LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al. :

Petitioners

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: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

٧.

Respondents

We attach the sworn Affidavits of the following Intervenors:

1. Michael Baker, Chair of the Republican Party of Armstrong County

- 2. Jacqueline D. Kulback, Chair of the Republican Party of Cambria County
- 3. Thomas Whitehead, Chair of the Republican Party of Monroe County
- 4. Patricia Felix, Registered Republican Voter of Northampton County
- 5. Daphne Goggins, Registered Republican Voter of Philadelphia County
- 6. Mark J. Harris, Registered Republican Voter of Snyder County
- 7. Brian McCann, Registered Republican Voter of Philadelphia County
- 8. Martin C.D. Morgis, Registered Republican Voter of Bucks County
- 9. Lisa V. Nancollas, Registered Republican Voter of Mifflin County
- 10. Cynthia Ann Robbins, Registered Republican Voter of Mercer County

Proposed Intervenors reserve the right to file additional affidavits.

Respectfully submitted,

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

/s/ Lawrence J. Tabas

Lawrence J. Tabas, I.D. No. 27815

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

Phone: 215-665-3158

Email: lawrence.tabas@obermayer.com

/s/ Rebecca L. Warren

Rebecca L. Warren, I.D. No. 63669

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

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Philadelphia, PA 19102

Phone: 215-665-3026

Email: rebecca.warren@obermayer.com

/s/ Timothy J. Ford

Timothy J. Ford, I.D. No. 1031863

Admission Pro Hac Vice

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LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al. :

Petitioners

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: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

V.

Respondents

AFFIDAVIT OF MICHAEL BAKER IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF ARMSTRONG

I, Michael Baker, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

- I am a qualified and registered Republican voter of Armstrong County residing in the 3rd Congressional District of Pennsylvania. All of Armstrong County lies within the 3rd Congressional District.
- 2. I am the Chair of the Republican Party of Armstrong County (the "County Committee"). A county committee of a political party is recognized and authorized by state law under 25 P.S. §2837 of the Election Code.¹
- 3. I have a substantial interest in the litigation captioned above (the "Litigation") as a result of my duties and responsibilities as Chair of the County Committee. My duties and responsibilities are set forth in rules and bylaws adopted by the County Committee.
- 4. As part of my role as the Chair of the County Committee, my duties and responsibilities include overseeing the: activities of the County Committee Members; campaigns for all elected offices in the County (including for Congress); and the recruitment of candidates for elected office, including Congress. My duties as the Chair also include fundraising for candidates and for the County Committee (which

¹ Hereinafter, all section references, unless otherwise noted are to the Pennsylvania Election Code, 25 P.S. §§2600, *et seq.* (the "Election Code").

supports the candidates on the Republican ticket in the County), organizing and supervising grassroots campaign activities for the elections (including lawn signs, palm cards, slate cards to support the candidates, including the Congressional candidate), recruiting of volunteers to support the candidates; and communicating and coordinating campaign activities with the Congressional campaign and candidate; the state party, and others. I am also responsible for various Election Day activities and coverage at the polls in the County, including recruiting volunteers to work the polls.

- 5. In addition, pursuant to the Rules and Bylaws of the Republican Party of Pennsylvania, I also have duties regarding filling certain vacancies occurring on the Republican ticket after a Primary Election, including vacancies for the office of Member of Congress.
- 6. I have been actively working to support the re-election of incumbent Congressman Mike Kelly since last year's election. I am currently coordinating campaign activities with Congressman Kelly's campaign team.
- 7. I have invited Congressman Kelly to Committee dinners and other events. I have invited Congressman Kelly to Republican events in the

- county and other events that will be of interest to and promote the Congressman.
- 8. I have introduced donors, volunteers and workers to the Congressman.
- 9. Armstrong County has an annual fundraiser breakfast that Congressman Kelly hosts. He has been actively working throughout the year on activities, recruiting volunteers, and planning for next year's election for Congress.
- 10. If the District lines are re-drawn and Armstrong County is either split between two Congressional districts (as it was for many years) or is taken out of Congressman Kelly's district altogether, it will mean that a lot of my efforts, time and work that I have personally invested to date in Congressman's Kelly's re-election campaign will have been lost.
- 11. I have not sought to recruit any other candidates because I assume that

 Mike Kelly will remain my congressman. If that changes, I will have to
 scramble depending on the district in which we may find ourselves.
- 12. Our timetable for the 2018 Congressional elections includes: County Committee dinners this fall and in February 2018, which feature the candidates for election in 2018 including for Congress; County Party Committee meetings with candidates and to conduct the campaign

continue throughout the year; the first day to circulate nomination petitions for candidates for Congress is February 13, 2018 and last day to circulate is March 6, 2018; our County Committee will consider endorsements of candidates including for Congress, in February or March of 2018.

