

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

No. 15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants;

and

THE WISCONSIN STATE ASSEMBLY,

Intervenor-Defendant.

**DECLARATION OF MARK P. GABER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO STRIKE PLAINTIFFS'
SUPPLEMENTAL DISCLOSURES**

I, Mark P. Gaber, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am one of the attorneys representing the Plaintiffs in the above-captioned action.

I make this Affidavit on personal knowledge of the facts and circumstances set forth herein.

2. Attached as Exhibit 1 is a true and correct copy of Plaintiff Michael Switzenbaum's Response to Defendants' First Set of Interrogatories and Document Production Requests, dated November 27, 2018.

3. Attached as Exhibit 2 is a true and correct copy of Plaintiff Elizabeth Lentini's Response to Defendants' First Set of Interrogatories and Document Production Requests, dated November 27, 2018.

4. Attached as Exhibit 3 is a true and correct copy of Plaintiff Ann E. Stevning-Roe's Response to Defendants' First Set of Interrogatories and Document Production Requests, dated November 27, 2018.

5. Attached as Exhibit 4 is a true and correct copy of Plaintiff Daniel Dieterich's Response to Defendants' First Set of Interrogatories and Document Production Requests, dated November 27, 2018.

6. Attached as Exhibit 5 is a true and correct copy of Plaintiff Roger Anclam's Response to Defendants' First Set of Interrogatories and Document Production Requests, dated November 27, 2018.

7. Attached as Exhibit 6 is a true and correct copy of Defendants' Expert Report of Sean P. Trende, dated December 17, 2018.

8. Attached as Exhibit 7 is a true and correct copy of an email from Intervenor-Defendant's counsel Adam Mortara to Plaintiffs' counsel, dated June 7, 2019.

Dated: June 10, 2019.

Respectfully submitted,

/s/ Mark P. Gaber
Mark P. Gaber

Exhibit 1

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

WILLIAM WHITFORD, et al.,
Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,
Defendants.

THE WISCONSIN ASSEMBLY
DEMOCRATIC CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,
Defendants.

**PLAINTIFF MICHAEL SWITZENBAUM'S RESPONSE TO DEFENDANTS' FIRST
SET OF INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Plaintiff Michael Switzenbaum ("Plaintiff"), a plaintiff in *Whitford, et al. v. Gill, et al.*, No. 15-cv-421-jdp, by and through his attorneys, responds as follows to Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiff (the "Requests"):

GENERAL RESPONSES AND OBJECTIONS

1. Plaintiff objects to the Requests to the extent that any one or more of the Requests place obligations on Plaintiff that exceed the requirements of the Federal Rules of Civil Procedure and other applicable law.

2. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production of documents or information that are subject to the attorney-client privilege,

work product doctrine, protections for experts employed only for trial preparation, or any other applicable privilege, protection, or immunity from discovery.

3. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information that is not relevant to the claims or defenses asserted in this litigation, or that is unlikely to lead to the discovery of admissible evidence.

4. Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks information protected by the associational privilege guaranteed by the First and Fourteenth Amendments to the Constitution of the United States, which protects people's right to associate for political, religious, and other reasons without fear of compelled disclosure of those associations. *See, e.g., NAACP v. Ala. ex rel. Patterson*, 357 U.S. 449, 460-61 (1958). The Supreme Court has recognized that such "compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . effective . . . restraint on freedom of association." *Id.* at 462. Plaintiff further objects to the Requests to the extent that any one or more of the Requests seeks to compel the disclosure of contributions to and expenditures by Plaintiff, as such information is protected by the First Amendment. *Brown v. Socialist Workers '74 Campaign Committee*, 459 U.S. 87, 98-99 (1982). Finally, Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks to identify the author or speaker of anonymous political speech that is also protected by the First Amendment. *See McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 342-43 (1995).

5. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production or disclosure of Plaintiff's personal information that is sensitive or protected by state or federal law, of individuals, without an appropriate protective order in place.

6. Plaintiff objects to the Requests to the extent that any one or more of the Requests is overly broad, unduly burdensome, vague, ambiguous, or confusing. The Federal Rules of Civil

Procedure do not predicate the ability to seek vindication of important rights upon the ability of such plaintiffs to devote enormous amounts of time to finding and reviewing, for the purpose of responding to interrogatories, materials which are “not reasonably accessible due to undue burden or cost.” Fed. R. Civ. P. 26(b)(2)(B). Plaintiff further objects to the Requests to the extent that any one or more of the Requests requires speculation to determine its meaning or imprecisely describes the information sought.

7. Plaintiff objects to the Requests as unduly burdensome to the extent that any one or more of the Requests seeks information that is a matter of public record, is not in Plaintiff’s possession, custody, or control, is already in one or more Defendants’ possession, custody, or control, or is otherwise readily available to one or more Defendants.

8. Plaintiff objects to any one or more of the Requests that fails to specify a relevant period of time. Because the individual Plaintiffs have extensive histories of voting and/or being involved with grassroots organizing and elections in Wisconsin, a Request without a time limitation is overly broad and unduly burdensome.

9. If Plaintiff objects to a particular Request, either through these General Responses and Objections or through a specific objection raised below, but nevertheless responds to the Request in whole or in part, Plaintiff answers subject to and without waiving the specific or General Responses and Objections.

10. Plaintiff reserves the right to object to the admissibility of any information contained in his Responses to the Requests.

11. Plaintiff reserves the right to supplement his answers to all Requests.

INTERROGATORIES

Subject to and without waiving the General Responses and Objections above, Plaintiff responses to Defendants’ Interrogatories as follows:

INTERROGATORY NO. 1

Please state the date that you began living in your current residence.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- July 2003

INTERROGATORY NO. 2

For each Wisconsin State Assembly general election since 2002 for which you have lived at your current residence, please state the name and political affiliation of the candidate for whom you voted. If you did not vote in an election, please state as much.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2002: Did not live at current address
- 2004: Sheldon Wasserman (D)
- 2006: Sheldon Wasserman (D)
- 2008: Sandy Pasch (D)
- 2010: Sandy Pasch (D)
- 2012: Chris Rogers (D)
- 2014: Beth Lueck (D)
- 2016: I voted in this general election, but left the state assembly candidate office blank because the Republican candidate was running unopposed, and I did not support the Republican candidate.
- 2018: Liz Sumner (D)

INTERROGATORY NO. 3

Identify any candidates for a partisan political office for whom you have voted in the last ten years who was not a Democrat, including the office for which that candidate was running and the year in which the election occurred.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- None.

INTERROGATORY NO. 4

Please describe any political parties or other political organizations of which you are a member, including the name of the organization or party and the date you became a member.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Grassroots North Shore - February, 2016

INTERROGATORY NO. 5

Please state whether you have run for partisan political office. If so, please state (a) the office for which you ran; (b) the date of the election; and (c) the outcome of the election.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff has never run for partisan political office.

INTERROGATORY NO. 6

Please describe any donations to candidates for political office, political parties, political action committees, or any other partisan political organization you have made since 2002, including (a) to whom you made the donation; (b) the amount of the donation; and (c) the date you made the donation.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 1, 4, and 6.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff's spouse, Gail Schumann, writes all the political contribution checks on behalf of herself and Plaintiff from their joint checking account. See attached Exhibits A - I, which includes documents containing Plaintiffs' donations since 2002. These list to whom the donation was made, the amount of the donation, and the date of the donation.
- Note that in Exhibit B the employer for Gail Schumann is listed as Marquette but she retired on December 31, 2012. Thus, any dates listing her employment with Marquette after that date are incorrect.

INTERROGATORY NO. 7

Please describe any other political activity, including volunteering for political campaigns, you have engaged in since 2002, including (a) the nature of the activity; and (b) the date on which you engaged in the activity.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Canvassing for Move On – Fall, 2004
- Collected signatures for Committee to Recall Alberta Darling – Winter, 2011
- Phone calls and office work for the Democratic Party of Wisconsin – Summer/Fall of 2016
- Volunteered at the Democratic Party Booth at the Wisconsin State Fair – 2015, 2016, and 2018

INTERROGATORY NO. 8

Identify the people and/or groups with whom you want to associate but are allegedly burdened in doing so by Act 43.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Generally, other Democrats in my assembly district, region, and across the state of Wisconsin.

INTERROGATORY NO. 9

Please describe all the ways that act 43 has allegedly impaired “your ability to affiliate with like-minded Democrats and to pursue Democratic associational goals has been impaired by the Current Plan.”

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Response to Interrogatory No. 8. Generally, the Current Plan intentionally discriminates against me because I am a Democrat, disadvantaging myself, Democrats across the state, and the party I support in advocating and implementing preferred policies and achieving various associational goals.
- It has limited my contributions as well as the activities for my Democratic State Assembly and State Senate Candidates as I felt like their campaigns were hopeless. We directed our donations and activities to other offices. We also felt funny trying to convince anyone else to vote for a candidate with no chance.

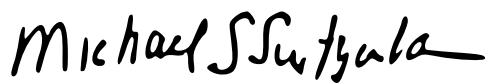
INTERROGATORY NO. 10

Please describe all the ways in which Act 43 has, as alleged in paragraph 176 of your amended complaint, deterred you or hindered you from “turning out to vote, registering voters, volunteering for campaigns, donation money to candidates, running for office, appealing to independents, and advocating and implementing their preferred policies.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Responses to Interrogatories Nos. 8 and 9.

As to Answers to Interrogatories, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2018.



Michael Switzenbaum

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

All documents you used in preparing responses to the Interrogatories above.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 2, 4, and 5.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A – I for information on Plaintiff’s political contributions, as well as Exhibit J for Plaintiff’s voter history document from the Wisconsin Election Commission’s “My Vote” website.
- Plaintiff also received and reviewed a copy of the Amended Complaint in preparing answers to the above Interrogatories.
- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

REQUEST FOR PRODUCTION NO. 2

All documents you intend to use at trial in support of your claims.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

Respectfully submitted, this 27th day of November, 2018.

As to Objections and Responses to Production Requests,

/s/ Douglas M. Poland
Douglas M. Poland
State Bar No. 1055189
Alison E. Stites
State Bar. No. 1104819
RATHJE WOODWARD, LLC
10 East Doty St., Ste. 507
Madison, WI 53703
(608) 960-7430
dpoland@rathjewoodward.com
astites@rathjewoodward.com

/s/ Ruth M. Greenwood
Ruth M. Greenwood
Annabelle E. Harless
CAMPAIGN LEGAL CENTER
73 W. Monroe St., Ste. 302
Chicago, IL 60603
(312) 561-5508
rgreenwood@campaignlegalcenter.org
aharless@campaignlegalcenter.org

Attorneys for Plaintiffs

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(Plaintiff's Political Donations – Wisconsin Campaign Finance System)



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|--|---|---|---|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name <input type="text" value="schumann"/> | First Name <input type="text" value="gail"/> |
| Filing Year | Filing Period Name All Filing Periods | Occupation Title <input type="text"/> | Committee ID <input type="text"/> |
| Office | District/County | Branch | |
| Date Range <input type="text"/> To <input type="text"/> | Amount Range (\$) <input type="text"/> - <input type="text"/> <input type="checkbox"/> Out of State Receipts | Receiving Registrant <input type="checkbox"/> Segregated Fund | |

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| Transaction Date | Filing Period Name | Contributor Name | Contribution Amount | Address Line1 | Address Line2 | City | State | Zip | Occupation Title | Employer Name | Employer Address | Contributor Type | Receiving Committee | Committee ID | Conduit | Office (Including Branch) | Comments | Segregated Fund Flag | 72 Hr. Reports |
|------------------|------------------------|------------------|---------------------|----------------------|---------------|---------------|-------|-------|------------------|---------------|------------------|------------------|---------------------------|--------------|---------|---------------------------------|----------|----------------------|----------------|
| 09/30/2018 | Fall Pre-Election 2018 | Schumann Gail | \$250.00 | 4907 N. Idlewild Ave | | Whitefish Bay | WI | 53217 | NONE | | | Individual | Alyson for Wisconsin | 0106040 | | State Assembly, District No. 85 | | False | |
| 08/19/2018 | September Report 2018 | Schumann Gail L | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NONE | | | Individual | Kaul for Attorney General | 0105879 | | Attorney General | | False | |
| 08/15/2018 | September Report 2018 | Schumann Gail | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Tony for Wisconsin | 0103465 | | Governor | | False | |
| 08/15/2018 | September Report 2018 | Schumann Gail L | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NONE | | | Individual | Mandela for Wisconsin | 0105266 | | Lieutenant Governor | | False | |
| 07/20/2018 | Fall Pre-Primary 2018 | Schumann Gail L | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | PROFESSOR | | | Individual | Friends of Kelda Roys | 0104606 | | Governor | | False | |
| 07/15/2018 | Fall Pre-Primary 2018 | Schumann Gail L | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Kaul for Attorney General | 0105879 | | Attorney General | | False | |
| 07/26/2018 | Fall Pre-Primary 2018 | Schumann Gail | \$250.00 | 4907 N. Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Kapsner for Senate | 0105988 | | State Senate, District No. 23 | | False | |
| 03/18/2018 | July Continuing 2018 | Schumann Gail L | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Kaul for Attorney General | 0105879 | | Attorney General | | False | |
| 05/17/2018 | July Continuing 2018 | Schumann Gail L | \$30.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Grassroots North Shore | 0501298 | | | | False | |



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| Date | Event Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Service | Branch) | Comments | Flag | Reports |
|------------|--|---------------|----------|----------------------|-------|---------------|-------|------------|--------------|--------------|---------|------------|------------------------------|---------|---------|------------------------------------|----------|-------|---------|
| 03/02/2018 | Spring Pre-Election 2018 | Schumann Gail | \$250.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | RETIRED | | | Individual | Dallet for Justice | 0104609 | | Supreme Court | | False | |
| 02/09/2017 | July Continuing 2017 | Schumann Gail | \$50.00 | 4907 N Idlewild | | Whitefish Bay | WI | 53217 | | | | Individual | Grassroots North Shore | 0501298 | | | | False | |
| 06/30/2017 | July Continuing 2017 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | State Senate Democratic Comm | 0400003 | | | | False | |
| 10/20/2016 | Fall Pre-Election 2016 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | PROFESSOR | | | Individual | Mandy Wright for Assembly | 0105227 | | State Assembly, District No. 85 | | False | |
| 07/28/2016 | September Report 2016 | Schumann Gail | \$200.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Citizens for Chisholm | 0104433 | | Milwaukee County District Attorney | | False | |
| 03/08/2016 | July Continuing 2016 | Schumann Gail | \$30.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Grassroots North Shore | 0501298 | | | | False | |
| 06/13/2016 | July Continuing 2016 | Schumann Gail | \$100.00 | 4907 N. Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Citizens for Chisholm | 0104433 | | Milwaukee County District Attorney | | False | |
| 02/11/2016 | Spring Pre-Election 2016 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | Not employed | | Individual | Friends of Chris Larson | 0104991 | | State Senate, District No. 07 | | False | |
| 03/30/2015 | July Continuing 2015 | Schumann Gail | \$25.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | NOT EMPLOYED | | | Individual | Grassroots North Shore | 0501298 | | | | False | |
| 03/21/2015 | Spring Pre-Election 2015 (/ 20th Senate Special) | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Bradley for Justice | 0102050 | | Supreme Court | | False | |
| 03/17/2014 | July Continuing 2014 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Burke for Wisconsin | 0105459 | | Governor | | False | |
| 04/16/2014 | July Continuing 2014 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Citizens for Richards | 0103633 | | Attorney General | | False | |
| 06/30/2012 | July Continuing 2012 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217-5969 | | | | Individual | Friends of Sandy Pasch | 0104577 | | State Assembly, District No. 10 | | False | |



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| Date | Event Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Source | Branch | Comments | Flag | Reports |
|------------|--------------------------|---------------|----------|----------------------|-------|---------------|-------|-------|-------|------|---------|------------|--------------------------|---------|-------------------|---|----------|-------|---------|
| 02/22/2012 | Spring Pre-Election 2012 | Schumann Gail | \$100.00 | 4907 N Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Carolina Stark for Judge | 0105181 | | Milwaukee County Circuit Court, Branch 17 | | False | |
| 06/12/2011 | July Continuing 2011 | Schumann Gail | \$11.11 | 4907 N. Idlewild Ave | | Whitefish Bay | WI | 53217 | | | | Individual | Friends of Dave Hansen | 0103835 | ActBlue Wisconsin | State Senate, District No. 30 | | False | |
| 06/12/2011 | July Continuing 2011 | Schumann Gail | \$11.11 | 4907 N. Idlewild Ave | WI | Whitefish Bay | | 53217 | | | | Individual | Holperin - Senate | 0101410 | ActBlue Wisconsin | State Senate, District No. 12 | | False | |

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| | | | |
|----------------------|--|--|-----------------------------------|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="schumann"/> | <input type="text" value="gail"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
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| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

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| Transaction Date | Filing Period Name | Contrib Name | Contrib Amount | Address Line1 | Address Line2 | City | State | Zip | Occup Title | Employ Name | Employ Address | Contrib Type | Receiving Committee | Comm ID | Condui | Office (Includ Branch | Comm | Segreg Fund Flag | 72 Hr. Report |
|------------------|--------------------|--------------|----------------|---------------------|---------------|------------|-------|-------|-------------|-------------|----------------|--------------|-----------------------------|---------|---------------|------------------------------|------|------------------|---------------|
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Friends of Robert W. Wirsch | 01028 | ActBlu Wiscor | State Senate District No. 22 | | False | |
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Shilling for Senate | 01038 | ActBlu Wiscor | State Senate District No. 32 | | False | |

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| Date | Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Party | Branch | County | Flag | Report |
|------------|------------------|-------------|----------|---------------------|-------|------------|-------|-------|-------|---------------|---|---------|-------------------------|-------|---------------|------------------------------|--------|-------|--------|
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Friends of Jessica King | 01046 | ActBlu Wiscor | State Senate District No. 18 | | False | |
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Clark for Wisconsin | 01046 | ActBlu Wiscor | State Assem District No. 81 | | False | |
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Moore for Senate | 01051 | ActBlu Wiscor | State Senate District No. 10 | | False | |
| 06/13/2011 | July Contin 2011 | Schurr Gail | \$11.12 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | PROFE | Marque Univer | 4907 N Idlewil Ave, Whitef Bay, WI 53217-5969 | Individ | Friends of Sandy Pasch | 01045 | | State Assem District No. 10 | | False | |
| 06/07/2011 | July Contin 2011 | Schurr Gail | \$100.00 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | PROFE | Marque Univer | 4907 N Idlewil Ave, Whitef Bay, WI 53217-5969 | Individ | Friends of Sandy Pasch | 01045 | | State Assem District No. 10 | | False | |
| 06/12/2011 | July Contin 2011 | Schurr Gail | \$11.11 | 4907 N. Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Nusbaum for Senate | 01039 | ActBlu Wiscor | State Senate District No. 02 | | False | |

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| Date | Cont | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch | Flag | Report |
|------------|---------------------------------|---------------------|----------|-----------------------------|-------|---------------|-------|-------|-------|------------------|---|---------|--------------------------|-------|--------|-------|--------|
| 10/29/2010 | Januar Conti 2011 | Schurr Gail L | \$200.00 | 4907 N Idlewil Ave | | Whitef Bay | WI | 53217 | FACUL | Marque Univer | 530 N Wiscor Ave, Janesv WI 53546 | Individ | Barrett for Wisconsin | 01014 | Govern | False | |
| 09/22/2010 | Fall Pre- Electio 2010 | Schurr Gail L | \$250.00 | 4907 N Idlewil Ave | | Whitef Bay | WI | 53217 | FACUL | Marque Univer | 530 N Wiscor Ave, Milwau WI 53233 | Individ | Barrett for Wisconsin | 01014 | Govern | False | |
| 03/15/2010 | July Conti 2010 | Schurr Gail L | \$100.00 | 4907 N Idlewil Ave | | Whitef Bay | WI | 53217 | | | | Individ | Barrett for Wisconsin | 01014 | Govern | False | |

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Exhibit B

(Plaintiff's Political Donations – Wisconsin Democracy Campaign)

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Contributions to ALL State Candidates

Advanced Search

Contribution Date:

TO:

Contributor Last Name:

Candidate Last Name:

Employer:

Interest Category:

City, State, Zip

| | | |
|-----------------------------------|---------------------------------|------------------------------------|
| <input type="text" value="City"/> | <input type="text" value="WI"/> | <input type="text" value="53217"/> |
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Start Amount:

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Search

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27 Contribution(s) Found - **Total Amount Contributed: \$3,483.36**

100 ▾

| Date ▾ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|---------------|-----------------------------------|-------------------------|--------------------------|----------------------|--------------------------|---------------|
| 03/02/2018 | Dallet, Rebecca Frank | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$250.00 |
| 03/02/2018 | Dallet, Rebecca Frank | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$250.00 |
| 06/30/2017 | State Senate Democratic Committee | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 06/30/2017 | State Senate Democratic Committee | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 10/20/2016 | Wright, Mandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 10/20/2016 | Wright, Mandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |

| Date ▼ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|---------------|-----------------------|-------------------------|--------------------------|----------------------|--------------------------|---------------|
| 03/21/2015 | Bradley, Ann Walsh | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 03/21/2015 | Bradley, Ann Walsh | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 04/16/2014 | Richards, Jon | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 03/17/2014 | Burke, Mary | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 06/30/2012 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 06/13/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$11.12 |
| 06/13/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$11.12 |
| 06/13/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$11.12 |
| 06/07/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |

| Date ▼ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|---------------|-----------------------|-------------------------|--------------------------|----------------------|--------------------------|---------------|
| 06/07/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 06/07/2011 | Pasch, Sandy | Schumann, Gail | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 10/29/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$200.00 |
| 10/29/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$200.00 |
| 10/29/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$200.00 |
| 09/22/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$250.00 |
| 09/22/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$250.00 |
| 09/22/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$250.00 |
| 03/15/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |

| Date ▼ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|---------------|-----------------------|-------------------------|--------------------------|------------------------|--------------------------|---------------|
| 03/15/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 03/15/2010 | Barrett, Tom | Schumann, Gail L | Whitefish Bay, WI, 53217 | Marquette University | Education | \$100.00 |
| 10/04/2006 | Doyle, Jim | Schumann, Gail | Whitefish Bay, WI, 53217 | No Employer Identified | Unknown | \$100.00 |

Jump to page

JOIN THE DEMOCRACY CAMPAIGN

Wisconsin Democracy Campaign



203 South Paterson Street, Suite 100

Madison, WI 53703

Phone 608.255.4260

Fax 608.255.4359

wisdc@wisdc.org

Wisconsin Democracy Campaign is working for a real democracy that allows the common good to prevail over narrow interests. We track the money in state politics and fight for campaign finance and other democracy reforms. WDC is a tax-exempt 501(c)(3) nonprofit organization, and charitable contributions supporting our work are fully tax deductible when you itemize.

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Social Media



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Exhibit C**(Plaintiff's Political Donations – Federal Election Commission 2007-08)**

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 9 filtered results for: [Clear all filters](#)

01/01/2007

-

12/31/2008

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|------------------|----------------------------------|-------|----------------------|--------------|----------|
| SCHUMANN, GAIL | <u>FEINGOLD SENATE COMMITTEE</u> | WI | MARQUETTE UNIVERSITY | 10/14/2008 | \$250.00 |
| SCHUMANN, GAIL | <u>OBAMA FOR AMERICA</u> | WI | MARQUETTE UNIVERSITY | 09/19/2008 | \$50.75 |
| SCHUMANN, GAIL | <u>OBAMA FOR AMERICA</u> | WI | MARQUETTE UNIVERSITY | 09/19/2008 | \$39.80 |
| SCHUMANN, GAIL | <u>FEINGOLD SENATE COMMITTEE</u> | WI | MARQUETTE UNIVERSITY | 07/16/2008 | \$250.00 |
| SCHUMANN, GAIL | <u>OBAMA FOR AMERICA</u> | WI | MARQUETTE UNIVERSITY | 06/30/2008 | \$100.00 |
| SCHUMANN, GAIL | <u>FEINGOLD SENATE COMMITTEE</u> | WI | MARQUETTE UNIVERSITY | 05/30/2008 | \$110.00 |
| SCHUMANN, GAIL | <u>OBAMA FOR AMERICA</u> | WI | MARQUETTE UNIVERSITY | 02/20/2008 | \$120.00 |
| | | WI | | 02/08/2008 | \$110.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-------------------|------------------------------|-------|-------------------------|--------------|----------|
| SCHUMANN, GAIL | FEINGOLD SENATE COMMITTEE | | MARQUETTE UNIVERSITY | | |
| SCHUMANN, GAIL | OBAMA FOR AMERICA | WI | MARQUETTE UNIVERSITY | 02/06/2008 | \$100.00 |

Results per page:

Exhibit D**(Plaintiff's Political Donations – Federal Election Commission 2009-10)**

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about 4 filtered results for: [Clear all filters](#)

01/01/2009

-

12/31/2010

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|---------------------|------------------------------|-------|-------------------------|--------------|----------|
| SCHUMANN, GAIL L | FEINGOLD SENATE COMMITTEE | WI | MARQUETTE UNIVERSITY | 10/29/2010 | \$200.00 |
| SCHUMANN, GAIL L | FEINGOLD SENATE COMMITTEE | WI | MARQUETTE UNIVERSITY | 09/10/2010 | \$500.00 |
| SCHUMANN, GAIL | FEINGOLD SENATE COMMITTEE | WI | MARQUETTE UNIVERSITY | 01/13/2010 | \$250.00 |
| SCHUMANN, GAIL | FEINGOLD SENATE COMMITTEE | WI | MARQUETTE UNIVERSITY | 07/23/2009 | \$500.00 |

Results per page:

100

Exhibit E

(Plaintiff's Political Donations – Federal Election Commission 2011-12)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about 4 filtered results for: [Clear all filters](#)

01/01/2011

- 12/31/2012

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|------------------|--|-------|----------------------|--------------|----------|
| SCHUMANN, GAIL | OBAMA FOR AMERICA | WI | MARQUETTE UNIVERSITY | 09/18/2012 | \$250.00 |
| SCHUMANN, GAIL L | TAMMY BALDWIN FOR SENATE | WI | MARQUETTE UNIVERSITY | 06/29/2012 | \$250.00 |
| SCHUMANN, GAIL L | TAMMY BALDWIN FOR SENATE | WI | MARQUETTE UNIVERSITY | 11/08/2011 | \$250.00 |
| SCHUMANN, GAIL L | PROGRESSIVES UNITED POLITICAL ACTION COMMITTEE | WI | MARQUETTE UNIVERSITY | 02/18/2011 | \$500.00 |

Results per page:

Exhibit F

(Plaintiff's Political Donations – Federal Election Commission 2013-14)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 2 filtered results for: [Clear all filters](#)

01/01/2013

-

12/31/2014

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|------------------|----------------|-------|--------------|--------------|----------|
| SCHUMANN, GAIL | <u>ACTBLUE</u> | WI | NOT EMPLOYED | 07/04/2014 | \$100.00 |
| SCHUMANN, GAIL | <u>ACTBLUE</u> | WI | NOT EMPLOYED | 07/04/2014 | \$10.00 |

Results per page:

Exhibit G (Plaintiff's Political Donations – Federal Election Commission 2015-16)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about **7** filtered results for: [Clear all filters](#)

01/01/2015

-

12/31/2016

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------|------------------------------------|-------|--------------|--------------|----------|
| SCHUMANN, GAIL MS. | EMILY'S LIST | WI | NOT-EMPLOYED | 05/09/2016 | \$500.00 |
| SCHUMANN, GAIL | ACTBLUE | WI | NOT EMPLOYED | 05/02/2016 | \$25.00 |
| SCHUMANN, GAIL L | RUSS FOR WISCONSIN | WI | RETIRED | 05/02/2016 | \$500.00 |
| SCHUMANN, GAIL L | RUSS FOR WISCONSIN | WI | RETIRED | 04/15/2016 | \$250.00 |
| SCHUMANN, GAIL L | RUSS FOR WISCONSIN | WI | NOT EMPLOYED | 08/17/2015 | \$625.00 |
| SCHUMANN, GAIL L | RUSS FOR WISCONSIN | WI | NOT EMPLOYED | 05/15/2015 | \$250.00 |
| SCHUMANN, GAIL | ACTBLUE | WI | NOT EMPLOYED | 05/14/2015 | \$10.00 |

Results per page:

Exhibit H (Plaintiff's Political Donations – Federal Election Commission 2017-18)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about 8 filtered results for: [Clear all filters](#)

01/01/2017

-

11/01/2018

Wisconsin

"Schumann, Gail"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------|-------------------------------------|-------|------------------|--------------|------------|
| SCHUMANN, GAIL | <u>ACTBLUE</u> | WI | NONE | 07/09/2018 | \$10.00 |
| SCHUMANN, GAIL L | <u>TAMMY BALDWIN FOR SENATE</u> | WI | N/A | 07/09/2018 | \$250.00 |
| SCHUMANN, GAIL MS. | <u>EMILY'S LIST</u> | WI | NOT- EMPLOYED | 03/12/2018 | \$500.00 |
| SCHUMANN, GAIL L | <u>TAMMY BALDWIN FOR SENATE</u> | WI | N/A | 02/18/2018 | \$500.00 |
| SCHUMANN, GAIL | <u>ACTBLUE</u> | WI | NONE | 02/17/2018 | \$10.00 |
| SCHUMANN, GAIL | <u>ACTBLUE</u> | WI | NONE | 06/30/2017 | \$10.00 |
| SCHUMANN, GAIL | <u>DSCC</u> | WI | NONE | 06/30/2017 | \$250.00 |
| | <u>EMILY'S LIST</u> | WI | | 02/06/2017 | \$1,000.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------|-----------|-------|------------------|--------------|--------|
| SCHUMANN, GAIL MS. | | | NOT- EMPLOYED | | |

Results per page:

100

Exhibit I
(Plaintiff's Political Donations – OpenSecrets)

Donor Lookup

Advanced Search

| | |
|------------------------------|---|
| First and Last Name of Donor |  |
|------------------------------|---|

Displaying records **1 - 22** of 22.

(Note: We only display the first 500 records. Need more? Please contact us requests@crp.org.)

