

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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REPUBLICAN NATIONAL COMMITTEE,)	
<i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Civ. No. 08-1953 (BMK, RJL, RMC)
)	
FEDERAL ELECTION COMMISSION,)	
<i>et al.</i> ,)	OPPOSITION
)	
Defendants.)	
<hr/>)	

**DEFENDANT FEDERAL ELECTION COMMISSION'S
OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

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Plaintiffs' motion for summary judgment seeks to relitigate the decision in *McConnell v. FEC*, 540 U.S. 93 (2003), upholding Title I of the Bipartisan Campaign Reform Act, which limits the raising and spending of "soft money" by political parties. The record in *McConnell* amply demonstrated that the political parties had raised hundreds of millions of dollars in soft money, circumvented the "hard money" contribution limits, and undermined the Federal Election Campaign Act's ability to prevent corruption and the appearance of corruption. Plaintiffs offer no evidence that *McConnell's* factual basis or reasoning have been undercut by changed circumstances, and the governmental interests recognized by the Supreme Court continue to justify the provisions Plaintiffs challenge. Accordingly, the Court should deny Plaintiffs' motion for summary judgment.

BACKGROUND

More than a century ago, Congress enacted the first campaign finance statute to help ensure that elected leaders shape public policy based on the wishes of their constituents or their best judgment of what serves the national interest, not on the inducements of money. Tillman Act, Ch. 420, 34 Stat. 864 (1907). Since then, Congress has reacted to repeated cycles of scandal and disillusionment with "careful legislative adjustment of the federal electoral laws, in a 'cautious advance, step by step,'" to which the Supreme Court has accorded "considerable deference." *FEC v. Nat'l Right to Work Comm.*, 459 U.S. 197, 209 (1982).

The Federal Election Campaign Act of 1971, 2 U.S.C. §§ 431-55 ("FECA"), is meant to reduce the "opportunities for abuse inherent in a regime of large individual financial contributions," *Buckley v. Valeo*, 424 U.S. 1, 27 (1976) (per curiam), by limiting the size of contributions that may be made to candidates. In light of the central role played by political parties as intermediaries between donors and candidates, *see FEC v. Colorado Republican Fed.*

Campaign Comm., 533 U.S. 431, 451-52 (2001) (“*Colorado II*”), FECA has long imposed limits on contributions made to political party committees. FECA also incorporates previously enacted prohibitions against corporate and labor union spending on federal elections, to prevent unions and corporations from converting their aggregated wealth into political “war chests” that can distort and corrupt democratic processes. 2 U.S.C. § 441b; *see Austin v. Michigan Chamber of Commerce*, 494 U.S. 652, 660 (1990).

Some thirty years after enacting FECA, Congress determined that the statute no longer lived up to its intended purpose and amended it significantly in the Bipartisan Campaign Reform Act of 2002 (“BCRA”), Pub. L. No. 107-155, 116 Stat. 81. In the years leading up to BCRA, political parties, corporations, unions, and other wealthy donors and organizations systematically exploited a breach in FECA’s statutory scheme known as “soft money” — the term used for contributions raised outside the framework of FECA’s source and contribution limits and disclosure requirements. *See McConnell*, 540 U.S. at 122-23. Funds raised pursuant to the source-and-amount limitations are known as “federal funds” or “hard money,” while funds raised outside these limitations — i.e., funds raised from corporate or union sources or in excess of the contribution limits — are known as “non-federal funds” or “soft money.”

The concept of soft money derived from the fact that party committees engage in certain activity in connection with state and local elections that is not necessarily related to federal elections. In practice, however, the parties had raised and spent hundreds of millions of soft dollars for activities that, while purportedly for nonfederal purposes, in reality were intended to support the parties’ candidates for federal office and were indistinguishable from the types of activities that parties and candidates are required to use their hard money to fund. Indeed, in the 2000 election cycle, soft money constituted 42% of the national parties’ total budget. *See*

McConnell, 540 U.S. at 124. The soft money loophole had thus grown from a narrow exception to FECA's limitations into a huge and ever-growing means of circumventing those limitations.

In 1998, after an extensive investigation, the Senate Committee on Governmental Affairs issued a report detailing the influence that soft money had come to wield in the electoral process. *Id.* at 129; S. Rep. No. 105-167 (1998). The report concluded that the parties' ability to solicit and spend soft money had destroyed FECA's source-and-amount limitations. *See McConnell*, 540 U.S. at 129-32. The report also noted that state and local parties had played a crucial role in the soft-money system, as the national parties had made a practice of transferring funds to the state and local parties to conduct putatively non-federal activities "that in fact ultimately benefit[ed] federal candidates." *Id.* at 131 (quoting S. Rep. 105-167 at 4466 (alteration in original)). In sum, the national, state, and local political parties, as well as federal candidates themselves, had all become players in a system that was designed to evade FECA's contribution limits and that permitted large and corporate donors the corrupting influence of which FECA was intended to deprive them.

In response to the conduct detailed in the Senate report and elsewhere, Congress enacted BCRA: "the most recent federal enactment designed 'to purge national politics of . . . the pernicious influence of "big money" campaign contributions.'" *McConnell*, 540 U.S. at 115 (quoting *United States v. Automobile Workers*, 352 U.S. 567, 572 (1957)). Title I of BCRA, entitled "Reduction of Special Interest Influence," closed the soft-money loophole. Specifically, BCRA section 101(a) prohibited national political parties and their officers from soliciting, receiving, or disbursing soft money. BCRA § 101(a) (codified at 2 U.S.C. § 441i(a)); *McConnell*, 540 U.S. at 133 ("[Section 101(a)] takes national parties out of the soft-money business."). The statute imposes no limits on how the national party committees may spend their

money; it simply requires that all money spent by the national parties must be raised in accordance with FECA's longstanding requirements. At the same time, Congress substantially raised the limits on contributions of hard money to national party committees and indexed those limits for inflation, making it easier for those committees to raise hard money.¹

Other provisions in Title I are carefully drawn to complement the national party soft money ban by eliminating additional existing and potential loopholes involving, among others, state, district, and local party committees ("state and local" party committees). As Congress recognized, state and local party committees had been a primary vehicle through which the national parties had circumvented FECA. The national parties had transferred millions of dollars in soft money to their state and local counterparts, which had used those funds largely to support federal election activity, and under fewer restrictions than were applicable to the national parties. Title I prevents those committees from continuing the same abuse of soft money that the national parties had accomplished. Thus, with one important exception,² BCRA section 101(b) also prohibits state and local parties from receiving soft money for "federal election activity."

2 U.S.C. § 441i(b).

Federal election activity, in relevant part, is defined as:

¹ As of the 2009-2010 election cycle, the individual contribution limits had been raised to \$2,400 per election per candidate, \$30,400 per national party per year, and \$115,500 in the aggregate for the two-year election cycle. See FEC, *Contribution Limits 2009-2010*, <http://www.fec.gov/pages/brochures/contriblimits.shtml> (last visited Mar. 9, 2009). Corporations and unions may not make contributions or expenditures except through their "separate segregated funds." See 2 U.S.C. §§ 431(4)(B), 441b(b).

² In the "Levin Amendment," Congress provided an exception to the requirement that state and local parties spend only federal funds for certain "Federal election activity." See *McConnell*, 540 U.S. at 162-64; 2 U.S.C. § 441i(b)(2); 11 C.F.R. §§ 300.2(i), 300.31, 300.32. Under the Amendment, the federal election activity described in 2 U.S.C. § 431(20)(A)(i) & (ii) can be financed by state and local party committees with either federal funds or a combination of federal and "Levin funds." Individuals can donate as much as \$10,000 per year in Levin funds to a state or local political party.

- (i) voter registration activity during the period . . . 120 days before . . . a regularly scheduled Federal election . . . ;
- (ii) voter identification, get-out-the-vote activity, or generic campaign activity³ conducted in connection with an election in which a candidate for Federal office appears on the ballot (regardless of whether a candidate for State or local office also appears on the ballot); [or]
- (iii) a public communication that refers to a clearly identified candidate for Federal office . . . and that promotes or supports . . . or attacks or opposes a candidate for that office (regardless of whether the communication expressly advocates a vote for or against a candidate)

2 U.S.C. § 431(20)(A)(i)-(iii). Through these provisions, BCRA eliminated the receipt of soft money by national political party committees and the receipt of soft money by state and local parties for federal election activity. State and local parties remain free to receive funds under applicable state and local law for all other activities, and all political parties remain free to spend an unlimited amount of hard money for any activity.

Immediately after BCRA was passed, eleven complaints challenging the Act's constitutionality were filed in this Court. One such complaint was *Republican National Committee v. FEC*, which named as plaintiffs the RNC, Mike Duncan, and several state and local party affiliates. *Republican Nat'l Comm. v. FEC*, Compl., Civ. No. 02-874 (D.D.C. filed May 7, 2002); *see also McConnell v. FEC*, 251 F. Supp. 2d 176, 220, 225 (D.D.C. 2003). Together, the complaints challenged, *inter alia*, the constitutionality of BCRA Title I's prohibition on federal parties' receipt of soft money and state and local parties' receipt of soft money to engage in federal election activity.

³ "Generic campaign activity" is "campaign activity that promotes a political party and does not promote a candidate or non-Federal candidate." 2 U.S.C. § 431(21).

