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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON  
5 FOR THE COUNTY OF CLACKAMAS

6 MIKE ERICKSON FOR CONGRESS  
7 COMMITTEE, a political committee,

8 Plaintiff,

9 vs.

10 ANDREA SALINAS FOR OREGON  
11 COMMITTEE, a political committee, and  
12 ANDREA SALINAS, an individual,

13 Defendants.

No. 22CV33968

**DECLARATION OF ANDREA  
SALINAS**

14 I, Andrea Salinas, declare:

15 1. I am over the age of 18. I am fully competent to make this affidavit. The  
16 following statements are based on my personal knowledge.

17 2. I am a candidate in the 2022 U.S. House of Representatives race for  
18 Oregon's sixth congressional district.

19 3. I am running against Mike Erickson, the Republican candidate.

20 4. My official campaign is known as Andrea Salinas for Oregon Committee.  
21 The campaign employs a number of employees, including my campaign manager,  
22 Shannon Geison. Ms. Geison is responsible, on behalf of staff, for overseeing the  
23 development, review, and placement of advertisements supporting my election. I  
ultimately review and approve our advertisements.

24 5. In September 2022, I authorized the airing of a political advertisement  
25 concerning Mike Erickson's criminal history.

26 6. At the time I approved this advertisement, I believed it was true and correct  
in all material respects. I continue to believe this is the case.

7. I had and have no reason to believe any of the information in the advertisement was untrue or inaccurate.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED this 1<sup>st</sup> day of November, 2022.

Andrea Salinas

## ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2022, I have made service of the foregoing **DECLARATION OF ANDREA SALINAS** on the party/ies listed below in the manner indicated:

Jill O. Gibson  
Lynch Murphy McLane LLP  
1120 NW Couch Street, Tenth Floor  
Portland, OR 97209  
*Attorney for Plaintiff*

<input type="checkbox"/>	U.S. Mail
<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	Hand Delivery
<input type="checkbox"/>	Overnight Courier
<input checked="" type="checkbox"/>	Email <a href="mailto:jgibson@lynchmurphy.com">jgibson@lynchmurphy.com</a>
<input checked="" type="checkbox"/>	Odyssey File & Serve™

DATED this 2nd day of November, 2022.

s/ Harry B. Wilson  
Harry B. Wilson, OSB #077214  
Attorney for Defendants

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