

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ThinkRight Strategies, LLC;
Grant Strobl; and
Jacob Chludzinski,

Plaintiffs,

v.

City of Ann Arbor,

Defendant.

Case No. 2:19-cv-12233-DML-RSW

**Declaration of Grant Strobl
in Support of Plaintiffs’
Preliminary Injunction
Motion**

I, Grant Strobl, declare as follows:

1. I am over the age of eighteen and competent to testify, and I make this declaration based on my personal knowledge.
2. I am one of the owners of ThinkRight Strategies, LLC (“ThinkRight”), a political consulting and marketing firm.
3. I founded ThinkRight with Jacob Chludzinski.
4. Jacob co-owns ThinkRight with me, with each of us having a fifty-percent (50%) interest in the company.
5. Jacob and I are the only owners of ThinkRight and, at this time, the only individuals who work at ThinkRight.
6. ThinkRight’s Articles of Organization, which Jacob and I filed in Michigan, became effective on July 3, 2018.

7. A true and correct copy of ThinkRight's Articles of Organization is included as Exhibit 3 in Support of Plaintiffs' Preliminary Injunction Motion.

8. In June 2019, ThinkRight launched its website, www.thinkrightstrategies.com, to inform the public of its services and allow the public to request ThinkRight's services.

9. True and correct images of that website are included as Exhibit 4 in Support of Plaintiffs' Preliminary Injunction Motion.

Political beliefs and introduction to politics

10. I am a political conservative.

11. Among other things, I believe in free enterprise, limited government, individual freedom, traditional values, and a strong national defense.

12. My political beliefs are based on my understanding of what policies are most conducive to human flourishing and my religious beliefs.

13. I have been a Christian since early childhood, and I base my religious beliefs on the Bible.

14. My religious beliefs are central to my identity and inform my worldview.

15. My interest in politics blossomed when I was around eleven or twelve years old and experienced firsthand how policy choices can affect real people in profound ways.

16. At that time, I was suffering from scoliosis and needed treatment.

17. My doctor insisted that I needed to see a surgeon about my condition, but my mom believed that physical therapy may be sufficient.

18. My doctor did not agree with my mom—who is a physical therapist herself, but does not specialize in treating those suffering from scoliosis—and was unwilling to support her desire to explore physical therapy as an alternative to surgery.

19. That presented a serious problem because Michigan law at that time did not allow people to obtain physical therapy unless they had a referral from a physician.

20. Without a doctor willing to refer for physical therapy, my mom and I drove many times from our home on the eastern edge of Michigan all the way to Wisconsin where I could obtain physical therapy without a physician's referral.

21. My mom's instincts were right, and the physical therapy allowed me to overcome my physical issues without needing to endure surgery and risk the complications that can follow.

22. This experience—being forced to flee my own state to obtain helpful treatment and avoid surgery simply because of government overreach—helped me realize the importance of limited government and recognize that I have a conservative worldview.

23. This experience also helped me realize that the worldview of others—the electorate and the elected—is critical for everyone’s success and wellbeing.

24. With this knowledge, I decided to try to make a difference.

Political campaign involvement and public service

25. While in middle school, I volunteered with my mom on the campaign of a Republican running for a seat in the Michigan House of Representatives.

26. One of that candidate’s goals was to work toward changing the law that forced me out of Michigan to obtain the treatment I needed.

27. That campaign was the beginning of my direct involvement in politics.

28. That campaign also made me realize that the website and graphic design skills I had been teaching myself could be put to good use in promoting my political values.

29. With those skills, I helped that campaign—and many more in the following years—communicate its message to the public via a website.