All of the BCRA complaints were consolidated before this Court with *McConnell v. FEC*, Civ. No. 02-582 (D.D.C.). When the case reached the Supreme Court, it upheld BCRA Title I in its entirety. *See McConnell*, 540 U.S. at 188-89. The Court held that BCRA section 101(a) was constitutional because “there [was] substantial evidence to support Congress’ determination that large soft-money contributions to national political parties give rise to corruption and the appearance of corruption,” *id.* at 154, and that the state and local party limits were also “closely drawn to match the important governmental interests of preventing corruption and the appearance of corruption,” *id.* at 173. The Court observed, *inter alia*, that “all large soft-money contributions to national parties [were] suspect.” *McConnell*, 540 U.S. at 155.

ARGUMENT

While framed as an as-applied challenge, Plaintiffs’ claims in this action seek to revisit the Supreme Court’s conclusion in *McConnell* that BCRA’s limits on soft money are constitutional. Plaintiffs attempt to create the illusion that “soft money” is qualitatively different from hard money, and that they have a constitutional right to raise unlimited contributions. But money is fungible, and in fact, soft money is nothing more than a donation that exceeds FECA’s contribution limits or comes from a source that the statute prohibits. Congress, therefore, was amply justified in placing an effective limit on contributions made to party committees whose activities influence federal elections. This Court should reject Plaintiffs’ attempt to turn back the clock to FECA’s pre-BCRA state.

I. STANDARD OF REVIEW

Summary judgment is appropriate when “the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a

matter of law.” Fed. R. Civ. P. 56(c); *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986); *Diamond v. Atwood*, 43 F.3d 1538, 1540 (D.C. Cir. 1995). The Court must view the record in the light most favorable to the party opposing the motion, giving the non-movant the benefit of all favorable inferences that can reasonably be drawn from the record and the benefit of any doubt as to the existence of any genuine issue of material fact. *Defenders of Wildlife v. Dep’t of Agric.*, 311 F. Supp. 2d 44, 53 (D.D.C. 2004) (citing *Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 157-59 (1970)).

II. BCRA’S SOFT MONEY RESTRICTIONS FUNCTION AS CONTRIBUTION LIMITS AND ARE SUBJECT TO INTERMEDIATE SCRUTINY

As Plaintiffs concede (Pls.’ Br. 17), *McConnell* understood Title I’s soft money restrictions as limits on contributions, not expenditures, and thus employed intermediate scrutiny when it upheld them. The same provisions are at issue here and warrant the same level of scrutiny.

The Supreme Court has repeatedly rejected the kind of argument Plaintiffs make here, i.e., that a contribution limit should be scrutinized as an expenditure limit because it may reduce the total funds an organization has available to spend on particular kinds of activity. In *Buckley*, the Court explained that the “overall effect of the Act’s contribution ceilings is merely to require candidates and political committees to raise funds from a greater number of persons and to compel people who would [have] otherwise contribute[d] amounts greater than the statutory limits to expend such funds on direct political expression.” 424 U.S. at 21-22. In *McConnell*, when determining the appropriate level of scrutiny, the Court found it irrelevant that BCRA’s soft money provisions prohibit national political parties from both receiving and spending nonfederal money and limit state and local parties’ spending of soft money for certain federal election activity. The Court observed that “neither provision in any way limits the total amount

of money parties can spend. Rather, they simply limit the source and individual amount of donations.” 540 U.S. at 139 (citation omitted). Thus, “for purposes of determining the level of scrutiny, it is irrelevant that Congress chose . . . to regulate contributions on the demand rather than the supply side.” *Id.* at 138 (citing *Nat’l Right to Work Comm.*, 459 U.S. at 206-11). Instead, the determinative factor is whether the provision creates any burden on speech that would be greater than a simple, direct limit on contributions:

The relevant inquiry is whether the mechanism adopted to implement the contribution limit, or to prevent circumvention of that limit, burdens speech in a way that a direct restriction on the contribution itself would not. That is not the case here.

Id. at 138-39.

Unlike a “limitation upon expenditures for political expression, a limitation upon the amount that any one person or group may contribute to a candidate or political committee entails only a marginal restriction upon the contributor’s ability to engage in free communication.” *Buckley*, 424 U.S. at 20. Contribution limits leave contributors free to become members of associations and assist with their various efforts on behalf of candidates, and also “to assist to a limited but nonetheless substantial extent in supporting candidates and committees with financial resources.” *Id.* at 28. As a result, the Court has concluded that “contribution limits impose serious burdens on free speech only if they are so low as to ‘preven[t] candidates and political committees from amassing the resources necessary for effective advocacy.’” *McConnell*, 540 U.S. at 135 (quoting *Buckley*, 424 U.S. at 21). Thus, a contribution limit is valid if it satisfies the “lesser demand” of being “closely drawn” to match a “sufficiently important

interest.” *Nixon v. Shrink Mo. Gov’t PAC*, 528 U.S. 377, 387-88 (2000); *FEC v. Beaumont*, 539 U.S. 146, 162 (2003); *see also Buckley*, 424 U.S. at 25.⁴

Plaintiffs do not challenge the current \$30,400 limit on hard money contributions to national parties (*see supra* p. 4 n.1),⁵ but only its application to donations made to national parties ostensibly for certain purposes. The premise of the underlying contribution limit, however, is that large contributions to a party may influence the conduct of officeholders affiliated with that party. Once the validity of that premise is conceded, Congress is entitled to considerable deference in deciding whether donations purportedly made for nonfederal purposes should be exempted from the limits, or whether those donations also create an unacceptable risk of actual or apparent corruption of officeholders. The Court’s ultimate task, then, is to determine whether the contribution limits are “so radical in effect as to render political association ineffective” for the parties. *Shrink Missouri*, 528 U.S. at 397. The political parties thrived

⁴ Contrary to Plaintiffs’ suggestion (Pls.’ Br. 29), the provisions they challenge do not “prohibit[]” any campaign activities. The Supreme Court’s application of strict scrutiny in *FEC v. Wisconsin Right to Life, Inc.*, 127 S. Ct. 2652 (2007), is thus irrelevant here, because that case involved 2 U.S.C. § 441b, a direct prohibition on independent corporate campaign spending that does not function as a contribution limit. Plaintiffs’ further suggestion (*see* Pls.’ Br. 17 n.14) that this Court should overturn the applicable standard of review, is unjustifiable. *Thurston Motor Lines, Inc. v. Jordan K. Rand, Ltd.*, 460 U.S. 533, 535 (1983) (“[O]nly [the Supreme] Court may overrule one of its precedents.”). Plaintiffs’ reliance (Pls.’ Br. 18) on *Citizens Against Rent Control v. City of Berkeley*, 454 U.S. 290 (1981), is also misplaced. That case, which involved a municipal restriction on contributions to a ballot measure committee, is clearly distinguishable from the long line of cases applying lesser scrutiny to contribution limits involving candidate elections. In *First National Bank of Boston v. Bellotti*, 435 U.S. 765, 790 (1978), the Court explained that that the “risk of corruption perceived in cases involving candidate elections . . . simply is not present in a popular vote on a public issue.” Indeed, the Court later quoted this very passage in *Citizens Against Rent Control* when it continued to rely on the distinction between limits involving candidate elections and those involving ballot measures. 454 U.S. at 298.

⁵ Notably, this is much greater than the \$5,000 limit on contributions an individual can give to other political committees (i.e., PACs). 2 U.S.C § 441a(a)(1).

before they began accepting hundreds of millions of dollars in soft money contributions, they have done so after BCRA's effective date, and there is no basis for finding that they will not continue to do so if Plaintiffs' claims are rejected. (*See* Def. FEC's Statement of Genuine Issues ("FEC Fact Resp.") ¶ 23 (noting that RNC has engaged in activities at issue since BCRA was enacted).)

III. *McCONNELL'S HOLDING THAT TITLE I IS CONSTITUTIONAL REGARDLESS OF HOW THE NATIONAL POLITICAL PARTIES SPEND THEIR FUNDS IS DISPOSITIVE HERE*

McConnell rejected the premise of Plaintiffs' case — that political parties should be able to raise soft money as long as they will spend it on activities that, in their view, do not sufficiently influence federal elections. 540 U.S. at 138-39, 154-56. The Court's reasoning and holding are dispositive here:

Plaintiffs and THE CHIEF JUSTICE contend that [section 101(a)] is impermissibly overbroad because it subjects *all* funds raised and spent by national parties to FECA's hard-money source and amount limits, including, for example, *funds spent on purely state and local elections in which no federal office is at stake*. Such activities, THE CHIEF JUSTICE asserts, pose "little or no potential to corrupt . . . federal candidates and officeholders." This observation is beside the point. Section [101(a)], like the remainder of [§ 101], regulates contributions, not activities. As the record demonstrates, it is the close relationship between federal officeholders and the national parties, as well as the means by which parties have traded on that relationship, that have made *all large soft-money contributions* to national parties suspect.

McConnell, 540 U.S. at 154-55 (second and third emphases added; footnote and citations omitted). In making these points, the Court explicitly acknowledged that 30% of the nonfederal funds the RNC had raised in 2001 was spent on "purely state and local election activity." *Id.* at 154 n.50. Despite this fact, the Court found the ban on all soft-money contributions justified by the extensive evidence demonstrating the influence that soft-money donors to the national parties wielded over the federal officeholders affiliated with those parties. *See id.* at 150; *see generally*

id. at 143-54. The Court therefore upheld the soft-money prohibition, finding that “large soft-money contributions to national political parties give rise to corruption and the appearance of corruption,” *id.* at 154 — regardless of how the money is spent.

