

<b>Fixed Variables</b>	
No of ADs	24
Salary Addition for Taxes, Etc.	10%
Petition Signatures Needed/AD	1,500
Total Signatures Needed	36,000
Petition Signatures/Hour	5
Petition Signatures/Shift	20
Days for Petitioning	25
Average Votes Needed/AD	1,218
Average IDs Needed/AD	1,827
Total IDs Needed	43,848
IDs/Hour	4
IDs/Shift	14
Days to Get IDs	36

<b>Professionals &amp; Consultants</b>	<b>Cost/month</b>	<b>Months</b>	<b>Cost</b>	<b>Subtotals</b>
Lawyers for petition challenges			200,000 \$	
<b>Professionals subtotal</b>				<b>200,000 \$</b>

<b>Core Staff</b>	<b>No. of employees</b>	<b>Wage/month</b>	<b>Months</b>	<b>Taxes</b>	<b>Cost</b>	
Delegate Finder	1	4,000 \$	3	10%	13,200 \$	
Field Director	1	4,000 \$	5	10%	22,000 \$	
Asst Field Director	2	3,000 \$	4	10%	26,400 \$	
Fundraising Director	1	5,000 \$	9	10%	49,500 \$	
Fundraisers	4	3,500 \$	6	10%	92,400 \$	
Campaign Manager	1	5,000 \$	7	10%	38,500 \$	
P/T Database coordinator	1	1,500 \$	4		6,000 \$	
Admin Director	1	3,000 \$	4	10%	13,200 \$	
<b>Core Staff Subtotal</b>						<b>261,200 \$</b>

<b>Overhead</b>	<b>Cost/month</b>	<b>Months</b>	<b>Cost</b>	
Rent	3,000 \$	6	18,000 \$	
Supplies	200 \$	6	1,200 \$	
Electric	600 \$	6	3,600 \$	
Phones	500 \$	6	3,000 \$	
Cellphones	500 \$	5	2,500 \$	
<b>Overhead Subtotal</b>				<b>28,300 \$</b>

<b>Petition Operation Staff</b>	<b>No. of emp.</b>	<b>Shift wage</b>	<b>Days worked</b>	<b>Taxes</b>	<b>Cost</b>	
Field Managers	12	96 \$	25	10%	31,680 \$	
Petitioners	60	60 \$	25	10%	99,000 \$	
15 passenger van rental/week	6	1,215 \$	4		29,160 \$	
<b>Petition Operation Subtotal</b>						<b>159,840 \$</b>
10% additional for recruitment costs and costs of employees that don't work out						<b>15,984 \$</b>

<b>Campaign Field Staff</b>	<b>No. of employees</b>	<b>Shift wage</b>	<b>Days worked</b>	<b>Taxes</b>	<b>Cost</b>	
Field Managers	15	96 \$	36	10%	57,024 \$	
Door-to-door	75	60 \$	36	10%	178,200 \$	
Data Entry		10 \$			11,520 \$	
15 passenger van rental/week	8	1,215 \$	6		54,675 \$	
<b>Campaign Field Subtotal</b>						<b>301,419 \$</b>

<b>Mailings &amp; Printed Materials</b>	<b>Amount</b>	<b>Per piece/address</b>	<b>Postage</b>	<b>Frequency</b>	<b>ADs</b>	<b>Cost</b>
Petitions		300 \$			24	7,200 \$
Voter file				1	24	3,756 \$
Street Piece for Petitioning	118,000	0.14 \$		1	24	16,520 \$
Street piece for Campaign	200,000	0.12 \$		1	24	24,000 \$
Mailings	77,952	0.44 \$	0.18 \$	4	24	193,321 \$
GOTV piece	200,000	0.06 \$		1	24	12,000 \$
<b>Mailing Subtotal</b>						<b>256,797 \$</b>

<b>Primary Day/GOTV Operation</b>						
<b>Phone Banking</b>	<b>Calls to Ids</b>	<b>Completion Rate</b>	<b>Cost per completed call</b>			<b>Cost</b>
Volunteer Operation	14,031	70%	- \$			- \$
Paid Operation	14,031	70%	0.65 \$			6,384 \$
<b>Canvassing</b>	<b>No. of employees</b>	<b>Wage</b>	<b>Time Worked</b>	<b>Taxes</b>		
GOTV Coordinator's	5	750/wk	2 wks	10%		7,500 \$
Sat.-Mon.Door-to-Door	195	10 \$	15	10%		32,175 \$
Primary Day Door-to-Door	585	10 \$	5	10%		32,175 \$
<b>Transportation</b>	<b>Vans</b>	<b>Cost</b>	<b>Time Rented</b>			
GOTV	7	1,215 \$	1 wk			8,505 \$
Primary Day Only	13	50 \$	6			3,900 \$

<b>Visibility</b>						
<b>Palmcarding</b>	<b>No. of Employees</b>	<b>Wage</b>	<b>Time Worked</b>	<b>Taxes</b>		
Volunteer Operation	192	- \$	9	0%		- \$
Paid Operation	192	10 \$	9	10%		19,008 \$
Transportation (in kind)	-	- \$				- \$

<b>Legal Monitoring</b>	<b>No. of Employees</b>	<b>Wage</b>	<b>Time Worked</b>	<b>Taxes</b>		
Attorneys (Volunteers)	24	- \$	9	0%		- \$
Transportation (in kind)	-	- \$		0%		- \$

<b>Primary GOTV Subtotal</b>						<b>109,647 \$</b>
<b>TOTAL COST</b>						<b>1,333,187 \$</b>

**Summary of Assumptions****Fixed Variables**

No. of ADs There are 24 ADs within the Second Judicial District covering Staten Island and Brooklyn.  
 Salary Addition for Taxes 10% represents the standard composite of FICA, Unemployment Insurance, Workers Compensation, and other costs for employees.

