

Exhibit K

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

Judge John Michael Vazquez

DECLARATION OF RONNA ROMNEY MCDANIEL

Pursuant to 28 U.S.C. § 1746, I, Ronna Romney McDaniel, declare as follows:

1. My name is Ronna Romney McDaniel. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth. I am not obligated to provide this declaration, and I am not providing this declaration as an agent, servant, or employee of the RNC.
2. I am a U.S. citizen, the Chairman of the Republican Party of Michigan ("Michigan GOP"), and, by virtue of that position, under Rules 1(a) and 3(b) of the Republican National Committee ("RNC"), am also a member of the RNC. I have served as Chairman of the Michigan GOP since February 2015.
3. Although the Michigan GOP is engaged in poll watching and ballot security activities for this election, all funding for those activities is from the Michigan GOP's own accounts. Furthermore, the materials used in connection with poll watching and ballot security activities in Michigan make it clear to the reader that they are paid for by the Michigan GOP. All training of volunteers for poll

watching and ballot security activities in Michigan is also conducted by Michigan GOP employees and volunteers, and that training is provided only in facilities leased or operated by the Michigan GOP. No RNC employees are involved in recruiting and training volunteers for such activities. Moreover, no training or meetings occur in facilities leased to or operated by the RNC. Except for communications related directly to this declaration, the Michigan GOP has had no communications with the RNC about the Michigan GOP's poll watching and ballot security activities.

4. On October 19, 2016, I received an email from RNC General Counsel John Ryder reminding RNC members of the Consent Decree and that RNC members are not agents of the RNC for ballot security efforts. A true and correct copy of RNC General Counsel John Ryder's October 19, 2016 email is attached as Exhibit A. I reviewed this email and understand that the Consent Decree bars RNC members acting in their capacity as RNC members from engaging in ballot security activity, which includes, but is not limited to, efforts to prevent or remedy vote fraud. I also understand that the RNC does not participate in any ballot security activities. Accordingly, RNC members are not "agents" of the RNC for purposes of ballot security endeavors.

5. On October 19, 2016, I was quoted in a newspaper article regarding ballot security activities of the Michigan GOP. A true and correct copy of the Detroit News article (*Michigan GOP on Guard Against 'Massive' Voter Fraud*) dated October 19, 2016 is attached as Exhibit B. As the article itself notes, I made the

November 2, 2016
Page 3 of 3

comments referred to in this article in my role as Chairman of the Michigan GOP; I did not make the comments on behalf of the RNC or in my capacity as a member of the RNC. In fact, the RNC has not supplied any funding for or had any involvement with ballot security activities in Michigan.

6. It is my understanding that the Michigan GOP conducts poll watching and ballot security activities in every state and federal election, always without the participation or assistance of the RNC.

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

Executed on November 2, 2016.

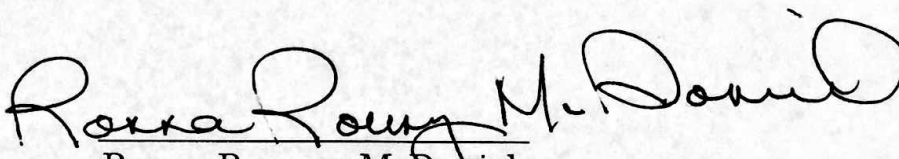

Ronna Romney McDaniel

Exhibit A

Tabas, Lawrence

From: John Ryder - General Counsel <JRyder@gop.com>
Sent: Wednesday, October 19, 2016 4:07 PM
To: John Ryder - General Counsel
Cc: RNC Counsel
Subject: Important Message from John Ryder, General Counsel

RNC Members,

Please take a few minutes to read this important information. With early and absentee voting under way and Election Day approaching, I wanted to remind you of the restrictions placed on the RNC by the consent decree in the case *Democratic National Committee v. Republican National Committee*.

The Consent Decree prohibits the RNC – or anyone acting on the RNC's behalf – from engaging in “ballot security” activity, which includes, but is not limited to, efforts to prevent or remedy vote fraud, unless advance notice is given to the DNC and the U.S. District Court that enforces the Consent Decree grants permission.

