

U.S. DISTRICT COURT  
N.D. OF N.Y.  
FILED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

DEC 28 2007

ROBERT L. SCHULZ, et al., )  
 )  
 Plaintiffs, )  
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 )  
 STATE OF NEW YORK, et al., )  
 )  
 )  
 Defendants, )

LAWRENCE K. BAERMAN, CLERK  
ALBANY

No. 07-cv-0943  
LEK-DRH

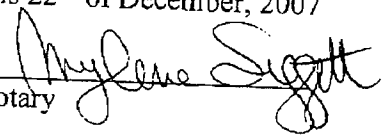
**AFFIDAVIT BY JOHN LIGGETT  
IN SUPPORT OF PLAINTIFFS**

John Liggett, being duly sworn, deposes and says:

1. I am a Plaintiff in the matter captioned above, I am over 18 years of age, I reside at 1040 First Avenue, New York, NY 10022, and I make this affidavit in support of Plaintiffs:
2. On Thursday December 20, 2007, at 11'o clock AM I traveled to Brooklyn, New York, to determine if any of the following entities were located at or nearby 45 Main Street: National Election Pool, Associated Press or Voter News Service.
3. Outside of 45 Main Street there was a gentleman sitting in a truck that had "AP" written on it. I asked him if he knew where the office was located. He asked me what I was looking for? I explained that I understood that Associated Press has a location where all the election information from all the states goes. He told me that "yes, this was correct and that the office was located at 55 Washington Street on the 4<sup>th</sup> floor." I asked him again, "Is this where all the election information comes from?" He again said, "Yes, this is where all election returns from all 50 states are communicated to the office on Washington Street and then distributed to all the networks."
4. I then got back into my car and drove over to 55 Washington Street. I went up to the 4<sup>th</sup> floor. I was able to see that for room 451 & 453 there was a sign on the door that said "Associated Press - Election Operations". In these two rooms were approximately 150 computers that about four workers were setting up. I saw the same gentleman that I'd spoken with in the Associated Press truck. He was there in this room, setting up computers.

- 5. I videotaped what I saw during my visit. The video verifies that Associated Press Election Operation is a large centralized computer operation located at 55 Washington Street, Brooklyn, New York. According to AP staff that I spoke to, this location is where the election information from all 50 states is received from agents of the Associated Press. According to AP staff, AP consolidates and analyzes the voter returns and exit polling data, and communicates the results to the major networks, for broadcast.
- 6. I do swear that the forgoing is true to the best of my knowledge, information, and belief.

  
 JOHN LIGGETT  
 1040 First Ave.  
 New York, NY 10022  
 Telephone: 646-335-6088

Swore to before me  
 this 22<sup>nd</sup> of December, 2007  
  
 Notary

**MYLENE LIGGETT**  
 Notary Public, State of New York  
 No.01LI6065349  
 Qualified in New York County  
 Commission Expires October 15, 2009