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Attorney of Record for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Arizona Democratic Party,
Plaintiff,

v.

Arizona Republican Party, Donald J. Trump
for President, Inc., Roger J. Stone, Jr., and
Stop the Steal, Inc.,
Defendants.

No. CV-16-03752-PHX-JJT

**DECLARATION OF
SARAH R. GONSKI IN SUPPORT
OF PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER AND/OR PRELIMINARY
INJUNCTION**

I, SARAH R. GONSKI, declare as follows:

1. I am an attorney with the law firm of Perkins Coie LLP, and am counsel for Plaintiff the Arizona Democratic Party. I have personal knowledge of the matters set forth below and can competently testify to their truth.

2. Attached hereto as Exhibit 1 is a true and correct copy of the GOP Press Release (*RNC & Trump Campaign Announce Joint Agreements*) dated May 17, 2016.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Arizona Daily Star article (*Arizona Republicans Train Poll Workers to Document 'Ballot Harvesting'*) dated August 25, 2016.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Volunteer to be a Trump Election Observer form.

1 5. Attached hereto as Exhibit 4 is a true and correct copy of the Guardian
2 article (*Trump Loyalists Plan Own Exit Poll Amid Claims of 'Rigged' Election*) dated
3 October 20, 2016.

4 6. Attached hereto as Exhibit 5 is a true and correct copy of the Stop the Steal
5 website home page accessed October 22, 2016.

6 7. Attached hereto as Exhibit 6 is a true and correct copy of the Boston Globe
7 article (*Warnings of Conspiracy Stoke Anger Among Trump Faithful*) dated October 15,
8 2016.

9 8. Attached hereto as Exhibit 7 is a true and correct copy of @jackbgoodel's
10 tweet on August 19, 2016 at 7:43 P.M.

11 9. Attached hereto as Exhibit 8 is a true and correct copy of the Arizona
12 Republic article (*Roberts: Arizona GOP Chief Explains Why He's Supporting Trump*)
13 dated October 11, 2016.

14 10. Attached hereto as Exhibit 9 is a true and correct copy of the Talking Points
15 Memo article (*Why the RNC Wants Nothing to Do with Trump's Poll Watcher Call to*
16 *Arms*) dated October 21, 2016.

17 11. Attached hereto as Exhibit 10 is a true and correct copy of the Hill article
18 (*Trump Campaign Encouraging Surrogates To Double Down On Ballot Fraud*) dated
19 October 21, 2016.

20 12. Attached hereto as Exhibit 11 is a true and correct copy of the Washington
21 Post article (*Trump Fires up Recruitment of Poll Watchers as He Warns of Election*
22 *'Cheating'*) dated August 13, 2016.

23 13. Attached hereto as Exhibit 12 is a true and correct copy of the State Press
24 article (*Trump Criticizes Obamacare and Clinton Email Scandal at Phoenix Rally*) dated
25 October 29, 2016.

26 14. Attached hereto as Exhibit 13 is a true and correct copy of the Temporary
27 Restraining Order issued by the court in *Daschle v. Thune*, No. 04-cv-4177 (D.S.D. Nov.
28 2, 2004).

1 15. Attached hereto as Exhibit 14 is a true and correct copy of the Complaint
2 filed in *Daschle v. Thune*, No. 04-cv-4177 (D.S.D. Nov. 1, 2004).

3 16. Attached hereto as Exhibit 15 is a true and correct copy of the Order
4 Granting Plaintiffs' Motion for Preliminary Injunction in *Brakebill v. Jaeger*, No. 16-cv-
5 00008 (DLH), (D.N.D. Aug. 1, 2016).

6 17. Attached hereto as Exhibit 16 is a true and correct copy of the Washington
7 Post article (*A Comprehensive Investigation of Voter Impersonation Finds 31 Credible*
8 *Incidents Out of One Billion Ballots Cast*) dated August 6, 2014.

9 18. Attached hereto as Exhibit 17 is a true and correct copy of the Bloomberg
10 Businessweek article (*Inside the Trump Bunker, with Days to Go*) dated October 27, 2016.

11 19. Attached hereto as Exhibit 18 is a true and correct copy of the Politico
12 article (*Trump: Without ID Law, Voters Will Vote '15 Times' for Clinton*) dated August 9,
13 2016.

14 20. Attached hereto as Exhibit 19 is a true and correct copy of the Politico
15 article (*How Hostile Poll-Watchers Could Hand Pennsylvania to Trump*) dated October 2,
16 2016.

17 21. Attached hereto as Exhibit 20 is a true and correct copy of the Atlantic
18 article (*Donald Trump's Attacks on the Rights of Minority Voters*) dated October 13,
19 2016.

20 22. Attached hereto as Exhibit 21 is a true and correct copy of the Boston Globe
21 article (*Giuliani, Gingrich Raise Specter of Voter Fraud Ahead of Election*) dated October
22 16, 2016.

23 23. Attached hereto as Exhibit 22 is a true and correct copy of the Hill article
24 (*Trump: Government Bringing in Illegal Immigrants to Vote*) dated October 7, 2016.

25 24. Attached hereto as Exhibit 23 is a true and correct copy of the Huffington
26 Post article (*Trump-Linked Voter Intimidation Group Releases New Script for 'Citizen*
27 *Journalists'*) dated October 26, 2016).
28

1 25. Attached hereto as Exhibit 24 is a true and correct copy of the New Yorker
2 article (*The Dirty Trickster*) dated June 2, 2008.

3 26. Attached hereto as Exhibit 25 is a true and correct copy of Twitter user
4 @roycan79's tweet on October 17, 2016 at 9:53 a.m.

5 27. Attached hereto as Exhibit 26 is a true and correct copy of the Breitbart
6 article (*Wikileaks: John Podesta Believed 'Obama Forces' Committed Voter Fraud*) dated
7 October 15, 2016.

8 28. Attached hereto as Exhibit 27 is a true and correct copy of the
9 StopTheSteal.org "Voter Protector Exit Poller" registration form.

10 29. Attached hereto as Exhibit 28 is a true and correct copy of the Washington
11 Post article (*Poll: Nearly Half of Americans Say Voter Fraud Occurs Often*) dated
12 September 15, 2016.

13 30. Attached hereto as Exhibit 29 is a true and correct copy of the KJZZ article
14 (*Arizona GOP Training Poll Watchers To Spot Ballot Harvesting*) dated August 26, 2016.
15

16 I hereby certify that the foregoing statements made by me are true to the best of my
17 knowledge and belief. I am aware that if any of the foregoing statements made by me are
18 willfully false, I am subject to punishment.
19

20 DATED: November 1, 2016

By: s/ Sarah R. Gonski

Sarah R. Gonski

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing.

s/ Sarah R. Gonski