- 13. In performing my duties, I have relied on the existing Congressional District boundaries, which have existed through three federal election cycles without any challenge. Congressional District boundaries affect such activities as recruiting candidates for Congress, volunteers, and donors; organization of grassroots activities; public political communications in support of Congressional candidates; and allocating campaigning activities and County Committee resources amongst other candidates on the ballot.
- 14. I have a direct and personal interest in this Litigation as it affects both my personal political commitments and activities and my duties as the County Chair related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 15. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.

- 16. I have been actively involved in election activities, which are intended to benefit Republican candidates in the elections for Congress in 2018, such as communicating with the candidate and his campaign committee representatives, inviting the candidate to events to meet and speak with voters, review and identifying issues that could affect the campaign, and generating support for the candidate. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date could be lost if the existing Congressional District in which I volunteer are materially altered.
- 17. I oppose the relief which the Petitioners seek.
- 18. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;

b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as a County Chair. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as County Chair and this Litigation directly affects me personally in ways which they play no role; and

Mone of the named Respondents are Republican committee

members or Chairs of County Committees. As such, I have a

unique and separate perspective regarding the Congressional

Districts and the impact of this Litigation on my rights, which is

distinct from any of the other named parties in this matter.

Michael T. Baker

Sworn and subscribed before me this 27th day of September, 2017.

Winifed S Larden
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Winifred S. Lardin, Notary Public
West Franklin Twp., Armstrong County
My Commission Expires Dec. 31, 2017

THE COMMISSION EXPINES DECLED A LOTABLES

LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al. :

Petitioners

v.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF JACQUELINE D. KULBACK IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF CAMBRIA

I, Jacqueline D. Kulback, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

- I am a qualified and registered Republican voter of Cambria County residing in the 12th Congressional District of Pennsylvania. Cambria County lies within the 12th Congressional District.
- 2. I am the Chair of the Republican Party of Cambria County (the "County Committee"). A county committee of a political party is recognized and authorized by state law under 25 P.S. §2837 of the Election Code.¹
- 3. I have a substantial interest in the litigation captioned above (the "Litigation") as a result of my duties and responsibilities as Chair of the County Committee. My duties and responsibilities are set forth in rules and bylaws adopted by the County Committee.
- 4. As part of my role as the Chair of the County Committee, my duties and responsibilities include overseeing the: activities of the County Committee Members; campaigns for all elected offices in the County (including for Congress); and the recruitment of candidates for elected office, including Congress. My duties as the Chair also include fundraising for candidates and for the County Committee (which supports the candidates on the Republican ticket in the County), organizing and supervising grassroots campaign activities for the elections (including lawn signs, palm cards, slate cards to support the

¹ Hereinafter, all section references, unless otherwise noted are to the Pennsylvania Election Code, 25 P.S. §§2600, *et seg.* (the "Election Code").

candidates, including the Congressional candidate), recruiting of volunteers to support the candidates; and communicating and coordinating campaign activities with the Congressional campaign and candidate; the state party, and others. I am also responsible for various Election Day activities and coverage at the polls in the County, including recruiting volunteers to work the polls.

- 5. In addition, pursuant to the Rules and Bylaws of the Republican Party of Pennsylvania, I also have duties regarding filling certain vacancies occurring on the Republican ticket after a Primary Election, including vacancies for the office of Member of Congress.
- 6. I have been performing and I am continuing to perform the duties and responsibilities described in this Affidavit in connection with the 2018 election for Congress in my County since November 2016. Campaign for members of Congress start far in advance of the year of election, and often begin as soon as the day after the previous election for Congress.
- 7. Since the elections in November 2016, I have consulted on a regular basis with the current member of Congress in my County as to various issues and matters in connection with his campaign for 2018. Activities which I have performed to date in connection with the 2018 campaign for a member of Congress include the following: assisting with

fundraising, including hosting a fundraising event for him, soliciting and encouraging people to contribute to his campaign, working on a regular basis with the representatives of his campaign committee in planning for the 2018 election, meeting with the Congressman and other groups in support of his 2018 campaign, making sure and setting up meetings with him and young Republicans and High School Republicans who can serve as volunteers for his campaigns, inviting him to be the featured guest speaker at County Committee fundraisers and events. I have also started to acquire grassroot materials including lawn signs for the campaign which I have currently in storage. I have attended with him various political events which he can meet volunteers and voters, including a fundraiser with the Speaker of the House of Representatives, Paul Ryan, at various meetings.

