

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHY BARNETTE, individually and as a
candidate for Pennsylvania's 4th Congressional
District and on behalf of all citizen electors of
Berks County, Pennsylvania, et al.

Plaintiffs,

v.

KENNETH E. LAWRENCE JR., Chair of the
Montgomery County Board of Elections and
Vice Chair of the Montgomery County Board of
Commissioners, in his official capacity, et al.

Defendants.

Civil Action No. 2:20-cv-05477

DECLARATION OF JACOB GLENN DANIELS


Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Jacob Glenn Daniels, and I served as a representative for the Montgomery County Republican Party at the pre-canvass on Tuesday, November 3, 2020.
2. On Sunday, November 1, 2020, I went to the Montgomery County Human Services Building, located at 1430 DeKalb Street, Norristown, Pennsylvania, where we received a tour of the facilities where pre-canvassing is supposed to occur beginning at 7:00 a.m. on Election Day.
3. Mr. Kenneth E. Lawrence, Jr. and Mr. Frank Dean were present and provided a tour of the facilities and election equipment.
4. Mr. Lawrence is the Chair of the Montgomery County Board of Elections and Vice Chair of the Montgomery County Board of Commissioners. Mr. Dean is the Mail-In Election Director for Montgomery County.

5. When I first walked into the building, I observed a cart with mail-in ballots located in plain sight. These mail-in ballots were organized by the type of defect. For example, some of the mail-in ballots were placed behind a sign that read “Incomplete Declaration.” Additionally, ballots were placed behind signs that read “Wrong Envelope” and “No Secrecy Envelope.”
6. When I asked about the mail-in ballots in the cart, Mr. Dean explained that Montgomery County regularly inspects and reviews mail-in ballots.
7. Mr. Dean further stated that Montgomery County identifies ballots with errors and contacts the voters and notifies them that they can fix their defective ballots.
8. Mr. Dean acknowledged that he and his staff allowed voters to add their signature to a mail-in ballot after it was submitted and also to add a secrecy envelope to a mail-in ballot after it was submitted. Adding a secrecy envelope to a mail-in ballot requires breaking the seal of the mail-in ballot and then resealing mail-in ballots or potentially providing a new declaration for the outer envelope.
9. On Tuesday, November 3, 2020, I went to the Montgomery County Human Services Building, located at 1430 DeKalb Street, Norristown, Pennsylvania, as a representative of the Montgomery County Republican Committee. I observed a bin of mail-in ballots which were set aside by Montgomery County officials because of some sort of deficiency. Shortly after these ballots were set aside, a Montgomery County employee began handwriting the names of the voters and SURE ID numbers associated with each rejected ballot. The employee eventually provided copies of the handwritten pages to representatives from the Democrat Party as well as to me and Daniel Lewis Cox.

I, Jacob Glenn Daniels, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 3, 2020



Jacob Glenn Daniels