p>
<p style="text-align: right;">162</p> <p>1 find supplies in the supply chain. And we were</p> <p>2 facing difficulty finding things like PPE or</p> <p>3 sanitizer. So we continued to work with our</p> <p>4 partners at Department of Administration, at the</p> <p>5 state emergency operations center to get access to</p> <p>6 those. We ended up working with the distillery in</p> <p>7 Wisconsin to procure sanitizer that was made for us.</p> <p>8 But then we worked with the state emergency</p> <p>9 operations center to also distribute all those</p> <p>10 supplies through the counties as well so the</p> <p>11 counties could distribute them to each of their</p> <p>12 municipalities in short order.</p> <p>13 Q. If I recall from your earlier testimony on</p> <p>14 your first day, the Commission sent out a survey to</p> <p>15 local election officials about needs for sanitation</p> <p>16 supplies and PPE; is that correct?</p> <p>17 A. Yes, that's correct.</p> <p>18 Q. And how many election officials responded to</p> <p>19 that survey, if you recall?</p> <p>20 A. I think we ended up getting data for almost</p> <p>21 all of them, so either through them directly or</p> <p>22 working with all the counties to make sure that they</p> <p>23 helped us to reach out to their municipalities to</p> <p>24 make sure they had what they needed. So we made</p> <p>25 every effort to hear from all of them. Whether or</p>	<p style="text-align: right;">164</p> <p>1 kind of a confluence of all of those factors</p> <p>2 determined who, sort of, got what in which box that</p> <p>3 was distributed.</p> <p>4 Q. Do you recall if supplies were distributed</p> <p>5 to the City of Milwaukee?</p> <p>6 A. Yes, I believe they were. Yes.</p> <p>7 Q. Do you know what supplies were distributed</p> <p>8 to them?</p> <p>9 A. I have no reason to believe that they didn't</p> <p>10 get the same supplies as everyone, which it would</p> <p>11 have been the alcohol-based sanitizer for hands and</p> <p>12 surfaces, gloves, masks, painter's tape, pens. I'm</p> <p>13 sure I'm forgetting something. You know, there was</p> <p>14 such limited -- there was supply chain shortage on</p> <p>15 paper towels, so we tried our best to try to get</p> <p>16 them things like paper towels. There were some that</p> <p>17 got things like Clorox surface wipes and things like</p> <p>18 that, but I believe they got all of those things.</p> <p>19 Q. Do you recall if the City of Green Bay</p> <p>20 received supplies?</p> <p>21 A. Again, I don't know specifically about their</p> <p>22 shipment, but I have every reason to believe that</p> <p>23 they received the same supplies as everyone.</p> <p>24 Q. If you --</p> <p>25 MR. BROWNE: Leyhbert, could you turn to</p>

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<p style="text-align: right;">165</p> <p>1 page 3 of that exhibit, please?</p> <p>2 VIDEO TECH: Sure.</p> <p>3 BY MR. BROWNE:</p> <p>4 Q. Ms. Wolfe, what efforts did the Commission</p> <p>5 take related to the WisVote database prior to the</p> <p>6 April 7th election?</p> <p>7 A. We -- prior to April 7th or during</p> <p>8 April 7th, we made a lot of changes to the system,</p> <p>9 such as increasing capacity, changing user</p> <p>10 interfaces to make sure that we were able to</p> <p>11 interact with the system. We also created some new</p> <p>12 reports and entities based on requests of some of</p> <p>13 our larger jurisdictions so that they could use a</p> <p>14 report to process all of their absentee ballots</p> <p>15 rather than having to go through each individual</p> <p>16 e-mail. So we made some significant changes in that</p> <p>17 respect.</p> <p>18 I'm sure I'm forgetting some things, but</p> <p>19 there was a lot that had to happen. A lot of it had</p> <p>20 to do with just adjusting to the new volume, both on</p> <p>21 the voter side for absentee ballots and then on the</p> <p>22 clerks' side to make sure they had the tools they</p> <p>23 needed to process that increase.</p> <p>24 Q. Ms. Wolfe, did those changes improve WisVote</p> <p>25 for the April 7th election?</p>	<p style="text-align: right;">167</p> <p>1 to be able to support that.</p> <p>2 We did a lot of additional load testing.</p> <p>3 Even after April, our load-testing efforts were</p> <p>4 focused on find my polling place because we had seen</p> <p>5 a record number of people, surprisingly, in February</p> <p>6 utilizing that feature on our website. So we</p> <p>7 had contracted to load test find my polling place</p> <p>8 and the addressing features. And then literally</p> <p>9 overnight, we had to adjust our approach to do all</p> <p>10 that load testing on absentee features, absentee</p> <p>11 functionalities on the website. So that's probably</p> <p>12 where some of the main changes happened on the</p> <p>13 MyVote site.</p> <p>14 Q. I'm not very tech-savvy. Can you explain</p> <p>15 what you mean by load testing?</p> <p>16 A. Sure. So load testing is where you simulate</p> <p>17 traffic to your site, but you, kind of, think of</p> <p>18 what is the biggest traffic or capacity scenario</p> <p>19 that you can imagine. And in this case now, you</p> <p>20 know, for a while all the streams have been blown</p> <p>21 out of the water, so you have to go even beyond that</p> <p>22 and say what would -- try to break the system, try</p> <p>23 to see what is the breaking point, what is the</p> <p>24 capacity point, and then recognize, well, why do I</p> <p>25 have that capacity limit, so that you can implement</p>
<p style="text-align: right;">166</p> <p>1 A. Yes. Improvements may suggest it was</p> <p>2 something we could have or should have known about</p> <p>3 to be able to improve, but we were able to adjust</p> <p>4 the system to be able to be more efficient and</p> <p>5 effective for our users in light of brand-new voter</p> <p>6 and clerk behavior.</p> <p>7 Q. And I didn't mean to imply anything by</p> <p>8 "improvement."</p> <p>9 So you were able to adjust accordingly so</p> <p>10 that WisVote operated for the April 7th election; is</p> <p>11 that correct?</p> <p>12 A. Yes, that's correct.</p> <p>13 Q. If we could turn to page 4 of the Wolfe</p> <p>14 Exhibit 7, Ms. Wolfe, what efforts did the</p> <p>15 Commission take related to MyVote prior to the</p> <p>16 April 7th election?</p> <p>17 A. So along the same lines. MyVote and WisVote</p> <p>18 are linked together in a lot of ways. MyVote is the</p> <p>19 voter-facing side of things. So we had to make sure</p> <p>20 that we had the capacity to handle all the photo IDs</p> <p>21 and absentee requests that were, I mean, beyond</p> <p>22 record breaking. It was something we couldn't have</p> <p>23 imagined that type of traffic in our wildest dreams</p> <p>24 that was coming through that feature, so we had to</p> <p>25 make sure we had the capacity the server structure</p>	<p style="text-align: right;">168</p> <p>1 fixes so if you ever did run into that capacity</p> <p>2 limit that it wouldn't break the system. So load</p> <p>3 testing is trying to see where your capacity limits</p> <p>4 are, identify why they exist and how you can</p> <p>5 eliminate them.</p> <p>6 Q. Did the adjustments you made to MyVote along</p> <p>7 with the load testing, did that allow MyVote to</p> <p>8 operate correctly and handle the capacity for the</p> <p>9 April 7th election?</p> <p>10 A. Yes, it did. Yes, it did. It was that load</p> <p>11 testing, but I'd be remiss if I didn't say it was</p> <p>12 also people. You know, our state should be really</p> <p>13 lucky for the people that literally didn't sleep for</p> <p>14 weeks because they were sitting next to the servers,</p> <p>15 making sure everything continued to work, and</p> <p>16 adjusting things as they were needed. So it was a</p> <p>17 combination of technology improvements and people.</p> <p>18 Q. Thank you.</p> <p>19 MR. BROWNE: If we can turn to page 5,</p> <p>20 Leyhbert, and scroll down to the bottom, please.</p> <p>21 VIDEO TECH: Yes, sir.</p> <p>22 MR. BROWNE: Thank you.</p> <p>23 BY MR. BROWNE:</p> <p>24 Q. Ms. Wolfe, what efforts did the Commission</p> <p>25 take related to poll workers prior to the April 7th</p>

