

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

JUDICIAL WATCH, INC.,

Plaintiff,

v.

COMMONWEALTH OF
PENNSYLVANIA, *et al.*,

Defendants.

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No. 1:20-CV-0708

(JUDGE CONNER)

DEFENDANTS LUZERNE COUNTY COUNCIL, TIM MCGINLEY
AND SHELBY WATCHILLA’S APPENDIX IN SUPPORT OF THEIR
REPLY BRIEF

Respectfully submitted,

/s/John G. Dean

John G. Dean

ELLIOTT GREENLEAF, P.C.

15 Public Square, Suite 310

Wilkes-Barre, PA 18701

(570) 371-5290

*Attorney for Defendants Luzerne County
Council, Tim McGinley, and Shelby
Watchilla*

DATED: April 11, 2022

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Exhibit “1”

Romilda Crocamo’s Affidavit

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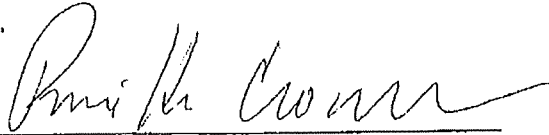
(JUDGE CONNER)

AFFIDAVIT OF LUZERNE COUNTY'S ACTING COUNTY MANAGER, ROMILDA
CROCAMO

I, Romilda Crocamo, upon being duly sworn, state that the factual statements made herein are true and accurate:

1. I have served as Acting County Manager since July 2021.
2. Prior to holding my position as Acting County Manager, I served as the Chief County Solicitor.
3. I have personal knowledge of the facts stated herein.
4. In response to the notice-of-violation issued by Judicial Watch, Inc. ("Judicial Watch"), Luzerne County removed over 17,000 registered voters from its voting polls on or about June 1, 2021, in order to comply with the requirements, set forth by the National Registered Voter's Act ("NRVA").

5. I personally attest to the accuracy of the Times Leader Article¹ Judicial Watch had cited in its complaint, and verify that Luzerne County did in fact remedy the violations after receiving notice and threat of litigation.


Romilda Crocamo

Dated: April 11, 2022

¹ <https://www.timesleader.com/news/1497069/luzerne-county-drops-17420-voters> (Last visited April, 11 2022).