

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

Donald J. Trump, Candidate for President  
of the United States of America,

Plaintiff,

vs.

Case No. 2:-20-cv-01785-BHL

The Wisconsin Elections Commission, and its  
members, Ann S. Jacobs, Mark L. Thomsen,  
Marge Bostelman, Dean Knudson, Robert F.  
Spindell, Jr., in their official capacities, Scott  
McDonell in his official capacity as the Dane  
County Clerk, George L. Christenson in his  
official capacity as the Milwaukee County Clerk,  
Julietta Henry in her official capacity as the  
Milwaukee Election Director, Claire Woodall-  
Vogg in her official capacity as the Executive  
Director of the Milwaukee Election Commission,  
Mayor Tom Barrett, Jim Owczarski, Mayor Satya  
Rhodes-Conway, Maribeth Witzel-Behl, Mayor  
Cory Mason, Tara Coolidge, Mayor John  
Antaramian, Matt Krauter, Mayor Eric Genrich,  
Kris Teske, in their official Capacities; Douglas J.  
La Follette, Wisconsin Secretary of State, in his  
official capacity, and Tony Evers, Governor of  
Wisconsin, in his Official capacity.

Defendants.

**PLAINTIFF’S EXHIBIT LIST**

Plaintiff Donald J. Trump, by counsel, identifies the exhibits he presently intends to use at the hearing in this matter pursuant to paragraph 1 of the Court’s Order Establishing Exhibit Procedures of December 8, 2020 (Doc. 63). Plaintiff presently expects to offer the following exhibits:

## Exhibits

1	Assembly Speaker Calls for Investigation of Wisconsin Election
2	Guidance Indefinitely Confined Electors, <i>Wisconsin Election Commission</i> – March 29, 2020
3	Scott McDonnell Facebook post regarding important voting information
4	Absentee Voters in Milwaukee, Dane Counties can say they’re ‘Indefinitely Confined’ and skip photo ID, clerks say, <i>Milwaukee Journal Sentinel</i> – March 25, 2020 updated March 26, 2020
5	Rep. Jim Steineke and Sen. Roger Roth: All mail ballot proposal: return to sender, <i>State Journal</i> – Apr. 20, 2020
6	Republicans say thousands in Wisconsin may have circumvented voter ID requirement, by <i>Zackary Halaschak Breaking News Reporter</i> – Nov. 10, 2020
7	Report of Commission on Federal Election Reform – Sept. 2005
8	Federal Prosecution of Election Offenses – Dec. 2017
9	Voting Fraud is a Real Concern, <i>Opinion by John R. Lott, Jr., President, Crime Prevention Research Center</i> – August 4, 2020
10	As More Vote by Mail, Faulty Ballots Impact Election, <i>New York Times</i>
11	Top Battlegrounds Page, <i>RealClear Politics</i>
12	Wisconsin Safe Voting Plan, <i>Center for Tech and Civic Life</i> – June 15, 2020
13	Absentee Drop Box Guidance, <i>Wisconsin Elections Commission</i> – August 19, 2020
14	Absentee Drop Box Information, <i>Wisconsin Elections Commission</i> – August 19, 2020
15	Ballot Drop Box, CISA
16	Ballot Drop Boxes offer a “Safe Place” for voting, <i>Wisconsin Center for Investigative Journalism</i>
17	Search for a Ballot Drop Box using this Tool, <i>Wisconsin Watch</i>
18	Drop Box List, <i>Wisconsin Elections Commission</i>
19	Drop Box Information, Hayward Wisconsin, <i>Wisconsin Watch</i>
20	Drop Box Menasha Library, <i>Wisconsin Watch</i>
21	Drop Box Information City of Vermont Dane County, <i>Wisconsin Watch</i>
22	Drop Box Information Village of DeForest Dane County, <i>Wisconsin Watch</i>
23	Drop Box Information Village of Boyd, <i>Wisconsin Watch</i>
24	Milwaukee gears up for historic election in which 70% of voters may not cast a ballot, <i>Milwaukee Journal Sentinel</i> – Sept. 15, 2020
25	Milwaukee Absentee Ballot Drop Boxes Replaced this Week with Permanent Versions, <i>Milwaukee Journal Sentinel</i> – Oct. 27, 2020
26	City of Madison Unveils Secure Absentee Ballot Drop Boxes, <i>City of Madison Clerk</i> – October 16, 2020
27	Drop Box Information City of Madison Dane County, <i>Wisconsin Watch</i>
28	CTCL partners with 5 Wisconsin cities to Implement Safe Voting Plan, <i>Center for Tech and Civic Life</i> – July 7, 2020
29	Voter turnout in Madison, Dane County Surpasses record 2016 Numbers, <i>City of Madison by Vanessa Reza</i> – Nov. 4, 2020

