

LEAGUE OF WOMEN VOTERS OF WISCONSIN
EDUCATION NETWORK, INC.

and

MELANIE G. RAMEY

Plaintiffs,

v.

Case no. 11-CV-4669

Case Code:

SCOTT WALKER, Governor

and

THOMAS BARLAND,

GERALD C. NICHOL,

MICHAEL BRENNAN,

THOMAS CANE,

DAVID G. DEININGER,

and

TIMOTHY VOCKE,

Members of the Government Accountability Board

Defendants.

REVISED *AMICUS CURIAE* BRIEF ON BEHALF OF THE WISCONSIN
DEMOCRACY CAMPAIGN

I. INTRODUCTION

This *amicus curiae* brief and the attached Affidavits are submitted on behalf of the Wisconsin Democracy Campaign (“WDC”) a nonprofit, nonpartisan political watchdog group dedicated to clean government. WDC advocates for a real democracy that allows the common good to prevail over narrow interests by reinforcing and protecting the values of honesty, fairness, transparency, accountability, citizen participation, competition, and respect for constitutional rights and the rule of law.

In pursuit of its mission, the WDC tracks the money in state politics, fights government corruption and works for campaign finance reform, fair elections, judicial integrity, media democracy, open and transparent government, and democracy reform in areas such as state legislative and congressional redistricting, ethics, and lobbying. WDC pursues these objectives through research, citizen education, community outreach, coalition building and direct advocacy.

WDC has more than 1500 members from across Wisconsin and is governed by a 14-member board of directors that includes representatives of a coalition of organizations that endorses WDC’s work. That coalition includes the following Wisconsin organizations:

1,000 Friends of Wisconsin

AARP (Wisconsin)

ABC for Health

AFT-Wisconsin

Alliance for Animals

American Association of University Women - WI

Associated Students of Madison

Burlington Area Progressives

Church Women United of Madison

Citizens for a Scenic Wisconsin

Citizens' Utility Board

Clean Water Action Council

Clean Wisconsin

Coalition for Wisconsin Health

Coalition of Independent Living Centers

Coalition of Wisconsin Aging Groups

Common Cause in Wisconsin

Cooperative Network

Disability Rights Wisconsin

Door County Environmental Council

John Muir Chapter of the Sierra Club

League of Women Voters of Wisconsin

Lutheran Office for Public Policy in Wisconsin

Madison Teachers Inc.

Madison Area Urban Ministry

Midwest Environmental Advocates

NASW Wisconsin

National Farmers' Organization - Wisconsin

Peace Action Wisconsin

Progressive Dane

River Alliance of Wisconsin

United Council of UW Students

Waukesha Area Citizens for Campaign Finance Reform

Wisconsin Audubon Council

Wisconsin Community Action Program Association (WISCAP)

Wisconsin Conference - United Church of Christ

Wisconsin Council on Children and Families

Wisconsin Homecare Organization

Wisconsin Interfaith Power & Light

Wisconsin League of Conservation Voters

Wisconsin Network for Peace and Justice

Wisconsin Public Interest Research Group

Wisconsin Retired Educators' Association

WDC is incorporated in the State of Wisconsin under Chapter 181, Wis. Stats. and is located at 215 N. Bassett Street in Madison, Wisconsin, where it maintains its offices. Michael McCabe is the Executive Director and Brynne McBride is the President of the Board of Directors.

WDC and its Board of Directors are on record in opposition to the policy of requiring eligible Wisconsin voters to show a state-issued photo identification card in order to cast a ballot.

II. ARGUMENT

There are two important and over-arching principles that should apply to voting. First, the right of suffrage must be as broad and as all encompassing as possible. The right to vote must be available to all persons who meet the qualifications of Article III of the Wisconsin Constitution: United States citizenship, age 18 and older, and residency in a Wisconsin election district.

Secondly, it must be straightforward, easy and understandable to exercise that right. Registration and voting must not be burdened with complex requirements and conditions.

Becoming eligible to vote and then doing so should not be complicated. It should not require time-consuming and onerous registration requirements, voting procedures, or photo identification. The more complicated it is, the more likely it is that fewer people will cast ballots.¹

Article III, Section 1 of the Wisconsin Constitution established three simple criteria for voting: Every 1) United States citizen; 2) who is age 18 or older; and 3) who is a resident of an election district in this state is a qualified elector of that district. No other qualifications are permitted.