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| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|--|-------------------------|----------------|----------|--|
| Money to Candidates | SCHUMANN, GAIL MILWAUKEE, WI 53217 | MARQUETTE UNIVERSITY | 07-23- 2009 | \$500.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL MILWAUKEE, WI 53217 | MARQUETTE UNIVERSITY | 07-16- 2008 | \$250.00 | Feingold, Russ (D) |
| Money to Parties | SCHUMANN, GAIL WHITEFISH BAY, WI 53217 | N/A | 06-30- 2017 | \$250.00 | Democratic Senatorial Campaign Cmte (D) |
| Money to Candidates | SCHUMANN, GAIL WHITEFISH BAY, WI 53217 | MARQUETTE UNIVERSITY | 09-18- 2012 | \$250.00 | Obama, Barack (D) |
| Money to PACs | SCHUMANN, GAIL MILWAUKEE, WI 53217 | NOT EMPLOYED | 05-02- 2016 | \$25.00 | ActBlue |
| Money to Candidates | SCHUMANN, GAIL WHITEFISH BAY, WI 53217 | MARQUETTE UNIVERSITY | 01-13- 2010 | \$250.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL MILWAUKEE, WI 53217 | NOT EMPLOYED | 05-02- 2016 | \$500.00 | Feingold, Russ (D) |

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|--|-------------------------|----------------|----------|-------------------------|
| Money to Candidates | SCHUMANN, GAIL MILWAUKEE, WI 53217 | MARQUETTE UNIVERSITY | 10-14- 2008 | \$250.00 | Feingold, Russ (D) |
| Money to PACs | SCHUMANN, GAIL L WHITEFISH BAY, WI 53217 | MARQUETTE UNIVERSITY | 02-18- 2011 | \$500.00 | Progressives United PAC |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53217 | NOT EMPLOYED | 08-17- 2015 | \$625.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53217 | MARQUETTE UNIVERSITY | 11-08- 2011 | \$250.00 | Baldwin, Tammy (D) |
| Money to Candidates | SCHUMANN, GAIL L WHITEFISH BAY, WI 53217 | NOT EMPLOYED | 07-09- 2018 | \$250.00 | Baldwin, Tammy (D) |

FEDERAL LAW PROHIBITS THE USE OF CONTRIBUTOR INFORMATION FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR ANY COMMERCIAL PURPOSE.

| | | | | | |
|---------------------|--|-------------------------|----------------|------------|--------------------|
| Money to PACs | SCHUMANN, GAIL MS MILWAUKEE, WI 53217 | NOT-EMPLOYED | 02-06- 2017 | \$1,000.00 | EMILY's List |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53217 | MARQUETTE UNIVERSITY | 06-29- 2012 | \$250.00 | Baldwin, Tammy (D) |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53211 | RETIRED | 05-02- 2016 | \$500.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53211 | RETIRED | 04-15- 2016 | \$250.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL L WHITEFISH BAY, WI 53217 | MARQUETTE UNIVERSITY | 10-29- 2010 | \$200.00 | Feingold, Russ (D) |
| Money to Candidates | SCHUMANN, GAIL L WHITEFISH BAY, WI 53217 | MARQUETTE UNIVERSITY | 09-10- 2010 | \$500.00 | Feingold, Russ (D) |
| Money to PACs | | NOT-EMPLOYED | | \$500.00 | EMILY's List |

| Category | Contributor | Occupation | Date | Amount | Recipient |
|------------------------|--|--------------|----------------|----------|--------------------|
| | SCHUMANN, GAIL MS MILWAUKEE, WI 53217 | | 03-12- 2018 | | |
| Money to Candidates | SCHUMANN, GAIL L WHITEFISH BAY, WI 53217 | NOT EMPLOYED | 02-18- 2018 | \$500.00 | Baldwin, Tammy (D) |
| Money to PACs | SCHUMANN, GAIL MS MILWAUKEE, WI 53217 | NOT-EMPLOYED | 05-09- 2016 | \$500.00 | EMILY's List |
| Money to Candidates | SCHUMANN, GAIL L MILWAUKEE, WI 53217 | NOT EMPLOYED | 05-15- 2015 | \$250.00 | Feingold, Russ (D) |

* Data on individual contributions downloaded from the Federal Election Commission on October 31, 2018. **Federal law prohibits the use of contributor information for the purpose of soliciting contributions or for any commercial purpose.** This database includes Federal Election Commission records of receipts from all individuals who contribute at least \$200 (smaller contributions are not part of the public record). Bear in mind that contributions to politicians can also be made through **Political Action Committees**.

We follow the money. You make it possible.

Select an amount to make a donation.

\$25

\$50

\$100

Other

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Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

SIGN UP



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Exhibit J

(Plaintiff's Voter History 2006-2018)



Military & Overseas Voters

🔍 Name

🔍 Address

MY VOTER INFORMATION

Switzenbaum, Michael S

Status: You are Registered to Vote!

Update Name

Current Address: 4907 N Idlewild Ave , Whitefish Bay, WI 53217-5969

Update Address

Register to Vote

If you are a military voter, you do not need to register. Click here to get an [absentee ballot](#)

MY NEXT ELECTION

2019 Spring Election

My Voter Information
Tuesday, April 2, 2019



Polling Place:

Lydell Recreation Center
5205 N Lydell Ave, Whitefish Bay, WI 53217-5002

Hours:

7.00 AM - 8.00 PM

[More Information](#)

Village Of Whitefish Bay - Ward 9

**If you were issued a provisional ballot on Election Day,
please check your voting activity below to see more
information about your provisional ballot.**

**Would you like to request an absentee ballot for this
election?**

Request A Ballot

Can't make it to the polls due to age, hospitalization or disability?

[Request an absentee ballot for all elections](#)

MY VOTING ACTIVITY

Aug 14, 2018 - 2018 Partisan Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Apr 3, 2018 - 2018 Spring Election

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 20, 2018 - 2018 Spring Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 4, 2017 - 2017 Spring Election

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Feb 21, 2017 - 2017 Spring Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Nov 8, 2016 - 2016 General Election

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Aug 9, 2016 - 2016 Partisan Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 5, 2016 - 2016 Spring Election and Presidential Preference Vote

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 16, 2016 - 2016 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 7, 2015 - 2015 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 4, 2014 - 2014 GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center 2012, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Aug 12, 2014 - 2014 FALL PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center 2012, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 1, 2014 - 2014 SPRING ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: ,

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Apr 2, 2013 - 2013 SPRING ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center 2012, 5205 N
Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Feb 19, 2013 - 2013 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center 2012, 5205 N
Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Nov 6, 2012 - 2012 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center 2012, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Jun 5, 2012 - 2012 JUNE 5 RECALL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center 2012, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

May 8, 2012 - 2012 MAY 8 RECALL PRIMARY/ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center 2012, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Apr 3, 2012 - 2012 PRESIDENTIAL PREFERENCE AND SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center 2012, 5205 N
Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Feb 21, 2012 - 2012 SPRING PRIMARY

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Aug 9, 2011 - 2011 RECALL ELECTION STATE SENATE 8

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Jul 12, 2011 - 2011 PRIMARY RECALL ELECTION STATE SENATE 8

You voted in this election!

Voting Method: Absentee

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 5, 2011 - 2011 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 15, 2011 - 2011 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 2, 2010 - 2010 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Sep 14, 2010 - 2010 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

**Nov 3, 2009 - WHITEFISH BAY SCHOOL DISTRICT
REFERENDUM**

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Apr 7, 2009 - 2009 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Feb 17, 2009 - 2009 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell
Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Nov 4, 2008 - 2008 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Sep 9, 2008 - 2008 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay -
Milwaukee County

Apr 1, 2008 - 2008 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 19, 2008 - 2008 PRESIDENTIAL PREFERENCE AND SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 3, 2007 - 2007 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 7, 2006 - 2006 GENERAL ELECTION

You voted in this election!

Voting Method:

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Sep 12, 2006 - 2006 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Lydell Recreation Center, 5205 N Lydell Ave, Whitefish Bay, Wi 53217-5002

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

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Madison, WI 53703

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Exhibit 2

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants.

THE WISCONSIN ASSEMBLY
DEMOCRATIC CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,

Defendants.

**PLAINTIFF ELIZABETH LENTINI'S RESPONSE TO DEFENDANTS' FIRST SET OF
INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Plaintiff Elizabeth Lentini ("Plaintiff"), a plaintiff in *Whitford, et al. v. Gill, et al.*, No. 15-cv-421-jdp, by and through her attorneys, responds as follows to Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiff (the "Requests"):

GENERAL RESPONSES AND OBJECTIONS

1. Plaintiff objects to the Requests to the extent that any one or more of the Requests place obligations on Plaintiff that exceed the requirements of the Federal Rules of Civil Procedure and other applicable law.
2. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production of documents or information that are subject to the attorney-client privilege,

work product doctrine, protections for experts employed only for trial preparation, or any other applicable privilege, protection, or immunity from discovery.

3. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information that is not relevant to the claims or defenses asserted in this litigation, or that is unlikely to lead to the discovery of admissible evidence.

4. Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks information protected by the associational privilege guaranteed by the First and Fourteenth Amendments to the Constitution of the United States, which protects people's right to associate for political, religious, and other reasons without fear of compelled disclosure of those associations. *See, e.g., NAACP v. Ala. ex rel. Patterson*, 357 U.S. 449, 460-61 (1958). The Supreme Court has recognized that such "compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . effective . . . restraint on freedom of association." *Id.* at 462. Plaintiff further objects to the Requests to the extent that any one or more of the Requests seeks to compel the disclosure of contributions to and expenditures by Plaintiff, as such information is protected by the First Amendment. *Brown v. Socialist Workers '74 Campaign Committee*, 459 U.S. 87, 98-99 (1982). Finally, Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks to identify the author or speaker of anonymous political speech that is also protected by the First Amendment. *See McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 342-43 (1995).

5. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production or disclosure of Plaintiff's personal information that is sensitive or protected by state or federal law, of individuals, without an appropriate protective order in place.

6. Plaintiff objects to the Requests to the extent that any one or more of the Requests is overly broad, unduly burdensome, vague, ambiguous, or confusing. The Federal Rules of Civil Procedure do not predicate the ability to seek vindication of important rights upon the ability of such plaintiffs to devote enormous amounts of time to finding and reviewing, for the purpose of responding to interrogatories, materials which are “not reasonably accessible due to undue burden or cost.” Fed. R. Civ. P. 26(b)(2)(B). Plaintiff further objects to the Requests to the extent that any one or more of the Requests requires speculation to determine its meaning or imprecisely describes the information sought.

7. Plaintiff objects to the Requests as unduly burdensome to the extent that any one or more of the Requests seeks information that is a matter of public record, is not in Plaintiff’s possession, custody, or control, is already in one or more Defendants’ possession, custody, or control, or is otherwise readily available to one or more Defendants.

8. Plaintiff objects to any one or more of the Requests that fails to specify a relevant period of time. Because the individual Plaintiffs have extensive histories of voting and/or being involved with grassroots organizing and elections in Wisconsin, a Request without a time limitation is overly broad and unduly burdensome.

9. If Plaintiff objects to a particular Request, either through these General Responses and Objections or through a specific objection raised below, but nevertheless responds to the Request in whole or in part, Plaintiff answers subject to and without waiving the specific or General Responses and Objections.

10. Plaintiff reserves the right to object to the admissibility of any information contained in her Responses to the Requests.

11. Plaintiff reserves the right to supplement her answers to all Requests.

INTERROGATORIES

Subject to and without waiving the General Responses and Objections above, Plaintiff responses to Defendants' Interrogatories as follows:

INTERROGATORY NO. 1

Please state the date that you began living in your current residence.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- December 1999.

INTERROGATORY NO. 2

For each Wisconsin State Assembly general election since 2002 for which you have lived at your current residence, please state the name and political affiliation of the candidate for whom you voted. If you did not vote in an election, please state as much.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2002: Sheldon Wasserman (D).
- 2004: Sheldon Wasserman (D).
- 2006: Sheldon Wasserman (D).
- 2008: Sandy Pasch (D).
- 2010: Sandy Pasch (D).

- 2012: Chris Rogers (D).
- 2014: Beth Lueck (D).
- 2016: I voted in this general election, but left this office blank because the Republican incumbent (Ott) was running unopposed, and I did not support the Republican candidate.
- 2018: Liz Sumner (D).

INTERROGATORY NO. 3

Identify any candidates for a partisan political office for whom you have voted in the last ten years who was not a Democrat, including the office for which that candidate was running and the year in which the election occurred.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- None.

INTERROGATORY NO. 4

Please describe any political parties or other political organizations of which you are a member, including the name of the organization or party and the date you became a member.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- I consider myself a Democrat, but I am not currently a dues-paying member of any political party or other political organization.

INTERROGATORY NO. 5

Please state whether you have run for partisan political office. If so, please state (a) the office for which you ran; (b) the date of the election; and (c) the outcome of the election.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff has never run for partisan political office.

INTERROGATORY NO. 6

Please describe any donations to candidates for political office, political parties, political action committees, or any other partisan political organization you have made since 2002, including (a) to whom you made the donation; (b) the amount of the donation; and (c) the date you made the donation.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 1, 4, and 6.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A – L, which include documents containing Plaintiff’s donations since 2002. These list to whom the donation was made, the amount of the donation, and the date of the donation. Plaintiff’s spouse Kevin Gibson also makes donations on Plaintiff’s behalf, and donations in his name are also included.

- In addition, Plaintiff and/or her spouse made the following contributions which do not appear in the above documents:
 - \$15 to Sarah Godlewski on October 29, 2018. Made in the name of Kevin Gibson, but from a joint checking account.

INTERROGATORY NO. 7

Please describe any other political activity, including volunteering for political campaigns, you have engaged in since 2002, including (a) the nature of the activity; and (b) the date on which you engaged in the activity.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Attended rally for John Kerry for President in November 2004.
- Participated in North Shore Democrats rally for Obama and other Democratic candidates in the fall of 2008.
- Distributed leaflets and lawn signs for Obama campaign in the fall of 2008 and 2012.
- On November 1, 2017, I spent a day in Madison volunteering to learn about effective gun control and anti-violence legislation and to meet with my elected officials about said legislation.
- Hosted a fundraiser for U.S. Senator Tammy Baldwin at my home in March 2018.
- Solicited and donated used furnishings (a few tables, coffee maker, a few corkboards) for Tammy Baldwin's Milwaukee office in the Spring of 2018.
- My home was used for a PAC event for U.S. Senator Tammy Baldwin in June 2018.
- I helped put together yard signs for Tammy Baldwin at the Milwaukee headquarters in June 2018.

- My home was used for the filming of a Tammy Baldwin campaign ad in September 2018.

INTERROGATORY NO. 8

Identify the people and/or groups with whom you want to associate but are allegedly burdened in doing so by Act 43.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Generally, other Democrats in my assembly district, region, and across the state of Wisconsin.

INTERROGATORY NO. 9

Please describe all the ways that act 43 has allegedly impaired “your ability to affiliate with like-minded Democrats and to pursue Democratic associational goals has been impaired by the Current Plan.”

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Response to Interrogatory No. 8. Generally, the Current Plan intentionally discriminates against me because I am a Democrat, disadvantaging myself, Democrats across the state, and the party I support in advocating and implementing preferred policies and achieving various associational goals.
- The village where I have lived for over 23 years, Whitefish Bay (WFB), is part of the continuous urban grid of the City of Milwaukee. We are served by the Milwaukee County bus system, which connects us to downtown Milwaukee, the East Side of Milwaukee, and the University of Wisconsin Milwaukee. Residents choose to live in Whitefish Bay because of the quality of the schools, the strong sense of community, and our closeness to the amenities of Milwaukee. Because of services provided by Milwaukee County to its residents, our property taxes are higher than communities outside of Milwaukee County.

- People who want big yards, new homes, and lower taxes don't move into WFB – they move into the suburbs outside of Milwaukee County, including those north of us such as Mequon, Grafton, Theinsville, and Germantown. These towns for the most part do not have sidewalks or any significant pedestrian friendly areas, and the homes are generally newer and bigger and have yards. After the gerrymandered map was put in place in 2011, WFB is now included as the southernmost town in a long, skinny district, stretching northward. The vast majority of the district is now outside of Milwaukee County and includes the towns of Mequon, Grafton, Theinsville, and Germantown. These communities are very different from WFB, and they are very heavily Republican.
- I believe that one result of the gerrymandering of District 23 is that Jim Ott, our current Republican state representative, has no motive or interest in listening to Democratic, liberal constituents such as myself because his election is assured based on the composition of the district. It is one thing to have disagreements, but it is another thing to simply not care about hearing from or engaging with constituents you disagree with. As a result, I feel completely unrepresented in the Wisconsin State Legislature (my State Senator is also a conservative Republican) because my elected officials have no interest in hearing my views, truly discussing the issues, or making their views known to me. It is very frustrating and makes me cynical about government and the value of my vote for the State Legislature in Wisconsin. I can see how some people might decide not to vote at all for anyone challenging Ott, because it is unlikely they will win.
- Jim Ott's dismissive attitude is evidence by a negative experience I had at the State Capitol in Madison on November 1, 2017. I gathered with other concerned Wisconsin voters for a day of education and lobbying on behalf of WAVE, the Wisconsin Anti-Violence Educational Fund. After a morning of legislative and educational briefings, a group of District 23 constituents gathered at Rep. Ott's office to try to talk to him or his staff about our favored legislative proposals regarding sensible limits on gun ownership and possession. Representative Ott was not in the office, and his assistant flatly refused to meet or talk with us. After hanging around for a few minutes, we left our materials behind and invited the staff person to join a scheduled meeting with staff members from Senator Darling's office later that afternoon. Ott's staff member did show up at the later meeting, but did not ask a question or say anything at all. It seemed like she was just going through the motions. I took a whole day to drive to Madison, learn about gun legislation, tromp around the State Capitol and then drive back that evening. It was exhausting. Will I do that again? I don't know. It is a conundrum because I firmly believe you have to show up to get heard, but it doesn't seem as if showing up for Rep. Ott actually means you will be heard. I think this undermines the purpose and integrity of our government. Why else have a democracy?
- Another example of Ott's lack of interest in WFB was his failure to show up at a debate in WFB during primary season with two of the Democratic contenders for his seat. The debate was sponsored by the League of Women Voters and was at the WFB Public Library. At the beginning of the debate, they said they had invited him (I can't remember if he actually declined to attend or just didn't respond).

- I am unlikely to work to unseat Ott because I quite frankly don't think we could do it because of how the district lines have been drawn, and there is only so much time and energy one has to spare. This was proven true by the most recent election, in 2018. Wisconsin Democrats were very energized – we took back all four statewide seats, including the governor's office – and a young woman from Fox Point mounted the most lively, energized effort to unseat Ott that has yet occurred. Unfortunately, but predictably, it failed. As a result, I have despair that as long as I live in District 23 as currently constituted, I will not have a representative who shares my political views or even listens to me, and I have no incentive to get involved organizing Democrats in District 23.
- It also affects my willingness to donate money to Democratic candidates running to unseat Ott or to help raise money for a Democratic candidate for District 23. I am retired and I am careful about the donations I make to political candidates. I am most likely to support someone who I think has a chance of winning and for whom my donation will actually make a difference. That is why I gave so much money to Tammy Baldwin in 2018 (more than I ever have to any candidate) and worked to help her get elected. I thought she had a good chance of being re-elected, but that it was not a sure thing and I felt my support could make a difference. I have not made a donation to the Democratic candidate for District 23 since Sandy Pasch was our representative.
- Along the same lines, I believe gerrymandering has also been responsible for difficulty in finding candidates to run against Rep. Ott. Our Democratic State Representative at the time of the gerrymandering, Sandy Pasch, decided not to run for re-election because of the strongly unfavorable makeup of the new district. To have had any chance at being reelected she would have had to actually move to a nearby town which was packed with Democrats. One year she ran completely unopposed. I have always wanted to run for office, and am retired and could conceivably have time to pursue that goal. But, trying to unseat Jim Ott in our gerrymandered district is a completely unrealistic goal. It would be a tilting-at-windmills activity. I applaud the woman who tried to unseat Ott in 2018, and I hope she tries to run again, but I fear it will be hard to attract decent candidates in the future.


INTERROGATORY NO. 10

Please describe all the ways in which Act 43 has, as alleged in paragraph 176 of your amended complaint, deterred you or hindered you from “turning out to vote, registering voters, volunteering for campaigns, donation money to candidates, running for office, appealing to independents, and advocating and implementing their preferred policies.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Responses to Interrogatories Nos. 8 and 9.

As to Answers to Interrogatories, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2018.



Elizabeth Lentini

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

All documents you used in preparing responses to the Interrogatories above.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 2, 4, and 5.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A – L for information on Plaintiff’s political contributions, as well as Exhibit M for Plaintiff’s voter history document from the Wisconsin Election Commission’s “My Vote” website.
- Plaintiff also received and reviewed a copy of the Amended Complaint in preparing answers to the above Interrogatories.
- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

REQUEST FOR PRODUCTION NO. 2

All documents you intend to use at trial in support of your claims.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

Respectfully submitted, this 27th day of November, 2018.

As to Objections and Responses to Production Requests,

/s/ Douglas M. Poland
Douglas M. Poland
State Bar No. 1055189
Alison E. Stites
State Bar. No. 1104819
RATHJE WOODWARD, LLC
10 East Doty St., Ste. 507
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(608) 960-7430
dpoland@rathjewoodward.com
astites@rathjewoodward.com

/s/ Ruth M. Greenwood
Ruth M. Greenwood
Annabelle E. Harless
CAMPAIGN LEGAL CENTER
73 W. Monroe St., Ste. 302
Chicago, IL 60603
(312) 561-5508
rgreenwood@campaignlegalcenter.org
aharless@campaignlegalcenter.org

Attorneys for Plaintiffs

Exhibit A

(Plaintiff's Political Donations - Wisconsin Campaign Finance Info System)

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|------------------------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name <input type="text" value="Lentini"/> | First Name <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name All Filing Periods | Occupation Title <input type="text"/> | Committee ID <input type="text"/> |
| Office | District/County | Branch | |
| Date Range <input type="text"/> | Amount Range (\$) <input type="text"/> - <input type="text"/> | Receiving Registrant | |

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| Transaction Date | Filing Period Name | Contributor Name | Contribution Amount | Address Line1 | City | State | Zip | Occupation Title | Employer Name | Employer Address | Contributor Type | Receiving Committee | Committee ID | Conduit | Office (Including Branch) | Comments | Segregated Funds |
|------------------|-------------------------|-----------------------|---------------------|----------------------|---------------|-------|-------|------------------------|---------------|------------------|------------------|---|--------------|---------|---------------------------|----------|------------------|
| 01/31/2017 | Spring Pre-Primary 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 01/13/2017 | Spring Pre-Primary 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 12/31/2016 | January Continuin 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | CHIEF COMPLIAN OFFICER | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 12/15/2016 | January Continuin 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | CHIEF COMPLIAN OFFICER | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 11/30/2016 | January Continuin 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | CHIEF COMPLIAN OFFICER | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 11/15/2016 | January Continuin 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | CHIEF COMPLIAN OFFICER | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 10/31/2016 | January Continuin 2017 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | CHIEF COMPLIAN OFFICER | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 10/15/2016 | Fall Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 09/30/2016 | Fall Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 09/15/2016 | Fall Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | | Individual | Northwestern Mutual Life Political Action | 0500133 | | | | Fal |

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| 08/31/2016 | September Report 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 08/15/2016 | September Report 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 07/31/2016 | September Report 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 07/15/2016 | Fall Pre-Primary 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 06/30/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 06/15/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 05/31/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 05/15/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 04/30/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 04/15/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 03/31/2016 | July Continuin 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 03/15/2016 | Spring Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 02/29/2016 | Spring Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 02/15/2016 | Spring Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |
| 01/31/2016 | Spring Pre-Election 2016 | Lentini, Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | Whitefish Bay | WI | 53217 | | | Individual | Northwestern Mutual Life Political Action Committee | 0500133 | | | | Fal |

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| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
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| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|------------------------|----------------------|------------|----------------------|-----------|-------|------|-------------------|-----------|--|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 01/15/2016 | Spring Pre-Electi 2016 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/31/2015 | January 2016 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/15/2015 | January 2016 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 11/30/2015 | January 2016 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| | January | Lentini | | 5525 N | White | | | CHIEF | | 720 E Wisconsin | | Northwestern Mutual Life | | | | | | |

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|------------|------------------|---------------------|--------|----------------------|-----------|----|------|------------------|-----|--------------------------------|--------|---|------|--|--|--|-------|
| 11/15/2015 | Conti 2016 | Elizabeth J. | \$9.00 | Hollywood Ave | Bay | WI | 5321 | COMP OFFIC | NML | Ave, Milwa WI 5320 | Indivi | Political Action Committee | 0500 | | | | False |
| 10/31/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/31/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2015 | Janua Conti 2016 | Lentir Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

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|------------|-----------------------|------------------------|--------|----------------------------|--------------|----|------|--------------------------------|-----|--|--------|---|------|--|--|--|-------|
| 06/30/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/15/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/31/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| | July | Lentir | | 5525 N | White | | | CHIEF | | 720 E Wisconsin | | Northwestern Mutual Life | | | | | |

View Receipts



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|------------|-----------------------|------------------------|--------|----------------------------|--------------|----|------|--------------------------------|-----|--|--------|---|------|--|--|--|-------|
| | | | | | | | | | | WI 5320 | | Committee | | | | | |
| 04/30/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/15/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/31/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/15/2015 | July Conti 2015 | Lentir Elizab J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLIANCE OFFICER | NML | 720 E Wisconsin Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| | July | Lentir | | 5525 N | White | | | CHIEF | | 720 E Wisconsin | | Northwestern Mutual Life | | | | | |

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|------------|-----------------|----------------------|--------|----------------------|-----------|----|------|----------------------|-----|--|------------|---|------|--|--|-------|
| 02/27/2015 | Conti 2015 | Elizabeth J. | \$9.00 | Hollywood Ave | Bay | WI | 5321 | COMPTROLLER OFFICE | NML | Ave, Milwaukee WI 5320 | Individual | Political Action Committee | 0500 | | | False |
| 02/15/2015 | July Conti 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLER OFFICE | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 01/31/2015 | July Conti 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLER OFFICE | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 01/15/2015 | July Conti 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPLER OFFICE | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|--------------------|----------------------|------------|----------------------|-----------|-------|------|-------------------|-----------|--|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 12/31/2014 | January 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/15/2014 | January 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee | Individual | Northwestern Mutual Life Political Action | 0500 | | | | False | |

View Receipts



| | | | | | | | | | | | | | | | | | | |
|------------|--------------|----------------------|--------|----------------------|-----------|----|------|-------------------|-----|--|------------|---|------|--|--|--|-------|--|
| 11/30/2014 | January 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 11/15/2014 | January 2015 | Lentini Elizabeth J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| | | | | | | | | | | 720 | | | | | | | | |

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|------------|--------------------------------|------------------------|--------|----------------------------|--------------|----|------|------------------------|-----|---|--------|---|------|--|-------|--|-------|
| 10/31/2014 | Janua Conti 2015 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/11/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$100 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Burke for Wisconsin | 0105 | | Gover | | False |
| 10/15/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/31/2014 | Fall Pre- Electi 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2014 | Fall Pre- Prima 2014 | Lentir Elizat J. | \$9.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| | July | Lentir | | 5525 N | | | | | | | | Northwestern Mutual Life | | | | | |

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|------------|-----------------|----------------------|--------|----------------------|-----------|----|------|--|--|--|------------|---|------|--|--|--|-------|
| 06/30/2014 | Conti 2014 | Elizabeth J. | \$7.00 | Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Political Action Committee | 0500 | | | | False |
| 06/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/31/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/30/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/31/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 02/28/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 02/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 01/31/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 01/15/2014 | July Conti 2014 | Lentini Elizabeth J. | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Individual | Northwestern Mutual Life Political Action | 0500 | | | | False |

Committee

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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

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| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|--------------------|---------------|------------|----------------------|-----------|-------|------|-------------------|-----------|--------------------------------|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 12/31/2013 | Janua Conti 2014 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/15/2013 | Janua Conti 2014 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 11/30/2013 | Janua Conti 2014 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 11/15/2013 | Janua Conti 2014 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
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|------------|------------------------|------------------|--------|----------------------------|--------------|----|------|------------------------|-----|--|--------|---|------|--|--|--|-------|
| 10/31/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/31/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2013 | Janua Conti 2014 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/30/2013 | July Conti 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

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|------------|-----------------|---------------|--------|----------------------|-----------|----|------|--|--|--|--------|---|------|--|--|--|-------|
| 06/15/2013 | July Conti 2013 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/31/2013 | July Conti 2013 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/15/2013 | July Conti 2013 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/30/2013 | July Conti | Lentir Elizab | \$7.00 | 5525 N Hollywood | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political | 0500 | | | | False |

View Receipts



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|------------|----------------------|---------------|--------|-------------------------|-----------|----|------|--------------------|-----|-------------------------------|--------|---|------|--|--|--|-------|
| 04/15/2013 | July Conti 2013 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/31/2013 | July Conti 2013 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2008 | Fall Pre-Electi 2008 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2008 | Fall Pre-Electi 2008 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2008 | Fall Pre-Electi 2008 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2008 | Fall Pre-Electi 2008 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

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|------------|------------------------------------|---------------|--------|----------------------|-----------|----|------|--|--|--|--------|---|------|--|--|--|-------|
| 03/15/2013 | 98th Asser / Sprin Pre-Electi 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 02/28/2013 | 98th Asser / Sprin Pre-Electi 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

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| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|------------------------------------|-------------------|------------|----------------------|-----------|-------|------|-------------------|-----------|--|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 02/15/2013 | 98th Asser / Sprin Pre-Electi 2013 | Lentini Elizabeth | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/31/2013 | 98th Asser / Sprin Pre-Electi 2013 | Lentini Elizabeth | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/15/2013 | 98th Asser / Sprin Pre-Electi 2013 | Lentini Elizabeth | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/31/2012 | Janua Conti 2013 | Lentini Elizabeth | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisconsin Ave, Milwaukee WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| | | | | | | | | | | 720 | | | | | | | | |