8. Activities that I will continue to perform in connection with the

Congressional campaign will include my ongoing regular meetings with

my County Committee members for planning for the Congressional

election in 2018, organizing voter registration drives that will feature our

member of Congress, regular communications on public policy issues

with our member of Congress, communications to voters on behalf of

- his campaign, and organizing and actively participating in nomination petition circulation for his campaign which will begin February 13, 2018, and also arrange for him to be the featured speaker at our County Fall breakfast meeting and our February meeting.
- 9. If Cambria County is taken out of the District, my time and effort will have been wasted. I would have to start over. Even if parts of Cambria County were to remain in the District, my efforts may be wasted as some of the voters and candidates may no longer be in the District as a result of boundary changes.
- 10. Our timetable for the 2018 Congressional elections includes: County Committee breakfast this fall and in February 2018, which feature the candidates for election in 2018 including for Congress; County Party Committee meetings with candidates and his campaign team continue throughout the year; the first day to circulate nomination petitions for candidates for Congress is February 13, 2018 and last day to circulate is March 6, 2018.
- 11. In performing my duties, I have relied on the existing Congressional

 District boundaries, which have existed through three federal election
 cycles without any challenge. Congressional District boundaries affect
 such activities as recruiting candidates for Congress, volunteers, and

donors; organization of grassroots activities; public political communications in support of Congressional candidates; and allocating campaigning activities and County Committee resources amongst other candidates on the ballot.

- 12. I have a direct and personal interest in this Litigation as it affects both my personal political commitments and activities and my duties as the County Chair related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 13. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 14. I have been actively involved in election activities, which are intended to benefit Republican candidates in the elections for Congress in 2018, such as communicating with the candidate and his campaign committee representatives, inviting the candidate to events to meet and speak with voters, review and identifying issues that could affect the campaign, and generating support for the candidate. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date could be lost if the

existing Congressional District in which I volunteer are materially altered.

- 15. I oppose the relief which the Petitioners seek.
- 16. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
 - b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as a County Chair. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as County Chair and this Litigation

directly affects me personally in ways which they play no role; and

None of the named Respondents are Republican committee

members or Chairs of County Committees. As such, I have a

unique and separate perspective regarding the Congressional

Districts and the impact of this Litigation on my rights, which is

distinct from any of the other named parties in this matter.

Sworn and subscribed before me this 27 day of September, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Robert Gerard Nies Jr., Notary Public
City of Johnstown, Cambria County
My Commission Expires June 22, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al.

Petitioners

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٧.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF THOMAS WHITEHEAD IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF MONROE

I, Thomas Whitehead, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

- I am a qualified and registered Republican voter of Monroe County residing in the 17th Congressional District of Pennsylvania. Monroe County lies partly in the 17th Congressional District and partly in the 10th Congressional District.
- 2. I am the Chair of the Republican Party of Monroe County (the "County Committee"). A county committee of a political party is recognized and authorized by state law under 25 P.S. §2837 of the Election Code.¹
- 3. I have a substantial interest in the litigation captioned above (the "Litigation") as a result of my duties and responsibilities as Chair of the County Committee. My duties and responsibilities are set forth in rules and bylaws adopted by the County Committee.
- 4. I have a direct and personal interest in this Litigation as it affects m personal political commitments, activities, duties, and responsibilities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 5. As part of my role as the Chair of the County Committee, my duties and responsibilities include overseeing the: activities of the County Committee Members; campaigns for all elected offices in the County

¹ Hereinafter, all section references, unless otherwise noted are to the Pennsylvania Election Code, 25 P.S. §§2600, *et seq.* (the "Election Code").

(including for Congress); and the recruitment of candidates for elected office, including Congress. My duties as the Chair also include fundraising for candidates and for the County Committee (which supports the candidates on the Republican ticket in the County), organizing and supervising grassroots campaign activities for the elections (including lawn signs, palm cards, slate cards to support the candidates, including the Congressional candidate), recruiting of volunteers to support the candidates; and communicating and coordinating campaign activities with the Congressional campaign and candidate; the state party, and others. I am also responsible for various Election Day activities and coverage at the polls in the County, including recruiting volunteers to work the polls.

