

Ann Stevning-Roe

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN  
\* \* \* \* \*  
WILLIAM WHITFORD, et al.,  
Plaintiffs,  
vs. Case No. 15-CV-421-JDP  
BEVERLY R. GILL, et al.,  
Defendants.  
\* \* \* \* \*

THE WISCONSIN ASSEMBLY DEMOCRATIC CAMPAIGN  
COMMITTEE,  
Plaintiff,  
vs. Case No. 18-cv-763-JDP  
BEVERLY R. GILL, et al.,  
Defendants,

\* \* \* \* \*

VIDEOTAPED DEPOSITION OF ANN STEVNING-ROE  
TAKEN AT: Klemish & Johnson, LLC  
LOCATED AT: 826 South Hastings Way  
Eau Claire, WI  
January 23, 2019  
8:58 a.m. to 10:37 a.m.

REPORTED BY ANITA KORNBURGER  
REGISTERED PROFESSIONAL REPORTER

\* \* \* \* \*

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1 APPEARANCES  
 2 CAMPAIGN LEGAL CENTER, by  
 3 Annabelle Harless, Esquire  
 4 73 West Monroe Street, Suite 302  
 5 Chicago, IL 60603  
 6 312-561-5508  
 7 aharless@campaignlegalcenter.org  
 8 Appearing on behalf of the Plaintiffs.  
 9 STATE OF WISCONSIN, DEPARTMENT OF JUSTICE, by  
 10 Karla Z. Keckhaver, Esquire  
 11 17 West Main Street  
 12 Madison, WI 53707-7857  
 13 608-264-6365  
 14 keckhaverkz@doj.state.wi.us  
 15 Appearing on behalf of the Defendants.  
 16  
 17 INDEX  
 18 Examination by Page  
 19 Ms. Keckhaver. . . . . 4  
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 21 EXHIBITS  
 22 Page  
 23 Exhibit No. Description Identified  
 24 58 Answers to interrogatories. . . 52  
 25 (Original exhibits attached to original transcript. Copies provided to all counsel.)

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1 TRANSCRIPT OF PROCEEDINGS  
 2 THE VIDEOGRAPHER: Good morning. We are  
 3 on the record. My name is Jon Hansen, CLVS, and I  
 4 am the videographer with Golkow Litigation  
 5 Services. Today's date, January 23, 2019, and the  
 6 time is 8:58. This deposition is being held in Eau  
 7 Claire, Wisconsin, in the matter of William  
 8 Whitford, et al., versus Beverly R. Gill, et al.,  
 9 and the Wisconsin State Assembly, United States  
 10 District Court, Western District of Wisconsin, case  
 11 number 15-CV-00421 JDP, in the matter of the  
 12 Wisconsin Assembly Democratic Campaign Committee  
 13 versus Beverly R. Gill, et al., and the Wisconsin  
 14 State Assembly, United States District Court,  
 15 Western District of Wisconsin, case number  
 16 18-CV-00763 JDP.  
 17 The deponent this morning is Ann  
 18 Stevning-Roe. At this time if counsel could please  
 19 state their appearance for the record, after which  
 20 our reporter will swear in the witness and we can  
 21 proceed.  
 22 MS. HARLESS: Annabelle Harless  
 23 representing the Whitford plaintiffs and  
 24 Ms. Stevning-Roe, from the Campaign Legal Center in  
 25 Chicago.

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1 MS. KECKHAVER: Assistant attorney  
 2 general Karla Keckhaver appearing on behalf of the  
 3 defendants.  
 4 ANN STEVNING-ROE, called as a witness  
 5 herein, having been first duly sworn on oath, was  
 6 examined and testified as follows:  
 7 EXAMINATION  
 8 BY MS. KECKHAVER:  
 9 Q. Morning.  
 10 A. Good morning.  
 11 Q. I know we just met, but I'm Karla  
 12 Keckhaver from the attorney general's office.  
 13 Could you state your name, please?  
 14 A. Ann Stevning-Roe.  
 15 Q. And what is your address?  
 16 A. 209 South Columbus Drive, Marshfield,  
 17 Wisconsin.  
 18 Q. What's your occupation?  
 19 A. I'm an attorney.  
 20 Q. So fair to say you're familiar with the  
 21 process for depositions?  
 22 A. Yes.  
 23 Q. Okay. So just one reminder is that it's  
 24 important for us not to talk over each other so the  
 25 court reporter can get everything down. But you

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1 probably know all that.  
 2 A. I have not been a deponent, so this chair  
 3 is different for me.  
 4 Q. It can be tricky to not talk over each  
 5 other, but we'll -- we'll do our best. And you  
 6 understand that you're under oath today?  
 7 A. Correct.  
 8 Q. And let us know if you need a break.  
 9 A. Okay.  
 10 Q. We can do that, but this shouldn't take  
 11 terribly long. How long have you been a lawyer?  
 12 A. It'll be 35 years in June.  
 13 Q. And what kind of law do you practice?  
 14 A. I do general practice. About 50 percent  
 15 family law and estate planning, guardianships,  
 16 guardian ad litem work.  
 17 Q. And this is in Marshfield, Wisconsin?  
 18 A. Yes.  
 19 Q. And do you work -- have your own law firm  
 20 or --  
 21 A. I do now. I was with partners who have  
 22 since retired.  
 23 Q. Where was that?  
 24 A. In Marshfield at the same address, 214  
 25 West Fifth Street.

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1 Q. And have you ever practiced at any other  
 2 law firm?  
 3 A. No, just different entities in the same  
 4 place.  
 5 Q. Okay. You moved to your current  
 6 residence in 1992; is that correct?  
 7 A. Yes.  
 8 Q. And where did you live before that?  
 9 A. 808 South Ash, in Marshfield.  
 10 Q. Have you ever run for public office?  
 11 A. No.  
 12 Q. And why is that?  
 13 A. The time away from my work and the stress  
 14 on family members has kept me from being interested  
 15 in running for office.  
 16 Q. Any other reason?  
 17 A. No, not that I can think of.  
 18 Q. Okay. Have you ever been a party in  
 19 litigation before?  
 20 A. Yes.  
 21 Q. And what kind of case was that?  
 22 A. My former partner sued us.  
 23 Q. What did he or she sue over?  
 24 A. He claimed, or through his wife, who was  
 25 his POA, or power of attorney, claimed that the

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1 partnership agreement was unfair to him and our  
 2 split up of the business.  
 3 Q. What was the outcome of that case?  
 4 A. We settled it with a receiver.  
 5 Q. Are you a regular voter,  
 6 Ms. Stevning-Roe?  
 7 A. Yes, I am.  
 8 Q. Since when?  
 9 A. Since 18, basically. I even was a poll  
 10 watcher at 17-and-a-half.  
 11 Q. Okay. Have you voted in every election,  
 12 would you say?  
 13 A. There may have been some local elections  
 14 or off-year elections that I missed, but I don't  
 15 think I've missed very many.  
 16 Q. Do you remember the circumstances?  
 17 A. No, I don't. I don't -- I think I voted  
 18 almost every time, but I --  
 19 Q. Do you vote in general elections?  
 20 A. Yes.  
 21 Q. And do you vote in the primary elections?  
 22 A. I do.  
 23 Q. Did you vote in the 2008 presidential  
 24 primary?  
 25 A. Yes.

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1 Q. And who did you vote for?  
 2 A. Hillary Clinton.  
 3 Q. Why did you vote for Ms. Clinton?  
 4 A. I liked the policies of both Hillary  
 5 Clinton and Barack Obama, but I wanted to vote for  
 6 a woman. And I agreed with some of her positions  
 7 and at the time perceived her as being a viable  
 8 candidate.  
 9 Q. What was it in particular over Mr. Obama  
 10 that you -- that you liked?  
 11 A. Probably gender. I thought it was good  
 12 to have a woman.  
 13 Q. And were there any policies of hers that  
 14 you liked more than Mr. Obama's?  
 15 A. Their policies were very similar, so I  
 16 don't think that that was a decision point for me,  
 17 that I can recall.  
 18 Q. How about her experience?  
 19 A. Her experience. But I thought they both  
 20 had good experience and background.  
 21 Q. What about the 2016 presidential primary?  
 22 A. Yes.  
 23 Q. Did you vote in that?  
 24 A. Yes, I did.  
 25 Q. Who did you vote for there?

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1 A. Hillary Clinton.  
 2 Q. And what was the reason for voting for  
 3 her over Bernie Sanders?  
 4 A. I perceived her as being the more viable  
 5 candidate. And again, I wanted to support a female  
 6 candidate and --  
 7 Q. Would you say --  
 8 A. -- I also thought that there were issues  
 9 with Bernie Sanders having been a non-Democratic  
 10 party member that weakened him when it would come  
 11 to a final vote.  
 12 Q. What do you mean by that?  
 13 A. He's an independent, and so he wanted to  
 14 lead the party that he chose not to belong to.  
 15 Q. When you say Ms. Clinton was more viable,  
 16 what do you mean by that?  
 17 A. I perceived her as being someone who  
 18 would be more likely to win in the general  
 19 election.  
 20 Q. You mentioned that for Mr. Sanders you --  
 21 you didn't like the fact that he was a  
 22 non-Democrat.  
 23 A. Correct.  
 24 Q. And do you always vote for Democrats?  
 25 A. I vote for Democrats most of the time in

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1 statewide and national elections, yes.  
2 Q. Do you vote in the primary for assembly  
3 candidates?  
4 A. When there is a choice, yes.  
5 Q. Has anyone ever prevented you from  
6 voting?  
7 A. No.  
8 Q. And do you have any reason to believe  
9 that your vote hasn't been counted?  
10 A. It depends upon what you mean as  
11 counting. Counting the votes themselves, yes,  
12 they've been counted. Having an effect, I think  
13 that there has been a detriment to the effect of my  
14 vote.  
15 Q. Okay. What do you mean by that?  
16 A. Since the redistricting, my vote has been  
17 of less meaning and effect in assembly, state  
18 senate, and congressional races.  
19 Q. Have you ever voted for a candidate who  
20 was not a Democrat?  
21 A. In local county elections, I have. And I  
22 supported John Anderson as an independent, a former  
23 Republican in northern Illinois. So that would  
24 have been I think '76 or earlier.  
25 Q. What other non-Democrats have you voted

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1 for?  
2 A. That would be about it. Some of the  
3 local county races, and then John Anderson.  
4 Q. And I know these are in your  
5 interrogatory responses that we're going to go  
6 over. Do you remember any of those local county  
7 races that you voted for a non-Democrat?  
8 A. Yes. I voted for Cindy Joosten, who is  
9 our clerk of courts in Wood county. And when Todd  
10 Wolf was running as district attorney, I voted for  
11 Todd Wolf and Craig Lambert. And I think the  
12 registrar, the register of deeds.  
13 Q. Okay. You mentioned Cindy Joosten for  
14 clerk of court. And why did you vote for her?  
15 A. Because she is an able administrator of  
16 the clerk of courts office. I don't think of that  
17 as a partisan office, really. They -- they have a  
18 party affiliation, but they're not voting on issues  
19 politically.  
20 Q. Did she have a Democratic challenger,  
21 that you know?  
22 A. I don't believe she did in the last  
23 election. I don't remember the prior ones. She  
24 had a challenger in the primary in the last  
25 election, but not the general election.

