AFFIDAVIT

STATE OF NEW YORK)
) ss.
COUNTY OF ROCKLAND)

The undersigned Steven S. Klein with a current residence of 73 Regina Road, Airmont, New York being duly sworn deposes and says:

I make this affidavit in connection with the action in New York State Supreme Court commenced by Michael Parietti, Robert Romanowski and Deborah Seidman relating to allegations of certain improper activities during the course of the ward referendum vote held on Tuesday, September 30, 2014 in the Town of Ramapo.

The following is a summary of my personal experience regarding the referendum vote as follows, which I ask the court to take into consideration in rendering any decisions in this legal action:

- 1. On Tuesday, September 30th, 2014, I, Steven S. Klein, was an election inspector at the Chestnut Ridge Village Hall polling site Chestnut Ridge, N.Y.
- 2. I attended the very first training session at Ramapo Town Hall at 11:00 a.m. on Monday Sept. 22 2014, for which I signed in. The training session was led by Chris Sampson, Town of Ramapo Clerk. We were advised that the protocol for the referendum would be like the other elections we had presided over in our capacities as election inspectors and machine inspectors. At no point in this training session were we told that unregistered voters would be permitted to vote.
- 3. When the Rockland County Board of Elections (RCBOE) runs these training sessions they are concerned with two major aspects of the election: protocols and responsibilities. Any and all questions regarding the election- candidates, political parties, what a proposition may mean- are not discussed so as not to appear to sway the inspectors one way or the other.
- 4. This training session differed from the RCBOE in that Mr. Sampson answered questions regarding what a "yes" or "no" vote would/could mean; for example Mr. Sampson answered the question, "What is a referendum?" as well as questions regarding hypotheticals regarding who could possibly be involved in the geographical dividing of the Town of Ramapo into wards.
- 5. The morning of the election Mr. Sampson was present for about 15 minutes at the Chestnut Ridge Village Hall between 05:30 a.m. and 06:00 a.m. Mr. Sampson mentioned NOTHING of any changes to the usual method of voting. When we arrived we learned that election districts 3 and 67 had been combined. There were the usual two (2) machine inspectors. There were only three (3) election inspectors one (1) for registered voters last name A-G, one (1) for registered voters last name H-N and one (1) for registered voters last name O-Z. Things were progressing normally for this polling place and at



approximately 10:55 a.m. a female employee from the Village of Chestnut Ridge came into our polling place with that days edition of the Journal News and showed us the paragraph on the continuation page that said that unregistered voters who could prove residency in the Town of Ramapo would be allowed to vote with affidavit ballots This was not immediately confirmed by anyone in our polling place and was news to all of us as Mr. Sampson himself had been at our location and did not mention this to anyone. At some point, it was confirmed that we had to issue affidavit ballots to unregistered voters.

- 6. We began to have people come to the location stating, "We/I heard that we/I could vote even if we/I are/am not legally registered to vote." Our polling place did have affidavit ballot envelopes but they were clearly much different than the RCBOE affidavits that I had previously worked with. In each and every election I have participated in as an election inspector I have been the person charged with processing the affidavit ballots at my polling site. By the late afternoon we were experiencing a turnout that would have been manageable had there been more than one (1) person for each book for the combined districts. Consequently, as the result of the understaffing at this polling site there were no breaks for any of us after 15:00 hours. One election inspector is an octogenarian and the other inspector was over 70 years old. None of us moved from the desk more than three times and only to go to the bathroom.
- 7. We issued ballots for affidavit voting for people who presented I.D.'s with three (3) different addresses, passports only and no other I.D. and other types of identification (parochial school with no other proof of residency) that I considered substandard. I have worked each and every primary and general election since the implementation of the paper ballots. As I previously stated I was the person charged with processing affidavit ballots at my polling site in all of these elections including Hurricane Sandy. Because we were so understaffed at my polling location, more than half of the affidavit ballots were not properly documented on the challenge report. Furthermore we had additional ballots delivered to our polling place not once but twice.
- 8. I was so appalled by the irregularities at my polling location and the general lack of what I considered to be a lawful election that, within days of the election, I called the RCBOE and spoke to a Commissioner and reported the events in specific detail.

I understand that the court will be relying on the accuracy of this affidavit in any judgments and decisions made in connection with the above legal action.

Sworn to before me this day of September, 2015

Sign Name:

Print Name: Steven S. Klein

Notary Public

WILLIAM J. WEBER
Notary Public - State of New York
No. 01WE6298373
Qualified in Rockland County
My Commission Expires March 10, 2018