

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA,  
Plaintiff

**DECLARATION OF  
JEANNIE DEAN**

v

Case No. 06-CV-0263  
(GLS)

NEW YORK STATE BOARD OF ELECTIONS;  
PETER KOSINSKI and STANLEY L. ZALEN,  
Co-Executive Directors of the New York State  
Board of Elections, in their official capacities; and,  
STATE OF NEW YORK,  
Defendants

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Pursuant to 28 U.S.C. sec 1746, **JEANNIE DEAN**, declares as follows:

1. I, Jeannie Dean, am a member of Video the Vote, [www.videothevote.org](http://www.videothevote.org), a non-partisan citizen based independent media outlet committed to documenting through video any irregularities that occur at polling places and boards of elections while they are happening, enabling the media and public to watch-dog the electoral process across the United States of America. Video the Vote was formed in response to the many problems witnessed in the 2000 and 2004 elections at the polls: long lines, eligible voters turned away, voter intimidation, misallocation and malfunctioning of voting equipment.

2. On Election Day 2006, I was dispatched by Video the Vote to Sarasota County in Florida that became a “district of interest” when hundreds of voters complained they had trouble voting for the 2004 Democratic Congressional Candidate-- possibly swinging an election won by 369 votes to the wrong candidate.
3. I have accumulated over 33 videos from the Sarasota County Election of 2006 in which 18,412 votes disappeared from the District 13 Congressional Race between Christine Jennings-(D) and Vern Buchanan-(R). The results from ES&S’s paperless iVotronic machines left the county with an undervote rate of 14.9%-- approximately 1 in every 7 ballots dropped: a highly unusual and suspect rate compared to the other counties.
4. Video footage also includes the malfunctioning voting equipment of iVotronic machines; the refusal of ES&S to release their source codes to test software for flaws and review the ballots cast; security seals snapping off of ballot boxes/ seal numbers not being recorded.
5. I am a citizen journalist who is committed to setting the new media standards for accuracy and urgency in independent web reporting. I continue to document the wrongs perpetrated against the voters of Sarasota County and post them on YouTube, calling attention to the flawed and grievous errors generated by electronic voting devices and the corporations who own these machines. Votes are lost in cyberspace, recounts are not possible and the corporation controlling the voting system, ES&S in Florida, insists on its right to conceal the very information

which would reveal its machines for the failed systems they are – standing between We the People and our elections.

6. Were the Court to direct that the federal races in New York be hand counted in 2008, Video the Vote would assist in organizing volunteers to go up to New York to assist with the hand count and videoing, helping to provide the most secure and transparent electoral process human beings know how to do.

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

/s/ \_\_\_\_\_

**JEANNIE DEAN**

Executed on December 10, 2007