

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 15-cv-20782-MARTINEZ/GOODMAN

DENNIS MONTGOMERY,

Plaintiff,

v.

JAMES RISEN et al.,

Defendants.

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DECLARATION OF MICHAEL F. KANE

In accordance with 28 U.S.C. § 1746, I, Michael F. Kane, declare:

1. Except as otherwise stated, I have personal knowledge of, and am competent to testify on, the facts set forth in this declaration.

2. I am an Investigative Specialist at the law firm Holland & Knight LLP, two lawyers of which—Sanford L. Bohrer and Brian W. Toth—serve as counsel of record for Defendants in the above-captioned action.

3. On March 9, 2015, I conducted a search in, and generated a report from, a LexisNexis Accurint for Legal Professionals database on Dennis Lee Montgomery (the “LexisNexis Report”). This is the LexisNexis Report referred to in the Declaration of Laura Handman ¶ 6. (ECF No. 25-1.)

4. The LexisNexis Report contains publicly available information on Mr. Montgomery.

5. According to the LexisNexis Report, there are three voter registrations for Mr. Montgomery. The state of registration for each of the voter registrations is Nevada. None is Florida.

6. On April 14, 2015, after I had generated the LexisNexis Report, Mr. Bohrer informed me that Mr. Montgomery on February 23, 2015, purportedly registered to vote in Miami-Dade County, Florida.

7. To determine why Mr. Montgomery's February 23, 2015, registration did not appear on the LexisNexis Report, I talked with a LexisNexis representative on April 21, 2015. The LexisNexis representative informed me that the State of Florida provides voter-registration information to LexisNexis only twice a year. The LexisNexis representative also informed me that December 2014 was the last time that the LexisNexis Accurint for Legal Professionals database was updated with voter-registration information from the State of Florida.

* * *

I declare under penalty of perjury that the foregoing is true and correct.

Executed April 23, 2015


Michael F. Kane