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1 Q. And how many times did you vote for  
2 Ms. Joosten?  
3 A. Probably three times that I can recall.  
4 I did try to note them all down in my responses.  
5 So if -- that would be accurate from --  
6 Q. Yeah. And as I said, we'll look at  
7 those. Does she identify herself as a Republican?  
8 A. Yes, she does.  
9 Q. Okay. So you thought she was an able  
10 administrator. Any other reason you voted for her?  
11 A. That would be the biggest one. Because  
12 working as the clerk of courts, she affects my  
13 work, and so I want someone there who is a good  
14 administrator for the office.  
15 Q. Did you know her personally?  
16 A. I've gotten to know her through my work  
17 and her work, yes.  
18 Q. Was part of the reason you voted for her  
19 because you'd seen her do the job?  
20 A. Yes.  
21 Q. All right. How about Todd Wolf, the  
22 district attorney, how many times did you vote for  
23 him?  
24 A. I think once, maybe twice. I would have  
25 recorded them in the responses. And I believe he

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1 was unopposed both times.  
2 Q. And why did you vote for him?  
3 A. Well, for one thing, he didn't have  
4 opposition. But secondly, I thought Todd was a  
5 good district attorney. He helped implement a drug  
6 court. I don't do any criminal law, so I didn't  
7 come in contact with him on a regular basis, but he  
8 implemented some policies with the drug court that  
9 I thought were favorable to members of the  
10 community.  
11 Q. Any other reasons that you voted for him?  
12 A. Like I said, he was unopposed, so --  
13 Q. Did you know him personally?  
14 A. I know him a bit through the county bar.  
15 But since I don't do criminal work, I didn't know  
16 him as well. Since he became judge, I have more  
17 contact with him now.  
18 Q. So you mentioned, well, he was unopposed,  
19 you mentioned that you thought he was a good  
20 district attorney, you liked the drug court and  
21 some of his policies. Any other reason that you  
22 voted for him?  
23 A. Nope, not that I can think of.  
24 Q. Okay. And then Craig Lambert, who is  
25 that?

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1 A. He is the district attorney currently.  
2 Q. And he identifies himself as a  
3 Republican?  
4 A. Yes.  
5 Q. And why did you vote for him?  
6 A. Again, he was unopposed. And I think  
7 Craig does a good job as district attorney. Again,  
8 I don't think of those offices as being greatly  
9 partisan. They're not voting on issues that affect  
10 our community as much.  
11 Q. Uh-huh. Any policies that Mr. Lambert  
12 supported that you liked?  
13 A. He carried forward the drug court, which  
14 Todd didn't do that himself, it was also with Judge  
15 Dappen. They did that together. But Craig has  
16 carried that forward.  
17 Q. And again, did you know Mr. Lambert  
18 personally?  
19 A. No, not really, 'cause I don't do any  
20 criminal work. I know him to say hi to him in the  
21 hallway, to -- but that's about it.  
22 Q. Sure. Then you mentioned the registrar.  
23 Who is -- do you remember who that was?  
24 A. Susan Ginter. I think that's how you say  
25 her name.

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1 Q. And how many times did you vote for her?  
2 A. Two or three. I tried to record them all  
3 in my responses. Previously she had worked in the  
4 clerk of courts office, and I'd gotten to know her  
5 through the clerk of courts office, and she was an  
6 able administrator.  
7 Q. Any other reason you voted for her?  
8 A. Not that I can think of. I believe she  
9 was also unopposed.  
10 Q. But you knew her personally through the  
11 clerk of courts office?  
12 A. Correct.  
13 Q. Do you consider yourself an informed  
14 voter?  
15 A. Yes, I do.  
16 Q. And what do you do to inform yourself of  
17 candidates' positions?  
18 A. I have attended forums, I read articles  
19 in the local newspaper online. They usually carry  
20 local politicians' statements prior to an election.  
21 I listen to public radio, I read The Capitol Times  
22 online. It's harder to get state information  
23 recently because local papers are not as prevalent  
24 as they used to be.  
25 Q. Any other way you inform yourself of

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1 candidate positions?  
2 A. National -- for national elections, I  
3 sometimes will listen to podcasts of different news  
4 programs, especially while I'm driving. I do a lot  
5 of driving for work, so I'll listen to those  
6 podcasts while I'm driving.  
7 Q. Like which ones do you listen to?  
8 A. Rachel Maddow, Pod Save America, All in  
9 with Chris Hayes, and On the Media.  
10 Q. And what are the issues that are  
11 important to you, would you say?  
12 A. I would say women's issues, the  
13 environment, and health care access.  
14 Q. And if there were a Democratic candidate  
15 that -- that held a stance that was adverse to one  
16 of these, would you vote for him or her?  
17 A. If it was just one of those issues, I  
18 might still vote for them. But if they were  
19 against -- if they had policies that were against  
20 what I believe is important on all three issues, I  
21 probably would not support them.  
22 Q. Would you vote for a Republican that  
23 supported some of these issues?  
24 A. If they showed it, not just talked it.  
25 Because in my view, in the last 15 years, the

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1 Republicans in the state don't -- would not support  
2 those issues. If they did, they would be kind of  
3 drummed out. So I don't think it's likely to  
4 happen.  
5 Q. Uh-huh. Now, you said you had voted for  
6 some Republicans. But would you say that you agree  
7 with some Republicans some of the time?  
8 A. Not on -- not for state offices or  
9 national offices. I rarely ever agree with them.  
10 Q. Aside from your voting, are you  
11 politically active in other ways?  
12 A. Yes.  
13 Q. How's that?  
14 A. Since 2004 -- something I forgot to put  
15 in my responses to interrogatories. It's a  
16 nonpartisan group, so I didn't perceive it to be  
17 political, but I was also involved with the  
18 business and governmental affairs committee for our  
19 local chamber of commerce. And we would host  
20 forums. So we're nonpartisan, nonpolitical, but we  
21 would host the forums for political candidates. So  
22 I didn't consider that to be a political activity  
23 per se for nonprofit. But aside from that, I  
24 became more politically active I would say in 2004.  
25 Q. Uh-huh. Why don't you tell me a little

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<p>1 bit about this business and government affairs --</p> <p>2 what did you say it was?</p> <p>3 A. Committee.</p> <p>4 Q. Committee. Okay. How did you get</p> <p>5 involved in that?</p> <p>6 A. As a member of the -- my firm was a</p> <p>7 member of the chamber of commerce, and they asked</p> <p>8 me to participate in that committee. The director.</p> <p>9 Q. And how many members are on that</p> <p>10 committee?</p> <p>11 A. It varied. I would say between eight to</p> <p>12 ten. And I believe that municipal leaders and</p> <p>13 local representatives were kind of ad hoc members</p> <p>14 of the committee.</p> <p>15 Q. Okay. And when did you become a member?</p> <p>16 A. I don't remember. It's --</p> <p>17 Q. After 2004?</p> <p>18 A. No, would have been before that.</p> <p>19 Q. Are you still a member?</p> <p>20 A. No.</p> <p>21 Q. When did you stop being a member?</p> <p>22 A. I would say maybe 2000 to 2002. I did</p> <p>23 not like what the state chamber of commerce and</p> <p>24 national chamber of commerce were doing politically</p> <p>25 with the courts and elections, and so I -- though</p>	<p>1 political organizations?</p> <p>2 A. I'm a member of the Wood County</p> <p>3 Democratic Party.</p> <p>4 Q. Okay. When did you become a member of</p> <p>5 the Wood County Democratic Party?</p> <p>6 A. In February, March, of 2018.</p> <p>7 Q. And how about the state Democratic party?</p> <p>8 A. At the same time.</p> <p>9 Q. Okay. And what made you decide to become</p> <p>10 a member of those organizations?</p> <p>11 A. It was partly because of the election of</p> <p>12 Donald Trump that it made me decide I should commit</p> <p>13 and become a member of the party and not just a</p> <p>14 helper or volunteer.</p> <p>15 Q. Any other political organizations of</p> <p>16 which you're a member?</p> <p>17 A. No, not political organizations.</p> <p>18 Q. How much time would you say you spend per</p> <p>19 week on political activity?</p> <p>20 A. It depends if it's an election year. I</p> <p>21 did a lot of -- I spent a lot of time on elections</p> <p>22 during the last year, in 2018. I began circulating</p> <p>23 nomination papers for a number of candidates,</p> <p>24 including Tammy Baldwin, Brian Ewert for Congress,</p> <p>25 Chris Kapsner for state senate.</p>
<p>Page 19</p> <p>1 my firm was still a member, I stopped being an</p> <p>2 active member.</p> <p>3 Q. And you said you had candidate forums</p> <p>4 when you were on this committee. Did you have both</p> <p>5 Democrats and Republicans?</p> <p>6 A. Yes.</p> <p>7 Q. And was it for mostly local office?</p> <p>8 A. School board, city council, mayor, and</p> <p>9 also assembly representatives.</p> <p>10 Q. Do you know, is this committee still</p> <p>11 ongoing?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Now, why don't you tell me other</p> <p>14 ways that you're politically active.</p> <p>15 A. I began in 2004 as doing calling,</p> <p>16 canvassing for the local Democratic party office.</p> <p>17 And I was also recruited to be an election</p> <p>18 monitor -- or an election integrity monitor for the</p> <p>19 local elections.</p> <p>20 Q. And this was through the --</p> <p>21 A. The state Democratic party.</p> <p>22 Q. -- state Democratic party. Are you a</p> <p>23 member of the state Democratic party?</p> <p>24 A. I am now.</p> <p>25 Q. Okay. Are you a member of any other</p>	<p>Page 21</p> <p>1 Q. And I know you have a lot of things --</p> <p>2 A. Yeah.</p> <p>3 Q. -- listed in your interrogatories, so it</p> <p>4 might be easiest to just go through those when we</p> <p>5 look at those --</p> <p>6 A. Okay, yeah.</p> <p>7 Q. -- to jog your memory. Have you ever</p> <p>8 campaigned for a candidate?</p> <p>9 A. Yes.</p> <p>10 Q. Who was that?</p> <p>11 A. I campaigned for John Kerry, I campaigned</p> <p>12 for Russ Feingold, I campaigned for Amy Sue</p> <p>13 Vruwink, for Julie Lassa. I campaigned for a</p> <p>14 couple of school board members during the last</p> <p>15 year, Karen Shulman and Sam -- I can't think of</p> <p>16 Sam's last name.</p> <p>17 Q. That's okay.</p> <p>18 A. I can picture her, but --</p> <p>19 Q. If it comes to you, just let me know.</p> <p>20 Any others that you campaigned for?</p> <p>21 A. When Julie Lassa was running for</p> <p>22 Congress, I campaigned for her. For Margaret</p> <p>23 Enge -- Engebretson, when she won the primary last</p> <p>24 year against Brian Ewert, I campaigned for</p> <p>25 Margaret. My husband and I both canvassed for</p>

