

# **Exhibit 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICK HARLAN, et al.,	)	
	)	
Plaintiffs,	)	Case No. 1:16-cv-7832
	)	
v.	)	Hon. Samuel Der-Yeghiayan
	)	
CHARLES W. SCHOLZ, Chairman, Illinois State Board of Elections, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF JOSEPH TABOR**

I, Joseph Tabor, declare as follows:

1. On August 2, 2016, I sent Freedom of Information Act (“FOIA”) requests to the FOIA officers for the county clerks of Carroll County, Illinois; Fulton County, Illinois; Jo Daviess County, Illinois; Stephenson County, Illinois; Warren County, Illinois; Henderson County, Illinois; and Crawford County, Illinois.

2. My FOIA requests respectively requested, for each county, “all records regarding [the county’s] implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.”

3. In response to each of these requests, I received an emailed response from the counties’ respective clerks’ offices informing me that the counties do not provide voter registration at precinct polling places. True and accurate copies of these responses are attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 9, 2016

A handwritten signature in black ink, appearing to read "Joseph Tabor", written over a horizontal line.

Joseph Tabor



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request

---

**kendra strauch** <ccclerk3@carroll-county.net>  
To: jtabor@libertyjusticecenter.org

Mon, Aug 1, 2016 at 12:01 PM

Joseph,

In Carroll County, same day voter registration on Election day is only done here at the County Clerk's office - Courthouse, 301 N Main, Mt Carroll IL from 6:00 a.m. to 7:00 p.m. No other voter registration is done at any other polling locations/precincts.. If you need anything else, please let me know.

Thank you,

\*\*\*\*\*

Kendra Strauch

Deputy Clerk - Carroll County

301 N. Main, Po Box 152

Mt. Carroll IL 61053

[1-815-244-0222](tel:1-815-244-0222)

---

**From:** Brian Woessner [mailto:[ccclerk1@carroll-county.net](mailto:ccclerk1@carroll-county.net)]  
**Sent:** Monday, August 01, 2016 11:37 AM  
**To:** [ccclerk3@carroll-county.net](mailto:ccclerk3@carroll-county.net)  
**Subject:** FW: FOIA Request

**From:** Joseph Tabor [mailto:[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)]

**Sent:** Monday, August 01, 2016 11:12 AM

**To:** [ccclerk1@carroll-county.net](mailto:ccclerk1@carroll-county.net)

**Subject:** FOIA Request

[Quoted text hidden]

!DSPAM:579f750c118273558661945!



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request Fulton County

2 messages

---

**Joseph Tabor** <jtabor@libertyjusticecenter.org>  
To: jnelson@fultonco.org

Mon, Aug 1, 2016 at 12:00 PM

Hello,

This is a request for information under the Illinois Freedom of Information Act (5 ILCS 140).

Please provide all records regarding Fulton County's implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.

If Fulton County is opting not to provide Election Day registration at all polling places, you may just let me know that instead of providing any documents.

I will expect to receive your response within five business days, as required by the statute (5 ILCS 140/3(d)).

Thank you very much for your assistance.

Joe Tabor

--

**Joseph E. Tabor**  
Associate  
Liberty Justice Center

190 South LaSalle Street  
Suite 1500  
Chicago, Illinois 60603

Phone: (312) 346-5700 Ext. 239  
Cell: (314) 413-4700  
[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)  
[libertyjusticecenter.org](http://libertyjusticecenter.org)

**Policy changes lives. Find out more about our work for liberty in Illinois at [www.illinoispolicy.org](http://www.illinoispolicy.org) .**

---

**James Nelson** <jnelson@fultonco.org>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>

Mon, Aug 1, 2016 at 12:59 PM

Fulton County does not do Election Day Voter Registration at any of the polling places.