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|------------|--------------------------------|------------------|--------|----------------------------|--------------|----|------|------------------------|-----|--|--------|---|------|--|--|--|-------|
| 12/15/2012 | Janua Conti 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/30/2012 | Janua Conti 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/15/2012 | Janua Conti 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/31/2012 | Janua Conti 2013 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2012 | Fall Pre- Electi 2012 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2012 | Fall Pre- Electi 2012 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2012 | Fall Pre- Electi 2012 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2012 | Fall Pre- Electi 2012 | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2012 | Fall Pre- Electi | Lentir Elizat | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa | Indivi | Northwestern Mutual Life Political Action | 0500 | | | | False |

| | | | | | | | | | | | | | | | | | |
|------------|---------------------------------------|------------------|---------|------------------------|-----------|----|------|-------------------|-----|---|--------|---|------|--------------|-------|--|-------|
| 07/31/2012 | Fall Pre-Electi 2012 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | WI 5320 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2012 | Fall Pre-Electi 2012 | Lentir Elizab | \$7.00 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMPL OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/30/2012 | July Conti 2012 | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/15/2012 | July Conti 2012 | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/31/2012 | July Conti 2012 | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/05/2012 | July Conti 2012 | Lentir Elizab | \$50.00 | 5525 N. Hollywood Ave. | White Bay | WI | 5321 | | | | Indivi | Barrett for Wisconsin | 0101 | ActBlu Wisco | Gover | | False |
| 05/15/2012 | Speci Pre-Electi 2012 (Gov. Lt. Gov., | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action | 0500 | | | | False |

View Receipts



| | | | | | | | | | | | | | | | | | |
|------------|--|------------------|--------|----------------------|-----------|----|------|--|--|--|--------|---|------|--|--|--|-------|
| | 21, 23, 29) | | | | | | | | | | | | | | | | |
| 04/30/2012 | Speci Pre-Electi 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| | Speci | | | | | | | | | | | | | | | | |

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|------------|---|------------------|--------|----------------------|-----------|----|------|--|--|--------|---|------|--|--|--|-------|
| 04/15/2012 | Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/31/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/15/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 02/29/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentir Elizab Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|---|----------------------|------------|----------------------|-----------|-------|------|------------|-----------|-----------|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 02/15/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentini Elizabeth Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/31/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentini Elizabeth Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/15/2012 | Speci Pre-Prima 2012 (Gov. Lt. Gov., Sen. 13, 21, 23, 29) | Lentini Elizabeth Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |

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|------------|--|------------------------------|--------|-----------------------------------|---------------------|----|------|------------------------|-----|--|--------|--|------|--|--|--|-------|
| 12/31/2011 | Gov., Sen. 13, 21, 23, 29) Janua Conti 2012 | Jo Lentir Elizat Jo | \$7.50 | Ave 5525 N Hollywood Ave | Bay White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Action Committee Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 12/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/30/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/31/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMP OFFIC | NML | 720 E Wisco Ave, Milwa | Indivi | Northwestern Mutual Life Political Action | 0500 | | | | False |

| | | | | | | | | | | | | | | | | |
|------------|---|------------------------|--------|----------------------------|--------------|----|------|------------------------|---------------|--|--------|--|------|---------------------------------|--|-------|
| 08/31/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | WI 5320 720 E Wisco Ave, Milwa WI 5320 | Indivi | Committee Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 08/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 07/31/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 07/15/2011 | Janua Conti 2012 | Lentir Elizat Jo | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | CHIEF COMF OFFIC | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 08/01/2011 | Post Electi repor period for speci electi 2011 | Lentir Elizat | \$100 | 5525 N Hollywood Ave | White Bay | WI | | ATTO | north mutu | 700 E Wisco MILW WI | Indivi | Friends of Sandy Pasch | 0104 | State Asser Distri No. | | False |

View Receipts



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|------------|-----------------------|------------------|--------|----------------------------|--------------|----|--------------|--|--|--|--------|---|------|---------------------------------------|--|-------|
| | and Asm 48) | | | | | | | | | | | | | | | |
| 05/19/2011 | July Conti 2011 | Lentir Elizat | \$100 | 5525 N Hollywood Ave | White Bay | WI | 5321 5207 | | | | Indivi | Friends of Sandy Pasch | 0104 | State Asser Distri No. 10 | | False |
| 06/30/2011 | July Conti 2011 | Lentir Elizat | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 06/15/2011 | July Conti 2011 | Lentir Elizat | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

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|------------|--|---------------|--------|------------------------|-----------|----|------|--|--|--------|---|------|----------------|--|-------|
| 05/31/2011 | July Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 05/15/2011 | July Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 04/30/2011 | July Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 03/14/2011 | Sprin Pre-Electi 2011 | Lentir Elizab | \$100 | 5525 N. Hollywood Ave. | White Bay | WI | 5321 | | | Indivi | State Senate Democratic Comm | 0400 | ActBl Wiscc | | False |
| 04/15/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 03/31/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Repor |
|------------------|--|-------------------|------------|----------------------|-----------|-------|------|------------|-----------|-----------|------------|---|---------|-------|---------------------|------|-----------------|--------------|
| 03/15/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentini Elizabeth | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 02/28/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentini Elizabeth | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 02/15/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentini Elizabeth | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/31/2011 | Speci Pre-Electi 2011 (60th 83rd, | Lentini Elizabeth | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |

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|------------|--|---------------|--------|----------------------|-----------|----|------|------------------------|-----|--------------------------------|--|--------|---|------|--|--|--|--|-------|
| | 94th Asser | | | | | | | | | | | | | | | | | | |
| 01/15/2011 | Speci Pre-Electi 2011 (60th 83rd, 94th Asser | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 12/31/2010 | Janua Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL & AST SEC/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 12/15/2010 | Janua Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL & AST SEC/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 11/30/2010 | Janua Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL & AST SEC/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 11/15/2010 | Janua Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL & AST SEC/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 10/31/2010 | Janua Conti 2011 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL & AST SEC/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 10/15/2010 | Fall Pre-Electi 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |
| 09/30/2010 | Fall Pre-Electi 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL/S | NML | 720 E Wisco Ave, Milwa WI 5320 | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | | False |

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|------------|----------------------|---------------|--------|----------------------|-----------|----|------|--------------|-----|--------------------------------|--------|---|------|--|--|-------|
| 09/15/2010 | Fall Pre-Electi 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL/S | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 08/31/2010 | Fall Pre-Electi 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | AST GN CNL/S | NML | 720 E Wisco Ave, Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 08/15/2010 | Fall Pre-Prima 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 07/31/2010 | Fall Pre-Prima 2010 | Lentir Elizab | \$7.50 | 5525 N Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

View Receipts



| | | | | | | | | | | | | | | | | |
|------------|-----------------|---------------|--------|-------------------------|-----------|----|------|--|--|--|--------|---|------|--|--|-------|
| 07/15/2010 | Pre-Prima 2010 | Lentir Elizab | \$7.50 | Hollywood Ave | White Bay | WI | 5321 | | | | Indivi | Political Action Committee | 0500 | | | False |
| 06/30/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 06/15/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 05/31/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 05/15/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 04/30/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 04/15/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

| | | | | | | | | | | | | | | | | |
|------------|-----------------------|------------------|--------|-------------------------------|--------------|----|------|--|--|--|--------|---|------|--|--|-------|
| 03/29/2010 | July Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |
| 03/12/2010 | July Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | False |

Change page: [≤](#) [1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) [8](#) [9](#) [≥](#) | Displaying page 7 of 9, items 151 to 175 of 211



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| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|--------------------|---------------|------------|-------------------------|-----------|-------|------|--------------------|-----------|----------------------------------|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 02/28/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 02/15/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/31/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/15/2010 | July Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/31/2009 | Janua Conti 2010 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Avenue Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| | | | | | | | | ASST | | 720 E | | Northwestern | | | | | | |

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|------------|------------------------|------------------|--------|-------------------------------|--------------|----|------|--------------------------------|-----|---|--------|---|------|--|--|--|-------|
| 12/15/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | GC & ASST SEC | NML | Wisco Aveni Milwa WI 5320 | Indivi | Mutual Life Political Action Committee | 0500 | | | | False |
| 11/30/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/15/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/31/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/15/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/30/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 09/15/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/31/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST | NML | 720 E Wisco Aveni Milwa | Indivi | Northwestern Mutual Life Political Action | 0500 | | | | False |

| | | | | | | | | | | | | | | | | | |
|------------|------------------------|------------------|--------|-------------------------------|--------------|----|------|--------------------------------|-----|---|--------|---|------|--|--|--|-------|
| | | | | | | | | SEC | | WI 5320 | | Committee | | | | | |
| 07/31/2009 | Janua Conti 2010 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | ASST GC & ASST SEC | NML | 720 E Wisco Aveni Milwa WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2009 | Janua Conti | Lentir Elizat | \$6.00 | 5525 N Hollywood | White Bay | WI | 5321 | ASST GC & | NML | 720 E Wisco Aveni | Indivi | Northwestern Mutual Life Political | 0500 | | | | False |

View Receipts



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|------------|-----------------------|------------------|--------|-------------------------------|--------------|----|------|--|--|------|--------|---|------|--|--|--|-------|
| | | | | | | | | | | 5320 | | | | | | | |
| 06/30/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 06/15/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/31/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 05/15/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/30/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 04/15/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/31/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 03/15/2009 | July Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| | July | Lentir | | 5525 N | White | | | | | | | Northwestern Mutual Life | | | | | |

| | | | | | | | | | | | | | | | | | |
|------------|---------------|--------|--------|---------------------|-----|----|------|--|--|--|-------|----------------------------------|------|--|--|--|-------|
| 02/28/2009 | Conti 2009 | Elizat | \$6.00 | Hollywood Avenue | Bay | WI | 5321 | | | | Indiv | Political Action Committee | 0500 | | | | False |
|------------|---------------|--------|--------|---------------------|-----|----|------|--|--|--|-------|----------------------------------|------|--|--|--|-------|

Change page: [≤](#) [1](#) [2](#) [3](#) [4](#) [5](#) [6](#) [7](#) **8** [9](#) [≥](#) | Displaying page 8 of 9, items 176 to 200 of 211



View Receipts



Please Note: The filing period has been defaulted to the current filing period. Users may select a different filing period or none at all. Please choose at least one search filter. **Using multiple search filters will narrow your results.**

| | | | |
|----------------------|--|--|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Lentini"/> | <input type="text" value="Elizabeth"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condt | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|--------------------|---------------|------------|-------------------------|-----------|-------|------|---------------|-----------|-------------------------------|------------|---|---------|-------|---------------------|------|-----------------|---------------|
| 02/13/2009 | July Conti 2009 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/30/2009 | July Conti 2009 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 01/15/2009 | July Conti 2009 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | | | | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/31/2008 | Janua Conti 2009 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | Finan - Insur | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |
| 12/15/2008 | Janua Conti 2009 | Lentir Elizab | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | Finan - Insur | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False | |

| | | | | | | | | | | | | | | | | | |
|------------|-------------------------------|------------------|--------|-------------------------------|--------------|----|--------------|------------------------------|-----|--|--------|---|------|--|--|--|-------|
| 11/30/2008 | Janua Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | Finan - Insur | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 11/15/2008 | Janua Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | Finan - Insur | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 10/31/2008 | Janua Conti 2009 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 | Finan - Insur | NML | 720 E WISC AVE., MILW WI 5320 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 08/15/2008 | Fall Pre- Prima 2008 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 5207 | Cleric Supp - Secre | NML | 720 E. Milwa Aveni Milwa WI 5320 4703 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/31/2008 | Fall Pre- Prima 2008 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 5207 | Cleric Supp - Secre | NML | 720 E. Milwa Aveni Milwa WI 5320 4703 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |
| 07/15/2008 | Fall Pre- Prima 2008 | Lentir Elizat | \$6.00 | 5525 N Hollywood Avenue | White Bay | WI | 5321 5207 | Cleric Supp - Secre | NML | 720 E. Milwa Aveni Milwa WI 5320 4703 | Indivi | Northwestern Mutual Life Political Action Committee | 0500 | | | | False |

Change page: < 1 2 3 4 5 6 7 8 9 | Displaying page 9 of 9, items 201 to 211 of 211



(Plaintiff's Political Donations - Kevin Gibson Wisconsin Campaign Finance Info System)

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| | | | |
|----------------------|--|--|------------------------------------|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name | First Name |
| | | <input type="text" value="Gibson"/> | <input type="text" value="Kevin"/> |
| Filing Year | Filing Period Name | Occupation Title | Committee ID |
| | All Filing Periods | <input type="text"/> | <input type="text"/> |
| Office | District/County | Branch | |
| Date Range | Amount Range (\$) | Receiving Registrant | |
| <input type="text"/> | <input type="text"/> - <input type="text"/> | | |
| To | <input type="checkbox"/> Out of State Receipts | <input type="checkbox"/> Segregated Fund | |
| <input type="text"/> | | | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contr Name | Contr Amou | Address Line1 | City | State | Zip | Occu Title | Empl Name | Empl Addr | Contr Type | Receiving Committee | Comm ID | Condi | Office (Inclu Branc | Comm | Segre Fund Flag | 72 Hr. Report |
|------------------|--------------------|-------------|------------|------------------------|-------|-------|------|------------|-----------|-----------|------------|-------------------------|---------|-------|---------------------------|------|-----------------|---------------|
| 04/01/2016 | July Conti 2016 | Gibso Kevin | \$25.00 | 5525 N. Hollywood Ave. | Milwa | WI | 5321 | PROF | | | Indiv | Friends of Chris Larson | 0104 | | State Senat Distri No. 07 | | False | |
| 11/03/2014 | Janua Conti 2015 | Gibso Kevin | \$75.00 | 2505 Flagstone Dr | Plano | TX | 7507 | | | | Indiv | Friends of Scott Walker | 0102 | | Gover | | False | |

Change page: 1 | Displaying page 1 of 1, items 1 to 2 of 2



Exhibit C

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[DONATE](#)

(Plaintiff's Political Donations - Wisconsin Democracy Campaign)

[JOIN THE DEMOCRACY CAMPAIGN](#)

Contributions to ALL State Candidates

Advanced Search

Contribution Date:
 TO:

Contributor Last Name:

Candidate Last Name:

Employer:

Interest Category:

City, State, Zip

Start Amount: \$ \$

7 Contribution(s) Found - Total Amount Contributed: \$600.00

| Date | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|------------|-----------------------------------|--------------------|--------------------------|------------------------------------|-----------------------------|----------|
| 10/11/2014 | Burke, Mary | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Northwestern Mutual Life Insurance | Insurance | \$100.00 |
| 08/01/2011 | Pasch, Sandy | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Northwestern Mutual Life Insurance | Insurance | \$100.00 |
| 05/19/2011 | Pasch, Sandy | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Northwestern Mutual Life Insurance | Insurance | \$100.00 |
| 03/14/2011 | State Senate Democratic Committee | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Northwestern Mutual Life Insurance | Insurance | \$100.00 |
| 09/29/2006 | Doyle, Jim | Lentini, Elizabeth | Milwaukee, WI, 53217 | Attorney | Lawyers/Law Firms/Lobbyists | \$100.00 |
| 10/08/2004 | Wasserman, Sheldon | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Attorney | Lawyers/Law Firms/Lobbyists | \$50.00 |
| 01/09/2004 | Wasserman, Sheldon | Lentini, Elizabeth | Whitefish Bay, WI, 53217 | Attorney | Lawyers/Law Firms/Lobbyists | \$50.00 |

Jump to page

1

Wisconsin Democracy Campaign

203 South Paterson Street, Suite 100

Madison, WI 53703

Phone 608.255.4260

Fax 608.255.4359

wisd@wisd.org



Wisconsin Democracy Campaign is working for a real democracy that allows the common good to prevail over narrow interests. We track the money in state politics and fight for campaign finance and other democracy reforms. WDC is a tax-exempt 501(c)(3) nonprofit organization, and charitable contributions supporting our work are fully tax deductible when you itemize.

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Social Media



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Exhibit D (Plaintiff's Political Donations - OpenSecrets)

Donor Lookup

Advanced Search

First and Last Name of Donor
Q

Displaying records **1 - 32** of 32.

(Note: We only display the first 500 records. Need more? Please contact us requests@crp.org.)

LESS TIME WONDERING, MORE TIME K

First Name

Last Name

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|---|----------------------------|------------|----------|---------------------|
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | NORTHWESTERN MUTUAL | 06-30-2012 | \$250.00 | Obama, Barack (D) |
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | NORTHWESTER MUTUAL CAPITAL | 10-14-2012 | \$250.00 | Baldwin, Tammy (D) |
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | Not Employed | 10-04-2018 | \$50.00 | Baldwin, Tammy (D) |
| Money to Candidates | LENTINI, ELIZABETH MILWAUKEE, WI 53217 | NOT EMPLOYED | 10-04-2018 | \$50.00 | Baldwin, Tammy (D) |
| Money to Candidates | LENTINI, ELIZABETH MILWAUKEE, WI 53217 | NOT EMPLOYED | 10-04-2018 | \$50.00 | Heitkamp, Heidi (D) |
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | NORTHWESTERN MUTUAL | 10-17-2012 | \$250.00 | Obama, Barack (D) |

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|---|---------------------|----------------|------------|---------------------------------------|
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | NOT EMPLOYED | 03-04- 2018 | \$2,700.00 | Baldwin, Tammy (D) |
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | Not Employed | 09-24- 2018 | \$500.00 | Baldwin, Tammy (D) |
| Money to Candidates | LENTINI, ELIZABETH WHITEFISH BAY, WI 53217 | NORTHWESTERN MUTUAL | 10-17- 2012 | \$250.00 | Obama, Barack (D) |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 07-31- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 08-15- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 09-15- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 09-30- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 09-15- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 11-15- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 10-15- 2015 | \$15.00 | Northwestern Mutual Life Insurance |

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------|---|------------|----------------|---------|---------------------------------------|
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 11-15- 2015 | \$15.00 | Northwestern Mutual Life Insurance |

FEDERAL LAW PROHIBITS THE USE OF CONTRIBUTOR INFORMATION FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR ANY COMMERCIAL PURPOSE.

| | | | | | |
|---------------|---|-----|----------------|---------|---------------------------------------|
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 11-30- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 11-30- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 12-15- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 12-31- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 10-15- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 08-31- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 08-31- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 09-30- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J | NML | 08-15- 2016 | \$15.00 | Northwestern Mutual Life Insurance |

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|--|---|----------------|----------|---------------------------------------|
| | WHITEFISH BAY, WI 53217 | | | | |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 10-31- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 07-31- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 10-31- 2015 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 12-15- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to PACs | LENTINI, ELIZABETH J WHITEFISH BAY, WI 53217 | NML | 12-31- 2016 | \$15.00 | Northwestern Mutual Life Insurance |
| Money to Parties | LENTINI, ELIZABETH J MS WHITEFISH BAY, WI 53217 | THE NORTHWESTERN MUTUAL LIFE INSURANCE | 08-31- 2004 | \$250.00 | DNC Services Corp (D) |

* Data on individual contributions downloaded from the Federal Election Commission on October 31, 2018.
Federal law prohibits the use of contributor information for the purpose of soliciting contributions or for any commercial purpose. This database includes Federal Election Commission records of receipts from all individuals who contribute at least \$200 (smaller contributions are not part of the public record). Bear in mind that contributions to politicians can also be made through **Political Action Committees**.

We follow the money. You make it possible.

Select an amount to make a donation.

\$25

\$50

\$100

Other

 **DONATE TODAY**

Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

SIGN UP



Follow us on Twitter



Follow us on Facebook



Exhibit E

(Plaintiff's Political Donations - Federal Election Commission 2003-04)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 1 filtered results for: [Clear all filters](#)

-

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------------|---|-------|---|--------------|----------|
| LENTINI, ELIZABETH J MS. | <u>DNC SERVICES</u> <u>CORPORATION/DEMOCRATIC</u> <u>NATIONAL COMMITTEE</u> | WI | THE NORTHWESTERN MUTUAL LIFE INSURANCE | 08/31/2004 | \$250.00 |

Results per page:

Exhibit F**(Plaintiff's Political Donations - Federal Election Commission 2005-06)**

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 1 filtered results for: [Clear all filters](#)

-

Exhibit G

(Plaintiff's Political Donations - Federal Election Commission 2007-08)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 4 filtered results for: [Clear all filters](#)

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------|--------------------------|-------|------------------------|--------------|----------|
| LENTINI, ELIZABETH | <u>OBAMA FOR AMERICA</u> | WI | NORTHWESTERN MUTUAL | 09/29/2008 | \$100.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR AMERICA</u> | WI | NORTHWESTERN MUTUAL | 08/30/2008 | \$50.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR AMERICA</u> | WI | NORTHWESTERN MUTUAL | 08/02/2008 | \$100.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR AMERICA</u> | WI | NORTHWESTERN MUTUAL | 08/02/2008 | \$27.95 |

Results per page:

Exhibit H

(Plaintiff's Political Donations - Federal Election Commission 2009-10)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about **10** filtered results for: [Clear all filters](#)

01/01/2009

-

12/31/2010

"lentini, elizabeth"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/15/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | | WI | NML | 10/15/2010 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2010 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2009 | \$12.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2009 | \$12.00 |

Results per page:

100

Exhibit I

(Plaintiff's Political Donations - Federal Elections Commission 2011-12)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about **29** filtered results for: [Clear all filters](#)

01/01/2011

- 12/31/2012

"lentini, elizabeth"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------------|---|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2012 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2012 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2012 | \$14.00 |
| | | WI | | 11/26/2012 | \$12.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|---|-------|---------------------------------------|--------------|----------|
| LENTINI, ELIZABETH | <u>OBAMA VICTORY</u> <u>FUND 2012</u> | | NORTHWESTERN MUTUAL CAPITAL LLC | | |
| LENTINI, ELIZABETH J. | <u>THE</u> <u>NORTHWESTERN</u> <u>MUTUAL LIFE</u> <u>INSURANCE</u> <u>COMPANY FEDERAL</u> <u>PAC</u> | WI | NML | 11/15/2012 | \$14.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR</u> <u>AMERICA</u> | WI | NORTHWESTERN MUTUAL CAPITAL LLC | 11/01/2012 | \$35.00 |
| LENTINI, ELIZABETH J. | <u>THE</u> <u>NORTHWESTERN</u> <u>MUTUAL LIFE</u> <u>INSURANCE</u> <u>COMPANY FEDERAL</u> <u>PAC</u> | WI | NML | 10/31/2012 | \$14.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR</u> <u>AMERICA</u> | WI | NORTHWESTERN MUTUAL CAPITAL LLC | 10/23/2012 | \$100.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR</u> <u>AMERICA</u> | WI | NORTHWESTERN MUTUAL | 10/17/2012 | \$250.00 |
| LENTINI, ELIZABETH | <u>OBAMA FOR</u> <u>AMERICA</u> | WI | NORTHWESTERN MUTUAL | 10/17/2012 | \$250.00 |
| LENTINI, ELIZABETH J. | <u>THE</u> <u>NORTHWESTERN</u> <u>MUTUAL LIFE</u> | WI | NML | 10/15/2012 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------------|---|-------|-------------------------------|--------------|----------|
| | INSURANCE COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH | TAMMY BALDWIN FOR SENATE | WI | NORTHWESTER MUTUAL CAPITAL | 10/14/2012 | \$250.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2012 | \$14.00 |
| LENTINI, ELIZABETH | WALL FOR CONGRESS | WI | NORTHWESTERN MUTUAL | 09/19/2012 | \$50.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2012 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/31/2012 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE | WI | NML | 08/15/2012 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------------|---|-------|------------------------|--------------|----------|
| | COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH | OBAMA FOR AMERICA | WI | NORTHWESTERN MUTUAL | 06/30/2012 | \$250.00 |
| LENTINI, ELIZABETH | OBAMA VICTORY FUND 2012 | WI | NORTHWESTERN MUTUAL | 06/30/2012 | \$250.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE | WI | NML | 11/15/2011 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------------|---|-------|----------|--------------|---------|
| | COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/15/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2011 | \$14.00 |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE | WI | NML | 08/31/2011 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------------|---|-------|----------|--------------|---------|
| | COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH JO | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/15/2011 | \$14.00 |

Results per page:

Exhibit J

(Plaintiff's Political Donations - Federal Election Commission 2013-14)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about **20** filtered results for: [Clear all filters](#)

01/01/2013

-

12/31/2014

"lentini, elizabeth"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/15/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | | WI | NML | 10/15/2014 | \$15.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/31/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/15/2014 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/15/2013 | \$14.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/15/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/31/2013 | \$14.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/15/2013 | \$14.00 |

Results per page:

Exhibit K

(Plaintiff's Political Donations - Federal Election Commission 2015-16)

Home > Campaign finance data > Advanced data > Individual contributions

Individual contributions

Viewing about **22** filtered results for: [Clear all filters](#)

01/01/2015

-

12/31/2016

"lentini, elizabeth"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/15/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | | WI | NML | 10/15/2016 | \$15.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | | | | |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/31/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/15/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 07/31/2016 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/31/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 12/15/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/30/2015 | \$15.00 |

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|--------------------------|--|-------|----------|--------------|---------|
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 11/15/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/31/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 10/15/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/30/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 09/15/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/31/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 08/15/2015 | \$15.00 |
| LENTINI, ELIZABETH J. | THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY FEDERAL PAC | WI | NML | 07/31/2015 | \$15.00 |

Results per page:

Exhibit L

(Plaintiff's Political Donations - Federal Election Commission 2017-18)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 1 filtered results for: [Clear all filters](#)

-

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-----------------------|-----------------------------|-------|----------|--------------|------------|
| LENTINI, ELIZABETH | TAMMY BALDWIN FOR SENATE | WI | N/A | 03/04/2018 | \$2,700.00 |

Results per page:

Exhibit M (Plaintiff's Voter History 2006-18)



Military & Overseas Voters

🔍 Name

🔍 Address

MY VOTER INFORMATION

Lentini, Elizabeth J

Status: You are Registered to Vote!

Current Address: 5525 N Hollywood Ave , Whitefish Bay, WI 53217-5207

Update Name

Update Address

Register to Vote

If you are a military voter, you do not need to register. Click here to get an [absentee ballot](#)

MY NEXT ELECTION

2019 Spring Election

Tuesday, April 2, 2019



Polling Place: Whitefish Bay Public Library | 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Hours: 7.00 AM - 8.00 PM | [More Information](#)

Village Of Whitefish Bay - Ward 4

If you were issued a provisional ballot on Election Day, please check your voting activity below to see more information about your provisional ballot.

Would you like to request an absentee ballot for this election?

Request A Ballot

Can't make it to the polls due to age, hospitalization or disability? [Request an absentee ballot for all elections](#)

MY VOTING ACTIVITY

Aug 14, 2018 - 2018 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 3, 2018 - 2018 Spring Election

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 20, 2018 - 2018 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 8, 2016 - 2016 General Election

You voted in this election!

Voting Method: Absentee

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Aug 9, 2016 - 2016 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 5, 2016 - 2016 Spring Election and Presidential Preference Vote

You voted in this election!

Voting Method: Absentee

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 7, 2015 - 2015 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 4, 2014 - 2014 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Aug 12, 2014 - 2014 FALL PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 1, 2014 - 2014 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 2, 2013 - 2013 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 19, 2013 - 2013 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 6, 2012 - 2012 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Jun 5, 2012 - 2012 JUNE 5 RECALL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

May 8, 2012 - 2012 MAY 8 RECALL PRIMARY/ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Aug 9, 2011 - 2011 RECALL ELECTION STATE SENATE 8

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Jul 12, 2011 - 2011 PRIMARY RECALL ELECTION STATE SENATE 8

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 5, 2011 - 2011 SPRING ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 15, 2011 - 2011 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 2, 2010 - 2010 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 3, 2009 - WHITEFISH BAY SCHOOL DISTRICT REFERENDUM

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 7, 2009 - 2009 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 4, 2008 - 2008 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Sep 9, 2008 - 2008 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 1, 2008 - 2008 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 19, 2008 - 2008 PRESIDENTIAL PREFERENCE AND SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Apr 3, 2007 - 2007 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Feb 20, 2007 - 2007 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Nov 7, 2006 - 2006 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

Sep 12, 2006 - 2006 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Whitefish Bay Public Library, 5420 N Marlborough Dr, Whitefish Bay, WI 53217-5347

Voting Municipality: Village Of Whitefish Bay - Milwaukee County

[View My Current Elected Officials](#)



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Contact the State of Wisconsin Elections Commission

Office Address

212 East Washington Ave
3rd Floor
Madison, WI 53703

Mailing Address

P.O. Box 7984 Madison, WI 53707

Phone

Local: [\(608\) 266-8005](tel:(608)266-8005)

Toll-Free: [\(866\) VOTE-WIS](tel:(866)VOTE-WIS)

Fax: [\(608\) 267-0500](tel:(608)267-0500)

Email

Elections@wi.gov



[Wisconsin Elections Commission](#)

[Bring It to the Ballot](#)

Exhibit 3

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants.

THE WISCONSIN ASSEMBLY
DEMOCRATIC CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,

Defendants.

**PLAINTIFF ANN E. STEVNING-ROE'S RESPONSE TO DEFENDANTS' FIRST SET
OF INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Plaintiff Ann E. Stevning-Roe ("Plaintiff"), a plaintiff in *Whitford, et al. v. Gill, et al.*, No. 15-cv-421-jdp, by and through her attorneys, responds as follows to Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiff (the "Requests"):

GENERAL RESPONSES AND OBJECTIONS

1. Plaintiff objects to the Requests to the extent that any one or more of the Requests place obligations on Plaintiff that exceed the requirements of the Federal Rules of Civil Procedure and other applicable law.

2. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production of documents or information that are subject to the attorney-client privilege,

work product doctrine, protections for experts employed only for trial preparation, or any other applicable privilege, protection, or immunity from discovery.

3. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information that is not relevant to the claims or defenses asserted in this litigation, or that is unlikely to lead to the discovery of admissible evidence.

4. Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks information protected by the associational privilege guaranteed by the First and Fourteenth Amendments to the Constitution of the United States, which protects people's right to associate for political, religious, and other reasons without fear of compelled disclosure of those associations. *See, e.g., NAACP v. Ala. ex rel. Patterson*, 357 U.S. 449, 460-61 (1958). The Supreme Court has recognized that such "compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . effective . . . restraint on freedom of association." *Id.* at 462. Plaintiff further objects to the Requests to the extent that any one or more of the Requests seeks to compel the disclosure of contributions to and expenditures by Plaintiff, as such information is protected by the First Amendment. *Brown v. Socialist Workers '74 Campaign Committee*, 459 U.S. 87, 98-99 (1982). Finally, Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks to identify the author or speaker of anonymous political speech that is also protected by the First Amendment. *See McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 342-43 (1995).

5. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production or disclosure of Plaintiff's personal information that is sensitive or protected by state or federal law, of individuals, without an appropriate protective order in place.

