

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 15-cv-22452-KMM

DENNIS MONTGOMERY,

*Plaintiff,*

vs.

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION, et al.,

*Defendants.*

---

**DECLARATION OF MICHAEL GERMAN IN SUPPORT  
OF DEFENDANTS' MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION AND IMPROPER VENUE**

Michael German declares under penalty of perjury as follows:

1. I am presently a fellow with the Brennan Center for Justice's Liberty and National Security Program. I live in New York, NY. Prior to joining the Brennan Center in January 2014, I worked the American Civil Liberties Union's Washington Legislative Office, and some years earlier as a Special Agent of the Federal Bureau of Investigation, also headquartered in Washington, D.C. I make this declaration in support of the motion of defendants in the above-captioned matter to dismiss for lack of personal jurisdiction and improper venue, recognizing that this is not the occasion to be litigating the falsity of virtually all the various allegations made against me in the Complaint, and that only venue and jurisdiction, and not the falsity of other allegations, are the proper subject of this declaration.
2. None of the allegations about me in the Complaint, including but not limited to those at paragraphs 14-20, allege that I have taken any action in or aimed at Florida in connection with Mr. Montgomery, and I have not done so.

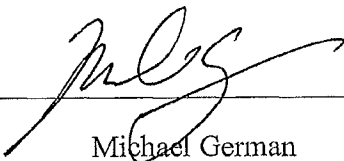
3. Nor have I sought, in connection with Mr. Montgomery or any of the allegations lodged in the Complaint in this action, to avail myself of any privileges of doing business with or in Florida. I have never been to Florida to meet with him, or communicated with him in Florida, or taken any action with respect to him aimed at Florida, or which I imagined might have some impact in Florida. When I worked for the ACLU's Washington Legislative Office, I traveled to Miami, Florida in 2009 to speak at an anti-money laundering conference, and to Orlando, Florida in 2012 to participate in an ACLU conference, but never on any matter involving or related to Dennis Montgomery.

4. I did speak with Mr. Montgomery some years ago on one or possibly two occasions, when I was employed by ACLUF's Washington Legislative Office. I was not in Florida on any of those occasions, and I understood him to be in the western United States (he contacted me through a 619 area code). During the few times we had any contact, I never knew him to be, or understood him to be, in Florida.

5. I never established an attorney-client relationship with Mr. Montgomery when either of us was in Florida (or at all).

6. I am not counsel in, or otherwise involved in any way in, the litigation in Arizona that is the focus of his claims in the above-captioned lawsuit, *Melendres v. Arpaio*, 2:07-2513 (D. Az.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 22, 2015.

  
\_\_\_\_\_  
Michael German