Jim Nelson

Fulton County Clerk & Recorder

100 Main - P.O. Box 226

Lewistown, IL 61542

Phone 309-547-3041 Ext 117

Fax 309-547-3326

<mailto:jnelson@fultonco.org>

---

**From:** Joseph Tabor [<mailto:jtabor@libertyjusticecenter.org>]

**Sent:** Monday, August 01, 2016 12:01 PM

**To:** James Nelson

**Subject:** FOIA Request Fulton County

[Quoted text hidden]



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request Jo Daviess County

2 messages

---

**Joseph Tabor** <jtabor@libertyjusticecenter.org>  
To: countyclerk@jodaviess.org

Mon, Aug 1, 2016 at 4:00 PM

Ms. Dimke,

This is a request for information under the Illinois Freedom of Information Act (5 ILCS 140).

Please provide all records regarding Jo Daviess County's implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.

If Jo Daviess County is opting not to provide Election Day registration at all polling places, you may just let me know that instead of providing any documents.

I will expect to receive your response within five business days, as required by the statute (5 ILCS 140/3(d)).

Thank you very much for your assistance.

Joe Tabor

--

**Joseph E. Tabor**  
Associate  
Liberty Justice Center

190 South LaSalle Street  
Suite 1500  
Chicago, Illinois 60603

Phone: (312) 346-5700 Ext. 239

Cell: (314) 413-4700

[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)

[libertyjusticecenter.org](http://libertyjusticecenter.org)

**Policy changes lives. Find out more about our work for liberty in Illinois at [www.illinoispolicy.org](http://www.illinoispolicy.org) .**

---

**Dimke, Jean** <jdimke@jodaviess.org>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>

Tue, Aug 2, 2016 at 9:57 AM



Jo Daviess County does not provide for election day voter registration at polling locations. We provide grace period voting on election day at the County Clerk's Office, 330 N Bench St. Galena.

Jean Dimke

Jo Daviess County Clerk/Reocrder

**From:** Joseph Tabor [mailto:[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)]  
**Sent:** Monday, August 01, 2016 4:01 PM  
**To:** countyclerks  
**Subject:** FOIA Request Jo Daviess County

[Quoted text hidden]

### Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request Stephenson County

---

Vici Otte <votte@co.stephenson.il.us>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>

Mon, Aug 1, 2016 at 12:28 PM

Mr. Tabor,

In light of the population of Stephenson County we only offer Election Day voter registration in the Election Authorities Office.

Please let me know if you need any additional information.

Sincerely,

Vici Otte  
Stephenson County Clerk  
50 W Douglas Street  
Suite 500  
Freeport, IL 61032  
815-235-8289

**From:** Joseph Tabor [mailto:[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)]  
**Sent:** Monday, August 01, 2016 11:47 AM  
**To:** [votte@co.stephenson.il.us](mailto:votte@co.stephenson.il.us)  
**Subject:** FOIA Request Stephenson County

[Quoted text hidden]



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request Warren County

2 messages

---

**Joseph Tabor** <jtabor@libertyjusticecenter.org>  
To: kchillon@hotmail.com

Mon, Aug 1, 2016 at 11:50 AM

Hello,

This is a request for information under the Illinois Freedom of Information Act (5 ILCS 140).

Please provide all records regarding Warren County's implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.

If Warren County is opting not to provide Election Day registration at all polling places, you may just let me know that instead of providing any documents.

I will expect to receive your response within five business days, as required by the statute (5 ILCS 140/3(d)).

Thank you very much for your assistance.

Joe Tabor

--

**Joseph E. Tabor**  
Associate  
Liberty Justice Center

190 South LaSalle Street  
Suite 1500  
Chicago, Illinois 60603

Phone: (312) 346-5700 Ext. 239  
Cell: (314) 413-4700  
[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)  
[libertyjusticecenter.org](http://libertyjusticecenter.org)

**Policy changes lives. Find out more about our work for liberty in Illinois at [www.illinoispolicy.org](http://www.illinoispolicy.org) .**

---

**Chillon** <kchillon@hotmail.com>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>

Tue, Aug 2, 2016 at 8:53 AM

Mr. Tabor,

Thank you for your recent request for records regarding Warren County's implementation of Election Day voter registration pursuant to the Freedom of Information Act. I forwarded your request on to Tina Conard, Warren County Clerk. She has informed me that Election day voter registration will only be held in the Warren County Clerk's Office.