- 6. In addition, pursuant to the Rules and Bylaws of the Republican Party of Pennsylvania, I also have duties regarding filling certain vacancies occurring on the Republican ticket after a Primary Election, including vacancies for the office of Member of Congress.
- 7. I have been performing and I am continuing to perform duties and responsibilities described in this Affidavit in connection with the 2018 election for Congress in my County since November 2016. Campaigns for Members of Congress start far in advance of the year of the election,

- and often begin as soon as the day after the previous election for Congress.
- 8. Since the elections in November 2016, I have consulted on a regular basis with Republican County Chairs in the other Counties in the District about the potential candidates and the 2018 campaign.
- 9. In the 17th District I have been actively recruiting candidates to run against the incumbent Democratic Congressman. While the Democrat has won the District, the vote for the Republican candidate has been increasing and the Democrat is winning by smaller margins.
- 10. I have met with two potential candidates and have spoken with two others whom I expect to meet soon. I have interviewed them about their campaign strategies and their positions on issues. I have invited them to County Committee meetings throughout the year to meet the members, as well as the Spring and Fall dinners and other events sponsored by the Committee and Republican club meetings. I have advised them on other activities and events that they can attend. I encouraged them to meet with the College Republicans and the Monroe County Young Republicans. I have personally invested a great deal of time and effort in these activities.
- 11. I am currently working on voter registration in Monroe County.

- 12. If Monroe County is taken out of the 17th District, my time and effort will have been wasted. I would have to start over. Even if parts of Monroe County were to remain in the 17th District, my efforts may be wasted as some of the voters and candidates may no longer be in the District as a result of boundary changes.
- 13. In the 10th Congressional District, we expect to hold a special election before the general election because the President has nominated the incumbent, Tom Marino, to head the Office of National Drug Control Policy.
- 14. If the 10th District is materially altered, the candidate who wins the special election may end up living outside the District come the general election in the fall of 2018. This poses a serious problem for recruitment of candidates and organizing the campaign. I have consulted with other County Chairs about the situation.
- 15. I have been actively recruiting and working with potential candidates for the 10th District who share issues common to the whole district, but the uncertainty over the district boundaries has made recruiting more difficult. I have spoken with potential candidates and invited them to events in Monroe County. However, one potential candidate has said he

- is not interested because of his concern that district lines could be redrawn.
- 16. As county chair I must select conferees from Monroe County to be on the nomination committee for the special election in the 10th District. I am not sure whom to select because the district boundaries may change. Conferees are likely to meet on or before January 2018, even though this case may not have been decided by then.
- 17. The potential candidates for the 10th District and 17th District are already meeting with the National Republican Campaign Committee.
- 18. Our timetable for the 2018 Congressional elections includes: County Committee dinners this fall and in February 2018, which feature the candidates for election in 2018 including for Congress; County Party Committee meetings with candidates and to conduct the campaign continue throughout the year; the first day to circulate nomination petitions for candidates for Congress is February 13, 2018 and last day to circulate is March 6, 2018; our County Committee will consider endorsements of candidates including for Congress, in February or March of 2018.

- 19. In performing my duties, I have relied on the existing Congressional District boundaries, which have existed through three federal election cycles without any challenge. Congressional District boundaries affect such activities as recruiting candidates for Congress, volunteers, and donors; organization of grassroots activities; public political communications in support of Congressional candidates; and allocating campaigning activities and County Committee resources amongst other candidates on the ballot.
- 20. The Petitioners' requested relief would adversely impact my duties and result in harm to me in that if the Congressional District boundaries are changed it could negate all of the activities I have taken and will take up until any change. I face immediate and direct harm and the loss of time, money, and effort relating to the work that I have done to date, which could be lost if the existing Congressional Districts in which I have been performing my duties are materially altered.
- 21. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 22. I have been actively involved in election activities, which are intended to benefit Republican candidates in the elections for Congress in 2018,

such as communicating with the candidate and his campaign committee representatives, inviting the candidate to events to meet and speak with voters, review and identifying issues that could affect the campaign, and generating support for the candidate. I face immediate and direct harm from the Litigation in that the work that I have done to date could be lost if the existing Congressional District in which I volunteer are materially altered.

- 23. I oppose the relief which the Petitioners seek.
- 24. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
 - b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai.

 Their legislative duties and responsibilities are distinctly different from mine as a County Chair. Their principal focus will be on

elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as County Chair and this Litigation directly affects me personally in ways which they play no role; and

none of the named Respondents are Republican committee

members or Chairs of County Committees. As such, I have a

unique and separate perspective regarding the Congressional

Districts and the impact of this Litigation on my rights, which is

distinct from any of the other named parties in this matter.

TRomos Cyfeithal

Sworn and subscribed before me this 387 day of September, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Josephine Ferro, Notary Public
Stroudsburg Boro, Monroe County
My Commission Expires April 2, 2021

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al.

