

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL COMMITTEE,
et al.

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE,
et al.

Defendants.

Civil Action No.: 81-3876 (JMV)(JBC)

**DECLARATION OF
MICHAEL LIEBERMAN, ESQ.**

Pursuant to 28 U.S.C. § 1746, I, Michael Lieberman, declare as follows:

1. My name is Michael Lieberman. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a U.S. Citizen, and a resident of San Francisco, California, where I serve as a judge pro tem on San Francisco's Superior Court. I have been a practicing attorney since 1985 and also have my own private civil litigation practice. I am also barred in Nevada.

3. On October 28, 2016, I served as a poll observer at the Arroyo Market Square early voting location on S. Rainbow Boulevard in Las Vegas, Nevada, on behalf of the Nevada State Democratic Party. Early voting at Arroyo Market Square takes place in a small trailer where there is limited space. Because of these space constraints, only two observers are allowed in the trailer at one time, generally one observer per political party. The observers sit next to each other in chairs designated for use by observers.

4. While serving as an observer at Arroyo Market Square, I met another observer named Kishanna Holland. When I first introduced myself to Ms. Holland, she told me that she

was serving as an Independent poll observer. As we talked throughout the day, it became apparent to me that she was more conservative leaning than I had first anticipated, which prompted me to ask if she was truly an Independent or Republican. At that point, Ms. Holland told me that she was Republican and that she was actually working as a poll observer for the Republican National Committee (“RNC”), not as an Independent. She told me that she had only introduced herself as an Independent because “we got a memo that we’re supposed to lie about who we are with.”

5. On October 30, 2016, while serving as a poll observer at another early voting location in Clark County, Nevada—Sun City Anthem Center—I met another poll observer, Joanne, who also identified herself as being an observer for the RNC.

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

Dated: October 31, 2016

Respectfully submitted,



Michael Lieberman