The Court then addressed the prohibition on officers of national parties soliciting soft money for state and local parties, 2 U.S.C. § 441i(a)(2), one of the provisions that Duncan challenged in *McConnell* and again contests here. Rejecting Duncan’s claim, the Court held that the prohibition on officer solicitation “follows sensibly from the prohibition on national committees’ receiving soft money.” *McConnell*, 540 U.S. at 157-58. Thus, the Court held that the officer solicitation prohibition was constitutional for the same reasons as the national party prohibition. *Id.*

The Court further held that prohibiting state and local parties from receiving soft money for “federal election activity,” 2 U.S.C. §§ 431(20), 441i(b), was a necessary corollary to the national party soft-money ban. *McConnell*, 540 U.S. at 161. The Court noted the evidence that the national limit would be “wholly ineffective” without the state and local limit, *id.* at n.53 (internal quotation mark omitted), and so held that the latter “promotes an important governmental interest by confronting the corrupting influence that soft-money donations to political parties already have.” *Id.* at 165; *see also id.* at 156 n.51 (“close relationship” between federal officeholders and state and local party committees makes those parties “effective conduits for donors desiring to corrupt federal candidates and officeholders”). Accordingly, the Court upheld the state and local limit on the grounds that “[p]reventing corrupting activity from shifting wholesale to state committees and thereby eviscerating FECA clearly qualifies as an important governmental interest.” *Id.* at 165-66.

In reaching that conclusion, the Court discussed the state and local parties' contention that some conduct meeting the "federal election activity" statutory definition is activity relating only to state and local elections. *See id.* at 166-68. Rejecting this contention, the Court found that the statutory definition of "federal election activity" — particularly "voter registration, voter identification, GOTV, and generic campaign activity" — "clearly capture[s] activity that benefits federal candidates" and that "funding of such activities creates a significant risk of actual and apparent corruption." *Id.* at 167-68. The Court held that section 101(b) "is a reasonable response to that risk," and therefore constitutional. *Id.*

Finally, the Court addressed the state and local parties' arguments regarding the prohibition on receiving soft money for advertising that promotes, attacks, supports, or opposes a federal candidate. 2 U.S.C. § 431(20)(A)(iii). The Court found that, as to the substantial influence of such advertising on federal elections, "[t]he record on this score could scarcely be more abundant." *McConnell*, 540 U.S. at 169-70. Because the evidence regarding such influence was clear, the Court held that the statutory limit is "closely drawn to the anticorruption interest it is intended to address," *id.*, and does not unconstitutionally limit state and local parties' "ability to engage in effective advocacy," *id.* at 173.

Although Plaintiffs style their case as an as-applied challenge, their various counts cover numerous *categories* of activity, and these activities were at the heart of Plaintiffs' case in *McConnell*. There, both their factual allegations and legal arguments relied heavily on these same kinds of activities in Plaintiffs' failed attempt to convince the courts that Title I unconstitutionally infringed their rights by regulating activity that was not sufficiently connected to federal elections. (*See* Def. FEC's Mem. in Supp. of Mot. to Dismiss (Docket No. 20) at 12-15.) Thus, when *McConnell* rejected Plaintiffs' arguments, the Court clearly understood

these kinds of disbursements would have to be financed under the new BCRA rules. *McConnell* did not, of course, decide as-applied challenges that were not before it. See *Wisconsin Right to Life, Inc. v. FEC*, 546 U.S. 410 (2006). But the *reasoning* used by the Court in *McConnell* rejecting the facial challenge to Title I is inconsistent with Plaintiffs' *particular* as-applied challenge here.⁶

IV. THE RISK OF CORRUPTION FROM UNLIMITED SOFT MONEY CONTRIBUTIONS JUSTIFIES BCRA'S LIMITS AS APPLIED TO PLAINTIFFS

A. Background: The Constitution Was Designed to Limit the Power of Political Parties, and Corruption Involving Political Parties Later Helped Instigate the Enactment of the Campaign Finance Laws

Far from giving political parties special constitutional rights, the Constitution's Framers consciously created a constitutional framework designed to restrain the power of political parties because they viewed parties as a potential threat to representative governance. "Partisan politics bears the imprimatur only of tradition, not the Constitution." *Elrod v. Burns*, 427 U.S. 347, 369 n.22 (1976) (plurality). Commenting on the political beliefs of leaders like Washington, Adams, Madison, Hamilton, and Jefferson, the historian Richard Hofstadter has written:

⁶ When the Court in *McConnell* left open the possibility for some as-applied challenges to Title I, it did not suggest that any such challenge would be successful based on the nature of the disbursements that parties wished to make with soft-money donations. Regarding state and local parties, the Court found it "largely inconsequential" that BCRA might reduce the money available to them; rather, the relevant question was whether the impact of the new provisions "is 'so radical in effect as to . . . drive the sound of [the recipient's] voice below the level of notice.'" 540 U.S. at 173 (quoting *Shrink Missouri*, 528 U.S. at 397). In responding to the argument that some state laws might make it impossible for state and local candidates to receive hard-money donations at all, the Court stated, "[t]he fact that a handful of States might interfere with the mechanism Congress has chosen for such solicitations is an argument that may be addressed in an as-applied challenge." *Id.* at 157 n.52. The Court also noted that a "nascent or struggling minor party can bring an as-applied challenge if § 323(a) prevents it from 'amassing the resources necessary for effective advocacy.'" *Id.* at 159 (quoting *Buckley*, 424 U.S. at 21). None of these types of as-applied challenges identified in *McConnell* turn on how donations are spent.

If there was one point of political philosophy upon which these men, who differed on so many things, agreed quite readily, it was their common conviction about the baneful effects of the spirit of party.

Richard Hofstadter, *The Idea of a Party System* at 3 (1970).

Alexander Hamilton was among those who agreed that the elimination of parties was a possible goal in a well-designed and well-run state. “We are attempting by this Constitution,” he said to the New York ratifying convention in 1788, “to abolish factions, and to unite all parties for the general welfare.”

Id. at 17; see also *The Federalist*, No. 85 (Hamilton) at 521 (Rossiter ed., 1961). George Washington warned that although political parties can play a useful role, if their power is not checked they can destroy the government through corruption: “I have already intimated to you the danger of parties in the State. . . . It opens the door to foreign influence and corruption, which find a facilitated access to the government itself through the channels of party passion.” G. Washington, *Farewell Address*, reprinted in *Documents of American History*, 169, 172 (H. Commager ed. 1946).

These concerns led the framers to structure the Constitution to try to minimize the influence of parties.

[T]he authors of the Constitution set up an elaborate division and balance of powers within an intricate governmental structure designed to make parties ineffective. It was hoped that the parties would lose and exhaust themselves in futile attempts to fight their way through the labyrinthine framework of the government This is the antiparty part of the constitutional scheme. To quote Madison, the “great object” of the Constitution was “to preserve the public good and private rights against the danger of such a faction [party] and at the same time to preserve the spirit and form of popular government.”

E.E. Schattschneider, *Party Government*, at 7 (1942) (citing *The Federalist*, No. 10 (Madison); alteration by Schattschneider). “[T]he Fathers hoped to create not a system of party government under a constitution but rather a constitutional government that would check and control parties.”

Hofstadter, at 53. Therefore, although political parties have come to play an important role in the nation's democracy, which justifies Congress's decision to give them certain special advantages (*see, e.g.*, 2 U.S.C. § 441a(d)), there is no basis for concluding that the Constitution forecloses reasonable limits on contributions to the parties.

In the late 19th and early 20th centuries, concerns about corruption and political parties led to the first efforts to regulate campaign finance. After the Civil War, great aggregations of wealth amassed during the industrial revolution flooded the parties, which in turn used their officeholders to satisfy the parties' contributors. Congress responded to this perceived threat to democracy with its first efforts to regulate campaign financing, beginning in 1907 with the Tillman Act. Fifty years later, the Supreme Court in *Automobile Workers* reviewed the history of these initial legislative efforts. After explaining that the "concentration of wealth consequent upon the industrial expansion in the post-Civil War era had profound implications for American life," 352 U.S. at 570, the Court focused on the corruption associated with political parties' becoming indebted to their large contributors. The Court quoted Elihu Root's speech of 1894, where he stated, "I believe that the time has come when something ought to be done to put a check to the giving of \$50,000 or \$100,000 by a great corporation toward political purposes upon the understanding that *a debt is created from a political party to it.*" *Id.* at 571 (emphasis added; citations omitted). In 1906, the Court continued, the "feeling of articulate reform groups was reflected at a public [congressional] hearing," by one leader who explained: "[T]his thing has come to the breaking point. We have had enough of it. We don't want any more secret purchase of organizations, which nullifies platforms, nullifies political utterances and the pledges made by political leaders in and out of Congress." *Id.* at 573 (citation omitted); *see also id.* at 577-78 ("We all know that large contributions to political campaigns . . . put the political party under

obligation to the large contributors, who demand pay in the way of legislation”) (quoting Senator Bankhead).

B. Even If They Do Not Solicit Soft Money Donations Themselves, Officeholders Can Become Obligated to Large Donors to Their Parties

Relying on *Automobile Workers* and other cases, *McConnell* recounted much of the above history, 540 U.S. at 115-17, and specifically noted the “special relationship and unity of interest” between national parties and federal candidates and officeholders, *id.* at 145. “This close affiliation has placed national parties in a unique position, ‘*whether they like it or not, to serve as ‘agents for spending on behalf of those who seek to produce obligated officeholders.’*” *Id.* (quoting *Colorado II*, 533 U.S. at 452) (emphasis added). Although the Court noted the role that officeholders had played in raising soft money for their political parties, the Court also found that, “[e]ven when not participating directly in the fundraising, federal officeholders were well aware of the identities of the donors: National party committees would distribute lists of potential or actual donors, *or donors themselves would report their generosity to officeholders.*” *Id.* at 147 (emphasis added). “[F]or a member not to know the identities of these donors, he or she must actively avoid such knowledge as it is provided by the national political parties *and the donors themselves.*” *Id.* (quoting *McConnell*, 251 F. Supp. 2d at 487-88) (Kollar-Kotelly, J.) (emphasis added); *see also id.* (citing *McConnell*, 251 F. Supp. 2d at 853-55 (Leon, J.)). Thus, Plaintiffs’ alleged intentions (*e.g.*, Pls.’ Br. 6) not to involve officeholders directly in raising soft money is of no functional or constitutional significance; Plaintiffs provide no evidence that would suggest that donors themselves would suddenly remain quiet about their own generosity.

