

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JILL STEIN and RANDALL REITZ,

Plaintiffs,

v.

PEDRO A. CORTÉS, in his official capacity as
Secretary of the Commonwealth; and JONATHAN
MARKS, in his official capacity as Commissioner
of the Bureau of Commissions, Elections, and
Legislation,

Defendants.

No. 16-CV-8287

DECLARATION OF ILANN M. MAAZEL

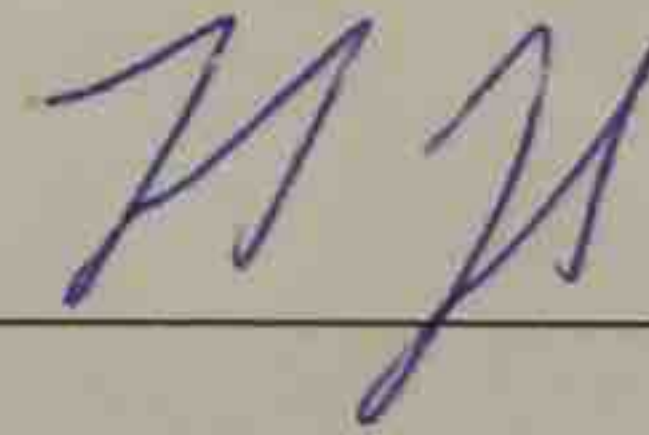
I, ILANN M. MAAZEL, hereby declare under penalty of perjury:

1. I am a partner in the firm of Emery Celli Brinckerhoff & Abady LLP, counsel for Plaintiffs in this action and counsel for Jill Stein and the Jill Stein for President Campaign (the "Campaign") in connection with 2016 election recounts in Pennsylvania, Michigan, and Wisconsin. My application for admission *pro hac vice* in this matter is forthcoming.
2. Attached to this declaration are true and correct copies of the exhibits listed on the attached chart.
3. I attended a public meeting of the Philadelphia County Board of Elections on December 1, where I represented Dr. Stein and the Campaign. Before the hearing, I requested in writing that the Board's recanvass of votes include a forensic examination of the DRE machines by a team of leading computer experts retained by the Campaign.

4. At the beginning of the hearing, the Board decided that it was not going to allow a forensic examination of the machines. The Board then invited counsel for the campaigns to speak. I urged the Board to allow a forensic examination. I argued that Dr. Stein, as a candidate, has a right to "examine" the voting machines during any recanvass, *see* 25 P.S. § 2650(c), and that any recanvass would not be meaningful without ensuring that the machines are functioning properly. Counsel for the electors of Donald J. Trump and the Republican Party opposed this request. The Board refused to allow a forensic examination and offered no explanation for its decision.

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

Dated: December 5, 2016



ILANN M. MAAZEL

EXHIBITS TO THE DECLARATION OF ILANN M. MAAZEL*Jill Stein and Randall Reitz v. Pedro A. Cortés*, No. 16-CV-8287

Ex. No.	Description
1	Affidavit and Declaration of Aquene Freechild, dated December 5, 2016
2	Affidavit and Declaration of Randall Reitz, dated December 3, 2016 (Montgomery County Voter)
3	Affidavit and Declaration of Michelle Zuckerman-Parker, dated December 4, 2016 (Allegheny County Voter)
4	Affidavit and Declaration of Richard P. Alquist, Jr., dated December 4, 2016 (Berks County Voter)
5	Affidavit and Declaration of Lindsay Forness, dated December 4, 2016 (Bucks County Voter)
6	Affidavit and Declaration of Robert Woodruff, dated December 4, 2016 (Bucks County Voter)
7	Affidavit and Declaration of Carolyn M. Smith, dated December 4, 2016 (Butler County Voter)
8	Affidavit and Declaration of Joanne Tosti-Vasey, dated December 4, 2016 (Center County Voter)
9	Affidavit and Declaration of Mary Vollero, dated December 3, 2016 (Center County Voter)
10	Affidavit and Declaration of Mary Ellen Balchunis, dated December 5, 2016 (Delaware County Voter)
11	Affidavit and Declaration of Rebecca Luzi, dated December 4, 2016 (Delaware County Voter)
12	Affidavit and Declaration of Emily Nelson, dated December 4, 2016 (Delaware County Voter)
13	Affidavit and Declaration of Timothy John Runkle, dated December 4, 2016 (Lancaster County Voter)
14	Affidavit and Declaration of Tony Lee Ballen Ayash, dated December 4, 2016 (Montgomery County Voter)
15	Affidavit and Declaration of Cynthia C. Bagola, dated December 4, 2016
16	Affidavit and Declaration of Anna M. Durbin, dated December 4, 2016 (Montgomery County Voter)
17	Affidavit and Declaration of Courtney R. Howe, dated December 4, 2016 (Montgomery County Voter)
18	Affidavit and Declaration of James A. Howe, dated December 4, 2016 (Montgomery County Voter)

