

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 MICHAEL REECE

I, MICHAEL REECE, hereby declare as follows:

1. I am a 67-year-old-man who lives in Sun Prairie, Wisconsin. I have lived in Sun Prairie since 2007.
2. I vote in nearly every election, whether local, state, or federal.
3. I live with Cerebral Palsy. Cerebral Palsy is a motor disability that affects my ability to move and maintain balance and posture.
4. My Cerebral Palsy limits my ability to move and use my limbs. I require 24 hour care, seven days a week.
5. My Cerebral Palsy has progressed in recent years. And, in 2003, I was involved in a car crash, which paralyzed me from the chest down. Despite that, I continued to attempt to travel to my polling place on election day and cast my ballot in person.

6. I have repeatedly encountered in-person polling obstacles that have burdened my ability to cast an in-person ballot. When I go to my polling place, I require a particular, accessible, voting machine to cast my vote. On election day in 2016, I was informed that the machine was not at my polling place and was actually broken. I left, unable to vote. Then, in 2018, I was informed that the polling place no longer had the voting machine at all. Again, I left. That time, I then reached out to a disability advocacy organization who ultimately worked with the polling place to track down the proper voting machine so I could cast my ballot. These obstacles have left me discouraged. So now (and since 2019) I rely on absentee ballot voting because I do not want to risk my opportunity to vote if the proper equipment is not available on election day.

7. Due to the difficulty in voting in-person, I no longer do so, and, since 2020, I have exclusively used an absentee ballot to vote in every local, state, and federal election rather than leave it to chance whether my polling place would have the necessary devices for me to vote on election day.

8. When I vote absentee, I require assistance in requesting an absentee ballot.

9. Once the ballot arrives at my home, I am unable to, by myself, get the absentee ballot from my mailbox, and my wife collects the ballot from the mail.

10. Once the ballot is in my house, I am unable to fill out the absentee ballot by myself. On my behalf, my wife fills out the ballot with my preferred candidates. I

then review the selections for accuracy to ensure my preferred candidates have been properly voted.

11. Once the ballot is filled out and sealed, I cannot return my ballot without assistance. Because of my Cerebral Palsy and paralysis, I am not able to hold the ballot in my hand or open doors to deliver it to a mail carrier, place it in a mailbox, or hand it directly to the municipal clerk.

12. Due to my Cerebral Palsy, my wife has returned my ballot to the clerk and cast my absentee ballot on my behalf in every election that I have voted in in the past three years.

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

14. During the April 2022 Wisconsin local election, I did not vote.

15. For the November 2022 general election, I intend to cast my vote through the absentee ballot program.

16. However, if my wife, or someone else in her place, is not able to return my ballot, I will not be able to cast a vote in either the primary election or the general election this year.

I, MICHAEL REECE, hereby declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of July, 2022 at Sun Prairie, Wisconsin.

/s/ Michael Reece
Michael Reece