At some point, an outside interest group’s contributions to a political party and its candidates can become large enough to engender an overall sense of indebtedness from the party and its officeholders, regardless of the specific contributions any single Member of Congress

may have received. The Supreme Court found that “[t]he evidence connects soft money to manipulations of the legislative calendar, leading to Congress’ failure to enact, among other things, generic drug legislation, tort reform, and tobacco legislation.” 540 U.S. at 150 (citations omitted). For example, as former Senator Simon explained:

It is not unusual for large contributors to seek legislative favors in exchange for their contributions. A good example of that which stands out in my mind because it was so stark and recent occurred on the next to last day of the 1995-96 legislative session. Federal Express wanted to amend a bill being considered by a Conference Committee This was clearly of benefit to Federal Express, which according to published reports had contributed \$1.4 million in the last 2-year cycle to incumbent Members of Congress and almost \$1 million in soft money to the political parties. I opposed this in the Democratic Caucus, arguing that even if it was good legislation, it should not be approved without holding a hearing, we should not cave in to special interests. One of my senior colleagues got up and said, “I’m tired of Paul always talking about special interests; we’ve got to pay attention to who is buttering our bread.” I will never forget that. This was a clear example of donors getting their way, not on the merits of the legislation, but just because they had been big contributors. I do not think there is any question that this is the reason it passed.

McConnell, 251 F. Supp. 2d at 482 (Kollar-Kotelly, J.).⁷ After reviewing evidence like this, the Court in *McConnell* rejected a “crabbed view of corruption” and instead embraced “common

⁷ “Once elected to legislative office, public officials enter an environment in which political parties-in-government control the resources crucial to subsequent electoral success and legislative power. Political parties organize the legislative caucuses that make committee assignments.” *McConnell*, 540 U.S. at 156 (quoting Expert Report of Donald P. Green, Yale University). Thus “officeholders’ reelection prospects are significantly influenced by attitudes of party leadership,” *id.* (citation omitted), and an individual Member’s stature and responsibilities vary dramatically depending on whether his party is in the majority or in the minority. *See* Green Rept. at 8 [DEV 1-Tab 3]. (“DEV” and “Tab” cites refer to the volumes and tab numbers of Defendants’ Exhibit Volumes submitted to this Court in *McConnell*. Copies of non-confidential exhibits are contemporaneously being filed on DVD, with courtesy copies to Chambers.) Party officials both inside and outside Congress will naturally seek to cultivate an attitude that each party member has an important stake in the success of the larger organization. It was thus reasonable for Congress and the Supreme Court to conclude that a Member of Congress is likely to look favorably upon his party’s large-scale benefactors, and that substantial contributions to the party will therefore create risks of “undue influence on an officeholder’s judgment, and the appearance of such influence,” *McConnell*, 540 U.S. at 150 (citing *Colorado*

sense, . . . the realities of political fundraising,” and the need to prevent corruption and the “appearance of corruption.” 540 U.S. at 152. In particular, the Court rejected the notion that only a “direct contribution to the candidate” can “threaten to create . . . a sense of obligation” from a candidate to a donor, *id.* at 144, or that only “contributions made at the express behest of” a candidate created a concern about corruption, *id.* at 152. Rather, the Court explained that persons seeking influence with officeholders and candidates have shown a history of exploiting loopholes in the Act, and that indirect attempts to use money to gain influence can create actual corruption, or the appearance of corruption, that can justify congressional efforts to protect the integrity of the democratic process. *See generally id.* at 143-154.⁸

Moreover, despite Plaintiffs’ alleged plans not to return to all of the pre-BCRA fundraising practices, the record in *McConnell* makes clear that “[m]any in the corporate world view large soft money donations as a cost of doing business.” *Id.* at 147 n.46 (citation and quotation marks omitted). Indeed, the record was replete with evidence that big donors gave largely to secure influence, not for ideological reasons — a fact proven most pointedly by the pattern of top donors’ giving to *both* major national parties. *Id.* at 148.⁹ Often this giving was

II, 533 U.S. at 441), similar to those posed by a sizeable contribution to the candidate himself. Plaintiffs concede (Pls.’ Br. 40), for example, that the RNC’s chairman will be grateful to soft money donors, but provide no plausible reason why its officeholders would not share that sense of gratitude.

⁸ As the Supreme Court has made clear, avoiding the appearance of corruption is an important governmental interest; if the government leaves “the perception of impropriety unanswered,” the “cynical assumption that large donors call the tune could jeopardize the willingness of voters to take part in democratic governance. Democracy works only if the people have faith in those who govern, and that faith is bound to be shattered when high officials and their appointees engage in activities which arouse suspicions of malfeasance and corruption.” *Shrink Missouri*, 528 U.S. at 390 (internal citation and quotation marks omitted).

⁹ *See, e.g., McConnell*, 540 U.S. at 147 n.46 (many corporate donors “view large soft money donations as a cost of doing business”) (quoting Hasbro CEO Alan Hassenfeld); Bumpers Decl. ¶¶ 18-23 [DEV 6-Tab 10] (explaining that soft money donations can buy access to officeholders and get phone calls to officeholders returned, and that there is often “an

not in response to particular solicitations, but made at the suggestion of professional lobbyists as part of a broader plan to obtain influence. As lobbyist Daniel Murray explained (emphasis added),

I advise my clients as to which federal office-holders (or candidates) they should contribute and in what amounts, in order to best use the resources they are able to allocate to such efforts to advance their legislative agenda. *Such plans also would include soft money contributions to political parties and interest groups associated with political issues.*

McConnell, 251 F. Supp. 2d at 495 (Kollar-Kotelly, J.); *see also id.* (“To have true political clout, the giving and raising of campaign money for candidates and political parties is often critically important.”) (quoting lobbyist Wright Andrews).

Nothing in Plaintiffs’ allegations or evidence suggests that Plaintiffs could or would do anything to change the behavior of lobbyists. When the Supreme Court discussed the “evidence in the record showing that national parties have actively exploited the belief that contributions purchase influence or protection to pressure donors into making contribution,” it quoted the statement of a CEO who specifically referred to heavy-handed solicitations by lobbyists.

McConnell, 540 U.S. at 148 n.47. If a corporation had given a lot of money to one side, the CEO explained, “the other side,” i.e., the opposing national party committee, might have “a friendly

expectation of reciprocation where donations to the party are made”); Simpson Decl. ¶¶ 8-12 [DEV 9-Tab 38] (“Big labor and big business use large soft money donations to corrupt the system to the detriment of the little guy”; “[l]arge donors of both hard and soft money receive special treatment”; recounting instances in which Senators’ votes and legislative priorities were affected by fear of losing future donations); *McConnell*, 251 F. Supp. 2d at 496 (Kollar-Kotelly, J.) (“Large soft money contributions in fact distort the legislative process. They affect what gets done and how it gets done.”) (quoting Senator Rudman); *id.* at 484-85 (poll of senior executives shows that pressure is placed on business leaders to make large contributions, and that main reasons such contributions are made are fear of adverse legislative consequences and to obtain access to lawmakers); Hickmott Decl. ¶ 9 [DEV 6-Tab 19] (“[C]orporations, labor unions and individuals make soft money contributions to national political parties and federal candidate PACs, including joint fundraising committees, to influence the legislative process for their business purposes.”).

lobbyist call and indicate that someone with interests before a certain committee has had their contributions to the other side noticed.” *Id.* (quoting Wade Randlett). Thus, if Plaintiffs prevail, lobbyists will have every incentive to again raise soft money and advise their clients to make large soft money donations to the political parties. These incentives are strong and exist independent of any solicitations that parties or officeholders may make.

The amount of influence that a lobbyist has is often directly correlated to the amount of money that he or she and his or her clients infuse into the political system. . . . Those who are most heavily involved in giving and raising campaign finance money are frequently, and not surprisingly, the lobbyists with the most political clout.

Id. at 495 (Kollar-Kotelly, J.), 869-70 (Leon, J.) (quoting Andrews). None of this predictable behavior would be quelled by the absence of officeholders from direct fundraising.

Even when solicitations are made by party officials rather than officeholders, the solicitations can place tremendous pressure on prospective donors. Solicitations from party leaders are potentially coercive because party leaders are so closely connected to federal officeholders. *See* McCain Decl. ¶ 21 [DEV 8-Tab 29]. The Thompson Committee, for example, found that Clinton Administration Deputy White House Chief of Staff Harold Ickes “ran the DNC on a day-to-day basis,” that he reported its fundraising and expenditures to the President and the Vice President, and that the DNC’s national chairman, Don Fowler, was effectively subordinate to Ickes. S. Rep. No. 105-167 at 34; *see also* Kolb Decl. Exh. 6 at 4 [DEV 7-Tab 24] (51% of corporate executives surveyed agreed that “many business executives fear adverse legislative consequences to themselves or their industry if they turn down requests for campaign contributions from high-ranking political leaders and/or political operatives”).

