

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

UNITED STATES OF AMERICA,  Plaintiff,  v.  COMMONWEALTH OF PENNSYLVANIA; and AL SCHMIDT, in his official capacity as Secretary of the State of Pennsylvania,  Defendants.	Case No. 2:25-cv-1481 (Hon. Cathy Bissoon)
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**MOTION TO INTERVENE AS DEFENDANTS OF NICHOLAS MASTON, GREGORY  
PERRY, TODD THATCHER, JOEL DICKSON, TRISHA KENT, LIOR STERNFELD,  
JOHN THOMPSON, THE LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA, AND  
COMMON CAUSE**

Nicholas Maston, Gregory Perry, Todd Thatcher, Joel Dickson, Trisha Kent, Lior Sternfeld, John Thompson, the League of Women Voters of Pennsylvania, and Common Cause (collectively, “Proposed Intervenors” or the “Voter Intervenors”) respectfully move to intervene as of right and become defendants pursuant to Fed. R. Civ. P. 24(a)(2) or, in the alternative, to intervene permissibly under Fed. R. Civ. P. 24(b)(1). A memorandum in support of this Motion to Intervene is filed herewith.

Proposed Intervenors Nicholas Maston, Gregory Perry, Todd Thatcher, Joel Dickson, Trisha Kent, Lior Sternfeld, and John Thompson, are qualified Pennsylvania voters whose interests and rights under federal and/or state law would be threatened should the United States obtain its requested relief. Their respective declarations are appended to this Motion as Exhibits A through G.

Proposed Intervenor the League of Women Voters of Pennsylvania (“LWV-PA”), and Common Cause (“Common Cause”) are nonpartisan membership organizations committed to, *inter alia*, ensuring that all eligible Pennsylvania voters register to vote and exercise their right of suffrage at each election. The relief requested by the United States would threaten their interests and their members’ interests by jeopardizing voters’ privacy, chilling voter engagement, and facilitating baseless voter challenges and other barriers to the free exercise of the right to vote. The declaration of Amy Widestrom, Executive Director of LWV-PA, is appended to this Motion as Exhibit H. The declaration of Suzanne Almeida, Common Cause’s Vice President, States, is appended to this Motion as Exhibit I.

The Voter Intervenor is entitled to intervene as of right under Rule 24(a) because they have (1) filed a timely motion to intervene; and (2) have an interest in the present litigation, that (3) stands to be impaired or affected by the resolution of this case, and (4) are not adequately represented by the existing parties. *See Liberty Mut. Ins. Co. v. Treesdale, Inc.*, 419 F.3d 216, 220 (3d Cir. 2005); Fed. R. Civ. P. 24(a). The Voter Intervenor should, in the alternative, be allowed to intervene permissibly under Rule 24(b) because they have “claim[s] or defense[s] that share[] with the main action a common question of law or fact.” Fed. R. Civ. P. 24(b)(1)(B).

Because this motion is being filed at the initial stages of the litigation, granting this motion will not delay or prejudice the adjudication of any party’s rights. Not all Defendants have filed a responsive pleading and this motion and memorandum provide sufficient notice of the basis for intervention and relief the Proposed Intervenor will seek. Moreover, the lack of prejudice is especially clear here because all deadlines in this case are currently being held in abeyance at the United States’ request due to the government shutdown.

Pursuant to Rule 24(c), Proposed Intervenors have appended as Exhibit J a Proposed Answer to the United States' complaint. Proposed Intervenors reserve the right to file a motion to dismiss pursuant to Rule 12 within the time allotted for the filing of such motions if their Motion is granted.

Defendant the Commonwealth of Pennsylvania takes no position on the Motion and Defendant Secretary Schmidt does not oppose. Plaintiff the United States did not reply to inquiries regarding its position; in response to an email inquiry, Proposed Intervenors received an automatic response indicating that counsel for the United States had been furloughed due to the lapse in government appropriations and the resulting shutdown.

WHEREFORE, Proposed Intervenors respectfully request that the Court grant their motion to intervene as of right or, in the alternative, grant their motion under the standard for permissive intervention.

Dated: October 9, 2025

Respectfully submitted,

/s/ Witold J. Walczak

Ari J. Savitzky\*  
Theresa Lee\*  
Sophia Lin Lakin\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
Tel.: (212) 549-2500  
asavitzky@aclu.org  
tlee@aclu.org  
slakin@aclu.org

Mary M. McKenzie (PA No. 47434)\*  
Benjamin Geffen (PA No. 310134)\*  
Olivia Mania (PA No. 336161)\*  
PUBLIC INTEREST LAW CENTER  
1500 JFK Blvd., Suite 802  
Philadelphia, PA 19102  
(267) 546-1313  
mmckenzie@pubintl.org  
bgeffen@pubintl.org  
omania@pubintl.org

Witold J. Walczak (PA No. 62976)  
Kate I. Steiker-Ginzberg (PA No. 332236)  
AMERICAN CIVIL LIBERTIES UNION OF  
PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
(215) 592-1513

vwalczak@aclupa.org  
ksteiker-ginzberg@aclupa.org

*\* application for admission pro hac vice  
forthcoming*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system on all counsel of record and by email on counsel for the Commonwealth of Pennsylvania and Secretary Schmidt.

/s/ Witold J. Walczak

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

UNITED STATES OF AMERICA,  Plaintiff,  v.  COMMONWEALTH OF PENNSYLVANIA; and AL SCHMIDT, in his official capacity as Secretary of the State of Pennsylvania,  Defendants.	Case No. 2:25-cv-1481 (Hon. Cathy Bissoon)
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**[PROPOSED] ORDER GRANTING MOTION TO INTERVENE**

Upon consideration of the Motion to Intervene as Defendants filed by Nicholas Maston, Gregory Perry, Todd Thatcher, Joel Dickson, Trisha Kent, Lior Sternfeld, John Thompson, the League of Women Voters of Pennsylvania, and Common Cause, along with the materials filed in support thereof, as well as any opposition thereto, the Court finds good cause to grant the motion. The requirements of Rule 24(a) are granted in that the motion was timely filed; the Proposed Intervenors have substantial interests in the case, including their interests in privacy and the unfettered right to vote; the Proposed Intervenors' interests could be affected or impaired by the disposition of the case; and Proposed Intervenors may not be adequately represented by the existing parties. Moreover, the Court would in the alternative grant permissive intervention under Rule 24(b) because the motion is timely and these Proposed Intervenors' participation will aid in the effective airing of issues and the ultimate disposition of the case.

Accordingly, it is hereby ORDERED that the Motion is **GRANTED**.

It is further **ORDERED** that Proposed Intervenor may file a Rule 12 motion within the time-period prescribed by the Federal Rules of Civil Procedure or pursuant to any schedule set by this Court.

**IT IS SO ORDERED**, this \_\_\_\_ day of \_\_\_\_\_, 2025.

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Hon. Cathy Bissoon  
U.S. District Court Judge

# EXHIBIT A



## **DECLARATION OF NICHOLAS MASTON**

I, Nicholas Maston, hereby declare as follows:

1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2) I am 37 years old and am otherwise competent to testify.

3) I am a resident of Swarthmore, Pennsylvania, located in Delaware County. We moved to Swarthmore in July, 2025. Prior to that, my family resided in Media, Pennsylvania, also located in Delaware County.

4) I am a general medicine doctor and geriatrician. I work at a hospital in Philadelphia and at a nursing facility.

5) The right to vote is important to me. I'm an American citizen and I believe in this country and in our democracy. The right to vote isn't a trivial issue to be politicized; it's the way we operate our society. I believe that people on both sides of the aisle agree on that.

6) My family has moved around a lot because my wife and I were both in medical training. We've always been meticulous about changing our documentation in each place we've resided:

a) After medical school, I completed a four-year residency in North Carolina. I changed my driver's license and registered to vote in North Carolina. I also completed a USPS change-of-address form.

b) Next, we moved to Pittsburgh for three years, where I worked at a hospital. I changed my driver's license to Pennsylvania, registered to

vote in Pennsylvania, and again filed the USPS change-of-address form.

c) In 2023, we moved to Chicago for one year of medical training. We did not register to vote in Illinois or change our documents because our intention was to return to Pennsylvania. We *did* file a USPS change of address form to receive our mail in Chicago.

d) In the summer of 2024, we moved to Media, Pennsylvania and were excited to finally settle down. I updated my driver's license address from Pittsburgh to Media and updated my voter registration for Delaware County. Once again, I completed the USPS change-of-address form.