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<p>169</p> <p>1 election? 2 A. So prior to April, you know, we surveyed the 3 clerks to understand their needs for poll workers. 4 And that was changing all the time, so we continued 5 to keep that dialogue open. We put in a ticket with 6 our state emergency operations center. I sent a 7 letter to the governor. We asked everybody to help 8 us to be able to support the recruitment effort for 9 poll workers in our state because we were hearing 10 from clerks they weren't able to recruit poll 11 workers in their communities. 12 We also did things like create a widget on 13 our website that allowed people to indicate their 14 desire to be a poll worker so we could connect them 15 with the right municipal clerk. Through the state 16 operations center and through some of our other 17 efforts, sent out a blast to all state employees 18 letting them know about opportunities to be poll 19 workers. We put together tools for clerks so that 20 they could send a letter to, let's say, their school 21 district or private industry in their communities 22 asking people to, you know, either support their 23 employees becoming poll workers or become poll 24 workers themselves. I know that there was a push 25 through, I believe, maybe at the operations center</p> <p>170</p> <p>1 to the United Way, their organizations, to encourage 2 people as well. 3 But, ultimately, at the end of the day, 4 jurisdictions weren't able to recruit enough poll 5 workers through all of those efforts, through theirs 6 and ours. So the WEC worked with the National Guard 7 to put together training and to train National Guard 8 members to serve in plainclothes in their 9 communities of residence to make sure that each of 10 the polling places was able to open. So that was 11 the program that we developed and implemented for 12 the municipal clerks. 13 Q. And just to break down, kind of, your answer 14 a little bit, you mentioned a survey. 15 Did you have a response from almost all 16 local election officials on that survey, or was it 17 sporadic? What kind of response did you get on the 18 survey? 19 A. From almost all jurisdictions, yes, we got a 20 lot of -- yes. 21 Q. Do you recall if you got a response from the 22 City of Milwaukee? 23 A. I believe we did. But I don't recall if it 24 came from them, the county, if they let us know 25 another way. I'm not sure.</p>	<p>171</p> <p>1 Q. Do you recall what the response was? 2 A. I'm sorry, I do not. 3 Q. Did you get a response from the election 4 officials in the City of Green Bay? 5 A. I don't know. I'm remembering that perhaps 6 we had some difficulties getting an answer from 7 them, but I would have to double-check the survey to 8 see if they ultimately responded or through some 9 other means. 10 Q. Ms. Wolfe, you mentioned the National Guard 11 program or the National Guard. 12 When did the Commission learn that the 13 governor authorized the National Guard members to 14 serve as poll workers? 15 A. So in that report, I believe I lay out a 16 timeline of when that happened. If my memory serves 17 me correctly, I think it was that Thursday before 18 the election that the order came through. We had a 19 webinar with the clerks on Friday. I might be off 20 by a day. And then the guard was called to duty 21 starting on Sunday, so we had to put together 22 training for all of them for when they reported on 23 Sunday. And then on Monday, they reported to the 24 jurisdictions where they would be or they stayed 25 with their county in case they were needed on</p> <p>172</p> <p>1 election day on Tuesday, and they were all sent out. 2 So as is the nature of the National Guard, it had to 3 be on very short order and by order of the governor. 4 Q. Ms. Wolfe, did election officials from the 5 City of Milwaukee request that National Guard 6 members staff their polling locations? 7 A. Yes, I believe they did. 8 Q. Do you remember how many members of the 9 National Guard they requested? 10 A. I do not. I'm sorry. I have the number 11 somewhere around -- I don't know. I would be 12 speculating, I guess. 13 Q. Do you recall if election officials in the 14 City of Green Bay requested National Guard members 15 staff their polling locations? 16 A. I do not believe so. I do not believe they 17 did. 18 MR. BROWNE: If we could turn to page 6 and 19 scroll down towards the bottom. 20 Q. Ms. Wolfe, what efforts did the Commission 21 take relating to providing guidance and 22 communication for clerks prior to the April 7th 23 election? 24 A. Well, as we always do, we provided guidance 25 to them on election administration, but then, of</p>
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<p>173</p> <p>1 course, in light of the pandemic. So we worked with 2 a public health official to write many, many 3 documents that, sort of, reconceptualized election 4 processes and then get their feedback on, you know, 5 that process and incorporate the guidance that they 6 were giving us. 7 So an example of that might be something 8 like voter photo ID for election day, how to do that 9 without having to do a hand-to-hand transaction. So 10 we put together a guidance documents, part of a 11 checklist. We also did videos for the local 12 election officials. Webinars, we did something like 13 three to four webinars a day at some points so they 14 could all join in and ask questions. And we had to, 15 kind of, reconceptualize within the parameters of 16 the statute what some of those things would look 17 like. 18 So, for example, using the painter tape we 19 sent them to put a little box on the table and ask 20 the voter to step up, put their photo ID down and 21 step away so the poll worker can step up, take a 22 look at it, make sure it complies with the poll 23 book. Then the poll worker steps away and the voter 24 comes up to get the ID and sign their poll book. So 25 all those different steps in elections had to be</p>	<p>175</p> <p>1 Q. Thank you. 2 And, in fact, in the report, you said WEC 3 staff sent more than 50 communications and guidance 4 documents to clerks; is that right? 5 A. Yeah, that's right. So that's probably a 6 pretty low estimate, but that's right. 7 Q. And did the WEC have a policy of sending 8 communications before an election? Was there a 9 number? I think in the report you mentioned an 10 average of ten? 11 A. Uh-huh. 12 Q. Did the WEC have a policy on that? 13 A. I don't know if it's a policy as much as we 14 have all these clerk feedback committees. And over 15 the years, one of them is on communications. So 16 there was a clerk communication protocol in which 17 the clerks had told us, rightfully so, you know, in 18 the days around an election, we're really busy, so 19 please don't change things on it, please don't send 20 us something new or think that you want to wait 21 until the last minute to instruct us on something. 22 You need to be communicating with us ahead of time 23 so we can get things set up. 24 And so our protocol that we had developed 25 with the clerks had always been to really limit</p>
<p>174</p> <p>1 reconceptualized with the guidance of a public 2 health expert for us to be able to reissue a lot of 3 this guidance. 4 Communication was also very, very important. 5 And as the most decentralized election 6 administration in the state, anytime you want to 7 communicate with 2,000 local election officials, 8 it's certainly a challenge, but we tried to keep 9 them in the loop on a daily basis. 10 We implemented what we call our RAVE alert 11 system, which is where local election officials can 12 sign up and give us all their e-mail addresses, 13 phone numbers, so that if there's something really 14 high priority, we can send out a blast to them 15 letting them know about something like a court 16 ruling the night before the election. So there were 17 a lot of things happening in terms of communication. 18 Q. Is it fair to say that the Commission sent 19 out quite a few communications and guidance before 20 the April 7th election? 21 A. I'm not sure how to quantify it, but yes, a 22 lot is probably an understatement. Yes, there was a 23 great deal of communication and guidance that was 24 sent out in the weeks prior to and then after the 25 election.</p>	<p>176</p> <p>1 communication in the weeks before the election 2 because they are implementing under the guidance 3 that we have been training them on for the year 4 preceding. 5 Q. Thank you. 6 MR. BROWNE: If we could turn to page 7 of 7 that exhibit. 8 Q. Ms. Wolfe, regarding polling place 9 consolidation for the April 7th election, who is 10 responsible for consolidating a polling place? 11 A. The municipality. 12 Q. Does WEC play any role in that? 13 A. No, again, other than to provide guidance 14 about what we think the requirements are or how that 15 can be accomplished in accordance with a statute. 16 Q. Once a polling place has been consolidated, 17 can a jurisdiction open up additional polling 18 places? 19 A. I'm not sure of the answer to that. I 20 believe that that would require their municipal body 21 to approve that change if they were going to change 22 in that circumstance. There are some provisions in 23 the law for election day. So if on election day 24 there have been to be changes to polling place 25 because of an emergency, some place becomes</p>

