

1 **A That's fine.**
 2 **Q** The Kenosha County Republican Party.
 3 **A Yes.**
 4 **Q** What do you do as an occupation?
 5 **A Well, my husband and I own a small business so**
 6 **we're small business owners. I am also a**
 7 **Kenosha County Board supervisor, and I'm also**
 8 **a freelance graphic designer.**
 9 **Q** Graphic designer?
 10 **A Yes.**
 11 **Q** Who do you design for?
 12 **A All different clients. Mostly political**
 13 **clients.**
 14 **Q** Is it online stuff, is it print stuff, is it
 15 all of the above?
 16 **A Print. Some online but mostly print.**
 17 **Q** Your highest level of education?
 18 **A I have an associate's degree.**
 19 **Q** What's that in?
 20 **A Graphic design.**
 21 **Q** And I should have asked you what your address
 22 is, as well.
 23 **A 706 North School Street, Silver Lake,**
 24 **Wisconsin, 53170.**
 25 **Q** Just so I don't have to ask it later, you're a

5

1 supervisor for Kenosha County. What district
 2 do --
 3 **A 22. Sorry.**
 4 **Q** You're helping me out already. Other than
 5 your counsel, who did you discuss today's
 6 deposition with?
 7 **A I think my husband and my daughter.**
 8 **Q** What was the extent of the discussion?
 9 **A I just told --**
 10 MR. FERNHOLZ: Wait. I'm going to
 11 object to the extent there is any discussions
 12 between you and your husband, don't discuss
 13 those. Those are privileged under the spousal
 14 privilege.
 15 THE WITNESS: Okay. All I was going
 16 to say is I told him I have a deposition and
 17 I'm coming up here. That's all.
 18 BY MR. TERRY:
 19 **Q** For the record, he's not a party to this
 20 action?
 21 **A Correct.**
 22 **Q** What did you tell your daughter about today's
 23 deposition?
 24 **A Same thing, that I wasn't going to be home**
 25 **because I had to be here.**

6

1 **Q** Just in relation to the County Party, who have
 2 you discussed this litigation with relative to
 3 the County Party?
 4 **A Well, it would be the entire County Party**
 5 **board because it involves the County Party**
 6 **website. In general, Gabe Nudo, who is the**
 7 **vice chair, usually stepped out and, I guess**
 8 **you could say, recused himself from the**
 9 **discussions.**
 10 **Q** And that's based on a relationship with my
 11 office, correct?
 12 **A Exactly.**
 13 **Q** So other than Gabe Nudo, when is the last
 14 discussion you had with anyone relative to the
 15 County Party about this litigation?
 16 **A Are you speaking -- I mean, if you are**
 17 **speaking about billing, that would be last**
 18 **month; but specifics of the actual case,**
 19 **probably about a year ago, roughly. It's been**
 20 **a long time that we've actually discussed the**
 21 **case.**
 22 **Q** After some of the other County Party members
 23 were dismissed from the action?
 24 **A Yes. It was basically an update that these**
 25 **people got dismissed, and then when the other**

7

1 **people got dismissed, things like that.**
 2 **Q** Just so I drill down a bit here. For today's
 3 purposes, have you discussed this matter with
 4 Kevin Mathewson at all?
 5 **A Recently?**
 6 **Q** I'm just talking about today's deposition.
 7 **A Oh, no.**
 8 **Q** Same question as to Mike Skalitzky?
 9 **A No.**
 10 **Q** Did you discuss what was attempted to be
 11 Mr. Skalitzky's deposition last week?
 12 **A He called me and asked me what it was about,**
 13 **and I explained it was about this case and**
 14 **that's it. I didn't explain to him anything**
 15 **more.**
 16 **Q** Did he ask you to provide him any documents in
 17 response to his deposition?
 18 **A No.**
 19 **Q** And then Andrew Ellinger. That's
 20 E-L-L-I-N-G-E-R. I believe you know
 21 Mr. Ellinger?
 22 **A Correct.**
 23 **Q** And he was scheduled for a deposition last
 24 week as well. You're aware of that?
 25 **A Yes.**

8