7) I applied for a mail-in ballot in August 2024 and my application was approved by Delaware County on August 28, 2024. A true and correct copy of the Department of State email regarding my mail-ballot application is attached as Exhibit A. After I received and completed the mail-in ballot packet, I returned the completed ballot packet to the ballot drop-box on site at the Delaware County Courthouse in Media, PA in October and received email confirmation that it had been received on October 10, 2024. A true and correct copy of the Department of State email regarding receipt of my mail-ballot is attached as Exhibit B.

8) On November 2, 2024—three days before the Presidential Election—I received an email from Jim Allen, the election director for Delaware County. The email stated that the Board of Elections had received a challenge to my mail-in ballot application. A true and correct copy of the email notice and

challenge is attached as Exhibit C. The document stated that the challenger believed I was “not eligible to vote” on the basis that I had filed a change of address form with USPS when I lived in Chicago.

9) When I received the email, I was shocked and upset. I spent about an hour researching on the internet to see if this was legal. It felt like some person I had never met was trying to disqualify my vote.

10) On November 7, 2024, the Delaware County Board of Elections held a hearing on the 143 challenges that had been filed. I took the morning off work to be able to attend the hearing over Zoom.

11) The process was frustrating and infuriating. It quickly became clear that the challenger didn’t have any individualized evidence or know any of the people who she had challenged. The only basis for the challenges was that the voters had completed the USPS change-of-address form, which the Board explained was not the basis for determining eligibility to vote in Delaware County. Moreover, the challenger testified that she hadn’t done the data analysis herself, and had received a spreadsheet from a group of “concerned citizens” who she refused to identify.

12) The challenge hearing felt like a waste of time and resources. It felt like someone was injecting uncertainty in the election under the guise of “election integrity.”

13) After an extended back and forth with the Board of Elections, the challenger withdrew the challenges. The Board then gave the impacted voters

an opportunity to testify.

a) I testified under oath over Zoom. I told the challenger that I considered it a very serious allegation to suggest that my vote is ineligible to be counted. I invited her to my home—just 1.6 miles away—to verify my eligibility and residence in this county.

b) I testified about the various moves my family had made and explained that we filed the change-of-address form each time. I noted that in addition to the faulty assumptions that were made about the USPS database, the data itself was flawed because it didn't capture the most recent change-of-address form that we filed upon moving back to Pennsylvania in 2024.

c) Finally, I asked the challenger whether there was any financial support provided by a third party to support the cost of the \$10-per-ballot challenges, and she refused to identify who was behind the effort.

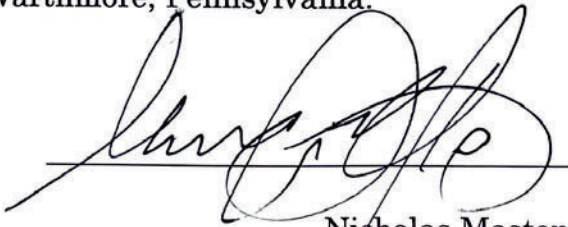
14) My family went through a long and stressful moving process, and we always tried to do everything correctly in terms of updating our documentation. For that to be interpreted as being ineligible to vote in the community where I live is not only an affront to my right to vote, but also to the sense that I am member of this community as much as anyone else. It was upsetting to think that the challenger and I are neighbors in the same community, and this person thinks that I don't have a right to vote here.

15) Based on this experience, I have significant concerns about the

Department of Justice's request for the full, unredacted Pennsylvania voter file. It is not clear to me why they need this information and what processes they are seeking to improve that aren't addressed elsewhere in our system. I don't see how releasing this private data will ensure a fairer election and am concerned that an attempt to use the data may in fact lead to a less certain outcome.

16) I am particularly concerned about the DOJ's request after the experience of having my ballot application challenged last year. An unidentified group found a way to access a lot of data and completely misused it. The mass challenges actually ended up injecting more uncertainty into the election and making the election *less* fair by suspending a significant number of ballots from qualified voters while election results were decided.

Executed this 8<sup>th</sup> of October, 2025 in Swarthmore, Pennsylvania.



Nicholas Maston

# EXHIBIT

# A



Nick Maston [REDACTED]

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**Your Ballot Application Has Been Processed**

1 message

**PA Dept of State, My Ballot** <myballot@pa.gov>

Wed, Aug 28, 2024 at 4:23 PM

To: [REDACTED]

Dear NICHOLAS FRIES MASTON,

The DELAWARE County Election Office has processed your ballot application on 08/21/2024.

Your application status is: Approved.

If your application was approved, you will receive an email when your ballot is being prepared for mailing. You can always check your ballot status at the following Department of State link: <https://www.pavoterservices.pa.gov/Pages/BallotTracking.aspx>

If you have questions about your ballot application, please contact DELAWARE County at 610-891-4659.

Thank you

\*\*\*\*Please do not reply to this email.\*\*\*\*

# EXHIBIT B





Nick Maston [REDACTED]

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**Your Ballot Has Been Received**

1 message

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**PA Dept of State, My Ballot** <myballot@pa.gov>

Thu, Oct 10, 2024 at 4:06 PM

To: [REDACTED]

Dear NICHOLAS FRIES MASTON,

Your ballot has been received by DELAWARE County as of October 10, 2024.

To get more information, you can click here: <https://www.pavoterservices.pa.gov/Pages/BallotTracking.aspx>.

Thank you!

Para leer esta información en español, vaya a <https://www.pavoterservices.pa.gov/Pages/BallotTracking.aspx>.要閱讀此資訊的中文版，請造訪 <https://www.pavoterservices.pa.gov/Pages/BallotTracking.aspx>。**\*\*\*\*Please do not reply to this email.\*\*\*\***

# EXHIBIT C



Nick Maston [REDACTED]

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**NOTICE TO VOTER: OBJECTION FILED AGAINST YOUR MAIL BALLOT**

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Allen, Jim &lt;AllenJ@co.delaware.pa.us&gt;

Sat, Nov 2, 2024 at 10:33 PM

To: "[REDACTED]"

Voter Registration Number 110449006-23

NICHOLAS FRIES MASTON

[REDACTED]  
MEDIA PA 19063-2039

Dear NICHOLAS FRIES MASTON,

**We have received a challenge to your mail/absentee application or your mail/absentee ballot. A copy of the challenge is attached.**

You are welcome and encouraged to respond to the challenge by:

- submitting a statement in an email to [allenj@co.delaware.pa.us](mailto:allenj@co.delaware.pa.us)

– or –

- giving a statement in person at the hearing on these challenges scheduled for 9 a.m. on Thur., Nov. 7, 2024 in the County Council Room, Delaware County Government Center, [201 W Front St.](#) (Orange Street Entrance), Media PA

– or –

- sending a statement in a letter to:

ATTN JAMES ALLEN  
ELECTION DIRECTOR  
DELAWARE COUNTY  
[201 W FRONT ST](#)  
[MEDIA PA 19063](#)

Statements received by Nov. 6 will be provided to the Board of Elections at or before the hearing.

**Thank you for the opportunity to be of assistance.**

Sincerely,

James P. Allen  
Election Director

### **Disclaimer**

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.



**Objection-MastonNF.pdf**

106K



Delaware County  
Bureau of Elections  
201 W. Front St.  
Media, PA 19063

Affidavit to Challenge the Application or Ballot Envelope of a Mail/Absentee Voter

I, PATRICIA BLEASDALE as a voter in EDGMONT TOWNSHIP  
(Name of Voter Filing Challenge) (Municipality)

at 1295 WAKEFIELD CT, GLEN MILLS, PA 19342,  
(House Number, Direction, Street Address of Challenger)

hereby challenge the mail/absentee application OR mail/absentee ballot of

NICHOLAS FRIES MASTON

(Name of Delaware County voter being challenged)

who is registered to vote at: [REDACTED] MEDIA, PA 19063  
(Delaware County address of voter being challenged)

for the following reason(s): SEE ATTACHED

Pursuant to the Pennsylvania Election Code [25 P.S. § 3146.8 (f)], this form must be filed in person with a deposit of \$10 in cash (US currency) for each challenge affidavit. Further, the \$10 deposit shall be subject to forfeiture to the County if the challenge is denied/overruled.

I swear (or affirm) that this challenge is, to the best of my knowledge and belief, true, correct and complete.