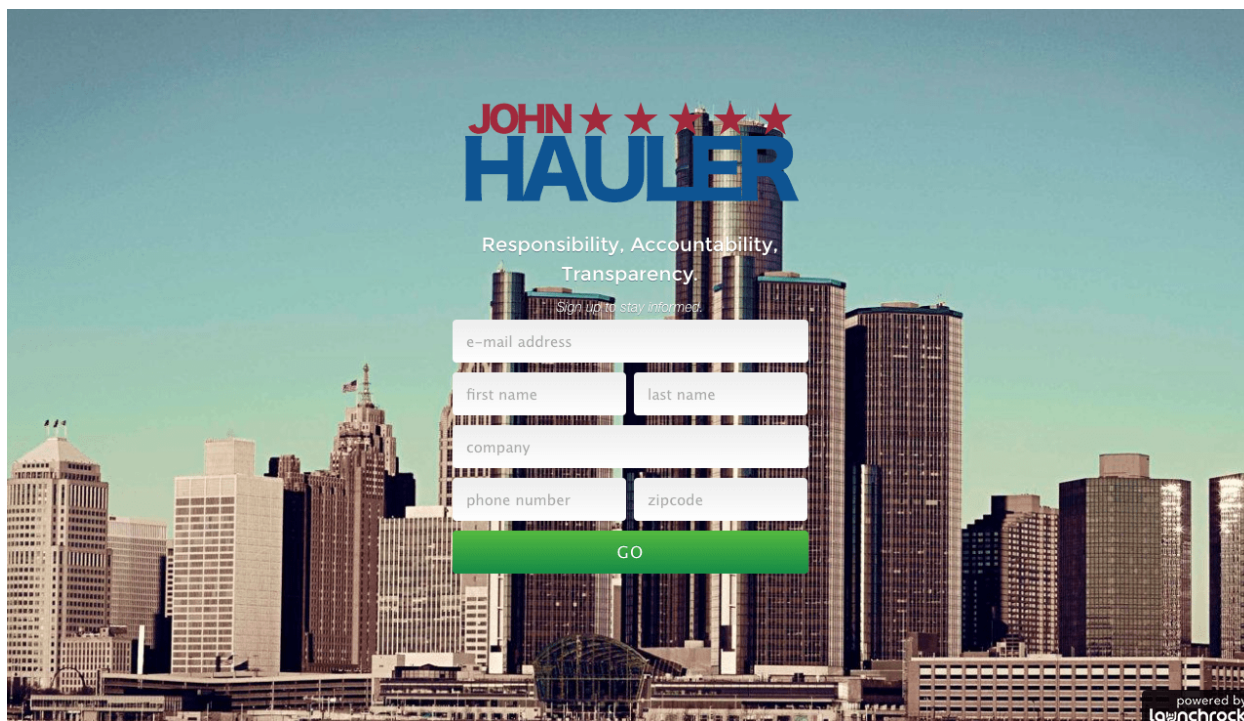
30. While in high school, I served as the campaign manager for Residents for Responsible Spending (a group opposing a bond requiring a tax increase), as a provider of website and other services for two Republicans’ campaigns for the Michigan House of Representatives, as

