

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

DONALD J. TRUMP

Plaintiff,

v.

HILLARY R. CLINTON, HFACC, INC.,  
DEMOCRATIC NATIONAL COMMITTEE,  
DNC SERVICES CORPORATION, PERKINS  
COIE, LLC, MICHAEL SUSSMANN, MARC  
ELIAS, DEBBIE WASSERMAN SCHULTZ,  
CHARLES HALLIDAY DOLAN, JR., JAKE  
SULLIVAN, JOHN PODESTA, ROBERT E.  
MOOK, PHILLIPE REINES, FUSION GPS,  
GLENN SIMPSON, PETER FRITSCH,  
NELLIE OHR, BRUCE OHR, ORBIS  
BUSINESS INTELLIGENCE, LTD.,  
CHRISTOPHER STEELE, IGOR DANCHENKO,  
NEUSTAR, INC., RODNEY JOFFE, JAMES  
COMEY, PETER STRZOK, LISA PAGE,  
KEVIN CLINESMITH, ANDREW MCCABE,  
JOHN DOES 1 THROUGH 10 (said names  
being fictitious and unknown persons), and  
ABC CORPORATIONS 1 THROUGH 10 (said  
names being fictitious and unknown entities),

,

Defendants.

Case No.: 2:22-cv-14102-DMM

**DECLARATION OF ALINA HABBA, ESQ.**

I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for Donald J. Trump (“Plaintiff”) in the above-captioned matter (the “Action”).
2. I submit this declaration pursuant to Federal Rule of Civil Procedure 65 and Local Rule 7.1, in support of Plaintiffs’ Memorandum of Law in Opposition to Defendants’ Motion to

Dismiss the Amended Complaint. The facts herein are true and correct and, unless otherwise stated, are within my personal knowledge.

3. As counsel for Plaintiff, I have reviewed pleadings, and other documents related to the Action, and I am familiar with the facts and circumstances of this case.

4. Attached hereto as **Exhibit A** is a true and accurate copy of the First General Counsel's Report dated April 10, 2019 in the matter of *In the Matter of DNC Services Corp./Democratic National Committee and William Q. Derrough in his official capacity as treasurer; Hillary for America and Elizabeth Jones in her official capacity as treasurer; Perkins Coie LLP; Marc Elias; Fusion GPS; Christopher Steele*, Federal Election Commission (FEC), MURs 7291, 7331 and 7449, and the corresponding Certification of the FEC executive session dated July 26, 2021.

5. Attached hereto as **Exhibit B** is a true and accurate copy of the Indictment dated September 16, 2021 in the matter of *United States v. Sussmann*, case no. 1:21-cr-00582-CRC, United States District Court, District of Columbia.

6. Attached hereto as **Exhibit C** is a true and accurate copy of the Government's motion *in limine* dated April 4, 2022 in the matter of *United States v. Sussmann*, case no. 1:21-cr-00582-CRC, United States District Court, District of Columbia.

7. Attached hereto as **Exhibit D** is a true and accurate copy of the Indictment dated November 3, 2021 in the matter of *United States v. Danchenko*, case no. 1:21-cr-00245-AJT, Eastern District of Virginia.

Dated: August 4, 2022,

By:



Alina Habba, Esq.

**HABBA MADAIO & ASSOCIATES LLP**  
1430 U.S. Highway 206, Suite 240  
Bedminster, New Jersey 07921

-and-

112 West 34<sup>th</sup> Street, 17<sup>th</sup> & 18<sup>th</sup> Floors  
New York, New York 10120

Telephone: (908) 869-1188

Facsimile: (908) 450-1881

E-mail: ahabba@habbalaw.com

*Attorneys for Plaintiff,*

*Donald J. Trump*