

Exhibit C

IN THE SUPREME COURT OF PENNSYLVANIA

JACQUELYN CRAMER,

Petitioner,

v.

No.:

KATHY BOOCKVAR, IN HER
CAPACITY AS SECRETARY OF THE
COMMONWEALTH OF
PENNSYLVANIA; AND JESSICA
MATHIS, IN HER CAPACITY AS
DIRECTOR OF THE BUREAU OF
ELECTION SERVICES AND NOTARIES
OF THE PENNSYLVANIA
DEPARTMENT OF STATE,

Respondents.

DECLARATION OF MICHELLE KANTER COHEN

I, Michelle Kanter Cohen, hereby declare and state as follows:

1. I am over the age of 18 and competent to make this declaration.
2. I am an attorney employed by Fair Elections Center, counsel of record for Petitioner Jacquelyn Cramer in the above-captioned matter, and intend to apply for admission pro hac vice.
3. For inclusion in the Petition, I downloaded data from the dataset entitled 2020 Primary Election Mail Ballot Requests Department of State, located at <https://data.pa.gov/Government-Efficiency-Citizen->

Engagement/2020-Primary-Election-Mail-Ballot-Requests-Departm/853w-ecfz.

4. Due to limitations on the number of records that can be manipulated in Excel, I downloaded the data from the Open Data Pennsylvania website in two parts. I downloaded a file containing Philadelphia, Allegheny, Bucks, Montgomery, and Delaware Counties, and another file containing the remainder of the counties. This allowed the use of data filters within Excel.

5. Using the data filters in Excel, I was able to obtain the number of records that met each series of criteria described in the Petition for each set of files. For each conclusion below, the record had to meet all the required criteria to be included in the count.

Conclusion	Excel Filter Criteria
“At least 6,700 voters over the age of 65 whose ballot requests had been approved at least one month in advance.”	<ul style="list-style-type: none">• Ballot mailed date is on or after 5/19/2020• Application approved date is on or before 5/1/2020• Date of birth on or before 6/1/1955

<p>“One week before the election, there were at least 7,000 absentee or mail-in ballots that had not yet been mailed to voters over the age of 65 with approved applications and where those voters ultimately did not have a ballot marked as returned.”</p>	<ul style="list-style-type: none"> • Date of birth on or before 6/1/1955 • Application approved date is on or before 5/26/2020 • Ballot mailed date is blank • Ballot return date is blank <p>[Added to]</p> <ul style="list-style-type: none"> • Date of birth on or before 6/1/1955 • Application approved date is on or before 5/26/20 • Ballot mailed date is after 5/26/2020 • Ballot return date is blank
<p>“[A]t least a thousand voters with approved applications <i>never</i> received their ballots in the mail or otherwise... [where they were] submitted and approved by the May 26 deadline.”</p>	<ul style="list-style-type: none"> • Ballot mailed date is blank • Ballot return date is blank • Application approved date is on or before 5/26/2020

6. I then added together the results for the two files to get the statewide totals.

7. For voters aged 65 and older, I used the criterion of those born on or before 6/1/1955.

8. The numbers I obtained from this method can be replicated currently on the Open Data Pennsylvania website using its filter function. The total number of records meeting the conditions displays at the bottom of

the list of matching records. To use this function, the setting should include that the data must “Match all conditions” to be displayed/counted. The following criteria were used:

Conclusion	Open Data PA Filter Criteria
<p>“At least 6,700 voters over the age of 65 whose ballot requests had been approved at least one month in advance.”</p>	<ul style="list-style-type: none"> ● Ballot mailed date is after 5/18/2020 ● Application approved date is before 5/2/2020 ● Date of birth before 6/2/1955
<p>“One week before the election, there were at least 7,000 absentee or mail-in ballots that had not yet been mailed to voters over the age of 65 with approved applications and where those voters ultimately did not have a ballot marked as returned.”</p>	<ul style="list-style-type: none"> ● Date of birth before 6/2/1955 ● Application approved date is before 5/27/2020 ● Ballot mailed date is blank ● Ballot return date is blank <p>[Added to]</p> <ul style="list-style-type: none"> ● Date of birth before 6/2/1955 ● Application approved date is before 5/27/20 ● Ballot mailed date is after 5/26/2020 ● Ballot return date is blank
<p>“[A]t least a thousand voters with approved applications <i>never</i> received their ballots in the mail or otherwise... [where they were] submitted and approved by the May 26 deadline.”</p>	<ul style="list-style-type: none"> ● Ballot mailed date is blank ● Ballot return date is blank ● Application approved date is before 5/27/2020

Dated: September 2, 2020

A handwritten signature in black ink, appearing to read "Michelle E. Kanter Cohen". The signature is fluid and cursive, with the first name "Michelle" being the most prominent.

Michelle E. Kanter Cohen
1825 K Street NW, Suite 450
Washington, DC 20006
Telephone: 202-331-0114

*Attorney for Petitioner
Jacquelyn Cramer*