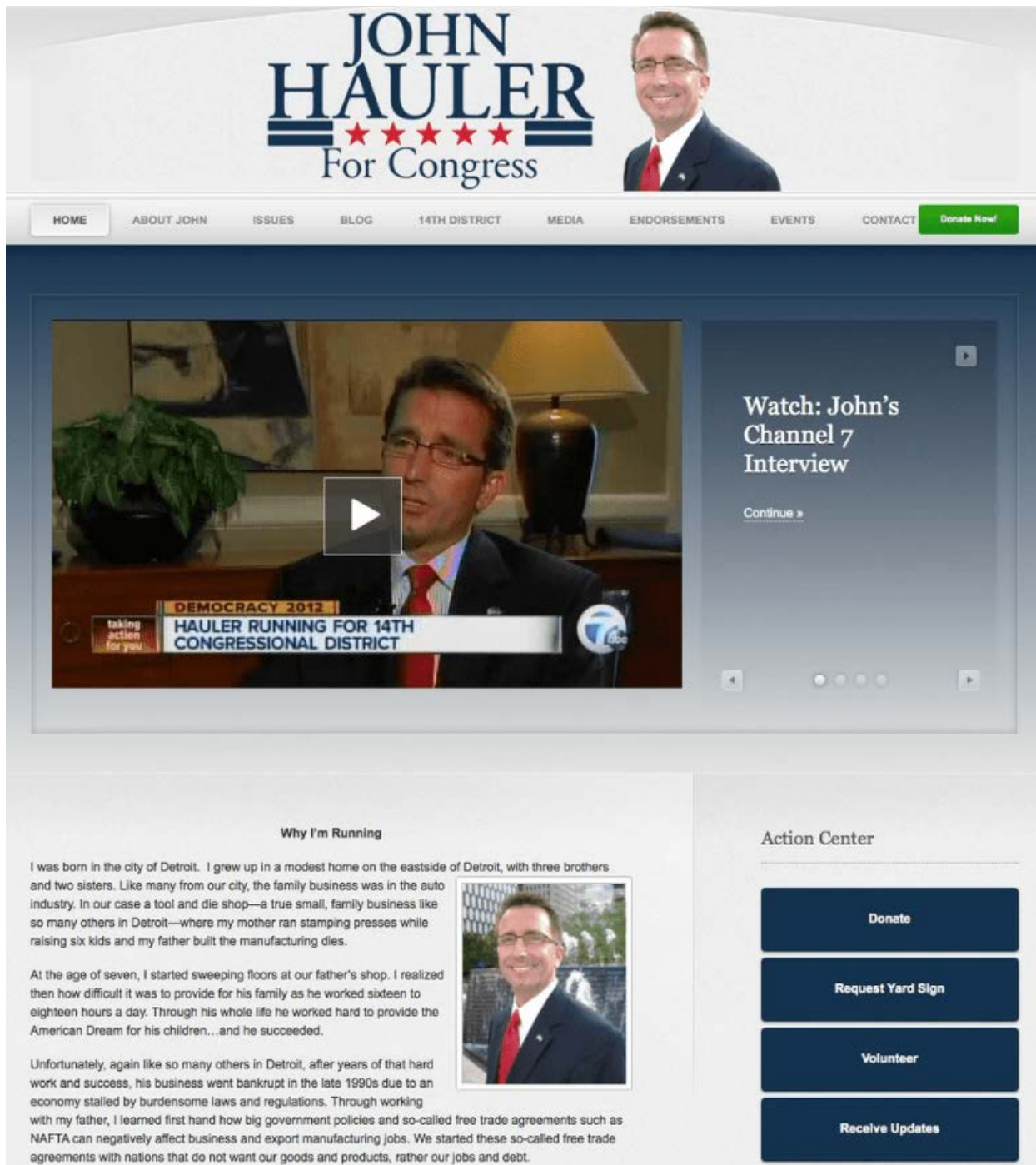
a committeeman for my hometown's Parks & Harbor Committee, as a provider of a website for a school-board candidate, as a campaign coordinator for a Republican's congressional campaign, and as a new media and technology intern for Republican Rick Snyder's gubernatorial campaign.

31. For some of those campaigns, I designed and created the campaign website, developed messaging and slogans, and used my graphic-design skills to create yard signs, brochures, posters, flyers, and social-media posts.

32. For example, I created a campaign website to assist John Hauler (a Republican) in his bid for Congress.

33. Some portions of that website are pictured below.





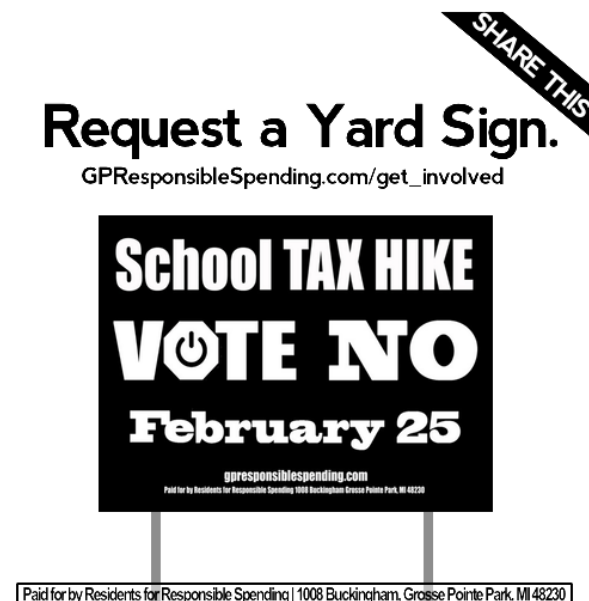
34. True and correct images of portions of that website are included as Exhibit 5 in Support of Plaintiffs' Preliminary Injunction Motion.

35. As another example, I created the graphic pictured below for use on social media while working on Rick Snyder's gubernatorial campaign.



36. A true and correct image of that graphic is included as Exhibit 6 in Support of Plaintiffs' Preliminary Injunction Motion.

37. While working with Residents for Responsible Spending, I also created the graphic pictured below for use on social media.



38. A true and correct image of that graphic is included as Exhibit 7 in Support of Plaintiffs' Preliminary Injunction Motion.

39. In working with Residents for Responsible Spending, I also obtained experience in assessing a campaign's ideal target audience and using voter data to determine who falls within that target audience so the campaign can reach them with a tailored message.