Petitioners

V.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF PATRICIA FELIX IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

SS

COUNTY OF NORTHAMPTON

I, Patricia Felix, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

I am a qualified and registered Republican voter of Northampton
 County residing in the 15th Congressional District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 5. I have been actively involved in election activities, which are intended to benefit Republican candidates in the elections for Congress in 2018 through my involvement with and positions in various organizations, including: member of the executive committee of the Northampton County Republican Committee; President of the Northampton County Republican Women; Assistant Treasurer of the Pennsylvania Federation of Republican Women; and, member of the National Federation of Republican Women.

- 6. I also plan to undertake activities in the future related to the 2018 Congressional elections, such as handing out palm and slate cards and otherwise working at the polls for Republican candidates.
- 7. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date could be lost if the existing Congressional District in which I volunteer is materially altered.
- 8. For example, mailings, phone banks and campaign literature drops for Congressional candidates are district-specific. If the boundaries change materially in the midst of these activities, my own time and effort and financial contributions will have been materially wasted.
- 9. The Petitioners' requested relief would adversely impact my duties and result in harm to me in that if the Congressional District boundaries are changed it could negate all of the activities I personally have taken and will take up until any change.
- 10. I oppose the relief which the Petitioners seek.
- 11. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials

- in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
- b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as an active volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways which they play no role; and
- volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- d) None of the named Respondents are active in any 2018

 Congressional campaigns. As such, I have a unique and separate

 perspective regarding the Congressional Districts and the impact

of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Patricia Felix

Sworn and subscribed before me this 27th day of September, 2017.

lotary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL LAURIE A JOHNS, NOTARY PUBLIC BETHLEHEM TWP, NORTHAMPTON COUNTY MY COMMISSION EXPIRES JUNE 26, 2021

LEAGUE OF WOMEN VOTERS : OF PENNSYLVANIA, et al. :

Petitioners

:

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

v.

Respondents

AFFIDAVIT OF DAPHNE GOGGINS IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF PHILADELPHIA

I, Daphne Goggins, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

1. I am a qualified and registered Republican voter of Philadelphia County residing in the 2nd Congressional District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 5. I have been actively involved in election activities, which are intended to benefit Republican candidates, including those running for election for Congress in 2018. I have been known to speak at political events, roundtables and rallies in order to assert my political preferences, support my candidates, and encourage others to vote for my preferred candidates.
- 6. I also plan to undertake activities in the future related to the 2018 Congressional elections, such as: exercising my First Amendment rights to speak to voters regarding the qualifications of candidates I am supporting; appearing at events and rallies in support of my chosen candidates; and, assisting in any way possible.

- 7. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date could be lost if the existing Congressional District in which I volunteer is materially altered.
- 8. For example, mailings, phone banks and campaign literature drops for Congressional candidates are district-specific. If the boundaries change materially in the midst of these activities, my own time and effort and financial contributions will have been materially wasted.
- 9. I oppose the relief which the Petitioners seek.
- 10. The named Respondents do not adequately represent my interests for the following reasons:
- a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
- b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General

Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as an active volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways which they play no role; and

- c) None of the named Respondents are grass-roots Republican party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- d) None of the named Respondents are active in any 2018 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Daphne/Goggins

Sworn and subscribed before me this $\frac{29}{3}$ day of September, 2017.

Notary Public

NOTARIAL SEAL.

LEAGUE OF WOMEN VOTERS :

OF PENNSYLVANIA, et al.

Petitioners

.

v.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF MARK J. HARRIS IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF SNYDER

I, Mark J. Harris, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

1. I am a qualified and registered Republican voter of Snyder County residing in the 10th Congressional District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I actively volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice. I am a former Chair of the Snyder County Republican Committee and I remain very active in supporting candidates in my County, including for Congress.
- 5. My current Congressman is Tom Marino, who the President has nominated for a federal position. As such, he will be leaving Congress upon his confirmation to the federal position and there will be a Special Election to fill his position, as well as a Primary and General Election in 2018 to elect a Member of Congress for a full term.

- Since the announcement of Congressman Marino's nomination, I have been actively recruiting candidates for Congress from the 10th District. Activities that I have undertaken are: meeting and speaking working with potential candidates from the District, and introducing them to voters and other key political party people for support. I am consulting closely with other party leaders and active volunteers in other counties that are part of the District in an effort to recruit and support a candidate. As a Special Election is likely to be held for this seat maybe before the 2018 Primary, the time frame for my activities to recruit a candidate and establish the campaign is very short. In order to pursue my activities protected under the Pennsylvania Constitution, I relying upon existing District geographic boundaries in order to be able to recruit a candidate and generate support for that candidate for both fundraising and campaign activities.
- 7. I also will be continuing to perform activities related to the 2018

 Congressional election for my District, such as: assisting the

 candidate with fundraising, meeting voters, securing invitations to

 speak at events, raising contributions, recruiting volunteers, and

 organizing grassroots efforts.