Article III, Section 2, provides that laws may be enacted defining residency, providing for registration of electors, providing for absentee voting, excluding from the right of suffrage persons convicted of a felony or adjudged to

¹ See, e.g., "The Effect of Voter Identification Laws On Turnout", by Alvarez, et. al, Social Science Working Paper, California Institute of Technology, (October 2007, Revised January 2008). ("[w]e find that the strictest forms of voter identification requirements – combination requirements of presenting an identification card and positively matching one's signature with a signature either on file or on the identification card, as well as requirement to show - have a negative impact on the participation of registered voters relative to the weakest requirement, stating one's name.")

be incompetent, and extending the right of suffrage to additional classes of people, this last subject to ratification by the people at a general election.

Nothing in the Wisconsin Constitution permits the adoption or enforcement of a requirement that an elector produce photo identification as a qualification for casting a ballot.

There is a body of published academic research that concludes that the voting rights of both students and senior citizens are threatened by requirements that photo IDs be presented at the polling place.²

The Wisconsin Democracy Campaign believes that the requirement that a photo ID be produced in order to cast a ballot will adversely impact the rights of many to vote, including, in particular, students and senior citizens.

III. ACT 23 IMPOSES UNCONSTITUTIONAL REQUIREMENTS THAT WILL HINDER THE ABILITY OF STUDENTS TO CAST BALLOTS³

- A. Students whose only form of identification is a student ID will be adversely impacted by the requirement of a photo ID.

When 2011 Wisconsin Act 23 was adopted⁴, none of the colleges and universities in Wisconsin issued student IDs that included all of the requirements of Sections 1 and 2 of the Act. Most did not include expiration dates, and many do not include signatures or dates of issuance.⁵

² See, e.g., a memorandum submitted to the Wisconsin Government Accountability Board by a group of UW faculty members, found at http://gab.wi.gov/sites/default/files/story/uw_voter_id_memo_pdf_15200.pdf.

³ In support of the factual arguments in this section, see the Affidavit of Analiese Eicher, attached.

⁴ May 25, 2011

⁵ The Legislature included student IDs in the list of acceptable IDs in Act 23 under the following conditions: the photo identification card must be issued by a Wisconsin accredited university or college and contain a photo of the student, the signature of the student, the date of issuance, and an expiration date no more than two years after the date of issuance. Act 23, § 1

The result is that students who do not have a current Wisconsin operator's license or a valid Wisconsin ID card issued by the State of Wisconsin, or another acceptable indicator of identity which contains a photograph of the individual as required by Act 23⁶ will not be able to use their student IDs for the purpose of securing a ballot at the polls. This has led to efforts by public and private institutions to develop new photo IDs that are compliant with the law and acceptable to the Government Accountability Board ("GAB"). The UW system has made a good effort to ensure that students can obtain compliant student IDs. However, as of January 13, 2012, only five of 32 private schools had submitted proposed compliant student IDs to the Government Accountability board and only three had had their compliant student ID approved by the Government Accountability board.⁷ Similarly, only 4 of 40 technical schools have had their compliant student IDs approved by the GAB.⁸

A student who does not have any of the more common forms of acceptable photo ID, such as a compliant driver's license or state-issued identification card, must seek out the new acceptable student ID at the ID office on his or her campus. This requirement – go get an acceptable ID before one can vote – will lower voter turnout among students and have a chilling effect on participation in the democratic process, if, for no other reasons, finding the ID office, going there during hours of operation, and getting the card processed and

⁶ Act 23, §2

⁷ Communication and spreadsheet from Mike Haas, staff counsel, Government Accountability Board.

⁸ *Id.*

issued, is an imposition of time for busy students who are taking classes and working two or three jobs.

Undoubtedly, some students will show up at the polls and seek to cast a ballot and then be denied the right of doing so because they lack acceptable photo IDs. Because no IDs have been required in the past, let alone photo IDs, students will not bring one, they will forget, or they will not know that one is required. Additionally students will show up at the polls with their regular student ID not realizing that they needed to obtain a compliant student ID in order to exercise their right to vote. Once again, some of those who show up without the necessary ID will be frustrated or discouraged by the process required, at what is then the last minute for that student, to get a valid photo ID and then return to the polls, and will thus choose not to vote simply because of the inconvenience and hassle-factor.

B. The Requirement that a Voter using a Student ID Must Show Proof of Current Enrollment is an Additional Unconstitutional Requirement.

