

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA DEMOCRATIC
PARTY,

Plaintiff,

v.

REPUBLICAN PARTY OF
PENNSYLVANIA, DONALD J.
TRUMP FOR PRESIDENT, INC.,
ROGER J. STONE, JR., and STOP
THE STEAL, INC.,

Defendants.

Civil Action No. 2:16-cv-5664-PD

FILED
NOV - 7 2016
LUCY V. CHIN, Interim Clerk
By _____ Dep. Clerk

**DECLARATION OF DEFENDANT ROGER J. STONE IN SUPPORT OF
DEFENDANTS ROGER J. STONE AND STOP THE STEAL'S
OPPOSITION TO MOTION FOR TEMPORARY RESTRAINING ORDER
AND/OR PRELIMINARY INJUNCTION**

1. I am a resident of the State of Florida, and am a defendant in this action. I have never in the past had, and today, do not have, any business in the State of Pennsylvania. My only connection to Pennsylvania has been as a tourist and occasional visitor.
2. I am not employed by Stop the Steal nor am I an officer of it. I do happen to be a volunteer for it, as are many other people. In no sense do I run Stop the Steal, but I do assist in managing one of its projects. I did not establish Stop the Steal. I do not control its bank account or in any other way manage its affairs.
3. I have never given my attorney authority to accept service of process for me.
4. I have not been served with process in this case.
5. With regard to the exit polling Stop the Steal will be conducting on election day next week, I have no intention whatsoever of violating any law or regulation, nor do I have any intention of targeting minority-majority precincts or of contacting individual voters based on their race or color. Indeed, it is my intention that all voters in a given precinct, or at least as many as possible, be contacted. However, since our election day effort is national, the amount of volunteers in any one state, including Nevada, will be minimal.
6. The following statement is about to be published on Stop the Steal's website, and it will be emailed Monday to every volunteer nationwide:

You must not:

- a. Speak (or encourage anyone else to speak)to any voter before he goes into a polling place, about ANYTHING, or who appears to be in line to vote or headed into a polling place.
 - b. Speak to ANYONE within 100 feet of the entrance to any polling place
 - c. Go inside a polling location for any reason other than to vote yourself, and when voting yourself and inside a polling place say or do anything not directly related to casting your own vote
 - d. Record by audio or video or any other method of sound or video reproduction the comments of anyone who has voted without that person's permission
 - e. Wear or display any badge, button, or clothing that promotes any political candidate or party
 - f. Photograph the conduct of voting at a polling place or record the conduct of voting, or of any voter in line to vote (no matter how far distant from a polling place) or who appears to be headed into a polling place to vote or who is within 100 feet of a polling place even if that person has already voted
 - g. Without regard to distance from a polling place, ask any person *who has not yet voted* their name, address or political affiliation or how that voter plans to mark his or her ballot
 - h. It is our goal to conduct a neutral, scientifically-based and methodically sound exit poll at certain targeted precincts for the purpose of preparing the exit poll actual
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7. A conference call will be offered to all volunteers in order to reiterate these rules to them on Monday evening. Volunteers are being asked to ask people who have voted if they will be willing to participate in a simple, voluntary 3-question poll: "Did you just vote; did you vote four years ago; and for whom did you vote today". The answers are then to be tabulated or otherwise recorded and then turned in to Stop the Steal. They are not asked their name or any personal identification, only these three questions and these three questions only.
 8. We have 65 volunteers currently registered in Nevada, dispersed

throughout the state. However, from my experience I do not to expect more than 20% to actually end up working for us on election day. Generally speaking, we want them to focus on Clark County, but I cannot be more specific than that because volunteers can't be depended on to travel any great distance no matter how much I might like them to. In essence, they will be choosing where they will go.

9. The purpose of our election day effort is to conduct a neutral, scientifically valid, methodologically sound exit poll in certain targeted precincts in order to compare the exit poll results with the actual computerized voting machine results as reported. We are seeking to determine what, if any, deviation there is between the actual vote and the exit poll vote and whether there is a pattern between all of those polling places targeted. We seek to determine if the 2016 Presidential election meeting that standard.
10. Our volunteers are not just Republicans but include supporters of Gov. Gary Johnson, Dr. Jill Stein and Senator Bernie Sanders. Our volunteers include members of the Republican, Democratic, Libertarian and Green parties. We only seek to determine if we have had a honest election. Volunteers are asked to sign a sworn statement that they will obey and all state laws pertaining to polling places and election day activities We are interesting in engaging with voters only after they have voted and even then on a voluntary basis.
11. Any unduly obvious display of partisanship would skew poll results and thus be harmful to the goal of conducting accurate poll of voters.
12. I am absolutely, positively not going to engage in any election day avtivites apart from those of Stop the Steal, either in Nevada or anywhere else.
13. The complaint and moving papers filed in this action are full of invective and innuendo by way of making a personal attack on me. That is their right, but their conclusions are simply false. I will under no circumstances be part of any effort, now or at any time in the future to violate the civil rights of any voter. I will not target voters based on their race. I have had no coordination with the state Republican Party defendant in this action, or with the Trump

campaign with regard to exit polling or election day activities, and any suggestion by the plaintiffs to the contrary is rank speculation. Any unduly partisan conduct within the conduct of the survey would negate its value of the result.

I hereby declare under penalty of perjury of the laws of the United States, and of New York, that the foregoing is true and correct of my own personal knowledge and that if called upon, I would and could so competently testify.

Executed at New York, New York on November 6, 2016


/s/



ROGER J. STONE

Dated November 6, 2016

Respectfully submitted,



PAUL ROLF JENSEN,
*Application for admission pro hac
vice to be filed immediately*
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