

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

REPUBLICAN NATIONAL)
 COMMITTEE,)
)
 Plaintiff,)
)
 v.)
)
 NANCY PELOSI, et al.,)
)
 Defendants.)

Case No. 1:22-cv-00659-TJK

**SUPPLEMENTAL DECLARATION OF CHRISTIAN SCHAEFFER IN SUPPORT
OF PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

I, Christian Schaeffer, hereby declare as follows under the penalty of perjury.

1. The following statements are based on my personal knowledge, and if called to testify I could swear competently thereto.
2. I am over 18 years of age and of sound mind.
3. I am a citizen of the United States.
4. I attended The George Washington University in Washington, D.C. where I studied Political Communication and Political Science.
5. I am the Chief Digital Officer (“CDO”) for the Republican National Committee (“RNC”), a position I have held since February of 2021. In this role, I am responsible for developing and executing RNC digital strategy and operations, including messaging, fundraising, and related data management. Before assuming my current role, I was the Digital Political Director from February 2019 to January 2021. Prior to the RNC, I worked as a digital political consultant for a leading vendor in the political digital communications industry for approximately two and a half years.

6. I have read and am familiar with the subpoena issued by the U.S. House Select Committee to Investigate the January 6th Attack on the U.S. Capitol (“Select Committee”) to Salesforce (“Salesforce Subpoena”).

7. As CDO, I am deeply familiar with the services Salesforce provides to the RNC, as well as the nature and breadth of the data metrics and analytics likely to be produced if Salesforce discloses the RNC records demanded in the Salesforce Subpoena. In addition, I am familiar with the RNC’s overall activities that took place during the range of dates for which the subpoena demands materials, and the RNC’s political digital fundraising strategy in general.

8. The RNC is the national party committee of the Republican Party. It is an unincorporated organization registered with the Federal Election Commission pursuant to 52 U.S.C. § 30101(14).

9. The RNC communicates digitally with tens of millions of individuals each month. The vast majority of these communications occur over email.

10. The RNC exists to advance the Republican Party and its electoral prospects. It conducts party business, builds party infrastructure, supports Republican candidates and state parties, advances Republican policy goals, and raises funds to support these efforts.

11. Digital communication is a critical component of the RNC’s ability to conduct political activities. The RNC relies upon its ability to interact virtually with millions of Americans through email and other digital media to recruit volunteers, persuade voters to support Republican candidates and policies, encourage voting through its “get out the vote” (“GOTV”) activities, convey political messaging, and raise funds. The RNC routinely engages such individuals with fundraising appeals, surveys, petition requests, and other messaging in furtherance of its political mission. In recent years, the RNC has come to increasingly rely on digital efforts for its fundraising and to reach its voters more effectively.

12. In my prior declaration in this matter, I noted that the RNC uses three platforms provided by Salesforce. These platforms are the “Sales Cloud,” “Marketing Cloud,” and

“Datorama” platforms. My prior declaration describes how the RNC uses these Salesforce platforms.

13. I have read the Memorandum of Law in Opposition to Plaintiff’s Motion for Preliminary injunction filed in this case on March 23, 2022 by the Congressional Defendants (Dkt. No. 17). On page 39 of this Memorandum of Law, the Congressional Defendants cite to Salesforce’s public version of its Master Subscription Agreement. While there are some differences between the public Salesforce Master Subscription Agreement and the RNC’s Master Subscription Agreement, the confidentiality provisions are substantively similar and require Salesforce to treat RNC’s confidential information in the same manner it treats its own confidential information and to provide the RNC a reasonable opportunity to contest any compelled disclosure of its data held by Salesforce.

14. The RNC retains ownership of all its data on Salesforce’s platforms and also maintains the ability to access and download this data at any time.

15. The information on Salesforce’s platforms includes subject lines of e-mails and the groups of persons to whom the RNC sent certain messages, including how the RNC names, categorizes and markets to these groups. This information reflects the RNC’s audience segmentation and targeting strategy because it reveals the naming and labeling of audiences and sub audiences the RNC has developed and even reveals the internal naming conventions for all e-mail sends from the RNC, revealing internal strategy and decision making.

16. The RNC closely guards the information on the Salesforce platforms and assigns user permissions to its employees based on the level of access necessary to do their job. All RNC employees granted access to any Salesforce platform are subject to a strict non-disclosure agreement which requires that they protect the information on these platforms and not remove any such information from the RNC.

17. On the Sales Cloud platform, there are currently 15 active users, but only four of these users have Administrator level permissions which allow them to see all the information on the Sales Cloud platform the Salesforce Subpoena demands. Similarly, on the Datorama

platform, there are currently 54 active users, but only three of these users have Administrator or Power User level permissions which allow them to see all the information on the Datorama platform the Salesforce Subpoena demands. Finally, on the Marketing Cloud platform, there are a total of 59 users, but only 15 of these users have permissions allowing them to see all the information on the Marketing Cloud platform the Salesforce Subpoena demands.

18. At most there are three employees at the RNC with global access to the Salesforce platforms that would allow them access to all the information demanded by the Salesforce Subpoena.

I declare under the penalty of perjury under the laws of the United States, 28 U.S.C. § 1746, that the foregoing statements are true and correct.

Signed this 29th day of March, 2022.



Christian Schaeffer