40. In addition to learning through doing, I participated in website design training through NationBuilder—a company providing software designed for campaigns and certain other organizations.

41. I also received training about campaign management from a Republican organization.

42. In August 2014, only months after my high-school graduation, I began serving as a Committeeman for Michigan's 14th District Republican Executive Committee, and I served in that role for over four years.

43. I designed and created the website for Michigan's 14th District Republican Executive Committee and continue to manage that website.

44. During much of my time with the Committee, I managed all of the Committee's digital assets (including its social media accounts) and its monthly newsletter.

45. In 2016, I had the honor of serving as a delegate to Michigan's Republican State Convention.

46. While beginning college at the University of Michigan, I continued the work I began in high school as a new media and technology intern for Republican Rick Snyder's gubernatorial campaign.

47. In that position, I learned new skills relating to designing effective websites and social-media platforms.

48. Between high school and college, I served as the deputy campaign manager for a Republican running for a seat in the Michigan House of Representatives.

49. While in college, I also assisted an Ann Arbor resident's campaign for a position on the University of Michigan's Board of Regents.

Political involvement on campus and through YAF

50. During high school, I became involved with Young Americans for Freedom (YAF), an organization which promotes conservative principles on high-school and college campuses.

51. As a freshman at a public high school, I witnessed one of my teachers using the classroom as a platform to espouse views I disagreed with.

52. This experience contributed to my decision to found a YAF chapter at my high school during my sophomore year so that students would be exposed to competing viewpoints.

53. I served as chairman of my high school's YAF chapter for three years.

54. During that time, my high school's administration repeatedly resisted YAF's efforts to educate the student body.

55. This experience increased my understanding of how expressing competing views to an audience can have a powerful effect—and because of that, speech is often met with resistance.

56. Instead of giving in, I respectfully, yet firmly, pushed back against my high school's administration to ensure that YAF could carry out its mission.

57. For example, when my high school's principal refused to allow the YAF chapter to host Steve Forbes for a speech at the school, I succeeded in leading an effort to have our school board adopt a new policy explicitly allowing student groups to host speakers and hang posters at the school advertising the speeches.

58. Because of those efforts, our YAF chapter was able to have Steve Forbes speak to an audience of about 1,300 at my high school.

59. This, among other successes, demonstrated that I can make a difference and that it is critical for people to move past complaining about problems to strategically advocate for positive change.

60. After graduating high school, I continued to be very involved with YAF.

61. Because I wanted to continue spreading conservative values while in college, I used my summer orientation at the University of

Michigan as an opportunity to gather signatures to found a YAF chapter there.

62. After founding that YAF chapter, I served as its chairman for three years and remained significantly involved during my senior year, at which time Jacob Chludzinski served as chairman.

63. In addition to my work with YAF at the chapter level—both while in high school and college—I also work with YAF at a national level.

64. I served as a member of YAF's national Board of Governors from August 2014 through September 2016.

65. In September 2016, I became National Chairman of YAF's national Board of Governors and I still serve in that role.

66. As National Chairman, I have helped lead the nation's foremost conservative youth outreach group and manage a multimillion-dollar budget.

67. I have also helped guide other decisions at YAF, such as initiatives to promote student engagement and the issues campus chapters should prioritize.

68. In addition to my work with Young Americans for Freedom, I am also actively involved YAF's parent organization, Young America's Foundation.

69. I served as the National Chairman Fellow for the Young America's Foundation during the summers of 2017 and 2018.

70. As National Chairman Fellow, I worked on various projects, including creating a guide to help high-school students educate their classmates about conservative ideals.

Other experiences and recognitions

71. Given my interest in communicating publicly about political issues, I worked as a College Associate for the “Hannity” program on Fox News Channel, where I helped cover the Republican and Democratic National Conventions and other political matters.

72. Because of my interest in political advocacy, I wrote a senior thesis entitled *Do Presidential Campaign Advertisements Matter for Early Voter Turnout?*

73. I prepared that thesis as part of the University of Michigan’s Department of Political Science’s honors program, and the Department awarded me “high honors” based on the thesis.

74. In preparing the thesis, I devoted significant time to researching how political communication can affect voter behavior.

75. In addition to majoring in political science, I also majored in international studies and minored in German studies at the University of Michigan. I received a Bachelor of Arts degree in 2018 with high distinction.

