Diane Cordry Golden, for her declaration, pursuant to 28 U.S.C. § 1746, says:

1. I make this declaration based upon my personal knowledge and belief.

2. I have a BS in Speech Pathology, MS in Audiology and a Ph.D. in Special Education.

3. I am the Director of Missouri Assistive Technology, the designated Assistive Technology Program for the state of Missouri under the federal The Assistive Technology Act (P.L. 108-364). The Act supports programs of grants to states to address the assistive technology needs of individuals with disabilities.

4. I am also on the board of directors for the Association of Assistive Technology Act Programs (ATAP), the national membership organization of the Assistive Technology Programs.

5. Assistive technology is technology used by individuals with disabilities in order to perform functions that might otherwise be difficult or impossible. Assistive technology can include mobility devices such as walkers and wheelchairs, as well as hardware, software, and peripherals that assist people with disabilities in accessing computers or other information technologies.

6. I have been working in the field of assistive technology and accessible information technology for over 15 years and have been providing services to individuals with disabilities for almost 30 years. I served on the U.S. Access Board Advisory Committee for development of the Section 508 technical standards for information technology accessibility and
am currently providing technical assistance to a variety of public and privately funded projects related to accessible voting equipment.

7. Lever voting machines are not an accessible voting system. They do not provide features that allow voters with disabilities to vote privately and independently. For example, lever systems do not provide an audio-tactile ballot interface to make the system usable by individuals who are blind, do not provide a large print visual display for individuals with vision loss who are not blind, and do not provide tactile or switch input options that would enable voters with dexterity limitations to vote independently.


9. The VVS and the VVSG provide a set of specifications and requirements against which voting systems can be tested to determine if the systems provide all of the basic functionality, accessibility and security capabilities required of these systems. In addition, the guidelines establish evaluation criteria for the national certification of voting systems.

10. In order for any machine to be considered accessible it would, at a minimum, need to meet one of the nationally accepted set of standards for voting equipment accessibility. The only types of voting systems that currently meet these accessibility standards are direct recording electronic voting systems and ballot marking devices.

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

By: Diane Cordry Golden, Declarant

Date: 3/3/06