6. Plaintiff objects to the Requests to the extent that any one or more of the Requests is overly broad, unduly burdensome, vague, ambiguous, or confusing. The Federal Rules of Civil

Procedure do not predicate the ability to seek vindication of important rights upon the ability of such plaintiffs to devote enormous amounts of time to finding and reviewing, for the purpose of responding to interrogatories, materials which are “not reasonably accessible due to undue burden or cost.” Fed. R. Civ. P. 26(b)(2)(B). Plaintiff further objects to the Requests to the extent that any one or more of the Requests requires speculation to determine its meaning or imprecisely describes the information sought.

7. Plaintiff objects to the Requests as unduly burdensome to the extent that any one or more of the Requests seeks information that is a matter of public record, is not in Plaintiff’s possession, custody, or control, is already in one or more Defendants’ possession, custody, or control, or is otherwise readily available to one or more Defendants.

8. Plaintiff objects to any one or more of the Requests that fails to specify a relevant period of time. Because the individual Plaintiffs have extensive histories of voting and/or being involved with grassroots organizing and elections in Wisconsin, a Request without a time limitation is overly broad and unduly burdensome.

9. If Plaintiff objects to a particular Request, either through these General Responses and Objections or through a specific objection raised below, but nevertheless responds to the Request in whole or in part, Plaintiff answers subject to and without waiving the specific or General Responses and Objections.

10. Plaintiff reserves the right to object to the admissibility of any information contained in her Responses to the Requests.

11. Plaintiff reserves the right to supplement her answers to all Requests.

INTERROGATORIES

Subject to and without waiving the General Responses and Objections above, Plaintiff responses to Defendants’ Interrogatories as follows:

INTERROGATORY NO. 1

Please state the date that you began living in your current residence.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- January 1992

INTERROGATORY NO. 2

For each Wisconsin State Assembly general election since 2002 for which you have lived at your current residence, please state the name and political affiliation of the candidate for whom you voted. If you did not vote in an election, please state as much.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2002: Amy Sue Vruwink (D)
- 2004: Amy Sue Vruwink (D)
- 2006: Amy Sue Vruwink (D)
- 2008: Amy Sue Vruwink (D)
- 2010: Amy Sue Vruwink (D)
- 2012: Paul Knoff (D)
- 2014: Norbert Salamonski (D)
- 2016: write-in vote for Norbert Salamonski (D)
- 2018: write-in vote for Kathleen Rulka (D)

INTERROGATORY NO. 3

Identify any candidates for a partisan political office for whom you have voted in the last ten years who was not a Democrat, including the office for which that candidate was running and the year in which the election occurred.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2008: Todd Wolf (Republican) – District Attorney; Susan Ginther (Republican) – Register of Deeds
- 2010: Cindy Joosten (Republican) – Clerk of Courts; Susan Ginther (Republican) – Register of Deeds
- 2012: Craig Lambert (Republican) – District Attorney; Susan Ginther (Republican) – Register of Deeds
- 2014: Cindy Joosten (Republican) – Clerk of Courts
- 2016: Craig Lambert (Republican) – District Attorney
- 2018 Cindy Joosten (Republican) - Clerk of Courts

INTERROGATORY NO. 4

Please describe any political parties or other political organizations of which you are a member, including the name of the organization or party and the date you became a member.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff participated in the Wood County Democrats and the Wisconsin Democratic Party for more than 10 years as a volunteer, but officially joined in early 2018.

INTERROGATORY NO. 5

Please state whether you have run for partisan political office. If so, please state (a) the office for which you ran; (b) the date of the election; and (c) the outcome of the election.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff has never run for partisan political office.

INTERROGATORY NO. 6

Please describe any donations to candidates for political office, political parties, political action committees, or any other partisan political organization you have made since 2002, including (a) to whom you made the donation; (b) the amount of the donation; and (c) the date you made the donation.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 1, 4, and 6.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A-C, which include documents containing Plaintiff's donations since 2002. These list to whom the donation was made, the amount of the donation, and the date of the donation.
- With respect to the donations listed in Exhibit B to Act Blue, Plaintiff believes there were three contributions of \$50 to Tammy Baldwin for U.S. Senate on August 10, 2017, February 4, 2018 and May 17, 2018.
- The following are not listed in Exhibits A to C, but Plaintiff believes she made two contributions for \$50 each to Brian Ewert for Congress in the 7th Congressional district in May and August 2018; a \$50 contribution to Chris Kapsner for State Senate on October

22, 2018, and a \$50 contribution to Margaret Englebretson for Congress on October 22, 2018.

INTERROGATORY NO. 7

Please describe any other political activity, including volunteering for political campaigns, you have engaged in since 2002, including (a) the nature of the activity; and (b) the date on which you engaged in the activity.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff volunteered as a neighborhood canvasser, made telephone calls, and was the elections integrity contact for the Democratic presidential, senate, congressional and state office elections in 2004 and 2008 – these activities included canvassing on weekends, calling prospective voters in the evenings, especially the week prior to the election and elections integrity training on a weekend before the election and on Election Day.
- Plaintiff volunteers to make Democratic telephone calls and was the elections integrity contact for Democratic presidential, senate, congressional, and state office elections in 2012.
- Plaintiff volunteered to make Democratic telephone calls and was the elections integrity contact for Democratic presidential, congressional, and state office elections in 2016.
- Plaintiff volunteered to make Democratic telephone calls for congressional and state office elections in 2006, 2010, and 2014.
- Plaintiff volunteered to gather petition signatures for the 2012 recall of Governor Scott Walker and made GOTV calls for the recall election.
- In 2006 Plaintiff made calls to other parts of the country via computer for Democratic candidates.
- In 2011 Plaintiff helped with a forum in Marshfield, Wisconsin, on gerrymandering with former Congressman David Obey, Wisconsin's representative Mandy Wright, and State Senator Julie Lassa.

- In August, 2017 Plaintiff organized a rally for Senator Tammy Baldwin; and volunteered the use of her office space for Senator Baldwin to use for a conference call during her travels across the state.
- In Spring of 2018, Plaintiff gathered nomination signatures for Senator Baldwin, Candidate Brian Ewert for Congress, signatures for the nomination of Kathleen Rulka for Assembly district 69 (she later dropped out and ran as a write in candidate), and Chris Kapsner for State Senate district 92.
- Plaintiff volunteered in the Wood County Democratic Booth at the county fair in August 2012, 2014, 2016, and 2018.
- On October 20, 2018 Plaintiff made calls for the local Democratic party (phone canvassing) from 12pm to 5pm.
- On October 21, 2018 Plaintiff canvassed neighborhoods for the Wood County Democratic party from 12pm to 5pm.
- On October 28, 2018 and October 29, 2018, Plaintiff canvassed neighborhoods for the Wood County Democratic Party from 12pm-5pm.
- On November 3, 2018 Plaintiff canvassed neighborhoods for the Wood County Democratic Party for GOTV from 12pm to 5pm.
- On November 4, 2018, Plaintiff made calls for the Wood County Democratic Party for GOTV from 12pm to 5pm.

INTERROGATORY NO. 8

Identify the people and/or groups with whom you want to associate but are allegedly burdened in doing so by Act 43.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Generally, other Democrats in Plaintiff's assembly district, region, and across the state of Wisconsin.

INTERROGATORY NO. 9

Please describe all the ways that act 43 has allegedly impaired “your ability to affiliate with like-minded Democrats and to pursue Democratic associational goals has been impaired by the Current Plan.”

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Response to Interrogatory No. 8. Generally, the Current Plan intentionally discriminates against me because I am a Democrat, disadvantaging myself, Democrats across the state, and the party I support in advocating and implementing preferred policies and achieving various associational goals.
- Assembly district 70 used to include the entire municipality of Marshfield WI, most of Wood County and Wisconsin Rapids. The district respected compactness, contiguity and preserved political boundaries of municipalities and counties for communities of interest.
- Assembly District 70 was a balanced district. The first time Amy Sue Vruwink ran after the retirement of Don Hasenorhl (D), there was a recount because the race was so close and Republican Mary Lippert won. In the next term, Amy Sue Vruwink, Democrat, won Assembly seat 70.
- After the 2011 redistricting, the municipality of Marshfield, was divided between District 69 and Assembly District 86 which mostly includes parts of Wausau area. Parts of Wood County are still in Assembly District 70 which has been stretched out snaking along toward Sparta and Tomah which are communities that have no commonality with Wood County.
- My old district, which Amy Sue Vruwink represented, was cracked for purposes of partisan political advantage. After the redistricting, Rep. Vruwink was approached by a Republican assembly leader who told her, “We f---ed you. We f---ed you good.” (See Exhibit E at 13-14).
- Since the gerrymander in 2011, there has been no chance for a Democratic candidate to prevail in Assembly District 69, 70 or 86. Plaintiff’s present district, 69, has had no Democratic candidate for the last two elections, because the district is so hopelessly gerrymandered.
- The balance of the city of Marshfield, in District 86, has no hope of a Democratic win. District 70 for part of Wood County toward Sparta and Tomah, has been steadily held by a Republican since the first term after redistricting without any Democratic prospects.

INTERROGATORY NO. 10

Please describe all the ways in which Act 43 has, as alleged in paragraph 176 of your amended complaint, deterred you or hindered you from “turning out to vote, registering voters, volunteering for campaigns, donation money to candidates, running for office, appealing to independents, and advocating and implementing their preferred policies.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Responses to Interrogatories Nos. 8 and 9.

As to Answers to Interrogatories, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2018.


Ann Stevning-Roe

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

All documents you used in preparing responses to the Interrogatories above.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 2, 4, and 5.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A - C for information on Plaintiff's political contributions, as well as Exhibit D for Plaintiff's voter history document from the Wisconsin Election Commission's "My Vote" website.
- See attached Exhibit E relating to material Plaintiff refers to in her Response to Interrogatory No. 9.
- Plaintiff also received and reviewed a copy of the Amended Complaint in preparing answers to the above Interrogatories.
- Plaintiff's search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

REQUEST FOR PRODUCTION NO. 2

All documents you intend to use at trial in support of your claims.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff's search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

Respectfully submitted, this 27th day of November, 2018.

As to Objections and Responses to Production Requests,

/s/ Douglas M. Poland
Douglas M. Poland
State Bar No. 1055189
Alison E. Stites
State Bar. No. 1104819
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/s/ Ruth M. Greenwood
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Campaign Legal Center
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rgreenwood@campaignlegalcenter.org
aharless@campaignlegalcenter.org

Attorneys for Plaintiffs

[View Receipts](#)



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| | | | |
|--|--|---|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name <input type="text" value="stevning-roe"/> | First Name <input type="text" value="ann"/> |
| Filing Year | Filing Period Name All Filing Periods | Occupation Title <input type="text"/> | Committee ID <input type="text"/> |
| Office | District/County | Branch | |
| Date Range <input type="text"/> To <input type="text"/> | Amount Range (\$) <input type="text"/> - <input type="text"/> <input type="checkbox"/> Out of State Receipts | Receiving Registrant <input type="checkbox"/> Segregated Fund | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contributor Name | Contribution Amount | Address Line1 | Address Line2 | City | State | Zip | Occupation Title | Employer Name | Employer Address | Contributor Type | Receiving Committee | Committee ID | Conduit | Office (Including Branch) | Comments | Segregated Fund Flag | 72 Hr. Reports |
|------------------|------------------------|--------------------|---------------------|----------------------------|---------------|------------|-------|-------|------------------|---------------|------------------|------------------|-----------------------------|--------------|---------|---------------------------|----------|----------------------|----------------|
| 10/10/2018 | Fall Pre-Election 2018 | Stevning Roe, Ann | \$50.00 | 209 Saturday. Columbus Dr. | | Marshfield | WI | 54449 | | | | Individual | Tony for Wisconsin | 0103465 | | Governor | | False | |
| 10/10/2018 | Fall Pre-Election 2018 | Stevning Roe, Ann | \$25.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | | | False | |
| 09/10/2018 | Fall Pre-Election 2018 | Stevning Roe, Ann | \$65.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | | | False | |
| 08/25/2018 | September Report 2018 | Stevning Roe, Ann | \$5.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | | | False | |
| 07/09/2018 | September Report 2018 | Stevning Roe, Ann | \$20.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | | | False | |
| 04/28/2018 | July Continui 2018 | Stevning Roe, Ann | \$10.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Lincoln Co Democratic Party | 0300100 | | | | False | |
| 04/28/2018 | July Continui 2018 | Stevning Roe, Anne | \$30.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Lincoln Co Democratic Party | 0300100 | | | | False | |



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| Date | Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch) | Flag | Reports |
|------------|---|---------------------|---------|-------------------|-------|------------|-------|-------|----------|------|---------|------------|-------------------------------|---------|-------------------------------|-------|---------|
| 06/09/2018 | July Continui 2018 | Stevning Roe, Ann | \$22.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 06/09/2018 | July Continui 2018 | Stevning Roe, Ann | \$7.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 02/12/2018 | July Continui 2018 | Stevning Roe, Ann | \$40.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 05/11/2018 | Special Pre-Election 2018 (1st Senate; 42nd Assembl | Stevning Roe, Ann | \$25.00 | 209 S Columbus Dr | | Marshfield | WI | 54449 | ATTORNI | | | Individual | Democratic Party of Wisconsin | 0300054 | | False | |
| 11/16/2016 | January Continui 2017 | Stevning Roe, Ann | \$10.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 09/09/2016 | Fall Pre-Election 2016 | Stevning Roe, Ann | \$10.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 03/24/2016 | July Continui 2016 | Stevning Roe, Ann | \$50.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Friends of Julie Lassa | 0103147 | State Senate, District No. 24 | False | |
| 10/05/2014 | Fall Pre-Election 2014 | Stevning Roe, Ann | \$50.00 | 209 S Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Burke for Wisconsin | 0105459 | Governo | False | |
| 09/25/2014 | Fall Pre-Election 2014 | STEVNING ROE, ANN E | \$50.00 | 209 COLUMBUS DR. | | MARSHFIE | WI | 54449 | | | | Individual | Salamonski for Assembly | 0105581 | State Assembl District No. 69 | False | |
| 08/21/2014 | Fall Pre-Election 2014 | Stevning Roe, Ann | \$5.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 10/09/2012 | Fall Pre-Election 2012 | Stevning Roe, Ann | \$10.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Wood Co Democratic Party | 0300250 | | False | |
| 09/10/2012 | Fall Pre-Election 2012 | Stevning Roe, Ann | \$10.00 | 209 Columbus Dr | | Marshfield | WI | 54449 | Attorney | | | Individual | Wood Co Democratic Party | 0300250 | | False | |



View Receipts

| Date | Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch) | Flag | Reports | |
|------------|---|-------------------|---------|-------------------|-------|------------|-------|------------|-------|------|---------|------------|-------------------------|---------|-------------------------------|------|---------|--|
| 05/16/2012 | Special Pre-Election 2012 (Gov., Lt. Gov., Sen. 13, 21, 23, 29) | Stevning Roe, Ann | \$25.00 | 209 Columbus Dr | | Marshfield | WI | 54449-2543 | | | | Individual | Friends of Donna Seidel | 0104282 | State Senate, District No. 29 | | False | |
| 05/16/2012 | Special Pre-Election 2012 (Gov., Lt. Gov., Sen. 13, 21, 23, 29) | Stevning Roe, Ann | \$25.00 | 209 S Columbus Dr | | Marshfield | WI | 54449 | | | | Individual | Barrett for Wisconsin | 0101475 | Governo | | False | |

Change page: 1 | Displaying page 1 of 1, items 1 to 21 of 21



Exhibit B

(Plaintiff's Political Donations – Federal Election Commission 2017-18)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about **3** filtered results for: [Clear all filters](#)

01/01/2017

-

10/31/2018

"stevning"

"54449"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|-------------------|-------------------------|-------|---------------------------|--------------|---------|
| STEVNING-ROE, ANN | ACTBLUE | WI | STEVNING-ROE LAW FIRM LLC | 05/17/2018 | \$50.00 |
| STEVNING-ROE, ANN | ACTBLUE | WI | STEVNING-ROE LAW FIRM LLC | 02/04/2018 | \$50.00 |
| STEVNING-ROE, ANN | ACTBLUE | WI | STEVNING-ROE LAW FIRM LLC | 08/10/2017 | \$50.00 |

Results per page:

Donor Lookup

Advanced Search

First and Last Name of Donor

Displaying records **1 - 1** of 1.

(Note: We only display the first 500 records. Need more? Please contact us requests@crp.org.)

PUBLIC RECORDS SEARCH

→

| Category | Contributor | Occupation | Date | Amount | Recipient |
|---------------------|--|------------------------------|----------------|---------|-----------------------|
| Money to Candidates | STEVNING-ROE, ANN MARSHFIELD, WI 54449 | STEVNING-ROE LAW FIRM LLC | 08-10- 2017 | \$50.00 | Baldwin, Tammy (D) |

FEDERAL LAW PROHIBITS THE USE OF CONTRIBUTOR INFORMATION FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR ANY COMMERCIAL PURPOSE.

* Data on individual contributions downloaded from the Federal Election Commission on October 19, 2018.
Federal law prohibits the use of contributor information for the purpose of soliciting contributions or for any commercial purpose. This database includes Federal Election Commission records of receipts from all individuals who contribute at least \$200 (smaller contributions are not part of the public record). Bear in mind that contributions to politicians can also be made through **Political Action Committees**.

We follow the money. You make it possible.

Select an amount to make a donation.

\$25

\$50

\$100

Other

 **DONATE TODAY**

Count Cash & Make Change

Sign up for our newsletter to track money's influence on U.S. elections and public policy.

Email address

SIGN UP



Follow us on Twitter



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Exhibit D
Referenced in Interrogatory 9

No. 16-1161

In the Supreme Court of the United States

BEVERLY R. GILL, ET AL.,
Appellants,

v.

WILLIAM WHITFORD, ET AL.,
Appellees.

**On Appeal from the United States District Court
for the Western District of Wisconsin**

**BRIEF FOR *AMICI CURIAE*
BIPARTISAN GROUP OF 65 CURRENT AND
FORMER STATE LEGISLATORS
IN SUPPORT OF APPELLEES**

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September 5, 2017

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INTEREST OF *AMICI CURIAE*

Amici are a bipartisan collection of 65 current and former state legislators, 26 Republicans and 39 Democrats, from the following eight States, all of which have suffered from partisan gerrymandering:

Wisconsin. Before Republicans' 2011 redistricting plan, competitive districts were the norm in Wisconsin. Control of one of the two legislative houses changed hands in four out of the five elections that took place between 2002 and 2010. In 2012, after the recent gerrymander, a majority of Wisconsin voters favored Democrats in state legislative races, but Republicans captured 60 of the 99 Assembly seats. In 2016, Democrats and Republicans were virtually tied, yet Republicans increased their majority in the Assembly to 64 seats. These election results reflect the partisan gerrymander that is the subject of this lawsuit.

Illinois. In recent years, both the Democratic and Republican parties have drawn maps that “maximize[] partisan advantage.” Cynthia Canary & Kent Redfield, *Partisanship, Representation and Redistricting: An Illinois Case Study* 12, Simon Rev. (Sept. 2014), <https://goo.gl/cv1ecA>. Democratic map-drawers were the latest to do so, drawing maps in 2011 that permitted them to win 60% of all House seats and 68% of Senate seats in 2012, with just 52% of the vote in the state House elections and 54% in state Senate elections—a significant improvement on their results under the previous map. *Id.* at 20.

Maryland. Democrats threatened in 2006 to “bury the Republicans,” Michael Collins, *Legislature May Step Up Partisan Warfare at State House*,

MarylandReporter.com (Jan. 2, 2017), <https://goo.gl/VEFXsc>. Through redistricting, they did. Democrats drew maps in 2011 that reflected the “specific[] inten[t] to dilute the effectiveness of Republican voters.” *Benisek v. Lamone*, No. JKB-13-3233, slip op. at 25 (D. Md. Aug. 24, 2017) (Niemeyer, J., dissenting). As a result, Democrats today enjoy vetoproof majorities in both chambers of the state legislature, holding 70% of the seats in the state Senate and roughly 64% of the seats in the House of Delegates.

Michigan. In 2012 and 2014, Democratic candidates received a majority of the votes in elections for the Michigan House of Representatives, but Republicans won a majority of the seats. Caughey et al., *supra* (manuscript at 26). And in the 2014 state Senate elections, Republicans received a bare majority of votes—less than 51%—but won 71% of the seats. *See Michigan State Senate Elections, 2014*, Ballotpedia, <https://goo.gl/xfca42> (last visited Aug. 30, 2017).

North Carolina. North Carolina’s state legislative districts are “some of the most egregiously gerrymandered” in the country. Jason Zengerle, *Is North Carolina the Future of American Politics?*, N.Y. Times Magazine (June 20, 2017), <https://goo.gl/C43fQb>. This gerrymander has allowed Republicans to maintain supermajorities in the state General Assembly and Senate since 2013. *Id.*; see Dan Boylan, *Republicans Headed Toward Keeping Veto-Proof Majorities*, News & Observer (Nov. 8, 2016), <https://goo.gl/VKqz1m>.

Ohio. The 2011 lines, which the state apportionment board approved on a party-line vote,

gave Republicans “a virtual lock” on the state legislature for a decade. Aaron Marshall, *GOP-Drawn Legislative Map Makes Republicans a Virtual Lock to Hold Ohio’s Legislature*, Cleveland.com (Sept. 26, 2011), <https://goo.gl/UPweJw>. In 2015, voters fed up with Ohio’s “hyper-partisan process for drawing legislative districts” approved a ballot initiative to reform the redistricting process for state elections. The changes go into effect in 2021. Jim Siegel, *Voters Approve Issue To Reform Ohio’s Redistricting Process*, Columbus Dispatch (Nov. 4, 2015), <https://goo.gl/aqRkeu>.

Pennsylvania. Legislative district lines in Pennsylvania are drawn by a five-member commission, four of whom are the majority and minority leaders of the state House and Senate. Pa. Const. art. 2, § 17(b). Those four members select the fifth member, who serves as chair. *Id.* If they are unable to agree on the chair, as has happened in every election cycle since the commission’s creation, the elected members of Pennsylvania’s State Supreme Court, “which has its own partisan balance of power, select[] the chair.” Mike Wereschagin, *The House Always Wins*, Caucus, Jan. 24, 2017, at 6. The result is that one party controls the commission and draws lines for political gain. In 2011, Republicans controlled redistricting and used it to “lock[] down [their] hold on the Legislature.” *Id.* In the 2016 elections, Republicans received 53% of the vote for the state House but won 60% of the seats. *Id.*

Rhode Island. State legislative district lines in Rhode Island are drawn by the political party that controls the legislature. In 2011, Democrats, who controlled both the state Senate and General

Assembly, created an “advisory commission” to help draw legislative boundaries and appointed 14 of the 18 members of that body, giving Republicans only one-ninth of the redistricting commission seats. The electoral maps that were subsequently enacted left Democrats in Rhode Island with an outsized role in the state legislative process. As of 2017, Democrats hold 86% of the state Senate seats and 84% of the seats in the General Assembly.

* * *

Amici served during or after the relevant gerrymandering in these States occurred, or have otherwise seen firsthand the harm that gerrymandering has inflicted upon the political process in their States. Many *Amici* are or have been involved in efforts to reform their States’ redistricting procedures. *See, e.g.*, Tim Cullen & Dale Schultz, *We Led the Wisconsin Senate. Now We’re Fighting Gerrymandering in Our State*, Wash. Post (June 20, 2017), <https://goo.gl/eXLecW>. All *Amici* have an interest in this case, which presents the Court with an opportunity to repair the damage partisan gerrymandering has caused to democracy throughout the United States.

A full list of *Amici*, with their respective States of service and party affiliation, is set forth in the Appendix.¹

¹ All parties have filed blanket consents to the filing of *amicus* briefs. No counsel for a party authored this brief in whole or in part, and no person other than *Amici*’s counsel made a monetary contribution to fund the preparation or submission of this brief.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

“The first instinct of power is the retention of power.” *McConnell v. Fed. Election Comm’n*, 540 U.S. 93, 263 (2003) (Scalia, J., dissenting in part), *overruled in part by Citizens United v. Fed. Election Comm’n*, 558 U.S. 310 (2010). True to that axiom, those in power have developed a seemingly infinite number of tools to insulate themselves from the will of the people. Some have manipulated the process by which candidates are nominated. *Terry v. Adams*, 345 U.S. 461 (1953). Others have diluted the voting strength of voters they do not like. *LULAC v. Perry*, 548 U.S. 399 (2006); *Reynolds v. Sims*, 377 U.S. 533 (1964). And, as in this case, yet others have “rigg[ed] elections,” plain and simple, by designing legislative districts that ensure their political party never loses majority control. *Vieth v. Jubelirer*, 541 U.S. 267, 317 (2004) (Kennedy, J., concurring) (internal quotation marks omitted).

The single-minded quest to obtain and retain political power at the expense of the will of the people, to quote Lord Acton’s famous dictum, “tends to corrupt.” *Wyman v. James*, 400 U.S. 309, 395 (1971) (Douglas, J., dissenting). Few tools for political entrenchment have corrupted our democracy more than modern-day gerrymanders designed to entrench legislators along party lines. This brief describes some of these effects, often in *Amici*’s own words.

First, although appellants and some of their *amici* make much hay out of the assertion that partisan gerrymandering is as old as the Republic, the truth is that in recent years the two major political parties, leveraging the technologies of the modern age, have

intentionally and systematically excluded each other from state legislatures like never before. In *Amici's* States, Democrats rigged the maps in Illinois, Maryland, and Rhode Island, while Republicans did so in Wisconsin, Michigan, Ohio, Pennsylvania, and North Carolina. This was done to entrench one party at the expense of the other, not to enact policy beneficial to the people.

Second, *Amici's* experience is that this partisan gerrymandering has, in their States and across the Nation, sounded the death-knell of bipartisanship. When maps have been gerrymandered, candidates and legislators need worry only about primaries, which are increasingly won by politicians who cater to the far ends of the ideological poles. The result is that politicians inclined toward collaboration and bipartisanship, like *Amicus* Evan Goyke, serve under “a cloud of uncertainty” because any legislator who reaches across the aisle is in grave danger of being defeated in the next primary. As *Amicus* Daylin Leach puts it, “cooperation is heresy.”

This lack of cooperation breeds distrust, dysfunction, and hostility. At best, *Amicus* Leach says, members of opposing parties ignore each other like boys and girls at “an eighth-grade dance.” At worst, they war like the Montagues and Capulets: “I’ll f— any Republican I can,” an Illinois Democrat in charge of redistricting once hectored a Republican colleague. The resulting malice and dysfunction are precisely the opposite of the ideal to which our democracy aspires.

Third, partisan gerrymandering has seriously damaged the relationship between legislators and the people they are sworn to represent. As those in power

grow accustomed to choosing their own voters, they stop treating the people as constituents to whom they must answer. Meanwhile, legislators in safe districts ignore constituents who support the other party because the only election that matters is the primary. Indeed, listening to those constituents creates unpalatable risks in the next primary. The result: Legislators avoid public events, hide government operations from the public eye, and, in the words of *Amicus* Kathleen Clyde, “belittle” and “mock” constituents who oppose their policies.

Even well-intentioned legislators may find it impossible to represent their constituents effectively. Gerrymandered districts often divide communities, making it next to impossible for legislators to represent community interests, and leaving voters confused about who their representatives are. *Amicus* Amy Sue Vruwink recounts how, after her district was redrawn, former constituents continued calling her for help, not realizing they had been gerrymandered out of her district. Other *Amici* describe how difficult it is for legislators to do their jobs when diverse communities with conflicting interests are grouped together.

The result of all this is that legislatures in many States are broken. This can be seen perhaps most starkly in North Carolina, where senators from the majority party recently attacked political opponents by cutting education funding from their rivals’ districts. There are many other less obvious but equally damning examples in *Amici*’s States of legislatures that no longer operate the way they should.

As *Amici* attest, modern-day gerrymandering by both parties represents a grave and growing threat to the Constitution's vision of democracy. The Court has not hesitated to step in when incumbents seek to entrench themselves at voters' expense or otherwise disenfranchise those they do not like. *E.g.*, *Reynolds*, 377 U.S. at 533. As in other cases where our democracy has been structurally warped, the problem of political gerrymandering cannot be solved through the ordinary political process. The Court should take this opportunity to enforce "the core principle of republican government, namely, that the voters should choose their representatives, not the other way around." *Ariz. State Leg. v. Ariz. Indep. Redistricting Comm'n*, 135 S. Ct. 2652, 2677 (2015) (internal quotation marks and citation omitted).

ARGUMENT

I. Partisan Gerrymandering Is A Powerful Tool For Systematically Shutting Out The Opposing Party.

In today's data-driven era, legislators who wish to secure their party's hold on power need only reach out for the block-by-block voter information and sophisticated computer programs that are both widely available. Armed with these tools, parties can solidify their electoral fortunes for years. The siren's call of this power is impossible for any self-interested politician to resist, and so it is no surprise that partisan gerrymandering is pervasive.

A. The information age has supercharged partisan gerrymandering. For a long time, the practice was ad hoc and largely ineffective, generating minor effects that were unlikely to persist across

election cycles. Nicholas O. Stephanopoulos & Eric M. McGhee, *Partisan Gerrymandering and the Efficiency Gap*, 82 U. Chi. L. Rev. 831, 875 (2015). Today, powerful software and detailed, block-by-block voter data enable redistricting plans to give one party huge partisan advantages that survive shifts in voter preferences and demographics. *E.g.*, *Maptitude for Redistricting Software*, Caliper Corp., www.caliper.com/mtredist.htm (last visited Aug. 30, 2017); Stephanopoulos & McGhee, *supra*, at 837-38; see Dkt. 149:199-201. A robust body of empirical research finds that “[t]he severity of today’s gerrymandering is [] unprecedented in modern times.” Stephanopoulos & McGhee, *supra*, at 836.²

To see how effectively partisan gerrymandering can insulate one party from voters, one need only consult how vote totals translate into seats in *Amici*’s gerrymandered States. Take, for example, the Wisconsin Assembly. In the 2012 elections, Democrats won their districts by an average vote share of 68.8%, which netted 39 Assembly seats, while Republicans were able to win far more seats (60) by creating districts with a smaller, but still comfortable, margin of 59.7%. Wang, *Application*, at 380. Or consider Illinois, where in 2012 the winning candidate in all but 16 state House and Senate districts won with more than 55% of the vote. Canary & Redfield, *supra*,

² See Anthony J. McGann et al., *Gerrymandering in America: The House of Representatives, the Supreme Court, and the Future of Popular Sovereignty* 87 (2016); Samuel S.-H. Wang, *Three Practical Tests for Gerrymandering: Application to Maryland and Wisconsin*, 15 Election L.J. 367, 380 (2016) (Wang, *Application*); Samuel S.-H. Wang, *Three Tests for Practical Evaluation of Partisan Gerrymandering*, 68 Stan. L. Rev. 1263, 1268 (2016) (Wang, *Tests*).

at 22-23. Or Michigan, where one party was guaranteed victory in 77% of the State's House and Senate districts from 2001 to 2011. Editorial, *Too Many Voters Lost Between the Lines*, Detroit Free Press (Feb. 11, 2011), <https://goo.gl/83VU7q>. Or Pennsylvania, where, in the words of *Amicus* Sen. Daylin Leach, "the majority of incumbents could not lose now if they were convicted of treason." See also Stephanopoulos & McGhee, *supra*, at 882-83; Wang, *Application*, at 378-81.

