

**WISCONSIN CIRCUIT COURT  
WAUKESHA COUNTY**

<p>Concerned Veterans of Waukesha County c/o Ken Marek 745 E. Imperial Dr. Hartland WI 53029</p> <p>Ken Marek 745 E. Imperial Dr. Hartland WI 53029</p> <p>Tom Gudex 7051 Parkview Ave. Lannon WI 53046</p> <p>Janel Brandtjen N52 W16632 Oak Ridge Trail Menomonee Falls, WI 53051,</p> <p style="text-align: center;">Plaintiffs</p> <p style="text-align: center;">v.</p> <p>Wisconsin Election Commission 212 Washington Avenue, Third Floor P.O. Box 7984 Madison WI 53707-7984</p> <p style="text-align: center;">Defendant</p>	<p style="text-align: right;">Case Code: Case Type:</p> <p style="text-align: center;">Case No. _____</p>
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**AFFIDAVIT OF HEATHER HONEY**

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I, Heather Honey, being first duly sworn on oath, state as follows:

1. I am the President of Haystack LLC an investigations and consulting firm.

2. In July 2022, I reviewed the UOCAVA data submitted to the EAC by all jurisdictions in the state of Wisconsin. Review of that data shows that the number of UOCAVA voters more than doubled from 2016 to 2020.
3. According to DoD report on the military population, the total number of active duty military and their dependents decreased between 2016 and 2020.
4. According to the US State Department and the IRS, the total number of overseas non-military US citizens decreased from 2016 to 2020.
5. On July 13, 2022, I submitted a Freedom of Information Act “FOIA” request to Karen Stritchko, the Deputy City Clerk of the City of South Milwaukee. Included in that FOIA was a request for an electronic copy of the records of all UOCAVA eligible voters by precinct as of July 1, 2022.
6. It is my understanding that the clerk is required to maintain a complete, verified, current list of all military electors. It is my understanding that clerks are also required to obtain information from all non-military UOCAVA voters so that they are able to verify identity and eligibility.
7. In response to my FOIA, the Deputy City Clerk of South Milwaukee informed me that she does not have access to a list of UOCAVA voters. She said that the information was only available from the Wisconsin Elections Commission. That email response is attached.
8. On July 13, 2022, I submitted a FOIA request to Toya Harrell, the Village Clerk of Shorewood, Wisconsin. Included in that FOIA was a request for an electronic copy of the records of all UOCAVA eligible voters by precinct as of July 1, 2022.
9. I received confirmation of receipt of that Village of Shorewood FOIA request but have not received a response to the request.



**From:** Karen Stritchko <[REDACTED]@smwi.org>  
**Sent:** Wednesday, July 13, 2022 1:16 PM  
**To:** [REDACTED]  
**Cc:** Karen Kastenson  
**Subject:** RE: [EXTERNAL] FOIA UOCAVA Records

*Good afternoon,*

*In response to your records request below, items number 1 – 3 should be addressed at [badgervoters.wi.gov](http://badgervoters.wi.gov) for that information as we do not have access to that information on our level.  
Item 4 would be the procedures outlined in the Manual – link below.*

[https://elections.wi.gov/sites/elections/files/2022-02/UOCAVA%20Manual%202022\\_0.pdf](https://elections.wi.gov/sites/elections/files/2022-02/UOCAVA%20Manual%202022_0.pdf)

*Items 5 and 6 do not apply to us as those ballots are not tabulated separately.*

*Thank you.*

*Karen Stritchko  
Deputy City Clerk  
City of South Milwaukee  
414-762-[REDACTED]*

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**From:** foia@verityvote.us <foia@verityvote.us>  
**Sent:** Wednesday, July 13, 2022 9:04 AM  
**To:** Milwaukee\_Municipalities@mail.com  
**Subject:** [EXTERNAL] FOIA UOCAVA Records

Please provide the following electronic records:

1. Records of all UOCAVA eligible voters by precinct as of July 1, 2022.
  2. Total number of UOCAVA eligible voters in each precinct as of July 1, 2022.
  3. Total number of UOCAVA eligible voters in each precinct as of November 3, 2020.
  4. Procedures, guidelines, or instructions for the processing of UOCAVA voters' ballots including receipt of FWABs, duplication, tabulation, and retention.
  5. If UOCAVA voters' ballots are tabulated separately, please provide the records showing the results of that tabulation for the 2021 Spring Election and the 2020 General Election.
  6. If UOCAVA voters' ballots are not tabulated separately, please so state.
- Date range: 10/01/2020 to 07/01/2022

Thank you,  
Heather