Petition Signatures Needed/AD Triple the legal amount for Democratic judicial delegate candidates in any Judicial District in New York State. This is the general rule of thumb among political operatives. In the case of a challenger running against the county party leaders' candidates, this is a conservative estimate of how many signatures would be needed to resist legal challenges.

Total Signatures Needed This is 24 ADs x 1,500 signatures per AD.

Petition Signatures/Hour 5 is a standard estimate for petitioning among political campaign operatives.

Petition Signatures/Shift Conservatively estimates that canvassers will be on the street from 4:30 to 8:30 (i.e., 4 hours). Going out before 5 generally yields minimal results in most areas as many people are at work. Staying out after 8 is not advisable as some canvassers complain they don't feel safe.

Days for Petitioning Assumes for this analysis that the petitioning campaign were this year, and that canvassers work 6 days per week, that petitioning would end on July 6th and thus give attorneys sufficient time to review, bind and file petitions for filing before due date (last day to file in '04 is July 15th). Similar timeframes apply each year based on a 37-day period for petitioning.

Average Votes Needed/AD The average number of votes per Assembly District (AD) necessary for a winning judicial delegate is 1,218. This number was derived through the following calculation involving 6 steps, and the documents on which this analysis rests are included in this exhibit:

1. The average votes received by winning judicial delegate candidates in the only contested judicial delegate races in the Second Judicial District in 2002 (54th, 55th, 56th, and 57th AD) were averaged as follows:  $851(AD54) + 1774(AD55) + 1271(AD56) + 1953(AD57)/4 = 1462$ .

2. The total votes cast in the 2002 primary for gubernatorial candidates (i.e., the top of the ticket) from ADs 54, 55, 56, and 57 were then averaged as follows:  $5,009(AD54) + 6,907(AD55) + 8,927(AD56) + 10,134(AD57)/4 = 7744$ .

3. The percentage of the total vote that was cast for winning judicial delegates (i.e., the vote rate or turnout) was determined by dividing the average votes garnered by a winning judicial delegate in 2002 (1462) by the total votes cast for top-of-the-ticket race in the 2002 primary (7744) to yield a ratio of  $1462/7744$  or 19%.

4. To calculate the top-of-the-ticket figure against which that percentage should then be applied, the last 3 years of elections in Kings and Richmond Counties were used. Specifically, the total votes cast in Kings and Richmond counties for mayor in the 2001 Democratic primary, for governor in the 2002 Democratic primary and, because there were no boroughwide races in 2003, a flat 8% turnout rate was used for that year. (NB: the 2003 figure equals 8% of the Democratic Party enrollment for the 2 counties as of November, 2003). 8% is typical for low-turnout elections in NYC. These three figures were averaged as follows:  $(2001: 261,975 + 2002: 122,521 + 2003: 77,227)/3 = 153,908$ .

5. The turnout percentage for judicial delegate races (.19) was then applied to the combined average number of votes for top-of-the-ticket races in the two counties (153,908) to determine the votes required for a winning judicial delegate across all assembly districts in the entire judicial district, as follows:  $.19 \times 153,908 = 29,243$ .

6. The total number of votes across all assembly districts in the two counties was then divided by the number of assembly districts (24) to yield a final figure of 1,218 votes required per district to prevail as a judicial delegate, as follows:  $29,243/24 = 1,218$

Average IDs Needed/AD "IDs" are those voters whom a campaign targets for door-to-door, mailings, phone bank calls, etc. It is well known that only a percentage of people identified by a campaign as supportive actually vote for the candidate(s) in question. This analysis calculates the number of IDs as 1.5 times the number of votes needed. 1.5 to 1 is a conservative ratio; many campaigns use 1.75:1 or 2:1.

Total IDs Needed This figure equals "IDs" x 24 ADs

IDs/Hour This is a very optimistic estimate, particularly given that many of the likely voters whom canvassers visit will be party loyalists who are hostile to challengers. Many hotly contested campaigns average 2-3 positives per hour. 4 factors in the fact that canvassers will occasionally knock on doors with more than 1 targeted voter and may therefore occasionally get 2 or more positive responses in a single home.

IDs/Shift Optimistic assumption that canvassers can be on the street for 4 full hours a day, something that is often hard to achieve.

Days to Get IDs Voter contact more than 6 or 7 weeks prior to election is generally considered wasted as voters are not yet paying attention.

**Professionals & Consultants**

Lawyers for petition challenges Each AD would be considered an entirely separate case by the courts, with different candidates and different facts. Accordingly, a challenger candidate must expect and be prepared for such separate challenges in each AD.

**Core Staff**

Delegate Finder Must be someone with substantial local community contacts, a difficult person for a challenger candidate to find. Works from March to end of May.

Field Director Responsible for hiring and supervision of all field managers.

Asst Field Director Responsible for recruitment, hiring and turnout of canvassers. Also recruits and coordinates volunteers.

Fundraising Director Campaigns need this person first so you can raise funds for other fundraisers and campaign manager; thus this person is on for 9 months longer than any other staffer.

Campaign Manager Responsible for recruitment and supervision of Field Director, Fundraising Director, Delegate Finder, Admin Director, and Database coordinator; for contracting with vendors; press strategy; and troubleshooting

P/T Database coordinator Programs database software to design targeted worksheets, phone lists, mail lists, reports that monitor progress, etc. This person is a p/t consultant that works from May thru August and is also available for troubleshooting.

Admin Director Handles payroll, bookkeeping, pays bills, oversees data entry of all voter contact responses, prints and files all walk and call sheets on an ongoing basis, maintains filing system, orders supplies, etc.

Overhead These figures for minimum overhead costs are based on my own experiences running campaigns.

**Petition Operation Staff**