- 8. I face immediate and direct harm from the Litigation and the loss of time, money, and effort in that the work that I have done to date could be lost if the existing boundaries of the Congressional District in which I volunteer are materially altered.
- 9. For example, the candidates that are being recruited now may not end up living in the District if the boundaries are changed either before a Special Election or afterwards for the Primary and General Election, and as such they may decline to run. Voters are not likely to support a candidate who does not live in the District. All of the current members of Congress from Pennsylvania live in their Districts. Additionally, my area may be placed into another Congressional District and my efforts for a candidate for the 10th District will have been wasted.
- 10. In addition, future activities that I will be involved with for the Congressional candidate, such as mailings, phone banks and campaign literature drops for Congressional candidates are district-specific. If the boundaries change materially in the midst of these activities, my own time and effort and financial contributions will have been materially wasted.

- 11. The Petitioners' requested relief would adversely impact my duties and result in harm to me in that if the Congressional District boundaries are changed it could negate all of the activities I personally have taken and will take up until any change.
- 12. I oppose the relief which the Petitioners seek.
- 13. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
 - b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the

duties or responsibilities that I have as an active volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways in which they play no role; and

- None of the named Respondents are grass-roots Republican party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- None of the named Respondents are active in any 2018 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Mark / Harrio

Sworn and subscribed before me

this 28 day of September, 2017.

Notary Public

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, et al.

Petitioners

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v.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

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AFFIDAVIT OF BRIAN MCCANN IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF PHILADELPHIA

I, Brian McCann, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

1. I am a qualified and registered Republican voter of Philadelphia County residing in the 1st Congressional District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 5. I have been actively involved in election activities, which are intended to benefit Republican candidates, including those running for election for Congress in 2018. Specifically, as a current Ward leader and Republican Party committee person in Philadelphia, I assist candidates with the legal requirements to get on the ballot, canvass my District to increase support for my candidates, and perform any other political activities necessary or helpful to increase support and attention for my candidates. On a personal level, I take great interest in recruiting and training potential candidates, advising candidates, and helping candidates with fundraising efforts by organizing events at a local level. On a monthly basis, I typically help organize, plan and hold fundraising and other events to not only help candidates, but to also

build and strengthen the Republican party organization at the local level so we can as a whole be more effective in assisting and supporting our candidates.

- 6. I also plan to undertake activities in the future related to the 2018

 Congressional elections, such as continuing to: recruit and advise

 candidates; and, plan and promote fundraisers and events for candidates and related organizations.
- 7. I face immediate and direct harm from the Litigation in that the work that I have done to date could be lost if the existing Congressional District in which I volunteer is materially altered. Specifically, I invest a lot of my own time, money, and effort in recruiting potential candidates and advising Running for political office for most people is not a hasty decision. It takes countless hours of discussion, consideration, recruitment and pledges of support in order to make a candidacy viable. Politics and running for office is unlike most other endeavors in one's personal or professional history. It takes a great deal of effort to recognize, uncover and tap an individual's motivations, character, drive, willingness and ability to endure the challenges of a political race on a very public stage. If the Congressional Districts are altered, a large quantity of my considerable time, money, and effort invested in these efforts would be wasted. Additionally,

in some instances, a large amount of material resources related to planning, fundraising and events for candidates would also be wasted.

- 8. The Petitioners' requested relief would adversely impact my duties and result in harm to me in that if the Congressional District boundaries are changed it could negate all of the activities I personally have taken and will take up until any change.
- 9. I oppose the relief which the Petitioners seek.
- 10. The named Respondents do not adequately represent my interests for the following reasons:
- a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
- b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as an active

volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways in which they play no role; and

- c) None of the named Respondents are grass-roots Republican party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- None of the named Respondents are active in any 2018 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Brian McCann

Sworn and subscribed before me this 25th day of September, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Annette M. Talerico, Notary Public City of Philadelphia, Philadelphia County My commission expires July 26, 2020

LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al.

Petitioners

v.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF MARTIN C.D. MORGIS IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF BUCKS

I, Martin C.D. Morgis, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

- 1. I am a qualified and registered Republican voter of Bucks County residing in the 8th Congressional District.
- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice.
- 5. I have been actively involved in election activities, which are intended to benefit the Republican candidate of my choosing in his re-election to Congress in 2018. I have already committed to an active role to help Congressman Brian Fitzpatrick, and in furtherance of that commitment, I have already started discussing the race with my family, friends, and neighbors to gather support, generate interest in the campaign, and establish leads for potential volunteers.