Patricia Bleasdale  
Signature of Challenger

10/26/24  
Date

bleasie@gmail.com

Challenger Email

484-459-9563

Challenger Phone

For office use only

Voter Registration Number of Challenger \_\_\_\_\_

Amount in cash received \_\_\_\_\_

Employee who received \_\_\_\_\_

Receipt number \_\_\_\_\_

COUNTY OF DELAWARE  
BUREAU OF ELECTIONS  
OCT 30 PM 3:15

October 21, 2024

Dear DELAWARE County Board of Elections,

I am submitting this challenge to a mail ballot application pursuant to **25 Pa. Stat. § 3146.8(f)<sup>1</sup>**. Based on the following information, I believe that the applicant below is not eligible to vote and therefore I challenge her/his ballot application.

NICHOLAS FRIES MASTON Voter ID: 110449006-23, Address: [REDACTED]  
MEDIA PA 19063

NICHOLAS FRIES MASTON filed a **permanent change of address** with the USPS indicating that she/he was moving to [REDACTED] CHICAGO IL 60661-1700. Our group mailed a letter to NICHOLAS FRIES MASTON informing her/him that she/he was still registered in Pennsylvania and that if she/he wanted to be removed, she/he would have to submit a removal form to the county election office. The letter was mailed to her/him in IL.

Section 704 of the PA Election Code; Rules for Determining Residence<sup>2</sup> says that a person who intends to remain outside of PA permanently or for an indefinite amount of time is not eligible to vote in PA and is not a qualified elector.

Nonetheless, the Department of State mail ballot file indicates that NICHOLAS FRIES MASTON was approved to receive a mail ballot for the November General Election.

Along with this challenge, I am submitting a deposit of \$10.00 cash with the county board. I understand that this deposit will be refunded if this challenge is sustained.

Please don't hesitate to contact me if you have any questions about this challenge.

Thank you,

Patricia Bleasdale  
1295 Wakefield CT, Glen Mills, PA 19342  
Phone (484) 459-9563  
bleasie@gmail.com

2024 OCT 23 P 3:17  
COUNTY OF DELAWARE  
BOARD OF ELECTIONS

Page 1 of 2

2024 OCT 30 P 3:45

COUNTY OF DELAWARE  
BOARD OF ELECTIONS

# **EXHIBIT B**

## **DECLARATION OF GREGORY PERRY**

I, Gregory Perry, hereby declare as follows:

1. I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2. I am 65 years old and am otherwise competent to testify.

3. I was born in Chicago, Illinois and am a United States citizen.

4. I currently reside in London, in the United Kingdom.

5. I am the CEO of the Association for Art History, a not-for-profit learned society in London, which serves both UK and global constituents.

6. Immediately prior to moving to the United Kingdom, I lived in Allentown Pennsylvania, located in Lehigh County, where I served as the Director of the Allentown Art Museum. In 2009, I moved to the United Kingdom to take a position at the National Gallery, London.

7. I have always dearly prized the right to vote, having voted in every election since I was 18 and continuing to vote in federal elections since I moved to the UK. I have cast my votes with appreciation and with pride, valuing and understanding that many Americans over the centuries have given their lives to instill and preserve that right.

8. In September 2024, I applied for an absentee ballot using the Federal Post Card Application. My application was approved a few weeks later, and I received, completed, and returned the ballot. I received confirmation that my ballot was timely received by Lehigh County on October 30, 2024.



9. I was shocked and devastated when I received an email from Lehigh County on Monday, November 4, 2024, notifying me that Pennsylvania State Senator Jarrett Coleman had challenged my right to vote, without any legal or factual basis, just ahead of the November 1 filing deadline. As I later found out, this was part of a mass challenge to overseas voters that Sen. Coleman and others had filed, presumably in an attempt to ensure that his candidate for president would win the electoral votes in the contested state of Pennsylvania.

10. I was incredulous that anyone in the U.S., not least an elected official, would attempt such a brazen, reckless act in order to interfere with an election. I cannot overstate how disturbing, undermining, and personally upsetting this was and still is. My belief in our shared ideal of “government of the people, by the people, and for the people” was upended by an utterly cynical and bad faith actor. The challenger’s attempt to discount the votes of so many legitimate Pennsylvania voters was, in a word, un-American. I am offended that one American would do this to another and am demoralized over the prospect that future elections in Pennsylvania and in other states could be delegitimized by similar actions.

11. On November 6, 2024, the day after the Election, I received another email from Lehigh County stating that Sen. Coleman had withdrawn the challenges to the overseas voters’ absentee ballots.

12. Given this experience, I am very concerned that less than one year later, a department of the federal government is attempting to obtain personal

information about voters in Pennsylvania and in other states which it has no right to. As with my right to vote, I also value my right to privacy. It is hard to envision any legitimate reason as to why the Department of Justice would need this information. I trust the Commonwealth to collect my personal information and keep it private solely for the purpose of certifying my right to vote in the state. It is legally required to do so. I strongly object to the attempt by the DOJ to obtain my sensitive, personal information, and I do not agree to have it shared with that department. There is no reason why they need this information and, with the untoward actions in Pennsylvania last year, I am suspicious that it may be used in some fashion to interfere with future elections.

13. Prior to a career in museums and the arts, I practiced law in Illinois. When admitted to the bar in that state and when sworn in to practice at the bar in the Northern District of Illinois, I took an oath to uphold the Constitution of the United States. In joining this action with the Commonwealth of Pennsylvania, I am honoring that oath—without free and fair elections our Constitution is made moribund, and we must be vigilant to protect them from interfering elected officials and overreaching government departments.

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

Signed on the 9<sup>th</sup> day of October, 2025, in London, United Kingdom

  
Gregory Perry

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# EXHIBIT C

## **DECLARATION OF TODD THATCHER**

I, Todd Thatcher, hereby declare as follows:

1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2) I am 58 years old and am otherwise competent to testify.

3) I am a resident of West Grove, Pennsylvania, located in Chester County.

4) I am a print media specialist and have worked in graphic design for more than 30 years.

5) I believe that voting is the right and duty of every U.S. citizen. I vote in every major election, and have voted for both Democratic and Republican candidates.

6) I have serious concerns about the Department of Justice requesting access to the Pennsylvania voter file containing voters' sensitive information. Last year, I was one of the thousands of Pennsylvania voters whose mail ballot application was challenged in what appears to have been a coordinated effort to throw out votes.

7) My wife and I have lived in Pennsylvania for most of our lives. We moved back to the state in August, 2024, after four years living in California because of my wife's job. When we moved back to Pennsylvania, we re-registered to vote, got Pennsylvania drivers' licenses, and bought a home in West Grove.

8) I applied for a mail-in ballot from Chester County for the 2024 Presidential Election and my application was approved by Chester County Voter Services. I received, completed, and returned my mail-in ballot on time.

9) About a week before the election, I received a letter from Chester County that was dated October 26, 2024. A true and correct copy of the letter is attached as Exhibit A.<sup>1</sup> The notice letter stated that Chester County had received a challenge to my mail-ballot application, on the basis that I had completed a change of address form with the United States Postal Service. My wife received the same letter stating that she had been challenged.

10) When I received the letter, I was shocked, outraged, and agitated. I had never received anything like this before. I immediately gathered relevant documentation and emailed it to Voter Services, showing that I am a qualified, registered Chester County voter.

11) The Chester County Board of Elections held a hearing on November 1, 2024 to hear the challenges filed against 212 mail-ballot voters. The voters had been challenged based on having completed the USPS change of address form.

12) I attended the hearing on behalf of myself and my wife. The challenger's attorney specifically mentioned us when referencing a group of 13 voters who they said were registered in other states.

13) When it was time to hear testimony from the challenged voters, I

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<sup>1</sup> The handwriting on the challenge letter is my own notes and questions that I wrote upon receiving the letter.

was initially nervous; public speaking is not my forte. But after hearing testimony from a military spouse who had been challenged, I got fired up and decided to get my story out. I explained how my wife and I had moved back to Pennsylvania after living in California. I also explained that I had been registered in California and completed the USPS form, and that I re-registered in Pennsylvania when we moved back. I completed the USPS form *again* when we moved to Chester County in 2024.

14) At the conclusion of the hearing, the challenger's attorney withdrew the challenge against me and my wife. Then, the Chester County Board of Elections voted unanimously to dismiss all the challenges filed against the voters, based on a finding that the challenger did not present credible evidence and had failed to meet her burden of proof as required by law.

15) I am still irritated about the experience of being challenged. I don't think it's right that a person can make mass challenges against hundreds of people's right to vote based on such flimsy evidence. I still have strong feelings toward the challenger who brought this; it feels like it should be illegal to have your right to vote called into question in this way. The process felt like a form of intimidation and like they were trying to scare people away from voting.

16) I am very concerned about the Department of Justice seeking access to the full voter file with everyone's sensitive, personal information. I've seen reports about how DOGE mishandled people's sensitive data. This is an issue of voter privacy, but I am concerned that they will use the data for other

purposes as well.

