

DECLARATION OF RAUL ARROYA-MENDOZA

RAUL ARROYA-MENDOZA, being duly sworn under penalty of perjury,

declares that the following is true and correct:

1. I am a contract paralegal at Advancement Project.
2. After conducting an extensive study, Advancement Project released a report this month called: "The End of the Line? Preparing for a Surge in Voter Turnout in the November 2008 General Election." A copy of the relevant sections of the report is attached as Ex. 4 to the Declaration of Andrew G Celli ("Celli Decl." or "Celli Declaration").
3. I assisted in the preparation of the report. I reviewed public records and contacted local Pennsylvania Boards of Elections to verify the underlying data pertaining to polling place resources (primarily machine and poll workers) that was used in the report.
4. The report analyzed the allocation of voting equipment and poll workers in four Pennsylvania jurisdictions: Philadelphia, Alleghney County, Berks County, and Montgomery County.
5. Attached as Ex. 15 to the Celli Declaration is a true and correct copy of the spreadsheet used by Advancement Project when determining whether Berks County had a sufficient number of machines allocated to each precinct. The information in this spreadsheet regarding the number of machines allocated to each precinct is based upon information provided by the Berks County Board of Elections in response to public document requests. A copy of the document provided by Berks County is attached to the Celli Declaration as Ex. 22. The Berks County document (Ex. 22) lists the city or township in the leftmost column, the ward and division in the middle, and the machines allocated to that precinct on the far right. I reviewed the public documents to ensure that the information in Ex. 15 regarding machine allocation is true and correct.

6. Attached as Ex. 16 to the Celli Declaration is a true and correct copy of the spreadsheet used by Advancement Project when determining whether Montgomery County had sufficient numbers of machines allocated to each precinct. The information in this spreadsheet regarding the number of machines allocated to each precinct is based upon information provided by the Montgomery County Board of Election. I reviewed the public documents to ensure that the information in Ex. 16 regarding machine allocation is true and correct. The information in the report regarding Montgomery County does not take into account 75 new machines recently purchased by Montgomery County. A copy of the document provided by the Montgomery County Board of Election on or about October 14, 2008 showing the number of machines before and after the allocation of these 75 new machines is attached to the Celli Declaration as Ex. 18.

7. Attached as Ex. 17 to the Celli Declaration is a true and correct copy of the spreadsheet used by Advancement Project when determining whether Philadelphia had a sufficient number of machines allocated to each precinct. The information in this spreadsheet regarding the number of machines allocated to each precinct is based upon information provided by the Philadelphia Board of Elections in response to public document requests. A true and correct copy of the document provided by the Philadelphia Board of Elections is attached as Ex. 19 to the Celli Declaration. The Philadelphia Board of Elections document (Ex. 19) shows the precincts that do not have two machines and is current as of October 1, 2008. According to the Philadelphia Board of Elections, a precinct not listed on Ex. 19 has two machines allocated to it. I reviewed the public documents to ensure that the information in Ex. 17 regarding machine allocation is true and correct.

8. Attached as Ex. 21 to the Celli Declaration is a true and correct copy of the spreadsheet created by Advancement Project regarding machine allocation in Allegheny

County. The information in this spreadsheet regarding the number of machines allocated to each precinct is based upon information provided by the Allegheny County Board of Elections in response to public document requests. A true and correct copy of the document provided by the Allegheny Board of Elections is attached as Ex. 20 to the Celli Declaration. I reviewed the public documents to ensure that the information in Ex. 21 regarding machine allocation is true and correct.

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

Dated: October 22, 2008
Washington, D.C.


RAUL ARROYA-MENDOZA