The power of modern partisan gerrymandering explains why both major parties now devote so much energy and money to the practice nationwide. Before the 2010 elections, Republicans instituted "REDMAP," a program designed to create and "solidify" Republican state and federal legislative majorities "through the redistricting process." Redistricting Majority Project, <http://www.redistrictingmajorityproject.com> (last visited Aug. 30, 2017). In 2009-2010 alone, REDMAP raised more than \$30 million to draw favorable district lines after the 2010 Census. *Id.* Democrats have formed a similar group to focus on redistricting after the 2020 Census. National Democratic Redistricting Committee, <https://www.democraticredistricting.com> (last visited Aug. 30, 2017).

B. Notwithstanding the unmistakable evidence and the District Court's findings, the Wisconsin Legislature would have the Court believe that partisan gerrymandering is a noble exercise in local policymaking. Brief for Wis. State Sen. & Wis. State Assembly as *Amici Curiae* 5-6. In reality, maps have been redrawn in Wisconsin (and elsewhere) for one

reason and one reason alone: to keep the redistricting party in power.

In Wisconsin, Republicans drew the gerrymandered maps in what *Amicus* Sandy Pasch, a former Assembly Representative, calls a “very strange and secretive” process. Map-drawers worked behind closed doors at a law firm, with no input or involvement from Democrats. Republican legislators were required to sign “secrecy oaths” before they were allowed to see the new redistricting maps, and even then they were only shown the map for their specific district. And, when all was said and done, the maps were approved on undeviating party lines to secure an election-proof partisan advantage. Appellees’ Br. at 10. That is hardly the process a legislature would use if it were acting to make “tough value-laden decisions” as part of “the give-and-take of the legislative process.” Brief for Wis. State Sen. et al. at 8 (internal quotation marks omitted).

Partisan warfare similarly overshadowed any semblance of policymaking in other States’ redistricting processes. In Maryland, Democrats bragged that, in the post-2010 redistricting process, they would “bury the Republicans six feet deep, faces up, so they won’t come out for 20 years.” Michael Collins, *Legislature May Step Up Partisan Warfare at State House*, MarylandReporter.com (Jan. 2, 2017), <https://goo.gl/VEFXsc>.

And they did. As Judge Niemeyer recently observed, “the Maryland Democrats who were responsible for redrawing congressional districts in 2011 *specifically* intended to dilute the votes of Republicans” *Benisek*, slip op. at 25 (Niemeyer, J., dissenting). “[T]hey moved 360,000 persons

(roughly one-half of the District's population) out of the former Sixth District . . . and simultaneously moved 350,000 into the 'new' Sixth District," thereby "accomplish[ing] the single largest redistricting swing of one party to another of any congressional district in the Nation." *Id.* at 25-26. These same tactics were used in redrawing the maps for the Maryland Legislature. *Amicus* Michael Malone, a Republican member of the Maryland House of Delegates, notes that "even after historic 2014 Republican membership gains in the Maryland House of Delegates and a Republican Governor being elected, Democrats still enjoy vetoproof majorities in both chambers of the Maryland Legislature today."

In Ohio, the apportionment board that drew the State's legislative districts in 2011 was made up of four Republicans and one Democrat. *Amicus* Representative Kathleen Clyde sat in for the Democratic member at a few board hearings and says that Democrats were "completely shut out of the process. Everything was done in back rooms and brought out at the very last minute with very little opportunity for public input." Republicans now enjoy an unshakeable majority in the state legislature for the rest of the decade, simply because Republicans drew the district lines in their favor.

C. The raw power grab that underlies modern gerrymandering is perhaps most obvious when district lines are used to threaten or disempower individual political opponents. In Maryland, the Democratic House Speaker gerrymandered his strongest challenger (a Republican) into another district. Len Lazarick, *New Legislative Map Targeting*

Republicans, Daily Record (Dec. 19, 2011), <https://goo.gl/vze2XL>.

Similarly, in 1991, Michigan Republicans cut *Amicus* Rep. Dianne Byrum's house from her district so precisely that she "could see [her former] district from [her] front door." Ten years later, in the midst of the 2011 redistricting, a top Michigan Republican legislator showed two potential redistricting plans to *Amicus* Rep. Lisa Brown, the first (and, so far, only) Democrat to represent her district. One map kept Rep. Brown's home in her district, and the other moved her into a predominantly Republican district. The lawmaker told Rep. Brown that, if she agreed to vote with Republicans, they would adopt the more favorable map. When she refused, the Republicans "gerrymandered [her] out of [her] district." David A. Lieb, *Analysis: Voting District Lines Favor GOP*, Detroit News (June 25, 2017), <https://goo.gl/UcdLPN>. As Rep. Brown explains, the Republicans viewed her seat as "theirs."

Rep. Pasch suffered a similar fate. In 2011, she ran against Republican Senator Alberta Darling in a recall election. In the midst of the recall race, map-drawers "demolished" Rep. Pasch's Assembly district by carving it into five new districts. After the gerrymander, her new district was 57% Republican, and a Republican won the new district in the 2012 election. Republican Assembly leaders later told Rep. Pasch that Senate Republicans demanded the changes to her district to "screw[]" her for "running against Alberta." This was not an isolated incident. Shortly after the maps were drawn, a Republican Assembly leader approached *Amicus* Amy Sue

Vruwink, then a Democratic Representative, and bragged, “We f—ed you. We f—ed you good.”

Partisan rancor (and foul language) also dominated the 2001 redistricting of the County Board for Madison County, Illinois. Early in the process, the Democrat in charge of redistricting told a Republican colleague, “We are going to shove [the map] up your f— ass and you are going to like it, and I’ll f— any Republican I can.” *Hulme v. Madison Cnty.*, 188 F. Supp. 2d 1041, 1051 (S.D. Ill. 2001) (internal quotation marks and citation omitted). At another meeting, he threatened a different Republican: “I’ll tell you right now, mother f—r, if you open your mother f— mouth, I’m gonna have your mother f— ass moved out by the mother f—g police.” *Id.* at 1050. And at the final meeting, after the Board approved the Democratic map, the Democratic leader publicly tore up a Republican-proposed map. *Id.* at 1051. This recalled Illinois’s 1981 state redistricting, which devolved into fisticuffs when a Republican Senator tried to charge at the Senate President, and a Democratic colleague stopped him with a punch to the jaw. Justin Levitt, Brennan Ctr. for Justice, *A Citizen’s Guide to Redistricting* 13 (2010); Bernard Schoenburg, *Unlawful Assembly*, St. J.-Reg., Dec. 3, 2009.

These episodes underscore an unassailable fact: Partisan gerrymanders in Wisconsin and elsewhere are not about policymaking. They are power’s means of preserving itself, reflecting an effort to reserve seats in the legislature for one party at the expense of the other. And they have pernicious effects on the political process in statehouses across the Nation.

II. Modern-Day Partisan Gerrymandering Has Caused Breakdowns In The Political Process.

“The object of districting is to establish ‘fair and effective representation for all citizens.’” *Vieth*, 541 U.S. at 307 (Kennedy, J., concurring) (quoting *Reynolds*, 377 U.S. at 565). The facts on the ground, however, establish that modern-day partisan gerrymanders intend to and do subvert the ideal of fair representation.

In *Amici*’s States, recent years have shown that partisan gerrymandering has contributed to a significant breakdown in democratic norms and governance. Legislatures have become ideologically polarized, beset by interpersonal rancor, and responsive only to a fraction of the electorate. *Amici*’s experiences confirm what this Court has recognized: Gerrymanders that are systematically designed to put one party in power no matter the will of the people “are incompatible with democratic principles.” *Ariz. State Leg.*, 135 S. Ct. at 2658 (alterations and internal quotation marks omitted).

A. Partisan Gerrymandering Breeds Polarization And Discourages Cooperation Among Legislators.

1. Partisan gerrymanders create “safe” districts for parties, with the result that the composition of state legislatures becomes more polarized. To see why that is so, consider the way gerrymanderers achieve their objective of reserving districts along party lines: Draw a small number of districts the opposing party will win by lopsided margins, and draw a large number of districts the redistricting party will win by narrower margins. *Davis v. Bandemer*, 478 U.S. 109,

115-17 & n.6 (1986). This process creates an overwhelming number of safe districts, with the gerrymandering party guaranteed to win in a majority of districts and the other party guaranteed to win in a minority.

Candidates in safe, gerrymandered districts are bound to appeal to primary voters, who tend to be farther from the ideological center. Once a candidate is selected as the party's standard-bearer, the fix is in. In the general election, members of the majority party reliably support their party's candidate, and candidates in safe districts therefore need not and do not temper their views. Richard H. Pildes, *The Constitutionalization of Democratic Politics*, 118 Harv. L. Rev. 28, 114-15 (2004).

The absence of competitive districts thus leads to legislators who do not reflect the ideological preferences of the people they represent. Consider a district composed of 60% Republicans and 40% Democrats, who reliably vote for their respective parties. Barring an extraordinary event, the district is safely Republican. To win the Republican primary, a candidate need only win votes from just over 30% of the total voters. In our two-party system, cross-party voting is relatively uncommon, and the smart candidate understands that his political fortunes depend on responsiveness to the 30% needed to win the primary—and nothing else.

2. Just as candidates in a gerrymandered district have little incentive to appeal to moderate voters in general elections, legislators in a gerrymandered State also have little incentive to cooperate with the opposing party or to endorse more moderate policies once they are in office. Quite the

opposite. “It’s like an eighth-grade dance,” says Sen. Leach. “When you go to a dinner, the Democrats are sitting on one side of the room, and the Republicans are sitting on the other. It’s embarrassing.”

Amici explain that in many of their States, earning a reputation for bipartisanship is the surest way to lose the next primary—and their seat. “Cooperation is heresy,” Sen. Leach says. He describes multiple meetings with Republicans who say they cannot help him with legislation—even legislation they support—because, they say, “I’ll get a primary, and my district is drawn in such a way that I couldn’t survive that.” *Amicus* Evan Goyke, a Democratic Representative in the Wisconsin Assembly, serves under “a cloud of anxiety” because he has been told that he is too willing to cooperate with Republicans. Other Democrats have told him that “working with Republicans is a negative,” and threaten that he will face a primary challenger unless he “give[s] the[] [Republicans] hell and never give[s] an inch.”

In many States, the decline of bipartisanship means that representatives from the minority party—and, therefore, their constituents—are shut out of the legislative process. Following the redistricting in Wisconsin, Republican lawmakers enacted new rules that limit Democrats’ ability to speak on legislation and refused to consider Democrat-sponsored amendments. As Rep. Pasch puts it, “Not only could [Democrats] not legislate, now we could not speak.”

Similarly, Rep. Clyde reports that Democrats in Ohio are not allowed to send newsletters to their constituents until Republican leaders review them, whereupon they sometimes require the removal of content critical of Republican legislators or policies.

Republican leaders also regularly prohibit Democrats from reserving committee rooms at the state capitol building for informational meetings, and refuse to publish Democrats' notes of protest in the legislative record, despite the Ohio Constitution's guarantee that protests "shall, without alteration, commitment, or delay, be entered upon the journal." Ohio Const. art. II, § 10.

B. Partisan Gerrymandering Leads To Legislators Who Do Not Or Cannot Represent Their Constituents.

"The genius of republican liberty seems to demand . . . not only that all power should be derived from the people, but that those intrusted with it should be kept in dependence on the people." *Ariz. St. Leg.*, 135 S. Ct. at 2674-75 (quoting *The Federalist* No. 37, at 223 (C. Rossiter ed. 1961) (James Madison)). Sovereignty under our Constitution ultimately rests with the people, and it is to the people that legislators must be held accountable. See Akhil Reed Amar, *America's Constitution: A Biography* 5, 10-13 (2005).

Modern-day partisan gerrymanders undermine the ideal of accountable legislators by entrenching a party in power regardless of whether it enjoys overall support among the State's voters. Samuel Issacharoff, *Gerrymandering and Political Cartels*, 116 Harv. L. Rev. 593, 616 (2002). As in Michigan, extreme gerrymanders can even provide majority control to "a party that enjoys only minority support among the populace." *Vieth*, 541 U.S. at 360 (Breyer, J., dissenting). Even in States where the results are not as stark as in Michigan, the effects of gerrymandered elections are perverse and pervasive.

Appellants and their *amici* contend that the Court should presume that legislators in gerrymandered districts are responsive to the concerns even of those who supported their opponents. Brief of Wis. State Sen. at 23-24.³ Although all politicians should strive to represent all their constituents, the reality in Wisconsin (and elsewhere) is otherwise, because gerrymandering gives legislators the incentive to ignore general-election voters who do not represent the views of their party. Judicial intervention is necessary precisely because gerrymandering subverts the ideal that legislators should represent all their constituents.

1. Partisan Gerrymandering Limits Legislators' Accountability.

Partisan gerrymandering harms all voters. For the voters whose political power a partisan gerrymander aims to diminish, an inability to elect and influence legislators amounts to exclusion from the political process. These constituents have been silenced and deprived of an effective vote and voice in the legislative process—an unconstitutional burden on their “representational rights . . . for reasons of ideology, beliefs, or political association.” *Vieth*, 541 U.S. at 315 (Kennedy, J., concurring).

The injury does not stop there. Gerrymandering causes legislators to treat even members of their own party in purely instrumental terms, moving them

³ This major premise underlies a number of their other arguments, including the assertion that there is no constitutional right to proportional representation. Brief of Wis. State Sen. et al. at 17-19. The harm of partisan gerrymandering is not the loss of proportional representation—it is the loss of *any* representation.

around the map as necessary to secure seats. This weaponization of demography robs voters of their agency and demeans their status as individuals with unique experiences, beliefs, and desires. In the words of *Amicus* Dale Schultz, formerly Wisconsin's Republican Senate Majority Leader, "partisan gerrymandering dilutes democracy by taking away a voter's ability to voice their particular beliefs to legislators who will acknowledge them." *Cf. Miller v. Johnson*, 515 U.S. 900, 911-12 (1995) (requiring States to treat voters "as individuals, not as simply components of a racial, religious, sexual, or national class" (internal quotation marks omitted)). Gerrymandering thus impedes legislators from discharging their sacred trust—to work to improve the lot of all the people.

Wisconsin *Amici* detail the sad circumstances in their State, where legislators have stopped engaging with constituents. *Amicus* Mark Pocan, a Wisconsin Congressman who served in the State Assembly for fourteen years, explains that many state legislators "don't want to engage with the public because they don't want voters to know what's actually going on in the statehouse." Wisconsin legislators in safe seats entirely ignore communications from voters of the opposite party: Phone calls are disregarded, letters thrown away, emails deleted. They refuse to hold hearings where voters might challenge them, and they skip community events. Assembly leaders have gone so far as to bar citizens from bringing writing materials to the Assembly—not even "paper for their kids to doodle on," according to Rep. Pasch. It is "an effort to silence and to control [constituents] in a very scary, nontransparent way."

Amicus Rick Glazier, a former Representative in the North Carolina House, similarly describes a post-gerrymander legislature in which “anything of significance is drafted in secret” without an opportunity for public input and debate. The majority “want[s] public dissent limited . . . and they want to prevent the minority party from creating a record for future litigation.”

And in Ohio, legislators from the majority party are “very hostile to witnesses who oppose or are interested in their legislation,” Rep. Clyde says. Citizens “have the right to testify on these bills, and if they oppose a bill it is open season for [legislators] to belittle them, mock them, limit their time, interrupt them during their discussion, [and] apply rules to them that don’t apply to supporters of the legislation. Treating members of the public that way is outrageous.”

2. Partisan Gerrymandering Harms Representation By Dividing Communities.

Even when legislators want to represent their constituents, partisan gerrymandering can make it all but impossible. Although partisan gerrymandering does not always translate into oddly shaped districts, it often involves and requires dividing communities.⁴

⁴ See J.A. 49-56 (illustrating egregious instances in Wisconsin’s 2011 redistricting plan); see also *LULAC*, 548 U.S. at 441 (gerrymander “br[oke] apart a Latino opportunity district” and “creat[ed] an entirely new district that combined two groups of Latinos, hundreds of miles apart, that represent different communities of interest”); *id.* at 479-80 (Stevens, J., concurring in part and dissenting in part) (gerrymander “splintered and submerged” minority community into majority white districts);

These tactics—splitting up similar communities and combining disparate communities—harm representation and accountability in distinct but related ways.

a. Representative “democracy can work well and fairly only when citizens have an opportunity to become familiar with their voting districts, where they must focus their political activities.” *Davis*, 478 U.S. at 173 n.13 (Powell, J., concurring in part and dissenting in part). But when gerrymandered district lines divide previously unified communities for partisan expediency, confusion arises among legislators and voters alike, making it difficult if not impossible for the well-intentioned legislator to represent his or her district.

For example, Rep. Vruwink served in the Wisconsin Assembly from 2003 until 2014. The 2011 redistricting changed her district (the 70th) from a compact square covering two counties to a long “staircase” cutting through parts of four. *See Assembly Districts*, Wis. State Leg., <https://maps.legis.wisconsin.gov/> (last visited Aug. 29, 2017). Constituents she had represented from 2003 to 2010 would call her for constituent services, not realizing they had been removed from her district in 2011. Conversely, Sen. Leach describes a recent phone

Vieth, 541 U.S. at 340 (Stevens, J., dissenting) (gerrymander “split[] up towns and communities”); *Davis*, 478 U.S. at 176-77 (Powell, J., concurring in part and dissenting in part) (gerrymander “divid[ed] established communities” and “dissect[ed] counties into strange shapes lacking in common interests”); *Karcher v. Daggett*, 462 U.S. 725, 762-64 (1983) (Stevens, J., concurring) (gerrymander “disregard[ed] county boundaries” and packed Republicans into “long,” “twisted” districts containing segments of multiple counties).

call with a constituent, in which he explained that he is running for office in Pennsylvania's 7th Congressional District. His constituent's response: "Am I in the 7th District?"

Amicus Michael Curtin, a former Ohio House Representative, also describes the confusion his constituents experienced. While campaigning in 2012, Rep. Curtin went door to door to speak to numerous constituents who, after the 2011 gerrymander, did not know who their representative was and did not understand why their district lines had changed so much.

The damage caused by this confusion is evident. *Amici* from Wisconsin note a decline in new Democratic candidates willing to run for elected office, while in Maryland, there is "anecdotal evidence of Republicans not voting after the redistricting because of confusion or loss of interest." *Benisek*, No. JKB-13-3233, slip op. at 56 (Niemeyer, J., dissenting).

b. Gerrymanders that divide communities, even when they do not cause confusion, create districts occupied by dissimilar voters whose interests may vary wildly. Nicholas O. Stephanopoulos, *Spatial Diversity*, 125 Harv. L. Rev. 1903, 1919 (2012). Representatives in such districts complain that they "simply [cannot] "represent" the views of . . . diverse groups when there are sharp conflicts." *Id.* at 1920 (quoting Malcolm E. Jewell, *Representation in State Legislatures* 117 (1982)); *see also id.* at 1945 (finding empirically that "representation [is] less responsive in . . . highly heterogeneous districts"). This is not just a matter of trying to represent an ideologically diverse constituency but also a serious practical concern; as *Amicus* David Parker, a former Republican

Representative from Pennsylvania, puts it, a district that covers multiple different communities “spreads you pretty thin and gives you less time to focus on each one.”

Rep. Curtin describes the senseless shape of his former district in Ohio as “a seahorse cut up by a boat propeller.” It begins in Marble Cliff, an affluent village in Franklin County. It separates Marble Cliff from its “sister city” Grandview Heights, with which it shares a school district, library district, and municipal services. The district juts southwest from Marble Cliff, then hooks east to capture low-income areas in southwest Columbus before trailing south into the sparsely populated areas north of Pickaway County. *See Franklin County House Districts*, Ohio Sec. of State, <https://goo.gl/1mxZrz> (last visited Aug. 29, 2017).

Similarly, Wisconsin’s 2011 gerrymander combined Racine and Kenosha into a single Senate district, forcing together the two cities, which have “separate school districts, separate newspapers, separate histories, and distinct and often separate goals,” while divorcing them from the rest of their counties. Editorial, *Senate Redistricting Is A Poor Marriage*, J. Times (July 13, 2011), <https://goo.gl/dYuvrp>.

South of the border in Illinois, redistricters showed a similar lack of respect for communities of interest. The 2011 gerrymander split Springfield into three pieces. One piece was placed into an Assembly District with Decatur, 40 miles to the east, and several rural areas in between, all of which have different social and economic characteristics. Decatur dominates the district, burdening voters in

Springfield and the rural areas. *See Legislative Districts of Illinois*, Ill. State Board of Elections, <https://goo.gl/JdKhcp> (last visited Aug. 29, 2017).

These sorts of divisions are the sine qua non of partisan gerrymandering. By drawing lines that divide communities to achieve political power, however, map-drawers leave community interests by the wayside.

C. Partisan Gerrymandering Is A Substantial Cause Of The Dysfunction Of Contemporary Politics.

In combination, the factors discussed above—seats reserved to ensure a majority for the redistricting party, hyper-partisan representatives, lack of cooperation in the statehouses, and district lines that divide communities—result in a toxic legislative environment. Legislators from different parties increasingly view one another with contempt, and the chief goal of politics is now tribalism, not public service. “[R]ational, civic discourse” is the best way “to form a consensus to shape the destiny of the Nation and its people.” *Schuette v. BAMN*, 134 S. Ct. 1623, 1637 (2014) (plurality opinion). Under political gerrymanders, however, partisan warfare is the lodestar, and the people are the losers.

In today’s troubled environment, legislation in Wisconsin is enacted, if at all, along party lines and solely to support party objectives. Just this past summer in Wisconsin, the State’s budget process “ground to a halt” after legislative relations among the Republicans themselves broke down. Matthew DeFour, *State Budget Impasse Escalates After Tense Negotiation Ends Abruptly*, Wis. State. J.

(June 28, 2017), <https://goo.gl/gMYb4R>. Despite this impasse—and the fact that Wisconsin state law required a new budget to be enacted by July 1—the Assembly Speaker expressed “no interest” in working with Democrats, with the consequence that Wisconsin is facing one of its worst budget delays in 40 years. *Id.*

Amicus Timothy Cullen, a former Wisconsin State Senator, notes that this trend pervades the lawmaking process in Wisconsin. The State historically established nonpartisan “study committees” every other summer to develop bipartisan legislation on complex issues concerning the environment, criminal justice, health care, and other matters, and these committees’ proposals generally became law with overwhelming bipartisan support. After the gerrymander, however, legislators are “not ever interested in gaining bipartisan support” and the study committees are no longer relied upon to craft bipartisan solutions. The result is that policy objectives that both parties support never become law.

In some States, the majority party has used its control of the legislature to vindictively target the minority or further entrench themselves in office—and often harm their opponents’ constituents in the process. Republican Senators in North Carolina recently “punish[ed]” Democrats who delayed budget legislation by “stripping \$1 million in education funding from the[ir] districts.” Zengerle, *supra*. The state House also “slashe[d] the budgets” of the Democratic Governor and Attorney General, Laura Leslie, *House GOP Seeks To Impeach Secretary of State*, WRAL.com (June 28, 2017), <https://goo.gl/x54ZR8>, because “Republican leaders don’t agree with how [the Attorney General] is doing

his job,” Laura Leslie, *Senate Leader Defends Deep Cuts to AG’s Office*, WRAL.com (June 22, 2017), <https://goo.gl/f1Nx9D>.

Less blatant but equally problematic: In Ohio, Rep. Clyde describes how “capital appropriations and general revenue funds [are] dispersed in a political way” to favor expenditures in Republican districts, which “put[s] people who are represented by Democratic representatives at a disadvantage.”

These measures were enacted by statute, albeit along party lines. But in gerrymandered States, majority parties also use procedural shenanigans to protect themselves from public scrutiny and debate with fellow legislators. *Amicus* Pam DeLissio, a State Representative from Pennsylvania, notes that her State’s “whole budget process often does not include Democrats at the negotiation table.” On a recent and controversial budget code bill, those in control of the process prevented members of the minority party from even reviewing the legislation until minutes before the vote. According to Rep. DeLissio, “when this legislation reached the floor, it passed with the bare majority of votes. There was no hearing on the bill. There was no conversation about this issue. This is what gerrymandering has done.” And in Wisconsin, Republican leaders used back-door methods to authorize the funding of an *amicus* brief in this case in support of appellants, at taxpayers’ expense and with no cap on fees, without debate or a vote on the statehouse floor. Patrick Marley & Jason Stein, *GOP*

Lawmakers to Write Blank Check To Hire Lawyers, J. Sentinel (Feb. 2, 2017), <https://goo.gl/mVhZVs>.⁵

III. Only This Court Can Redress The Damage Caused By Partisan Gerrymandering.

This Court has, on many occasions, been called upon to safeguard the democratic process from self-interested officeholders bent on manipulating elections. John Hart Ely, *Democracy and Distrust: A Theory of Judicial Review* 120-25 (1980); *see, e.g., Harper v. Va. Bd. of Elections*, 383 U.S. 663, 665-66 (1966) (poll taxes); *Reynolds*, 377 U.S. at 562-63 (malapportionment); *Gray v. Sanders*, 372 U.S. 368, 379-81 (1963) (vote weighting); *Terry*, 345 U.S. at 469-70 (white primaries). Partisan gerrymandering warrants the same response. In this case, the District Court identified a standard that it found appropriately captured the partisan intent and effect of the Wisconsin gerrymander, *Whitford v. Gill*, 218 F. Supp. 3d 837, 884 (W.D. Wis. 2016), but whatever standard this Court adopts, judicial intervention is sorely needed.

The nature of partisan gerrymandering indeed ensures that it cannot be undone through ordinary politics. Legislators who benefit from the practice

⁵ “The plan was approved 5-3 by an Assembly committee and 3-2 by a Senate committee. All Republicans voted for it and all Democrats voted against it.” *Id.* The Assembly Minority Leader “asked that legislators hold a public meeting to discuss the plan before approving it, but Republicans rejected his suggestion and proceeded with their plan to hire the law firms behind closed doors.” *Id.* The editorial board of a newspaper that had previously endorsed Republican Governor Scott Walker criticized the decision for its secrecy and expense. Editorial, *Turn Back Secretive GOP Power Play*, J. Sentinel (Feb. 5, 2017), <https://goo.gl/pn6xkE>.

have no incentive to halt it, despite “the almost universal absence of those who will defend its negative effect on our democracy.” *Benisek*, No. JKB-13-3233, slip op. at 27 (Niemeyer, J., dissenting). This state of affairs is self-perpetuating: Whichever political party controls redistricting can draw maps that guarantee it retains power until the next redistricting, at which point it can again draw maps that guarantee it retains power until the *next* redistricting, and on and on. *See, e.g.*, Editorial, *Maryland Democrats’ Faux Redistricting Reform*, Wash. Post, May 12, 2017 (describing how Republicans’ proposal to create an independent redistricting commission was “killed in committee by Democrats” without a hearing).

True, voters in some States have tried in recent years to address partisan gerrymandering through reforms such as independent redistricting commissions and constitutional amendments. *See Ariz. State Leg.*, 135 S. Ct. at 2658 (Arizona commission); *In re Senate Joint Resolution of Legislative Apportionment 1176*, 83 So. 3d 597, 598-99 (Fla. 2012) (Florida constitutional amendment); *Vandermost v. Bowen*, 269 P.3d 446, 452 (Cal. 2012) (California commission). These recent initiatives demonstrate voter dissatisfaction with partisan gerrymandering. But they also underscore the necessity of judicial intervention because the reforms, while laudable, are not a realistic option in most States.

The majority of States do not have any mechanism for citizen-driven lawmaking initiatives. *Comparison of Statewide Initiative Processes 1*, Initiative & Referendum Inst., <https://goo.gl/69LZ1R>

(last visited Aug. 30, 2017). Even when such a mechanism is available, some States may not allow initiatives that address redistricting. *See Hooker v. Ill. State Bd. of Elections*, 63 N.E.3d 824, 825 (Ill. 2016) (holding that ballot initiative to create independent redistricting committee violated Illinois Constitution). And, in every State but California, the legislature can repeal laws passed by initiative. Initiative & Referendum Inst., *supra*, at 26-27; *see* James Nord, *After Repeal, Ethics Law Supporters To Push Ballot Amendment*, Rapid City J. (Apr. 6, 2017), <https://goo.gl/4HznMn> (discussing the South Dakota legislature's repeal of an ethics law passed via ballot initiative).

The Court, by contrast, has the ability to craft a nationwide standard that will put partisan gerrymanderers in check. The Court is therefore in the best position to repair the damage partisan gerrymandering has done to the political process throughout the Nation.

CONCLUSION

The Court should affirm the judgment of the District Court.

