

Exhibit 1

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

ORIGINAL

JILL STEIN, ALABAMA GREEN PARTY,
MATTHEW HELLINGER, ROBERT COLLINS,
CONSTITUTION PARTY OF ALABAMA, JOSHUA
CASSITY, STEVEN KNEUSSLE, LIBERTARIAN
PARTY OF ALABAMA, MARK BODENHAUSEN, and
VICKI KIRKLAND,
Plaintiffs,

vs. Case Number 2:12-cv-00042-WKW-CSC

BETH CHAPMAN, Alabama Secretary of
State,
Defendant.

* * * * *

DEPOSITION OF JILL STEIN, M.D.,
taken pursuant to notice and
stipulation on behalf of the Defendant,
with the deponent and plaintiffs'
attorney attending by Skype and
defendant's counsel and court reporter
appearing at 501 Washington Avenue,
Montgomery, Alabama, before Bridgette
Mitchell, Shorthand Reporter and Notary
Public in and for the State of Alabama
at Large, on December 4, 2012,
commencing at 9:10 a.m.

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1 the ground for the purpose of acquiring
2 ballot status as the Green Party. We
3 always worked to achieve ballot status
4 as a party whenever we had that option.
5 It provides many benefits to the
6 candidate and to the party.

7 One reason is that if you achieve a
8 ballot line for the party, you've
9 essentially created a ballot line for
10 your candidates at all levels of office
11 in that state. So it's an extremely
12 valuable item, much more valuable than
13 just getting on as an independent
14 candidate. It allows you to build a
15 party at the state level, which is the
16 real purpose of my campaign. And in
17 the Green Party, you know, we're always
18 hoping that we're going to win, but a
19 win is by building the party and
20 increasing our capacity to achieve a
21 win some day and also to impact issues
22 that we run on as Greens.

23 MR. WHITNEY: Y'all, let me

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1 party. Our only goal was not winning
2 the office. We were also running that
3 race to build the party. That was an
4 objective that we knew we could
5 achieve. We didn't consider winning
6 the presidency a likely outcome, but we
7 considered building the parties at the
8 state level and the local level was
9 absolutely achievable. And, you know,
10 that was a major consideration in
11 undertaking this run. That's summarily
12 what the campaign was all about.

13 Q. Now, in Alabama, if you had appeared on
14 the ballot as the Green Party candidate
15 by the way our laws work, as they're
16 currently written, you would -- in
17 securing that spot for you, you would
18 have also secured a spot for other
19 Green Party candidates down ballot.
20 Somebody could have run for public
21 service commission, for state supreme
22 court, for county commissions or
23 circuit clerks or whatever else was on

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1 Q. Great. Do you know how many votes you
2 received nationally?

3 A. Over 450,000.

4 Q. Was it less than 500,000?

5 A. Yes, but not a whole lot less in the
6 scheme of things. If you were rounding
7 off to whole numbers, you would round
8 off to about 500,000.

9 Q. Okay. I just don't want it to be
10 unclear later that 20 million is above
11 450,000. Did you come to Alabama at
12 all as part of your campaign?

13 A. I did not.

14 Q. Did your vice presidential candidate
15 come to Alabama?

16 A. I don't believe so. As I mentioned
17 earlier, we especially focused on
18 states where we had ballot access and
19 things going on with which we could
20 build the party.

21 Q. So because you were going to be on the
22 ballot here as an independent, Alabama
23 wasn't a priority for you to visit?

1 A. You know, I -- there were many reasons
2 that decided where we went, not only
3 the ballot access, but it was among the
4 considerations.

5 Q. Okay.

6 A. And, again, I would defer to Ben Manski
7 to tell you about the decisions that
8 went into my itinerary.

9 Q. Okay. Do you know if you did any
10 campaigning in Alabama in any form?
11 Because we were just talking about you
12 visiting. But was there other
13 campaigning in Alabama?

14 A. As a candidate, I was mostly focused on
15 where I needed to be and, you know,
16 articulating our message, especially in
17 the context of the news cycle. So my
18 sights were pretty well focused on the
19 things that I had to be doing. I
20 wouldn't be a good person to tell you
21 about the other dimensions of the
22 campaign.

23 Q. Okay. If you wanted to place a

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1 billboard in Alabama, to run a
2 commercial in Alabama, to send a
3 mailer, a mail piece to supporters or
4 potential supporters in Alabama, would
5 you have been able to do that in a way
6 that showed that you were the Green
7 Party candidate?

8 A. You know, in theory, we can do that
9 anywhere, whether on the ballot or not.
10 But as a campaign with minimal
11 resources on a shoestring budget, we
12 have to target our resources to the
13 most effective party-building
14 strategies that we have. So, you know,
15 we didn't have a lot of money to put
16 into areas where we did not have the
17 framework for party-building, and not
18 being on the ballot as a Green Party
19 candidate was a big harm.

20 Q. Okay. I'm sorry. What did you say
21 after "harm"?

22 A. To the campaign.

23 Q. And I understand you had limited

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1 win. Our goal was not only to win.
2 Our equivalent goal, or I say a goal of
3 at least as high a priority, was to
4 grow the party; and growing the party
5 has everything to do with having the
6 ballot-access battle. And in order to
7 fight them, you know, they need to be
8 in a time frame that we can fight and
9 they need to have a reasonable
10 threshold for signatures that can be
11 humanly met without being, you know, a
12 multi, multimillion-dollar campaign.

13 Q. Let me ask you a hypothetical question.
14 If this year in Alabama the deadline
15 had been September 6th whether you were
16 going to be an independent candidate or
17 a party candidate but to be an
18 independent candidate you needed 5,000
19 signatures and to be a party candidate
20 you needed 45,000 signatures, how would
21 you have proceeded?

22 MR. WHITNEY: For the record,
23 I'm objecting. This is obviously