

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

TIMOTHY CAREY, MARTHA
CHAMBERS, SCOTT LUBER,
MICHAEL REECE,

Plaintiffs,

v.

WISCONSIN ELECTIONS
COMMISSION, MEAGAN WOLFE, in
her official capacity as Administrator of
WEC

Defendants.

No. 3:22-cv-00402

Judge _____

DECLARATION OF WISCONSIN VOTER MARTHA CHAMBERS

I, MARTHA CHAMBERS, hereby declare as follows:

1. I am a 59-year-old-woman who lives in Milwaukee, Wisconsin. I have lived in Milwaukee for around 30 years.
2. I vote in nearly every election, whether local, state, or federal.
3. Twenty-seven years ago, I was thrown from a horse. I have since been paralyzed from the neck down. My paralysis prevents me from using my arms or legs without assistance. I cannot move them by myself. I use a power wheelchair that I operate with my head. Due to my paralysis, the limitations on my mobility and the difficulty of accessing an in-person polling place make it difficult for me to vote in-person.

4. For example, even if I were able to get to a polling place, I would not be able to use an accessible voting machine because I have no use of my hands. In addition, I have found it difficult to get into my polling place.

5. Since 2014, and because of my paralysis, I have used an absentee ballot to vote in local, state, and federal elections that I have voted in. I automatically receive an absentee ballot at my home for each election. And for each election cycle, I require assistance returning my absentee ballot.

6. Once the ballot arrives at my home, I use a pen that I can put in my mouth to fill out my ballot.

7. Once the ballot is filled out, I cannot return my ballot without assistance. Because of my paralysis, I am not able to hold the ballot in my hand to open a door to a mail carrier, place it in a mailbox, or hand it directly to the municipal clerk.

8. During the November 2020 general election, I voted absentee, and my ballot was returned by a third party.

9. During the April 2022 Wisconsin local election, because I was confused as to what was and was not lawful, I voted absentee, and used a third-party to return my ballot by placing it in the mail.

10. For the upcoming November 2022 general election, I plan to vote via absentee ballot

11. However, if I am unable to use the assistance of a third party to return my ballot, I will not be able to cast an absentee ballot.

I, MARTHA CHAMBERS, hereby declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of July, 2022 at Milwaukee, Wisconsin.

/s/ Martha Chambers
Martha Chambers

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