

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

**ROBERT HAGOPIAN,**  
16 Hagopian Ct.  
Madison, ME 04950

**DUANE R. LANDER,**  
P.O. Box 1113  
Greenville, ME 04441

**STERLING B. ROBINSON, and**  
1330 Atlantic Highway  
Warren, ME 04864

**JAMES T. TRUDEL,**  
616 Fuller Rd.  
Hermon, ME 04401

**Plaintiffs,**

v.

Case No. \_\_\_\_\_

**MATTHEW DUNLAP, in his official capacity as**  
Secretary of State of Maine,  
148 State House Station  
Augusta, Maine 04333-0148

**AARON FREY, in his official capacity as**  
Attorney General of Maine,  
6 State House Station  
Augusta, ME 04333

**JANET MILLS, in her official capacity as**  
Governor of Maine,  
#1 State House Station  
Augusta, ME 04333

**Defendants.**

**DECLARATION OF STERLING B. ROBINSON IN SUPPORT OF PLAINTIFFS'**  
**COMPLAINT AND MOTION FOR A PRELIMINARY INJUNCTION**

I, Sterling Robinson, hereby declare as follows under the penalty of perjury.

1. The following statements are based on my personal knowledge, and if called to testify I could swear competently thereto.

2. I am 72 years old and of sound mind.

3. I am a citizen of the United States and of the State of Maine.

4. I reside at 1330 Atlantic Highway, Warren, ME 04864 in Knox county.

5. I am an eighth-generation Maine resident, and I currently reside in a home built by my family, which is one of the only remaining original homes that was built on the Waldo Patent land grant.

6. I am retired, but I was previously employed in a number of different positions, including as a tractor trailer driver and an office manager and personal assistant to a listed artist.

7. I attended several years of post-secondary education at the University of Maine in 1967 to 1968. I participated in the Continuing Education Division and did not receive an undergraduate degree.

8. I am an eligible Maine voter and am duly registered as a Republican to vote in Maine's federal elections.

9. I voted in the 2018 election for Maine's Second Congressional Election ("2018 Congressional Election").

10. In the 2018 Congressional Election, I cast my ballot for Bruce Poliquin in the first round, but I did not fill out a vote for the remaining rounds of voting.

11. I completed my ballot in this manner, because after researching the ranked-choice voting options, I was under the mistaken impression that it was not necessary to fill out additional rounds of the ballot to ensure that my ballot would not be exhausted.

12. I was confused regarding the actions necessary to ensure that my vote was counted in each round of ranked-choice voting.

13. I did not understand the significance of ranking other candidates on the ballot in the 2018 Congressional Election. In particular, I did not understand that the failure to rank additional candidates risked having my ballot exhausted.

14. Had I understood the significance of ranking other candidates, I would have done so in the 2018 Congressional Election.

15. I plan to vote in Maine's 2020 Senate election ("2020 Senatorial Election").

16. In the 2020 Senatorial Election, I will be voting for Susan Collins as in the first round, but I intend to rank the other Senate candidates in the remaining rounds to ensure that my ballot is fully counted.

17. My goal is ultimately to ensure that my vote is counted.

18. However, I still do not understand how to rank the candidates to both ensure that my preferred candidate is in the best position to win while ensuring that my ballot will not be exhausted.

19. I do not know where or how to research strategic ranked-choice voting, and I am concerned that in attempting to ensure my ballot is counted, I could unknowingly undermine my voting interests.

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

/s/ Sterling B. Robinson  
Sterling B. Robinson

July 22, 2020  
Date