

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

SHELBI HINDEL, *et al.*,

*

Plaintiffs,

*

v.

*

Civil Action No. **2:15-cv-3061**

JON A. HUSTED,

*

Defendant.

*

* * * * *

DECLARATION OF ALEEHA DUDLEY

I, Aleeha Dudley, declare as follows:

1. I am over 18 years of age and am competent to make this declaration.
2. I am blind and a member of the National Federation of the Blind.
3. My full-time residence is in Columbus, Ohio, but I am currently studying out of state. I expect to return to Columbus in late spring or early summer of 2016. I will be moving back into the apartment that I currently rent in Columbus.
4. I am registered to vote in Ohio.
5. I access text on my computer by using VoiceOver, a type of screen access software that is built into Apple devices. VoiceOver reads aloud the text that appears on my computer screen. I regularly use VoiceOver to read and complete electronic forms on my computer. I am also comfortable using other types of screen access software on PC devices.
6. I cannot fill out a paper absentee ballot privately and independently. Because I am blind, I require sighted assistance to read printed text and to mark my selections on a paper ballot.

7. During this past November 2015 election, I was out of state. Therefore, my only option for voting was to vote absentee. Because I am not comfortable sharing how I vote with someone else, I decided not to vote at all rather than find someone to enter my votes for me on the paper absentee ballot.

8. I would very much like to vote in the March 15, 2016 presidential primary election, but I will still be out of state on that day. If I am not able to independently review and mark an absentee ballot by then, I will once refrain from voting. If I cannot have a secret ballot, I do not want to vote at all. Therefore, it is very important to me to have the option of voting absentee privately and independently in the March 2016 primary.

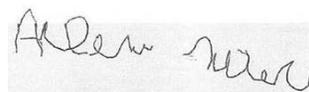
9. Even once I move back to Columbus, I will still want the option of voting absentee privately and independently. I have found the staff at polling places to be poorly trained in operating the voting machines for nonvisual access. I would rather vote absentee than have to wait as a poll worker struggles to operate the voting machine.

10. I would be able to vote absentee privately and independently if I could fill out my absentee ballot on my computer, using my screen access software to read me the text of the ballot and my keyboard to make my selections.

11. I have tried to access the Secretary of State's voter services website in the past to change the address on my voter registration. I found the site to be extremely inaccessible. I want the site to be corrected in time for the March 2016 primary in case I need to access it for information or for forms.

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

Executed on: December 4, 2015

A handwritten signature in black ink, appearing to read "Aleeha Dudley", is written over a light gray rectangular background.

Aleeha Dudley