The effect is that **no RNC employees or RNC members acting in their capacity as members may engage in any way** with certain Election Day and pre-Election Day activities. Examples of things you are prohibited from doing in your role as an RNC member include:

- Preparing challenge lists
- Poll watching
- Recruiting or training poll watchers
- Making contact with voters at the polls
- Taking pictures or recording video at poll sites
- Informing potential voters that vote fraud is a crime
- Assisting, training or advising others who are participating in any of these activities
- Recruiting others to participate any of these activities

The prohibition on the RNC's involvement in these activities also means that no RNC resources may be used for these activities, and that you may not use your RNC title, letterhead, business cards, or other indicia of RNC membership in connection with these activities.

If the RNC is found to violate the Consent Decree, its provisions will extend for another eight years. Currently, it is set to expire in December 17, and I ask your full cooperation in making sure that it is not extended.

Given the seriousness of the Consent Decree and the severe consequences of a violation, you are encouraged not to engage in “ballot security” activities even in your personal, state party, or campaign capacity. If you elect to do so, please be aware that the RNC in no way sanctions your activity. You are not an agent of the RNC for any such purpose.

Adherence to the Consent Decree is of the utmost importance. If you have questions, please do not hesitate to ask.

Best regards,

John Ryder

General Counsel

Exhibit B

Michigan GOP on guard against 'massive' voter fraud

Jonathan Oosting and Chad Livengood, 5:59 p.m. EDT October 19, 2016



(Photo: George Frey / Getty Images)

Lansing — The Michigan Republican Party is planning to dispatch more than 100 attorneys to polling locations across the state on Election Day to “catch and discourage instances of voter fraud” as GOP presidential nominee Donald Trump has warned the voting process is “rigged.”

Michigan Republican Party Chairwoman Ronna Romney McDaniel said in a recent fundraising letter that she has instructed party attorneys “to prepare a massive statewide anti-voter fraud effort to go along with our last-minute get-out-the-vote (GOTV) efforts.”

“I won’t let Hillary Clinton steal this election from Donald Trump,” McDaniel wrote in the Oct. 10 fundraising plea.

McDaniel said she was trying to raise \$48,000 to pay for canvassing, phone calls to voters and “placing over 100 Michigan Republican Party attorneys in the field to catch and discourage instances of voter fraud.”

Steven Ostrow, executive director of the state Republican Party, said lawyers are stationed in polling precincts for each election to be on hand in case there are challenges over a voter’s identity.

“That’s nothing new,” Ostrow said Wednesday. “That’s what we do every year.”

But Trump has raised the specter of Clinton and the Democrats orchestrating widespread fraud at the ballot box — a controversial claim independent fact checkers have called false but Trump’s Michigan campaign director defended on Wednesday.

The New York businessman has raised an important question about ballot integrity, Scott Hagerstrom said during a “Capitol Morning Brew” forum with Michigan Democratic Party Chairman Brandon Dillon, who called Trump’s accusations “absurd” and “dangerous.”

Hagerstrom pointed to reports that voter registration systems in Illinois and Arizona have been the subject of recent hacks, although he acknowledged the evidence suggests “actual manipulation of data has not occurred.”

“We know right here in Michigan that audits aren’t being done in the system,” Hagerstrom said, referencing a Detroit News article quoting cyber-security experts who recommended [routine audits \(/story/news/politics/2016/10/17/experts-state-audit-election-results/92227308/\)](/story/news/politics/2016/10/17/experts-state-audit-election-results/92227308/) of paper ballots to protect against fraud.

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“Even though systems here are not directly connected to the internet, there is a computer in each and every voting unit throughout the state,” Hagerstrom said. “...There is some concern this should be done.”

Trump’s claim of “large-scale voter fraud happening on and before election day” has been disputed by election officials and leaders from both political parties, including former GOP primary rival and Florida U.S. Sen. Marco Rubio.