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1 Nancy Stencil in district 86. And I campaigned for  
 2 Mary Burke for governor, campaigned for Mandela  
 3 Barnes for lieutenant governor, and Tony Evers for  
 4 governor in 2018. And there was a Mary who ran for  
 5 Congress, and I can't think of her last name right  
 6 now, but I -- I did some canvassing and calling for  
 7 her. And they -- mostly through the Democratic  
 8 party office in Marshfield.  
 9 Q. And when I say cam -- or when you say  
 10 campaigning, are you talking about canvassing and  
 11 calling?  
 12 A. Yes.  
 13 Q. Is anything else that you were doing?  
 14 A. That was the main thing. I made some  
 15 political contributions that I listed there. I  
 16 don't have records and I couldn't remember what I  
 17 contributed in prior years because I didn't keep  
 18 those records because they're not deductible, so I  
 19 don't -- I made some contributions, but I can't  
 20 remember for whom or when.  
 21 Q. Did you list these in your interrogatory  
 22 responses?  
 23 A. I think most of them. I might not have  
 24 listed Margaret Engebretson because it was  
 25 not -- that was just part of the canvassing and

Page 23

1 calling through the office, whereas Brian Ewert, I  
 2 mentioned donating to him directly. And I believe  
 3 I listed a campaign donation to Margaret  
 4 Engebretson after she won the primary.  
 5 Q. And again, we can talk about these in  
 6 more detail when we look at your responses. Did  
 7 any of these candidates go on to lose their  
 8 election?  
 9 A. Yeah, a number of them.  
 10 Q. And did you believe at the outset that  
 11 they were going to lose their election?  
 12 A. I thought they had a chance. But Nancy  
 13 Stencil, no, I didn't think she had a chance for  
 14 assembly.  
 15 Q. Okay. Did anyone ever stop you from  
 16 campaigning for a candidate?  
 17 A. No.  
 18 Q. Do you donate to candidates?  
 19 A. Yes.  
 20 Q. Have you ever donated to a candidate  
 21 who's gone on to lose an election?  
 22 A. Yes.  
 23 Q. And has anyone ever stopped you from  
 24 making a donation?  
 25 A. No, no.

Page 24

1 Q. Have you ever contacted your elected  
 2 representative?  
 3 A. Yes.  
 4 Q. And who was that?  
 5 A. I listed all the ones I could think of in  
 6 my responses. I don't have records going back all  
 7 the way to 2002. I had a computer crash. And I  
 8 don't even know if they would have been there  
 9 anyway, but -- so I can't say how many I contacted  
 10 back that far. But I've done some petitions online  
 11 and then get a response back sometimes, not always.  
 12 So I don't have a record of what I put in, because  
 13 it's just signing a petition.  
 14 I've done something -- I forgot to put  
 15 in the responses I get some text alerts from Daily  
 16 Action. And sometimes if the issue is one that I  
 17 think is important to me, I will make that phone  
 18 call. There would be no record, but just, you  
 19 know, as an alert. But -- and then I've done a  
 20 couple of e-mails to representatives.  
 21 Q. And who did you send e-mails to?  
 22 A. I sent an -- two e-mails that I can --  
 23 that I could find or remember to Robert Kulp, my  
 24 assembly rep.  
 25 Q. And what were those e-mails about?

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1 A. One was about the state giving away  
 2 property in Kohler-Andrae state park, and the other  
 3 one was about the, what they called the lame-duck  
 4 legislation. And I also sent a similar e-mail on  
 5 lame-duck legislation to Senator Moulton and to  
 6 then-Governor Walker.  
 7 Q. So the e-mail you sent to Representative  
 8 Kulp about the property in Kohler-Andrae state  
 9 park, did you say?  
 10 A. Yes.  
 11 Q. What year was that?  
 12 A. It's -- the date of the e-mail is in the  
 13 production of documents. So it was when that was  
 14 up for approval by the state legislature. So I  
 15 can't remember exactly what year it was, but it was  
 16 when the legislation was pending.  
 17 Q. Okay.  
 18 A. And he responded saying that it was a  
 19 good deal for the state 'cause they were getting  
 20 more wooded property inland, without taking into  
 21 account that fragile dunes next to the lake are  
 22 more valuable ecologically than acres of woodland  
 23 inland. So it was such an inane response I didn't  
 24 bother following up with it. It seemed fruitless.  
 25 Q. Did you contact anyone else about that

<p style="text-align: right;">Page 26</p> <p>1 issue?</p> <p>2 A. No, I don't think so.</p> <p>3 Q. And then what about the lame-duck -- the</p> <p>4 e-mail about the lame duck legislation? That would</p> <p>5 have been in 2018, I assume?</p> <p>6 A. Yes.</p> <p>7 Q. Did you receive a response from</p> <p>8 Representative Kulp on that?</p> <p>9 A. I think I did. I'm not sure.</p> <p>10 Q. Did you receive a response from Senator</p> <p>11 Moulton or Governor Walker?</p> <p>12 A. I don't believe I did.</p> <p>13 Q. And were these e-mails that you thought</p> <p>14 to send yourself, or did someone suggest that you</p> <p>15 send them?</p> <p>16 A. No, they were ones I thought to send</p> <p>17 myself.</p> <p>18 Q. And you -- you drafted them yourself?</p> <p>19 A. Yes.</p> <p>20 Q. In terms of contacting your</p> <p>21 representatives, you also mentioned signing</p> <p>22 petitions online.</p> <p>23 A. Yes.</p> <p>24 Q. Do you remember when you've done that?</p> <p>25 A. If I get an e-mail and it's something</p>	<p style="text-align: right;">Page 28</p> <p>1 A. No, they link you in with the 800 number</p> <p>2 to their office to leave a message.</p> <p>3 Q. Okay. And then you did call that and</p> <p>4 make a -- leave a message?</p> <p>5 A. If it's an issue of concern to me, I</p> <p>6 will -- I sometimes will do that if I have time.</p> <p>7 Q. Have any of those text alerts gone to</p> <p>8 your assembly representative?</p> <p>9 A. No, not that I can think of. I don't --</p> <p>10 I don't think most of them are concerned with local</p> <p>11 state politics.</p> <p>12 Q. Uh-huh. Okay. Any other ways in which</p> <p>13 you've contacted your political representatives?</p> <p>14 A. That's all I can think of.</p> <p>15 Q. Phone calls?</p> <p>16 A. Those types of phone calls. I haven't</p> <p>17 usually initiated them on my own.</p> <p>18 Q. How about face-to-face meetings?</p> <p>19 A. I went -- I went to one local forum with</p> <p>20 Sean Duffy and, again, brought up health care.</p> <p>21 Q. Do you remember when that was?</p> <p>22 A. I don't. And I don't -- I know I had to</p> <p>23 leave early because I had a scheduling conference</p> <p>24 with the court. But that's -- I didn't have that</p> <p>25 on my calendar, so I couldn't pinpoint a date.</p>
<p style="text-align: right;">Page 27</p> <p>1 that is of concern to me, I will sometimes click on</p> <p>2 and add my name to the petition. Sometimes about</p> <p>3 health issues. That was one of the things that I</p> <p>4 wrote in my e-mails with regard to the lame duck</p> <p>5 legislation, was the importance of health care for</p> <p>6 myself and small business owners like myself. So I</p> <p>7 will then, if it's an issue like that, I will sign</p> <p>8 the petition.</p> <p>9 Q. And did any of these petitions go to your</p> <p>10 assembly representative?</p> <p>11 A. I don't think. Most of them are more</p> <p>12 statewide and national. I don't think that there</p> <p>13 were any that went to a state representative or</p> <p>14 state senator.</p> <p>15 Q. Then you mentioned text alerts too. Tell</p> <p>16 me about that.</p> <p>17 A. I signed onto The Daily Action Caller.</p> <p>18 And they send out texts sometimes; it's not always</p> <p>19 daily. And if it's something that is of concern to</p> <p>20 me, then you press the 800 number and they'll link</p> <p>21 you up with the office of concern. It's usually to</p> <p>22 representative Sean Duffy or to state -- or to the</p> <p>23 US senators, Ron Johnson or Tammy Baldwin.</p> <p>24 Q. And then -- so you're then sending a text</p> <p>25 to those representatives?</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. After 2011, you think?</p> <p>2 A. Yeah. Oh, I remember what it was. I</p> <p>3 brought up whether he would protect Social Security</p> <p>4 and Medicare with regard to the budget deficit</p> <p>5 caused by the tax act.</p> <p>6 Q. And did you receive a response?</p> <p>7 A. He said that Medicare and programs,</p> <p>8 entitlement programs like that, were on the</p> <p>9 chopping block potentially to be looked at.</p> <p>10 Q. And were there other people at this -- at</p> <p>11 this forum?</p> <p>12 A. Yes.</p> <p>13 Q. About how many people, would you say?</p> <p>14 A. I would say 20 to 30.</p> <p>15 Q. Where was the forum held?</p> <p>16 A. I think it was at the American Legion</p> <p>17 hall. It was either American Legion or the Eagle's</p> <p>18 Club.</p> <p>19 Q. In --</p> <p>20 A. Marshfield.</p> <p>21 Q. -- Marshfield? Okay. Any other elected</p> <p>22 representative that you've met in person or you've</p> <p>23 met with in person?</p> <p>24 A. Well, I've met Tammy Baldwin at several</p> <p>25 candidate presentations. And also there were</p>