The “party’s involvement does not sterilize the system” because “[e]lected officials know exactly who the big party contributors are.” Rudman Decl. ¶ 12 [DEV 8-Tab 34]; *accord*

Simpson Decl. ¶ 5 [DEV 9-Tab 38]; Greenwald Decl. ¶ 11 [DEV 6-Tab 16]. Donation patterns were well-known or easily ascertainable by party officials, officeholders, staff, and opposing lobbyists, through FEC reports or other means. *See McConnell*, 540 U.S. at 148 n.47; 251 F. Supp. 2d at 487 (Kollar-Kotelly, J), (“[T]here is communication among Members about who has made soft money donations and at what level they have given, and this is widely known and understood by the Members and their staff.”) (quoting CEO Wade Randlett); *id.* at 487 (Kollar-Kotelly, J), 853-54 (Leon, J.) (“[Y]ou cannot be a good Democratic or a good Republican Member and not be aware of who gave money to the party.”) (quoting Senator Bumpers); *id.* at 487-88 (Kollar-Kotelly, J), 854 (Leon, J.) (“Legislators of both parties often know who the large soft money contributors to their parties are.”) (quoting Senator McCain); *id.* at 487-88 (Kollar-Kotelly, J), 854 (Leon, J.) (donor’s “lobbyist informs the Senator that a large donation was just made”) (quoting Senator Boren). Congressional staffers also know the identities of the big soft money donors. *See id.* at 482 (“Staffers who work for Members know who the big donors are, and those people always get their phone calls returned first and are allowed to see the Member when others are not.”) (quoting Senator Simpson). Thus, “[p]arty committees do not so much dilute and ‘cleanse’ private interest money as centralize it and focus it on the President and the congressional leadership.” Richard Briffault, *The Political Parties and Campaign Finance Reform*, 100 COLUM. L. REV. 620, 651 (2000); *see also Colorado II*, 533 U.S. at 455 (“[P]arties continue to organize to elect candidates, and also function for the benefit of donors whose object is to place candidates under obligation, a fact that parties cannot escape.”). These concerns about the national parties are equally acute for the state and local parties.

“[T]he federal candidates who benefit from state party use of these funds will know exactly whom their benefactors are; the same degree of beholdenness and obligation will arise; the same distortions on the legislative process will occur; and the same public cynicism will erode the

foundations of our democracy — except it will all be worse in the public’s mind because a perceived reform was undercut once again by a loophole that allows big money into the system.”

McConnell, 540 U.S. at 165 (quoting Senator Rudman).¹⁰

Plaintiffs’ fundraising procedures ensure that this knowledge of donors’ largesse will continue in the future. Plaintiffs frequently arrange meetings, receptions, dinners, and other events, at which their major donors mingle with federal candidates and officeholders, from candidates for the House of Representatives to the sitting President of the United States. (FEC Fact Resp. ¶ 24.) An attending donor has an opportunity to inform these federal candidates and officeholders about the donor’s opinion on legislation or issues. (*Id.*) Because only major donors attend these events (the public at large is not invited), the candidates and officeholders who attend know that, by definition, each attendee who expresses such an opinion has given a significant sum to the party. (*Id.*) Furthermore, Plaintiffs’ organizational structure ensures that federal officeholders have access to information regarding large donations. “[T]he role of the RNC is to be a political arm of Republicans either seeking office or in office” (FEC Fact Resp. ¶ 1 (quoting Josefiak Dep. 197:1-18)), and so the RNC is “inextricably intertwined with federal officeholders and candidates” (*id.* (quoting *McConnell*, 540 U.S. at 155)). The CRP and RPSD reserve positions in their leadership structures for federal officeholders (*id.* ¶¶ 2-3), positions in

¹⁰ Plaintiffs contend (Pls.’ Br. 26 n.16) that BCRA does not reduce the appearance of corruption because trust in government has remained low subsequent to its passage. Even assuming that BCRA has not single-handedly been able to boost confidence in government, however, such measurements were only a subset of the public opinion evidence presented in *McConnell*, and Plaintiffs do not make any effort to call into question the more specific findings that contributions above the federal limits appear corrupt to broad majorities of the American public. *See, e.g., McConnell*, 251 F. Supp. 2d at 512-14, 517 (Kollar-Kotelly, J.). Recent polls continue to confirm that the public generally believes that federal officeholders can be influenced by large contributions. *See, e.g., Rasmussen Reports, Most Say Political Donors Get More Than Their Money’s Worth*, Feb. 9, 2009 (FEC Exh. 25) (majority believes member of Congress can be influenced by contributions of \$50,000 or less).

which these officeholders learn of large donations as a matter of course (*id.* ¶ 24). Given these procedures and interlocking arrangements, federal candidates and officeholders will inevitably know who the respective parties' largest donors are — the same donors who have frequent opportunities, not open to others, to ask federal candidates and officeholders to take action in accordance with the donors' views.

Finally, Plaintiffs do not suggest that their officeholders will cease raising hard money for the RNC, and Plaintiffs concede that certain hard money donors currently receive preferential treatment and will continue to do so. Plaintiffs state that the “RNC will not facilitate meetings between officeholders and contributors, encourage officeholders to meet with contributors, or provide any other opportunities for access, *different than or beyond that provided to contributors of federal funds.*” (Pls.’ Br. 23 (emphasis added).) But it defies common sense and the record from *McConnell* to suggest that when the RNC provides big donors special access to officeholders, that the legislators can strike from their consciousness, for example, that a donor has given not only \$30,000 in hard money to the RNC, but another \$100,000 or \$500,000 in soft money. “[D]onors do not really differentiate between hard and soft money; they often contribute to assist or gain favor with an individual politician.” *McConnell*, 251 F. Supp. 2d at 476 (Kollar-Kotelly, J.), 822 (Leon, J.) (quoting Senator Simpson).¹¹

¹¹ Though now restricted in whole or in part to dollar amounts that reduce the danger of corruption, Plaintiffs continue to provide access to contributors of federal funds based on the size of the contribution: At the RNC, for example, donors who give \$15,000 receive “intimate luncheons, dinners, and meetings with key policymakers”; donors who give \$30,400 “enjoy exclusive private functions with elected Republican leaders”; and donors who commit to raising \$60,800 receive “at least one . . . exclusive event during the year,” as well as other “intimate events with key GOP policymakers.” (FEC Fact Resp. ¶ 24 (quoting FEC Exh. 7).) And the RNC sets its highest donation tier to correspond to the legal contribution limit; when the contribution limits rise, the RNC increases the size of the donation required to reach the top tier. (*Id.*) If the RNC were permitted to accept million-dollar donations, it is difficult to believe it would not establish additional “benefits” (i.e., access to candidates and officeholders) beyond the

The examples described above are simply illustrative. Voluminous record evidence in *McConnell* describes donors' use of large soft-money donations to obtain access to federal officeholders and thereby attempt to affect legislative outcomes. That evidence is exhaustively catalogued in Judge Kollar-Kotelly's opinion (*see* 251 F. Supp. 2d at 481-512) and dwarfs the evidence of corruption that the Court in *Buckley* (*see* 424 U.S. at 27 & n.28) and *Shrink Missouri* (*see* 528 U.S. at 393-394) found sufficient in upholding the contribution limits at issue in those cases. In sum, there is every reason to believe that wealthy interests will use any and all available opportunities for buying influence, with or without the active fundraising of officeholders.¹²

C. Overall, FECA Confers Advantages on Political Parties Relative to Other Entities

Plaintiffs argue (Pls.' Br. 29) that in some ways they are worse off than corporations and unions, but they fail to view the big picture. As the Supreme Court has repeatedly held, "differing structures and purposes" of different entities "may require different forms of regulation in order to protect the integrity of the electoral process." *California Med. Ass'n v. FEC*, 453 U.S. 182, 201 (1981); *accord, e.g., Nat'l Right to Work*, 459 U.S. at 210-11. Overall, political parties are subject to fewer restrictions than other entities.

current top level (which would be quite minimal in comparison). In any event, it is beyond dispute after *McConnell* that soft money contributors will secure access to, and influence over, federal officeholders, without regard to whether access is provided by the political parties themselves.

¹² In *McConnell*, the Plaintiffs' own expert, David Primo, testified that, assuming that money does buy access to or influence of federal officeholders, soft money is more likely to buy access or influence "simply by virtue of the numbers." Primo Cross Tr. (Oct. 23, 2002) at 162, *McConnell v. FEC*, Civ. No. 02-582 (D.D.C.), Docket No. 344 (May 16, 2003); *accord* Krasno & Sorauf Expert Rep. at 15 [DEV 1-Tab 2] ("[T]he much greater size of the [soft money] individual donations at issue here pose a proportionately larger risk of influencing their beneficiaries than do contributions of hard money."); Andrews Decl. ¶ 18 [DEV 6-Tab 1]; Wirthlin Cross Tr. (Oct. 21, 2002) at 57, *McConnell*, Docket No. 344 (May 16, 2003).

In *McConnell*, the Court noted that “BCRA actually favors political parties in many ways.” 540 U.S. at 188. Specifically, compared with “nonparty political committees,” political parties can accept much higher contributions from individuals, 2 U.S.C. § 441a(a)(1)(B),(C), and can make contributions that “greatly exceed the contribution limits that apply to other donors” in the form of coordinated expenditures, 2 U.S.C. § 441a(d). *McConnell*, 540 U.S. at 188. In turn, the Court had previously noted that nonparty political committees have “far fewer restrictions” than corporations and unions because the former can make unlimited expenditures on political speech. *California Med.*, 453 U.S. at 200. Putting these two comparisons together, political parties have the most favorable set of restrictions among these entities. And to the extent the parties are regulated differently, the Supreme Court has noted why that difference is appropriate: Other entities “do not select slates of candidates for elections[, or] . . . determine who will serve on legislative committees Political parties have influence and power in the Legislature that vastly exceeds that of any interest group.” *McConnell*, 540 U.S. at 188.