17) I am concerned that what happened to me last year could happen again to me or to other voters in the future.

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

Executed this 8 of October, 2025 in West Grove, Pennsylvania.

A handwritten signature in black ink, appearing to read "Todd Thatcher", written over a horizontal line.

Todd Thatcher

# EXHIBIT

# A



Our registration in CA should have been cancelled by PA when we registered to vote in PA?



# THE COUNTY OF CHESTER



## BOARD OF ELECTIONS:

Josh Maxwell, Chair  
Marian D. Moskowitz, Vice Chair  
Eric M. Roe, Commissioner

## CHESTER COUNTY VOTER SERVICES

Government Services Center  
601 Westtown Road, Suite 150  
P.O. Box 2747  
West Chester, PA 19380-0990  
(610) 344-6410 FAX: (610) 344-5682

Karen Barsoum  
Director

October 26, 2024

8:30 - 4:30  
M - F

TODD G THATCHER

Voter Registration Number: 011772418-15

Dear TODD G THATCHER

We have received a challenge to your mail/absentee ballot application. The challenge alleges that you filed a permanent change of address with the United States Postal Service.

If you have any evidence that you are a qualified elector of Chester County or if you wish to respond to this challenge by:

- calling our office at 610-344-6410
- submitting an email to [ccclectionofficials@chesco.org](mailto:ccclectionofficials@chesco.org)
- appear at the hearing for this and other challenges currently scheduled for Friday November 1 at 12 p.m. at 313 W. Market Street, 6<sup>th</sup> Floor, Meeting Room #6276, West Chester PA.

**Please reference your voter registration number in any correspondence: [Voter Registration Number]**

If you have not yet returned your completed mail-in or absentee ballot, you are still permitted to do so. However, please be advised that all challenged ballots will be segregated until the outcome of the hearing and any appeals.

You also may go to your Polling Place and vote by casting a Provisional Ballot on Election Day (Tuesday, November 5, 2024). The elections staff at your polling place will assist you. As a reminder, the polls are open from 7AM to 8PM on Election Day. To find your polling place, visit [www.chesco.org/elections](http://www.chesco.org/elections).

If the claim in the challenge is that you are registered in more than one jurisdiction, please note the following:

- If you never registered in that other jurisdiction, please note that in your response.
- If both registrations are yours but one of these registrations is outdated, contact that jurisdiction to ask about steps to cancel that outdated registration.
- Although a US citizen may be registered in more than one jurisdiction, attempting to vote more than once in the same election is a criminal offense.

If you have questions about this matter, please call our offices at 610-344-6410.

Sincerely,

*Karen Barsoum*

Karen Barsoum, Director  
Voter Services

Name of Person representing the people?  
at the hearing

Unfounded Challenge

\* Was this Challenged by Sworn Affidavit?



# EXHIBIT D

## **DECLARATION OF JOEL DICKSON**

I, Joel Dickson, hereby declare as follows:

1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2) I am 58 years old and am otherwise competent to testify.

3) I am a resident of West Chester, Pennsylvania, located in Chester County.

4) I work in the financial services industry and am a leading expert on the impact taxes have on investors' savings and portfolio choices. I previously worked as a staff economist at the Federal Reserve Board and hold a Ph.D. in economics from Stanford University.

5) I believe that the right to vote is a paramount part of our civic duty. I am registered as "No Affiliation," and when I do exercise my right to vote, I base my decision on the issues that are important to me, rather than voting for the candidate from a particular political party.

6) In October 2024, I applied for a mail-in ballot from Chester County for the General Election. My application was approved by Chester County. I received, completed and returned my mail-in ballot packet shortly thereafter, and the Department of State tracker indicated that Chester County Voter Services received my mail-in ballot on October 23, 2024.

7) About a week before the Presidential Election, I received a letter dated October 26, 2024 from Chester County Voter Services informing me that

my mail ballot application had been challenged. A true and correct copy of the notice letter is attached as Exhibit A. The letter stated that the reason for the challenge to my mail-ballot application was that I had filed a permanent Change-of-Address form with the U.S. Postal Service (USPS).

8) After I received the letter, I was frustrated that my vote in the upcoming election might not be counted. I was also determined to fight this challenge, because I knew I had done everything to be a properly registered voter in Chester County, Pennsylvania.

9) I immediately called Chester County Voter Services. I also sent an email to the Chester County election official explaining my voting history. I am a duly registered Pennsylvania voter, and I wanted to ensure that my ballot would be counted in the Presidential Election.

10) I moved to Chester County for my job in 1996 and registered to vote in Pennsylvania. In May 2022, I relocated to Collin County, Texas for my company. At that time, I filed a permanent Change-of-Address form with the USPS and registered to vote in Texas.

11) In 2024, I moved back to Pennsylvania for my job and re-established residency in Chester County. I purchased a home in June 2024 and obtained a Pennsylvania driver's license in August, 2024. During that process, I also re-registered to vote in Pennsylvania. In August, 2024, upon leaving Collin County, TX, I *once again* filed a Change-of-Address form with USPS, changing my permanent address to Chester County, Pennsylvania.

12) Upon receiving the letter notifying me of the challenge to my registration, I was immediately surprised by how easy it seemed to be to challenge a registration with no knowledge of my situation or evidence of wrongdoing on my behalf. All of a sudden, it felt that I had to prove my registration was valid or my registration would be deemed invalid — kind of a version of guilty until proven innocent. Yet, I knew that I had followed all the requirements for registration in Chester County, PA and that the County had approved my mail-ballot application based on its own processes. Within a few days, I learned from an article in the Philadelphia Inquirer that this was part of a broader effort to challenge a large number of mail ballot voters in Chester County.

13) The Chester County Board of Elections held a hearing on November 1, 2024 to hear the challenges filed against 212 mail-ballot voters, like myself, who had all been challenged by the same individual.

14) Although I could not attend the hearing in person, I later reviewed the video of the challenge hearing. I was among the 13 voters who were specifically mentioned by name by the challenger's attorney because of my previous out-of-state voter registration.

15) The Chester County solicitor presented my emailed statement, explaining that I had moved back to Pennsylvania in 2024 and properly registered to vote in the state. The challenger withdrew the challenge to my mail ballot application at the hearing.

16) At the conclusion of the hearing, the Chester County Board of Elections voted unanimously to dismiss all the challenges filed against the remaining voters, based on a finding that the challenger did not present credible evidence and had failed to meet her burden of proof as required by law.

17) At the time, I believed the challenge was unwarranted and frivolous, yet I needed to respond or risk losing my right to vote in the 2024 Presidential Election. I do not know what might have happened had I not emailed a statement detailing the steps I took to register to vote in PA. I should have never needed to do that, as my registration and mail-ballot application were already approved by Chester County. This is not a partisan issue, it is a *voting rights* issue. Someone attempted to invalidate my vote in the last Presidential Election based on an invalid reason using erroneous interpretations of my personal data, and based on information (the USPS change-of-address form) that is not used by the County to determine eligibility to vote.

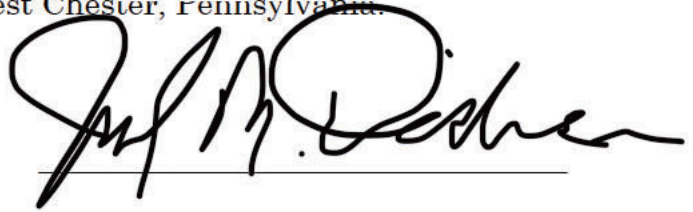
18) I believed at the time that these challenges were a malicious attempt to disenfranchise legitimate Chester County voters like myself in the Presidential Election. I continue to be angry at how easy it was to attempt to disenfranchise me by misusing information about my state of legal residence based off of an outdated internet search, after I had provided all of the required and proper information (under penalty of perjury) to the Commonwealth of Pennsylvania and Chester County for the approval of my voter registration.

19) My experience suggests that almost any challenge to a person's

right to vote could be brought by people making incorrect, incomplete or even nefarious interpretations about the personal data of a registered voter.

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

Executed this 8 of October, 2025 in West Chester, Pennsylvania.

A handwritten signature in black ink, appearing to read "Joel M. Dickson", written over a horizontal line.

