

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.                |
| FEDERAL ELECTION COMMISSION, <i>et al.</i> , | ) | 02-CV-582 (CKK, KLH, RJL) (Lead) |
| Defendants.                                  | ) | 02-CV-581 (CKK, KLH, RJL)        |
|  | ) | 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 THOMAS LIZARDO**

Thomas Lizardo, Chief of Staff of the Office of Ron Paul, United States Congressman for the 14th District of the State of Texas, declares pursuant to 28 U.S.C. Section 1746 as follows:

1. I am Thomas Lizardo. I am Chief of Staff of the office of Ron Paul, United States Congressman for the 14th Congressional District of the State of Texas. In 1995 and 1996, prior to my becoming Chief of Staff, I served as a paid political consultant to the Ron Paul for Congress Committee, the authorized principal campaign committee for Ron Paul in his campaign for election to the House from the 14th Congressional District. In 1998 and 2000 — as volunteer, or while on vacation or on reduced time and pay — I have served as a political consultant to the Re-Elect Ron Paul Committee, the authorized principal campaign committee for Ron Paul's campaigns for re-election to the House from the 14th Congressional District, a seat which he now holds and to which he is currently seeking re-election.

2. In my capacity as political consultant to both authorized principal campaign committees of Ron Paul, I assisted the campaign committees' efforts to raise funds, to plan and execute campaign strategy, and to comply with the rules and regulations of the Federal Election Commission ("FEC"). All of my efforts as a political consultant were undertaken to communicate Ron Paul's political principles and policy positions in such a way as to persuade the people of the 14th Congressional District to vote for Ron Paul to the end that he would be elected and re-elected, and thereby, be placed in a position to forward and implement those principles and policies.

3. The recordkeeping requirements necessitated by the federally-imposed contribution limits and public disclosure rules have created such a serious conflict between the administration of the financial aspect of Ron Paul's campaigns and the conduct of such traditional campaign activities as celebrity rallies, money-raising auctions, and community barbeques, that the campaign committee has been forced to keep such events to a minimum. Additionally, when such events have been held, and attendees have come forward offering contributions to the campaign, many of them are "put off" by the campaign committee's requests for information about their names, addresses, occupations, and employers that is required by law for donors over \$200 in the aggregate during a calendar year. Even after being instructed that it is the law, not the committee, that requires such information, some of these people have been upset with the campaign because of these requirements, and I believe that this has hurt both the campaign's fundraising efforts and the campaign's overall image.

4. In each of the election years in which I have served as a political consultant, I have noticed a number of individual donations in the amounts close to, but under, \$200. On

several occasions I have had opportunity to talk, in confidence, with individuals who have so limited their contributions, and I learned that for a variety of reasons they did not wish their gift to be made public. For example, on one such occasion, a contributor informed me that he did not want his gift disclosed for fear that his wife would find out. I believe that many donors would contribute substantially more than \$200 if their contributions were not made public.

5. In each of the election years in which I have served as a political consultant, the Ron Paul campaign has experienced the following challenge and difficulty: because the main media outlets in the five major media markets in the 14th Congressional District opposed Ron Paul's candidacy, the Paul campaign had to develop alternative means — such as targeted telephone facsimiles, e-mail, radio spots, direct mail, and telephone calls — by which to communicate Ron Paul's message, principles and policies to the public. In contrast to the major media opposition which is exempt from FEC oversight and control, candidate Paul has been — and continues to be — required to raise funds, keep records, and make disclosures to the FEC. Such discriminatory treatment has placed Ron Paul at a competitive disadvantage to his political opponents who have enjoyed the support of the major media in the 14th Congressional District. I know that this competitive disadvantage would be lessened if Ron Paul, like such exempt media in the 14th Congressional District, could raise funds without FEC-imposed limits because a number of donors have indicated to me that they would give more money to the Paul campaigns if they could, and I am certain that such additional funds would enhance the quantity and quality of Ron Paul's campaign communications.

6. Additionally, I know that Ron Paul's ability to persuade the people of the 14th Congressional District to vote for him is lessened by government-mandated contribution limits

and disclosure requirements, because they interfere with his message of limited government and political integrity. By mandating that all candidates meet limitations on campaign contributions and disclosure requirements set by law, Ron Paul is deprived of the liberty (1) to decide to limit individual contributions to his campaign, and (2) to decide whether to disclose some or all of the identities of such contributors. Current campaign finance legislation is based upon political philosophies and practices that are directly contrary to Ron Paul's, and thus deprives him of the opportunity to demonstrate to the people of the 14th Congressional District that he actually puts into practice what he says he believes.

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

  
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THOMAS LIZARDO

Executed on: 10/3/02