<p style="text-align: right;">Page 30</p> <p>1 fundraising events for her.</p> <p>2 Q. Okay.</p> <p>3 A. I also met a lot of candidates, including</p> <p>4 Tammy Baldwin, at the seventh congressional</p> <p>5 district convention in the spring of 2018, and at</p> <p>6 the state convention.</p> <p>7 Q. And again, these things are in your</p> <p>8 interrogatory responses?</p> <p>9 A. I believe I reference just the general</p> <p>10 political action in 2018, and that I'd gone to the</p> <p>11 convention.</p> <p>12 Q. Uh-huh. Do you ever encourage other</p> <p>13 people to contact their elected representatives?</p> <p>14 A. Not -- not usually. I kind of leave that</p> <p>15 for people to make their own decisions.</p> <p>16 Q. Going back to the Wood County Democratic</p> <p>17 Party and the state Democratic party. Do you</p> <p>18 attend meetings for either of those?</p> <p>19 A. I went to the state convention for the</p> <p>20 first time in 2018 as a delegate from Wood county.</p> <p>21 And I go to the Wood County Democratic Party</p> <p>22 meetings. And was doing that even before I was a</p> <p>23 member, on occasion.</p> <p>24 Q. Are those monthly?</p> <p>25 A. No, I think they're every other month.</p>	<p style="text-align: right;">Page 32</p> <p>1 A. I really -- I don't know. I don't have</p> <p>2 any idea.</p> <p>3 Q. Okay.</p> <p>4 A. If there's a candidate who's going to be</p> <p>5 presenting at the meeting, then it's going to have</p> <p>6 a bigger draw.</p> <p>7 Q. How about posting political messages on</p> <p>8 social media, do you ever do that?</p> <p>9 A. Yes, on Facebook. I don't have a Twitter</p> <p>10 account or any of the others.</p> <p>11 Q. And how often do you do that?</p> <p>12 A. We have a closed group in Marshfield</p> <p>13 called Facts Matter, and I have posted on there</p> <p>14 occasionally. Not -- not every day or anything</p> <p>15 like that, but if something comes up that I want to</p> <p>16 bring to people's attention, I will post something</p> <p>17 on Facts Matter.</p> <p>18 Q. What is Facts Matter?</p> <p>19 A. It's a group that was started after the</p> <p>20 2016 election concern about claims of fake news and</p> <p>21 fake science. A number of people who were in the</p> <p>22 science field and the medical field who are</p> <p>23 concerned about science as fact not being -- or</p> <p>24 being set aside. And so a group was formed to try</p> <p>25 to work on that issue. And there's a closed</p>
<p style="text-align: right;">Page 31</p> <p>1 But since Act 43, Wood county was divided both</p> <p>2 assembly reps, state senate, and congressional</p> <p>3 districts. And so since then, our county</p> <p>4 Democratic party has two units and every other</p> <p>5 meeting is a meeting of just the north Wood and</p> <p>6 south Wood county; they call that the seventh</p> <p>7 circuit and third circuit, or third district. And</p> <p>8 then two or three times a year get together for a</p> <p>9 joint county meeting.</p> <p>10 Q. And how many people are in each of those</p> <p>11 circuits, as you call them?</p> <p>12 A. During an election year, there are more</p> <p>13 people in attendance than during a nonelection</p> <p>14 year. So in even years, there might be 20 to 30,</p> <p>15 depending on if it's a joint meeting or a separate</p> <p>16 meeting. Probably fewer at the separated meetings.</p> <p>17 But because they have different representatives for</p> <p>18 every office, they've had to split their meetings</p> <p>19 up to try to function.</p> <p>20 Q. Okay. And you said 20 to 30 on -- during</p> <p>21 election years. Is that people who come to the</p> <p>22 meetings?</p> <p>23 A. Yes.</p> <p>24 Q. Do you have a sense of how many people</p> <p>25 are members of the Wood County Democrats?</p>	<p style="text-align: right;">Page 33</p> <p>1 Facebook group.</p> <p>2 And I'm in a small community, and I</p> <p>3 have a number of friends who are not of the same</p> <p>4 political ideas that I have, and so I try not to</p> <p>5 post a lot of political things on my social</p> <p>6 Facebook page. So I will post them on the Facts</p> <p>7 Matter Facebook page.</p> <p>8 Q. And you became a member in 2016?</p> <p>9 A. I think the group started in late 2016 or</p> <p>10 early 2017 after the inauguration of Donald Trump.</p> <p>11 Q. And does it just involve this closed</p> <p>12 Facebook page, or do you meet in person too?</p> <p>13 A. They've met occasionally in person, but</p> <p>14 usually there's a person who sends out an e-mail,</p> <p>15 and people can contribute to that e-mail. I</p> <p>16 think -- I don't think I've contributed very often,</p> <p>17 just usually receive them.</p> <p>18 Q. When you say contribute to the e-mail,</p> <p>19 what do you mean?</p> <p>20 A. If there's an issue that is of importance</p> <p>21 to them, or they've got an article that they want</p> <p>22 to share with the group, they will forward it to</p> <p>23 the person who's accumulating the information to</p> <p>24 send to the group. So I don't even have</p> <p>25 information on who's on that e-mail list because</p>

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1 that would be kind of a -- a private CC, which I  
2 don't even know how to do that kind of computer  
3 thing, but --  
4 Q. Uh-huh.  
5 A. So if I wanted her to do something, I  
6 would have to send it to her to screen and put in  
7 her e-mail.  
8 Q. Sure. And then do people respond to that  
9 e-mail?  
10 A. No, because it's usually not going out to  
11 the entire group if they respond.  
12 Q. Uh-huh. Okay.  
13 A. But that's why the Facebook page was  
14 started, so there people can post things directly.  
15 Q. And about how many people are members of  
16 Facts Matter?  
17 A. I don't know, because I don't have the  
18 tally of the e-mail.  
19 Q. Uh-huh.  
20 A. So I wouldn't know.  
21 Q. And there's no way to tell that on  
22 Facebook?  
23 A. There may be, but I don't know.  
24 Q. I know even less about Facebook than you  
25 do, I can assure you, but --

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1 A. There may be a way to do that, but I  
2 don't know.  
3 Q. Okay. And you said you have met in  
4 person with the Facts Matter people?  
5 A. More like a, you know, having dinner  
6 together, but not really a, I mean, kind of  
7 meeting. Just talk and --  
8 Q. When was -- do you remember when that  
9 was, or how many times you've met?  
10 A. Probably two or three times.  
11 Q. Since 2016?  
12 A. Yeah.  
13 Q. Okay.  
14 A. So we've seen each other, or people I  
15 know who are members at, like, Tammy Baldwin's  
16 fundraiser, things like that, but not really -- and  
17 then also just having dinner as friends.  
18 Q. And how many people were at the dinners,  
19 the two to three dinners that you attended?  
20 A. Four or five.  
21 Q. Do you have a sense for whether the  
22 people who are members of Facts Matter are all from  
23 your area?  
24 A. Oh, yeah, I think most of them are from  
25 our area, yeah.

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1 Q. And by "area," do you mean Wood county  
2 or --  
3 A. Well, Marshfield is on the north end of  
4 Wood county, and straddles the county line with  
5 Marathon county. So I would say from Clarke,  
6 Marathon and Wood counties for the most part, yes.  
7 Q. So people in your assembly district?  
8 A. No, people from our community of  
9 interest, from our economic area.  
10 Q. Okay. So some of the documents that you  
11 provided include Facebook posts which are, I  
12 assume, from this Facts Matters closed group?  
13 A. Most of them were from the Facts Matter  
14 closed group. There was a group that had been  
15 started before that Facebook page was started  
16 called Political Like Minders. And I had a few  
17 posts from Political Like Minders that were  
18 submitted, and a few from before that on my  
19 Facebook page. But they were kind of  
20 quasi-political, but I included them. But I don't  
21 usually do political posts on my social Facebook  
22 page.  
23 Q. On your personal one?  
24 A. Yeah. But I did have a few, and those  
25 were submitted.

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1 Q. Okay. So Political Like Minders, what is  
2 that?  
3 A. It's another closed group. I don't  
4 know -- I wasn't in on the starting of it. I was  
5 invited to join it by someone who was a member.  
6 Q. And when did you join?  
7 A. I would say maybe it started around early  
8 2017. I'm not sure.  
9 Q. Is that group still going on?  
10 A. It's still going, but is probably less  
11 active when Facts Matter became more prevalent in  
12 posts.  
13 Q. Do you have a sense for how many people  
14 were members of Political Like Minders back in  
15 2017?  
16 A. I don't. I don't.  
17 Q. And like Facts Matters, were there  
18 e-mails sent out to that group?  
19 A. Not that I know of, no.  
20 Q. So it was just --  
21 A. If they were doing that, I wasn't part  
22 it.  
23 Q. Sure.  
24 A. So I wouldn't --  
25 Q. So just a Facebook page?