Joel Dickson

# EXHIBIT

# A





# THE COUNTY OF CHESTER



## BOARD OF ELECTIONS:

Josh Maxwell, Chair  
Marian D. Moskowitz, Vice Chair  
Eric M. Roe, Commissioner

## CHESTER COUNTY VOTER SERVICES

Government Services Center  
601 Westtown Road, Suite 150  
P.O. Box 2747  
West Chester, PA 19380-0990  
(610) 344-6410 FAX: (610) 344-5682

Karen Barsoum  
Director

October 26, 2024

JOEL MALCOLM DICKSON

Voter Registration Number: 110342717-15

Dear JOEL MALCOLM DICKSON

We have received a challenge to your mail/absentee ballot application. The challenge alleges that you filed a permanent change of address with the United States Postal Service.

If you have any evidence that you are a qualified elector of Chester County or if you wish to respond to this challenge by:

- calling our office at 610-344-6410
- submitting an email to [ccelectionofficials@chesco.org](mailto:ccelectionofficials@chesco.org)
- appear at the hearing for this and other challenges currently scheduled for Friday November 1 at 12 p.m. at 313 W. Market Street, 6<sup>th</sup> Floor, Meeting Room #6276, West Chester PA.

**Please reference your voter registration number in any correspondence: [Voter Registration Number]**

If you have not yet returned your completed mail-in or absentee ballot, you are still permitted to do so. However, please be advised that all challenged ballots will be segregated until the outcome of the hearing and any appeals.

You also may go to your Polling Place and vote by casting a Provisional Ballot on Election Day (Tuesday, November 5, 2024). The elections staff at your polling place will assist you. As a reminder, the polls are open from 7AM to 8PM on Election Day. To find your polling place, visit [www.chesco.org/elections](http://www.chesco.org/elections).

If the claim in the challenge is that you are registered in more than one jurisdiction, please note the following:

- If you never registered in that other jurisdiction, please note that in your response.
- If both registrations are yours but one of these registrations is outdated, contact that jurisdiction to ask about steps to cancel that outdated registration.
- Although a US citizen may be registered in more than one jurisdiction, attempting to vote more than once in the same election is a criminal offense.

If you have questions about this matter, please call our offices at 610-344-6410.

Sincerely,

*Karen Barsoum*

Karen Barsoum, Director  
Voter Services

# EXHIBIT E

## **DECLARATION OF TRISHA KENT**

I, Trisha Kent, hereby declare as follows:

1. I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2. I am 43 years old and am otherwise competent to testify.

3. I currently reside in Richmond Hill, Ontario, Canada.

4. My last residence in the United States was in Beaver County, Pennsylvania.

5. I was born and raised in Beaver County. I attended K-12 school in the county, and my parents continue to reside in the same house where I grew up.

6. In 2005, I married a Canadian and moved abroad to be with him. I have continued to vote by absentee ballot since moving to Canada, as I am entitled to do under federal law.

7. Voting is very important to me. I'm an American citizen, and voting is the only way you can make your voice heard. I always say that if you don't vote, you give up your right to complain.

8. Ahead of the November 2024 Presidential election, I completed the Federal Post Card Application (FPCA) to request my absentee ballot. I provided all the qualifying information to show that I have a right to vote in Beaver County, Pennsylvania.

9. I take voting very seriously and always make sure to complete the

process early to ensure that my ballot arrives on time. I received the ballot in September, filled it out, and sent it back via registered mail with a tracking number. I received an email from the Pennsylvania Department of State that my ballot was received by Beaver County on September 30, 2024.

10. The day before the election, November 4, 2024, I received an email from the Beaver County Election Bureau informing me that it had received 125 challenges to applications for Federal Absentee Ballots, and that my ballot was among those challenged. The Board also informed me that it would hold a hearing at 3pm on November 7, 2024, and that I could submit written comments or attend the hearing. A true and correct copy of the challenge notice that I received is attached as Exhibit A.

11. When I received this notice, I was furious. I wanted to know who had brought these challenges and how this had happened. Upon reflection, I believe that these challenges were politically motivated and that the challenger was trying to cry voter fraud before anything even happened.

12. I sent an email response to the Beaver County Election Bureau stating that I was born and raised in Pennsylvania, and that I believed this effort to be voter suppression. A true and correct copy of my email response is attached as Exhibit B.

13. I attended the Beaver County Board of Elections hearing on November 7, 2024 via Zoom. In the end, the Board voted to reject the challenges because the challenger did not carry his burden of proof.

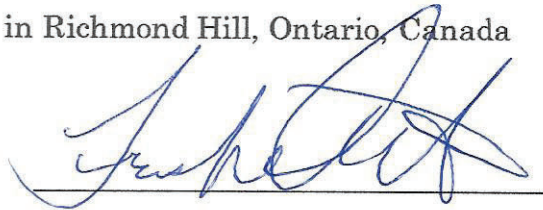
14. The experience of having my absentee ballot challenged was very scary. I didn't realize that so much of my information is available, and I don't think a random person who I've never heard of should be able to challenge me like that. I have a right to vote, I exercised that right, and I followed the proper procedures for a federal voter.

15. I have concerns about the federal government's request for voters' sensitive data. It's the state's responsibility to manage my sensitive information and this is an example of the federal government overstepping its bounds.

16. I am scared that more of these mass challenges will happen in the future. I fear that democracy is on the line, and I worry that they're ultimately going to take away my right to vote entirely.

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

Signed on the 7<sup>th</sup> day of October, 2025, in Richmond Hill, Ontario, Canada

A handwritten signature in blue ink, appearing to read 'Trisha Kent', written over a horizontal line.

Trisha Kent

# EXHIBIT

# A





Outlook

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**Ballot Application Challenged**

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**From** Elections <elections@beavercountypa.gov>**Date** Mon 2024 11 04 5:43 PM**To** Elections <elections@beavercountypa.gov>

Dear Overseas Voter:

On Friday November 1, 2024, the Beaver County Bureau of Elections received 125 challenges to various applications for Federal Absentee Ballots under [25 PS § 3146.8\(f\)](#). Your ballot request was among those challenged. As such, the Beaver County Board of Elections will be holding a review hearing on Thursday, November 7, 2024 at 3 PM Eastern Standard Time in Courtroom 4 of the Beaver County Courthouse. Although your attendance/participation is not mandatory; as one of the challenged voters, you have the right to attend the hearing; and if necessary, to provide supplemental evidence if the challenger meets his burden of proof related to your specific application.

All challenged voters are able to attend virtually, and if you would like to submit written comments to be added to the record you are able to do so. Please be aware of the following:

- 1) If you would plan to participate via video conference upon the introduction of specific evidence related to your challenge, please reply to this email indicating such by no later than 5 PM Eastern Standard Time on Wednesday, November 6, 2024.
- 2) If you would want to submit written comments regarding the challenge of your application to vote via absentee ballot, please do so in a reply to this email by no later than 11 AM Eastern Standard Time on Thursday, November 7, 2024.

Best Regards,

Beaver County Election Bureau

# EXHIBIT B





Outlook

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**Re: Ballot Application Challenged**

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**From** Trisha Kent [REDACTED]  
**Date** Tue 2024 11 05 7:47 AM  
**To** Elections <elections@beavercountypa.gov>

Good morning,

I do want to attend this hearing virtually. Please provide me with the necessary information. I would also like to know who is challenging my vote and why.

I would also like to submit that I am an American citizen born and raised in Pennsylvania. I have voted in every election since I turned 18, most of them by absentee ballot. I will not let this person/people take away my right to vote. I can provide proof of my social security number, American passport, tax return, etc. although I do not believe that I need to. At the time that I requested my absentee ballot, I provided all of the necessary information to receive it. That should be all that I had to do instead of having to attend this hearing to save my vote. What is happening here is voter suppression.

Thank you,  
Trisha Kent (she/her/hers)

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**From:** Elections <elections@beavercountypa.gov>  
**Sent:** November 4, 2024 5:43 PM  
**To:** Elections <elections@beavercountypa.gov>  
**Subject:** Ballot Application Challenged

Dear Overseas Voter:

On Friday November 1, 2024, the Beaver County Bureau of Elections received 125 challenges to various applications for Federal Absentee Ballots under [25 PS § 3146.8\(f\)](#). Your ballot request was among those challenged. As such, the Beaver County Board of Elections will be holding a review hearing on Thursday, November 7, 2024 at 3 PM Eastern Standard Time in Courtroom 4 of the Beaver County Courthouse. Although your attendance/participation is not mandatory; as one of the challenged voters, you have the right to attend the hearing; and if necessary, to provide supplemental evidence if the challenger meets his burden of proof related to your specific application.

All challenged voters are able to attend virtually, and if you would like to submit written comments to be added to the record you are able to do so. Please be aware of the following:

1) If you would plan to participate via video conference upon the introduction of specific evidence related to your challenge, please reply to this email indicating such by no later than 5

PM Eastern Standard Time on Wednesday, November 6, 2024.