76. Beyond studying government, I was able to get an inside look at government when I worked as an intern for the U.S. House of Representatives’ Committee on House Administration.

77. I also learned more about governance while serving as Chairman of Government Relations with Central Student Government at the University of Michigan.

78. Because law is policy, I also interned in 2017 at the Heritage Foundation's Edwin Meese III Center for Legal and Judicial Studies, where I conducted research and wrote about various policy matters.

79. I am currently studying law, and recently completed my first year of studies at Notre Dame Law School.

80. At Notre Dame, I was active in the school's Federalist Society chapter and served as its 1L class representative.

81. The University of Chicago Law School accepted me as a transfer student, and I plan to complete my legal studies there.

82. This summer, I am honored to be assisting in the defense of key liberties through my work at the United States Department of Justice, where I am a summer associate in the Civil Rights Division of the Office of the Assistant Attorney General.

83. I have received multiple recognitions based on my history of political involvement.

84. For example, while in middle school, my city honored me with a "Mayoral Proclamation of Grant Strobl Day" because of my political involvement.

85. In 2013, 2014, 2015, and 2016, I ranked first among conservative activists recognized by Young America's Foundation.

86. In 2016, *Red Alert Politics* (now the *Washington Examiner*) named me to its “30 Under 30” list of conservative leaders making an exceptional impact.

87. In 2017, *Newsmax* named me to its “30 Most Influential Republicans Under 30” list.

88. Over the years, I have given speeches at a variety of events (including the Conservative Political Action Conference, or CPAC), made multiple appearances on national television, written numerous op-eds for various national and local publications, and been interviewed for many news stories about a variety of political matters.

Launching ThinkRight Strategies in Ann Arbor

89. As one who is passionate about politics and policy, I am always looking for ways to make a difference by engaging in those fields.

90. My passion and past experiences led me to launch ThinkRight Strategies to allow for greater involvement and impact in those arenas.

91. Jacob and I selected Ann Arbor, Michigan, as ThinkRight’s principal place of business for many reasons.

92. Jacob and I wanted to base ThinkRight in Michigan—the state where we were born and raised and consider home.

93. Within Michigan, Ann Arbor is the only city where both Jacob and I have lived, and it is where we met and first collaborated together.

94. Both Jacob and I have an affinity for Ann Arbor and connections with political conservatives within the city from our years of political activism there while attending the University of Michigan.

95. When founding ThinkRight, we knew that Jacob's presence in Ann Arbor could help us build relationships there to further ThinkRight's advocacy.

96. All of these considerations made Ann Arbor the ideal location for ThinkRight.

ThinkRight's political selectivity

97. Jacob and I will provide, through ThinkRight, various services to promote messages, views, policies, platforms, and causes that further our conservative principles, including services materially similar to those depicted above and on ThinkRight's website.

98. Because ThinkRight exists to advance the conservative political principles Jacob and I share, we also wish to decline all requests for ThinkRight's services that involve promoting political messages, views, policies, platforms, or causes contrary to our political or religious beliefs.

99. When ThinkRight receives such an objectionable request, ThinkRight wants to politely decline with the following message or a

materially similar message: “Thank you for contacting ThinkRight Strategies. Unfortunately, we determined that the service(s) you requested would require us to promote messages, views, policies, platforms, or causes that are contrary to our conservative political beliefs. While we must decline your request, we’re confident that you’ll find others who would be glad to partner with you in advancing your goals. Thanks again, and have a great day.”

100. But ThinkRight will not convey this message or a materially similar message because of Ann Arbor’s Accommodation Clause (Ann Arbor Code § 9:153).

101. Unfortunately, certain political movements advocate against some or all of the political and religious beliefs Jacob and I hold and seek to advance through ThinkRight.

102. For example, the platforms of the Democratic Party and the Socialist Party of Michigan state many political beliefs and goals that are directly contrary to the political beliefs and goals that Jacob and I hold and seek to advance through ThinkRight.

103. The Socialist Party of Michigan platform is available at <http://spmichigan.org/platform/>.

104. I have visited the webpage associated with that link, and a true and correct Adobe PDF conversion of that webpage is included as Exhibit 8 in Support of Plaintiffs’ Preliminary Injunction Motion.

105. The Democratic Party platform is available at https://democrats.org/wp-content/uploads/2018/10/2016_DNC_Platform.pdf.