As if the requirement for a photo ID was not enough, the Act requires, in Sections 1 and 33m, an additional requirement for students (and only for students) that is not in the Wisconsin Constitution. If the student presents a student ID that complies with the requirements of the law, he or she must also present proof of current enrollment in the college or university that issued the student ID.

There is nothing in the law that describes what can or cannot be accepted as proof of enrollment. This means that two students who attend the same school

but live in different municipalities may be subject to different and inconsistent standards when they try to show proof of enrollment. One may be permitted to vote, and the other may not, even though both meet the three requirements of Section III of the Wisconsin Constitution: both are U.S. citizens, both are over 18 years of age, and both are residents of Wisconsin.

There is an additional problem: While students typically carry their student IDs with them, they rarely have proof of enrollment. As a practical matter, the student ID serves that purpose. They now will have to somehow obtain separate documentation that serves this purpose and will be satisfactory to the poll worker, who will judge it with no standards or criteria.

Furthermore, the student who uses a valid driver's license to vote does not have to show any proof of enrollment, while her roommate who uses acceptable student ID must show proof of enrollment. Just as the Wisconsin Constitution does not require a photo ID, it does not require proof of enrollment for some potential electors who happen to be students.

The right of every eligible elector to cast a ballot is at the very heart of our representative democracy. Different standards for eligibility to cast a ballot should not apply to different potential electors, whether they are students or not. All potential electors should be required to meet the same basic and simple eligibility requirements. The requirement that a photo ID (and in some cases proof of current enrollment) must be produced in order to vote is in violation of the standards established by Section III of the Wisconsin Constitution.

IV. ACT 23 IMPOSES UNCONSTITUTIONAL REQUIREMENTS THAT WILL HINDER THE ABILITY OF SENIOR CITIZENS TO CAST BALLOTS⁹

An estimated 23 percent of persons aged 65 and over do not have a Wisconsin drivers license or a photo ID.¹⁰ This represents more than 177,000 people, 70 percent of whom are women.¹¹ They no longer drive, so they have given up their operator's licenses, and they do not have photo IDs issued by the State of Wisconsin or any other entity. They have had no need for photo IDs. There is no occasion in the lives of most seniors when they are ever asked to show a photo ID, and so they do not have one.

Senior citizens, like other voters, have not previously been required to show any ID to vote, let alone a photo ID. If they are United States citizens, are over 18 years of age, and meet the residency requirements, and are registered, they are permitted to cast a ballot. No other requirement has been imposed on them.

Many seniors in every community continue to live independently, but they may be frail and have health problems. They are often relatively isolated and depend on family, volunteers or other services for transportation. It is often difficult for them to arrange transportation, and when they do, they are dependent on the schedule of their drivers.

⁹ In support of the factual arguments presented in this section, see the Affidavit of Ingrid Thompson, attached.

¹⁰ John Pawasarat, "The Driver License Status of the Voting Age Population in Wisconsin," University of Wisconsin-Milwaukee Employment and Training Institute, www.eti.uwm.edu, June, 2005..

¹¹ *Id.*

Many volunteer drivers or other senior transportation services do not have the time it may take to drive a senior to the nearest DMV office to get a photo ID and then wait an indeterminate time for the return trip. Drivers may not be able to do it in the limited hours that the nearest DMV office is open, or may not be able to go at times when the DMV office is less crowded and the wait is shorter. Advocates have been told that the least crowded times in DMV offices are the middle of the week in the middle of the month. That is a narrow window in which to find transportation for a trip that may take several hours if the wait at the DMV office is long. The result is that many seniors are not able to get to a DMV office to get a photo ID.

For example, a senior who lives in McFarland and is blind recently was able to arrange a trip to the DMV office. It took more than three hours for him to get his photo ID; because of incontinence, need for medications, and frailty, many of the seniors who are helped by senior advocates across the state cannot wait that long.

Some senior citizens do not have birth certificates. They do not know how to get them, or were born in other states and understand it may takes weeks to get a birth certificate from that state, and have no other proof that they are who they say they are that meets the requirements of Act 23 for getting a photo ID.¹²

Once a senior has his or her photo ID, and if that elector is not registered to vote, he or she must then go register. This again presents all of the difficulties

¹² See Trans 102.15(3), Wis. Admin. Code, for requirement that a birth certificate is required as proof of identity to acquire a state-issued ID card under s. 343.50, Wis. Stats.

of getting transportation, going out on slippery sidewalks, and getting to the local clerk's office to register to vote.