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1 A. Yeah, that's my only involvement with it.  
2 Q. How did you become a member of Political  
3 Like Minders?  
4 A. One of the people involved with it sent  
5 me an invitation. And I can't remember. I think  
6 it was Kathleen Rulka, but I'm not certain.  
7 Q. Is that a friend of yours?  
8 A. Yes.  
9 Q. Okay. And I guess I didn't ask you this  
10 about Facts Matters. How did you become a member  
11 of Facts Matters?  
12 A. Again, I was sent an invite. And I'm not  
13 sure who sent me the invite. It may have been  
14 Jodie Chinecki, who's the one who does the e-mail  
15 list. And -- or it could have been Karen Shulman,  
16 who's another friend who's involved in it.  
17 Q. These are all -- all of these people are  
18 friends of yours?  
19 A. Yes.  
20 Q. That live in your area?  
21 A. Yes.  
22 Q. Okay. So a number of your Facebook posts  
23 are redacted. Do you know why they're redacted?  
24 A. No. I -- that was a decision made by the  
25 attorneys for private information that might have

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1 been contained. I don't know. I wasn't part of  
2 that decision.  
3 Q. So you didn't ask for them to be  
4 redacted?  
5 A. I was told -- well, I probably --  
6 Q. Don't tell me anything --  
7 A. Yeah.  
8 Q. -- that your attorney -- about your  
9 conversations with your attorney, but --  
10 A. I don't -- I wasn't -- no, I don't want  
11 to respond.  
12 Q. Is it because you don't know or because  
13 you don't want to respond?  
14 A. I don't know why certain things were  
15 redacted. But also the discussions I had would be  
16 privileged.  
17 Q. Okay. Are you familiar with Act 43? I  
18 know you referenced it earlier, but --  
19 A. Yes.  
20 Q. When did you first learn about Act 43?  
21 A. When it was brought from the closed  
22 chambers and presented to the state legislature.  
23 Q. So 2011?  
24 A. Yep.  
25 Q. How did you learn about it?

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1 A. Through the news.  
2 Q. And when did you first learn about the  
3 boundaries for your assembly district as drawn by  
4 Act 43?  
5 A. I would say soon after it was presented,  
6 or -- and it was -- it went through very quickly,  
7 from my recollection. And it was discussed on  
8 public radio. And also I think how it was going to  
9 affect our district was in the local paper.  
10 Q. So you have discussed the -- the drawing  
11 of your district in your complaint, or you've made  
12 allegations about your district in the complaint.  
13 A. Yeah.  
14 Q. What is it about your district as drawn  
15 by Act 43 that you think has caused you harm?  
16 A. Well, in the 35 years I've lived in  
17 Marshfield, or almost 35 years, the municipality of  
18 Marshfield has always been in one district. So  
19 that community of interest is represented by one  
20 representative and one state senator and one  
21 Congress person. So that's made it more difficult  
22 to have our community concerns brought to the  
23 attention of the representatives.  
24 We were also part of Wood county in  
25 our representation with our assembly

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1 representative, our congressional representative,  
2 and assembly representative, prior to Act 43. So  
3 Wood county's interests as a community, political  
4 community and economic community, would be  
5 represented by one person. Now we're fractured in  
6 three or four different assembly districts, and so  
7 we don't have an -- just -- you can see that even  
8 with our county party, we don't have one party to  
9 get behind a person to help support them to run for  
10 office because we've got so many different  
11 districts from our community.  
12 We were also part of the state senate,  
13 which isn't the focus of this suit, but with Julie  
14 Lassa and other state senators with our community  
15 of interest with the River Valley, Stevens -- going  
16 over towards Stevens Point, and that was of such  
17 significance that even the regional chamber of  
18 commerce is focused on that area because we have  
19 areas of concern.  
20 Now, Marshfield is in with, you know,  
21 over towards -- over here, just north of here,  
22 Chippewa Falls. And I don't think we've had our  
23 state senator visit, to my knowledge, since Act 43.  
24 Q. And when you say community of interest,  
25 are you referring to Marshfield?

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1 A. I'm referring to our economic area, which  
2 is Marshfield, and then our tri-county area of  
3 eastern Clarke county, southern Marathon county,  
4 and Wood counties.  
5 Q. So is it your contention that your  
6 district was cracked?  
7 A. Yes.  
8 Q. And is it your contention that you were  
9 taken out of a fair district and put into an unfair  
10 district?  
11 A. Yes.  
12 Q. And what is it about your current  
13 district that makes it unfair?  
14 A. There's almost no chance for a Democratic  
15 candidate to prevail. And that, I think, is shown  
16 by the lack of any candidate in the last two  
17 elections. That it's a fruitless effort. And it's  
18 hard for somebody to run. Whereas before Act 43,  
19 we had an election after Don Hasenohrl, who'd been  
20 there for a long time, retired, where there was  
21 such a close vote that there was a recount, I think  
22 a hand recount, and the Republican candidate,  
23 MaryAnn Lippert, prevailed. But it was that close.  
24 And I would say that prior to Act 43,  
25 even though MaryAnn Lippert was a Republican and I

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1 didn't vote for her, she was more responsive to  
2 issues brought up by people that she knew were  
3 Democrats because it was an evenly balanced  
4 district, so she had to pay attention to people.  
5 And I think was more responsive, not just sending a  
6 form e-mail saying thank you for your input, but  
7 actually listening to what people were saying.  
8 And then the next election Amy Sue  
9 Vruwink won. And, you know, since we got put into  
10 district 86, the Democrats haven't had a chance.  
11 No, we're not in 86. 86 is east side of  
12 Marshfield. See, that's what happened. We'd have  
13 to have a map and say oh, are you on the east side  
14 of Peach Street? Then you're in district 86. So  
15 that's what happened to our community. But since  
16 then, you know, Paul Knoff didn't have a chance,  
17 Norb Salamonski didn't have a chance, and no one's  
18 run.  
19 Q. So you're currently in district 69; is  
20 that correct?  
21 A. Yeah.  
22 Q. And you were in district 70?  
23 A. Correct.  
24 Q. Do you think it's possible for a Democrat  
25 to win in either of those districts?

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1 A. In which district, 69?  
2 Q. In 69, let's start there.  
3 A. I don't think it's likely, no. And it's  
4 hard to get candidates to run.  
5 Q. How about 70?  
6 A. They -- it was not a close election.  
7 They did have a candidate running.  
8 Q. Do you think it's possible for a Democrat  
9 to win in that district?  
10 A. Probably not. If Amy Sue couldn't win,  
11 then they're not going to have anybody else who's  
12 got the name recognition who's going to have a  
13 ghost of a chance. And it's hard too when we don't  
14 have a county party to get behind one candidate  
15 because of the split of the county.  
16 Q. When did you first come to believe that  
17 your district was cracked?  
18 A. As soon as I saw that Marshfield was  
19 divided.  
20 Q. So back in 2011?  
21 A. Yes.  
22 Q. And was that through, as you said, news  
23 reports?  
24 A. Yes.  
25 Q. Is it your understanding that your

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1 lawyers are proposing a new assembly district map  
2 in this case?  
3 A. That's not my understanding. My  
4 understanding is that there's a map that they've  
5 shown as a representative of what would be a fair  
6 map. I haven't seen the map, I've just seen it  
7 discussed in news reports and also in the  
8 complaints. But --  
9 Q. And are you referring to the map drawn by  
10 Dr. Jowei Chen?  
11 A. Yes. But my understanding is that, you  
12 know, that's a representative of what a fair map  
13 could look like. I think also representative would  
14 be the map that was in place before Act 43 would be  
15 a fair map.  
16 Q. And what about the map in effect before  
17 Act 43 made it fair?  
18 A. It was compact; the congressional  
19 district included more of a, you know -- I mean,  
20 it's a huge area anyway, just population -- because  
21 of the low population. So geographically it's a  
22 huge area. But when it was redrawn, they snaked it  
23 along and took out Stevens Point and put them in  
24 the district that was over on the Mississippi  
25 River.

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1 So it's -- it's not a compact area  
2 where the community of interest has one  
3 congressional representative. So -- and the same  
4 with assembly. We had all of Marshfield, and I  
5 think usually it was always all of Wood county, or  
6 most of it, in one assembly district. And state  
7 senate, we had all of Marshfield, all of Wood  
8 county, and a good part over towards Stevens Point  
9 in one state senate district, which was our  
10 community of interest.  
11 I know with the forum that Congressman  
12 Obey was at, he had the map, some successions of  
13 maps of the congressional district showing how each  
14 time it was more compact and -- you know, you can't  
15 be square, but as close to it as possible, and how  
16 it was different after Act 43. The state senate  
17 district, like I said, comes all the way over from  
18 Marshfield through Chippewa Falls. And we didn't  
19 get any visits or attention, whereas when Julie  
20 Lassa was our state senator, she was there at many  
21 public events.  
22 Q. So the districts we're talking about are  
23 69, 70, and 86?  
24 A. Yes.  
25 Q. Now, in the pre-Act 43 map, which you say

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1 you're familiar with, did you think it was possible  
2 for a Democrat to win in district 69?  
3 A. I didn't know, because I wasn't active in  
4 that district.  
5 Q. How about 70?  
6 A. Yes.  
7 Q. And 86?  
8 A. Again, I wasn't as familiar with it  
9 'cause it was more concentrated over toward Wausau  
10 back then, and so it was outside of our -- kind of  
11 our community. So I didn't pay as much attention  
12 to it.  
13 Q. And in 70, district 70, prior to Act 43,  
14 did a Republican ever win --  
15 A. Yes.  
16 Q. -- the assembly district?  
17 A. Yeah, MaryAnn Lippert won.  
18 Q. What year was that?  
19 A. It was the first year that -- after Don  
20 Hasenohrl retired. And I can't remember the year.  
21 Q. So you say you have not looked at the  
22 proposed map drawn by Dr. Jowei Chen?  
23 A. I may have glanced at it in coverage or  
24 something with a complaint, but I haven't studied  
25 it per se, just read the descriptions.

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1 Q. And with the proposed district for  
2 your -- for your area, do you feel that you'd  
3 continue to suffer the same harms with that  
4 proposed map?  
5 A. Again, I didn't read it as being a  
6 proposed map. That it's representative of what a  
7 fair map would look like. And, you know, I'm not  
8 sure it -- what I could see, it looked like it  
9 would be more fair to our area and the community.  
10 Q. And why was that?  
11 A. Because of it being more compact and  
12 keeping communities together.  
13 Q. Did you look at the percentages of  
14 Republican and Democratic vote share for the  
15 districts in that proposed map?  
16 A. Not for the districts, no. I've seen  
17 some articles that talk about how many votes  
18 Democrats would have to get to be able to get --  
19 you know, I've just read articles that, for  
20 instance, the Democrats would have to get -- or  
21 Democratic party would have to get, like, 60-some  
22 percent of the vote to get 50 percent of the seats  
23 the way the maps are structured presently.  
24 Q. Presently. But you haven't looked at any  
25 of the vote shares for the proposed fair map?