2) If you would want to submit written comments regarding the challenge of your application to vote via absentee ballot, please do so in a reply to this email by no later than 11 AM Eastern Standard Time on Thursday, November 7, 2024.

Best Regards,

Beaver County Election Bureau

# **EXHIBIT F**

## DECLARATION OF LIOR STERNFELD

I, Lior Sternfeld, hereby declare as follows:

1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2) I am 45 years old and am otherwise competent to testify.

3) I reside in State College, Pennsylvania with my wife and children.

4) I am a Professor of History and Jewish Studies at Penn State University.

5) I am originally from Israel. I came to the United States in 2009 to pursue a Ph.D. at the University of Texas in Austin. In 2015, I began a tenure-track position at Penn State University, which allowed me to begin the green card process. My wife and I received our green card status in 2018.

6) When we realized that living in the United States was not a temporary decision, and especially after our children were born in this country, we became very invested and involved in life here—in American society and in our American community. From that moment on, I knew that my ability to fully become part of this community was by becoming a United States citizen.

7) Five years after receiving my green card, I applied for naturalization. The process was straightforward and in November, 2023, my wife and I became United States citizens.

8) Voting is the most crucial decision that a citizen can make. It is an opportunity to shape the government, to voice my opinion, and to express my

opposition. It is the way that I can be part of the civic conversation and is a citizen's most patriotic duty.

9) The first year I was able to vote as a naturalized U.S. citizen was in 2024. I had waited for so long to be able to vote and to participate in this process. The experience of voting for the first time was truly uplifting and exciting, especially in a state like Pennsylvania where the closeness of elections demonstrates how consequential our votes are.

10) However, I am concerned that the current administration will explore every opportunity to suppress votes. They have even publicly floated the idea of de-naturalizing citizens. I want to exercise my rights as a citizen, but I am worried that some in power do not share my beliefs in the rule of law and the rights of citizens.

11) When I learned that the Department of Justice had requested the voter records from Pennsylvania, including with sensitive data, I became concerned about how they might try to manipulate these lists. I believe that recently naturalized citizens are perhaps more vulnerable than other groups of voters to certain types of false allegations about illegal voting.

12) I care about the privacy of my personal data and about the integrity of the voting system. I believe that we should make the electoral process more welcoming to every eligible voter and not try to intimidate voters or expunge voters from lists. The Constitution says that states should run their own elections, and I believe that the states should be able to maintain their voter

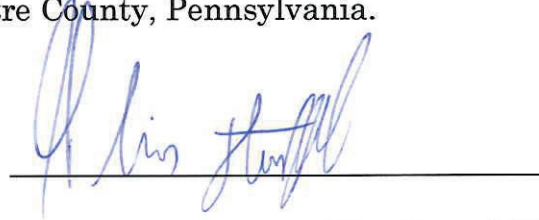
rolls without interference from the federal government.

13) Having lived in and studied the Middle East for decades, with a scholarly focus on Iran, I know how fragile political systems are. These systems are never as resilient as people think, and it takes very few steps to fall from a democracy—however flawed—into a dictatorship. Messing with elections is perhaps the easiest step to take in the process of sliding down the ladder from democracy to dictatorship.

14) Naturalized citizens are people who have chosen to live here. They typically have more faith in the American system than many American-born citizens. We vote to preserve this belief in the American democracy.

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

Executed this 9 of October, 2025 in Centre County, Pennsylvania.



Lior Sternfeld

# EXHIBIT G



## **DECLARATION OF JOHN THOMPSON**

I, John Thompson, hereby declare as follows:

1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2) I am 63 years old and am otherwise competent to testify.

3) I am a resident of Philadelphia, Pennsylvania.

4) I currently work as an organizer with the Abolitionist Law Center, where I help manage campaigns around ending solitary confinement in prison and advocating for the release of aging and geriatric people who are imprisoned.

5) I spent more than 37 years in Pennsylvania state prisons. I was convicted at the age of 17 and sentenced to life-without-parole, or “death by incarceration.” I was released from prison in 2017.

6) While incarcerated, I worked at the prison’s legal clinic for many years and co-founded a grassroots organization that advocates for social and political issues.

7) I registered to vote as soon as I came home from prison. Voting is very important to me. It’s every citizen’s civic duty and gives you a voice in the political process. If you don’t vote, you can’t complain and you can’t be a part of the solution.

8) Voting in 2017 was an important first-time experience. I had never been able to vote before because I was incarcerated from before the time I turned 18 years old.



9) A lot of people in Pennsylvania return from prison and don't know they have regained the right to vote. In my current role, we work with partner organizations to educate formerly incarcerated people with felony convictions about their right to vote.

10) This issue is very important to me. I've voted in almost every single election since coming home from prison. There are some people with felony convictions in the United States who are not allowed to vote. When you strip that from us, you strip away our civil liberties. We've been in prison, we've paid our time, and now we're back in society as productive, tax-paying citizens. The right to vote is an important part of being a citizen, and people with felony convictions should not be excluded.

11) I have concerns about the privacy of my data. I don't know what the federal government wants to do with my personal information, and the federal government has not shown a compelling reason that they need all that information about me and other Pennsylvania voters.

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

Executed this 9 of October, 2025 in Philadelphia, Pennsylvania.

\_\_\_\_\_

John Thompson

# EXHIBIT H

## DECLARATION OF AMY WIDESTROM

I, Amy Widestrom, hereby declare as follows:

1. I have personal knowledge of the matters in this declaration, and this is what I would testify to if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am a resident of and registered voter in Montgomery County, Pennsylvania.
4. I am the Executive Director of the League of Women Voters of Pennsylvania (“the League” or “LWVPA”). I have held this position since January 2024.
5. The League is a nonpartisan statewide non-profit organization that was formed in 1920 (incorporated in 1923). The League and its members are dedicated to helping the people of Pennsylvania exercise their right to vote, as protected by the law. The League encourages informed and active participation in government, works to increase understanding of major public policy issues, and seeks to influence public policy through education and advocacy. The League is a predominantly volunteer organization and has 32 member chapters around the Commonwealth.
6. LWVPA has nearly 2,500 individual members who are registered voters and regularly vote in state and federal elections. The League has active members in nearly every county in Pennsylvania.
7. The League’s mission is to empower voters and defend democracy, which includes voter registration, education, and get-out-the-vote drives. During

every election cycle, the League conducts voter-registration drives, staffs nonpartisan voter-registration tables at naturalization ceremonies, educates incarcerated and formerly incarcerated individuals about their voting rights, and works with local high schools and universities to register young voters. It also maintains an online database called VOTE411, a nonpartisan and free digital voter resource with information available in both English and Spanish, including registration information, voter guides, mail-in ballot information, candidate information, polling rules and locations.

8. LWVPA has members who are naturalized citizens, who have recently moved within or to Pennsylvania, or who have other traits that put them at risk of baseless challenges to their eligibility to vote by mail or to vote at all. These members, and indeed all LWVPA members, have reason to fear violations of their privacy if the United States gets the sensitive data it seeks through this litigation.
9. LWVPA's membership rolls include elected officials and victims of stalking and harassment who have a heightened need for privacy, especially as to their home addresses.
10. During the 2024 general election cycle in Pennsylvania, members of LWVPA faced challenges to their eligibility to vote based on inaccurate or obsolete data about their places of residence.
11. During that same election cycle, LWVPA had to divert staff resources to helping voters respond to such challenges to their eligibility.

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

Executed this 9th day of October, 2025 in Montgomery County, Pennsylvania.

A handwritten signature in blue ink, consisting of a stylized 'A' followed by a long horizontal stroke.

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Amy Widestrom

# EXHIBIT I

## **DECLARATION OF SUZANNE ALMEIDA**

I, Suzanne Almeida, hereby declare as follows:

1. I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2. I am of majority age and am otherwise competent to testify.

3. I am a resident and registered voter in Philadelphia, Pennsylvania.

4. I am Common Cause's Vice President, States. I have worked for Common Cause since July 2018.

5. Common Cause is a nonprofit, nonpartisan membership organization incorporated under the laws of the District of Columbia and registered to do business in Pennsylvania. Pursuant to its bylaws, Common Cause is organized and operated as a membership organization and seeks to intervene in this action in a representative capacity on behalf of its members.

6. Common Cause is a grassroots organization dedicated to empowering all people in Pennsylvania to make their voices heard in the political process. Common Cause's members live across Pennsylvania and include registered Pennsylvania voters. Through its members in Pennsylvania, Common Cause works to create open, honest, and accountable government that serves the public interest—including by protecting voting rights.