106. I have viewed the document associated with that link, and a true and correct copy of that document is included as Exhibit 9 in Support of Plaintiffs' Preliminary Injunction Motion.

107. Jacob and I cannot, for example, provide ThinkRight's services to assist a lawmaker or political candidate who seeks to advance the current platforms of the Democrat Party or the Socialist Party of Michigan.

108. For instance, ThinkRight cannot create an ad materially similar to the one pictured below encouraging people to vote for those supporting the Socialist Party of Michigan's platform.



109. An image of the graphic above is included as Exhibit 10 in Support of Plaintiffs' Preliminary Injunction Motion.

110. Nor can ThinkRight advocate for complete—or unjustified—government control of people’s healthcare at taxpayer expense by creating an ad materially similar to the one pictured below encouraging people to support Medicare for All.



111. An image of the graphic above is included as Exhibit 11 in Support of Plaintiffs’ Preliminary Injunction Motion.

112. Nor can ThinkRight create an ad materially similar to the one pictured below encouraging people to support the “Green New Deal,” which would result in excessive and oppressive regulations.



113. An image of the graphic above is included as Exhibit 12 in Support of Plaintiffs' Preliminary Injunction Motion.

114. Because Jacob and I believe that all people are created in the image of God, that they should be judged by the content of their character rather than the color of their skin, and that America's greatness flows from its principles rather than the racial composition of its citizenry, ThinkRight will not provide services to promote preferences for certain races or other forms of racism.

115. Therefore, ThinkRight will not create an ad materially similar to the one pictured below for any candidate, cause, lawmaker, or organization.



116. An image of the graphic above is included as Exhibit 13 in Support of Plaintiffs' Preliminary Injunction Motion.

117. Because Jacob and I believe in the sanctity of life—including the lives of unborn babies—we cannot provide ThinkRight’s services to assist individuals or organizations in pursuing a pro-abortion agenda.

118. So, for example, ThinkRight will not create a graphic like the one pictured below for Planned Parenthood Advocates of Michigan to advertise an election guide promoting candidates supporting abortion.



119. An image of the graphic above is included as Exhibit 14 in Support of Plaintiffs’ Preliminary Injunction Motion.

120. ThinkRight would, however, willingly create a graphic materially similar to the one pictured above (but sufficiently different to avoid infringement issues) for the Susan B. Anthony List to advertise an election guide that promotes candidates that stand for the protection of unborn life.

121. Similarly, ThinkRight would create a graphic materially similar to the one pictured below—which ThinkRight designed and created—for Right to Life Michigan to promote pro-life pregnancy centers, but not for Planned Parenthood to promote abortion.



122. An image of the graphic above is included as Exhibit 15 in Support of Plaintiffs' Preliminary Injunction Motion.

123. As another for example, ThinkRight will not create the ad pictured below or a materially similar ad supporting a candidate running on a pro-abortion platform.



124. An image of the graphic above is included as Exhibit 16 in Support of Plaintiffs' Preliminary Injunction Motion.

125. While ThinkRight would create a campaign website materially similar to the one I created for John Hauler (see paragraph 34) for a Republican running on a platform consistent with the political and religious values Jacob and I hold, ThinkRight would not be willing to create such a website for a Democrat running on a platform supporting taxpayer funded abortion or oppressive tax rates.

126. ThinkRight would also be willing to create a campaign ad materially similar to the one pictured below (but sufficiently different to avoid infringement issues) for a candidate seeking to further the political and religious values Jacob and I hold, but not for those seeking to promote socialism (like Bernie Sanders).



127. An image of the graphic above is included as Exhibit 17 in Support of Plaintiffs' Preliminary Injunction Motion.

128. Moreover, ThinkRight would be willing to create a campaign ad materially similar to the one pictured below (but sufficiently different to avoid infringement issues) for a candidate seeking to further the political and religious values Jacob and I hold, but not for those seeking to promote abortion (like Governor Gretchen Whitmer).



129. An image of the graphic above is included as Exhibit 18 in Support of Plaintiffs’ Preliminary Injunction Motion.

130. The examples above are just a few illustrations of the types of work that ThinkRight can and cannot do because of the values Jacob and I seek to further.

Political selectivity is common among political consultants

131. Like ThinkRight, other political consulting firms similarly seek to advance only certain values.

132. As one political scientist remarked, “[t]here’s a Democratic market and a Republican market, and most [political consulting] firms only participate in one or the other.”