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177	<p>1 unavailable, then they're able to do that outside of 2 sort of that parameter. 3 Q. Again, the Commission doesn't have any role 4 in that; is that correct? 5 A. That's correct. 6 Q. Stepping away from Exhibit 7, do you recall 7 that a court ordered the Commission to extend 8 electronic voter registration prior to the April 7th 9 election to March 30, 2020? 10 A. Yes, and I did forget to talk about that 11 when we talked about WisVote changes. There were a 12 couple of changes related to registration and then 13 the absentee deadline where we had to make 14 significant revisions to the WisVote. 15 Q. Were those the only actions of the 16 Commission based on that court order? 17 A. We implemented any of the court's orders to 18 us, so I don't remember in specificity that 19 particular one. There were many. 20 Q. Okay. Ms. Wolfe, do you recall that a court 21 ordered the Commission to accept absentee ballots 22 for the April 7th election if they were postmarked 23 by April 7th and received within a week of the 24 election? 25 A. Yes.</p>	179	<p>1 yes. 2 MR. BROWNE: If we could go to page three of 3 the document, and could you scroll down, please? 4 Excuse me. Scroll back up, Leyhbert. I'm sorry. 5 VIDEO TECH: No worries. 6 BY MR. BROWNE: 7 Q. Ms. Wolfe, at the top it states that, 8 Absentee voting in the April 2020 election reached 9 unprecedented levels but Wisconsin voters, local 10 election officials, and administration systems 11 largely adapted to the demand and managed the volume 12 successfully. 13 Do you see that? 14 A. Yes, I do. 15 Q. And what did you mean by that statement? 16 A. I think this was diplomatic way of saying it 17 was incredibly challenging, but we found a way, 18 along with our local election partners, to overcome 19 just challenge after challenge after challenge. So 20 a lot had to happen to make that work, but at the 21 end of the day, we believed we did everything we 22 humanly could. 23 Q. It further states, At the macro level, the 24 processes to request, receive, return, and review 25 absentee ballots proceeded normally and without</p>
178	<p>1 Q. What did the Commission do to implement the 2 court's order? 3 A. I believe we issued guidance to the clerks 4 multiple times. So we issued guidance when the 5 court ruling happened, and then we probably sent out 6 a RAVE alert and gave them information about how we 7 believed that that process should be conducted 8 during the board of canvass. 9 MR. BROWNE: Leyhbert, if we could call up 10 Wolfe Exhibit 8 from the first day of deposition of 11 Ms. Wolfe, please? 12 VIDEO TECH: Yes, sir. One second. 13 (Exhibit 15 was marked for identification 14 and is attached to the transcript.) 15 MR. BROWNE: For the record, this is going 16 to be Exhibit No. 15 for this Volume 2. 17 BY MR. BROWNE: 18 Q. Ms. Wolfe, I think you've seen this now -- 19 this is probably the third time you've seen this, 20 maybe even the fourth time. 21 But this is the April 7, 2020, absentee 22 voting report published on May 15th; is that right? 23 A. Yes, that's correct. 24 Q. And you prepared this document; correct? 25 A. Along with, yes, members of the WEC staff,</p>	180	<p>1 inconsistencies. 2 What did you mean by that statement? 3 A. Let me just read it real quick. Thank you. 4 Q. It's the second sentence in that first 5 paragraph. Sorry, I should have pointed it out. 6 A. I believe that that statement references to 7 the data. So, again, just, kind of, relating the 8 data in terms of percentages of ballots and the 9 categories it fell into, it was consistent with 10 other elections even though the volume and the 11 circumstances had changed greatly. 12 Q. Okay. 13 MR. BROWNE: If we could turn to page 7, 14 please, of the report? 15 Q. And if we look at table 6, Ms. Wolfe, that 16 1.8 percent of absentee ballots were rejected for 17 this election, do you see that? 18 A. Yes, I do. 19 Q. Why were those ballots rejected? 20 A. Well, because the absentee canvassers 21 decided that they couldn't be -- they didn't meet 22 the requirement of a ballot that could be counted, 23 either because of the statutes or a court decision. 24 So it could be for any number of reasons. 25 Q. Okay. Was this percentage, the 1.8 percent,</p>

