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13 Attorneys Specially appearing¹ for Roger J. Stone and Stop the Steal,
14 erroneously sued as Stop the Steal, Inc.

15 **United States District Court**
16 **District of Nevada**

17 Nevada Democratic Party,
18 Plaintiff,
19 vs.
20 Nevada Republican Party, et al.
21 Defendants.

No. 2:16-cv-02514-RFB-NJK

DECLARATION OF TRAVIS IRVINE
IN OPPOSITION TO MOTION FOR
INJUNCTIVE RELIEF

[filed concurrently with Declarations of
Paul Rolf Jensen, Roger J. Stone and
Memorandum of Law]

22
23 I, TRAVIS IRVINE, hereby declare as follows:
24
25

26 ¹The Court has graciously allowed Defendants Stone and Stop the Steal, through counsel, to file
27 this brief without waiving their jurisdictional claims and without making a general appearance.
28

1 My name is Travis Irvine. I am a registered Democrat. I supported Bernie Sanders for president in
2 the primaries, and I currently support Gary Johnson. I have volunteered to serve as training
3 coordinator for Stop the Steal's exit polling operation. To that end, I have caused the following
4 statement to be published on Stop the Steal's website, and to be emailed to every volunteer
5 nationwide:

6
7 You must not:

- 8 a. Speak (or encourage anyone else to speak)to any voter before he goes into a polling
9 place, about ANYTHING, or who appears to be in line to vote or headed into a
10 polling place.
- 11 b. Speak to ANYONE within 100 feet of the entrance to any polling place
- 12 c. Go inside a polling location for any reason other than to vote yourself, and when
13 voting yourself and inside a polling place say or do anything not directly related to
14 casting your own vote
- 15 d. Record by audio or video or any other method of sound or video reproduction the
16 comments of anyone who has voted without that person's permission
- 17 e. Wear or display any badge, button, or clothing that promotes any political candidate
18 or party
- 19 f. Photograph the conduct of voting at a polling place or record the conduct of voting, or
20 of any voter in line to vote (no matter how far distant from a polling place) or who
21 appears to be headed into a polling place to vote or who is within 100 feet of a polling
22 place even if that person has already voted
- 23 g. Without regard to distance from a polling place, ask any person *who has not yet voted*
24 their name, address or political affiliation or how that voter plans to mark his or her
25 ballot
- 26 h. It is our goal to conduct a neutral, scientifically-based and methodically sound exit
27 poll at certain targeted precincts for the purpose of preparing the exit poll actual
28

21 All volunteers are being emailed and invited to participate Monday evening in a conference
22 call so I can reiterate the above to them orally.

24 Volunteers are being asked to ask people who have voted if they will be willing to participate
25 in a simple, voluntary 3-question poll:" Did you just vote; did you vote four years ago; and
26 for whom did you vote today". The answers are then to be tabulated or otherwise recorded
27
28

1 and then turned to Stop the Steal. They are not asked their name or any personal
2 identification, only these three questions and these three questions only.

3
4 We have 65 volunteers currently registered in Nevada, dispersed throughout the state.
5 However, from my experience I do not to expect more than 20% to actually end up working
6 for us on election day. Generally speaking, we want them to focus on Clark County, but I
7 cannot be more specific than that because volunteers can't be depended on to travel any great
8 distance no matter how much I might like them to. In essence, they will be choosing where
9 they will go.
10

11
12 The purpose of our election day effort is to conduct a neutral, scientifically valid,
13 methodologically sound exit poll in certain targeted precincts in order to compare the exit
14 poll results with the actual computerized voting machine results as reported. We are seeking
15 to determine what, if any, deviation there is between the actual vote and the exit poll vote and
16 whether there is a pattern between all of those polling places targeted. We seek to determine
17 if the 2016 Presidential election meeting that standard.
18

19
20 Our volunteers are not just Republicans but include supporters of Gov. Gary Johnson, Dr. Jill
21 Stein and Senator Bernie Sanders. Our volunteers include members of the Republican,
22 Democratic, Libertarian and Green parties. We only seek to determine if we have had a
23 honest election. Volunteers are asked to sign a sworn statement that they will obey and all
24 state laws pertaining to polling places and election day activities We are interesting in
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1 engaging with voters only after they have voted and even then on a voluntary basis.

2
3
4 Any unduly obvious display of partisanship would skew poll results and thus be harmful to
5 the goal of conducting accurate poll of voters.

6
7 I hereby declare under penalty of perjury of the laws of the United States, and of California,
8 that the foregoing is true and correct of my own personal knowledge and that if called upon, I
9 would and could so competently testify.
10

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12 Executed at San Diego, California on November 5, 2016
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15
16 /s/
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18 _____
19 TRAVIS IRVINE
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