- 6. I also plan to undertake activities in the future related to the 2018 Congressional elections, such as recruiting people to work the polls and make telephone calls.
- 7. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date could be lost if the existing Congressional District in which I volunteer is materially altered.
- 8. For example, mailings, phone banks and campaign literature drops for Congressional candidates are district-specific. If the boundaries change materially in the midst of these activities, my own time and effort and financial contributions will have been materially wasted.
- 9. I oppose the relief which the Petitioners seek.
- 10. The named Respondents do not adequately represent my interests for the following reasons:
- a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
- b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter,

namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as an active volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways which they play no role; and

- c) None of the named Respondents are grass-roots Republican party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- d) None of the named Respondents are active in any 2018 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Martin C.D. Morgis

Sworn and subscribed before me this day of September, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Matthew C. Hughes, Notary Public

Plumstead Twp., Bucks County

My Commission Expires June 9, 2021

MEMBER, PENNSYLVAN: A ASSOCIATION OF NOTARIES

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, et al.

Petitioners

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: Docket No. 261 MD 2017

THE COMMONWEALTH OF PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF LISA V. NANCOLLAS IN SUPPORT OF APPLICATION TO INTERVENE

COMMONWEALTH OF PENNSYLVANIA

SS

COUNTY OF MIFFLIN

I, Lisa V. Nancollas, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

 I am a qualified and registered Republican voter of Mifflin County residing in the 10th Congressional District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have a direct and personal interest in this Litigation as it affects my personal political commitments, duties, and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 4. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice. I am a former elected official, having served as a Mifflin County Commissioner, and I have worked for and assisted many candidates for public office, including for Congress.
- and the Secretary of the Mifflin County Republican Party. My duties and responsibilities as part of these positions include: recruiting candidates for Congress; fundraising for Congressional candidates; organizing grassroots activities in support of Congressional candidates; and working in conjunction with the Congressional candidate's campaigns.

- 6. My current Congressman is Tom Marino, who the President has nominated be the head of the White House's Office of National Drug Control Policy. Upon his confirmation, there will be a vacancy in his seat and there will be a Special Election to complete his current term, as well as a Primary and General Election in 2018 to elect a Member of Congress for a full term.
- 7. Since the announcement of Congressman Marino's nomination by the President, I have been working to recruit a candidate for Congress from the 10th District. Activities that I have undertaken are: meeting, speaking, and working with other leaders in the District to recruit a candidate for the District. I am consulting closely with other party leaders and active volunteers in other counties that are part of the District in an effort to recruit and support a candidate.
- 3. I expect to be appointed as a conferee to the committee that will select a Congressional candidate for a Special Election to complete the remainder of Congressman Marino's term. A Special Election will most likely occur before the 2018 Primary. As such, the time frame for my activities to recruit a candidate and work on behalf of that campaign is very short.

- 9. If the boundaries of the District are changed before a Special Election or before the Primary, it may negate all of my efforts to recruit a candidate and generate support for that candidate for both the Special Election and 2018 Primary. The candidate recruited may not live in the District or decide not to run in the new District. I may not live in the new District. This Litigation also directly harms my duties as a potential conferee to select a candidate for the Special Election due to the uncertainty of the District's boundaries.
- 10. My activities related to the 2018 Congressional election are continuing and I will be actively assisting the candidate by: arranging outreach events to meet voters; scheduling invitations for the candidate to speak at AG Republican and other events; circulating nomination petitions for the candidate; assisting with fundraising; recruiting volunteers; and organizing grassroots efforts all for the Congressional campaign.
- 11. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort in that the work and activities that I have done to date and that I will be doing could be lost if the existing boundaries of the Congressional District in which I am

- performing the duties is redrawn, either resulting in my candidate or me living outside of the District with less than a year to go before the election for Congress.
- 12. In addition, many grassroots activities that I will undertake for the Congressional campaign, such as mailings, phone banks, and campaign literature drops for Congressional candidates, are all very district-specific. If the boundaries change materially in the midst of these activities, my own time and effort and financial contributions to them will have been wasted.
- 13. I oppose the relief which the Petitioners seek.
- 14. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings;
 - b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator

Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I have as an active volunteer, an officer of the AG Republicans, and as an officer of my County Committee for our candidate for Congress; and this Litigation directly affects me personally in ways in which they play no role; and

- None of the named Respondents are grass-roots

 Republican Party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- d) None of the named Respondents are active in any 2018

 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts

and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Lina V Nancollos

Sworn and subscribed before me day of September, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
Helen E. Kirk, Notary Public
Granville Twp., Miffile County
My Commission Expires Dec. 20, 2019
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LEAGUE OF WOMEN VOTERS

OF PENNSYLVANIA, et al.