133. This information is available at

<https://prospect.org/article/how-political-consulting-became-multibillion-dollar-racket>.

134. I have visited the webpage associated with that link, and a true and correct Adobe PDF conversion of that webpage is included as Exhibit 19 in Support of Plaintiffs' Preliminary Injunction Motion.

135. For example, Macias Strategies LLC in Texas explains that it is a "political consulting firm motivated by conservative policy outcomes" and that it "work[s] exclusively with true conservative Republicans."

136. This information is available at

<https://maciasstrategies.com/>.

137. I have visited the webpage associated with that link, and a true and correct Adobe PDF conversion of that webpage is included as Exhibit 20 in Support of Plaintiffs' Preliminary Injunction Motion.

138. Ozean Consulting in Florida describes itself as "a full-service Republican political consulting agency" providing a variety of services, including assistance with web design and social media.

139. Ozean emphasizes that it serves "*Republican* candidates & campaigns, *conservative* causes, and *conservative* ballot initiatives" (emphasis in original).

140. This information is available <http://ozeanconsulting.com/>.

141. I have visited the webpage associated with that link, and a true and correct Adobe PDF conversion of that webpage is included as Exhibit 21 in Support of Plaintiffs' Preliminary Injunction Motion.

142. Recipricol Results in New York explains that it offers its political consulting services—such as the op-ed writing it did for Bill de Blasio's mayoral campaign—to “Democratic, Liberal, Progressive and ideologically neutral candidates and causes.”

143. This information is available at <http://reciprocalresults.com/services.html> and <http://reciprocalresults.com/clients.html>.

144. I have visited the webpages associated with those links, and true and correct Adobe PDF conversions of those webpages are included as Exhibit 22 in Support of Plaintiffs' Preliminary Injunction Motion.

145. Shadwell Strategies is located in Virginia, but explains that it “is able to work anywhere in the United States.”

146. This information is available at <https://www.shadwellstrategies.com/the-history-of-shadwell-strategies>.

147. Shadwell Strategies provides many of the same types of political consulting and marketing services offered by ThinkRight, including creating websites, developing effective communication strategies, drafting social-media posts and press releases, assisting in media relations, and providing media training.

148. Shadwell Strategies exists to promote particular political values, explaining on its website that it “provides general consulting services to *progressive* candidates” (emphasis added).

149. This information is available at <https://www.shadwellstrategies.com/strategic-political-consulting>.

150. Shadwell Strategies also explains that its “efforts are meant to provide counterbalance to [the] divisive, ultra-conservative ideologies which are gaining popularity within our Nation.”

151. This information is available at <https://www.shadwellstrategies.com/our-mission>.

152. I have visited the webpages associated with those links for Shadwell Strategies, and true and correct Adobe PDF conversions of those webpages are included as Exhibit 23 in Support of Plaintiffs’ Preliminary Injunction Motion.

153. AKPD Message and Media is a political consulting firm with offices in multiple locations, including New York City, Chicago, and Los Angeles.

154. AKPD offers a variety of services, including message development, drafting speeches, developing techniques and strategies for succeeding in media interviews, and assisting with debate preparation.

155. This information is available at <https://akpdmedia.com/message-delivery/>.

156. AKPD offers its services to candidates across the nation, and has provided services to Michigan Secretary of State Jocelyn Benson (a Democrat) and the Michigan Democratic Party.

157. This information is available at <https://akpdmedia.com/spotlightblog/>.

158. AKPD's homepage specifies that AKPD is in the business of "Representing Democratic Candidates & Progressive Causes."

159. This information is available at <https://akpdmedia.com/>.

160. I have visited the webpages associated with those links for AKPD, and true and correct Adobe PDF conversions of those webpages are included as Exhibit 24 in Support of Plaintiffs' Preliminary Injunction Motion.

161. Bronstein & Weaver in Pennsylvania describes itself as "a leading Democratic political media and strategic messaging firm," and its clients have included the New York State Democratic Committee, the Pennsylvania State Democratic Committee, and the New Jersey Democratic State Committee.

162. This information is available at <http://www.bronsteinandweaver.com/about> and http://www.bronsteinandweaver.com/client_list.

