

DECLARATION OF WILLIE GRAYEYES

I, **WILLIE GRAYEYES**, acting in accordance with 28 U.S.C. § 1746, do hereby declare and say:

1. My name is Willie Grayeyes.
2. I am an enrolled member of the Navajo Nation.
3. I reside in the Navajo Mountain Chapter.
4. I maintain my full-time residency at Navajo Mountain in San Juan County, Utah.
5. Navajo Mountain is my principal place of residence.
6. I have lived in Navajo Mountain, Utah, almost my whole life. My entire family and clan is from San Juan County, Utah.
7. I attended school at Navajo Mountain.
8. The latitude/longitude coordinates for my home are 37.084477, -110.626033. See Exhibits A and B, Satellite Imagery and Latitude/Longitude Coordinates for the Principal Residence of Willie Grayeyes.
9. My home is in a very rural location near Piute Mesa in Utah. There are only three houses in the immediate vicinity.
10. I have resided at this home for at least 20 years and intend to remain there permanently and indefinitely.
11. I maintain a Post Office Box in Tonalea, Arizona. The Post Box number is 10035, and the zip code is 86044.
12. Most people in the Navajo Mountain community maintain a mail box, subcontract post office, under Tonalea, Arizona, based on convenience (80 miles away) and the fact that Tonalea provides prompt and reliable post office service.

13. I serve as the Chair of the Board of Directors for Utah Diné Bikéyah.
14. I am the Chapter Official for Navajo Mountain, Utah.
15. I am currently the Secretary/Treasurer for Navajo Mountain Chapter.
16. I am Chairman of the School Board for Naatsis'aan Community School.
17. I have been a registered voter in San Juan County, Utah, since I turned 18.
18. I have voted in almost every primary and general election in San Juan County since 2000.
19. If San Juan County reviewed their own voter file that they maintain on me, they would find that I voted in the 2000 Primary and General Elections, the 2002 General Election, the 2006 General Election, the 2008 Primary and General Elections, the 2010 General Election, the 2012 General Election, the 2014 General Election, the 2015 General Election, and the 2016 Primary and General Elections.
20. I have never voted in any other state.
21. In 2012, I was certified as the Democratic candidate in the former San Juan County Commission District 1 by the Lieutenant Governor of the State of Utah based upon my residence in Utah and Navajo Mountain. Exhibit C, 2012 Partial List of Certified Democratic Candidates.
22. According to the Memorandum Decision and Order, Dkt. 441, dated December 21, 2017, I reside in the new, Court-ordered District 2 of the San Juan County Commission for the 2018 Primary and General elections.
23. On March 15, 2018, I filed with the San Juan County Clerk's Office as a Democratic candidate for Court-ordered County Commission District 2. Exhibit E, Court Ordered Election Districts for San Juan County Commission.

24. I was at Navajo Mountain on March 21, 2018, for a meeting at school and left afterward. The next day, on March 22, 2018, Maggie Holgate from the school called me to tell me that Sheriff was looking for me. Apparently, he talk with my sister, Rose Mary Johnson, regarding where I live. My sister indicated that she didn't specify where I lived to him at that time, but Investigator Turk later said that my sister said I lived somewhere else other than Navajo Mountain.

25. I called Mr. Turk after his visit to follow up and we agreed to meet in person.

26. At the San Juan County Democratic Convention on March 24, 2018, I was nominated as the Democratic candidate for the new, Court-ordered District 2 of the San Juan County Commission for the General Election in 2018.

27. On April 4, 2018, I met with Officer Turk from the San Juan County Sheriff's Department in Bluff, Utah. Mr. Turk told me that the purpose of his visit was to determine my permanent residence.

28. During that visit, I described to Mr. Turk where I lived, Mr. Turk told me that he was unable to locate my residence.

29. I received a letter from the San Juan County Clerk/Auditor, John David Nielson, dated March 28, 2018, stating that my right to vote and hold office in San Juan County, Utah, was challenged by Wendy Black, of Blanding, Utah.

30. I have never met, and do not personally know, Wendy Black.

31. The letter stated that the basis of Ms. Black's challenge was that my primary residence is not within San Juan County, Utah, but the State of Arizona.

32. I am not a resident of Arizona.

33. The letter states that I have an opportunity to refute the challenge.

34. The letter did not contain any evidence or provide a description of the facts and circumstances that formed the basis for Ms. Black's challenge.

35. I have not been provided with a copy of the affidavit Ms. Black was required to file as part of her challenge.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed on April 19, 2018

BY:


Name: Willie Grayeyes