Petitioners

V.

: Docket No. 261 MD 2017

THE COMMONWEALTH OF

PENNSYLVANIA, et al.

Respondents

AFFIDAVIT OF CYNTHIA ANN ROBBINS IN SUPPORT OF **APPLICATION TO INTERVENE**

COMMONWEALTH OF PENNSYLVANIA

: SS

COUNTY OF MERCER

I, Cynthia Ann Robbins, hereby submit this Affidavit in support of the Application to Intervene filed in this action, and verify that the statements in this Affidavit are true and correct, based upon my personal knowledge, information and belief. I affirm that I am competent to testify as to the matters stated herein as follows:

1. I am a qualified and registered Republican voter of Mercer County residing in the Third Congressional District. Mike Kelly is the incumbent Congressman from that District.

- 2. As a registered voter, I take interest in political campaigns and candidates, and regularly exercise my voting rights to support the candidates of my choosing.
- 3. I have been actively involved in supporting candidates for public office for many years and have played and continue to play a very active role in political campaigns, including those for Congress. I have and continue to hold political party office and the performance of my duties as part of such office could be materially harmed if the Petitioners' relief is granted.
- 4. I have a direct and personal interest in this Litigation as it affects my personal political commitments and activities related to the 2018 Congressional elections, which are protected under the Pennsylvania Constitution and as recognized and allowed under the Election Code.
- 5. I volunteer my time and resources to recruit, support, and organize campaign activities for candidates of my choice, including for Congress.
- 6. I have been actively involved in election activities, which are intended to benefit Republican candidates in the elections for Congress in 2018.
 Some of those activities included are inviting Congressman Kelly to attend events in Mercer County to meet voters, volunteers, and potential donors; communicating with Congressman Kelly and his campaign

- committee regarding events that will support his campaign for Congress; and working with the Mercer County Republican Committee to support his campaign.
- 7. I also plan to undertake activities in the future related to the 2018

 Congressional elections, such as: inviting Congressman Kelly to

 events in Mercer County to meet voters and further his campaign,

 introducing him to potential donors and volunteers for his campaign;

 working with his campaign committee and the Mercer County

 Republican Committee to generate support for his campaign;

 circulating nomination petitions for him commencing February 13,

 2018; and actively partaking in grassroots efforts in support of his

 campaign.
- 8. I face immediate and direct harm from the Litigation, including the loss of time, money, and effort, in that the work and activities that I have done to date and will be doing up through the November 2018 election could be lost if the existing Congressional District in which I volunteer is materially altered.
- 9. For example, mailings, phone banks and campaign literature drops for Congressional candidates are district-specific. If the boundaries

- change materially in the midst of these activities, my own time and effort and financial contributions will have been materially wasted.
- 10. The Petitioners' requested relief would adversely impact my duties and result in harm to me in that if the Congressional District boundaries are changed it could negate all of the activities I personally have taken and will take up until any change.
- 11. I oppose the relief which the Petitioners seek.
- 12. The named Respondents do not adequately represent my interests for the following reasons:
 - a) My interests do not align with and, in certain respects are contradictory to, the positions asserted by the Democratic officials in this action, namely, the: Governor; Lieutenant Governor; Secretary; and Commissioner, as evidenced by their filings in the Litigation;
 - b) My interests do not completely align with, nor do I have access to or the ability to discuss or influence the Republican Respondents in this matter, namely: Senator Scarnati or Representative Turzai. Their legislative duties and responsibilities are distinctly different from mine as an

active volunteer in elections. Their principal focus will be on elections for the General Assembly next year and not on the elections for Congress. Nor do they perform any of the duties or responsibilities that I do as an active volunteer for our candidate for Congress; and this Litigation directly affects me personally in ways in which they play no role; and

- Republican Party volunteers. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.
- d) None of the named Respondents are active in any 2018

 Congressional campaigns. As such, I have a unique and separate perspective regarding the Congressional Districts and the impact of this Litigation on my rights, which is distinct from any of the other named parties in this matter.

Apropia an Hobbis

Sworn and subscribed before me this <u>27</u>th day of September, 2017.

Notary Public

NOTARIAL SEAL
PLIMPTON L. GRAUL, JR. NOTARY PUBLIC
Greenville, Mercer County
My Commission Expires Dec. 11, 2018