30	84% of registered voters in Green Bay voted in election, <i>Green Bay Press- Gazette</i> - Nov. 3, 2020 updated Nov. 4, 2020
31	CTCL Receives 250M Contribution to Support Critical Work of Election Officials from Priscilla Chan and Mark Zuckerberg, <i>Center for Tech and Civic Life</i> – Sept. 1, 2020
32	WEC Prepares for Fall Elections by Approving Block Grants to Municipalities and Mailing to Voters, <i>Wisconsin Elections Commission</i> - May 29, 2020
33	Affidavit of Bartholomew R. Williams and Jean M. Bury Weymier
34	Affidavit of Anne Marie Klobuchar
35	Spoiling Absentee Ballot Guidance, <i>Wisconsin Elections Commission</i> – Oct. 19, 2020
36	Uniform Instructions for Wisconsin Absentee Voters, <i>Wisconsin Elections Commission</i>
37	What Poll Watchers Can and Can’t do at Wisconsin Voting Sites, <i>Milwaukee Journal Sentinel</i> – Oct. 20, 2020
38	Affidavit of Beth A. Brown
39	Affidavit of Mary Angelina Horn
40	Affidavit of Charles A. Armgardt
41	Affidavit of Steven S. Goetz
42	Affidavit of Lana Sloane
43	Affidavit of Kyle Hudson
44	Affidavit of Jeremy Bowers
45	Q&A with Meagan Wolfe, <i>The Capitol Times</i> – Sept. 8, 2020
46	WEC CARES Subgrant Program Announcement – June 17, 2020
47	Article and Photograph of Oshkosh City Hall, <i>Oshkosh Northwestern</i> - Oct. 18, 2020
48	Photograph of Oshkosh City Hall – 2020
49	Madison City Clerk Tweet – Sept. 25, 2020
50	Madison City Clerk Tweet – Sept. 25, 2020
51	Not Used
52	Wisconsin Republicans tried to stifle plan, <i>Business Insider</i> – Sept. 26, 2020
53	City of Madison PowerPoint Presentation on Democracy in the Park - Fall 2020
54	Photograph of Duffle Bags from City of Madison PowerPoint Presentation on Democracy in the Park - Fall 2020
55	Madison’s “Democracy in the Park” Event Seems Legal, Says Top Elections Official, <i>Spectrum News 1</i> – Oct. 1, 2020
56	Video from Madison’s “Democracy in the Park” Event Seems Legal, Says Top Elections Official, <i>Spectrum News 1</i> – Oct. 1, 2020
57	Photograph of Madison’s “Democracy in the Park” Event Seems Legal, Says Top Elections Officials, <i>Spectrum News 1</i> – Oct. 1, 2020
58	Absentee Ballot Drop Boxes Available at 15 locations across the City, Including 13 Milwaukee Public Library Branches, <i>City.Milwaukee.gov, Press Release</i> – Sept. 10, 2020
59	Madison Receives Nearly 11K Absentee Ballots at Collection Event, <i>Wisconsin Public Radio</i> – Sept. 28, 2020
60	City’s Ballot Boxes Getting Heavy Use, <i>Urban Milwaukee</i> – Oct. 6, 2020

61	Committee moves forward with grants to help bolster voting access, security, <i>City.Milwaukee.gov, Common Council Press Release – July 21, 2020</i>
62	Affidavit of Claire Woodall-Vogg – Nov. 27, 2020
63	Milwaukee Election Results Expected Around 4 a.m., <i>Urban Milwaukee – Nov. 3, 2020</i>
64	Milwaukee’s Central Count facility will tabulate votes in three shifts on Election Day, <i>Milwaukee Journal Sentinel – Nov. 1, 2020</i>
65	Audio for Radio Ad for Democracy in the Park by Joe Biden for President
66	Plaintiffs Submission of Excerpts from Wisconsin Election Code
67	Wisconsin Elections Commission Question and Answers with Clerks
68	WEC’s Responses to Plaintiff’s Requests for Admissions and Document Requests
69	Tweet by Madison Clerk identifying ballots returned via drop box Oct. 28, 2020
70	“Organizing and Processing Absentee Ballots” Screenshot from WEC Training Video
71	“WEC Clerks Training Video 2020”
72	WEC Response to Discovery Request No. 1 Concerning Absentee Ballot Drop Boxes – Sept. 26, 2020
73	WEC Response to Discovery Request No. 2 Concerning Altering Absentee Ballot Certifications – Sept. 18, 2020
74	WEC Response to Discovery Request No. 3 Concerning Public Access
75	Affidavit of David Bolter

As specified in the Court’s Order, the foregoing list does not include exhibits that may be relied upon for impeachment or rebuttal nor does it include demonstrative aids or summaries. Plaintiff further reserves the right to rely upon any matter as to which the Court may take judicial notice.

Respectfully Submitted,

KROGER, GARDIS & REGAS, LLP

/s/ William Bock, III

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**CERTIFICATE OF SERVICE**

A copy of the foregoing document was served upon all parties' counsel of record via this Court's CM/ECF service on this 9th day of December, 2020.

/s/ William Bock, III