

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

KATHY BARNETTE, individually and as a	:	
candidate for Pennsylvania’s 4 th Congressional	:	
District and on behalf of all citizen electors of	:	Civil Action No. 2:20-cv-05477
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.	:	

DECLARATION OF JULIA VAHEY

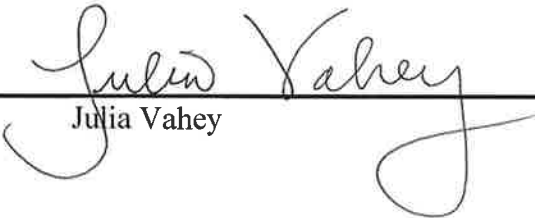
Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Julia Vahey, and I am a representative of the Montgomery County Republican Committee.
2. On Tuesday, November 3, 2020, representatives with Montgomery County Republican Committee received lists of mail-in and/or absentee ballots, which Montgomery County election officials had determined contained defects. These lists were apparently provided to representatives of each party.
3. The lists indicated whether the ballot had issues with the declaration (no address, no date, or no signature) and whether the ballot did not include the secrecy envelope.
4. Some of the lists provided to the representatives included the voter’s SURE ID, however other lists provided no identifying information that would allow the voter to be contacted by a representative other than Montgomery County.

5. The Statewide Uniform Registry of Electors system known as the SURE system stores a unique voter registration number associated with each registered voter in Pennsylvania. The SURE system allows authorized users such as myself to obtain access to a voter's contact information such as the voter's address or phone number.
6. On November 4, 2020, I went to the Montgomery County Human Services Building, 1430 DeKalb Street, Norristown, PA, to view the pre-canvassing and canvassing process. I arrived at roughly 9:30 AM.
7. When I arrived, I spoke with John Marlatt, Senior Assistant Solicitor for Montgomery County, about the differences in the information provided on the lists provided on November 3, 2020 and November 4, 2020. I was informed that some entries on the list did not include name and SURE ID information because the secrecy envelope and ballot had been separated from the declaration envelope. Accordingly, no identification information for the voter was available.
8. Later on November 4, 2020, the lists began having the SURE ID included on all pages and associated with the name of the voter.
9. I was in charge of taking the lists from November 3, 2020 and utilizing the SURE ID and name to ascertain contact information for the individual. At least 10 pages from November 3, 2020, did not provide SURE ID information or names of voters.
10. Neither I nor other people could contact the individuals without a SURE ID on the lists that I received on November 3, 2020. Without the SURE ID, there was no method for me or others to obtain the contact information of the voter to contact the voter to notify them that Montgomery County is allowing voters to change their ballots.

I, Julia Vahey, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 4, 2020



Julia Vahey