19	Affidavit and Declaration of Robert T. Howe, dated December 4, 2016 (Montgomery County Voter)
20	Affidavit and Declaration of Shannon K. Knight, dated December 4, 2016 (Montgomery County Voter)
21	Affidavit and Declaration of Kimberly Kupka, dated December 4, 2016 (Montgomery County Voter)
22	Affidavit and Declaration of Douglas T. Ross, dated December 4, 2016
23	Affidavit and Declaration of Elizabeth Walters, dated December 5, 2016 (Montgomery County Voter)
24	Affidavit and Declaration of Beverly A. Designor, dated December 4, 2016 (Northampton County Voter)
25	Affidavit and Declaration of Angela R. Trilli-Braun, dated December 5, 2016 (Northampton County Voter)
26	Affidavit and Declaration of Grace Palladino, dated December 4, 2016 (Philadelphia County Voter)
27	Affidavit and Declaration of Katherine Rubin, dated December 4, 2016 (Philadelphia County Voter)
28	Affidavit and Declaration of Carol Cutler, dated December 3, 2016 (Westmoreland County Voter)
29	Affidavit and Declaration of Rita Drapkin, dated December 5, 2016 (Westmoreland County Voter)
30	Affidavit and Declaration of Rachel Preibisch, dated December 5, 2016 (York County Voter)
31	Transcript of <i>Gaddy, et al. v. Montgomery County Board of Elections</i> Proceeding on November 30, 2016
32-A	Email from Johnathan Marks enclosing list of Pennsylvania counties, dated November 28, 2016
32-B	Email from Johnathan Marks enclosing updated list of Pennsylvania counties, dated November 28, 2016
32-C	Email from Jonathan Marks enclosing correspondence regarding recount, dated November 29, 2016
32-D	Email from Johnathan Marks enclosing updated list of Pennsylvania counties, dated December 1, 2016
33	Ilann Maazel Email to Jonathan Marks, dated December 2, 2016
34	Pennsylvania Department of State Memo, dated November 28, 2016
35	Order, <i>In re: Recount and/or Recanvass of the Vote for President of the United States and for United States Senate in the November 8, 2016 General Election</i> , No. G.D.

	16022954, dated December 2, 2016
36	Letter to County Board of Elections, dated November 30, 2016
37	Petition <i>In re: The Matter of the 2016 Presidential Election</i> , Commonwealth Court of Pennsylvania, Harrisburg, dated November 28, 2016
38	Petitioner's Request for Brief Continuance, <i>In re: The Matter of the 2016 Presidential Election</i> , dated December 1, 2016
39	Order, <i>In re: Matter of the 2016 Presidential Election</i> , No. 659 M.D. 2016
40	Praceipe to Discontinue and Withdraw, <i>In re: Matter of the 2016 Presidential Election</i> , No. 659 M.D. 2016
41	Summary of voting machines used in Pennsylvania
42	Order, <i>Gaddy, et al., v. Montgomery County Board of Elections</i> , No. 2016-28344
43	Audit Request to Allegheny County Elections Division, dated December 4, 2016
44	Allegheny County Response to Audit Request, dated December 5, 2016
45	Opinion & Order, <i>Jill Stein v. Thomas</i> , No. 16-14233, (E.D. Mich., Dec. 5, 2016)
46	Montgomery County 2016 Unofficial Election Results

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