

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

WILLIAM C. TOTH JR., ET. AL.	:	No. 1:22-cv-00208-JPW
	:	
Plaintiffs	:	
	:	
v.	:	
LEIGH M. CHAPMAN, ET. AL.	:	
	:	
Defendant	:	

DECLARATION OF AARON BASHIR

Under 28 U.S.C. § 1746, I, Aaron Bashir, make this declaration as follows:

1. I am a Philadelphia Republican City Committee endorsed candidate for United States Congress for the Second Congressional District of Pennsylvania.
2. The incumbent in the Second Congressional District is Brendan Boyle, a Democrat.
3. According to registration records, the Second Congressional District has a +44% Democratic voter-registration advantage.¹
4. The Pennsylvania Supreme Court's order of February 23, 2022, inflicts irreparable harm by forcing me to run in a congressional district with a massive Democratic voter-registration advantage, rather than in a statewide at-large election where the number of Democratic and Republican voters are more evenly split.

¹ https://projects.fivethirtyeight.com/redistricting-2022-maps/pennsylvania/preliminary_plan (last visited February 24, 2022)

5. The Pennsylvania Supreme Court's order of February 23, 2022, inflicts additional irreparable harm because the court-drawn map is unconstitutional under the Elections Clause and 2 U.S.C. § 2a(c)(5), and there is a serious risk that a federal court or the Supreme Court of the United States will declare the map unlawful after I have spent time and resources campaigning in the court-drawn congressional district. Preliminary-injunctive relief is needed to remove this uncertainty.

6. The lingering uncertainty over the legality and constitutionality of the court-drawn map inflicts additional irreparable harm by making it difficult to raise money from donors to finance my campaign.

7. Many donors want to know the particulars of a race before committing financial resources to it. Yet it remains unclear whether the court-imposed map will be used for the 2022 elections because the state supreme court's order of February 23, 2022, is patently unconstitutional and is likely to be declared so at the conclusion of this litigation or in other lawsuits or appeals that challenge the legality of the state supreme court's actions.

8. Without financial resources, I cannot finance my campaign and my ability to broadcast my campaign message to voters is greatly diminished as I cannot pay staff, purchase advertising, and print campaign literature.

9. I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Aaron Bashir (Feb 24, 2022 20:47 EST)

AARON BASHIR

Date: Feb 24, 2022

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	:	
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DECLARATION OF ALAN HALL

Under 28 U.S.C. § 1746, I, Alan Hall, make this declaration as follows:

1. I am a member of the Susquehanna County Board of Elections.
2. I oversee the lawful administration of all aspects of elections, including voter registration, the voting process, and tabulation of votes.
3. I also certify the results of all primary and general elections in the county to the Secretary of State.
4. I must ensure that elections are honestly, efficiently, and uniformly conducted.
5. The Uniformed and Overseas Citizens Absentee Voting Act, 52 U.S.C. § 20302(a)(8)(A) requires that my office send ballots to overseas military members at least 45 days before the primary election.
6. This year the deadline is April 2, 2022, which is a Saturday.
7. Under the Pennsylvania Supreme Court’s revised general election calendar, I do not anticipate having a certified list of candidates until March 29, 2022,

which is the deadline for the Pennsylvania Supreme Court imposed on the Pennsylvania Commonwealth Court to resolve all objections to nomination petitions.

8. That means my office would have only 1 or 2 days to prepare and mail overseas military absentee ballots to comply with federal law.

9. As previously stated, Susquehanna County is a small county with limited staff.

10. The Pennsylvania Supreme Court's decision places me at risk of violating federal law thereby inflicting irreparable injury.

11. The Pennsylvania Supreme Court's decision places overseas military members at risk of disenfranchisement because they might not get their ballots timely, thereby inflicting irreparable injury.

12. The Pennsylvania Supreme Court's compression of the General Primary Election calendar threatens my ability to fulfill those obligations arising under federal law, thereby inflicting irreparable injury.

13. I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



[Alan M Hall \(Feb 24, 2022 06:09 EST\)](#)

ALAN HALL

Date: Feb 24, 2022