The new requirements of Act 23 are complex, scary, and intimidating to many frail and isolated senior citizens. They do not understand the requirements and fear that they will not do whatever they are supposed to do correctly. Whether they go to the polls to register and vote, or just to vote, many seniors are afraid that if they show up on election day they may not be allowed to do so because they do not have the proper documents with them showing identification and residency. They fear being turned away and embarrassed in public. Social workers, health care workers, advocates, and others who work with seniors are being told by seniors that the photo ID requirement is too much trouble: it is just too complicated, intimidating, and time-consuming and, as a result, they will not vote, even though they have in the past and want to in the future. The law is having a chilling effect on them.

The problems presented by the photo ID requirement for seniors are compounded many times for seniors of color, particularly those who have lived through an era where people of color, especially African-Americans, were intimidated and threatened if they tried to vote, had poll taxes imposed on them, and found little support in the law. They are likely to be even more intimidated by the Act 23 requirements and consequently less likely to vote.

V. CONCLUSION

Those who drafted the Wisconsin Constitution included three conditions for eligibility to vote. The Constitution has not been amended by the voters to

provide that these three conditions – citizenship, age, and residency – should be augmented with a fourth – the showing of a photo ID.

The photo ID requirement strikes at the very heart of this state's democratic traditions and practice. It will prevent some people from being able to cast a ballot, and it will discourage many others from even attempting to do so.

The Wisconsin Democracy Campaign respectfully urges this Court to declare that it is unconstitutional under Section III of the Wisconsin Constitution to require the showing of a photo ID to cast a ballot in any local, state or federal election in the State of Wisconsin.

Dated this 31ST day of January, 2012.

Garvey McNeil & Associates, S.C.

Attorneys for Wisconsin Democracy Campaign

By



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STATE OF WISCONSIN

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Members of the Government Accountability Board

Defendants.

AFFIDAVIT OF MIKE MCCABE

Mike McCabe, being first duly sworn, on oath states as follows:

1. I am the Executive Director of the Wisconsin Democracy Campaign, which is a nonprofit, nonpartisan political watchdog group dedicated to

clean government. We advocate for a real democracy that allows the common good to prevail over narrow interests by reinforcing and protecting the values of honesty, fairness, transparency, accountability, citizen participation, competition, and respect for constitutional rights and the rule of law.

2. In pursuit of its mission, the Wisconsin Democracy Campaign tracks the money in state politics, fights government corruption and works for campaign finance reform, fair elections, judicial integrity, media democracy, open and transparent government, and democracy reform in areas such as state legislative and congressional redistricting, ethics, and lobbying. We pursue these objectives through research, citizen education, community outreach, coalition building and direct advocacy.
3. WDC has more than 1500 members from across Wisconsin and is governed by a 14-member board of directors that includes representatives of a coalition of organizations that endorses WDC's work. That coalition includes the following Wisconsin organizations:

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Coalition for Wisconsin Health
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Madison Teachers Inc.
Madison Area Urban Ministry
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NASW Wisconsin
National Farmers' Organization
- Wisconsin
Peace Action Wisconsin
Progressive Dane
River Alliance of Wisconsin
United Council of UW Students
Waukesha Area Citizens for
Campaign Finance Reform
Wisconsin Audubon Council
Wisconsin Community Action
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Wisconsin Conference - United
Church of Christ
Wisconsin Council on Children
and Families
Wisconsin Homecare
Organization
Wisconsin Interfaith Power &
Light

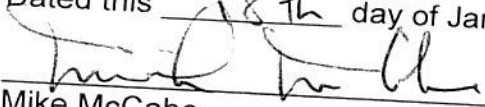
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Wisconsin Network for Peace
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Wisconsin Public Interest
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Wisconsin Retired Educators'
Association

