

**DECLARATION OF TIMOTHY SELATY SR.**

(pursuant to 28 U.S.C. § 1746)

I, Timothy Selaty Sr., hereby declare as follows:

**Personal Background**

1. I am over the age of 18, and I make this declaration based on my personal knowledge.
2. I currently live in Spring, Texas.
3. I have been an active supporter of Donald Trump since 2012.
4. I am the Co-Founder, Executive Operations Director and Grassroots Organizer of Citizens for Trump. I work unpaid and spend 3-5 hours per day on this work. Large decisions such as those regarding media narratives, direction of the group, and appointing state directors are made by myself and approximately two other people.
5. I have seven years of experience organizing events, and have organized over a dozen in the last five years. These include a rally I organized in support of SB1070 in Arizona, that earned a lot of press coverage. There were over 3,000 people in attendance, including the official supporters of the bill and numerous members of the media. I also helped to organize the March for Jobs in Washington D.C, which roughly 5,000 people attended, and which also garnered national media coverage.
6. I am a web developer and social media marketer by trade, and have worked for four United States Senate and Congressional campaigns. I am planning the Citizens for Trump march along with a staff of 10 core volunteers, and more than 100 additional volunteers.

7. Citizens for Trump is a grassroots organization and was founded in July 2015 by Patriotic Warriors LLC, an organization of conservative activist that creates and maintains a network of website platforms to provide grassroots citizens who feel passionate about their patriotism an effective means to organize, engage, network, and support each other.
8. We at Citizens for Trump launched our website at the end of July 2015.
9. The goal of Citizens for Trump is to organize massive grassroots volunteer support to assist the official Trump presidential campaign in winning the Republican nomination, and the general election in November of 2016. Citizens for Trump does this as a group of engaged citizens using their voices to affect change in the political process. We coordinate, plan, and promote events and volunteer efforts to support the capacity of the Trump campaign. We work with Tea Party members, 912, Second Amendment coalitions, anti- common core groups, and Christian conservative groups. We have been in contact with the official Trump campaign at the national and state levels, though we are not agents of the Trump campaign.
10. Citizens for Trump is serving as a parent entity for other Trump support groups for the RNC rally only, because of the experience I and my colleagues at Citizens for Trump can offer. We are working in tandem with all of the stand-alone Trump support groups under this umbrella, which are: Truckers for Trump, Bikers for Trump, Women United for Trump, Tea Partiers for Trump, Students for Trump, Eternal Sentry, Diamond & Silk, and We Will Walk. When I first applied for a parade permit, it was for a unified activity by these eight groups, as we already had their support, but the permit was submitted only under the Citizens for Trump name.

11. I estimate that we have a reach of approximately 20 million people between our social media, website, and all of our partner groups listed above.

### **RNC Rally Planning**

12. In early April, 2016, I decided to have a march and/or rally at the Republican National Convention (RNC) when there was a possibility that the Republican Party might overrule Donald Trump's nomination. We wanted to have a protest march or rally to demonstrate to the Republic Party that our votes for Trump did matter and should not be dismissed by party officials. The name of our proposed event was "Our Votes Matter" and we requested for it to take place on Monday, July 18<sup>th</sup>, 2016 at Voinovich Park and the E 9<sup>th</sup> St. Pier, both central locations.

13. On April 25<sup>th</sup>, 2016, I submitted a permit application to Ms. Esha Hand via email, on behalf of Citizens for Trump to hold an "Our Votes Matter" rally and march. We requested the permit for Monday, July 18<sup>th</sup>, from 11am-5pm, and planned to have a large rally at Voinovich Bicentennial Park with a full stage and public address system. We had six secured featured speakers (Kenny Lee, Roger Stone, Diamond & Silk, George Lombardi, Jan Morgan, and Wayne Dupree), plus dozens more planned, including Hollywood stars. We planned to then march down E 9<sup>th</sup> St. to Quicken Loans Arena. We planned to have 100 motorcycles and 4 horses, and an overall attendance of over 5,000 people. This application and proposed route map are attached as an exhibit to the complaint.

14. The City never granted or denied that permit application. I called and emailed the City to follow up several times. I eventually received a call in mid-May from a woman from the

City, but she only said that she could not provide any information or timeline for my permit's approval.

15. When it became clear in early May, 2016 that the Republican Party was not likely to overrule Trump's nomination, after Ted Cruz and John Kasich dropped out of the race following the Indiana Primary, we decided to refocus that rally and call it the "America First Unity Rally." We envisioned this as a celebratory parade and rally with the goal of unifying the Republican Party. I waited to submit another permit.
16. I learned that the City had issued a new parade route and event zone regulations only through public means, by following articles about the City's May 25, 2016 press conference. I did not know the specific restrictions until Ms. Danielle Graham from the City sent me the new application via email on May 31, 2016.
17. The next day, June 01, 2016, I submitted another permit application using the City's updated RNC permit application form. The form was inadequate to use to request Citizens for Trump's planned rally. It only allowed a choice of one type of activity: a parade, a speech, OR a park use. So I checked all the boxes on the application. In the attached email I wrote that the new regulations were not acceptable for our planned event, and that we are still seeking to use Voinovich Park. I also checked the box for Willard Park because we would accept using Willard Park if we would be allowed to use sound amplification. Our assembly will be so large – as explained below, 5,000 people are expected – that we need decent amplification to reach all of our participants. My application and corresponding email are included as exhibits to the complaint.
18. Minutes after I submitted the application, on June 1, 2016, I received an email from Ms. Danielle Graham from the City confirming receipt of my permit application. The email

contained no information as to when my permit would be even considered, much less approved.