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181	<p>1 was that consistent with past elections? 2 A. According to the data we present about some 3 of the recent April elections, it appears to be in 4 line with the percentage. 5 Q. And do you know if the volume of absentee 6 voting in the April 7th election affected why 7 ballots were rejected? 8 A. We don't have -- as we discussed before, we 9 don't have the granular level about every 10 determination that was ultimately made by board of 11 canvassers about why they rejected the ballot. So 12 we can't really compare that data, so I don't know 13 that I have the information needed to answer that 14 question. 15 Q. Sure. If we look at table 7, it notes that 16 9.3 percent of absentee ballots were not returned. 17 Do you see that? 18 A. Yes. 19 Q. What does this mean? 20 A. So these are, I believe, either voters who 21 didn't return their ballots, so they chose not to 22 return it, or it might be somebody that -- I think 23 included as part of this data set -- it's been a 24 while since I've dug into it. I believe that this 25 could also be people that maybe chose to vote a</p>	183	<p>1 the -- (Inaudible.) 2 A. I'm sorry. I lost you there. 3 Q. Sorry. That's okay. If you look at that 4 bottom table, table 8, it notes that between 4-8 and 5 4-13, 6.6 percent of absentee ballots were returned. 6 Does the Commission have data explaining the 7 reason why these ballots were returned in that 8 window of time? 9 A. Data? No. I mean, we wouldn't know the 10 voters' reasoning for why they submitted their 11 ballot during that period of time. You know, it was 12 because of a court ruling that that time period 13 existed because usually, under statute, ballots have 14 to be returned by 8:00 p.m. on election day. 15 MR. BROWNE: If we could turn to page 24 of 16 this exhibit, Leyhbert. 17 VIDEO TECH: Yes, sir. Page 24. 18 BY MR. BROWNE: 19 Q. And in the conclusion section, Ms. Wolfe, it 20 states that, Moreover, the final election data 21 conclusively indicates that the election did not 22 produce an unusual number of unreturned or rejected 23 ballots. 24 Do you see that? 25 A. I do not. Can you point it out?</p>
182	<p>1 different way. So it could be someone that didn't 2 return their absentee because they were going to 3 vote, you know, curbside absentee or they were going 4 to appear in-person. 5 Q. The report notes that -- sorry. Strike 6 that. 7 Is the percentage of the not-returned 8 absentee ballots, the 9.3 percent, is that 9 consistent with past elections? 10 A. It seems to vary quite a bit, but it seems 11 to be -- I don't know. I don't know if I'd qualify 12 that as in line. I guess in the two previous 13 elections before it, it seems like a very comparable 14 percentage, but there is some variation to earlier 15 elections. 16 Q. But it seems to be on the lower end of at 17 least the past four or five elections? 18 A. It is the lowest percentage since 2017, 19 yeah. 20 Q. Ms. Wolfe -- excuse me. 21 MR. BROWNE: Leyhbert, if we could scroll 22 down a little to the bottom of that page. 23 Q. Ms. Wolfe, do you see that it notes that 24 6.68 percent of the absentee ballots were returned 25 between 4-8 and 4-13? Does it have data explaining</p>	184	<p>1 Q. Yeah, it's the second sentence of that 2 conclusion paragraph. 3 A. Okay, thank you. Okay. 4 Q. Can you explain what that -- what you meant 5 when you wrote that? 6 A. Yes. So that in the data charts that we 7 just reviewed, that the percentages of ballots were 8 in line with what we historically had seen in our 9 data sets. So looking back, I might have reviewed 10 something with percentage or rates instead of number 11 because the number was different but the percentage 12 was relatively the same. 13 Q. I want to shift gears again, Ms. Wolfe, and 14 talk about the upcoming elections. 15 MR. BROWNE: Leyhbert, if you could call up 16 Wolfe Exhibit 9 from the first day of Ms. Wolfe's 17 deposition? 18 VIDEO TECH: Exhibit No. 9? 19 MR. BROWNE: Yes. 20 VIDEO TECH: One second. 21 (Exhibit 16 was marked for identification 22 and is attached to the transcript.) 23 VIDEO TECH: For the record, this is going 24 to be Exhibit No. 16 of today's deposition. 25</p>

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<p>185</p> <p>1 BY MR. BROWNE: 2 Q. Ms. Wolfe, is this the status report that 3 the Commission filed with the court on June 25, 4 2020? 5 A. Yes, it is. 6 Q. Does this document describe what the 7 Commission is doing to prepare for the November 8 elections? 9 A. In part, as of that date. As discussed 10 previously, there is going to be new things added to 11 this continually. 12 MR. BROWNE: If we could turn to page 3 and 13 part B? That's it. 14 Q. Ms. Wolfe, if you could just summarize, just 15 briefly, what is the Commission planning for 16 absentee ballot mailers for the November 2020 17 election? 18 A. So the Commission directed staff to use 19 federal CARES Act grant funding to send absentee 20 ballot request forms in addition to an informational 21 mailer that explains the three ways to vote. It 22 explains where voters can go for more information 23 about COVID efforts as it relates to elections. It 24 explains photo ID. It explains voter registration 25 and those mailers and absentee request form, as well</p>	<p>187</p> <p>1 outlined in here to make that process for them to 2 issue ballots easier for us to be able to track them 3 using the intelligent mail barcodes. So there's a 4 lot of infrastructure surrounding absentee that 5 we're working on but not actual requests for 6 ballots. 7 MR. BROWNE: If we could turn to page 4, 8 please, and part C? This is -- part C is sanitation 9 and PPE supplies. 10 Q. Ms. Wolfe, if you could briefly summarize 11 what is the Commission planning with respect to 12 providing sanitation and PPE supplies for the 13 November 2020 election? 14 A. Yes, we're working to procure all of the 15 supplies. Hopefully, we'll get some more 16 traditional supplies for sanitizer and whatnot, but 17 to procure all of the supplies that were part of the 18 checklist of the public health guidance for both 19 August and November. So we're working to give each 20 of the municipalities and polling places the 21 sanitizer they need, masks that they need, gloves, 22 which, you know, is not necessarily a requirement 23 but something that sometimes make poll workers feel 24 better when they're working with dirty materials. 25 And then there are things like pens, painter's tape,</p>
<p>186</p> <p>1 as a business reply envelope so that if a voter does 2 send back a request form, they don't have to pay for 3 postage, that those are going to go to voters that 4 don't currently have an absentee request on file for 5 the August or November election. 6 Q. Has the Commission implemented this plan? 7 A. Yes. They directed us to send out the 8 mailer on September 1st, so there's a lot of things 9 you have to think about in terms of deadlines and, 10 you know, registration deadlines and all these 11 things. So September 1st was determined to be the 12 best day to send that mailer out so voters would 13 have time to make any changes to their voter record 14 or request their absentee ballot if they so chose. 15 So we started printing them. It's going to take a 16 couple of months to print and stuff all of those 17 envelopes. So we have to find climate-controlled 18 storage to keep them all until they can be sent on 19 September 1st. 20 Q. Does the Commission plan on making any 21 additional efforts related to absentee ballots 22 related to the November 2020 election? 23 A. Ballots, no. So, you know, again, that's 24 the role of the municipality to send in and receive 25 those. But we're making many efforts that are</p>	<p>188</p> <p>1 surface wipes or cleaner, isopropyl wipes for voting 2 equipment. We're working to get all of those things 3 to the local jurisdiction. 4 Even, you know, like I said before, down to 5 spray bottles and paper towels because we found that 6 there were shortages on those things in April. So 7 we're finding that for them as well. We're hoping 8 to send all of the supplies that we've procured out 9 to the local jurisdictions before the August 10 election. And so that way they'll have all those 11 basic supplies and, hopefully, we won't face supply 12 chain shortages when we're competing with all 50 13 states for resources in November. They'll have 14 everything, at least the basics that they need for 15 now, as we head into November. And they'll be able 16 to reassure their poll workers, their voters, that 17 they have the basic things rather than breaking it 18 up into two separate distributions. The National 19 Guard will be helping us with that distribution 20 through all the counties around the state. And we 21 hope to do that by the end of July. 22 Q. Has the Commission been communicating with 23 the local counties and municipalities about this 24 plan for sanitation supplies and PPE? 25 A. Yes. So we continued to survey them about</p>

