

**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 MARK RICCOBONO

I, Mark Riccobono, declare as follows:

1. I am over 18 years of age and am competent to make this declaration.
2. My business address is 200 E. Wells Street at Jernigan Place, Baltimore, Maryland 21230.
3. I am the President of the National Federation of the Blind (“NFB”), a position I have held since July 2014. Prior to becoming President, I served for many years as Director of Education and then as Executive Director of the Jernigan Institute, the research and training arm of the NFB.
4. The NFB is the oldest and largest national organization of blind persons. It is a 501(c)(3) non-profit corporation duly organized under the laws of the District of Columbia and headquartered in Baltimore, Maryland and it has affiliates in all 50 states, Washington, D.C., and Puerto Rico. The NFB and its affiliates are widely recognized by the public, Congress, executive agencies of state and federal governments, and the courts as a collective and representative voice on behalf of blind Americans and their families. The organization promotes the general welfare

of the blind by assisting the blind in their efforts to integrate themselves into society on terms of equality and by removing barriers that result in the denial of opportunity to blind persons in virtually every sphere of life, including education, employment, family and community life, transportation, and recreation.

5. The ultimate purpose of the NFB is the complete integration of the blind into society on a basis of equality. This objective includes the removal of legal, economic, and social discrimination. As part of its mission and to achieve these goals, the NFB has worked actively to ensure that the blind have an equal opportunity to cast their votes privately and independently by collaborating with developers of voting technology to ensure accessibility for the blind. In particular, the NFB has devoted extensive resources – resources that have been diverted from other important projects – to helping develop absentee voting technology that is accessible to the blind. Furthermore, the NFB has expended resources working with organizations, businesses, and governmental entities around the country to help make their websites accessible to blind individuals.

6. Throughout 2013 to 2014, NFB staff members Anne Taylor, former Director of Access Technology, and Lou Ann Blake, Director of Outreach at the NFB worked with Maryland's State Board of Elections ("the Board") to test and improve the accessibility of its newly developed online ballot marking tool, which is used to read and mark absentee ballots on a computer or tablet. Thanks to the hard work of Ms. Taylor, Ms. Blake, and the Board's staff, the current version of the online ballot marker tool is fully accessible with screen access software.

7. The NFB learned from the Board that more than 1,700 voters with disabilities used the ballot marking tool in the November 2014 election in Maryland. Many NFB members, including my wife and me, were among those who used the tool successfully in that election. With the aid

of the ballot marking tool, I was able to read and mark my absentee ballot on my computer using screen access software. When I finished marking my ballot, I printed and signed the ballot and then mailed it to my local board of elections. With the use of the ballot marking tool, many Maryland NFB members like my wife and me were able to vote privately and independently by absentee ballot for the first time.

8. The NFB is a membership organization and has many blind members who are registered to vote in Ohio, desire to exercise their right to vote through the use of an absentee ballot, and wish to access the important information and forms available on the Secretary of State's voter services website.

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

Executed on: December 7, 2015



Mark Riccobono