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1 A. For the Chen map, no.  
2 Q. Okay. When did you first decide to  
3 become a plaintiff in this lawsuit?  
4 A. When it was remanded. I knew that they  
5 were going to add some plaintiffs, and so I was  
6 curious and I contacted the attorneys.  
7 Q. So would this have been summer of 2018?  
8 A. Yeah, roughly. I don't remember the  
9 date, but it would have been sometime after the  
10 remand.  
11 Q. How did you learn the case had been  
12 remanded?  
13 A. Through news articles.  
14 Q. And then you contacted the attorneys for  
15 the plaintiffs in that case?  
16 A. Yes, I did.  
17 Q. Who did you call, or who did you contact?  
18 A. I contacted the office. And I don't  
19 remember who I spoke to. And then at a later time  
20 a phone call was arranged for me to talk with  
21 somebody.  
22 Q. And who did you talk to that first time?  
23 A. I talked with Annabelle, I believe.  
24 Q. And --  
25 A. I didn't note it down because I was

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1 driving back from court, so --  
2 Q. And did you decide right then and there  
3 that you wanted to be a plaintiff?  
4 A. I said I was willing to be a plaintiff.  
5 And I didn't make that decision. I mean --  
6 Q. And then when did you talk to your  
7 attorneys again?  
8 A. I don't remember.  
9 Q. Okay.  
10 A. Sometime between then and when the  
11 amended complaint was filed, but I can't recall the  
12 timeframe.  
13 Q. Did you ever meet with your attorneys in  
14 person?  
15 A. No.  
16 Q. When was the first time you met with them  
17 in person?  
18 A. Today.  
19 Q. Today. Have you ever met with any of the  
20 other plaintiffs in this case?  
21 A. I saw Wendy Sue at a gubernatorial forum  
22 here in Eau Claire. But we didn't discuss  
23 gerrymandering at all because we were there for the  
24 gubernatorial forum. And Wendy Sue came to  
25 Marshfield when the case was still before the

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1 Supreme Court and did a presentation for the -- I  
2 think it was the Democratic county meeting at the  
3 library. And I met her that day.  
4 Q. What was the presentation on?  
5 A. It was on the gerrymandering case. That  
6 was before it was heard by the Supreme Court.  
7 Q. So when would this have been? Earlier in  
8 2018?  
9 A. No, I think it was earlier than that.  
10 Maybe a year or two ago.  
11 Q. And did that -- that presentation by  
12 Ms. Johnson, did that cause you to want to become  
13 involved in any way?  
14 A. I didn't think there was a possibility at  
15 that time. The case was going forward, so I don't  
16 think that prompted my interest to become a  
17 plaintiff, no.  
18 Q. And did you talk to Ms. Johnson at all  
19 about your district?  
20 A. I don't think so. She was there to  
21 present and talk about the -- the case and I -- no,  
22 so I don't think we did. I think we talked more  
23 about the Clark county judge and why she didn't  
24 like to practice before that judge in Clark county.  
25 I think that was -- it was unrelated to the

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1 litigation.  
2 Q. What did you do to prepare for this  
3 deposition?  
4 A. I looked over the amended complaint and I  
5 looked over my responses and productions of  
6 documents. I talked with Annabelle.  
7 Q. Are you aware that there's a trial  
8 scheduled in this case for April 23rd in Madison?  
9 A. Yes.  
10 Q. Are you planning to attend the trial?  
11 A. I don't know if they're going to ask me  
12 to attend or not. I do have the time to be there  
13 if I'm needed.  
14 Q. So do you know if you're going to be  
15 testifying?  
16 A. I don't know.  
17 Q. But there's no reason that you couldn't  
18 be in Madison on April 23rd?  
19 A. Correct.  
20 Q. Okay. All right. Let's have a look at  
21 your discovery responses.  
22 (Exhibit 58 marked for identification.)  
23 BY MS. KECKHAVER:  
24 Q. Are you familiar with that document?  
25 A. Yes.

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1 Q. What is that?  
2 A. My response to the first set of  
3 interrogatories and document production requests.  
4 Q. All right. I want to look at pages --  
5 starting at page 4 through 10.  
6 A. Okay.  
7 Q. Do those pages contain your responses to  
8 the interrogatories?  
9 A. Yes, they do.  
10 Q. And did you write those responses?  
11 A. I wrote the information for the attorneys  
12 to put into the format, yes. So I -- I gave them  
13 the information, and then the responses were  
14 formatted by the attorneys.  
15 Q. Uh-huh. So let's look at -- well, any  
16 reason to believe anything in here is inaccurate?  
17 A. No. As I indicated, there were some that  
18 I thought of afterward that I supplemented here  
19 today with the Daily Action calls and some things  
20 like that. But no, it would be accurate to the  
21 best of my knowledge, yes.  
22 Q. And we're going to go through some of the  
23 specific ones if you want to add some things to it.  
24 A. Okay.  
25 Q. Let's start with interrogatory number

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1 three, which is on page 5.  
2 A. Sure.  
3 Q. This one asks you to provide the names of  
4 candidates for whom you voted in the last ten years  
5 who were not Democrats. And we talked about this a  
6 little bit earlier.  
7 A. Yes.  
8 Q. Anyone on here that we didn't talk about  
9 earlier?  
10 A. No, I think we talked about all of them.  
11 Q. I think you also added the registrar.  
12 A. I think she's on here.  
13 Q. Oh, she is?  
14 A. Susan Ginter, register of deeds.  
15 Q. Oh, yeah, I see her. Okay. So you're  
16 comfortable that that response is complete and  
17 accurate?  
18 A. To the best of my knowledge, yeah. I  
19 don't even remember the party affiliation. I may  
20 have gotten -- I don't know who was running for  
21 register of deeds in the other years, so I didn't  
22 put anything down.  
23 Q. Uh-huh. Okay. All right. Let's look at  
24 interrogatory number four.  
25 A. Okay.

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1 Q. Please describe any political parties or  
2 other political organizations of which you are a  
3 member. And you see your response there. Is that  
4 complete and accurate?  
5 A. Yes. I added -- I don't consider it a  
6 political organization, but the governmental  
7 affairs committee was a nonpartisan group. So it's  
8 not really political, but that's why I brought it  
9 up today.  
10 Q. Any other groups that you'd want to add  
11 on there?  
12 A. No. We talked about Facts Matters, but  
13 that's not really a group, it's more like a  
14 Facebook type of group.  
15 Q. Any other political parties or  
16 organizations or Facebook groups that you're a part  
17 of?  
18 A. No, not that I -- nope.  
19 Q. So you say you participated in Wood  
20 county Democrats and Wisconsin Democratic Party for  
21 more than ten years as a volunteer. How did that  
22 differ from officially joining, other than, I  
23 imagine, there were some dues involved?  
24 A. Right. I don't think there's a lot of  
25 difference. You can't be a delegate if you're not

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1 a member.  
2 Q. Uh-huh.  
3 A. And I had decided last year I wanted to  
4 be a delegate.  
5 Q. What made you decide to do that?  
6 A. Well, one thing, I'm an empty nester now,  
7 so the time availability was presented. And also I  
8 feel committed, after the election of Donald Trump,  
9 to want to be interested as a delegate and be at  
10 the conventions.  
11 Q. And what did -- what did your duties  
12 involve with being a delegate?  
13 A. Voting on platforms and on rule changes.  
14 Q. Anything else?  
15 A. That would be the main duty. You get the  
16 advantage of being at the conventions and meeting  
17 candidates.  
18 Q. Uh-huh. And you said you went to the  
19 convention one time?  
20 A. Right. I went to the seventh CD  
21 convention, and then to the state convention.  
22 Q. Uh-huh. Okay. And those were both in  
23 2018?  
24 A. Correct.  
25 Q. Okay. Anything else you did as a

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1 volunteer for these two organizations?  
2 A. I spelled it out in more detail with the  
3 response to interrogatory seven and --  
4 Q. Okay.  
5 A. -- nine. So that would be the detail of  
6 describing the volunteering that I did.  
7 Q. Okay. We'll get to that in a second.  
8 Sorry, turning back to interrogatory number six.  
9 That asked you to describe your donations to  
10 candidates for political office, political parties,  
11 political action committees, and other partisan  
12 political organizations. Is your response there  
13 complete and accurate?  
14 A. It's the best that I could find,  
15 information-wise. As I indicated, I don't have  
16 records of political donations because they're not  
17 tax deductible, so I didn't retain records. So if  
18 they weren't on the party records or the  
19 candidate's records or something I could find,  
20 that's all I could verify.  
21 Q. Is it fair to say that all your donations  
22 were after 2011?  
23 A. No. Those were just all the ones that I  
24 had documentation for.  
25 Q. Okay. So there may have been some

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1 pre-2011, but you just didn't have records?  
2 A. I don't have any of those records.  
3 Q. Okay. Do you have a sense for whether  
4 your donations have increased in either amount or  
5 frequency since 2011?  
6 A. They've probably increased since 2016.  
7 Q. Okay. And why is that?  
8 A. Because of the election of Donald Trump,  
9 in large part.  
10 Q. Let's look at interrogatory number seven,  
11 which is on page 7. That one reads, "Please  
12 describe any other political activity" --  
13 A. Oh, can I go back up to your last  
14 question?  
15 Q. Of course.  
16 A. Another reason it increased in 2018 is  
17 that because of the change of the tax act, I  
18 decided I would group my donations that were  
19 deductible in 2017 and then not make charitable  
20 donations in 2018, but instead make political  
21 donations. So that was another reason it  
22 increased.  
23 Q. So you weren't donating to other sources  
24 and you --  
25 A. Correct.

