

**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 Jacob
Chludzinski in Support of
Plaintiffs' Preliminary
Injunction Motion**

I, Jacob Chludzinski, 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 Grant Strobl.
4. Grant co-owns ThinkRight with me, with each of us having a fifty-percent (50%) interest in the company.
5. Grant and I are the only owners of ThinkRight and, at this time, the only individuals who work at ThinkRight.
6. I have read the “Declaration of Grant Strobl in Support of Plaintiffs’ Preliminary Injunction Motion” and I agree with, and adopt

as my own, all of Grant's statements in that declaration regarding ThinkRight and me.

7. I am a political conservative.

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

9. As a musician—I'm a drummer and percussionist who performs with church worship teams and my college's marching band—I'm particularly sensitive to the importance of free speech.

10. My political beliefs are rooted in my understanding of what policies are most conducive to human flourishing and my religious beliefs.

11. I am a Christian, and I was baptized and confirmed in the Catholic Church.

12. I base my religious beliefs on the Bible.

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

14. I grew up in Michigan, and my interest in political issues became pronounced during middle school.

15. During that time, I learned a lot from my friends who were very political. I also began doing my own research about political issues and learned about policy issues through discussions with my family and from my church's teachings on various matters (like abortion).

16. These experiences reinforced that I held conservative political beliefs, and I became eager to help advance those beliefs.

17. When I was a freshman in high school in 2012, I helped start a small Republican club.

18. During my freshman year, I also volunteered for Mitt Romney's campaign and for the campaign of a Republican running for County Commissioner.

19. In high school, in addition to trying to persuade people to vote for certain politicians, I was elected president of the school's student government my senior year.

20. As a freshman at the University of Michigan, I met Grant and became involved with Young Americans for Freedom (YAF).

21. YAF gave me an excellent opportunity to engage with others about important political issues and to assess strategies for conveying political messages persuasively.

22. During my sophomore and junior years, I served as chairman of the university's YAF chapter.

23. As chairman of the chapter, I served as our chapter's spokesperson about various political matters, spearheaded various campus events to convey conservative political messages, managed our chapter's website, worked on improving our chapter's social-media presence, and learned basic graphic-design skills.

24. During my senior year, which I plan to complete in 2020 with a double major in political science and economics, I will work closely with the incoming chairman of the university's YAF chapter.

25. In addition to my work with YAF, I have also participated in important political discussions on campus through my involvement with "WeListen."

26. WeListen is a campus group that seeks to bring together students from across the political divide to discuss important political issues in small groups.

27. I serve as WeListen's Vice President of Content.

28. In that role, I research various political issues (e.g., gun control, immigration, healthcare, and abortion) to help prepare a fact sheet and PowerPoint presentation about each of the topics of discussion.

29. Prior to each discussion, WeListen provides those fact sheets and presents those PowerPoint slides to students so they can learn about the relevant subjects before the discussions.

30. Through my participation in WeListen, I have researched competing arguments about critical political issues of our day, gained a better understanding of the assumptions and principles that lead those who disagree with me to reach their respective policy positions, and observed which facts, arguments, and communication techniques are successful in swaying people's political beliefs about various issues.

31. While in college, I have also been directly involved in state politics.

32. In 2017, during the summer between my freshman and sophomore year of college, I interned in the Lansing and district offices of then-Representative Peter Lucido, a Republican.

33. During that time, Lucido was running for a seat in the Michigan State Senate, and I also assisted with that campaign.

34. In working for Lucido, I worked on different projects, including assisting with social-media efforts, helping analyze the district to determine where flyers should be distributed, writing responses to constituent correspondence, and encouraging people to attend fundraising events and vote for Lucido.

35. During the summer of 2018, I assisted Lucido with a political event before spending the rest of my summer interning at the White House Office of Presidential Personnel in Washington, D.C.

36. During my White House internship, I did detailed research about the backgrounds of individuals the Executive Branch was considering hiring or promoting.

37. This experience allowed me to hone skills I can deploy to conduct “opposition research” for lawmakers and candidates who need to know their political opponents’ positions, strengths, and weaknesses in order to determine the best campaign and communication strategy.

38. My internship also allowed me to learn from professionals in the world of politics and communication, including General John Kelly (then-White House Chief of Staff), General James Mattis (then-Secretary of Defense), Kellyanne Conway (Counselor to the President), and Tucker Carlson (political commentator), all of whom presented to the interns.

39. I am eager to draw upon my many experiences and knowledge to advance my conservative political beliefs.

40. In studying political science at the University of Michigan and interacting with students on campus, it is apparent to me that some of my classmates—who could be the leaders of tomorrow—disagree with me about fundamental political tenets.

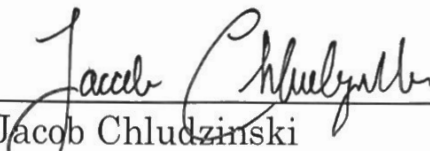
41. This has given me greater motivation to educate people about the dangers of government overreach and the importance of individual freedom and other conservative political principles.

42. This, coupled with my love for politics and passion to improve society, are among the reasons I decided to found ThinkRight Strategies with Grant.

Declaration under penalty of perjury

I, Jacob Chludzinski, 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 26 day of July, 2019, at Chicago, Illinois.



Jacob Chludzinski