7. Pursuant to its bylaws, Common Cause has defined who qualifies as a member. Under its definition, a "member" of Common Cause is any individual who, within the past two years, (a) made a financial contribution to the

organization; or (b) has taken meaningful action in support of Common Cause's advocacy work. Such meaningful action includes, but is not limited to, signing petitions directed to government officials; participating in letter-writing or phone-banking campaigns; attending town halls, workshops, or rallies organized by Common Cause; or otherwise engaging in activities designed to advance the organization's mission.

8. In Pennsylvania, Common Cause has three full-time staff members and approximately 24,000 members.

9. Many of Common Cause's Pennsylvania members are registered voters whose personal information is maintained in the statewide voter registration database held by the Pennsylvania Department of State ("DOS"). If DOS discloses the unredacted voter registration file to DOJ, these members' sensitive personal information—including voter signatures, driver's license numbers, and portions of social security numbers—would be unlawfully released, causing an invasion of privacy, chilling participation in the electoral process, and undermining confidence in the integrity of Pennsylvania's elections.

10. Common Cause represents the interests of its members in this litigation. Common Cause moves to intervene on behalf of its Pennsylvania members, who would have standing to sue individually because they face direct and imminent injury if their personal data is disclosed. Litigating this matter on behalf of its members is germane to Common Cause's mission of protecting



voting rights and election integrity, and the relief requested—dismissal or denial of the claims of the United States—does not require participation of individual members.

11. Common Cause's voting-related work in Pennsylvania includes educating our members and the general public about voter registration; voting by mail and absentee ballots; and voting in person by ordinary and provisional ballots. We have consistently worked to assure voters that Pennsylvania's voter registration system is safe and secure.

12. Common Cause is also a leader of a nonpartisan election protection effort at every major election to protect, advance, and defend the right to vote. As part of this work, we help to organize and administer a hotline that thousands of Pennsylvanians call during every major election cycle. Topics of calls the hotline handles include questions about voter registration and problems with voting by mail. We connect callers with volunteers who help to resolve problems in order to ensure that all voters have an equal opportunity to vote and have that vote count. We will continue this work during next month's general election in Pennsylvania and during the primary and general elections in Pennsylvania in 2026 and beyond.

13. If the federal government succeeds through this lawsuit in obtaining sensitive, private information about Pennsylvania voters, Common Cause will have to redirect staff time and other resources to educating member and the general public about new threats they may face, including baseless challenges

to their eligibility to vote by mail or in person, potential purging of their names from voter rolls, and identity theft risks resulting from improper dissemination of their personal data. We will struggle to balance the need to inform people of these genuine threats while not scaring them away from registering to vote and casting ballots.

14. Common Cause has many members in Pennsylvania who faces risks if the United States obtains the confidential information it seeks through this litigation. Our members have reported concerns to our staff in Pennsylvania about risks including federal usurpation of election administration, manipulation of elections, and disenfranchisement of mail voters.

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

Signed on the 9th day of October, 2025, in Philadelphia County, Pennsylvania

A handwritten signature in cursive script that reads "Suzanne Almeida".

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Suzanne Almeida

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

UNITED STATES OF AMERICA,  Plaintiff,  v.  COMMONWEALTH OF PENNSYLVANIA; and AL SCHMIDT, in his official capacity as Secretary of the State of Pennsylvania,  Defendants.	Case No. 2:25-cv-1481 (Hon. Cathy Bissoon)
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**[PROPOSED] ANSWER**

Intervenor-Defendants Nicholas Maston, Gregory Perry, Todd Thatcher, Joel Dickson, Trisha Kent, Lior Sternfeld, John Thompson, the League of Women Voters of Pennsylvania, and Common Cause, hereby Answer the Complaint filed by Plaintiff, and state as follows:

**INTRODUCTION**

The Complaint begins with two unnumbered paragraphs. No response to these paragraphs is required.

1. Paragraph 1 contains legal arguments to which no response is required. To the extent a response is required, Intervenor-Defendants deny that the NVRA and HAVA require the provision to the federal government of private data about Pennsylvania voters. To the extent the averments in this paragraph purport to summarize the NVRA and HAVA, Intervenor-Defendants refer to the NVRA and HAVA for their full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

2. Paragraph 2 contains legal arguments to which no response is required. To the extent a response is required, Intervenor-Defendants deny that the NVRA and HAVA require the provision to the federal government of private data about Pennsylvania voters. To the extent the averments in this paragraph purport to summarize the NVRA and HAVA, Intervenor-Defendants refer to the NVRA and HAVA for their full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

3. Paragraph 3 contains legal arguments to which no response is required. Admitted that the United States has brought this action. Denied that any of the statutes cited in this paragraph give the United States the authority it asserts. To the extent any further response is required, the remaining allegations are denied.

#### **JURISDICTION AND VENUE**

4. Paragraph 4 contains legal arguments to which no response is required.

5. Admitted.

#### **PARTIES**

6. Paragraph 6 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

7. Admitted that the Commonwealth of Pennsylvania is a state of the United States of America. The remainder of paragraph 7 contains legal arguments to which no response is required. To the extent any further response is required, the remaining allegations are denied.

8. Admitted that Al Schmidt is Pennsylvania's Secretary of the Commonwealth and that he is sued only in his official capacity. The remainder of paragraph 8 contains legal

arguments to which no response is required. To the extent any further response is required, the remaining allegations are denied.

## **STATUTORY BACKGROUND**

### **A. The Civil Rights Act of 1960**

9. Paragraph 9 contains legal arguments to which no response is required. To the extent a response is required, Intervenor-Defendants admit that the Civil Rights Act of 1960 gives the Attorney General certain powers to request records subject to certain requirements and conditions, but deny that it empowers her to do so as claimed in this lawsuit. To the extent any further response is required, the remaining allegations are denied.

10. Paragraph 10 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

11. Paragraph 11 contains legal arguments to which no response is required. Intervenor-Defendants admit that 52 U.S.C. § 20703 begins with the quoted language. Intervenor-Defendants note that § 20703 goes on to say: “This demand shall contain a statement of the basis and the purpose therefor.” To the extent the averments in this paragraph purport to summarize the Civil Rights Act of 1960, Intervenor-Defendants refer to that Act for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

### **B. The National Voter Registration Act**

12. Paragraph 12 contains legal arguments to which no response is required. Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

13. Paragraph 13 contains legal arguments to which no response is required.

Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

14. Paragraph 14 contains legal arguments to which no response is required.

Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

15. Paragraph 15 contains legal arguments to which no response is required.

Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA or legislative history, Intervenor-Defendants refer to the NVRA and the legislative history for their full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

16. Paragraph 16 contains legal arguments to which no response is required.

Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

17. Paragraph 17 contains legal arguments to which no response is required.

Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the

averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

18. Paragraph 18 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

19. Paragraph 19 contains legal arguments to which no response is required. Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

20. Paragraph 20 contains legal arguments to which no response is required. Intervenor-Defendants admit that the NVRA includes the quoted language. To the extent the averments in this paragraph purport to summarize the NVRA, Intervenor-Defendants refer to the NVRA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

### **C. The Help America Vote Act**

21. Paragraph 21 contains legal arguments to which no response is required. Intervenor-Defendants admit that the House Report includes the quoted language. To the extent the averments in this paragraph purport to summarize the House Report, Intervenor-Defendants refer to the House Report for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

22. Paragraph 22 contains legal arguments to which no response is required. Intervenor-Defendants admit that the House Report includes the quoted language. To the

extent the averments in this paragraph purport to summarize the House Report, Intervenor-Defendants refer to the House Report for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

23. Paragraph 23 contains legal arguments to which no response is required. Intervenor-Defendants admit that HAVA includes the quoted language. To the extent the averments in this paragraph purport to summarize HAVA, Intervenor-Defendants refer to HAVA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

24. Paragraph 24 contains legal arguments to which no response is required. Intervenor-Defendants admit that HAVA includes the quoted language. To the extent the averments in this paragraph purport to summarize HAVA, Intervenor-Defendants refer to HAVA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

25. Paragraph 25 contains legal arguments to which no response is required. Intervenor-Defendants admit that HAVA includes the quoted language. To the extent the averments in this paragraph purport to summarize HAVA, Intervenor-Defendants refer to HAVA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

26. Paragraph 26 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

27. Paragraph 27 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.



28. Paragraph 28 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

29. Paragraph 29 contains legal arguments to which no response is required. Intervenor-Defendants admit that HAVA includes the quoted language. To the extent the averments in this paragraph purport to summarize HAVA, Intervenor-Defendants refer to HAVA for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

30. Paragraph 30 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

#### **FACTUAL ALLEGATIONS**

31. Paragraph 31 contains legal arguments to which no response is required. Intervenor-Defendants admit that the EAC's website includes the quoted language. To the extent the averments in this paragraph purport to summarize the EAC's website, Intervenor-Defendants refer to that website for its full and complete contents and deny anything inconsistent therewith. To the extent any further response is required, the remaining allegations are denied.

