

STATEMENT OF NONAPPEARANCE
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November 17, 2021

WISCONSIN STATE ASSEMBLY
2021-2022 REGULAR SESSION
ASSEMBLY COMMITTEE ON CAMPAIGNS AND ELECTIONS

Deposition of Vanessa Chavez,

Wednesday, November 17, 2021

at

REGUS
200 South Executive Drive
Suite 101
Brookfield, Wisconsin 53005

Stenographically reported by:
Maria V. Camera, Court Reporter

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1 STATEMENT OF NONAPPEARANCE of VANESSA
2 CBAVEZ, a witness, was taken at the instance of the
3 WISCONSIN OFFICE OF THE SPECIAL COUNSEL, under and
4 pursuant to the provisions of Chapter 804 of the
5 Wisconsin Statutes, and pursuant to Subpoena, before me,
6 MARIA V. CAMERA, Court Reporter and Notary Public in and
7 for the State of Wisconsin, at REGUS, 200 South
8 Executive Drive, Suite 101, Brookfield, Wisconsin 53005,
9 on the 17th day of November, 2021, commencing at
10 10:20 a.m. and concluding at 10:23 a.m.

11
12 APPEARANCES
13 MOHRMAN, KAARDAL & ERICKSON, P.A. by
14 Mr. Nicholas Morgan
15 150 South Fifth Street, Suite 3100
16 Minneapolis, Minnesota 55402
17 appeared on behalf of
18 WISCONSIN OFFICE OF THE SPECIAL COUNSEL.


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1 STATE OF WISCONSIN)
) SS
2 MILWAUKEE COUNTY)
3 I, MARIA V. CAMERA, Court Reporter, and
4 Notary Public in and for the State of Wisconsin, do
5 hereby certify that the preceding statement was recorded
6 by me and reduced to writing under my personal
7 direction.

8 I further certify that said Statement of
9 Nonappearance was taken before me at REGUS, 200 South
10 Executive Drive, Suite 101, Brookfield, Wisconsin 53005,
11 on the 17th day of November, 2021, commencing at
12 10:20 a.m. and concluding at 10:23 a.m.

13 I further certify that I am not a
14 relative or employee or attorney or counsel of any of
15 the parties, or a relative or employee of such attorney
16 or counsel, or financially interested directly or
17 indirectly in this action.

18 In witness whereof, I have hereunto set
19 my hand and affixed my seal of office at Milwaukee,
20 Wisconsin, on this 22nd day of November, 2021.

21 *Maria Vittoria Camera* 

22 MARIA V. CAMERA - Notary Public
23 In and for the State of Wisconsin
24 My commission expires January 25, 2023.
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1 TRANSCRIPT OF PROCEEDINGS
2 MR. MORGAN: My name is Nick Morgan,
3 attorney appearing from Mohrman, Kaardal & Erickson
4 on behalf of the Wisconsin Office of the Special
5 Counsel. It is Wednesday, November 17th, 2021,
6 10:21 a.m., and in response to our subpoena, the
7 Most Knowledgeable Person from the City of Green
8 Bay has failed to appear to answer questions from
9 myself or members of the Special Counsel.

10 I, and the court reporter, waited for the
11 parties to check in at Suite 101, 200 South
12 Executive Drive, Brookfield, Wisconsin, for one
13 hour and twenty minutes. This is in addition to
14 four other Most Knowledgeable People from two
15 different cities and two different commissions that
16 failed to show up yesterday, Tuesday,
17 November 16th, 2021: The Most Knowledgeable Person
18 from the City of Milwaukee, the Most Knowledgeable
19 Person from the Milwaukee Election Commission, the
20 Most Knowledgeable Person from the City of Madison,
21 and the Most Knowledgeable Person from the
22 Wisconsin Election Commission.

23 This is to note that none of these
24 requested people showed up, and we will take
25 further actions to get compliance at a future date.

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1	actions 3:25	compliance 3:25	F
101 3:11 4:10	addition 3:13	concluding 4:12	failed 3:8,16
10:20 4:12	affixed 4:19	counsel 3:5,9 4:14,16	financially 4:16
10:21 3:6	appearing 3:3	COUNTY 4:2	future 3:25
10:23 4:12	attorney 3:3 4:14,15	court 3:10 4:3	G
16th 3:17	B	D	Green 3:7
17th 3:5 4:11	Bay 3:8	date 3:25	H
2	behalf 3:4	day 4:11,20	hand 4:19
200 3:11 4:9	Brookfield 3:12 4:10	direction 4:7	hereunto 4:18
2021 3:5,17 4:11,20	C	directly 4:16	hour 3:13
2023 4:24	CAMERA 4:3,22	Drive 3:12 4:10	I
22nd 4:20	certify 4:5,8,13	E	indirectly 4:17
25 4:24	check 3:11	Election 3:19,22	interested 4:16
5	cities 3:15	employee 4:14,15	J
53005 4:10	City 3:7,18,20	Erickson 3:3	January 4:24
A	commencing 4:11	Executive 3:12 4:10	K
a.m. 3:6 4:12	commission 3:19,22 4:24	expires 4:24	Kaardal 3:3
action 4:17	commissions 3:15		Knowledgeable

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<p>3:7,14,17,18, 20,21</p>	<p>P</p>	<p>S</p>	<p>Wednesday 3:5</p>
<p>M</p>	<p>parties 3:11 4:15</p>	<p>seal 4:19</p>	<p>whereof 4:18</p>
<p>Madison 3:20</p>	<p>people 3:14,24</p>	<p>set 4:18</p>	<p>Wisconsin 3:4,12,22 4:1, 4,10,20,23</p>
<p>MARIA 4:3,22</p>	<p>Person 3:7,17,19,20, 21</p>	<p>show 3:16</p>	<p>writing 4:6</p>
<p>members 3:9</p>	<p>personal 4:6</p>	<p>showed 3:24</p>	<p>Y</p>
<p>Milwaukee 3:18,19 4:2,19</p>	<p>preceding 4:5</p>	<p>South 3:11 4:9</p>	<p>yesterday 3:16</p>
<p>minutes 3:13</p>	<p>PROCEEDINGS 3:1</p>	<p>Special 3:4,9</p>	
<p>Mohrman 3:3</p>	<p>Public 4:4,22</p>	<p>SS 4:1</p>	
<p>Morgan 3:2</p>	<p>Q</p>	<p>State 4:1,4,23</p>	
<p>N</p>	<p>questions 3:8</p>	<p>statement 4:5,8</p>	
<p>Nick 3:2</p>	<p>R</p>	<p>subpoena 3:6</p>	
<p>Nonappearance 4:9</p>	<p>recorded 4:5</p>	<p>Suite 3:11 4:10</p>	
<p>Notary 4:4,22</p>	<p>reduced 4:6</p>	<p>T</p>	
<p>note 3:23</p>	<p>REGUS 4:9</p>	<p>TRANSCRIPT 3:1</p>	
<p>November 3:5,17 4:11,20</p>	<p>relative 4:14,15</p>	<p>Tuesday 3:16</p>	
<p>O</p>	<p>reporter 3:10 4:3</p>	<p>twenty 3:13</p>	
<p>office 3:4 4:19</p>	<p>requested 3:24</p>	<p>W</p>	
	<p>response 3:6</p>	<p>waited 3:10</p>	