Plaintiffs ignore this bigger picture when they cite (Pls.’ Br. 29) *FEC v. Wisconsin Right to Life*, 127 S. Ct. 2652 (2007) (“*WRTL*”), for the proposition that political parties are disadvantaged relative to corporations and unions. *WRTL* permits corporations and unions to use their general funds only for communications that are not the functional equivalent of express advocacy, *see WRTL*, 127 S. Ct. at 2667, but for all spending on FECA *expenditures*, political parties have a distinct advantage. Corporations and unions must finance their expenditures with hard-money donations raised in increments of \$5,000 or less to their PACs, while national political parties can raise over \$30,000 from each donor. *See* 2 U.S.C. § 441a(a)(1); *see also* FEC Fact Resp. ¶¶ 18 (noting that RNC and DNC are subject to identical contribution limits), 26 (discussing “527” organizations; redacted from public version, filed under seal). And because

Congress and the Supreme Court have presumed that all money spent by political parties is campaign-related, *see infra* p. 33, parties have a distinct fundraising advantage for spending at the core of their mission. Thus, Plaintiffs' argument that *WRTL* renders political parties "disadvantaged" is contrary to the overall statutory scheme, under which national political parties possess significant advantages over all other entities.

V. PLAINTIFFS' APPROACH WOULD CREATE AN UNWORKABLE CONSTITUTIONAL ANALYSIS THAT RELIES ON THEIR UNVERIFIABLE PLEDGES TO AVOID CERTAIN KINDS OF BEHAVIOR

Another fundamental flaw in Plaintiffs' case is its reliance on their vague and unenforceable intention to reduce opportunities for corruption. While acknowledging (Pls.' Br. 21) that *McConnell* upheld Title I in part because of the past fundraising practices of the national parties, Plaintiffs nevertheless attempt (*id.* 21-24) to distance themselves from the corrupting effects of those practices — and *McConnell*'s precedent — by resting their case on the steps they will purportedly take to minimize corruption and its appearance. Thus, even under their own theory, Plaintiffs' case turns on their ability to show, at a minimum, not only that their proposed spending is far removed from influencing federal elections, but also that the behaviors they intend to adopt will eliminate the corruption concerns identified in *McConnell*. For several reasons, this unprecedented attempt to prevail in an as-applied challenge based on ill-defined, inadequate changes in behavior must fail.

First, as discussed above, the record in *McConnell* demonstrates that the changes Plaintiffs intend to make would do little to prevent real or perceived corruption. Large moneyed interests will take advantage of opportunities to buy influence regardless of whether they are formally solicited. Even if officeholders do not themselves solicit soft-money donations, they will be aware of and appreciate such donations to their parties. Donors can feel tremendous

pressure to give even if the solicitations come from party officials rather than officeholders. And when Plaintiffs facilitate special access for donors who give both hard and soft money, the officeholders are unlikely to selectively forget what they know about the donors' soft money generosity.

Second, Plaintiffs have insufficient control over their donors and officeholders to ease the corruption concern. Donors who give large amounts of soft money to the parties will be free to share this information with officeholders — to obtain meetings, to remind officeholders of their generosity at meetings arranged by the party (purportedly because of hard money donations), or to equip their lobbyists when sent out to seek special favors. Likewise, although Plaintiffs assert that they will not facilitate extra access for soft-money donors, they do not purport to represent or control the behavior of the hundreds of federal officeholders and candidates who are members of their party. Given the complete lack of evidence suggesting that Plaintiffs could do anything to prevent a relapse of the *donor* and *officeholder* behaviors demonstrated in *McConnell*, Plaintiffs' intentions to reduce their own role as facilitators of access is of no constitutional significance.

Third, Plaintiffs' suggested constitutional test for exemptions from facially valid contribution limits would introduce an unworkable, vague standard that would defeat the purpose of those limits. In addressing constitutional challenges to other FECA provisions, the Supreme Court has recognized the value of bright-line rules in preventing evasion of the statute's anti-corruption purposes and in furnishing clear guidance to regulated entities. In *Buckley* the Court "assumed" that "most large contributors do *not* seek improper influence over a candidate's position or an officeholder's action." 424 U.S. at 29 (emphasis added). The Court held, however, that the difficulty of isolating suspect contributions and Congress's interest in guarding

against the inherent appearance of abuse justified universal application of the \$1,000 individual contribution limit. *Id.* at 29-30. The Court’s analysis clearly portends the likely failure of as-applied challenges to the contribution limits by well-intentioned contributors who might seek to prove that their own contributions, though in excess of the statutory caps, would be made without any intent to receive special influence in return.¹³ The Court did not invite the lower courts to replace the fixed-dollar contribution limits with new multi-part tests to apply whenever a particular individual seeks to demonstrate that his or her contribution is sufficiently well-intentioned to avoid regulation. *See California Med.*, 453 U.S. at 198-99 (specific contributions to a political committee are subject to general FECA restrictions even if they were purportedly to be used for administrative support, rather than for affecting elections directly); *Goland v. United States*, 903 F.2d 1247, 1258-59 (9th Cir. 1990) (contributions are subject to FECA restrictions even if contributor keeps his identity secret by using straw donors, thereby allegedly precluding opportunity to exert undue influence).

More generally, many prophylactic statutory rules, including the Act’s contribution limits, cannot depend upon an in-depth analysis of the extent to which the interests underlying them are served in each particular situation. In *Hill v. Colorado*, 530 U.S. 703 (2000), for example, the Supreme Court made clear that the rule at issue would simply cease to function if it were made susceptible to as-applied challenges. In that case, a statute banned “unwelcome demonstrators” from coming closer than eight feet to people entering health care facilities. The Court specifically recognized that the statute’s “prophylactic approach . . . will sometimes inhibit a demonstrator whose approach in fact would have proved harmless.” *Id.* at 729. The Court in

¹³ The Court rejected an exception for contributions from “immediate family members,” even though the Court accepted the proposition that the “risk of improper influence is somewhat diminished” in that circumstance. *Buckley*, 424 U.S. at 53 n.59.

Hill nonetheless upheld the statute, explaining that the very exercise of engaging in a case-by-case factual analysis would thwart the rule's effectiveness and limit free expression (*id.*):

But the statute's prophylactic aspect is justified by the great difficulty of protecting, say, a pregnant woman from physical harassment with legal rules that focus exclusively on the individual impact of each instance of behavior, demanding in each case an accurate characterization (as harassing or not harassing) of each individual movement within the 8-foot boundary. Such individual characterization of each individual movement is often difficult to make accurately. A bright-line prophylactic rule may be the best way to provide protection, and, at the same time, by offering clear guidance and avoiding subjectivity, to protect speech itself.

Similarly, in *Florida Bar v. Went For It, Inc.*, 515 U.S. 618 (1995), the Court upheld Florida Bar rules prohibiting lawyers from sending targeted direct mail solicitations to victims and their relatives for 30 days following an accident or disaster. *Id.* at 620. The Court did not question the claims of those challenging the rules that the injuries or grief of some victims are "relatively minor," but stressed instead that making case-specific judgments would entail "drawing difficult lines" as to the severity of different kinds of "grief, anger, or emotion." *Id.* at 633. In such cases, the Court has upheld objective, prophylactic rules that it acknowledged would regulate speech that might not implicate the government interests involved in order to pretermitt the practical difficulty and chilling effect of case-by-case analysis. *See also Heffron v. Int'l Soc'y for Krishna Consciousness, Inc.*, 452 U.S. 640, 654 (1981) (rejecting both as-applied and facial challenges and explaining that "any such exemption [from a rule fixing the physical location of First Amendment activity] cannot be meaningfully limited to [the plaintiff], and as applied to similarly situated groups would prevent the State from furthering its important concern").

Here, Plaintiffs present the same kind of unworkable line-drawing exercise by relying on vague steps they intend to take to reduce the opportunity for corruption. Plaintiffs allege (Pls.'

Br. 23) that the RNC will not “facilitate” meetings between officeholders and contributors; but might they passively participate in the meetings or, conversely, try to prevent them from happening? Plaintiffs allege (*id.*) that they will not “encourage” officeholders to meet with contributors or provide other access in a manner “different than or beyond that provided to contributors of federal funds”; but will they acquiesce in such meetings or, conversely, discourage them? Will the answer differ depending upon how much special access contributors are already getting because of their hard-money contributions? Plaintiffs’ conclusory assertion (*id.*) that an appearance of corruption “is simply not present” here is unsupported by specific evidence about their future practices, silent regarding the relevance and variety of the officeholders’ and donors’ behavior beyond the control of Plaintiffs (*see supra* pp. 26-28), and disconnected from any constitutional yardstick for evaluating these facts. In sum, Plaintiffs’ proposal for as-applied constitutional challenges would enmesh the courts in formless *ad hoc* inquiries into subtle forms of behavior generally occurring behind closed doors.¹⁴

Plaintiffs also provide no suggestion for how their as-applied victory could be enforced or monitored. If an agent of the RNC errs and facilitates a meeting between an officeholder and a soft-money donor, does the RNC have to forfeit the money in its new soft-money accounts? Does it matter how generous the donor has been, how important the meeting was, or whether the

