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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
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11 STEPHANIE CLIFFORD a.k.a.
STORMY DANIELS,

12 Plaintiff,

13 vs.
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15 DONALD J. TRUMP,

16 Defendant.
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CASE NO.: 2:18-cv-06893-SJO-FFM

**DECLARATION OF STEPHANIE
CLIFFORD IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT DONALD J. TRUMP'S
SPECIAL MOTION TO
DISMISS/STRIKE COMPLAINT
PURSUANT TO ANTI-SLAPP
STATUTE OR, ALTERNATIVELY,
TO DISMISS COMPLAINT
PURSUANT TO FRCP 12(b)(6)**

Assigned to the Hon. S. James Otero

Action Filed: April 30, 2018

Hearing Date: September 24, 2018

Hearing Time: 10:00 a.m.

Location: 350 West 1st Street

Courtroom 10C

Los Angeles, CA 90012
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DECLARATION OF STEPHANIE CLIFFORD

I, STEPHANIE CLIFFORD, declare as follows:

1. I am the Plaintiff in this action. I am over the age of 18 years. I am submitting this declaration in support of Plaintiff’s Opposition to Defendant Donald J. Trump’s Special Motion to Dismiss/Strike Complaint Pursuant to Anti-SLAPP Statute or, Alternatively, to Dismiss Complaint Pursuant to FRCP 12(b)(6). I have personal knowledge of the information stated herein and if called to testify to the same would and could do so.

2. The allegations set forth in the Complaint filed on my behalf in this action are, to the best of my ability to recall, a true and accurate account of the circumstances surrounding the threatening encounter I experienced in May of 2011 in Nevada.

3. The sketch of the man who threatened me in 2011 that was released on my behalf on or about April 17, 2018 is a true and accurate representation of his appearance based on my ability to recall it. A copy of that sketch is attached to this Declaration as Exhibit 1.

4. Since Defendant Donald J. Trump’s April 18, 2018 tweet regarding the sketch I released and my account of the threatening encounter in 2011, I have received an increase in threats and abuse, including scorn and ridicule, directed at me by certain members of the public. The threats and abuse include death threats and threats of physical violence. As a result, and among other things, I have felt emotional distress and mental anguish that has impacted my life. It is apparent to me, based on the increase in these threats, that Mr. Trump’s statement has injured and harmed my reputation among certain members of the public.

5. Because of the threats and abuse I have received following Trump’s April 18, 2018 tweet, I have had to continue to retain the services of professional bodyguards and other protective services to ensure my personal safety. My concern over my personal safety has increased since Mr. Trump’s statement as has the necessity for personal security.

1 I declare, under penalty of perjury and under the laws of the United States of
2 America, that the foregoing is true and correct. I have executed this declaration on
3 September 3, 2018.

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6 /s/ Stephanie Clifford
Stephanie Clifford
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