

Exhibit 16

CITY OF ALBUQUERQUE)
COUNTY OF BERNALILLO)
STATE OF NEW MEXICO)

AFFIDAVIT OF JOYCE BARTLEY

I, Joyce Bartley, being first duly sworn upon oath deposes and states as follows:

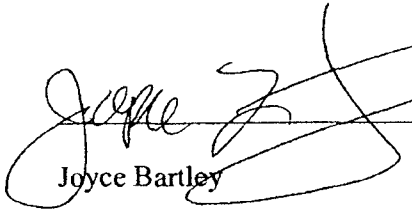
1. I am Joyce Bartley and I reside at 616 Vassar St., NE, Albuquerque, New Mexico, 87106. I have resided at this residence for approximately 8 years.
2. I am over 18 years of age and competent to make this affidavit.
3. I am a registered voter in Bernalillo County, New Mexico.
4. I make this affidavit upon personal knowledge.
5. On October 26, 2004, at approximately 12:00 p.m. I went to an early voting site on Candelaria, NW.
6. Upon confirming my registration, I was pointed in the direction of an automated touch screen voting machine (hereinafter the, "First Machine") by a poll worker. While repeatedly attempting to vote on the First Machine for Richard Romero, the touch screen indicated Heather Wilson. This occurred on more than five separate occasions before being remedied.
7. I spoke with a poll worker about the incident and he lent me a pencil to complete the rest of my electronic ballot. He indicated that the machine sometimes reads such a utensil more easily than the touch of a finger. I used the pencil to cast the rest of my votes. Upon completing my electronic ballot on the First Machine, the touch screen voting machine refused to accept my votes. Thereafter, the poll



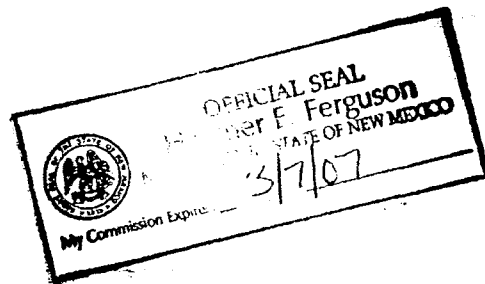
worker directed me to a second voting machine (hereinafter the, "Second Machine").

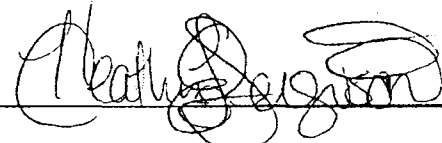
8. The Second Machine was inoperative. Thereafter, the poll worker showed me to a third voting machine (hereinafter the, "Third Machine"). The Third Machine was also inoperative.
9. I was then shown to a forth electronic voting machine (hereinafter the, "Fourth Machine"). The Fourth Machine, though it had difficulties similar to the First Machine, did appear to accept my completed ballot when I pressed the "vote" button.
10. I am confident that I could identify the machines at said precinct if requested to do so.

FURTHER AFFIANT SAYETH NAUGHT.


Joyce Bartley

Sworn to and subscribed before me this
28 day of October, 2004.




Notary Public