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48 (189 to 192)

189	<p>1 poll workers and PPE and sanitizer to understand 2 their needs. Then, as we talked about before, we 3 also have some other checks that we do on our side 4 to make sure they are going to have what they need 5 to be able to implement the public health guidance. 6 I also want to note that this is what we're 7 planning right now. You know, we recognize that 8 something new could be needed as we head into 9 November. We wanted to get them the basics out for 10 August and, hopefully, that will be sufficient. But 11 if they need more or they need more help, we'll 12 continue to support them in those efforts. 13 Q. Ms. Wolfe, do you recall if the Commission 14 has had any discussion specifically with the City of 15 Milwaukee about sanitation supplies and PPE for the 16 August and November election? 17 A. I'm not sure we've had specific 18 conversations with them. And I believe that we've 19 received data from them as part of the survey. 20 Q. And do you know what that data said? 21 A. I'm sorry, I do not. 22 Q. What about the City of Green Bay, has the 23 Commission had communications with them about 24 sanitation supplies and PPE supplies for the August 25 and November election?</p>	191	<p>1 higher rate of absentee. It could also be other 2 supplies, printing costs, cleaning supplies, 3 protective equipment, anything related to those 4 efforts. 5 Q. Ms. Wolfe, which municipalities will be 6 eligible for this money, these grants? 7 A. All of them. Each of the 1850. 8 Q. And do the municipalities need to submit a 9 subgrant agreement to request the funds? 10 A. Yes, they do. It's a pretty simple MOU that 11 they have to submit that we'll then issue the checks 12 right away to them. 13 Q. When you say MOU, do you mean memorandum of 14 understanding? 15 A. Yes. 16 Q. What is the deadline for these MOUs? 17 A. I'm sorry, I'm not sure. We've got four 18 subgrants going right now. I believe it's 19 September. 20 Q. Do you know which municipalities have 21 already submitted MOUs to get these subgrants? 22 A. I have a spreadsheet, but I don't have it in 23 my mind. I think it's about 600 per jurisdiction. 24 Q. Do you know if the City of Milwaukee has 25 submitted an MOU?</p>
190	<p>1 A. I'm sorry, I do not. I don't know. I 2 haven't personally had those conversations, but I'm 3 not aware of any specific communication. 4 Q. Okay. 5 MR. BROWNE: If we could turn to page 5, 6 part D. 7 Q. Ms. Wolfe, again, if you could summarize 8 briefly, what is the Commission planning with 9 respect to providing funding to municipal clerks, 10 these subgrants that are mentioned here? 11 A. Well, we're well under way. As of today, 12 we've issued about \$2 million of these subgrant 13 funds. This is for the CARES Act subgrants to 14 municipalities. So the Commission directed staff to 15 implement a subgrant program up to \$4.2 million to 16 provide subgrants to each jurisdiction at the rate 17 of a \$200 base grant. We've got a lot of really 18 tiny jurisdictions so that gives them at least a 19 base. Plus \$1.10 ten per registered voter to 20 scale -- uses under the federal grant. 21 But the ultimate goal of that grant or the 22 use of that grant is to prepare election 23 jurisdictions for changes, unanticipated changes in 24 the initiatives related to COVID-19. So, you know, 25 it may be things like envelopes or postage or the</p>	192	<p>1 A. I believe they have. I believe they have. 2 Q. What about the City of Green Bay, have they 3 submitted an MOU? 4 A. I don't know. I don't know the answer to 5 that. 6 Q. And I think you testified just a few minutes 7 ago that you've already distributed \$2 million in 8 the grant money; is that right? 9 A. That's correct. 10 Q. Do you know which municipalities have 11 received this grant money? 12 A. I believe that it's all of them that we've 13 processed, so about 600. 14 Q. Do you know if Milwaukee was one of those 15 recipients? 16 A. I believe so. I believe in the spreadsheet 17 I reviewed yesterday, they were included. 18 Q. What about the City of Green Bay? 19 A. I didn't look specific. I don't remember 20 seeing them, but it may have been included in the 21 list of 600. I'm not sure. 22 MR. BROWNE: If we could turn to page 6 and 23 part E? Everybody's favorite topic, intelligent 24 mail barcodes. 25 Q. Just briefly, Ms. Wolfe, if you could</p>

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Transcript of Meagan Wolfe
 Conducted on July 16, 2020

49 (193 to 196)

