EXHIBIT 1
AFFIDAVIT OF JAMES CARABELLI

STATE OF MICHIGAN

COUNTY OF MACOMB

James Carabelli, being first duly sworn, states as follows:

1. I have personal knowledge of the facts stated herein and, if called as a witness, am competent to testify thereto.

2. I am a resident of Macomb County and am serving my second term as Chairman of the Macomb County Republican Party, a position I have held since January 2005.

3. As Chairman of the Macomb County Republican Party, I do not have authority to speak on behalf of any other Republican Party Committee, including the Michigan Republican Party or the National Republican Party.

4. On September 9, 2008, I received a call on my cell phone from a woman who identified herself as Eartha Melzer, a reporter working on a story about issues important to Macomb County voters and the upcoming presidential election.

5. Ms. Melzer and I spoke for approximately 4 minutes.

6. During this brief conversation, Ms. Melzer asked me to describe the most important issues currently facing Macomb County and its voters. I responded that the high rate of home foreclosures and unemployment were the most significant issues.

7. Later in that same conversation, Ms. Melzer asked me about polling place challenges that are available under Michigan law. I stated that poll challenging is done to ensure State electoral procedures are followed and that I was not in a position to address specific challenges that might be raised.
8. The reason why I could not address specific types of challenges is because at the county level we do not engage in any poll challenging. All of the poll challenge coordination is done at the state level, so I do not know what the procedures are for this next election.

9. On September 10, 2008, I read the story published by the Center for Independent Media, written by Melzer. The blog contained completely inaccurate quotes and statements. Specifically, I never stated that “[w]e will have a list of foreclosed homes and will make sure people are not voting from those addresses.” I never made any statement even remotely similar to that statement and it is completely false.

10. Until I read this article, I had never even heard of the possibility of a challenge being made based on notices of foreclosures, or anything similar.

11. I do not have, nor have I ever sought to acquire, a list of homes identifying which homeowners have received a notice of foreclosure. I am unaware of any effort on the part of any Republican Party Committee at any level to do so.

12. I have never had any person affiliated with the Republican Party, or others, suggest that notices of foreclosures would or should be used by challengers at the November or any other election.

13. In fact, following the publication of this false article, I have been told that it is definitely not, nor ever has been, the plan or strategy of the Republican Party, at any level, to use foreclosure lists to challenge voter eligibility.

14. Further Affiant sayeth not.

[Signature]

James Carabelli
Subscribed and sworn to before me in Macomb County, Michigan, this 7th day of October, 2008

Print name: Terri Kowal
Notary Public, State of Michigan, County of Macomb.
My commission expires 11/20/13.
Acting in the County of Macomb.

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