

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CONGRESSMAN RON PAUL, <i>et al.</i> ,	)	CIVIL ACTION NO. 02-CV-781
Plaintiffs,	)	(CKK, KLH, RJL)
	)	
v.	)	Consolidated with
	)	CIVIL ACTION NOS.
	)	02-CV-582 (CKK, KLH, RJL) (Lead)
FEDERAL ELECTION COMMISSION, <i>et al.</i> ,	)	02-CV-581 (CKK, KLH, RJL)
Defendants.	)	02-CV-633 (CKK, KLH, RJL)
	)	02-CV-751 (CKK, KLH, RJL)
	)	02-CV-753 (CKK, KLH, RJL)
	)	02-CV-754 (CKK, KLH, RJL)
	)	02-CV-874 (CKK, KLH, RJL)
	)	02-CV-875 (CKK, KLH, RJL)
	)	02-CV-877 (CKK, KLH, RJL)
	)	02-CV-881 (CKK, KLH, RJL)

**DECLARATION OF ANONYMOUS WITNESS NO. 1**

I make this declaration pursuant to 28 U.S.C. Section 1746, as follows:

1. I am an adult American citizen, a resident of the United States, and a registered voter. I am the owner of a company which does business in the United States. I have asked that my name be kept confidential in this proceeding, both because I value my privacy, and because I am concerned that disclosure of my name could adversely affect my business interests. The attorneys for the plaintiffs in this action have my name and address which I have authorized them to disclose on a confidential basis to the Court, as well as to counsel in this case, if required by the Court or by the procedures governing this action.

2. I consider myself to be a Republican and am generally libertarian in political outlook. I am committed to contribute to candidates for federal office who understand, will live within, and will fight to re-establish the Founder's limitations on the powers of the federal government. I have never sought personal benefit from any candidate for federal office or

federal office holder, unless, of course, one could say that urging across-the-board reduction in tax rates could be said to result in a personal benefit.

3. Over the past decade I have contributed the maximum of \$1,000 per election to many candidates for federal office, including Ron Paul, in multiple election cycles. For example, I have contributed \$1,000 for the primary election and \$1,000 in the general election in the same election cycle for Ron Paul in the 1990s. For example, I have made such contributions not only to help elect Ron Paul and others to federal office, but also to support Ron Paul's policy and educational efforts, and the policy and educational efforts of other candidates for federal office, both incumbents and challengers.

4. I have contributed the maximum of \$5,000 per year to one federally-registered multi-candidate political committee in more than one year. I have made such contributions not only to the committee's efforts to support candidates, but also to support the policy positions that the committee was advancing through its support of such candidates.

5. I believe that limitations imposed by the Federal Election Campaign Act and the Bipartisan Campaign Reform Act (BCRA) on my right to contribute from my personal funds more than any specified amount to candidates for federal office unfairly and discriminatorily restrict my First Amendment rights and are unconstitutional. I contribute to others so that they can do that which I could not do myself, or do as well, and to supplement what I do myself. As a businessman, I do not have the time to promote aggressively the libertarian ideas and limited government policies to which I am deeply committed. Because of my personality and temperament, I firmly believe that I would not be as persuasive a spokesman for those ideas and policies to persons who are not close acquaintances or people who are not like minded.

Even if I had more available time and native ability, I want to support the efforts of many like-minded people to advance the cause of freedom. By giving money to others, especially candidates for election to federal office, I am deliberately choosing to associate with their efforts, with the common purpose of informing and persuading others to embrace ideas and policies based on the Constitution, and, if the persons I support are elected, furthering those ideas and policies by their actions as government officials.

6. I also believe that it is an unconstitutional invasion of my privacy to have the disclosure of my name as a contributor to a candidate for federal office compelled by the federal government. Prior to becoming involved as a witness in this litigation, I knew that campaigns and committees to which I contributed maintained records that would contain my name, and I thought that the Federal Election Commission (FEC) probably could examine those records during an audit, but had not realized that my name was regularly disclosed to the FEC, and I certainly did not know that it was accessible to the public on the Internet. After agreeing to become a witness, I have learned that my name is accessible on [www.opensecrets.org](http://www.opensecrets.org), and I have looked it up and seen the details of my political giving history exposed in a way that troubles me greatly. I believe that no one in government or outside government should have access to such information about myself, including which candidates I support or oppose. Further, I seek to separate my personal politics from my business generally. For example, I find that it is very difficult to convince others in a work environment to change their mind about any issue, and I generally do not try to do so. While I do not know of any instance where the disclosure of my name has caused a harm to my business — such as where a customer told me that he saw to whom I gave and would no longer

do business with me — I have some concern, now that I am aware that my giving history is public, that this may have already happened to some degree. And there is no question in my mind that such harm could occur in the future. Our company has a retail component, and I know that my company has many customers on whom we rely who would not agree in the slightest with my politics. I could envision a scenario where public disclosure of one of my donations could cause me to not contribute to a specific federal candidate or political committee in the future. I believe that it is harmful to require such public disclosure, just as it would be harmful to disclose how my votes were cast in a particular election.

7. If limitations on my ability to contribute to federal candidates were removed before the effective date of BCRA, I certainly would contribute more than \$1,000 per election to Ron Paul, and perhaps to other federal candidates as well. And I certainly would want that option, which I believe would give me the choice for more meaningful participation in the federal election process.

8. If limitations on my ability to contribute to federal candidates were removed after the effective date of BCRA, I certainly would contribute more than \$2,000 per election to Ron Paul, and perhaps to other federal candidates as well. And I certainly would want that option, which I believe would give me the choice for more meaningful participation in the federal election process.

9. If limitations on my ability to contribute to federally-registered multi-candidate political committees were removed, I certainly would contribute more than \$5,000 per year to a multi-candidate political committee to which I have previously contributed the maximum of

\$5,000. And I certainly would want that option, which I believe would give me the choice for more meaningful participation in the federal election process.

I declare under penalty of perjury that the above statements are true and correct.

Anonymous Witness #1  
Anonymous Witness No. 1

Executed On 10-3-02