

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

CASE NO. 4:18-cv-524-MW-CAS

VOTEVETS ACTIONS FUND,
DEMOCRATIC NATIONAL COMMITTEE,
and DEMOCRATIC SENATORIAL
CAMPAIGN COMMITTEE,

Plaintiffs,

v.

KENNETH W. DETZNER, in his official
Capacity as the Florida Secretary of State,

Defendant.

_____ /

DECLARATION OF BLAISE INGOGLIA

I, Blaise Ingoglia, according to 28 U.S.C. § 1746, hereby state:

1. My name is Blaise Ingoglia. I am over 18 years of age, of sound body and mind, and competent to testify and declare the following facts based on my own personal knowledge.

2. I am the Chairman of the Republican Party of Florida and a member of the Florida House of Representatives. I have been the elected Chairman of Florida Republican Party since January 2015 and have been serving in the House of Representatives since November 2014.

3. As Chairman, I oversaw and was involved with designing and implementing the Republican Party of Florida's campaign strategy and election law framework leading up to the November 6, 2018 election. During that time, the Republican Party of Florida, its candidates, and members relied on existing Florida law to make strategic decisions regarding voter outreach, marketing, and allocation of resources.

4. In the days leading up to the November 6, 2018 election, being aware of the Election Day deadline of 7 p.m. for receipt of vote-by-mail ballots, the Party implemented, among other things, a marketing campaign called the "Walk In Campaign" for the purposes of mobilizing and encouraging Republican voters who had yet to return their vote-by-mail ballots to take action to ensure their vote is counted.

5. In furtherance of this campaign, the Party directed automated telephone calls to targeted Republican voters, advising them that it is now too late to mail-in their absentee ballots and urging them to instead, fill-out their ballot and walk it into their local supervisor of elections office by Monday, November 5th or Tuesday, November 6th. Voters were specifically instructed to NOT place their ballots in the mail, given the proximity of Election Day.

6. In the days leading up to Election Day, the Party also engaged in tailored media placements and advertising campaigns in specific counties that

reflected low numbers of absentee ballots being returned by Republican voters. Among other things, the Party paid for online advertisements that targeted its members through social media platforms and conveyed the importance of walking-in their vote-by-mail ballots. On such ad stated as follows:

If you're seeing this message you most likely have a mail ballot that hasn't been returned. It's now too late to mail it and WE NEED YOUR VOTE! Please fill it out and walk it in to your local elections office Mon or Tues. No need to wait in line! Vote Republican!

7. On November 1st, 2nd, and 5th, 2018, I appeared on various radio stations across Florida to urge voters to walk-in their vote by mail ballots to local elections offices if they had yet to do so.

8. On November 4, 2018, I spoke during a state-wide conference call with Party officials for each of Florida's 67 counties and instructed them to start knocking on doors to urge Republican voters to walk-in their vote-by-mail ballots to local election offices, if they had not already done so.

9. If the deadline for receipt and counting of vote-by-mail ballots is retroactively extended to include ballots received during the 10 day period after the Election Day deadline, as requested by Plaintiffs, the Republican Party of Florida, its candidates, and members will be gravely prejudiced.

10. If I or the Party had known that the Election Day deadline would be rendered meaningless, the Party would have drastically changed its campaign

strategy, voter outreach methods, and allocation of resources for vote-by-mail education and marketing.

11. I and the Party would have done many things differently had we known before the November 6, 2018 election that Florida's longstanding election laws governing the deadline for receipt of vote-by-mail ballots would be extended at all, no less by 10 days.

I say nothing further.

On November 14, 2018, pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Blaise Ingoglia