¹⁴ Plaintiffs’ proposed exemption differs not just in degree, but in kind, from the as-applied exemption the Court established in *FEC v. Massachusetts Citizens for Life, Inc.*, 479 U.S. 238, 253-54 (1986) (“*MCFL*”). In *MCFL*, the Court held that the pre-BCRA prohibition on the use of corporate treasury funds for campaign-related expenditures cannot constitutionally be applied to a narrow class of corporations having specified characteristics. *Id.* at 263-64; *see also McConnell*, 540 U.S. at 209-211. The exemption turns on an objective and readily administrable assessment of the organization’s structure and overall activities. Specifically, the inquiry involves several threshold, bright-line inquiries: whether the corporation engages in any business activity, whether anyone has a claim on its assets or earnings, whether the corporation was established by a business corporation or a labor union, and whether it has a policy not to accept any contributions from such entities. *See McConnell*, 540 U.S. at 210-11.

public finds out? How is the Commission to become aware of purposeful or inadvertent failures of Plaintiffs to live up to their promised code of conduct? The Court should be especially wary of blessing an arrangement that creates additional incentives to hide special access for large donors. *Cf. Circuit City Stores, Inc. v. Adams*, 532 U.S. 105, 123 (2001) (rejecting construction of statute that would introduce “complexity and uncertainty” and thereby “undermin[e] . . . the [statute’s] . . . purposes and ‘breed[] litigation from a statute that seeks to avoid it’”).¹⁵

As discussed above, *see supra* pp. 22-23, Plaintiffs already provide their major donors with substantial access to federal candidates and officeholders — access that increases as the size of the donation increases. The RNC has no written policy, and gives no written guidance to its employees, against providing donors with preferential access to federal candidates and officeholders. (FEC Fact Resp. ¶ 24.) To the extent the RNC has an *unwritten* “policy” on this issue, it is the same policy that was in effect prior to BCRA, when the trading of soft money for access ran rampant. (*Id.*) Thus, if the RNC were granted the right to solicit soft money, such solicitations, in combination with the manifestly ineffective anti-access policy, would recreate precisely the situation that existed prior to BCRA’s enactment. It was this situation that the *McConnell* Court held Congress was justified in ending, and so it cannot be Plaintiffs’ constitutional right to bring it back.

¹⁵ Plaintiffs’ position is reminiscent of the argument defendants sometimes make when claiming that a case has become moot: that the voluntary cessation of certain practices has ended any concern about their behavior. *See, e.g., Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC), Inc.*, 528 U.S. 167, 189 (2000). The Supreme Court has explained that the “‘heavy burden of persua[ding]’ the court that the challenged conduct cannot reasonably be expected to start up again lies with the party asserting mootness.” *Id.* (citation omitted). That same burden should apply here concerning Plaintiffs’ alleged changes in fundraising practices and facilitating access to officeholders.

Plaintiffs' proposed constitutional methodology is particularly unworkable because it requires the Court to assess both the relative nexus between their spending and federal elections *and* the sufficiency of their anti-corruption code of conduct as it relates to each type of category of spending Plaintiffs have created. (We explain *infra* pp. 36-44 why Plaintiffs' arguments about the federal impact of their spending are flawed.) Because their challenge marries several categories of spending with several proposed behavioral limits, Plaintiffs' methodology would essentially allow any political party to litigate the validity of a huge number of spending/behavioral permutations — and would require the courts to rule on all of these hypothetical campaign finance regimes that Congress could have, but has not, enacted. Such an approach is almost certain to prove incapable of workable administration, and it would dismantle the careful legislative balancing of interests that culminated in BCRA.

VI. PLAINTIFFS ARE NOT ENTITLED TO A CONSTITUTIONAL EXEMPTION BASED ON THE USES THEY INTEND FOR THEIR FUNDS

A. Plaintiffs' Invented "Unambiguously Campaign Related" Standard Is Inapplicable Here

Throughout their brief, Plaintiffs rely upon their erroneous argument that all campaign finance restrictions are unconstitutional unless they are "unambiguously campaign related." This assertion grossly misinterprets *Buckley* and its progeny. Plaintiffs distort *Buckley* by contending that the decision enshrined the phrase "unambiguously-campaign-related" as a stand-alone constitutional "requirement" (Pls.' Br. 9) that all campaign finance provisions must pass. On the contrary, this phrase was merely part of the Court's explanation that its statutory construction of "expenditure" in one part of the Act's disclosure provisions would resolve "serious problems of vagueness," *Buckley*, 424 U.S. at 76 — a problem that not even Plaintiffs have suggested exists concerning contribution limits.

In particular, Plaintiffs' contention (Pls.' Br. 9-10, 15 n.11) that *Buckley* applied an "unambiguously campaign related" requirement to the definition of "contribution" is flatly contradicted by the plain language of that case and others. Initially, *Buckley* held that the definition of "contribution" raises lesser constitutional concerns than that of "expenditure." While expenditure limits are subject to strict scrutiny because they "place substantial and direct" limits on speech, *Buckley*, 424 U.S. at 58, limits on contributions entail "only a marginal restriction upon the contributor's ability to engage in free communication," *id.* at 20, and will be upheld if they are "closely drawn to match a sufficiently important interest," *McConnell*, 540 U.S. at 136 (citations and quotation marks omitted). Next, *Buckley* found it unnecessary to narrowly construe "contribution" as it did "expenditure," and instead stated that the term includes

not only contributions made directly or indirectly to a candidate, *political party*, or campaign committee, and contributions made to other organizations or individuals but *earmarked for political purposes*, but also all expenditures placed in cooperation with . . . a candidate So defined, "contributions" have a sufficiently close relationship to the goals of the Act, for they are connected with a candidate or his campaign.

424 U.S. at 78 (emphases added); *see also id.* at 24 n.24 ("Funds provided to a candidate or political party or campaign committee either directly or indirectly through an intermediary constitute a contribution.").

Buckley thus concluded that *all* donations received by a candidate or political party have a "sufficiently close relationship" to campaigns to fall legitimately within the scope of the Act, *id.* at 78, and, contrary to Plaintiffs' suggestion, the Court did not employ an "unambiguously campaign related" analysis in reaching this conclusion. Indeed, the only qualifier the Court added was that funds would have to be "earmarked for political purposes" if donated to individuals or organizations *other than* political committees, and even that qualifier is much

broader than Plaintiffs' "unambiguous campaign related" label. Moreover, in *California Medical*, the petitioner argued that contributions to political committees earmarked for administrative support could not be regulated because such contributions lacked potential to corrupt the political process. 453 U.S. at 198 n.19. The Court rejected that argument and explained that donations "earmarked for administrative support" and other non-political purposes can be constitutionally regulated as contributions because exempting such donations "could corrupt the political process in a manner that Congress, through its contribution restrictions, has sought to prohibit." *Id.*

In *McConnell*, the Court reaffirmed its holdings in *Buckley* and *California Medical* and rejected a "crabbed view of corruption." 540 U.S. at 152. In facially upholding the very contribution limits at issue here, the Court specifically rejected the suggestion that limits on contributions can be upheld only if they involve a direct relationship with a candidate.

[W]e upheld [in *Buckley*] FECA's \$25,000 limit on aggregate yearly contributions to candidates, *political committees*, and *party committees* out of recognition that FECA's \$1,000 limit on candidate contributions would be meaningless if individuals could instead make huge contributions to the candidate's political party. Likewise, in *California Medical Assn. v. Federal Election Comm'n*, we upheld FECA's \$5,000 limit on contributions to multicandidate political committees. It is no answer to say that such limits were justified as a means of preventing individuals from using parties and political committees as pass-throughs to circumvent FECA's \$1,000 limit on individual contributions to candidates. Given FECA's definition of "contribution," the \$5,000 and \$25,000 limits restricted not only the source and amount of funds available to parties and political committees to make candidate contributions, but also the source and amount of funds available to engage in express advocacy and *numerous other noncoordinated expenditures*.

McConnell, 540 U.S. at 152 n.48 (last emphasis added) (quotation marks and internal citations omitted). Thus, the Court again held that limits on contributions to political parties (and other

political committees) are constitutional even if the funds received are eventually used for a variety of “noncoordinated expenditures” that do not include express advocacy.¹⁶

Plaintiffs also rely heavily on *MCFL* and *WRTL* in their “unambiguously campaign related” argument, but those cases involved 2 U.S.C. § 441b’s direct limits on corporate independent expenditures and electioneering communications, not contributions. Moreover, while those cases limited the scope of section 441b, nothing in them undermines *McConnell*’s holding that *Buckley*’s “express advocacy limitation, in both the expenditure and the disclosure contexts, was the product of statutory interpretation rather than a constitutional command.” *McConnell*, 540 U.S. at 191-92. Thus, *Buckley*’s interpretation of the term independent “expenditure” (when made by individuals or groups other than political committees) to mean spending that is “unambiguously related” to the campaign of a candidate, 424 U.S. at 79-80, has no bearing on the Act’s *contribution* limits, which, as discussed *supra* p. 33, requires no narrowing construction to avoid vagueness.¹⁷

¹⁶ Cf. *FEC v. Malenick*, Civ. No. 02-1237, 2005 WL 588222 (D.D.C. Mar. 7, 2005) (*California Medical* stands for proposition that classifying funds as “contributions” under Act is not function of subjective intent of contributor as to how money will be spent).

¹⁷ Plaintiffs also rely (Pls.’ Br. 11 n.7) on *Bellotti* and *Citizens Against Rent Control* for their “unambiguously campaign related” theory, but those cases neither used that phrase nor had anything to do with any *candidate* campaigns; they concerned pure issue speech regarding citizen initiatives and referenda. See *Bellotti*, 435 U.S. at 790 (distinguishing referendum from candidate campaign); *Citizens Against Rent Control*, 454 U.S. at 297 (same). Neither *Citizens Against Rent Control* nor *Bellotti* even mentioned *Buckley*’s “expenditure” construction, much less applied it to ballot initiative funding issues.