Please let me know if you have any questions.

Chillon Stacker

Warren County FOIA Officer

[cstacker@9thjudicial.org](mailto:cstacker@9thjudicial.org) or [kchillon@hotmail.com](mailto:kchillon@hotmail.com)

100 West Broadway

Monmouth, IL 61462

---

**From:** Joseph Tabor <[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)>

**Sent:** Monday, August 1, 2016 11:50 AM

**To:** [kchillon@hotmail.com](mailto:kchillon@hotmail.com)

**Subject:** FOIA Request Warren County

[Quoted text hidden]



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

## FOIA Request Crawford County

2 messages

---

**Joseph Tabor** <jtabor@libertyjusticecenter.org>  
To: elections@crawfordcountyclerk.net

Mon, Aug 1, 2016 at 1:57 PM

Hello,

This is a request for information under the Illinois Freedom of Information Act (5 ILCS 140).

Please provide all records regarding Crawford County's implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.

If Crawford County is opting not to provide Election Day registration at all polling places, you may just let me know that instead of providing any documents.

I will expect to receive your response within five business days, as required by the statute (5 ILCS 140/3(d)).

Thank you very much for your assistance.

Joe Tabor

--

**Joseph E. Tabor**  
Associate  
Liberty Justice Center

190 South LaSalle Street  
Suite 1500  
Chicago, Illinois 60603

Phone: (312) 346-5700 Ext. 239  
Cell: (314) 413-4700  
[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)  
[libertyjusticecenter.org](http://libertyjusticecenter.org)

**Policy changes lives. Find out more about our work for liberty in Illinois at [www.illinoispolicy.org](http://www.illinoispolicy.org) .**

---

**Linda Staley** <elections@crawfordcountyclerk.net>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>  
Cc: Fayrene Wright <countyclerk@crawfordcountyclerk.net>

Wed, Aug 3, 2016 at 9:49 AM

Crawford County will provide Election Day registration **only** at the County Clerk's office.

Linda Staley

618-546-1212 or 618-544-2590

**From:** Joseph Tabor [<mailto:jtabor@libertyjusticecenter.org>]

**Sent:** Monday, August 01, 2016 1:57 PM

**To:** Linda Staley

**Subject:** FOIA Request Crawford County

[Quoted text hidden]



Joseph Tabor <jtabor@libertyjusticecenter.org>

---

**RE: FOIA Request Henderson County Clerk**

1 message

---

**Amanda Rousonelos** <coclerk@mchsi.com>  
To: Joseph Tabor <jtabor@libertyjusticecenter.org>

Tue, Aug 9, 2016 at 12:12 PM

Mr. Tabor,

At this time, Election Day voter registration is offered in my office only. Please let me know if you have any further questions.

Thank you,

Amanda Rousonelos

Henderson County Clerk

---

**From:** Joseph Tabor [mailto:[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)]

**Sent:** Monday, August 01, 2016 11:23 AM

**To:** [coclerk@mchsi.com](mailto:coclerk@mchsi.com)

**Subject:** FOIA Request Henderson County Clerk

Hello,

This is a request for information under the Illinois Freedom of Information Act (5 ILCS 140).

Please provide all records regarding Henderson County's implementation of Election Day voter registration at all precinct polling locations pursuant to 10 ILCS 5/4-50.

If Henderson County is opting not to provide Election Day registration at all polling places, you may just let me know that instead of providing any documents.

I will expect to receive your response within five business days, as required by the statute (5 ILCS 140/3(d)).

Thank you very much for your assistance.

Joe Tabor

--

**Joseph E. Tabor**

Associate

Liberty Justice Center

190 South LaSalle Street

Suite 1500

Chicago, Illinois 60603

Phone: (312) 346-5700 Ext. 239

Cell: (314) 413-4700

[jtabor@libertyjusticecenter.org](mailto:jtabor@libertyjusticecenter.org)

[libertyjusticecenter.org](http://libertyjusticecenter.org)

**Policy changes lives. Find out more about our work for liberty in Illinois at [www.illinoispolicy.org](http://www.illinoispolicy.org) .**