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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA STATE DEMOCRATIC PARTY,

Plaintiff,

Case No.:

2:16-cv-02514-RFB-NJK

vs.

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

Defendants.

DECLARATION OF CHARLES MUNOZ

- I, Charles Munoz, declare as follows:
- 1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.
- 2. I hold a bachelor's degree in History from the University of Nevada-Las Vegas. I have worked in politics for six years, and I have worked for Donald J. Trump for President, Inc.

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(the "Campaign") since August 2015. I currently serve as the Nevada State Director for the Campaign and, as such, I am responsible for overseeing the Campaign's "ground game" throughout the State of Nevada including door knocking, GOTV activities, and the poll watcher program. I supervise Jesse Law's activities as the Nevada EDO Director and I work with him on a daily basis to ensure the successful implementation of the Nevada poll watcher program.

- I have personally participated in and observed three poll watcher training sessions 3. in Nevada. In all three sessions in which I was involved, the materials attached to Jesse Law's declaration filed in this court on November 2, 2016 served as the training materials and the trainer expressly discussed the issues and risks related to voter challenges.
- On a number of occasions, I observed poll watcher trainees advocate for a more 4. aggressive approach to poll watching. In each instance, the Campaign's poll watcher trainer properly instructed the trainee as to the proper procedures and insisted that the Campaign's poll watchers follow the procedures outlined in the training materials and discussed during the training session.
- 5. I specifically recall at least one instance in which a poll watcher trainee stated that the Campaign should be more active in confronting and challenging voters' qualifications. The instructor disagreed and, after some discussion, the trainee left the training session rather than accept the Campaign's policy. The trainee therefore did not complete the Campaign's poll watcher training and will not be assigned by the Campaign to any polling place.
- Because of my role in the Campaign, I would very likely be aware of any 6. coordination between the Trump campaign and Roger Stone or Stop the Steal in Nevada, if there were any such coordination. I am unaware of any such coordination.
- Because of my role in the Campaign, I would very likely be aware of any 7. coordination between the Trump campaign and the Republican National Committee or the Nevada Republican Party in connection with the Nevada poll watching program, if there were any such coordination. I am unaware of any such coordination.

Case 2:16-cv-02514-RFB-NJK Document 3	34 Filed 11/03/16 Page 3 of 3	
8. Pursuant to NRS § 53.045, I dec	clare under penalty of perjury under the laws of	
the State of Nevada that the foregoing is true and correct.		
Dated this <u>3</u> day of November, 2016.		
	1) <u> </u>	
	Charles Munoz	