4. WDC is incorporated in the State of Wisconsin under Chapter 181, Wis. Stats and is located at 215 N. Bassett Street in Madison, Wisconsin, where it maintains its offices. Brynne McBride is the President of the Board of Directors.
5. WDC and its Board of Directors are on record in opposition to the policy of requiring eligible Wisconsin voters to show a state-issued photo identification card in order to cast a ballot.
6. The Voter ID law will adversely impact our members and members of the organizations listed above in the following ways:
 - a. It will reduce citizen participation in elections and undermine basic principles of fairness and transparency that are hallmarks of a vibrant representative democracy.
 - b. The Voter ID law will disenfranchise some of our members and residents of Wisconsin by making it impossible for those who do not have the requisite photo identification documents to vote in local, state, and federal elections.
 - c. Some of our members are frail elderly citizens who do not have a photo ID, because they have no need for one, and it is difficult for them to arrange transportation to travel to a location where they can secure a valid photo ID.
 - d. There are U.S. citizens, over the age of 18, who reside in Wisconsin and are otherwise eligible voters, but who do not have a photo ID and do not have, and cannot readily get, birth certificates, which are often required to get a photo ID.
 - e. There are otherwise eligible voters in Wisconsin who are on fixed limited incomes and cannot readily afford the fees that are charged to secure needed identification and thus cannot secure a required photo ID card and will not be allowed to vote.

7. WDC was formed in 1995 and has closely monitored elections in Wisconsin since that time, and has seen no evidence of widespread voter fraud or even *de minimis* attempts by ineligible voters to cast ballots.
8. The voter ID law will create unnecessary and illegal obstacles to people wishing to exercise their right and obligation to vote and will discourage and or prevent many members of certain classes of people from voting, including students, senior citizens, people of color, those with disabilities and those who are poor.
9. WDC believes that the Voter ID law violates Article III of the Wisconsin constitution in that it creates an unlawful qualification to vote that is not enumerated in, and accordingly is prohibited by, the Wisconsin Constitution.
10. The interest that WDC claims in this action is that the right to cast a ballot is a fundamental right in our system of democracy. It is the very essence of our democracy, and it should not be denied because of one's inability to produce a photo ID that meets the criteria of Act 23.

Further Affiant sayeth not.

Dated this 18th day of January, 2012.


Mike McCabe

STATE OF WISCONSIN)

COUNTY OF DANE) : ss.

Personally came before me this 10 day of January, 2012 the above named Mike McCabe known to me to be the person who signed the foregoing instrument and acknowledged the same.



Notary Public, State of Wisconsin

My Commission expires is permanent

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Members of the Government Accountability Board
Defendants.

AFFIDAVIT OF ANALIESE EICHER

Analiese Eicher, being first duly sworn, on oath states

1. She is employed as the Government Relations Director for the United Council of UW Students, which has offices at 14 W. Mifflin St., Suite 212, Madison, WI 53703.

2. The United Council of UW Students is a statewide advocacy and organizing not-for-profit organization that was established in 1960 to represent all students of the UW System and advocate for them on issues of higher education pertaining to value, quality, and the student experience.
3. One of the priorities of United Council is advocating for civic participation by students, including ensuring that as many students as possible are able to cast ballots in local, state, and federal elections in Wisconsin.
4. On behalf of the United Council and UW students on all of the system's campuses, she has been active in efforts to educate members of the Legislature, the members and staff of the Government Accountability Board, the UW system, and students about the consequences that Act 23 will have on students in Wisconsin. She has studied the language of the Act, read and written numerous analyses of it, and spoken with people across the state about the law. In particular, she has talked with students about the problems the law may present when they seek to cast a ballot.
5. The requirements of 2011 Wisconsin Act 23 will make it more difficult for many students in Wisconsin to vote, particularly those who do not have a valid Wisconsin Operator's license, a valid Wisconsin-issued identification card, a passport or another approved form of proof of identification. When Act 23 was adopted, none of the colleges and universities in Wisconsin issued student IDs that met the requirements of Act 23.
6. Students who do not have a form of ID that complies with the requirements of Act 23 will be required to secure a compliant student ID, available only if their college or university issues compliant IDs, in order to be permitted to vote.
7. She is informed and believes that not all colleges and universities in Wisconsin are developing and seeking approval for compliant student IDs, with the result that some students who want to cast ballots will not be able to do so because they will not have compliant photo ID cards.
8. She is informed and believes that none of the public universities in Wisconsin plan to automatically provide new compliant IDs to students. Because they must include a photograph, students seeking the new ID will have to learn where to go on campus to get it, and then take the time to go there and wait for the card to be produced. For busy students attending class, studying, and holding down one or more jobs, this is an onerous imposition that will deter some students from voting.
9. Very few students routinely carry with them or even possess proof of their current enrollment in the college or university that issued that student's

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AFFIDAVIT OF INGRID THOMPSON

Ingrid Thompson, being first duly sworn, on oath states as follows:

1. She is the Director of the Village of McFarland Senior Center and actively involved in county and statewide senior issues. As such, she is the Chair of the Wisconsin Association of Senior Center Legislative Committee, a member of the Dane County Area on Aging Legislative Committee, and a member of the Wisconsin Aging Network Committee.
2. One of the objectives of most senior centers is to encourage seniors to be engaged in the civic process – to follow the news, to voice their opinions on issues of concern, and to vote. Senior center directors, staff and professionals working with seniors in variety of organizations across Wisconsin are concerned that the requirements of Act 23 are discouraging seniors from voting, rather than encouraging them.
3. In all of her various roles, she has closely followed the issues associated with the requirements of 2011 Wisconsin Act 23 requiring potential electors to show a photo ID in order to vote, and the impact of that law on senior citizens, as well as the efforts of senior and advocates for seniors across the state to work with the Government Accountability Board (GAB), the Division of Motor Vehicles (DMV), Department of Transportation (DOT), and local clerks to implement the law so that that its impact on seniors is mitigated.
4. She has talked with many seniors and advocates for seniors and believes that the requirements of Act 23 will adversely impact voting by seniors. Turnout by seniors will be diminished from what it would be otherwise, and some seniors who have voted in the past will not be able to vote because they cannot, or fear they cannot, meet the requirements of Act 23.
5. Many seniors do not have photo IDs. They no longer drive, so they have given up their operator's licenses, and they do not have Photo IDs issued by the State of Wisconsin or any other entity. There are few occasions in the lives of most seniors when they are ever asked to show a photo ID, and so they do not have one. In addition, they may not have proof of residency because acceptable documents are in the name of their spouse or other family members.
6. Senior citizens, like other voters, have not previously been required to show any ID to vote, let alone a photo ID. They are United States citizens, they are over 18 years of age, and they meet the residency requirements. No other requirement has been imposed on them.
7. Many seniors continue to live independently, but they are often frail, have health problems, are relatively isolated, and depend on family, volunteers or other services for transportation. It is often difficult for

them to get transportation, and when they do, they are dependent on the schedule of their drivers. Many drivers do not have the time it may take to drive a senior to the nearest DMV office to get a photo ID, may not be able to do it in the limited hours that the nearest DMV office is open, or may not be able to go at times when the DMV office is less crowded and the wait is less. She has been told that the least crowded times in a DMV office are the middle of the week in the middle of the month. That is a narrow window in which to find transportation for trips that may take several hours if the wait at the DMV office is long. The result is that many seniors are not able to get to a DMV office to get a photo ID. Specialized transportation is costly and often has limited availability throughout Wisconsin, especially in the rural areas. Seniors are reluctant to arrange for specialized transportation, even for medical appointments, because of the high costs.

8. A senior living in McFarland who is blind and has other health issues recently was able to arrange a trip to the DMV office. It took more than three hours for him to get his photo ID. Because of incontinence, need for medications, and frailty, many of the seniors who are helped by senior advocates across the state cannot wait that long.
9. Senior citizens across the state have told advocates in the aging network, at their local senior centers, or those who provide in-home help to seniors that they do not have birth certificates and do not know how to get them, or were born in other states, and understand it may take weeks to get a birth certificate from that state, and have no other proof that they are who they say they are or to verify their date of birth. Both are needed to meet the requirements of Act 23 for getting a photo ID. The expense of getting a birth certificate is also be a financial hardship for many seniors.
10. Once a senior has his or her photo ID, and if that elector is not registered to vote, he or she must then go register. This again presents all of the difficulties of getting transportation, going out on slippery sidewalks or inclement weather, and getting to the local clerk's office to register to vote.
11. The new requirements of Act 23 are complex, scary, and intimidating to many frail and isolated senior citizens. They do not understand the requirements and fear that they will not do whatever they must do correctly. Whether they go to the polls to register and vote, or just to vote, many seniors are afraid that if they show up on election day, they will not be allowed to do so because they do not have the proper documents with them showing identification and residency. They fear being turned away and embarrassed in public. Social workers, health care workers, advocates, and others who work with seniors are being

12. The problems for seniors that she has described are compounded many times for seniors of color, particularly those who have lived through an era where people of color, especially African-Americans, were threatened if they tried to vote, had poll taxes imposed on them, and so forth. They are likely to be even more intimidated by the Act 23 requirements and consequently less likely to vote.

Dated this 18 day of January, 2012.

STATE OF WISCONSIN)
COUNTY OF DANE) ss

Notary Public, State of Wisconsin

My Commission expires is permanent