193	<p>1 summarize what the Commission is planning with 2 respect to developing intelligent mail barcodes? 3 A. Well, so this has actually been implemented 4 at this point. The team works fast. They have 5 worked with the clerk feedback committees to -- and 6 the USPS to create a process where clerks who use 7 our system to print off their absentee labels can 8 use an intelligent mail barcode, which will allow 9 clerks, voters, us to track ballots just like you 10 would a package. So we have an interface on MyVote 11 where a voter can go to track the ballot, but it 12 will also have its own unique IMB identifier. 13 And so if a clerk uses our WisVote system to 14 create their labels for absentee ballots, that label 15 will have the intelligent mail barcode on it that 16 will track the ballot both going to the voter and 17 coming back. 18 Now, we're learning a lot about the mail 19 service that we didn't know. And some small postal 20 branches have equipment they need to scan in ballots 21 or any intelligent mail barcode right when they get 22 it at their rural local postal branch. Others 23 don't, and so it might not start tracking until it 24 gets to a central sorting center. So, you know, 25 there are some differences, but that is a capability</p>	195	<p>1 right, to have conversations about changes or how we 2 want to improve things. And so we formed clerk 3 advisory committees. We have them on a lot of 4 different topics. We have them on training, 5 communications, election security. And after the 6 April 7th election, we also formed some committees 7 to help us work on absentee voting in general, 8 intelligent mail barcodes, processing the WisVote. 9 So we have these work groups basically with the 10 clerks where they help us understand their 11 experience, problems they faced, improvements they 12 want to see. We'll, sort of, prototype those for 13 them, and then they'll review our work to make sure 14 that we're on the right track. Because we're not 15 the ones actually on the ground doing these things, 16 we want to make sure our changes and efforts help 17 our clerks. 18 Q. This specific clerk advisory committee is 19 for vote by mail. 20 What does that committee entail? 21 A. So it's -- it's kind of broken up into a few 22 subcommittees. It involves intelligent mail 23 barcodes, helping to implement that process. They 24 helped us to understand things like they were going 25 to need a third label to put that barcode on it.</p>
194	<p>1 now. And it's something that clerks who use our 2 labels will have access to. 3 Q. And it may be an obvious answer, but how is 4 this going to help with the upcoming elections? 5 A. In the absentee report, the April 7th 6 absentee report, we discussed a number of cases in 7 which we didn't have, the clerks didn't have, the 8 voters didn't have information about where their 9 ballot was, so be it they never received it or it 10 didn't make it back. And so this will help clerks 11 and voters certainly have more transparency as to 12 where their ballot is. So they can track it just 13 like they would anything else that's important that 14 they're transacting through the mail. 15 Q. Thank you. 16 MR. BROWNE: If we could turn to page 7 and 17 part F, I'm right at the top there. 18 Q. Ms. Wolfe, I think maybe you had mentioned 19 it in your last answer, clerk advisory committees. 20 Could you explain to us what a clerk 21 advisory committee is? 22 A. Sure. So because we have some local 23 election officials -- so this is not how most states 24 work, but we have 2,000 almost local election 25 officials -- we can't get them all into a room,</p>	196	<p>1 And let's see. We also have one where we worked on 2 that pending entity for MyVote absentee application. 3 So instead of a clerk getting an e-mail with an 4 application that comes from MyVote, we can place it 5 in a pending status in the WisVote system so they 6 can go in, review it, and approve or deny it rather 7 than having to data enter all that. 8 Basically, any project we have on here that 9 involves a clerk. Even the mailer and how we're 10 going to do the data entry when those absentee 11 requests come back and they're going to approve it, 12 all those things were conceptualized with the -- 13 (Inaudible.) 14 MR. BROWNE: If we could turn to page 8 and 15 part H, HAVA election security subgrant. 16 Q. Ms. Wolfe, just briefly summarize what is 17 the Commission planning with respect to providing 18 HAVA election security subgrants to municipalities? 19 A. Sure. So before April all we ever talked 20 about was security, and so this is one of our 21 security initiatives. So we also have a federal 22 grant -- well, two federal grants focused on 23 improving the cybersecurity posture of election. 24 And so this is a subgrant that was offered to 25 municipalities with our original round of federal</p>

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50 (197 to 200)

<p style="text-align: right;">197</p> <p>1 funding, and it was -- I'm really proud of this 2 program, but it was -- you know, because our state 3 is so rural and decentralized, most of our clerks, 4 1,200 of them are in townships. So they work, you 5 know, five hours a week for their township. Their 6 township doesn't have an office. They don't have a 7 computer. They certainly don't have IT support. 8 So this grant allowed us to ask the clerks 9 do you have a compliant computer. And we gave them 10 parameters and software on their devices so they 11 could help understand it because self-reporting 12 wasn't really going to work in a situation where you 13 had people that weren't comfortable with technology. 14 We helped them determine if they were compliant 15 device. If they didn't, they were eligible to get 16 \$600 to get a complaint device. And through the 17 state contracts, we could find some good computers 18 that they were able to use, spend that money on. 19 Same question about IT support. Do you have 20 IT support? And here's what we mean. Are you able 21 to keep your machine up-to-date? Are you able to 22 make sure you're getting patches and your backups 23 and all that? If they said no, they didn't have IT 24 support, then we would give them \$500 -- or \$600, I 25 believe, to get IT support. And we also worked</p>	<p style="text-align: right;">199</p> <p>1 impactful for these small jurisdictions, but they're 2 eligible to receive up to \$1,200 for those three 3 specific things. 4 Q. And do you know how much of this grant money 5 had been distributed by the Commission already? 6 A. I do not know this time around how many have 7 applied so far. I'm not sure. With the initial 8 round, there were over a thousand jurisdictions that 9 said they were in need of those three things, and we 10 were able to provide it to them. 11 Q. Staying on the same page and looking at part 12 I, if we could scroll down a little, changes to 13 MyVote, Ms. Wolfe, if you could just briefly 14 summarize, what is the Commission planning with 15 respect to changes to MyVote? 16 A. So changes to MyVote, again, MyVote is the 17 user interface. We've already made significant 18 changes to the workflow. Again, we do usability 19 studies with voters. So when we're going to make a 20 change -- it's been harder in COVID times, but we're 21 going to make a change to a user interface, we go 22 out and talk to voters all around the state. We 23 watch them use the technology prototype, and we can 24 adjust, of course, based on their feedback. So that 25 helps us to make sure we're, again, serving our</p>
<p style="text-align: right;">198</p> <p>1 through state procurement channels to find managed 2 service providers that would able to help them. 3 And then, finally, were they able to attend 4 a security training program, an in-person one. We 5 were doing all these scenario-based trainings. We 6 had done hundreds, if not thousands of them, around 7 the state. And it offered them a hundred dollars to 8 be able to travel -- again, many of them are 9 part-time -- to attend one of the security 10 trainings. 11 So we did the first round in 2019. And then 12 the Commission agreed to reopen the program because 13 we have a third of our clerks that turn over every 14 single year. That averages out to something like 12 15 new clerks a week. And so that allowed us to reopen 16 that program to clerks to make sure everybody has 17 compliant devices and IT support. 18 Q. Are all municipalities eligible for this? 19 A. Yes, but, you know, many of our larger 20 jurisdictions -- you know, they're not going to be 21 able to answer no, I don't have a computer, no, I 22 don't have IT support. So anybody that's in need. 23 Q. And how much money could each municipality 24 be given under these grants? 25 A. It sounds small, but it's really hugely</p>	<p style="text-align: right;">200</p> <p>1 customers. 2 And so with MyVote, with the increased 3 traffic to absentee, we've had to do a lot of 4 usability sessions and changes to make sure that 5 voters can understand and interact with the absentee 6 process, that they're given clear instructions, that 7 they're able to be successful if they come to our 8 site to do that or understand where they're at. 9 And, also, we've made changes to it to 10 incorporate those intelligent mail barcodes. So if 11 you're a voter that's requested your absentee, so 12 you can go get more or less realtime milestones as 13 to where your ballot is at in the process. 14 Q. Has that all been implemented already? 15 A. Looking at the report quickly, I believe so, 16 yes. Not to say we don't have some refinement to 17 continue to do, but yes. 18 Q. Sure. Thank you. 19 MR. BROWNE: If we could turn to page 9 and 20 part J, changes to WisVote. 21 Q. I think you might have talked a little bit 22 just a second ago about WisVote. 23 A. Yes. 24 Q. If you could summarize what the Commission 25 is planning with respect to changes to WisVote?</p>