32. The first sentence of paragraph 32 purports to quote a sentence from <https://www.eac.gov/about>. Intervenor-Defendants deny that this sentence appears on that webpage, and further note that such language does appear on a different EAC webpage, <https://www.eac.gov/research-and-data/studies-and-reports>. Intervenor-Defendants admit that the remainder of paragraph 32 quotes language from the 2024 EAVS Report. To the extent the averments in this paragraph purport to summarize the EAC's website and/or the 2024 EAVS Report, Intervenor-Defendants refer to that website and report for their full and

complete contents and deny anything inconsistent therewith. Intervenor-Defendants otherwise lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 32.

33. Admitted that lawyers from the U.S. Department of Justice sent a letter to Secretary Schmidt on June 23, 2025. Denied that “[t]he Attorney General” sent the June 23 Letter. To the extent the averments in paragraph 33 purport to summarize the June 23 Letter, Intervenor-Defendants refer to the June 23 Letter for its full and complete contents and deny anything inconsistent therewith.

34. Paragraph 34 contains legal arguments to which no response is required. To the extent the averments in this paragraph purport to summarize the June 23 Letter, Intervenor-Defendants refer to the June 23 Letter for its full and complete contents and deny anything inconsistent therewith.

35. The first sentence of paragraph 35 is admitted. The remainder of paragraph 35 purports to summarize the June 23 Letter, Intervenor-Defendants refer to the June 23 Letter for its full and complete contents and deny anything inconsistent therewith.

36. Admitted that lawyers from the U.S. Department of Justice sent a letter to Secretary Schmidt on August 4, 2025. Denied that “[t]he Attorney General” sent the August 4 Letter. To the extent the averments in paragraph 36 purport to summarize the August 4 Letter, Intervenor-Defendants refer to the August 4 Letter for its full and complete contents and deny anything inconsistent therewith.

37. The averments in paragraph 37 purport to summarize the August 4 Letter. Intervenor-Defendants refer to the August 4 Letter for its full and complete contents and deny anything inconsistent therewith.

38. Admitted that “Secretary Schmidt sent a second letter on August 18, 2025.” Denied that the August 18 Letter was responsive to EAVS requests from “the Attorney General.” Admitted that the August 18 Letter contains the language within quotation marks in the second sentence of paragraph 38. To the extent the averments in paragraph 38 purport to summarize the August 18 Letter, Intervenor-Defendants refer to the August 18 Letter for its full and complete contents and deny anything inconsistent therewith. Paragraph 38 also contains legal arguments to which no response is required.

39. Admitted that a lawyer from the U.S. Department of Justice sent a letter to Secretary Schmidt on August 14, 2025. Denied that “[t]he Attorney General” sent the August 14 Letter. To the extent the averments in paragraph 39 purport to summarize the August 14 Letter, Intervenor-Defendants refer to the August 14 Letter for its full and complete contents and deny anything inconsistent therewith. Paragraph 39 also contains legal arguments to which no response is required.

40. Admitted that the quoted language appears in the August 14 letter. Intervenor-Defendants lack knowledge or information sufficient to form a belief about the truth of the quoted language. To the extent any further response is required, Intervenor-Defendants deny the accuracy of the quoted language.

41. Intervenor-Defendants lack knowledge or information sufficient to form a belief about the truth of the allegation made in paragraph 41. To the extent any further response is required, Intervenor-Defendants deny the assertion that voter information collected by the Justice Department will be “maintained consistent with the Privacy Act” and/or other applicable law. Insofar as paragraph 41 contains legal arguments, no response thereto is required.

42. Admitted that the quoted language appears in the August 14 letter. To the extent the averments in paragraph 42 purport to summarize the August 14 Letter, Intervenor-Defendants refer to the August 14 Letter for its full and complete contents and deny anything inconsistent therewith. The quoted language contains legal arguments to which no response is otherwise required.

43. Admitted that Secretary Schmidt sent a letter in response on August 21, 2025. To the extent the averments in paragraph 43 purport to summarize the August 21 Letter, Intervenor-Defendants refer to the August 21 Letter for its full and complete contents and deny anything inconsistent therewith. Intervenor-Defendants lack knowledge or information sufficient to form a belief about the truth of the allegation made in the second sentence of paragraph 43.

44. Admitted that the quoted language appears on ERIC's website. Intervenor-Defendants refer to ERIC's website for its full and complete contents and deny anything inconsistent therewith. Intervenor-Defendants otherwise lack knowledge or information sufficient to form a belief about the truth of the allegation made in paragraph 44

45. Intervenor-Defendants lack knowledge or information sufficient to form a belief about the truth of the allegation made in paragraph 45. Insofar as paragraph 45 contains legal arguments, no response thereto is required.

## **CAUSES OF ACTION**

### **COUNT 1: CIVIL RIGHTS ACT OF 1960, 52 U.S.C. § 20701, et seq.**

46. Intervenor-Defendants restate and incorporate herein the responses in the foregoing paragraphs of this Answer.

47. Paragraph 47 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

48. Paragraph 48 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied. To the extent the averments in paragraph 48 purport to summarize the August 14 Letter, Intervenor-Defendants refer to the August 14 Letter for its full and complete contents and deny anything inconsistent therewith.

49. Paragraph 49 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied. To the extent the averments in paragraph 49 purport to summarize the August 21 Letter, Intervenor-Defendants refer to the August 21 Letter for its full and complete contents and deny anything inconsistent therewith.

50. Paragraph 50 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

51. Paragraph 51 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT II: NATIONAL VOTER REGISTRATION ACT, 52 U.S.C. § 20507(i)**

52. Intervenor-Defendants restate and incorporate herein the responses in the foregoing paragraphs of this Answer.

53. Paragraph 53 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied. To the extent the averments in paragraph 53 purport to summarize the August 4 and 14 Letters, Intervenor-Defendants refer to the Letters for their full and complete contents and deny anything inconsistent therewith.

54. Paragraph 54 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

55. Paragraph 55 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

56. Paragraph 56 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

**COUNT III: HELP AMERICA VOTE ACT, 52 U.S.C. § 21083**

57. Intervenor-Defendants restate and incorporate herein the responses in the foregoing paragraphs of this Answer.

58. Paragraph 58 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

59. Paragraph 59 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

60. Paragraph 60 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

61. Paragraph 61 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

62. Paragraph 62 contains legal arguments to which no response is required. To the extent a response is required, the allegations are denied.

**AFFIRMATIVE DEFENSES**

1. The Complaint fails to state a viable claim for relief.
2. The relief sought is barred by the doctrine of laches.
3. The relief sought is barred by the doctrine of unclean hands.
4. The relief sought is contrary to law.
5. The authority claimed by Plaintiff in the Complaint as grounds for the relief sought is ultra vires.

**PRAYER FOR RELIEF**

WHEREFORE, Intervenor-Defendants deny that the United States is entitled to judgment in its favor on any grounds, and Intervenor-Defendants respectfully request that the relief requested by the United States be denied in its entirety.

Dated: October 9, 2025

Respectfully Submitted,

/s/ Witold J. Walczak

Ari J. Savitzky\*  
Theresa J. Lee\*  
Sophia Lin Lakin\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
Tel.: (212) 549-2500  
asavitzky@aclu.org  
tlee@aclu.org  
slakin@aclu.org

Mary M. McKenzie (PA No. 47434)\*  
Benjamin Geffen (PA No. 310134)\*  
Olivia Mania (PA No. 336161)\*  
PUBLIC INTEREST LAW CENTER  
1500 JFK Blvd., Suite 802  
Philadelphia, PA 19102  
(267) 546-1313  
mmckenzie@pubintl.org  
bgeffen@pubintl.org  
omania@pubintl.org

Witold J. Walczak (PA No. 62976)  
Kate I. Steiker-Ginzberg (PA No. 332236)  
AMERICAN CIVIL LIBERTIES UNION OF  
PENNSYLVANIA  
P.O. Box 60173  
Philadelphia, PA 19102  
(215) 592-1513  
vwalczak@aclupa.org  
ksteiker-ginzberg@aclupa.org

*\* application for admission pro hac vice  
forthcoming*