UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

NEVADA DEMOCRATIC PARTY,

Plaintiff,

v.

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

Defendants.

Civil Action No. 1:16-cv-2514

DECLARATION OF ELLYN LINDSAY

Pursuant to 28 U.S.C. § 1746, I, Ellyn Lindsay, declare as follows:

1. My name is Ellyn Lindsay. 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 Los Angeles, California. I graduated from law school in 1984, and after participating in the Department of Justice's Honors Program for two years, I became an Assistant U.S. Attorney in Los Angeles. I spent my career serving there as a federal prosecutor until I retired in August 2015.

3. Shortly before the California primary, I began volunteering for the Democratic Party in Los Angeles, knocking on doors, making phone calls, and encouraging people to vote for Democratic candidates and issues. Through my volunteer work, I learned that the Democratic Party was seeking lawyers to volunteer as poll observers for the 2016 General Election. As a

lawyer and a former federal prosecutor, I volunteered to help ensure that our election system functions with integrity.

4. On October 28, 2016 and October 30, 2016, I served as a poll observer at the Arroyo Market Square early voting location on S. Rainbow Boulevard in Las Vegas, Nevada. 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.

5. While serving as an observer at Arroyo Market Square, I met another observer named Kishanna Holland. Ms. Holland told me that she was serving as a poll observer for the Republican National Committee ("RNC"). She later confirmed this in a text message that she sent to me as well. A true and correct copy of that text message is attached hereto as Exhibit A. On October 28, Ms. Holland served as a poll observer at Arroyo Market Square from mid-morning until the polling location closed. On October 30, she arrived in the afternoon and was there at least until I left the voting location at 6:00 p.m.

6. Ms. Holland and I spoke frequently throughout both days. During the course of our conversations, Ms. Holland told me that she was a law student from New York, and that she would be staying in Las Vegas until November 10 to work on behalf of the RNC as a poll observer. She explained that she was part of a group of about 35 RNC lawyers and consultants who were working in Las Vegas, including some as poll observers. Ms. Holland explained that the group conferred daily via a conference call to debrief about what they observed at their polling locations. Ms. Holland herself took copious notes throughout the day on her observations to report back to a multistate group of RNC workers. She indicated to me that the RNC had

trained her on poll monitoring rules and at one point I saw her reference a printout of a power point training discussing the rules for observing polling locations. The page of the printout that I observed had approximately six slides on it. On another occasion I saw her fill out a form entitled "ELECTION INCIDENT REPORT." There was a hotline number at the bottom of the form.

7. Ms. Holland also told me that she had been instructed by the RNC that she did not have to tell anyone the party or organization for which she was observing the polls. Specifically, she showed me an email that she said was from the RNC, and which stated in bold lettering that as a poll observer she was not obligated to tell anyone that she was observing with the Republicans.

8. In addition to discussing her work with the RNC, Ms. Holland also told me that just the day before, October 27, 2016, a Trump Campaign observer had been asked to leave the Arroyo Market Square early voting location for yelling at voters, accusing voters and poll workers of breaking the law, talking to voters as they stood in line, and providing them with incorrect information. I confirmed Ms. Holland's story with the poll workers at the early voting location when I returned on October 30. The poll workers explained that the Trump Campaign observer was permanently banned from the voting location because of her disruptive behavior, but that she had continued to attempt to return to the voting site.

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

Dated: October 31, 2016

Respectfully submitted,

Ellyn Marcus Lindsay

Ellyn Lindsay

Exhibit A

Text Message

Yesterday 8:48 AM

Hi Ellen,

This is Shana from RNC. Here at Arroyo today and wishing you a great day!

What's your last name? Mine is Lindsay

Yesterday 11:06 AM

Holland

How's the trailer? How's the new DNC person?

I have a really great DNC observer. The CUNT from yesterday (Cecilia) is off her meds today and worse than usual.