Respectfully submitted,

VINCENT LEVY

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September 5, 2017

APPENDIX

Amici consist of the following current and former state legislators, all of whom are represented by counsel in their individual capacity only:

1. State Rep. Jimmy Anderson of Wisconsin (Democrat)
2. State Rep. Nickie J. Antonio of Ohio (Democrat)
3. U.S. Senator Tammy Baldwin of Wisconsin (Democrat, former member of the Wisconsin State Assembly)
4. Former State Rep. Mandela Barnes of Wisconsin (Democrat)
5. Former State Rep. Spencer Black of Wisconsin (Democrat)
6. State Senate Republican Leader William E. Brady of Illinois (Republican)
7. Former State Rep. Lisa Brown of Michigan (Democrat)
8. Former State Rep. Dianne Byrum of Michigan (Democrat)
9. State Rep. Kathleen Clyde of Ohio (Democrat)
10. State Sen. Michael Connelly of Illinois (Republican)
11. Former State Senate Majority Leader Timothy F. Cullen of Wisconsin (Democrat)
12. Former State Rep. Michael F. Curtin of Ohio (Democrat)
13. State Rep. Mary Jo Daley of Pennsylvania (Democrat)

14. Former State Rep. Chris Danou of Wisconsin (Democrat)
15. State Rep. Pamela A. DeLissio of Pennsylvania (Democrat)
16. Former State Rep. Margaret Dickson of North Carolina (Democrat)
17. State Rep. Scott Drury of Illinois (Democrat)
18. State Rep. Michael R. Fortner of Illinois (Republican)
19. Former State Sen. Linda Garrou of North Carolina (Democrat)
20. Former State Rep. Rick Glazier of North Carolina (Democrat)
21. State Rep. Evan Goyke of Wisconsin (Democrat)
22. State Rep. Abdullah Hammoud of Michigan (Democrat)
23. State Rep. Kevin Hertel of Michigan (Democrat)
24. Former Deputy Minority Leader Sen. Dawson Hodgson of Rhode Island (Republican)
25. State Rep. Jeanne M. Ives of Illinois (Republican)
26. Former State Rep. Andy Jorgensen of Wisconsin (Democrat)
27. Former State Sen. Franklin L. Kury of Pennsylvania (Democrat)
28. State Rep. Donna Lasinski of Michigan (Democrat)

29. Former State Rep. Joan W. Lawrence of Ohio (Republican)
30. State Sen. Daylin Leach of Pennsylvania (Democrat)
31. State Delegate Michael E. Malone of Maryland (Republican)
32. Former State Rep. David Martin of Wisconsin (Republican)
33. State Sen. Dan McConchie of Illinois (Republican)
34. State Sen. Karen McConnaughay of Illinois (Republican)
35. Former State Sen. Priscilla D. Mead of Ohio (Republican)
36. Congresswoman Gwen Moore of Wisconsin (Democrat, former member of the Wisconsin State Senate and State Assembly)
37. State Sen. Chris Nybo of Illinois (Republican)
38. State Rep. David S. Olsen of Illinois (Republican)
39. Dane County Executive Joe Parisi of Wisconsin (Democrat, former member of the Wisconsin State Assembly)
40. Former State Rep. H. Sheldon Parker, Jr., of Pennsylvania (Republican)
41. Former State Assembly Assistant Minority Leader Sandy Pasch of Wisconsin (Democrat)
42. Congressman Mark Pocan of Wisconsin (Democrat, former member of the Wisconsin State Assembly)

43. State Rep. Robert W. Pritchard of Illinois (Republican)
44. Former State Rep. Daniel P. Reilly of Rhode Island (Republican)
45. State Sen. Sue Rezin of Illinois (Republican)
46. State Sen. Dale A. Righter of Illinois (Republican)
47. State Sen. Chapin Rose of Illinois (Republican)
48. Former State Sen. Peggy A. Rosenzweig of Wisconsin (Republican)
49. State Sen. Joe Schiavoni of Ohio (Democrat)
50. Former State Rep. Marlin Schneider of Wisconsin (Democrat)
51. Former State Senate Majority Leader Dale W. Schultz of Wisconsin (Republican)
52. Former State Rep. David Segal of Rhode Island (Democrat)
53. Deputy State Senate Republican Leader Dave Syverson of Illinois (Republican)
54. State Sen. Heather Steans of Illinois (Democrat)
55. Former State Rep. David J. Steil of Pennsylvania (Republican)
56. Councilman Michael Stinziano of Ohio (Democrat, former member of the Ohio State House of Representatives)
57. State House Democratic Leader Fred Strahorn of Ohio (Democrat)

- 58.State Rep. Emilia Strong Sykes of Ohio
(Democrat)
- 59.State Sen. Vernon Sykes of Ohio (Democrat)
- 60.Former State Sen. Daniel O. Theno of
Wisconsin (Republican)
- 61.State Sen. Jil Tracy of Illinois (Republican)
- 62.Former State Rep. Amy Sue Vruwink of
Wisconsin (Democrat)
- 63.State Sen. Chuck Weaver of Illinois
(Republican)
- 64.State Rep. Robert Wittenberg of Michigan
(Democrat)
- 65.Former State Rep. Mandy Wright of Wisconsin
(Democrat)

Exhibit E

(Plaintiff's Voter History 2006-2018)



Military & Overseas Voters

🔍 Name

🔍 Address

MY VOTER INFORMATION

Stevning-Roe, Ann E

Status: You are Registered to Vote!

Update Name

Current Address: 209 Columbus Dr , Marshfield, WI 54449-2543

Update Address

Register to Vote

If you are a military voter, you do not need to register. Click here to get an [absentee ballot](#)

MY NEXT ELECTION

2019 Spring Election

Tuesday, April 2, 2019



Polling Place:

Oak Avenue Community Center
201 S Oak Ave, Marshfield, WI 54449

Hours:

7.00 AM - 8.00 PM

[More Information](#)

City Of Marshfield - Ward 13

**If you were issued a provisional ballot on Election Day,
please check your voting activity below to see more
information about your provisional ballot.**

Would you like to request an absentee ballot for this election?

Request A Ballot

Can't make it to the polls due to age, hospitalization or disability?
[Request an absentee ballot for all elections](#)

MY VOTING ACTIVITY

Nov 6, 2018 - 2018 General Election

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Aug 14, 2018 - 2018 Partisan Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 3, 2018 - 2018 Spring Election

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 20, 2018 - 2018 Spring Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 4, 2017 - 2017 Spring Election

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 21, 2017 - 2017 Spring Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 8, 2016 - 2016 General Election

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Aug 9, 2016 - 2016 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 5, 2016 - 2016 Spring Election and Presidential Preference Vote

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 16, 2016 - 2016 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 7, 2015 - 2015 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 17, 2015 - 2015 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 4, 2014 - 2014 GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Aug 12, 2014 - 2014 FALL PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 1, 2014 - 2014 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 18, 2014 - 2014 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 19, 2013 - 2013 SPECIAL ELECTION ASSEMBLY 69

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Oct 22, 2013 - 2013 SPECIAL PRIMARY ASSEMBLY 69

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 2, 2013 - 2013 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 19, 2013 - 2013 SPRING PRIMARY

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 6, 2012 - 2012 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Aug 14, 2012 - 2012 PARTISAN PRIMARY

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Jun 5, 2012 - 2012 JUNE 5 RECALL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

May 8, 2012 - 2012 MAY 8 RECALL PRIMARY/ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 3, 2012 - 2012 PRESIDENTIAL PREFERENCE AND SPRING ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 5, 2011 - 2011 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 15, 2011 - 2011 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 2, 2010 - 2010 GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Sep 14, 2010 - 2010 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 6, 2010 - 2010 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 16, 2010 - 2010 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 7, 2009 - 2009 SPRING ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 17, 2009 - 2009 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 4, 2008 - 2008 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Sep 9, 2008 - 2008 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 1, 2008 - 2008 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 19, 2008 - 2008 PRESIDENTIAL PREFERENCE AND SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Apr 3, 2007 - 2007 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Feb 20, 2007 - 2007 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Nov 7, 2006 - 2006 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

Sep 12, 2006 - 2006 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Oak Avenue Community Center, 201 S Oak Ave, Marshfield, Wi 54449

Voting Municipality: City Of Marshfield - Multiple Counties

[View My Current Elected Officials](#)



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Exhibit 4

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants.

THE WISCONSIN ASSEMBLY
DEMOCRATIC CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,

Defendants.

**PLAINTIFF DANIEL DIETERICH'S RESPONSE TO DEFENDANTS' FIRST SET OF
INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Plaintiff Daniel Dieterich ("Plaintiff"), a plaintiff in *Whitford, et al. v. Gill, et al.*, No. 15-cv-421-jdp, by and through his attorneys, responds as follows to Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiff (the "Requests"):

GENERAL RESPONSES AND OBJECTIONS

1. Plaintiff objects to the Requests to the extent that any one or more of the Requests place obligations on Plaintiff that exceed the requirements of the Federal Rules of Civil Procedure and other applicable law.
2. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production of documents or information that are subject to the attorney-client privilege,

work product doctrine, protections for experts employed only for trial preparation, or any other applicable privilege, protection, or immunity from discovery.

3. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information that is not relevant to the claims or defenses asserted in this litigation, or that is unlikely to lead to the discovery of admissible evidence.

4. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information protected by the associational privilege guaranteed by the First and Fourteenth Amendments to the Constitution of the United States, which protects people's right to associate for political, religious, and other reasons without fear of compelled disclosure of those associations. *See, e.g., NAACP v. Ala. ex rel. Patterson*, 357 U.S. 449, 460-61 (1958). The Supreme Court has recognized that such "compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . effective . . . restraint on freedom of association." *Id.* at 462. Plaintiff further objects to the Requests to the extent that any one or more of the Requests seeks to compel the disclosure of contributions to and expenditures by Plaintiff, as such information is protected by the First Amendment. *Brown v. Socialist Workers '74 Campaign Committee*, 459 U.S. 87, 98-99 (1982). Finally, Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks to identify the author or speaker of anonymous political speech that is also protected by the First Amendment. *See McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 342-43 (1995).

5. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production or disclosure of Plaintiff's personal information that is sensitive or protected by state or federal law, of individuals, without an appropriate protective order in place.

6. Plaintiff objects to the Requests to the extent that any one or more of the Requests is overly broad, unduly burdensome, vague, ambiguous, or confusing. The Federal Rules of Civil Procedure do not predicate the ability to seek vindication of important rights upon the ability of such plaintiffs to devote enormous amounts of time to finding and reviewing, for the purpose of responding to interrogatories, materials which are “not reasonably accessible due to undue burden or cost.” Fed. R. Civ. P. 26(b)(2)(B). Plaintiff further objects to the Requests to the extent that any one or more of the Requests requires speculation to determine its meaning or imprecisely describes the information sought.

7. Plaintiff objects to the Requests as unduly burdensome to the extent that any one or more of the Requests seeks information that is a matter of public record, is not in Plaintiff’s possession, custody, or control, is already in one or more Defendants’ possession, custody, or control, or is otherwise readily available to one or more Defendants.

8. Plaintiff objects to any one or more of the Requests that fails to specify a relevant period of time. Because the individual Plaintiffs have extensive histories of voting and/or being involved with grassroots organizing and elections in Wisconsin, a Request without a time limitation is overly broad and unduly burdensome.

9. If Plaintiff objects to a particular Request, either through these General Responses and Objections or through a specific objection raised below, but nevertheless responds to the Request in whole or in part, Plaintiff answers subject to and without waiving the specific or General Responses and Objections.

10. Plaintiff reserves the right to object to the admissibility of any information contained in his Responses to the Requests.

11. Plaintiff reserves the right to supplement his answers to all Requests.

INTERROGATORIES

Subject to and without waiving the General Responses and Objections above, Plaintiff responses to Defendants' Interrogatories as follows:

INTERROGATORY NO. 1

Please state the date that you began living in your current residence.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows

- Sept. 2003
- I have lived in Portage City since 1976.

INTERROGATORY NO. 2

For each Wisconsin State Assembly general election since 2002 for which you have lived at your current residence, please state the name and political affiliation of the candidate for whom you voted. If you did not vote in an election, please state as much.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2002: Amy Sue Vruwink (D)
- 2004: Amy Sue Vruwink (D)
- 2006: Amy Sue Vruwink (D)
- 2008: Amy Sue Vruwink (D)
- 2010: Amy Sue Vruwink (D)

- 2012: Amy Sue Vruwink (D)
- 2014: Amy Sue Vruwink (D)
- 2016: Mark Holbrook (D)
- 2018: Cari Fay (D)

INTERROGATORY NO. 3

Identify any candidates for a partisan political office for whom you have voted in the last ten years who was not a Democrat, including the office for which that candidate was running and the year in which the election occurred.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- I've regularly voted for Scott Rifleman (R) for County Coroner over the past 10 years because he's the only candidate in the race.

INTERROGATORY NO. 4

Please describe any political parties or other political organizations of which you are a member, including the name of the organization or party and the date you became a member.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- I consider myself a Democrat, but I am not currently a dues-paying member of any political party or other political organization.

INTERROGATORY NO. 5

Please state whether you have run for partisan political office. If so, please state (a) the office for which you ran; (b) the date of the election; and (c) the outcome of the election.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff has never run for partisan political office.

INTERROGATORY NO. 6

Please describe any donations to candidates for political office, political parties, political action committees, or any other partisan political organization you have made since 2002, including (a) to whom you made the donation; (b) the amount of the donation; and (c) the date you made the donation.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 1, 4, and 6.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- My wife and I have frequently made small (\$20 to \$50) contributions to specific Democratic candidates, to the Democratic Party, and to Democratic political action committees during political campaigns since 2002. We have never contributed to any Republican candidate, to the Republican Party, nor to any Republican political action committee.

- See attached Exhibit A, which includes documents containing Plaintiff's (and his spouse's) donations since 2002. These list to whom the donation was made, the amount of the donation, and the date of the donation.

INTERROGATORY NO. 7

Please describe any other political activity, including volunteering for political campaigns, you have engaged in since 2002, including (a) the nature of the activity; and (b) the date on which you engaged in the activity.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- I have often volunteered to do telephoning, do data entry, and to go door-to-door on behalf of Democratic party candidates since 2002 and on behalf of the effort to recall Governor Scott Walker. I have also written numerous letters to the editor of Wisconsin newspapers on behalf of Democratic candidates and in opposition to Republican candidates for office.
- I became a member of Citizens' Climate Lobby in August 2012. It is a nonpartisan nonprofit attempting to persuade all members of Congress to take climate action. I'm a member, lead the Stevens Point Chapter, and am the volunteer Wisconsin State Coordinator. We have 20 active Wisconsin chapters and several thousand supporters in Wisconsin.

INTERROGATORY NO. 8

Identify the people and/or groups with whom you want to associate but are allegedly burdened in doing so by Act 43.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Generally, other Democrats in my state assembly district, region, and across the state of Wisconsin.

INTERROGATORY NO. 9

Please describe all the ways that act 43 has allegedly impaired “your ability to affiliate with like-minded Democrats and to pursue Democratic associational goals has been impaired by the Current Plan.”

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Response to Interrogatory No. 8. Generally, the Current Plan intentionally discriminates against me because I am a Democrat, disadvantaging me, other Democrats across the state, and the party I support in advocating and implementing preferred policies and achieving various associational goals.
- I have been prevented from electing Wisconsin legislators who advance policies—especially educational and climate policies—that I sincerely believe would benefit our state, nation, and planet because my district has been gerrymandered by Wisconsin’s Republican legislature so that a Democratic candidate cannot win election in it.
- In 2010, when the 70th district was composed of Marathon, Portage, and Wood counties, Democratic incumbent Amy Sue Vruwink won election by a margin of 54% to 46% over Republican John Spiros.
- As the result of the 2011 Republican gerrymander, the 70th legislative district is, appropriately enough, shaped like a two-legged snake, beginning far to the southwest in Sparta in Monroe County and twisting through Jackson County and Wood County until finally arriving in the northeast corner of Portage County in the towns of Dewey and Hull. As a result, Republican Nancy Lynn VanderMeer has won election in the 70th with 53% of the vote in the 2014 election and 62% of the vote in both the 2016 and 2018 elections.
- I’m anxious to move the State of Wisconsin toward action on climate change in light of the severe detrimental effect that climate change is already having in our state. In the last three years we have had at least one 1,000-year flood and several 100-year floods that have resulted in many deaths as well as hundreds of millions of dollars in damage to homes, businesses, agriculture, and infrastructure. Unfortunately, our Republican

governor and legislature have chosen to ignore the climate crisis. This is putting our citizenry and our economy in grave danger.

- Because of the Republican gerrymander, I've been unable to elect and to work with Democratic legislators to remedy this situation, which is so detrimental to the welfare of all Wisconsinites.
- I've also been unable to influence legislators to improve the elementary, secondary, and higher education of Wisconsinites, which has been greatly damaged since the Republican gerrymander.
- All Wisconsinites, not just Republicans, should have the right to influence the decisions made in the Wisconsin legislature.

INTERROGATORY NO. 10

Please describe all the ways in which Act 43 has, as alleged in paragraph 176 of your amended complaint, deterred you or hindered you from “turning out to vote, registering voters, volunteering for campaigns, donation money to candidates, running for office, appealing to independents, and advocating and implementing their preferred policies.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Responses to Interrogatories Nos. 8 and 9.

As to Answers to Interrogatories, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2018.


Daniel D. Frerich

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

All documents you used in preparing responses to the Interrogatories above.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 2, 4, and 5.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibit A for information on Plaintiff's political contributions, as well as Exhibit B for Plaintiff's voter history document from the Wisconsin Election Commission's "My Vote" website.
- Plaintiff also received and reviewed a copy of the Amended Complaint in preparing answers to the above Interrogatories.
- Plaintiff's search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

REQUEST FOR PRODUCTION NO. 2

All documents you intend to use at trial in support of your claims.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff's search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

Respectfully submitted, this 27th day of November, 2018.

As to Objections and Responses to Production Requests,

/s/ Douglas M. Poland
Douglas M. Poland
State Bar No. 1055189
Alison E. Stites
State Bar. No. 1104819
RATHJE WOODWARD, LLC
10 East Doty St., Ste. 507
Madison, WI 53703
(608) 960-7430
dpoland@rathjewoodward.com
astites@rathjewoodward.com

/s/ Ruth M. Greenwood
Ruth M. Greenwood
Annabelle E. Harless
CAMPAIGN LEGAL CENTER
73 W. Monroe St., Ste. 302
Chicago, IL 60603
(312) 561-5508
rgreenwood@campaignlegalcenter.org
aharless@campaignlegalcenter.org

Attorneys for Plaintiffs

[View Receipts](#)

(Plaintiff's Political Donations – Wisconsin Campaign Finance System)



Please Note: The filing period has been defaulted to the current filing period. Users may select a different filing period or none at all. Please choose at least one search filter. **Using multiple search filters will narrow your results.**


| | | | |
|------------------|---|---|-----------------|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name dieterich | First Name d |
| Filing Year | Filing Period Name All Filing Periods | Occupation Title | Committee ID |
| Office | District/County | Branch | |
| Date Range To | Amount Range (\$) <input type="checkbox"/> Out of State Receipts | Receiving Registrant <input type="checkbox"/> Segregated Fund | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contributor Name | Contribution Amount | Address Line1 | Address Line2 | City | State | Zip | Occupation Title | Employer Name | Employer Address | Contributor Type | Receiving Committee | Committee ID | Conduit | Office (Including Branch) | Comments | Segregated Fund Flag | 72 Hr. Reports |
|------------------|-------------------------|--------------------|---------------------|------------------------|---------------|---------------|-------|-------|------------------|---------------|------------------|------------------|-------------------------------|--------------|---------|---------------------------------|----------|----------------------|----------------|
| 09/06/2018 | Fall Pre-Election 2018 | Dieterich, Diane | \$35.00 | 1490 Evergreen Dr | | Stevens Point | WI | 54482 | | | | Individual | Tony for Wisconsin | 0103465 | | Governor | | False | |
| 08/04/2018 | September Report 2018 | Dieterich, Dan | \$31.00 | 1490 Evergreen Dr. | | Stevens Point | WI | 54482 | | | | Individual | Friends of Katrina Shankland | 0105374 | | State Assembly, District No. 71 | | False | |
| 01/02/2018 | July Continuing 2018 | Dieterich, Diane | \$25.00 | 1490 Evergreen Dr. | | Stevens Point | WI | 54482 | | | | Individual | Friends of Katrina Shankland | 0105374 | | State Assembly, District No. 71 | | False | |
| 08/18/2015 | January Continuing 2016 | Dieterich, Diane | \$25.00 | 1490 Evergreen Dr | | Stevens Point | WI | 54481 | | | | Individual | Friends of Katrina Shankland | 0105374 | | State Assembly, District No. 71 | | False | |
| 09/04/2014 | Fall Pre-Election 2014 | Dieterich, Diane | \$35.00 | 1490 Evergreen Dr | | Stevens Point | WI | 54481 | | | | Individual | Assembly Democratic Camp Comm | 0400001 | | | | False | |
| 10/07/2014 | Fall Pre-Election 2014 | Dieterich, Douglas | \$40.00 | 2716 E Milestone Court | | Appleton | WI | 54913 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | | False | |
| 07/07/2014 | Fall Pre-Primary 2014 | Dieterich, Diane | \$25.00 | 1490 Evergreen Drive | | Stevens Point | WI | 54482 | | | | Individual | Burke for Wisconsin | 0105459 | | Governor | | False | |
| 03/03/2014 | July Continuing 2014 | Dieterich, Diane | \$25.00 | 1490 Evergreen Drive | | Stevens Point | WI | 54482 | | | | Individual | Burke for Wisconsin | 0105459 | | Governor | | False | |



View Receipts

| Date | Force Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch | Branch | Flag | Reports |
|------------|---|------------------------|---------|----------------------------|-------|---------------|-------|------------|-------|------|---------|------------|---------------------------------|---------|-------------------|---|-------|---------|
| 07/05/2013 | January Continuing 2014 | Dieterich, Diane | \$30.00 | 1490 Evergreen Dr. | | Stevens Point | WI | 54481 | | | | Individual | Friends of Katrina Shankland | 0105374 | | State Assembly, District No. 71 | False | |
| 06/27/2012 | July Continuing 2012 | Dieterich, Daniel | \$35.00 | 1490 Evergreen Dr | | Stevens Point | WI | 54481 | | | | Individual | Molepske for District Attorney | 0104188 | | Portage County District Attorney | False | |
| 05/30/2012 | July Continuing 2012 | Dieterich, Douglas | \$40.00 | 2716 E Milestone Court | | Appleton | WI | 54913-6706 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 05/11/2012 | Special Pre-Election 2012 (Gov., Lt. Gov., Sen. 13, 21, 23, 29) | Dieterich, David C. | \$25.00 | 15352 W Sierra Vista Drive | | Surprise | AZ | 85374-2090 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 12/14/2011 | January Continuing 2012 | Dieterich, Diane C | \$30.00 | 1490 Evergreen Dr | | Stevens Point | WI | 54482 | | | | Individual | Portage County Democratic Party | 0300144 | |  | False | |
| 08/01/2011 | Recall 30 day report 2011 | Dieterich, David C. | \$25.00 | 15352 W Sierra Vista Drive | | Surprise | AZ | 85374-2090 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 07/14/2011 | Special Pre-Election 2011 (Sen. 2,8,10,14, and Assm. 48) | Dieterich, Donna | \$10.00 | 359 West Maple | | Kahoka | MO | 63445 | | | | Individual | Republican Party of Wisconsin | 0300173 | | | False | |
| 03/07/2011 | Spring Pre-Election 2011 | Dieterich, Dan & Diane | \$30.00 | 1490 Evergreen Drive | | Stevens Point | WI | 54482 | | | | Individual | State Senate Democratic Comm | 0400003 | ActBlue Wisconsin | | False | |
| 06/12/2010 | July Continuing 2010 | Dieterich, Douglas | \$25.00 | 2716 E Milestone Court | | Appleton | WI | 54913-6706 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 05/24/2010 | July Continuing 2010 | Dieterich, Douglas | \$25.00 | 2716 E Milestone Court | | Appleton | WI | 54913-6706 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 11/12/2009 | January Continuing 2010 | Dieterich, Douglas | \$40.00 | 2716 E Milestone Court | | Appleton | WI | 54913-6706 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |
| 05/08/2009 | July Continuing 2009 | Dieterich, Douglas | \$25.00 | 2716 E Milestone Court | | Appleton | WI | 54913 | | | | Individual | Friends of Scott Walker | 0102575 | | Governor | False | |

View Receipts



| Date | Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch | Comments | Year | Flag | Reports |
|------------|----------------------|----------------|---------|-------------------|-------|---------------|-------|-----|-------|------|---------|------------|---------------------------------|---------|--------|----------|------|-------|---------|
| 01/26/2009 | July Continuing 2009 | Dieterich, Dan | \$25.00 | 1490 Evergreen Dr | | Stevens Point | WI | | | | | Individual | Portage County Democratic Party | 0300144 | | | | False | |

Change page: **1** | Displaying page 1 of 1, items 1 to 21 of 21





Military & Overseas Voters

Q Name

Q Address

MY VOTER INFORMATION

Dieterich, Daniel J

Status: You are Registered to Vote!

Update Name

Current Address: 1490 Evergreen Dr , Stevens Point, WI 54482-8998

Update Address

Register to Vote

If you are a military voter, you do not need to register. Click here to get an [absentee ballot](#)

MY NEXT ELECTION

2019 Spring Election

Tuesday, April 2, 2019



Polling Place:

Hull Municipal Building
4550 Wojcik Memorial Dr, Stevens Point, WI 54482

Hours:

7.00 AM - 8.00 PM

[More Information](#)

Town Of Hull - Ward 3

If you were issued a provisional ballot on Election Day, please check your voting activity below to see more information about your provisional ballot.

Would you like to request an absentee ballot for this election?

Request A Ballot

Can't make it to the polls due to age, hospitalization or disability?
[Request an absentee ballot for all elections](#)

MY VOTING ACTIVITY

Aug 14, 2018 - 2018 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, WI 54482

Voting Municipality: Town Of Hull - Portage County

Apr 3, 2018 - 2018 Spring Election

You voted in this election!

Voting Method: Absentee

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Feb 20, 2018 - 2018 Spring Primary

You voted in this election!

Voting Method: Absentee

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 4, 2017 - 2017 Spring Election

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Feb 21, 2017 - 2017 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Nov 8, 2016 - 2016 General Election

You voted in this election!

Voting Method: Absentee

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Aug 9, 2016 - 2016 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 5, 2016 - 2016 Spring Election and Presidential Preference Vote

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Feb 16, 2016 - 2016 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 7, 2015 - 2015 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Nov 4, 2014 - 2014 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Aug 12, 2014 - 2014 FALL PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 1, 2014 - 2014 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 2, 2013 - 2013 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Municipal Building, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Feb 19, 2013 - 2013 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: ,

Voting Municipality: Town Of Hull - Portage County

Nov 6, 2012 - 2012 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Aug 14, 2012 - 2012 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Jun 5, 2012 - 2012 JUNE 5 RECALL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

May 8, 2012 - 2012 MAY 8 RECALL PRIMARY/ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: ,

Voting Municipality: Town Of Hull - Portage County

Apr 3, 2012 - 2012 PRESIDENTIAL PREFERENCE AND SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: 2012 Hull Muni Bldg Wd 1,2,3, 4550 Wojcik Memorial Dr, Stevens Point, Wi 54482

Voting Municipality: Town Of Hull - Portage County

Apr 5, 2011 - 2011 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Feb 15, 2011 - 2011 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Nov 2, 2010 - 2010 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Sep 14, 2010 - 2010 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Apr 6, 2010 - 2010 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Apr 7, 2009 - 2009 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: ,

Voting Municipality: Town Of Hull - Portage County

Nov 4, 2008 - 2008 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: Absentee

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Apr 1, 2008 - 2008 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Feb 19, 2008 - 2008 PRESIDENTIAL PREFERENCE AND SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Apr 3, 2007 - 2007 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Feb 20, 2007 - 2007 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, Wi 54482-8756

Voting Municipality: Town Of Hull - Portage County

Nov 7, 2006 - 2006 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Hull Fire Department, 4818 Wojcik Memorial Dr, Stevens Point, WI 54482-8756

Voting Municipality: Town Of Hull - Portage County

[View My Current Elected Officials](#)



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Contact the State of Wisconsin Elections Commission

Office Address
212 East Washington Ave
3rd Floor
Madison, WI 53703

Mailing Address

P.O. Box 7984 Madison, WI 53707

Phone

Local: (608) 266-8005

Toll-Free: (866) VOTE-WIS

Fax: (608) 267-0500

Email

Elections@wi.gov



Contact Us

Wisconsin Elections Commission

Bring It to the Ballot

Exhibit 5

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

WILLIAM WHITFORD, et al.,

Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants.

THE WISCONSIN ASSEMBLY
DEMOCRATIC CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,

Defendants.

**PLAINTIFF ROGER ANCLAM'S RESPONSE TO DEFENDANTS' FIRST SET OF
INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS**

Plaintiff Roger Anclam ("Plaintiff"), a plaintiff in *Whitford, et al. v. Gill, et al.*, No. 15-cv-421-jdp, by and through his attorneys, responds as follows to Defendants' First Set of Interrogatories and First Set of Requests for Production of Documents to Plaintiff (the "Requests"):

GENERAL RESPONSES AND OBJECTIONS

1. Plaintiff objects to the Requests to the extent that any one or more of the Requests place obligations on Plaintiff that exceed the requirements of the Federal Rules of Civil Procedure and other applicable law.

2. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production of documents or information that are subject to the attorney-client privilege,

work product doctrine, protections for experts employed only for trial preparation, or any other applicable privilege, protection, or immunity from discovery.

3. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks information that is not relevant to the claims or defenses asserted in this litigation, or that is unlikely to lead to the discovery of admissible evidence.

4. Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks information protected by the associational privilege guaranteed by the First and Fourteenth Amendments to the Constitution of the United States, which protects people's right to associate for political, religious, and other reasons without fear of compelled disclosure of those associations. *See, e.g., NAACP v. Ala. ex rel. Patterson*, 357 U.S. 449, 460-61 (1958). The Supreme Court has recognized that such "compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . effective . . . restraint on freedom of association." *Id.* at 462. Plaintiff further objects to the Requests to the extent that any one or more of the Requests seeks to compel the disclosure of contributions to and expenditures by Plaintiff, as such information is protected by the First Amendment. *Brown v. Socialist Workers '74 Campaign Committee*, 459 U.S. 87, 98-99 (1982). Finally, Plaintiff objects to that the Requests to the extent that any one or more of the Requests seeks to identify the author or speaker of anonymous political speech that is also protected by the First Amendment. *See McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 342-43 (1995).

5. Plaintiff objects to the Requests to the extent that any one or more of the Requests seeks the production or disclosure of Plaintiff's personal information that is sensitive or protected by state or federal law, of individuals, without an appropriate protective order in place.

6. Plaintiff objects to the Requests to the extent that any one or more of the Requests is overly broad, unduly burdensome, vague, ambiguous, or confusing. The Federal Rules of Civil

Procedure do not predicate the ability to seek vindication of important rights upon the ability of such plaintiffs to devote enormous amounts of time to finding and reviewing, for the purpose of responding to interrogatories, materials which are “not reasonably accessible due to undue burden or cost.” Fed. R. Civ. P. 26(b)(2)(B). Plaintiff further objects to the Requests to the extent that any one or more of the Requests requires speculation to determine its meaning or imprecisely describes the information sought.

