IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
v.)
ETHAN NORDEAN, et al.,) Case No.: 21-cr-175 (TJK)
Defendants.	}

DECLARATION OF DANIEL ARELLANO

I, DANIEL ARELLANO, declare as follows:

- I am a resident of the State of Washington. I am the current President of Proud Boys Seattle Chapter (PBSC). I replaced Ethan Nordean as President of PBSC by a vote of the chapter membership in February 2021.
- 2. It is my understanding that Ethan's release order was revoked at least in part on the basis that he was a member of the "Elders chapter" of the Proud Boys and that he was the president of his local chapter (PBSC) in Washington State. Hr'g Trans., Apr. 19, 2021, p. 16:8-9. This constituted his "leadership role." *Id.*, p. 44:5.
- The Elders chapter of the Proud Boys no longer engages in any activity and is pending dissolution upon a vote of the remaining participating membership this coming June 2021.
- 4. The Proud Boys Pacific Northwest Region (Proud Boys PNW), including PBSC, are now autonomous of, and have no connection to, any national group. Proud Boys PNW, including all the chapters thereof (representing Proud Boys chapters in the states of Washington, Oregon, Idaho, and Montana), elected to disassociate itself from national Proud Boys organization and leadership as of February 2021.

5. Ethan Nordean is no longer President of Proud Boys Seattle Chapter, nor any other Proud Boys chapter. He no longer has any leadership role in PBSC or Proud Boys PNW. He is no longer a participant in any Proud Boys Internet communications, and has not been since his arrest in February 2021, including the period between March 3, 2021 and April 19, 2021 during which he was released on house arrest.

I declare under penalty of perjury under the laws of the United States of America and the District Court for the District of Washington, D.C., that the foregoing representations are true and correct.

Executed this 16 day of May 2021 in

Seattle, Washington

Daniel Arellano