

**Declaration of Clifford Arnebeck**

1. I attended a meeting on August 15, 2008, called by the Ohio Attorney General and the Ohio Secretary of State with counsel for the various political campaigns, as well as attorneys who might be called upon to represent clients in litigation related to the November 2008 election. At this meeting I asked what procedure would be followed for investigating reports of fraudulent activity aimed at the 2008 election. In response, Secretary of State Jennifer Brunner stated that reports of such activity should be made directly to her.
2. I am in the process of making such a report to her, which includes evidence that persons who engaged in a fraudulent conduct in the 2000 and/or 2004 presidential elections are currently involved in positions of trust with respect to the 2008 Ohio presidential election. This includes a small number of election officials whose responses to the Secretary of State's directive to account for missing 2004 ballots indicated that ballots had been destroyed in violation of law and court order to cover up fraudulent activity.
3. In regard to an Email from Ms. Chelsie Rice of the Ohio AG's office that was attached to Ms. Shaffer's affidavit, stating that I had indicated to her that I represented Ms. Shaffer, I contacted Ms. Rice, after being directed to do so by Brian Laliberte, head of the criminal division. Ms. Rice advised me that their office had declined to pursue Ms. Shaffer's complaints. I asked why. I did not say that I represented Ms. Shaffer. However, the fact that I was aware of Ms. Shaffer's activity, because she had told me about it, and I asked the reason for their office discontinuing discussions with Ms. Shaffer, may have been interpreted by Ms. Rice as indicative of a relationship between me and Ms. Shaffer.
4. I paid Ms. Lupo \$2000 for her work as a paralegal on the amended complaint in the King Lincoln case. The check cleared on October 30, 2006, with Ms. Lupo's endorsement on the back.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 8, 2008.

*/s/ Clifford Arnebeck*

—

---

Clifford Arnebeck