7. Plaintiff objects to the Requests as unduly burdensome to the extent that any one or more of the Requests seeks information that is a matter of public record, is not in Plaintiff’s possession, custody, or control, is already in one or more Defendants’ possession, custody, or control, or is otherwise readily available to one or more Defendants.

8. Plaintiff objects to any one or more of the Requests that fails to specify a relevant period of time. Because the individual Plaintiffs have extensive histories of voting and/or being involved with grassroots organizing and elections in Wisconsin, a Request without a time limitation is overly broad and unduly burdensome.

9. If Plaintiff objects to a particular Request, either through these General Responses and Objections or through a specific objection raised below, but nevertheless responds to the Request in whole or in part, Plaintiff answers subject to and without waiving the specific or General Responses and Objections.

10. Plaintiff reserves the right to object to the admissibility of any information contained in his Responses to the Requests.

11. Plaintiff reserves the right to supplement his answers to all Requests.

INTERROGATORIES

Subject to and without waiving the General Responses and Objections above, Plaintiff responses to Defendants’ Interrogatories as follows:

INTERROGATORY NO. 1

Please state the date that you began living in your current residence.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- September 1995

INTERROGATORY NO. 2

For each Wisconsin State Assembly general election since 2002 for which you have lived at your current residence, please state the name and political affiliation of the candidate for whom you voted. If you did not vote in an election, please state as much.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- 2002: Dan Schoof (D)
- 2004: Chuck Benedict (D)
- 2006: Chuck Benedict (D)
- 2008: Chuck Benedict (D)
- 2010: Roger Anclam (D)
- 2012: Ryan Schroeder (D)
- 2014: I voted in this general election, but not in this race because the Republican candidate ran unopposed.
- 2016: Clinton Anderson (D)
- 2018: Brittany Keyes (D)

INTERROGATORY NO. 3

Identify any candidates for a partisan political office for whom you have voted in the last ten years who was not a Democrat, including the office for which that candidate was running and the year in which the election occurred.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- None.

INTERROGATORY NO. 4

Please describe any political parties or other political organizations of which you are a member, including the name of the organization or party and the date you became a member.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- I consider myself a Democrat, but I am not currently a dues-paying member of any political party or other partisan political organization.

INTERROGATORY NO. 5

Please state whether you have run for partisan political office. If so, please state (a) the office for which you ran; (b) the date of the election; and (c) the outcome of the election.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- (a) State Assembly, (b) November 2010, (c) lost the election.

INTERROGATORY NO. 6

Please describe any donations to candidates for political office, political parties, political action committees, or any other partisan political organization you have made since 2002, including (a) to whom you made the donation; (b) the amount of the donation; and (c) the date you made the donation.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 1, 4, and 6.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A - C, which include documents containing Plaintiff's donations since 2002. These list to whom the donation was made, the amount of the donation, and the date of the donation.
- In addition to the contributions reflected in Exhibits A and B, Plaintiff donated \$300.00 to Brittany Keyes's campaign in 2018.

INTERROGATORY NO. 7

Please describe any other political activity, including volunteering for political campaigns, you have engaged in since 2002, including (a) the nature of the activity; and (b) the date on which you engaged in the activity.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objection No. 4.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff volunteers with the UAW, including doing phone banking, plant gating, and standing on a street corner reminding people to vote almost each year. Plaintiff has also done canvassing and registered voters. Plaintiff has been doing this type of work since 1976.

INTERROGATORY NO. 8

Identify the people and/or groups with whom you want to associate but are allegedly burdened in doing so by Act 43.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Generally, other Democrats in my assembly district, region, and across the state of Wisconsin.
- The districts where I live are so lopsided towards the Republicans that if you are voting for anyone except them your vote is wasted. I have tried to register voters who decline because they feel their vote is wasted. At my local coffee shop, I frequently hear patrons complain about how lopsided the district is and who ask, “why vote?” My nephew who lives in my district has told me that he will not vote because he doesn’t know why he should bother, given that the Republicans will win.
- I have been a member of UAW since 1976. I am the Vice Chair of my local branch. I am active in its Citizenship and Legislative Program. I have been donating approximately \$100.00 each year to UAW since 1979.
- When I engage in political activities on behalf of UAW, I run into the same attitude among my fellow union workers.
- I feel that local Republican office holders are unresponsive to the needs of constituents, because they know they don’t have to work as hard to win. For example, when we recently tried to get constituents to contact our local representative in regards to an initiative, she never responded to the people whom we had urged to contact her office.

INTERROGATORY NO. 9

Please describe all the ways that act 43 has allegedly impaired “your ability to affiliate with like-minded Democrats and to pursue Democratic associational goals has been impaired by the Current Plan.”

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See Response to Interrogatory No. 8. Generally, the Current Plan intentionally discriminates against me because I am a Democrat, disadvantaging myself, Democrats across the state, and the party I support in advocating and implementing preferred policies and achieving various associational goals.

INTERROGATORY NO. 10

Please describe all the ways in which Act 43 has, as alleged in paragraph 176 of your amended complaint, deterred you or hindered you from “turning out to vote, registering voters, volunteering for campaigns, donation money to candidates, running for office, appealing to independents, and advocating and implementing their preferred policies.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See response to Interrogatories Nos. 8 and 9.

As to Answers to Interrogatories, I declare under penalty of perjury that the foregoing is true and correct. Executed on November 27, 2018.


Ross Anclam

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

All documents you used in preparing responses to the Interrogatories above.

RESPONSE: *See generally* General Responses and Objections, and specifically General Objections Nos. 2, 4, and 5.

Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- See attached Exhibits A – C for information on Plaintiff’s political contributions, as well as Exhibit D for Plaintiff’s voter history document from the Wisconsin Election Commission’s “My Vote” website.
- Plaintiff also received and reviewed a copy of the Amended Complaint in preparing answers to the above Interrogatories.
- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

REQUEST FOR PRODUCTION NO. 2

All documents you intend to use at trial in support of your claims.

RESPONSE: Subject to and without waiving the foregoing objections, Plaintiff answers as follows:

- Plaintiff’s search for and collection of responsive, non-privileged documents is ongoing, and Plaintiff will produce additional responsive, non-privileged documents that are located and collected.

Respectfully submitted, this 27th day of November, 2018.

As to Objections and Responses to Production Requests,

/s/ Douglas M. Poland

Douglas M. Poland
State Bar No. 1055189
Alison E. Stites
State Bar. No. 1104819
RATHJE WOODWARD, LLC
10 East Doty St., Ste. 507
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/s/ Ruth M. Greenwood
Ruth M. Greenwood
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aharless@campaignlegalcenter.org

Attorneys for Plaintiffs

(Plaintiff's Political Donations – Wisconsin Campaign Finance System)

[View Receipts](#)



Please Note: The filing period has been defaulted to the current filing period. Users may select a different filing period or none at all. Please choose at least one search filter. **Using multiple search filters will narrow your results.**

| | | | |
|--|---|---|--|
| Contributor Type | Contribution Type | Contributor Last Name/Contributor Business Name/Contributor Committee Name <input type="text" value="anclam"/> | First Name <input type="text" value="roger"/> |
| Filing Year | Filing Period Name All Filing Periods | Occupation Title <input type="text"/> | Committee ID <input type="text"/> |
| Office | District/County | Branch | |
| Date Range <input type="text"/> To <input type="text"/> | Amount Range (\$) <input type="text"/> - <input type="text"/> <input type="checkbox"/> Out of State Receipts | Receiving Registrant <input type="checkbox"/> Segregated Fund | |

To group by column, drag and drop column here

| Transaction Date | Filing Period Name | Contributor Name | Contribution Amount | Address Line1 | Address Line2 | City | State | Zip | Occupation Title | Employer Name | Employer Address | Contributor Type | Receiving Committee | Committee ID | Conduit | Office (Including Branch) | Comments | Segregated Fund Flag | 72 Hr. Reports |
|------------------|-------------------------|------------------|---------------------|---------------------------|---------------|--------|-------|-------|------------------|---------------|------------------|------------------|--------------------------------|--------------|---------|---------------------------------|----------|----------------------|----------------|
| 07/04/2018 | Fall Pre-Primary 2018 | Anclam, Roger | \$100.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | RETIRED | | | Individual | Keyes for Wisconsin | 0106006 | | State Assembly, District No. 31 | | False | |
| 04/29/2018 | July Continuing 2018 | Anclam, Roger | \$100.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | RETIRED | | | Individual | Keyes for Wisconsin | 0106006 | | State Assembly, District No. 31 | | False | |
| 10/26/2015 | January Continuing 2016 | Anclam, Roger | \$100.00 | 7928 S. Butterfly Rd. | | Beloit | WI | 53511 | | | | Individual | Citizens for Zepnick | 0104034 | | State Assembly, District No. 09 | | False | |
| 07/19/2014 | Fall Pre-Primary 2014 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | Retired | | | Individual | Sheridan For Senate | 0104286 | | State Senate, District No. 15 | | False | |
| 06/30/2014 | July Continuing 2014 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | Retired | | | Individual | Sheridan For Senate | 0104286 | | State Senate, District No. 15 | | False | |
| 05/01/2014 | July Continuing 2014 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | Retired | | | Individual | Sheridan For Senate | 0104286 | | State Senate, District No. 15 | | False | |
| 03/23/2014 | July Continuing 2014 | ANCLAM, ROGER | \$50.00 | 7928 S. BUTTERFLY RD | | BELOIT | WI | 53511 | | | | Individual | Ryan J. Schroeder for Assembly | 0103601 | | State Assembly, District No. 31 | | False | |

View Receipts



| Date | Event Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch | Comments | Flag | Reports |
|------------|--------------------------|-----------------|-----------|---------------------------|-------|--------|-------|------------|---------|------|---------|------------|---------------------------------------|---------|---------------------------------|----------|-------|---------|
| 10/31/2012 | January Continuing 2013 | ANCLAM, ROGER B | \$300.00 | 7928 BUTTERFLY RD | | BELOIT | WI | 53511 | RETIRED | | | Individual | Ryan J. Schroeder for Assembly | 0103601 | State Assembly, District No. 31 | | False | |
| 07/29/2012 | Fall Pre-Primary 2012 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511-8909 | | | | Individual | Citizens for Janis Ringhand | 0104291 | State Senate, District No. 15 | | False | |
| 05/06/2012 | July Continuing 2012 | Anclam, Roger | \$60.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | | | | Individual | Democratic Party of Rock County | 0300047 | | | False | |
| 01/28/2011 | July Continuing 2011 | Anclam, Roger | \$35.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | | | | Individual | Democratic Party of Rock County | 0300047 | | | False | |
| 02/18/2012 | Spring Pre-Election 2012 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | RETIRED | | | Individual | Friends of Melissa Sargent | 0105209 | State Assembly, District No. 48 | | False | |
| 10/26/2010 | January Continuing 2011 | Anclam, Roger | \$250.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | | | | Self | Friends For Roger Anclam For Assembly | 0104932 | State Assembly, District No. 45 | | False | |
| 10/08/2010 | Fall Pre-Election 2010 | Anclam, Roger | \$100.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | | | | Individual | Barrett for Wisconsin | 0101475 | Governor | | False | |
| 05/27/2010 | July Continuing 2010 | Anclam, Roger | \$17.50 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | | | | Individual | Democratic Party of Rock County | 0300047 | | | False | |
| 05/08/2010 | July Continuing 2010 | Anclam, Roger | \$25.00 | 7928 S Butterfly Rd | | Beloit | WI | 53511 | | | | Individual | Democratic Party of Rock County | 0300047 | | | False | |
| 04/19/2010 | July Continuing 2010 | Anclam, Roger | \$25.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | | | | Self | Friends For Roger Anclam For Assembly | 0104932 | State Assembly, District No. 45 | | False | |
| 06/30/2010 | July Continuing 2010 | Anclam, Roger | \$4000.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | | | | Self | Friends For Roger Anclam For Assembly | 0104932 | State Assembly, District No. 45 | | False | |
| 06/29/2010 | July Continuing 2010 | Anclam, Roger | \$6000.00 | 7928 South Butterfly Road | | Beloit | WI | 53511 | | | | Self | Friends For Roger Anclam For Assembly | 0104932 | State Assembly, District No. 45 | | False | |

View Receipts



| Date | Name | Name | Amount | Line1 | Line2 | City | State | Zip | Title | Name | Address | Type | Committee | ID | Branch | Comments | Flag | Reports |
|------------|----------------------|---------------|----------|---------------------------|-------|--------|-------|-------|-------|------|---------|------|---------------------------------------|---------|---------------------------------|----------|-------|---------|
| 05/04/2010 | July Continuing 2010 | Anclam, Roger | \$491.37 | 7928 South Butterfly Road | | Beloit | WI | 53511 | | | | Self | Friends For Roger Anclam For Assembly | 0104932 | State Assembly, District No. 45 | | False | |

Change page: 1 | Displaying page 1 of 1, items 1 to 20 of 20



Exhibit B (Plaintiff's Political Donations – Federal Election Commission 2015-16)

Home › Campaign finance data › Advanced data › Individual contributions

Individual contributions

Viewing about 1 filtered results for: [Clear all filters](#)

01/01/2015

-

12/31/2016

Wisconsin

"anclam, roger"

| Contributor name | Recipient | State | Employer | Receipt date | Amount |
|------------------|----------------|-------|----------|--------------|---------|
| ANCLAM, ROGER | <u>ACTBLUE</u> | WI | WRTP | 12/07/2016 | \$25.00 |

Results per page:

0

\$

0

Exhibit C
(Plaintiff's Political Donations – Wisconsin Democracy Campaign)

Search

Clear

16 Contribution(s) Found - **Total Amount Contributed: \$12,166.37**

10 ▼

| Date ▼ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|------------|-----------------|------------------|-------------------|-----------------------------------|-------------------------------|----------|
| 10/26/2015 | Zepnick, Josh | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 07/19/2014 | Sheridan, Mike | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 06/30/2014 | Sheridan, Mike | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 05/01/2014 | Sheridan, Mike | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 10/31/2012 | Schroeder, Ryan | Anclam, Roger B | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$300.00 |
| 10/16/2012 | Schroeder, Ryan | Anclam, Cindy | Beloit, WI, 53511 | Clinton Community School District | Education | \$200.00 |
| 10/02/2012 | Jorgensen, Andy | Anclam, Cindy | Beloit, WI, 53511 | Clinton Community School District | Education | \$100.00 |

| Date ▾ | Contributed To | Contributor Name | City, State, zip | Employer | Interest Category | Amount |
|---------------|-----------------------|-------------------------|-------------------------|-----------------------------------|-------------------------------|---------------|
| 07/29/2012 | Ringhand, Janis | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 07/10/2012 | Schroeder, Ryan | Anclam, Cindy | Beloit, WI, 53511 | Clinton Community School District | Education | \$100.00 |
| 06/01/2012 | Barrett, Tom | Anclam, Cindy B | Beloit, WI, 53511 | Clinton Community School District | Education | \$100.00 |
| 10/26/2010 | Anclam, Roger | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$250.00 |
| 10/08/2010 | Barrett, Tom | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$100.00 |
| 06/30/2010 | Anclam, Roger | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$4,000.00 |
| 06/29/2010 | Anclam, Roger | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$6,000.00 |
| 05/04/2010 | Anclam, Roger | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$491.37 |
| 04/19/2010 | Anclam, Roger | Anclam, Roger | Beloit, WI, 53511 | Town of Turtle Chair | Civil servant/public employee | \$25.00 |

Jump to page

1

JOIN THE DEMOCRACY CAMPAIGN

Exhibit D

(Plaintiff's Voter History 2006-2018)



Military & Overseas Voters

Q Name

Q Address

MY VOTER INFORMATION

Anclam, Roger

Status: You are Registered to Vote!

Update Name

Current Address: 7928 S Butterfly Rd , Beloit, WI 53511-8909

Update Address

Register to Vote

If you are a military voter, you do not need to register. Click here to get an [absentee ballot](#)

MY NEXT ELECTION

2019 Spring Election

Tuesday, April 2, 2019



Polling Place:

Turtle Community Center
6916 S County Road J, Beloit, WI 53511-8964

Hours:

7.00 AM - 8.00 PM

[More Information](#)

Town Of Turtle - Ward 2

**If you were issued a provisional ballot on Election Day,
please check your voting activity below to see more
information about your provisional ballot.**

Would you like to request an absentee ballot for this election?

Request A Ballot

Can't make it to the polls due to age, hospitalization or disability?
[Request an absentee ballot for all elections](#)

MY VOTING ACTIVITY

Nov 6, 2018 - 2018 General Election

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Aug 14, 2018 - 2018 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 3, 2018 - 2018 Spring Election

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 20, 2018 - 2018 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 4, 2017 - 2017 Spring Election

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 21, 2017 - 2017 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 8, 2016 - 2016 General Election

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Aug 9, 2016 - 2016 Partisan Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Lake Town Hall, 1076 3Rd St, Turtle Lake, Wi 54889-8867

Voting Municipality: Town Of Turtle - Rock County

Apr 5, 2016 - 2016 Spring Election and Presidential Preference Vote

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 16, 2016 - 2016 Spring Primary

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 7, 2015 - 2015 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 17, 2015 - 2015 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 4, 2014 - 2014 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Aug 12, 2014 - 2014 FALL PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 1, 2014 - 2014 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 2, 2013 - 2013 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 19, 2013 - 2013 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 6, 2012 - 2012 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Aug 14, 2012 - 2012 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Jun 5, 2012 - 2012 JUNE 5 RECALL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

May 8, 2012 - 2012 MAY 8 RECALL PRIMARY/ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 3, 2012 - 2012 PRESIDENTIAL PREFERENCE AND SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 21, 2012 - 2012 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 5, 2011 - 2011 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 15, 2011 - 2011 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 2, 2010 - 2010 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Sep 14, 2010 - 2010 PARTISAN PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 6, 2010 - 2010 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 7, 2009 - 2009 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 17, 2009 - 2009 SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 4, 2008 - 2008 PRESIDENTIAL AND GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 1, 2008 - 2008 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Feb 19, 2008 - 2008 PRESIDENTIAL PREFERENCE AND SPRING PRIMARY

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Apr 3, 2007 - 2007 SPRING ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

Nov 7, 2006 - 2006 GENERAL ELECTION

You voted in this election!

Voting Method: At Polls

Polling Place: Turtle Community Center, 6916 S County Road J, Beloit, Wi 53511-8964

Voting Municipality: Town Of Turtle - Rock County

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Bring It to the Ballot

Exhibit 6

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

WILLAIM WHITFORD, et al.,

Plaintiffs,

v.

15-cv-421-jdp

BEVERLY R. GILL, et al.,

Defendants.

THE WISCONSIN ASSEMBLY DEMOCRATIC
CAMPAIGN COMMITTEE,

Plaintiff,

v.

18-cv-763-jdp

BEVERLY R. GILL, et al.,

Defendants

Expert Report of Sean P. Trende

I, Sean P. Trende, do hereby declare the following:

1. I am over 18 years of age and am competent to testify regarding the matters discussed in this declaration.
2. My areas of expertise include political history, United States voting laws, redistricting, and the study of campaigns and elections.
3. I am compensated at a rate of \$300 per hour, excluding travel time. All opinions contained in this declaration are offered to a reasonable degree of professional certainty.

EXPERT CREDENTIALS

4. I have studied and followed United States elections on both a part-time and full-time basis for two decades.

5. I received a B.A. from Yale University in 1995, with a double major in history and political science.

6. I received a J.D. from Duke University in 2001.

7. I also received an M.A. from Duke University in 2001, in political science. My coursework was entirely at the graduate level, meaning that I was evaluated under the same expectations as Ph.D. students. As part of this coursework, I took two semesters of graduate level statistics.

8. I am currently enrolled as a doctoral candidate in political science at The Ohio State University. I have passed qualifying examinations in both the American Politics and Political Methodology subfields. I am concurrently enrolled in the Department of Statistics, and am pursuing a Master's Degree in Applied Statistics. Most of my graduate coursework has been in the Department of Statistics, and has included courses in regression analysis, probability theory, non-parametric statistics, survey design and methodology, multivariate analysis, public opinion, redistricting, complex systems, GIS implementation, and experimental design.

9. I joined RealClearPolitics in January of 2009 as their Senior Elections Analyst. I assumed a fulltime position with RealClearPolitics in March of 2010.

10. RealClearPolitics is a company of around 40 employees, with offices in Washington D.C. It produces one of the most heavily trafficked political websites in the world, which serves as a one-stop shop for political analysis from all sides of the political spectrum and is recognized as a pioneer in the field of poll aggregation. It produces original content, including

both data analysis and traditional reporting. It is routinely cited by the most influential voices in politics, including David Brooks of *The New York Times*, Brit Hume of *Fox News*, Michael Barone of *The Almanac of American Politics*, Paul Gigot of *The Wall Street Journal*, and Peter Beinart of *The Atlantic*.

11. My main responsibilities with RealClearPolitics consist of tracking, analyzing, and writing about elections. I collaborate in rating the competitiveness of Presidential, Senate, House, and gubernatorial races. As a part of carrying out these responsibilities, I have studied and written extensively about demographic trends in the country, exit poll data at the state and federal level, public opinion polling, and voter turnout and voting behavior.

12. I am currently the Gerald R. Ford Visiting Scholar at the American Enterprise Institute, where my publications will focus on demographic changes and American elections.

13. As part of familiarizing myself with how parties have drawn lines over the decades, as well as learning the political geography of the United States, I drew, using Adobe Illustrator, complete maps of every congressional district ever drawn, dating back to 1789. These maps were plotted on county maps of each state, tracing over images of maps taken from various Almanacs of American politics, or from my copy of Kenneth Martis' *The Historical Atlas of United States Congressional Districts: 1789-1983* (1982).

14. I served as a Senior Columnist for Dr. Larry Sabato's "Crystal Ball" from January 2014 through the end of 2016. I had to stop writing for the Crystal Ball because schoolwork was taking up too much of my time.

15. I am the author of *The Lost Majority: Why the Future of Government is up For Grabs and Who Will Take It*. The book offers a revisionist take on realignment theory. It argues that realignments are a poor concept that should be abandoned. As part of this analysis, it conducts

a thorough analysis of demographic and political trends beginning around 1920 and continuing through the modern times, and notes the effect that the Democrats' increasingly compact coalition has on their prospects for the House.

16. I also authored a chapter in Dr. Larry Sabato's *Barack Obama and the New America: The 2012 Election and the Changing Face of Politics*, which discussed the demographic shifts accompanying the 2012 elections. I further authored a chapter in Dr. Sabato's *The Surge: 2014's Big GOP Win and What It Means for the Next Presidential Election*, which discusses demographics and Electoral College shifts. I authored a chapter in Dr. Sabato's *Trumped: The 2016 Election That Broke All The Rules*. I authored a chapter in David Schultz and Rafael Jacob's *Presidential Swing States*, covering Ohio politics and its political subdivisions. Finally, I have been asked to author a chapter for Dr. Sabato's forthcoming book on the 2018 elections.

17. I co-authored the 2014 *Almanac of American Politics*. The Almanac is considered the foundational text for understanding congressional districts and the representatives of those districts, as well as the dynamics in play behind the elections. PBS's Judy Woodruff described the book as "the oxygen of the political world," while NBC's Chuck Todd noted that "[r]eal political junkies get two *Almanacs*: one for the home and one for the office." My focus was researching the history of and writing descriptions for many of the newly-drawn districts.

18. I have spoken on these subjects before audiences from across the political spectrum, including at the Heritage Foundation, the American Enterprise Institute, the CATO Institute, the Bipartisan Policy Center, and the Brookings Institution. In 2012, I was invited to Brussels to speak about American elections to the European External Action Service, which is the European Union's diplomatic corps. I was selected by the United States Embassy in Sweden to discuss the 2016 elections to a series of audiences there, and was selected by the United States Embassy in Spain to

fulfil a similar mission this fall. I was invited to present by the United States Embassy in Italy, but was unable to do so because of my teaching schedule. In the winter of 2018, I taught American Politics and the Mass Media at Ohio Wesleyan University. I am currently teaching Introduction to American Politics at The Ohio State University for the second time.

19. It is my policy to appear on any major news outlet that invites me, barring scheduling conflicts, and I have appeared on both Fox News and MSNBC to discuss electoral and demographic trends. I have been cited in major news publications, including *The New York Times*, *The Washington Post*, *The Los Angeles Times*, *The Wall Street Journal*, and *USA Today*.

20. I sit on the advisory panel for the “States of Change: Demographics and Democracy” project. This project is sponsored by the Hewlett Foundation and involves three premier think tanks: The Brookings Institution, the Bipartisan Policy Center, and the Center for American Progress. The group takes a detailed look at trends among eligible voters and the overall population, both nationally and in key states, in an attempt to explain the impact of these changes on American politics, and to create population projections, which the Census Bureau abandoned in 1995. In 2018, I authored one of the lead papers for the project: “In the Long Run, We’re All Wrong,” available at <https://bipartisanpolicy.org/wp-content/uploads/2018/04/BPC-Democracy-States-of-Change-Demographics-April-2018.pdf>.

21. I previously authored an expert report in *Dickson v. Rucho*, No. 11-CVS-16896 (N.C. Super Ct., Wake County), which involved North Carolina’s 2012 General Assembly and Senate maps. Although I was not called to testify, it is my understanding that my expert report was accepted without objection. I also authored an expert report in *Covington v. North Carolina*, Case No. 1:15-CV-00399 (M.D.N.C.), which involved almost identical challenges in a different forum.

22. I authored two expert reports in *NAACP v. McCrory*, No. 1:13CV658 (M.D.N.C.), which involved challenges to multiple changes to North Carolina’s voter laws, including the elimination of a law allowing for the counting of ballots cast in the wrong precinct. I was allowed to testify at trial. My testimony was solely on the “effect” prong of the Voting Rights Act claim. I did not examine the issues relating to intent.

23. I authored reports in *NAACP v. Husted*, No. 2:14-cv-404 (S.D. Ohio), and *Ohio Democratic Party v. Husted*, Case 15-cv-01802 (S.D. Ohio), which dealt with challenges to a variety of Ohio voting laws. I was allowed to testify at trial. The judge in the latter case ultimately refused to consider one opinion, which is not relevant to this report.

24. Although I do not testify in defense of voter identification laws, I served as a trial consultant in *Lee v. Virginia Board of Elections*, No. 3:15-cv-357.

25. I authored an expert report in *Feldman v. Arizona*, No. CV-16-1065-PHX-DLR, which dealt with an attempt to ban the collection of absentee ballots by third parties in Arizona. I had an opinion struck in that case for reasons unrelated to the merits of the opinion; counsel for the state elicited it while I was on the witness stand.

26. I authored expert reports in *A. Philip Randolph Institute v. Smith*, No. 1:18-cv-00357-TSB, and *Common Cause v. Rucho*, NO. 1:16-CV-1026-WO-JEP, which were efficiency gap-based redistricting cases filed in Ohio and North Carolina.

OPINIONS

Dr. Mayer’s Data Show Little Correlation Between Fundraising and the Implementation of Act 43

27. Using the same source as Dr. Mayer, I have recreated the data he uses for fundraising in Wisconsin, with what appear to be rounding errors. However, I have extended the inquiry over the lifespan of the data, which extend back to 1998.

28. Republican Assembly Committee fundraising does improve relative to the Democrats. But this is only correlation, and a rough one at that. Republican fundraising improves in 2014, not 2012 as we might expect with a redistricting-related effect, or as an effect of Republican winning control of the Assembly in 2010. Republican fundraising, relative to the Democrats, was about the same in 2012 as it was in 2006, 2000, and 1998.

Table 1: Republican vs. Democratic Assembly Campaign Fundraising, 1998-2018

| | Year | Democratic Total | Republican Total | Difference | Percentage Democratic |
|----|------|------------------|------------------|----------------|-----------------------|
| 1 | 2018 | \$1,438,377.00 | \$3,014,155.00 | \$1,575,778.00 | 32.30 |
| 2 | 2016 | \$1,673,633.00 | \$1,791,723.00 | \$118,090.00 | 48.30 |
| 3 | 2014 | \$630,166.00 | \$803,342.00 | \$173,176.00 | 44.00 |
| 4 | 2012 | \$624,852.00 | \$349,250.00 | -\$275,602.00 | 64.10 |
| 5 | 2010 | \$922,854.00 | \$294,506.00 | -\$628,348.00 | 75.80 |
| 6 | 2008 | \$863,878.00 | \$321,802.00 | -\$542,076.00 | 72.90 |
| 7 | 2006 | \$551,142.00 | \$269,090.00 | -\$282,052.00 | 67.20 |
| 8 | 2004 | \$605,301.00 | \$241,333.00 | -\$363,968.00 | 71.50 |
| 9 | 2002 | \$295,266.00 | \$130,158.00 | -\$165,108.00 | 69.40 |
| 10 | 2000 | \$263,050.00 | \$164,535.00 | -\$98,515.00 | 61.50 |
| 11 | 1998 | \$445,111.00 | \$247,624.00 | -\$197,487.00 | 64.30 |

29. Moreover, this is at best a correlation. Drawing causal inferences is one of the most difficult tasks in social science, because we are unable to see the counterfactual universe where all other things are equal except the object of the inquiry. In other words, we cannot see what would have happened if everything had been the same in 2014, 2016, and 2018, save for the passage of Act 43. It is uniquely difficult to draw causal inferences on the basis of observational data, as opposed to experimental data, where researchers can randomize observations and impose some sort of control on what is observed. This is not to say that political scientists do not draw these inferences from observational data, but it must be done carefully, and is usually done with some attempt at blocking or other methods of imposing artificial control.

30. One can, of course, always speculate upon the reasons for these types of events. It could be as Dr. Mayer suggests. It could also be that Republicans were aware of the fact that their campaign committee was perpetually outraised by Democrats, and sought to remedy this. It could simply be the Republican campaign committee fundraising advantage coming to reflect advantages in other areas of state fundraising. Whatever the case, we should be careful making statements about causation on the basis of a simple bivariate relationship.

31. The candidate fundraising data illustrate different story. First, the largest Democratic dropoff in fundraising relative to Republicans occurs in 2010, not 2014. Democrats controlled the assembly in the 2010 midterms. One could create an explanation as to why this is the case, but here the simplest explanation would seem to be that fundraising is at least partly a function of overall enthusiasm, and Republican enthusiasm was high going into the 2010 midterms.