Trump's national campaign manager, Kellyanne Conway, said Wednesday there is a "larger conspiracy" working against Trump but does not think there will be widespread voter fraud on Election Day.

"No, I do not believe that," Conway said on MSNBC (<http://www.msnbc.com/stephanie-ruhle/watch/clinton-s-not-an-american-success-story-789083203710>). "So absent overwhelming evidence that there is, it would not be for me to say that there is."

Michigan Secretary of State Ruth Johnson, a Republican, said Monday she has "full confidence" (</story/news/politics/2016/10/17/michigan-election-integrity-rigged-trump/92320860/>) in the state's decentralized election system, which is conducted by 1,603 municipal clerks in cities, villages and townships using paper ballots that are scanned into a machine.

"In Michigan, we have the checks and balances to make sure that the elections will be done properly, with integrity," Johnson told The News.

Some of Trump's distrust of the election process is centered in other states with electronic voting machines that might be vulnerable to cyber attacks. Michigan uses paper ballots that are fed into scanning machines not connected to the internet.

"We're not worried about the same large scale thing that our nominee is talking about," said Sarah Anderson, communications director of the Michigan GOP. "We don't have the same concerns that they do in other states with that kind of wide-scale voter fraud."

Michigan Republicans have faith in Johnson and municipal clerks that the election will be "run very fairly," Ostrow said.

"But we also need to make sure that we cover our bases," Ostrow said.

Both parties station volunteers at polling precincts to monitor voting.

"They don't interact with voters, there's no intimidation," Anderson said.

At the election forum in Lansing, Dillon called Trump's claim that more than 1.8 million dead people will vote in the upcoming election, likely for his opponent, an example of "totally unfounded allegations" by the presidential nominee.

"All Donald Trump is trying to do is making an excuse for losing on Election Day, because he knows where it's going," Dillon said in the forum, presented by DOME Magazine. "Apart from that, it's really dangerous to start talking about the integrity of our Democratic system."

Later asked if Michigan voters should trust results from the Nov. 8 election, Hagerstrom told The Detroit News he would let Trump speak for himself.

"I think Mr. Trump will address the issues tonight. I'm sure that will be a subject of the debate," he said, referencing the third and final televised debate between Trump and Clinton, scheduled for 9 p.m. Wednesday. "I don't know if he's addressed Michigan."

Mich. GOP: Liberal media all-in for Hillary

Trump's election rigging claims have extended to the mainstream media. The businessman has alleged a coordinated effort between the media and the Clinton campaign, ramping up those claims in response to reports about multiple women who are alleging Trump sexually assaulted them in the past.

"I don't have any evidence of rigging by the Michigan media," Hagerstrom told The News. "I definitely see the national narrative though. The lack of reporting on the WikiLeaks."

"It seems like if something comes out on Trump, certain national media outlets rush to judgment quickly, but when something comes out with Hillary, if it's reported at all, it's very buried."

Dillon argued Trump was not so quick to suggest the elections were rigged when he "was running through the primary," topping a field of 17 GOP candidates.

"He wasn't complaining when it was wall-to-wall coverage of Trump rallies on CNN, MSNBC and Fox News," Dillon said.

The Center for Public Integrity reported Tuesday that journalists, reporters, news editors or television anchors and others working in the media have given a combined \$396,000 (<https://www.publicintegrity.org/2016/10/17/20330/journalists-shower-hillary-clinton-campaign-cash>) in contributions to presidential campaigns this cycle. More than 96 percent of that campaign cash went to Clinton.

"While many of (the donors) don't primarily edit or report on political news, some do," according to the report. The Washington Post noted the contributors do not include any presidential campaign trail reporters.

The Michigan Republican Party seized on the report, alleging that the "liberal media is all-in for Hillary" while making its own pitch for contributions.

"We are the silent majority, but we CANNOT stay silent and let Hillary Clinton steal this election," said the Michigan GOP fundraising email, suggesting contributions of \$50 to \$100 "to make sure we turn Michigan red for Trump and the entire Republican ticket!"

joosting@detroitnews.com

Detroit News Staff Writer Michael Gerstein contributed.



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