

4. I have also read the fact section of the “Complainants’ Reply (Kenosha)” Brief in Brian Thomas, et al. v. Meagan Wolfe, et al. EL 21-30.
5. I have consulted the CTCL Expenses Spreadsheet attached as Exhibit A to the Affidavit of Carol Stancato.
6. I am aware that the Complainants allege that the City treated those in the City differently on the basis of whether they are historically disenfranchised, and specifically on the basis of race.
7. Though the Wisconsin Safe Voting Plan does mention serving “Historically Disenfranchised Residents[,]” that was not accomplished through racial or ethnic classifications. In practice, we sought to ensure that all City voters had equal access to City communications regarding elections. We did this in multiple ways, including the following.
 - A. As opposed to discriminating against various classes of people, we sought to ensure equal access to City elections communications by using means of communication that would reach everybody. Therefore, we used online means along with print means, such as posting on City buses, so that regardless of an individual’s level of access to technology, they had an opportunity to receive City elections communications. We sought to prevent those with less access to technology from being disenfranchised.
 - B. We placed City elections billboard advertisements at major intersections across the City. We did not place them in select communities based on their racial or ethnic makeup.
 - C. We offered voting information to all, on an equal basis, we did not restrict our assistance to certain racial or ethnic groups. Specifically, we did not provide

information as to which documents were and were not required to vote to certain groups to the exclusion of others.

8. The City did not use “Care-a-Vans” or any other van or bus service to bring people to the polls for the November 2020 election.
9. The City did not employ or use voter navigators.
10. The City did not employ geo-fencing.
11. The City did not spend CTCL grant money on any project where the primary goal was to drive up the City’s total voter turnout.
12. The City Clerk-Treasurer’s Office did not hand over any election administration duties to the Center for Tech & Civic Life (herein “CTCL”), nor did CTCL wrest control of election duties from the City. This is exemplified by the Clerk-Treasurer’s Office declining a number of CTCL’s suggestions on how to conduct various election processes. For example, CTCL suggested allowing voting in the park, a new absentee envelope design, a new ballot insert letter, and that we get an elections Facebook page; but we did none of those things.
13. The vendors the City used and paid with CTCL grant funds were not exclusively made up of parties recommended by CTCL.
14. We did not call ourselves part of the Wisconsin five in any official communications.
15. CTCL did not determine how the City utilized its poll workers on election day, and I am not aware of any poll workers provided by CTCL.
16. CTCL did not determine whether to accept ballots after the deadline to submit them, and the City did not accept ballots after the deadline.
17. I know of no CTCL staff members who came to the City to assist the City on election day.

18. We, in the Clerk-Treasurer's Office, understood the Wisconsin Safe Voting Plan to provide guidelines on CTCL grant expenditures, rather than as an all-inclusive and exhaustive list of how to use CTCL grant funds.
19. We, in the Clerk-Treasurer's Office, shared with our staff, volunteers, and Chief Election Inspectors how we were able to pay for all of the new election equipment and the processes we were able to implement for the August and November 2020 elections. The existence of the grant was common knowledge amongst our office staff, volunteers, and Chief Election Inspectors.
20. To the best of my recollection, Mr. Michael Spitzer-Rubenstein was not involved in any City of Kenosha elections.
21. Items purchased with the CTCL grant were used in the August 2020 and November 2020 elections in the City of Kenosha.

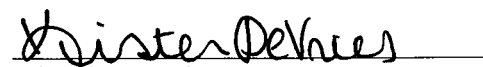
I, Christina Oppenneer, being first duly sworn on oath state that I personally read the above affidavit, and that the above statements are true based on my personal knowledge and, as to those stated on information and belief, I believe them to be true.

Dated this 24th day of September, 2021.



CHRISTINA OPPENNEER
Legal Assistant
Kenosha City Attorney's Office

Subscribed and sworn to before me
this 24th day of September, 2021


Kirsten DeVries
Notary Public, Kenosha County, WI.
My Commission expires on March 27, 2025