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Transcript of Meagan Wolfe
Conducted on July 16, 2020

51 (201 to 204)

201	<p>1 A. So I think as we've touched on, it's mostly 2 to do with the absentee process, automating that so 3 that, you know, clerks who maybe in the past issued 4 a handful of ballots and they used a pen and actual 5 physical stamp to send out their absentees, now they 6 need a more automated process. 7 So working on creating those batches and 8 labels for them so that they can more easily track 9 what they're getting and what they're sending; 10 creating that pending entity with the MyVote system 11 so they don't have to do data entry when they get 12 e-mail applications through MyVote; that they can go 13 into the system, see the photo ID, see the 14 information, either approve or deny it. Things like 15 notification letters to the voter. So if a clerk 16 does go in and deny an application because of 17 insufficient photo ID, they can generate a letter 18 and they can track all of that. It's automated 19 instead of having to hand-key it in. 20 Yeah, the intelligent mail barcode part of 21 that label process. Building in our milestones for 22 that, so pulling in the USPS data in addition to, 23 sort of, tracking the clerk milestones is part of 24 that barcode as well. 25 And then just detection of issues is also</p>	203
202	<p>1 something we've been working on, too, is development 2 of reports and flagging of anomalies so that clerks 3 can identify if perhaps they've missed something. 4 So let's say they're dealing with a huge 5 volume of absentee requests and there's a certain 6 day where they don't start hitting the mail stream, 7 we can flag that data for them so they can go back 8 and take a look and maybe spot-check different 9 voters and see what's going on here, why haven't 10 these hit the mail stream yet, why hasn't anybody 11 that received a ballot on this day returned one, and 12 so that they can work to reissue ballots while 13 there's still time. And so we're working on a lot 14 of reports and quality control efforts to help aid 15 the clerks in identifying issues. 16 Q. Have all these changes been implemented 17 already? 18 A. Most of them have. I think we're still 19 continuing to grow that list every day, again, as we 20 get feedback from the clerks about things that are 21 working, things that still need some tweaking; but 22 yes, the basics are all in at least a beta phase. 23 MR. BROWNE: Turning to page 11, please, and 24 part L, poll worker recruitment training National 25 Guard assistance.</p>	204
201	<p>1 Q. Ms. Wolfe, if you could just briefly 2 summarize what is the Commission planning with 3 respect to poll worker recruitment training National 4 Guard assistance? 5 A. So we are going to continue to do what we 6 can through our channels to recruit poll workers, 7 again, working with our state decision makers to see 8 what we can do to support those efforts, encouraging 9 state employees, thing like that; but probably most 10 significantly is giving tools to the local election 11 officials, continuing to give them templates, press 12 releases, letters, social media that they can use to 13 try to recruit poll workers in their communities. 14 We've already developed the poll worker 15 training that they can use, which I think is really 16 helpful. The training that we used to the National 17 Guard in April, the clerks can use that. It's out 18 there, available. If they want to use that 19 curriculum to train their poll workers to supplement 20 their training or if they have a last-minute recruit 21 or a change, they're able to use our training to 22 have somebody take that training online if they 23 needed to. And so those efforts will continue. 24 We also have this widget on our website that 25 allows people to submit their interest of being a</p>	204
202	<p>1 poll worker and the clerks can then pull a report of 2 people who have indicated interest and their address 3 matches being in compliance being able to serve in 4 their jurisdiction. So we will continue on those 5 efforts. 6 You know, the National Guard can only be 7 deployed on the governor's orders. And the National 8 Guard has been just an amazing, amazing partner. 9 But they are here to serve our state in a case of 10 emergency and so we can't rely on them being poll 11 workers in August or November. We continue to have 12 a close relationship with them. We understand, sort 13 of, how that would work if the order was given, but 14 it's not a crutch that any of us should be putting 15 any weight on because we don't know if there's going 16 to be another crisis or emergency to respond to. 17 We're going to have to continue to focus our 18 efforts. 19 Q. It sounds like you've had a lot of 20 communication with municipalities about poll worker 21 recruitment training. 22 Have you had specific discussions with or 23 the Commission had specific discussions with the 24 City of Milwaukee about these things? 25 A. I'm not aware of any specific</p>	204

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Transcript of Meagan Wolfe
 Conducted on July 16, 2020

52 (205 to 208)

