

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

MIDDLESEX SUPERIOR  
COURT  
CIVIL ACTION NO.

\_\_\_\_\_ )  
 JILL STEIN and BARBARA JOHNSON )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 THE BOSTON GLOBE, WBZ-TV, )  
 WCVB-TV, WGBH-TV, WHDH-TV, )  
 and NEW ENGLAND CABLE NEWS, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

AFFIDAVIT OF JILL E. STEIN

I, Jill E. Stein, state under the pains and penalties of perjury this 30<sup>th</sup> day of September, 2002, that the factual statements made below are true upon my direct knowledge or upon my best information and belief.

1. I am the Massachusetts Green Party Candidate for Governor of the Commonwealth of Massachusetts. My name and party affiliation will appear on the statewide ballot for governor.
2. In or around the middle of September 2002, I learned from my campaign staff that I had been invited to participate in the October 1, 2002 gubernatorial debate that was being hosted by Worcester Polytechnic Institute (“WPI”). WPI’s Internet Web site about the debate confirmed that I would participate in the October 1<sup>st</sup> debate.

3. After learning that I would be allowed to participate in the October 1<sup>st</sup> debate, I and my campaign notified my supporters by email, telephone and otherwise that we would be participating in the debate. One of our goals in doing this was to let our supporters know that we would be able to get our political message and ideas out widely to voters and, thus, that my campaign was a credible vehicle for advancing the views of our constituents. I believe that this credibility among supporters and the public more generally was undermined by the defendant Consortium media members' sudden exclusion of me from the debate last week. In fact, the defendants' action has substantially harmed my campaign because the exclusion implies that only the two major parties' candidates are credible and worthy of consideration by voters, and that voters who are only leaning toward one of the major party candidates should not continue to evaluate their options. This political message is particularly troubling coming from a media consortium with near media monopoly control over the most critical media markets in the Commonwealth, which consortium is acting as corporate debate sponsors creating the news rather than as objective news organizations covering it.

4. I believe that the only way to restore the injury to my credibility as a candidate in the gubernatorial race, and to prevent further such injury, and to reach voters on an equal basis with the two major parties that will be participating in the debate, is by my being allowed to participate in the October 1<sup>st</sup> debate. I am prepared to do so.

---

Signature