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1 Q. Okay. All right. Interrogatory number  
2 seven reads, "Please describe any other political  
3 activity, including volunteering for political  
4 campaigns you've engaged in since 2002." Want to  
5 look over your response there and let me know if  
6 that's complete and accurate?  
7 A. Yes, supplemented with what I discussed,  
8 that I had been at those forums. That wasn't  
9 really volunteering, but that might have been a  
10 political activity, and so I brought those up.  
11 Q. Uh-huh. Let's look at the third bullet  
12 point. You volunteered to make Democratic  
13 telephone calls, and you were the elections  
14 integrity contact for Democratic presidential,  
15 congressional, and state office elections in 2016.  
16 Tell me what that entailed.  
17 A. Basically they wanted someone to be the  
18 volunteer attorney to be accessible by phone if  
19 there were issues with anybody having difficulty  
20 voting. So that's the election integrity. The  
21 calling was just that, going into the office in  
22 Marshfield and making phone calls.  
23 Q. And were you calling about a particular  
24 candidate?  
25 A. Calling for the slate of Democratic

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1 candidates. So that would have been, in 2016,  
2 Hillary Clinton and, I believe, Russ Feingold. And  
3 I think that -- Mary Huff, who was -- I think she  
4 was running for Congress. I can't think of her  
5 last name.  
6 Q. How about for your assembly person?  
7 A. I don't think we had anybody running for  
8 the assembly. I think it was vacant.  
9 Q. And you did telephone calls also in 2006,  
10 2010, and 2014?  
11 A. Yes.  
12 Q. Same kind of thing?  
13 A. The ones in 2006 were a little bit  
14 different because it was -- and I don't know what  
15 organization it was, but you could log in on the  
16 computer. And I was calling from home, and so I  
17 would get a list of places to call for contested or  
18 close races in other parts of the country. So I  
19 don't even remember who I would have been calling  
20 for, it was just a calling in. So that was  
21 different. And that's the only year that I can  
22 recall I did that.  
23 Q. Okay. The other years, 2010 and 2014,  
24 were similar to 2016?  
25 A. Yes, I believe so.

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1 Q. Let's look at page 8. Top -- first  
2 bullet point on page 8, you talk about how in  
3 August 2017 you organized a rally for Tammy  
4 Baldwin.  
5 A. Yes.  
6 Q. Can you tell me about -- about that?  
7 A. Nicky Jovrick, who was the outreach  
8 coordinator for Tammy Baldwin, was our field  
9 representative for Barack Obama in 2008. So she  
10 knew a number of us in our area, and she e-mailed  
11 or called me, I can't remember which, and asked me  
12 if I would be -- if I would organize a rally for  
13 Tammy Baldwin for the kickoff of her campaign.  
14 They were doing them throughout the state. So I  
15 organized the rally in Marshfield.  
16 Q. And about how many people attended that  
17 rally?  
18 A. I would say 30 to 35.  
19 Q. Anything else you did for Senator  
20 Baldwin?  
21 A. I think in the next bullet point I did  
22 indicate I gathered nomination signatures for Tammy  
23 Baldwin. And I was contacted -- she needed to take  
24 a conference call when she was on her way across  
25 the state, and so they contacted me, and I let them

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1 use office space for her conference call.  
2 Q. Sure.  
3 A. And I went to fundraisers for Tammy  
4 Baldwin. And, like I said earlier, met her at the  
5 conventions.  
6 Q. What year were the fundraisers?  
7 A. There may have been one in 2017. But  
8 most of them would have been 2018, I believe.  
9 Q. And were those all in Marshfield?  
10 A. In our area. One was in Spencer, which  
11 is part of our kind of broader community of  
12 interest.  
13 Q. Uh-huh.  
14 A. But I think at least two were in  
15 Marshfield.  
16 Q. That second bullet point you mention that  
17 you gathered signatures for nomination papers for  
18 Kathleen Rulka --  
19 A. Yes.  
20 Q. -- for assembly district 69. Tell me  
21 about that.  
22 A. Initially Kathleen was going to run for  
23 assembly district 69, and I helped circulate  
24 nomination papers for her. But then she did drop  
25 out of the race.

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1 Q. Do you know why she dropped out?  
2 A. I don't know exactly. Her husband was  
3 also running for Congress, and so it might have  
4 been time. And also, you know, I would estimate  
5 that it also was that that seemed more fruitless to  
6 try to run in the 69th assembly district as opposed  
7 to Brian's chances for Congress. So it was  
8 choosing where to put their energies.  
9 Q. Did she tell you that?  
10 A. No, no, I was just gathering that. But  
11 no, I don't know that first -- firsthand or  
12 anything. But when -- I did write her in as a  
13 candidate, and she did register then as a write-in  
14 candidate. But by then early voting was already  
15 underway, so it was not very successful.  
16 Q. Are any of these activities continuing  
17 now?  
18 A. No, because there's really not an  
19 election pending that I'm involved in. I did --  
20 since doing these responses, I did circulate a  
21 nomination paper for Judge Lisa Noy -- is it  
22 Neubauer?  
23 Q. Neubauer.  
24 A. Yeah. But that's not a political office  
25 per se, it's a nonpartisan office. But since doing

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1 these responses, I did circulate a nomination paper  
2 for her. And a friend is going to run as a  
3 write-in candidate for the school board, and so I  
4 may do some forwards of information about her for  
5 school board. But there's nothing other than that  
6 pending right now.  
7 Q. Sure. In any of these activities -- or I  
8 guess have you ever been involved in trying to  
9 recruit a candidate for political office?  
10 A. Not directly. I think I -- I talked to a  
11 friend who's a younger, politically active person  
12 who was also -- who grew up in Clark county, which  
13 was more of the heart of the 69th, and he now lives  
14 in Marshfield, if he would ever be interested. And  
15 as I recall he was like, you know, it's not -- it's  
16 a waste of time; I've got other things to do right  
17 now, to concentrate on, you know. So that's -- I  
18 don't know what efforts, other efforts, have been  
19 made. It's harder to get a candidate when you  
20 don't have a single unit for your county party.  
21 Q. Did this potential candidate tell you  
22 that he didn't want to run because it was a waste  
23 of time?  
24 A. It wasn't that formal. It was just like,  
25 you know, well, why don't you consider running type

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1 of thing. Just, you know -- 'cause he's  
2 politically active. And so it was not of interest  
3 to him to run with the way things are at present.  
4 Q. And when you say it was a waste of time,  
5 what do you mean?  
6 A. I think just that he's got other work to  
7 do and school loans to pay off and trying to run  
8 and, you know, spend time and money on an election  
9 in the 69th would not be worthwhile. He didn't --  
10 you know, I can't remember verbatim what he said,  
11 but it was something along those lines.  
12 Q. With any of these political activities,  
13 did you ever have discussions with anyone about the  
14 effect of Act 43 on the district?  
15 A. Oh, yeah.  
16 Q. Tell me about those.  
17 A. Well, one of the things we talk about  
18 quite frequently in the Democratic party office is  
19 how the line zigs through part of town. And in  
20 order -- when people would call in and say, you  
21 know, who are the candidates, they wouldn't even  
22 know who the candidates were for their district or  
23 which district they were in because of the way the  
24 dividing line kind of goes through and then jogs  
25 over and goes up. And so that's made it difficult.

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1 And we've talked about that being difficult for the  
2 community.  
3 Q. Do you remember how many people you've  
4 talked to about that?  
5 A. Off and on over the years, at the -- in  
6 the campaign office, maybe 15 to 20. It might be  
7 the same group, just a different repeated  
8 conversation. But that would always be a struggle.  
9 We'd have to go to the map and figure out where  
10 they were on the map. Whereas before, all of  
11 Marshfield was in one district.  
12 And it also came up when we were --  
13 when Dave Obey did the forum on gerrymandering and  
14 those issues came up. And one of my neighbors  
15 indicated that she talked with Robert Kulp, that if  
16 he was elected would he try to get the districts to  
17 be more fairly divided or, you know, boundary lines  
18 changed. And she said that he committed to do  
19 that. But he hasn't done anything. He's voted  
20 lockstep with the Republican party in preserving  
21 these maps.  
22 Q. Do you know when that was?  
23 A. I think it came up at that forum where  
24 Dave Obey was speaking.  
25 Q. And when was that?

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1 A. I didn't have notes on it. I had to look  
2 it up online, those things. And I think those were  
3 provided. But it was in 2011.  
4 Q. Okay.  
5 A. And that's when I think -- I don't have  
6 notes to make sure, but that's when I believe I  
7 heard my neighbor say that, that she talked with  
8 Robert Kulp directly about it.  
9 Q. Okay. Did anyone -- in the course of  
10 your political activities, did anyone ever tell you  
11 that they were reluctant to get involved because of  
12 Act 43 or the gerrymandering?  
13 A. No. But we get the sense that we don't  
14 get funding from the state organization because of  
15 it being a lost cause. That since -- since the  
16 redistricting, we're just not getting any attention  
17 from the state political party because it's not  
18 worthwhile for their resources.  
19 Q. When you say you get the sense that  
20 you're not getting the resources, what do you mean  
21 by that?  
22 A. Just nobody says it outright, but we're  
23 not getting resources. So if we have a campaign  
24 office, it's funded completely locally. And we're  
25 lucky to get a shirttail field representative from

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1 any of the parties to come in on occasion. Whereas  
2 before that, we would have a designated full-time  
3 field rep in our area to help with campaigns. So  
4 it's just the perception that we're not getting  
5 attention because of it being a lost cause.  
6 Q. Has anyone ever expressed concern that  
7 fellow Democrats in the area are not participating  
8 because of Act 43?  
9 A. Yeah, because if people don't perceive  
10 that they've got a connection to the  
11 representatives and don't have a representative  
12 who's really part of their area, they don't get as  
13 actively involved.  
14 Q. Uh-huh. All right. Let's look at  
15 interrogatory number eight, which reads, "Identify  
16 the people and/or groups with whom you want to  
17 associate but are allegedly burdened in doing so by  
18 Act 43." You want to look at your response there?  
19 A. Yep.  
20 Q. Is that complete and accurate?  
21 A. Well, interrogatory eight and nine were  
22 somewhat similar. And so interrogatory nine is  
23 kind of responsive to both of them, or my response  
24 there. I didn't reiterate everything in both  
25 places. So I would say that affiliate and

