Exhibit E

DECLARATION OF WAYNE THORLEY

Exhibit E

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

STANLEY WILLIAM PAHER, TERRESA MONROE-HAMILTON, and GARRY HAMILTON, Plaintiffs, vs. BARBARA CEGAVSKE, in her official capacity as Nevada Secretary of State, DEANNA SPIKULA, in her official capacity as Registrar of Voters for Washoe County, Defendants.	Case No. 3:20-cv-00243 **DECLARATION OF WAYNE THORLEY IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION**

I, WAYNE THORLEY, declare as follows:

I am the Deputy of Elections for the Nevada Secretary of State. I was appointed to the position of Deputy of Elections pursuant to NRS 225.060(1), and I have held the position since October 21, 2015. I have personal knowledge of the matters set forth below, and if called upon to testify in the above-captioned matter, I would testify as follows:

1. NRS 293.2725(1) requires first-time voters in Nevada to present identification and proof of residency before being allowed to vote, whether in person or by mail. However, NRS 293.2725(2)(b) waives the requirement to present identification and proof of residency for first-time voters if election officials are able to match the voter's driver's license number, ID card number or social security number with personal identifier on file with the Nevada Department of Motor Vehicle (DMV) or Social Security Administration (SSA).

2. When voter registration applicants register (1) by mail, (2) through the DMV by appearing in person or using the DMV's on-line system, or (3) via the Secretary of State's on-line system, the overwhelming majority of those applicants are positively matched to the personal identifiers on file with the DMV or the SSA. The match is made through automated systems, and to the best of my knowledge, the systems are highly reliable.

3. Voters who are positively matched to personal identifiers on file with the DMV or SSA are not required to present identification and proof of residency before voting, even if they are voting for the first time in Nevada. They can simply vote in person or by mail without submitting to additional verification processes.

4. With respect to the few voters who are not positively matched to personal identifiers on record with the DMV or SSA—almost always because of a typographical or printing error in their application to register to vote—those voters must present identification and proof of residency before voting. This requirement is not waived simply because county elections officials will be mailing them ballots for the June 9, 2020 primary election.

5. Voters who must present identification and proof of residency before voting are referred to as "ID-required" voters. The ballot return envelope for ID-required voters is different than the return envelopes for all other voters.

6. The return envelope for ID-required voters indicates on the envelope flap that the voter must return a copy of the voter's identification and proof of residency. If the required identification and proof of residency is not provided, the vote will not be counted.

7. ID-required voters represent a very small percentage of all registered voters. I can confidently estimate that the percentage of ID-required voters in Washoe County is less than 1% of all registered voters.

8. Five states currently conduct elections entirely by mail. These are Oregon, Washington, Colorado, Utah, and Hawaii. In Nevada, mailing precincts (as opposed to absent ballot precincts) have been used on a very small scale for many years without any incidents of election fraud. I am personally unaware of a single instance of confirmed or alleged fraud in Nevada's traditional mailing precincts.

9. In recent Nevada elections, the numbers of ballots that were cast by the voters in mailing precincts is statistically significant, thus providing a reasonable sample of ballots cast without incident. The numbers are as follows:

2018 General – 3,879

2018 Primary – 2,273

2016 General – 6,069

2016 Primary – 362

2014 General – 4,288

10. For the 2020 primary election in Nevada, the Secretary of State, in partnership with Nevada's 17 county election officials, developed a plan to implement an all-mail election in order to diminish the spread of COVID-19. The decision to hold the all-mail primary was announced to the public on March 24, 2020.

11. Although voters will have limited options to vote in person, the goal of Nevada's state and local election officials is to strongly encourage widespread voter participation by mail. Among other reasons related to voter access, the decision was made to establish at least one physical polling place in each of Nevada's counties and in Carson City in order to accommodate the same-day registration requirements enacted by the 2019 Nevada Legislature.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 24th day of April, 2020.

/s/ *Wayne Thorley*
WAYNE THORLEY

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 24th day of April, 2020, I filed with this Court's CM/ECF electronic filing system, **DECLARATION OF WAYNE THORLEY IN SUPPORT OF OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION,** and served by electronic mail to the address listed below:

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