<p style="text-align: right;">205</p> <p>1 Milwaukee-related discussions. It's been more under 2 the guidance or best practices given to all the 3 jurisdictions. 4 Q. What about specific discussions with the 5 City of Green Bay? 6 A. The same. They would receive any guidance 7 that we put out for all jurisdictions. 8 MR. BROWNE: If you can turn to page 12. 9 MR. SCHWARTZTOL: Rob, can I interrupt just 10 one second before you continue? I'm going to have 11 about, I think, 90 seconds of questions to follow up 12 on some of your questions. And I know that 13 Ms. Wolfe and Dixon have a hard stop, so I just want 14 to see if I'm going to be able to get what I think 15 is 90 seconds' worth of follow-up questioning in. 16 MR. BROWNE: I could try, Larry. I'm moving 17 as fast as I can here. I've probably got about six 18 more minutes. I'll try to move. 19 MR. SCHWARTZTOL: Thank you. 20 MR. BROWNE: Okay. 21 BY MR. BROWNE: 22 Q. Voter outreach videos, guides, and surveys, 23 Ms. Wolfe, could you just briefly summarize what the 24 Commission is doing on that? 25 A. Sure. So as I believe we discussed earlier</p>	<p style="text-align: right;">207</p> <p>1 content. So, you know, trying to be good stewards 2 of Wisconsin taxpayer money, we want to make tools 3 that can be dynamic, that can be changed, because 4 there's more certain than that there will be change 5 in election and the requirements. And so all those 6 things we have to view through lines of if we have 7 to change that, how do we do that so it doesn't just 8 become -- (Inaudible.) 9 MR. BROWNE: If we could go to page 13, 10 public health guidance. 11 Q. Ms. Wolfe, if you could just briefly 12 generally summarize what is the Commission planning 13 with regard to public health guidance? 14 A. Sure. So we'll continue to work with public 15 health officials through the state emergency 16 operation center. We met with them yesterday to go 17 through our guidance as it, kind of, intersects 18 elections and public health to make sure that we're 19 giving the most current and accurate guidance. 20 We're not public health officials so we rely on them 21 to help us keep that current. So us keeping a 22 constant engagement to make sure documents are 23 accurate. So we've done that for the August 24 election, of course, with continued pulse on it. 25 Things change. We might need to supplement or</p>
<p style="text-align: right;">206</p> <p>1 today, you know, the Commission, as part of our 2 security initiatives -- but that definition can 3 shift depending on what's going on in the public 4 eye -- we've done surveys to understand where voters 5 go for information, what kind of information they 6 need. And then based on that, we start to put 7 together information to explain the mechanics of how 8 voting works. And, of course, right now people are 9 particularly interested in the security and the 10 mechanics of absentee voting, and so we've been 11 working to produce videos. I think I just did two 12 videos this week and there's one more in the hopper 13 that explain the mechanics of how to request an 14 absentee, what goes into securing them, how to 15 return them, all of these things. 16 And then also other materials that the 17 clerks can use to reach out to their public as well. 18 We did a communications guide with them earlier this 19 year. It gives them sort -- we always do a social 20 media plan for them to help them be able to 21 communicate these things with their voters as well. 22 So it's a work in progress. And I will also just 23 note that it's a tricky work in progress because you 24 never know when there might be another court ruling 25 in this case or other cases that impact that</p>	<p style="text-align: right;">208</p> <p>1 change something. And then we'll continue that 2 approach of working with them as we head into 3 November as well and creating any documents that we 4 need to that supplement new issues or new elements. 5 We also have a web page, so if you go to 6 elections.wi.gov, there's a COVID-19-specific page 7 where we index all that information. 8 Q. Last question, Ms. Wolfe, and I want to 9 thank you, at least on behalf of intervener 10 defendants, the legislature, for all of your time. 11 I know you've dedicated quite a bit of time to all 12 of these depositions. 13 Has the Commission had any specific 14 discussions with Milwaukee Elections Commission and 15 their preparations for the August and November 16 elections? 17 A. The Commission as a body, no. You know, 18 staff, I'm sure we've had communications with them, 19 and we will continue to do, just like we do with any 20 of our jurisdictions. But the Commission has not, I 21 don't believe, made any determination specific to 22 Milwaukee. 23 Q. And what were the communications that the 24 staff has had with Milwaukee Elections Commission? 25 A. I'm sure just like any -- again, we're not</p>

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209	<p>1 the decision makers. But if they were to ask us a</p> <p>2 question about how something works or to point them</p> <p>3 to guidance, we would always be happy to answer</p> <p>4 those questions. I don't have any specific recent</p> <p>5 contacts with them, but I'm sure, you know, they</p> <p>6 call with walking through a new process in WisVote</p> <p>7 or something like that, where we're glad to help</p> <p>8 them firsthand.</p> <p>9 Q. Thank you, Ms. Wolfe. That's all I have.</p> <p>10 MR. SCHWARTZTOL: Very quickly again just on</p> <p>11 behalf of the Swenson plaintiffs.</p> <p>12 FURTHER DIRECT EXAMINATION</p> <p>13 BY MR. SCHWARTZTOL:</p> <p>14 Q. I first want to join Mr. Brown in thanking</p> <p>15 you again for taking all the time you've taken. We</p> <p>16 know what a demanding job and crazy year this is.</p> <p>17 We are really grateful for it.</p> <p>18 In the course of preparing for today's</p> <p>19 30(b)(6) deposition, did you have any conversations</p> <p>20 with any of the attorneys representing the</p> <p>21 legislature?</p> <p>22 A. No.</p> <p>23 Q. Did you have any conversations with any of</p> <p>24 the attorneys representing the RNC?</p> <p>25 A. No.</p>	211
210	<p>1 MR. BROWNE: Larry, I'm going to interrupt.</p> <p>2 These questions, honestly, why would I contact</p> <p>3 somebody who's represented by counsel? That's</p> <p>4 ridiculous. So if that's -- if you're going to</p> <p>5 continue down that line of questioning, I'm going to</p> <p>6 object.</p> <p>7 BY MR. SCHWARTZTOL:</p> <p>8 Q. Ms. Wolfe, did you have conversations with</p> <p>9 any nonattorneys who were representatives of the</p> <p>10 legislature in the course of preparing for this</p> <p>11 depositions?</p> <p>12 A. No.</p> <p>13 Q. And same with the RNC, did you have any</p> <p>14 conversation with any nonattorney representatives of</p> <p>15 the RNC?</p> <p>16 A. No.</p> <p>17 MR. SCHWARTZTOL: Okay, thank you. That's</p> <p>18 all we have. Thank you again, Ms. Wolfe.</p> <p>19 MR. GAHNZ: If you want to go to your next</p> <p>20 Zoom meeting.</p> <p>21 THE WITNESS: Okay, thank you.</p> <p>22 VIDEO TECH: Before leaving, our court</p> <p>23 reporter is going to take some orders in case you</p> <p>24 need to place before going off the record.</p> <p>25 Tiffany?</p>	212

1 COURT REPORTER: Mr. Schwartztol, did you

2 need this tomorrow?

3 MR. SCHWARTZTOL: Yeah, we'll take the

4 rough, please, for tomorrow. Regular delivery on

5 the final.

6 MS. ROSENZWEIG: We don't need a transcript

7 at this point.

8 MR. BROWNE: I'll take a rough tonight if

9 you can do it. And I'd love the final tomorrow.

10 That would be great.

11 MR. GAHNZ: We don't need a transcript at

12 this point.

13 (Witness excused.)

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2

3 I, Tiffany M. Pietrzyk, CSR RPR CRR, the

4 officer before whom the foregoing deposition was

5 taken, do hereby certify that the foregoing

6 transcript is a true and correct record of the

7 testimony given; that said testimony was taken by me

8 stenographically and thereafter reduced to

9 typewriting under my direction; that reading and

10 signing was not discussed; and that I am neither

11 counsel for, related to, nor employed by any of the

12 parties to this case and have no interest, financial

13 or otherwise, in its outcome.

14

15 IN WITNESS WHEREOF, I have hereunto set my

16 hand and affixed my notarial seal this 17th day of

17 July, 2020.

18

19

20

21

22 

23 My commission expires:

24 February 28th, 2024

25

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Conducted on July 16, 2020

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A			
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