163. Bronstein & Weaver states that it "wins campaigns and advances Democratic causes."

164. This information is available at <http://www.bronsteinandweaver.com/home>.

165. I have visited the webpages associated with those links for Bronstein & Weaver, and true and correct Adobe PDF conversions of those webpages are included as Exhibit 25 in Support of Plaintiffs' Preliminary Injunction Motion.

166. While it is common for political consulting firms like ThinkRight to work to promote only certain political beliefs because the firm's owners wish to advance their views about how to make society better, practical business considerations may also guide political consulting firms to work exclusively on the political right or left.

167. Indeed, as one political scientist noted, it is "much more effective from a business perspective to have [political] consultants specialize for one party or the other." *See* Ex. 19 in Support of Plaintiffs' Preliminary Injunction Motion.

168. Based on my political experience and understanding of business and politics, political consultants' clients will often need to trust their political consultants with extremely sensitive information such as campaign strategies, financial strength, areas of weakness, and concerns about various opponents.

169. Because of this, many political candidates, causes, lawmakers, and non-profits that seek to advance certain political values

will hesitate to contract with and confide in political consultants who advocate for political values contrary to their own.

170. For instance, the Democratic Party (national or local) is likely to hesitate to hire a political consulting firm to assist in one election cycle if it knows the firm will, if asked, assist the Republican Party (national or local) in a subsequent election cycle.

171. That is because, in part, a political consulting firm that assists political candidates, causes, lawmakers, and non-profits that are ideological opponents may, even when trying to be as ethical as possible, be influenced by the confidential information it learns on one side of the political divide when suggesting strategies to the other side.

172. Thus, while Jacob and I will only work to advance our values because we seek to effectuate positive—not negative—change, we also believe that it would be difficult for ThinkRight to find clients willing to partner with us to advance the political values we hold if ThinkRight helps others oppose those values.

Many options are available for clients ThinkRight cannot assist

173. A requestor who cannot use ThinkRight's advocacy services can obtain advocacy services from other political consulting and marketing firms, some of which provide services across the nation.

174. While ThinkRight promotes conservative political beliefs, the section above lists multiple political consulting firms that are dedicated to promoting liberal political beliefs.

175. There are many other options available as well.

176. In Michigan, for example, one option for liberal candidates and causes is The Edelson Group, “a full-service political consulting firm specializing in strategy development and comprehensive management for issue advocacy, ballot measures and candidate campaigns.”

177. The Edelson Group touts that it “[r]elected Governor Granholm,” a Democrat.

178. This information is available at <http://edelsongroup.com/>.

179. Howard Edelson, the President of the Edelson Group, describes himself as a “Democratic political strategist and commentator.”

180. This information is available at <https://twitter.com/howardedelson>.

181. I have visited the webpages associated with those links for The Edelson Group and Howard Edelson. A true and correct Adobe PDF conversion of The Edelson Group’s webpage (<http://edelsongroup.com/>) and a true and correct image of the relevant portion of Howard Edelson’s Twitter page (<https://twitter.com/howardedelson>) are included as Exhibit 26 in Support of Plaintiffs’ Preliminary Injunction Motion.

182. DiSano Strategies, a political strategy and public relations firm in Michigan, is another option for those who wish to advance policies contrary to ThinkRight’s conservative values.

183. Its owner, Joe DiSano, explains on his website that he's "been proud to work for causes [he] believe[s] in, including... reproductive rights...."

184. This information is available at <http://www.joedisano.net/about-2/>.

185. DiSano Strategies offers assistance in a variety of areas, including campaign strategy, media advertising, public relations, social media, and opposition research.

186. DiSano Strategies explains that it knows "how to reach voters on a visceral level with messaging, social media campaigns and ads that they respond to and remember."

187. DiSano's prior clients include Planned Parenthood of Michigan, the Michigan Democratic Party, Progress Michigan, Harry Reid's Senate Majority PAC, Michigan State Senator Curtis Hertel, Jr. (a Democrat), Michigan State Senator Steve Bieda (a Democrat), and Michigan State Representative Kristy Pagan (a Democrat).

188. This information is available at <http://www.joedisano.net/services/>.

189. I have visited the webpages associated with those links for DiSano Strategies, and true and correct Adobe PDF conversions of those webpages are included as Exhibit 27 in Support of Plaintiffs' Preliminary Injunction Motion.

Declaration under penalty of perjury

I, Grant Strobl, a citizen of the United States and a resident of the State of Michigan, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 26th day of July, 2019, at Washington, D.C.



Grant Strobl