

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

SEAN PARNELL, individually and as a
candidate for Pennsylvania's 17th
Congressional District and on behalf of all
citizen electors of Allegheny County,
Pennsylvania; LUKE NEGRON, individually
and as a candidate for Pennsylvania's 18th
Congressional District and on behalf of all
citizen electors of Allegheny County,
Pennsylvania; BRIAN CHEW; and JAY
HAGERMAN,

Plaintiffs,

v.

ALLEGHENY COUNTY BOARD OF
ELECTIONS; RICH FITZGERALD, in his
official capacity as County Executive of
Allegheny County and as a member of the
Allegheny County Board of Elections;
SAMUEL DeMARCO III, in his official
capacity as a member of the Allegheny
County Board of Elections; and BETHANY
HALLAM, in her official capacity as a
member of the Allegheny County Board of
Elections,

Defendants.

DECLARATION OF LUKE NEGRON

I, Luke Negron, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that:

1. I am a citizen of the United States.
2. I currently serve this country as a member of the Pennsylvania Air National Guard.
3. I am a candidate running for Pennsylvania's 18th Congressional District, which covers portions of Allegheny County.
4. I am a Plaintiff in the above-captioned lawsuit.

5. I filed this lawsuit after becoming aware that the Allegheny County Board of Elections issued 28,879 erroneous ballots while refusing to permit poll watchers at satellite voting stations, and no candidate should have to pay \$577,580 to Allegheny County because of their mistakes.
6. I filed this lawsuit on behalf of the citizens of Allegheny County to ensure that their ballots are safeguarded and their votes are protected.
7. I filed this lawsuit to hold the Board of Elections accountable for correcting their mistakes so that no voter from any party is disenfranchised.
8. This lawsuit respects the laws of the Commonwealth of Pennsylvania and respects the intent of all voters affected by the mistakes made by the Board of Elections.
9. I urge my opponent to join my efforts to protect the ballots and integrity of the votes cast by the citizens of Allegheny County.
10. I seek to ensure that every affected voter in Allegheny County has their ballot property handled.
11. I seek to allow all parties to have poll watchers at the satellite voting offices in Allegheny County for the same reason.
12. The magnitude of the number of erroneous ballots, and the potential impact this mistake may have on the election, serves to illustrate why absolute transparency is needed in our election process.
13. Each candidate and their respective supporters should demand full and complete transparency regarding the Board of Elections' handling of all ballots so that the voters have confidence in the outcome of the election.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 22, 2020

By: *Luke E Negrón*
Luke Negrón