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1 associate are kind of a crossover. So the response  
2 to number nine is illustrative of the ways in which  
3 I felt like my ability to associate were affected  
4 in number eight.  
5 Q. All right. Well, let's look at number  
6 nine. "Please describe all the ways that Act 43  
7 has allegedly impaired your ability to affiliate  
8 with like-minded Democrats and pursue Democratic  
9 associational goals has been impaired by the  
10 current plan." And do you understand that to be a  
11 quote from your complaint?  
12 A. Yeah. Yes, I do.  
13 Q. And if you look at your response there,  
14 is that complete and correct?  
15 A. Yeah. Except that, you know, as -- I had  
16 forgotten to -- and I testified here today, about  
17 the way it affected our county party. And I didn't  
18 think of that when I was responding here. So that  
19 would be a supplement to this response: I talked  
20 about the county being divided, but not the effect  
21 on the county party itself.  
22 Q. And do you want to just summarize that  
23 again for me?  
24 A. That prior to Act 43, the Wood county  
25 party, Democratic party, was more of one unit and

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1 we had one assembly representative, one state  
2 senator and one congressional representative. And  
3 because of the division that occurred after that,  
4 we do have separate meetings to attend to the  
5 representation that way. And also we don't have a  
6 single county party then to get behind a candidate  
7 because of the fracture of the county.  
8 Q. Would you say there are fewer members of  
9 the Wood county Democrats after Act 43?  
10 A. I don't know if there are fewer members,  
11 but they're fragmented between the different  
12 districts.  
13 Q. And do the different districts have  
14 communication, though, the different -- the  
15 different, I don't know what you were calling them,  
16 but sections of the Wood County Democrats have  
17 communication?  
18 A. Every other meeting -- no, two or three  
19 meetings a year, there's a unified meeting. But  
20 they have different focuses because they have  
21 different candidates. Whereas before they had one  
22 candidate for all of those seats.  
23 Q. Would you say there are more members of  
24 the Wood County Democratic Party post-Act 43?  
25 A. I don't -- I don't know if there are more

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1 members. I think there were more members after the  
2 election in 2016. But I don't think -- I don't  
3 think there are members after Act 43, that I'm  
4 aware of.  
5 Q. And I think you told me about how many  
6 people come to the meetings. Do you have a sense  
7 for how many -- how many members there are of the  
8 Wood County Democratic Party?  
9 A. I don't know.  
10 Q. Okay.  
11 A. But for instance, last year there was,  
12 the part of Marshfield that's in 69, the part of  
13 Marshfield Wood county that's in 86, then part of  
14 it's in 70, part of it's in another district, I  
15 don't recall the number, that Dave Gorski was  
16 running for, and -- so it's just all split up. So  
17 the county doesn't have a way to get behind one  
18 candidate or to recruit a candidate.  
19 Q. All right. Interrogatory number ten,  
20 please describe all the ways in which Act 43 has,  
21 as alleged in paragraph 176 of your amended  
22 complaint, deterred or hindered you from "turning  
23 out to vote, registering voters, volunteering for  
24 campaigns, donating money to candidates, running  
25 for office, appealing for independent and

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1 advocating and implementing their preferred  
2 policies." And then you see your response there.  
3 Is that complete and accurate?  
4 A. Yeah, with what I supplemented today when  
5 I thought about the effect on the party, not just  
6 the county and Marshfield as a community.  
7 Q. Any other ways that Act 43 has impaired  
8 your ability to pursue your associational goals?  
9 A. As I indicated before, when we had the  
10 representative who was part of -- more part of our  
11 community and they were at functions in Marshfield,  
12 you'd see them and you could talk with them. And  
13 we don't have that as much anymore.  
14 Q. Would you say your current representative  
15 has never come to forums since Act 2011?  
16 A. I think he's been at the -- of course at  
17 the fair, but I don't remember -- remember seeing  
18 him. But as I indicated, I haven't been going to  
19 the governmental affair committee forums if they  
20 have them.  
21 Q. And is the fair every -- every year?  
22 A. Yes.  
23 Q. And then is the main place where  
24 candidates have forums through this organization  
25 that you used to be a member, the governmental

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1 affairs committee?  
2 A. That was largely the place. But without  
3 candidates having opposition, there's no forum.  
4 Q. Uh-huh. Were it not for Act 43, what  
5 kinds of political activities would you like to be  
6 engaging in that you can't?  
7 A. Pur -- having representatives that have a  
8 risk of losing their seat if they don't pay  
9 attention to all of the members of their district.  
10 If there is a district that's so secure that they  
11 don't feel the need to pay attention, not just a  
12 letter that says thank you for contacting me, but  
13 actually pay attention to what the members of the  
14 district are saying.  
15 That's frustrating, and has probably  
16 made it so that I don't bother contacting them  
17 because I feel like there's a fruitlessness in  
18 getting back any valid response or earnest  
19 response, because Robert Kulp has voted lockstep  
20 with the Republican party on everything since he  
21 was elected, despite promises at the beginning that  
22 he would be fair and listen to the voters. He has  
23 not. And so that's what I would do differently. I  
24 would see a reason to contact my representative,  
25 because I would perceive that they would be more

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1 responsive.  
2 Q. Okay. So more contact with your  
3 representative. What else?  
4 A. Well, as I indicated, senator -- state  
5 Senator Moulton has, to my knowledge, not been in  
6 Marshfield whatsoever. His area focuses Chippewa  
7 Falls just north of here. It's an hour-and-a-half,  
8 two-hour drive to Marshfield, so he's not there.  
9 It's the tail end of his district, so he didn't  
10 bother showing up. If he did, I didn't --  
11 certainly didn't hear about it.  
12 So, you know, I had regular contact  
13 with Amy Sue Vruwink and Julie Lassa, Donald  
14 Hasenohrl before them. I had regular contact with  
15 MaryAnn Lippert, though she was a Republican. And  
16 would see her in the community and talk about  
17 things with her. Even though she was of the other  
18 party, it was a more evenhanded district and she  
19 listened to us and responded.  
20 Q. Any other associational activities you'd  
21 like to engage but don't because of Act 43?  
22 A. I would say those are the main ones.  
23 Difficulty fielding candidates, difficulty getting  
24 support from the state. So that impacts all of our  
25 efforts.

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1 Q. Uh-huh. Has anyone ever punished you for  
2 engaging in your associational activities?  
3 A. If so, I haven't heard about it. There  
4 may have been people that decided they didn't want  
5 to have me as their attorney because they didn't  
6 like my political views. But I don't know of it  
7 per se.  
8 Q. Has anyone ever deterred or hindered your  
9 ability to vote?  
10 A. No.  
11 Q. How about has anyone ever deterred or  
12 hindered your ability to donate to candidates?  
13 A. I would say it's hampered by not having  
14 people running for the election. So I can't donate  
15 to someone who's not running. So that would be  
16 hampered. But no one said I can't donate, it's  
17 just that there's no one to whom I can donate.  
18 Q. How about has anyone ever deterred or  
19 hindered your ability to advocate for your  
20 policies?  
21 A. It's hindered by not having  
22 representatives who are going to be responsive to  
23 my concerns and needs. So I'm -- like I said, I  
24 don't bother contacting my representative very  
25 often, because it seems fruitless.

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1 Q. So it's the -- you feel that the success  
2 of your advocacy efforts is hindered?  
3 A. Success of my advocacy efforts, and also  
4 just having an earnest listening to my concerns,  
5 because there's no indication that my  
6 representative will vote any -- with anything other  
7 than the party with which he's affiliated. He has  
8 not stepped across any lines since he was elected.  
9 So there's a feeling of fruitlessness, like I said,  
10 in making any contact whatsoever.  
11 Q. But no one's stopped you from making the  
12 contacts?  
13 A. Right. Just hampered.  
14 MS. KECKHAVER: All right. I have no  
15 more questions.  
16 MS. HARLESS: Can we take a five-minute  
17 break?  
18 MS. KECKHAVER: Uh-huh.  
19 THE VIDEOGRAPHER: Going off the record  
20 at 10:34.  
21 (Break taken.)  
22 THE VIDEOGRAPHER: We're back on the  
23 record at 10:37.  
24 MS. HARLESS: For the record, no  
25 questions from me.

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1 MS. KECKHAVER: Okay.  
2 THE WITNESS: All right.  
3 MS. KECKHAVER: Thank you.  
4 THE WITNESS: You bet.  
5 THE VIDEOGRAPHER: Off the record at  
6 10:37. End of deposition. Media one of one.  
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1 STATE OF WISCONSIN )  
 ) ss.  
 2 COUNTY OF MILWAUKEE )  
 3 I, ANITA KORNBURGER, Registered  
 4 Professional Reporter and Notary Public in and  
 5 for the State of Wisconsin, do hereby certify  
 6 that the preceding deposition was recorded by  
 7 me and reduced to writing under my personal  
 8 direction.  
 9 I further certify that said deposition was  
 10 taken at 826 South Hastings Way, Eau Claire,  
 11 Wisconsin, on January 23, 2019, commencing at  
 12 8:58 a.m. and concluding at 10:37 a.m.  
 13 I further certify that I am not a relative  
 14 or employee or attorney or counsel of any of  
 15 the parties, or a relative or employee of such  
 16 attorney or counsel, or financially interested  
 17 directly or indirectly in this action.  
 18 In witness whereof, I have hereunto set my  
 19 hand and affixed my seal of office at  
 20 Milwaukee, Wisconsin, this 9th day of February,  
 21 2019.  
 22 \_\_\_\_\_  
 23 ANITA KORNBURGER, RPR - Notary Public  
 24 My commission expires May 24, 2021.  
 25

1 ACKNOWLEDGMENT OF DEPONENT  
 2  
 3 I, \_\_\_\_\_, do hereby  
 4 certify that I have read the foregoing pages, and that  
 5 the same is a correct transcription of the answers  
 6 given by me to the questions therein propounded, except  
 7 for the corrections or changes in form or substance, if  
 8 any, noted in the attached Errata Sheet.  
 9  
 10  
 11 \_\_\_\_\_  
 12 ANN STEVNING-ROE DATE  
 13  
 14  
 15 Subscribed and sworn to  
 16 before me on this \_\_\_\_ day  
 17 of \_\_\_\_\_, 20\_\_\_\_, by \_\_\_\_\_  
 18 \_\_\_\_\_,  
 19 proved to me on the basis of satisfactory  
 evidence to be the person(s) who appeared before me.  
 20  
 21 Signature \_\_\_\_\_  
 22  
 23  
 24  
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