### **Effect of Regulations on Citizens for Trump's Planning Process**

19. The City's delay in granting permit applications has greatly reduced the number of people who will be attending our RNC march. Before the application dragged on, we estimated that roughly 50,000-100,000 people would attend our rally. This estimate was based on approximating that around 10% of Citizens for Trump's total reach (roughly 20 million following on our website and social media, and associated with the eight other Trump groups mentioned above) would attend. However, we have listed 5,000 on the permit application as the expected attendance. This is a lower estimate based on responses we have received, traffic on our website, and what we believe our organizing capacity to be at this point in the process.
20. The location of the City's designated parade route location is not conducive to what we had originally planned, as the route does not afford a good view of the convention site (and vice versa) and thus does not allow our message to reach those who most need to hear it—the very delegates who had at one point threatened to disregard our votes in support of Mr. Trump. Also, the timing of the parade slots do not match when the delegates will necessarily be at the convention. The parades end before the delegates arrive each day.
21. Our ability to organize the rally and pull off a march of the desired caliber hinges upon the timely approval of our permit application. We are unsure whether the City will grant a permit to hold our rally on the desired date of July 18, 2016, and this prohibits us from moving ahead with numerous aspects of planning. Some of our attendees, who will be

coming from all across the country, are discouraged from making plans. Every day that goes by that we aren't able to obtain the proper permit, it becomes less likely that we will be able to host a rally with the desired attendance and all of the proper equipment and staff.

22. Citizens for Trump has already spent roughly \$10,000 to pay deposits to secure lodging in hotels and rental homes for the main organizers and for guest speakers (speakers listed above in No. 13). If our permit does not get approved, or if it is approved so late that we are forced to cancel the march, we will lose this money already spent on lodging.
23. We have not been able to put down a deposit for audio and video services because we have not been able to obtain a permit. The total cost of audio and video services is \$17,000 and we must pay a 50% deposit to secure the services. The quote from Ground Floor LLC for these audio-visual services is attached as an exhibit to the complaint. We have not yet paid the 50% deposit. I was told by Ground Floor LLC that the availability of the equipment and price of this agreement was based on putting down the required deposit, so, due to the City's delay, if we can even obtain the equipment at this point, we may have to pay even more.
24. Some of the other items and services that we must secure and commit funds to include: advertising (\$10,000); transportation to Cleveland for organizers and speakers, as well as transportation from hotels to the parade route for all attendees, organizers, and speakers (minimum \$5,000-\$7,000); private security (\$2,000-\$3,000); portable toilets (\$1,000); liability insurance (unknown price); merchandise (\$3,000-\$5,000); tent and table rentals (\$2,000-\$3,000); food (\$1,000-\$2,000); and water (\$1,000-\$2,000). These rough price

estimates are based on online and in-person research I did initially; prices may have increased since then.

25. Because I still do not yet know if Citizens for Trump's permit will be approved, I have not been able to secure many crucial items and services that are needed for the rally. I am not willing or able to commit \$50,000 to an event that is not certain to happen, but every day that passes makes it more likely that these items and services will no longer be available for us, as many deadlines for initial deposits have already passed. Even if they are available, at this point just 5 weeks before the convention, they are certain to be scarcer and more expensive.
26. I had applied on April 18, more than 3 months before the convention, because lead time is absolutely necessary to make our event possible. Now, only 5 weeks remain and I still have no word about whether or when our application will be accepted, no word about what the terms might be, or whether our application might even be denied.
27. The City's delay in approving our permit has severely damaged our group's credibility. I am not able to provide any information to anyone about when our permit might be approved, and thus cannot make or publicize any final decisions to participants, to the media, to co-organizers, speakers, or vendors regarding the march or rally. I have received criticism from service contractors, fellow organizers, potential attendees, guest speakers, and surrogate groups, and I have had to apologize to individuals who have already spent money and/or made travel plans for their family and still do not know whether the rally will in fact occur.
28. The City's delay in approving our permit is causing us to lose potential attendees and other supporters, including Hollywood celebrities who would help bring visibility to our

march and aid us in delivering our message. It has been extremely difficult to get people to pledge their support for a rally that may not even get approved to occur.

29. The restriction of vehicles on the parade route and in the event zone has damaged our numbers for our rally and march. Two of our biggest surrogate groups that were planning to march are Bikers for Trump and Truckers for Trump. If these supporters cannot be part of our procession, it greatly damages our attendance numbers and thus our ability to convey our message.
30. Additionally, deadlines for securing hotel rooms are passing by, which further cuts down our attendance numbers. Many people traveling from out-of-town will no longer be able to do so if they do not have lodging.
31. The delay in the permit process largely impedes our ability to publicize our events. I am not able to advertise the march and rally, as I am not sure which day or at which time it will be allowed to happen, and furthermore if it will be allowed to occur at all.
32. I cannot spend any more funds on any type of promotion because I do not know if I can even hold the march. We had been doing some promotion but then we stopped. I had intended to contract with a company to create a TV commercial to advertise our march and rally, but I had to abandon that initiative.



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

Executed on June 13, 2016.

A handwritten signature in black ink, appearing to read "Tim Selaty". The signature is written in a cursive style with a large, stylized "T" and "S".

Timothy Selaty, Sr.