32. Moreover, by beginning his inquiry in 2008, Dr. Mayer starts with a high point in Democratic fundraising relative to Republicans. This is entirely expected, given the high amount of Democratic enthusiasm surrounding the 2008 elections and the candidacy of Barack Obama.

Table 2: Republican vs. Democratic Candidate Fundraising, 1998-2016

| | Year | Democratic Total | Republican Total | Difference | Percentage Democratic |
|----|------|------------------|------------------|----------------|-----------------------|
| 1 | 2016 | \$4,065,644.00 | \$4,826,718.00 | \$761,074.00 | 45.70 |
| 2 | 2014 | \$2,562,080.00 | \$4,843,172.00 | \$2,281,092.00 | 34.60 |
| 3 | 2012 | \$3,436,399.00 | \$5,038,191.00 | \$1,601,792.00 | 40.50 |
| 4 | 2010 | \$3,091,446.00 | \$4,365,762.00 | \$1,274,316.00 | 41.50 |
| 5 | 2008 | \$4,325,944.00 | \$4,419,238.00 | \$93,294.00 | 49.50 |
| 6 | 2006 | \$2,447,589.00 | \$3,886,678.00 | \$1,439,089.00 | 38.60 |
| 7 | 2004 | \$2,192,361.00 | \$3,736,585.00 | \$1,544,224.00 | 37.00 |
| 8 | 2002 | \$1,017,245.00 | \$3,057,309.00 | \$2,040,064.00 | 25.00 |
| 9 | 2000 | \$2,226,827.00 | \$4,406,154.00 | \$2,179,327.00 | 33.60 |
| 10 | 1998 | \$1,262,362.00 | \$2,385,481.00 | \$1,123,119.00 | 34.60 |

33. If we extend the inquiry back farther, we see that Republican candidates have historically outraised Democratic candidates in Wisconsin. Indeed, in the late 1990s and early

2000s, well before Act 43, the Republican fundraising advantage for its candidates was larger than it is today.

34. Indeed, the 2016 elections were the second-closest that Democratic candidates in Wisconsin came to Republican fundraising totals over the course of the past ten cycles. If we include the partial 2018 results, Democratic candidates raised 44.8 percent of the total amount of funds raised in 2018, their third-best showing in the past eleven cycles.

35. There are other entities that raise funds in Wisconsin, such as the Democratic and Republican parties themselves. Their fundraising totals over the years are set forth in the following table:

Table 3: Republican vs. Democratic Party Fundraising, 1998-2018

| Year | Democratic Total | Republican Total | Difference | Percentage Democratic |
|------|------------------|------------------|----------------|-----------------------|
| 2018 | \$5,822,347.00 | \$14,161,145.00 | \$8,338,798.00 | 29.10 |
| 2016 | \$3,225,044.00 | \$3,550,022.00 | \$324,978.00 | 47.60 |
| 2014 | \$3,707,032.00 | \$7,591,283.00 | \$3,884,251.00 | 32.80 |
| 2012 | \$5,221,209.00 | \$7,323,083.00 | \$2,101,874.00 | 41.60 |
| 2010 | \$953,233.00 | \$1,080,402.00 | \$127,169.00 | 46.90 |
| 2008 | \$410,837.00 | \$1,114,931.00 | \$704,094.00 | 26.90 |
| 2006 | \$508,343.00 | \$636,200.00 | \$127,857.00 | 44.40 |
| 2004 | \$384,230.00 | \$1,433,188.00 | \$1,048,958.00 | 21.10 |
| 2002 | \$6,239,804.00 | \$5,847,124.00 | -\$392,680.00 | 51.60 |
| 2000 | \$579,658.00 | \$4,367,125.00 | \$3,787,467.00 | 11.70 |
| 1998 | \$1,636,113.00 | \$2,651,076.00 | \$1,014,963.00 | 38.20 |

36. As you can see, the Republican Party of Wisconsin has routinely raised more money than Democrats over the past two decades; in fact, the party's largest advantages in fundraising in percentage terms occurred in 2000 and 2004, well before Act 43. In 2002, Democrats raised a majority of the funds in Wisconsin (as between the two parties); their second-best year in the dataset came in 2016, under the current plan.

37. Indeed, it is not even clear we have correlations worth speaking of for the last two measurements. If we try to test whether there is any difference in the Republican share of

fundraising pre- and post-2010 for assembly committees by using a Wilcoxon test (given the small number of observations), we do find substantial evidence of a correlation (p-value = .01). However, for candidate fundraising and party fundraising – which represents the bulk of the fundraising data in Wisconsin, we find no evidence of a difference between Republican advantages pre- and post-2010. The p-value is .567 for candidate fundraising (not including the 2018 results) and .7879 for committee fundraising.

Dr. Mayer’s Data Show Little Correlation Between Candidate Recruitment and Act 43

38. Dr. Mayer suggests that the large jump in number of uncontested Republican seats in 2016 is a function of the futility of running in districts. Perhaps, but it is by no means obvious that this is the most likely answer. The 2014 elections occurred in a very favorable environment for Republicans, where Barack Obama’s job approval was mired in the low-to-mid 40s. This could have depressed Democratic recruitment, or the environment could have interacted with the map. It is difficult to say, on the basis of these sparse data.

39. As with the fundraising data above, the conclusions become more problematic when we take into account a more complete set of data. I have calculated the number of unopposed Republicans and Democrats for 2000-2018, using data available at elections.wi.gov/elections-voting/results.

Table 4: Uncontested Republicans and Democrats, 2000-2018

| | Year | Uncontested by Ds | Uncontested by Rs |
|----|------|-------------------|-------------------|
| 1 | 2018 | 7 | 29 |
| 2 | 2016 | 21 | 28 |
| 3 | 2014 | 29 | 23 |
| 4 | 2012 | 4 | 23 |
| 5 | 2010 | 17 | 14 |
| 6 | 2008 | 6 | 24 |
| 7 | 2006 | 14 | 25 |
| 8 | 2004 | 21 | 22 |
| 9 | 2002 | 28 | 24 |
| 10 | 2000 | 21 | 20 |

40. In 2018, Democrats left their third-fewest number of seats uncontested in recent years, contesting all but seven of Republican's seats. Republicans, by contrast, left their largest number of seats uncontested in recent years.

41. If we again divide the data up into pre- and post-2012 redistrict sets, and perform a Wilcoxon test on the data, we again find no difference in the number of seats left uncontested by Democrats pre- and post-2012 ($p = .9141$), left uncontested by Republicans pre- and post-2012 ($p = .2381$), or the net difference in seats left uncontested by Republicans and Democrats, pre- and post-2012 redistricting ($p = .4762$).

Dr. Mayer's CCES Data Show Little Effect From the 2012 Redistricting

42. Dr. Mayer is appropriately cautious when interpreting the CCES data. Because of the relative "newness" of the CCES, the data series only date back to 2008. This is problematic for measuring a trend in the data, because 2008 was a year of extremely high Democratic engagement given the candidacy of Barack Obama. The low amount of engagement in 2016 could reflect relatively low enthusiasm among Wisconsin Democrats for the candidacy of Hillary Clinton (as reflected in the presidential results), rather than an effect of an Assembly redistricting plan. As Dr. Mayer appropriately notes, is important to remember here that these are numbers for engaging in *any* political campaign, not merely Assembly campaigns, which makes it all the more unlikely that this is a cause of Act 43.

43. Even non-parametric tests such as the Wilcoxon test become problematic when one approaches very low numbers of observation. It is still worth noting that running a one-sided Wilcoxon test splitting the data into pre-and-post 2012 show no significant effects for any of the data. The p-value is 0.2 for the "attended a local political meeting" question, 0.2 for "put up a political yard sign," 0.6 for the "donated money" question, and 0.2 for the "worked for a candidate

or campaign” question. Again, these p-values should be taken with skepticism, and probably the safest interpretation is that we lack the evidence necessary to draw conclusions about the observed effects of Act 43 on political participation in Wisconsin.

The Effects of Act 43 on Policy Liberalism Are Unclear

44. Finally, Dr. Mayer comments upon the effects of Act 43 on policy liberalism in Wisconsin. It is certainly incontestable that when Republicans gain control of legislatures, the policy agenda becomes more conservative. This is probably all the more true when the governor is someone like former Gov. Scott Walker, an unusually conservative governor by Wisconsin standards.

45. The change in policy liberalism as a result of the 2010 election under the old map (.15 points) is roughly the same as the change from the 2012 to 2013 legislatures (.17 points). The standard deviations for the dataset are large (on the order of .3 points), it is difficult to interpret this movement.

46. We should also put this into some perspective. In the entire Caughey-Warshaw dataset (available at <https://dataverse.harvard.edu/dataset.xhtml?persistentId=doi:10.7910/DVN/ZXZMJB>), the data span roughly a five-point range, from a most liberal score of -2.52545 (Mississippi in 2014) to a most conservative score of 2.81 (California in 2003). The average is roughly zero. Thus, compared to America over the past 80 years, Wisconsin is still a relatively liberal state.

47. Moreover, 2014 is not an unusually conservative year for Wisconsin in recent times. The 1.04 score from 2010 is actually an anomaly; Wisconsin had not been that liberal since 1961. The 0.668 from 2014 is roughly the same degree of liberalism as the state showed in 2006 (.686), 2007 (.608) and 2008 (.634).

48. Even within the 2014 year, Wisconsin ranks as the 34th most liberal state in the country, with roughly the same policy index scores as neighboring Iowa (.607) and Illinois (.915). To put this in further perspective, in 2010, Wisconsin had the 37th most liberal policy index in the country, for a total movement of three ranks. Whatever Act 43 has done, it has not transformed Wisconsin into Mississippi, South Carolina, or Georgia (the most conservative states); indeed it is entirely unclear, given the large standard deviations involved, that Wisconsin has been transformed at all.

Dr. Chen's Maps Do Not Suggest a Zero E.G. Baseline in Wisconsin

49. Dr. Chen produced thousands of computer-drawn random maps of Wisconsin, subject to certain constraints of producing an adequate number of minority-majority districts, compactness, and so forth. He selects a single map that is close to a zero efficiency gap utilizing his metric (in 2012) as his baseline map.

50. Taken as a whole, his maps also suggest that a map drawn free of partisan intent would produce substantial efficiency gaps. In other words, the baseline in Wisconsin is not zero, possibly due to partisan clustering.

51. For example, 95 percent of Dr. Chen's plans have efficiency gaps that fall between -.0171 and -0.097. Using the reduced equation for the efficiency gap that Dr. Jackman defended in the first iteration of this case, this translates to Democrats winning between 49.8 seats (rounded to 50), and 41.8 seats under a neutral map. The median map Dr. Chen's algorithm draws has an efficiency gap of -.0573, while the average map Dr. Chen's algorithm draws has an efficiency gap of -.0565. This would translate to Democrats winning roughly 44 assembly seats under the average or median map.

52. In other words, the range of neutral maps – accepting Dr. Chen’s methodology – would include many situations where Democrats won a majority of the popular vote – perhaps even handily so – but failed to take control of the legislature. Or, put differently, while it is arguably true that a compact map with a certain number of minority-majority districts and few paired incumbents *exists* where Democrats would have gained the legislature, it is not entirely justified to conclude that this would have been the likely outcome of a neutral process. The overwhelming majority of the maps drawn by a neutral process would have resulted in Democrats failing to control the legislature in 2012, even with a random redistricting process.

Districts With A Chen Score Below .5 Elect Republicans

53. Dr. Chen seemingly counts any district with a score above .5 as a Republican win, while any district with a score below .5 counts as a Democratic win. There is obviously something to his approach: Scores above .6 never elect Democrats and scores below .43 never elect Republicans in this decade so far. But, as is apparent from the following table, districts in the middle flip with some regularity.

| | District Number | Chen Metric | 2012 Winner | 2014 Winner | 2016 Winner | 2018 Winner |
|----|-----------------|-------------|-------------|-------------|-------------|-------------|
| 1 | 64 | 0.44 | D | D | D | D |
| 2 | 43 | 0.44 | D | D | D | D |
| 3 | 92 | 0.44 | D | D | R | R |
| 4 | 20 | 0.44 | D | D | D | D |
| 5 | 81 | 0.45 | D | D | D | D |
| 6 | 57 | 0.45 | D | D | D | D |
| 7 | 51 | 0.46 | R | R | R | R |
| 8 | 96 | 0.46 | R | R | R | R |
| 9 | 7 | 0.46 | D | D | D | D |
| 10 | 54 | 0.47 | D | D | D | D |
| 11 | 85 | 0.48 | D | R | R | R |
| 12 | 49 | 0.49 | R | R | R | R |
| 13 | 68 | 0.49 | R | R | R | R |
| 14 | 1 | 0.50 | R | R | R | R |
| 15 | 70 | 0.50 | D | R | R | R |
| 16 | 29 | 0.51 | R | R | R | R |
| 17 | 93 | 0.51 | R | R | R | R |
| 18 | 72 | 0.51 | R | R | R | R |
| 19 | 75 | 0.51 | D | R | R | R |
| 20 | 67 | 0.51 | R | R | R | R |
| 21 | 94 | 0.52 | D | D | D | D |
| 22 | 50 | 0.52 | R | R | R | R |
| 23 | 35 | 0.52 | R | R | R | R |
| 24 | 87 | 0.53 | R | R | R | R |
| 25 | 21 | 0.53 | R | R | R | R |
| 26 | 25 | 0.53 | R | R | R | R |
| 27 | 88 | 0.53 | R | R | R | R |
| 28 | 30 | 0.53 | R | R | R | R |
| 29 | 36 | 0.53 | R | R | R | R |
| 30 | 5 | 0.53 | R | R | R | R |
| 31 | 69 | 0.54 | R | R | R | R |
| 32 | 4 | 0.54 | R | R | R | R |
| 33 | 28 | 0.54 | R | R | R | R |
| 34 | 86 | 0.54 | R | R | R | R |
| 35 | 2 | 0.54 | R | R | R | R |
| 36 | 41 | 0.54 | R | R | R | R |
| 37 | 3 | 0.54 | R | R | R | R |
| 38 | 34 | 0.55 | R | R | R | R |
| 39 | 89 | 0.55 | R | R | R | R |
| 40 | 42 | 0.55 | R | R | R | R |
| 41 | 55 | 0.55 | R | R | R | R |
| 42 | 27 | 0.55 | R | R | R | R |

54. In particular, Republicans win every election under Act 43 with a Chen score above .5 with the exception of seven: Republicans lost District 70 in 2012, in western Wisconsin, where five-term incumbent Amy Vruwink was able to hold on for a term. Republicans lost District 75 in 2012, in rural northwestern Wisconsin, after Republican incumbent Roger Rivard had made

controversial comments about date rape; they won it back in 2014. Republicans routinely lose District 94, near LaCrosse, where incumbent Steve Doyle has continued to win re-election. And Republicans lost District 14, a 60 percent Republican district under the Chen metric, as the voting patterns of the western Milwaukee suburbs begin to change.

55. At the same time, Republicans have had substantial successes winning districts that the Chen metric would suggest are Democratic. Republicans have won roughly half (21 of 44) of the districts that have a Chen metric between .439 and .5, and two-thirds of the districts falling between .4585 and .489. Republicans have won half of the elections in District 92 (Chen metric .4396), and all of the elections in District 51 (.4585), 96 (.4625), 85 (.4773), 49 (.4861) and 68 (.489). All of these districts are located in rural Wisconsin, and most of them are located in southwestern Wisconsin, which is consistent with the trends toward Republicanization of rural Wisconsin that I describe in my initial report.

56. Indeed, looking at the presidential results from 2016, available at <https://docs.google.com/spreadsheets/d/1LZ8fxG1VDbsgquN9i4jG11bt8z0c7O58Phkf4vTioCo/edit#gid=962573040>, we can see that the unpredictability of American elections makes it difficult to project how these gerrymanders will play out over the long term. Dr. Mayer describes District 13 as an overwhelmingly Republican area of Waukesha County, with a Democratic baseline of 32 percent. Yet Hillary Clinton barely lost the district, by a point. The 22nd, 23rd and 24th Districts are described as cracked districts, yet only the 22nd was strongly Republican in 2016. Clinton lost the 24th by 4 points, and actually carried the 23rd by six points. The 29th District is described as a cracked Democratic area with a baseline of 49.5 percent. But Donald Trump carried it by over 15 points, making it more reminiscent of a packed Republican district. Likewise, District 67, which is described as having a Democratic baseline of 48.7 percent looks like a Republican “vote

sink” today, with Donald Trump carrying it by 22 points. District 93, another marginally Republican district under Dr. Chen’s metric, went Republican by 18 points in 2016. Districts 70 and 82 both went for Donald Trump by over 20 points. District 50, a cracked district, went for Trump by 19 points, while District 95, a packed district, went for Clinton by 23.5 points, making them evenly matched today. It is difficult to see how a solid line between packing and cracking is maintained over the course of a redistricting map’s lifespan.

57. To get a sense of the true relationship between the Chen Metric and Republican chances of winning a district, we can perform logistic regression analysis, with the Chen metric as the predictor and a dummy variable with one indicating a Republican win as the response.

Table 5: Logistic Regression Coefficients, 2012 Election

| | <i>Dependent variable:</i> |
|-------------------|-----------------------------|
| | x2012 |
| Chen_Metric | 61.643*** (14.848) |
| Constant | -29.748*** (7.310) |
| Observations | 99 |
| Log Likelihood | -13.818 |
| Akaike Inf. Crit. | 31.635 |
| <i>Note:</i> | *p<0.1; **p<0.05; ***p<0.01 |

58. The Chen metric is clearly related to Republican performance, but the “break even point” for Republicans winning a district lies below 50 percent. The following table illustrates Republican probabilities of winning districts by various levels of the Chen metric:

Table 6: Republican Win Probabilities Under Various Chen Metrics

| Chen Metric | Republican Prob |
|-------------|-----------------|
| 0.4 | 0.6% |
| 0.405 | 0.8% |
| 0.41 | 1.1% |
| 0.415 | 1.5% |
| 0.42 | 2.1% |
| 0.425 | 2.8% |
| 0.43 | 3.8% |
| 0.435 | 5.0% |
| 0.44 | 6.7% |
| 0.445 | 8.9% |
| 0.45 | 11.8% |
| 0.455 | 15.4% |
| 0.46 | 19.9% |
| 0.465 | 25.2% |
| 0.47 | 31.4% |
| 0.475 | 38.4% |
| 0.48 | 45.9% |
| 0.48265 | 50.0% |
| 0.485 | 53.6% |
| 0.49 | 61.1% |
| 0.495 | 68.2% |
| 0.5 | 74.5% |
| 0.505 | 79.9% |
| 0.51 | 84.4% |
| 0.515 | 88.0% |
| 0.52 | 90.9% |
| 0.525 | 93.2% |
| 0.53 | 94.9% |
| 0.535 | 96.2% |
| 0.54 | 97.2% |

59. Thus, Republicans become favorites at a Chen Metric of roughly .48265. If we apply this cutpoint to Plan 43995, we would actually expect Republicans to be favored in 57 seats under that plan. This is not unexpected, as Republicans' baseline position in the state has likely improved since the 2004 to 2010 timeframe.

60. Notably, this cutpoint also shifts over time. Using the 2014 election results, Republicans would be expected to win once the Chen metric rose above .4702. Using the 2016 election results, Republicans would be expected to win once the Chen metric rose above .4653. Using the 2018 election results, Republicans would be expected to win a district once the Chen metric rose above .4675.

61. If we use these cutoffs instead, Republicans would be expected to be favorites in 60 seats in 2014, 2016, and 2018 under Plan 43995.

62. These give some perspective to the plaintiffs' chances of winning under the simulated plans. For many of them, Republicans would still be strongly favored to win their districts, or Democrats would remain packed in heavily Democratic districts.

63. Plaintiff Graham Adsit lives in District 8 of Simulated Plan 43995. A Republican would have had a 30 percent chance of winning this district in 2018.

64. Plaintiff Roger Anclam lives in District 45 of Simulated Plan 43995. A Republican would have had a 17 percent chance of winning this district in 2018.

65. Plaintiff William Braun lives in District 40 of Simulated Plan 43995. A Republican would have had a 56.1 percent chance of winning this district in 2018.

66. Plaintiff Hans Breitenmoser lives in District 76 of Simulated Plan 43995. A Republican would have had a 78 percent chance of winning this district in 2018.

67. Plaintiff Judith Brey lives in District 75 of Simulated Plan 43995. A Republican would have had a 68.5 percent chance of winning this district in 2018.

68. Plaintiff Sandra Carlson-Kaye lives in District 15 of Simulated Plan 43995. A Republican would have had a 4 percent chance of winning this district in 2018.

69. Plaintiff Guy Costello lives in District 8 of Simulated Plan 43995. A Republican would have had a 61.7 percent chance of winning this district in 2018.

70. Plaintiff Graham Adsit lives in District 8 of Simulated Plan 43995. A Republican would have had a 30 percent chance of winning this district in 2018.

71. Plaintiff Timothy B. Daley lives in District 16 of Simulated Plan 43995. A Republican would have had a 38.7 percent chance of winning this district in 2018.

72. Plaintiff Dieterich lives in District 60 of Simulated Plan 43995. A Republican would have had a 9 percent chance of winning this district in 2018.

73. Plaintiff Donohue lives in District 1 of Simulated Plan 43995. A Republican would have had a 72.9 percent chance of winning this district in 2018.

74. Plaintiff Dudley lives in District 2 of Simulated Plan 43995. A Republican would have had almost no chance of winning this district in 2018.

75. Plaintiff Estrada lives in District 70 of Simulated Plan 43995. A Republican would have had a 80.8 percent chance of winning this district in 2018.

76. Plaintiff Flom lives in District 86 of Simulated Plan 43995. A Republican would have had an 80 percent chance of winning this district in 2018.

77. Plaintiff Harris lives in District 72 of Simulated Plan 43995. A Republican would have had almost no chance of winning this district in 2018.

78. Plaintiff Hohenstein lives in District 96 of Simulated Plan 43995. A Republican would have had a 64 percent chance of winning this district in 2018.

79. Plaintiff Lentini lives in District 5 of Simulated Plan 43995. A Republican would have had a 1.2 percent chance of winning this district in 2018.

80. Plaintiffs McCue and Mitchell live in District 44 of Simulated Plan 43995. A Republican would have had a 19.1 percent chance of winning this district in 2018.

81. Plaintiff Patel lives in District 18 of Simulated Plan 43995. A Republican would have had almost no chance of winning this district in 2018.

82. Plaintiff Pedersen lives in District 86 of Simulated Plan 43995. A Republican would have had an 80 percent chance of winning this district in 2018.

83. Plaintiff Petulla lives in District 91 of Simulated Plan 43995. A Republican would have had an 82 percent chance of winning this district in 2018.

84. Plaintiff Pfundheller lives in District 82 of Simulated Plan 43995. A Republican would have had a 36.7 percent chance of winning this district in 2018.

85. Plaintiff Ramaker lives in District 37 of Simulated Plan 43995. A Republican would have had an 80.2 percent chance of winning this district in 2018.

86. Plaintiff Schnick lives in District 59 of Simulated Plan 43995. A Republican would have had a 34 percent chance of winning this district in 2018.

87. Plaintiffs Seaton live in District 87 of Simulated Plan 43995. A Republican would have had a 74.83 percent chance of winning this district in 2018.

88. Plaintiffs Sundstrom, Switzenbaum and Wallace live in District 5 of Simulated Plan 43995. A Republican would have had a 1.2 percent chance of winning this district in 2018.

89. Plaintiffs Wohl and Wolfe live in District 21 of Simulated Plan 43995. A Republican would have had a 35 percent chance of winning this district in 2018.

Map 43995 Produces Wide Swings In Election Outcomes

90. While Dr. Chen's map produces a roughly zero efficiency gap at "baseline," it is apparent from his Figure 3 that years that are marginally better for Republicans – or worse – produce substantial deviations in outcomes. Republicans improving by one point over baseline would result in an efficiency gap of just under .075. In other words, it would create almost as many wasted votes as an actionable map designed with partisan intent.

91. For example, if Republicans were to drop five points below the baseline, Democrats would enjoy a 71-28 advantage in the Assembly. Using 48.265 as the cutoff, that would be a 67-32 Democratic advantage. A five-point swing the other direction would result in 70-29 and 75-24 Republican majorities, utilizing the respective baselines.

92. The following table shows the number of seats Republicans would be expected to win utilizing different baselines calculated above, given a certain swing. Using Dr. Chen’s cutoff of 50 percent, Republicans could win between 38 and 58 seats in the Assembly, given a two-point swing in either direction. Using the 2012 baseline estimated above, we would expect Republicans to win between 47 and 62 seats based off of a two point swing. Notably, using the 2016 and 2018 baselines, a slight deviation in either direction still results in Republican majorities, potentially extending into the 70s.

Table 7: Seats Won By Republicans Using Various Uniform Swings, Using Chen Metric

| Swing: | -5 | -4 | -3 | -2 | -1 | 0 | 1 | 2 | 3 | 4 | 5 |
|------------|----|----|----|----|----|----|----|----|----|----|----|
| 50 Percent | 28 | 32 | 32 | 38 | 41 | 47 | 55 | 58 | 61 | 62 | 70 |
| 2012 | 32 | 37 | 39 | 47 | 54 | 57 | 60 | 62 | 70 | 73 | 75 |
| 2014 | 38 | 41 | 47 | 55 | 58 | 60 | 62 | 70 | 73 | 77 | 77 |
| 2016 | 39 | 46 | 53 | 56 | 59 | 60 | 66 | 73 | 75 | 77 | 78 |
| 2018 | 38 | 42 | 51 | 56 | 59 | 60 | 63 | 72 | 74 | 77 | 77 |

Dr. Chen Does Not Take Account of Incumbency

93. It is important to recall that the enhanced ability of incumbents to retain seats for their parties is “perhaps the most well-known feature of contemporary legislative elections.” Ken Mayer, Analysis of the Efficiency Gaps of Wisconsin's Current Legislative District Plan and Plaintiffs’ Demonstration Plan,” July 3, 2015. Yet analysis of incumbency advantage is missing from Dr. Chen’s metric. This is important, because, as a result of the 2010 midterm elections, Republicans had more incumbents running than Democrats.

94. It is difficult to estimate the precise effects of incumbency here, for two reasons. First, we cannot untangle the counterfactual problem. Some Democrats who opted to retire or run for different office probably would have run under this map, and the same is true for Republicans. The converse is also true: Some Republicans who ran in 2012 would have retired. Second, it is difficult to estimate the effect of Democratic incumbency. Including Democrats in the regression

analysis does not return a significant value or substantially reduce the residual deviance of the model, unlike including Republicans; this could be a result of high numbers of unopposed Democratic candidates.

95. Regardless, if we include the presence of a Republican incumbent, we return the following model:

| | <i>Dependent variable:</i> |
|-------------------|-----------------------------|
| | x2012 |
| Chen_Metric | 39.317*** (9.934) |
| R_Inc | 1.710* (0.966) |
| Constant | -19.004*** (4.740) |
| Observations | 99 |
| Log Likelihood | -16.742 |
| Akaike Inf. Crit. | 39.484 |
| <i>Note:</i> | *p<0.1; **p<0.05; ***p<0.01 |

96. Estimating the 2012 results (using Dr. Chen's placement of Republican incumbents), we would expect that Republicans would be favored in 65 districts. Again, this is complicated by the lack of consideration for Democratic incumbency. But Democrats only have incumbents running in five districts where Republicans are favored under the model; Republican probability of success is defined as 63.5 percent, 71.3 percent, 72.2 percent, 81.9 percent, and 96.7 percent in those districts. Even assuming that Democrats were to win all five, we would still expect for Republicans to be favored in 60 districts as a baseline under this plan.

97. Of course, there are many other ways we could estimate the 2018 elections. I chose this metric because it most clearly tracks the data plaintiffs seemingly wish the Court to draw inferences from.

Conclusion

98. Estimating the partisan effects of Act 43 is an enormously difficult task. It is difficult to know how this law affected fundraising, recruitment, and the ideological direction of the legislature, to say nothing of the effect on Democrats' chances in individual districts. Elections are enormously complicated events, which political scientists frequently struggle to unravel. The conclusions presents by plaintiffs' experts should be approached with caution, as substantial uncertainty surrounds them.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

This the 17th day of December, 2018.



Sean P. Trende

Exhibit 7

Monday, June 10, 2019 at 9:43:02 AM Central Daylight Time

Subject: Re: Scheduling order clarification

Date: Friday, June 7, 2019 at 6:27:43 PM Central Daylight Time

From: Adam Mortara

To: Ruth Greenwood

CC: External User - Kevin St John, Joshua Ackerman, Taylor Meehan, Brian Keenan, Karla Keckhaver, Clayton Kawski, Doug Poland, Mark Gaber, Gerry Hebert, Annabelle Harless, Nicholas Stephanopoulos, Cecilia Aguilera, Urja Mittal, Lernik Begian

The more we can push into July the better! Maybe we won't have to do any of it! Like the Vos deposition!

Have a great weekend!!!

Sent from my iPhone

On Jun 7, 2019, at 18:25, Ruth Greenwood <rgreenwood@campaignlegalcenter.org> wrote:

Counsel

Our 26(a)(3) disclosures are due to the Court on Friday June 14. Some aspects of that are relatively straightforward (deposition designations, witness lists), but I had two questions for you about the exhibit list:

1. Given that we previously had plaintiffs use numbers 1-500, and defendants use 500 and up, we propose that the new exhibits start with plaintiffs using numbers 1000-1,999 and defendants use 2000-2,999 (unless you want to split numbers between the sets of defendants, then you could have the Elections Commission use 2,000-2,999, and the Assembly use 3000-3,999). Let us know what works for you.
2. The updated scheduling order (Dkt. 248) does not specify that the parties must share copies of their proposed exhibits with the other parties on June 14, but we do have to lodge objections by June 21. Given this, we propose that all parties share (via online file sharing) copies of their proposed exhibits on June 14.

Can you let us know if you agree to these suggestions? If not, we will call the clerk and ask for further direction from the Court.

Additionally, no date is listed by the Court in the updated scheduling order for when we should share with each other our proposed stipulated facts. The Court has asked for these to be filed with it by July 8, so we propose that all parties share their proposed stipulated facts by July 1, and we schedule a meet and confer that week to determine which facts, if any, we can all stipulate to. If this does not suit, please propose an alternative arrangement.

Ruth

Ruth Greenwood

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