

DECLARATION OF SEAN DORN

SEAN DORN, being duly sworn under penalty of perjury, declares that the following is true and correct:

1. I am a registered voter.
2. On April 22, 2008, I went to my precinct in Philadelphia County at 8:30 a.m. to cast my ballot in Pennsylvania's primary election.
3. When I arrived, I learned that both of the voting machines at my precinct were broken and non-operational.
4. I joined a long line of individuals waiting to cast ballots.
5. I did not know how long I would need to wait before I could cast my ballot.
6. At no time did the poll workers offer me or the other voters in line an emergency paper ballot, even though 100% of the voting machines at my precinct were not functioning.
7. I waited in line nearly an hour to cast my vote.
8. I suffered a significant hardship in waiting nearly an hour to cast my vote.
9. I observed other individuals leaving my precinct before voting.
10. Some of these individuals stated that they could not wait indefinitely for the voting machines to be fixed.
11. I believe these and other individuals at my precinct were effectively disenfranchised by the non-operational voting machines and the lack of access to emergency paper ballots.
12. I fully intend to vote in the election on November 4, 2008.
13. Based on my experience during the April 2008 primary, I am worried that the voting machines at my precinct are likely to be non-operational for at least part of the day, that

there will be long lines, and that individuals including myself will not have access to emergency paper ballots.

14. If the voting machines break down at my precinct on election day and if I am denied access to an emergency paper ballot, I may be denied my fundamental right to vote.

15. If even one voting machine breaks down at my precinct on election, there will be very long lines at my precinct.

16. On November 4, 2008, I may not be able to wait over an hour to cast my ballot due to work and family obligations.

17. I declare that the foregoing is true and correct to the best of my knowledge.

Dated: October 15, 2008
New York, New York


SEAN DORN