Likewise, Plaintiffs’ reliance (Pls.’ Br. 16 n.13) on FEC Advisory Opinion 2005-10 is mistaken. In that opinion, the Commission permitted two members of Congress to raise nonfederal funds for a state committee formed to support or oppose state ballot initiatives in a special election in which no candidates — state or federal — were on the ballot. See FEC Advisory Op. 2005-10 (“AO 2005-10”), <http://saos.nictusa.com/aodocs/2005-10.pdf> (Aug. 22, 2005); Cal. Sec’y of State, *Statewide Special Election Nov. 8, 2005*, <http://vote2005.sos.ca.gov/> (last visited March 5, 2009). The Commission found that the specific language of 2 U.S.C. § 441i(e)(1) did not encompass elections where there were *no* candidates of any kind on the ballot. See AO 2005-10 at 2-3; *Concurring Statement of Comm’rs Weintraub & McDonald*, AO

Finally, Plaintiffs cite *North Carolina Right to Life, Inc. v. Leake*, in which the court invalidated state statutes that defined when an organization would be considered a political committee and that restricted communications made by entities other than political committees. *See* 525 F.3d 274, 281, 288 (4th Cir. 2008). The Fourth Circuit, however, specifically noted that these holdings were inapplicable to organizations that “have the support or opposition of candidates as their primary purpose.” *See id.* at 289 (citing *Buckley*). Political parties are the paradigmatic example of such organizations, because

[w]hile contributions made to political parties may not be passed through directly to candidates, the “special relationship and unity of interest” between political parties and candidates makes parties logical “agents for spending on behalf of those who seek to produce obligated officeholders.”

Id. at 292 (quoting *McConnell*, 540 U.S. at 145-47; internal citations omitted).¹⁸ Thus, *Leake* does not support Plaintiffs’ attempt to apply their invented doctrine to political parties.

B. Much of Plaintiffs’ Proposed Activity Will Affect Federal Elections

As explained *supra* pp. 10-12, in *McConnell* the Court rejected the argument that Title I is “impermissibly overbroad because it subjects *all* funds raised and spent by national parties to FECA’s hard-money source and amount limits, including, for example, *funds spent on purely*

2005-10, at 4, <http://saos.nictusa.com/aodocs/413243.pdf>; *Concurring Opinion of Vice-Chairman Toner & Comm’r Mason*, AO 2005-10, at 1, <http://saos.nictusa.com/aodocs/413244.pdf>. That purely statutory interpretation is irrelevant to this case and does not embrace or support Plaintiffs’ unambiguously-campaign-related theory.

¹⁸ One of the statements of FEC Commissioners to which Plaintiffs cite (Pls.’ Br. at 16 n.13) similarly related to a determination regarding political committee status — a determination that is irrelevant in the context of political parties. *See* Statement of Reasons of Vice Chairman Petersen, *et. al*, *In re November Fund*, MUR 5541, at 5 n.21, <http://eqs.nictusa.com/eqsdocs/29044223819.pdf> (Jan. 22, 2009) (distinguishing political parties and citing *McConnell*). The other Commissioner statement on which Plaintiffs rely cites the *Buckley* language only in construing the statutory definition of “expenditure,” just as *Buckley* itself did. *See* Statement of Reasons of Chair Weintraub, *et al.*, *In re Council for Responsible Gov’t, Inc.*, MURs 5024, 5146, 5154, at 2, <http://eqs.nictusa.com/eqsdocs/000006C6.pdf> (Dec. 16, 2003).

state and local elections in which no federal office is at stake.” 540 U.S. at 154 (second emphasis added). Again, the Court was fully aware that 30% of the nonfederal funds the RNC had raised in 2001 was spent on “purely state and local election activity.” *Id.* at 154 n.50. Thus, although Plaintiffs are correct when they note (Pls.’ Br. 24) that the Court explained that much of the activity at issue under Title I in fact “benefits federal candidates,” 540 U.S. at 167, Plaintiffs are wrong when they suggest that this factual finding was meant in any way to provide a litmus test for future as-applied challenges.

In any event, the Court has a much broader view than Plaintiffs of what benefits federal candidates:

Common sense dictates, and it was “undisputed” below, that a party’s efforts to register voters sympathetic to that party directly assist the party’s candidates for federal office. 251 F. Supp. 2d, at 460 (Kollar-Kotelly, J.). It is equally clear that federal candidates reap substantial rewards from any efforts that increase the number of like-minded registered voters who actually go to the polls. See, e.g., *id.*, at 459 (“[The evidence] shows quite clearly that a campaign that mobilizes residents of a highly Republican precinct will produce a harvest of votes for Republican candidates for both state and federal offices. A campaign need not mention federal candidates to have a direct effect on voting for such a candidate. . . . [G]eneric campaign activity has a direct effect on federal elections” (quoting Green Expert Report 14)).

540 U.S. at 167-68.¹⁹ Thus, Congress concluded that capping soft money donations rather than eliminating them would represent legislative approval of direct donations by corporations and unions to national political parties that would “send[] the campaign finance laws back in time to the very beginning of the 20th century before the Tillman Act banned direct corporate donations

¹⁹ When the Court discussed the exploding use of soft money just before the enactment of BCRA, the Court explained that, “concerning the treatment of contributions intended [to be spent on activities] to influence both federal and state elections,” a “literal reading of FECA’s definition of ‘contribution’ would have *required such activities to be funded with hard money.*” *McConnell*, 540 U.S. at 123 (emphasis added). An expenditure that influences federal elections does not lose that effect even if it also influences state elections. *See id.* at 166.

to the parties and before Taft-Hartley banned direct labor contributions to the parties.” 147
 Cong. Rec. S2887-88 (Mar. 26, 2001) (Sen. Feingold).

Much of the activity that Plaintiffs intend to pursue affects both federal and nonfederal elections. On the other hand, some activity by state and local parties may be financed entirely with *nonfederal* funds, in which case Title I imposes no restrictions. All of these kinds of activities were before the Court in *McConnell*. Specifically:

1. The RNC wants (Pls.’ Br. 3-5) to create “state accounts” to finance, *inter alia*, “GOTV mail, voter registration drives,” and other activities to support the election of state candidates, and to set up separate accounts for New Jersey and Virginia state elections in 2009. The CRP and RPSD wish to engage in similar activities in California and San Diego Country.²⁰ Plaintiffs concede (*id.* 38) that some of these state accounts and resulting activities will be conducted “in elections where federal candidates are on the ballot.” Although they assert that these activities will not “target” federal candidates, they also concede (*id.*) that these activities “might have the collateral [e]ffect of benefitting federal Republican candidates on the ballot with state candidates.” Specifically, all three organizational Plaintiffs have conceded that their voter registration activities are designed to maximize the number Republicans registered to vote, and that these activities are intended to influence, and do influence, *all* partisan elections, both state and federal. (FEC’s Fact Resp. ¶¶ 42, 45, 62.) All three party Plaintiffs have also conceded that GOTV efforts in mixed elections inherently influence all elections that are on the ballot, as it is impossible to increase the number of Republican and Republican-leaning voters in state races without also increasing the number of those voters in the federal races on the same ballot. (*Id.* ¶¶

²⁰ Plaintiff Duncan’s claim regarding a desire to solicit soft money for each of the parties’ activities is entirely derivative — i.e., Duncan’s claim fails because none of the underlying

43, 45, 62; *see also* Pls.’ Br. 45.)²¹ As discussed above, *McConnell* has already held that such mixed purpose activity affects federal elections and that what Plaintiffs call a “collateral” effect is quite sufficient to justify Title I’s contribution limits: “It is . . . clear that federal candidates reap substantial rewards from *any efforts* that increase the number of like-minded registered voters who actually go to the polls A campaign need not mention federal candidates to have a direct effect on voting for such a candidate.”²² 540 U.S. at 167-68 (emphasis added; internal quotation marks and citations omitted).²³ Plaintiffs appear to rest this portion of their attempt (Pls.’ Br. 38, 45) to undermine *McConnell* — including their New Jersey and Virginia activities — on their “unambiguous campaign related” theory; however, as explained *supra* pp. 32-36, that theory lacks merit.

activities is permissible — and so the Commission does not separately address Duncan herein. (*See also* FEC Fact Resp. ¶ 4 (noting that Duncan no longer holds leadership position at RNC).)

²¹ As the Supreme Court noted in *McConnell*, the Commission has interpreted 2 U.S.C. § 431(20)(A)(ii) to allow state and local parties to use nonfederal dollars to engage in voter registration and GOTV “during the runup to elections when no federal office is at stake.” *McConnell*, 540 U.S. at 169 & n.63 (citing 11 C.F.R. § 100.24(a)(1)). Thus, Title I would not place any limits on state and local parties in Virginia and New Jersey if they intend to engage in such activity leading up the gubernatorial races in 2009.

²² As discussed *infra* pp. 42-44, state and local parties can finance certain kinds of mixed federal/nonfederal election activity with a mixture of hard money and “Levin funds,” so CRP need not use entirely federal dollars for some of this activity.

²³ The Supreme Court concluded that BCRA’s state money provisions were justified in part by a danger that the national parties would use the state parties to circumvent the new limits on contributions to the national parties. *McConnell*, 540 U.S. at 165-66. Plaintiffs suggest (Pls.’ Br. 25) that that portion of *McConnell* is at odds with a statement in *WRTL* about the limits of potential circumvention as a government justification in the context of strict scrutiny, but only the Supreme Court may overrule one of its precedents. *See supra* n.4. Moreover, Plaintiffs’ suggested overruling ignores not only that *WRTL* was in the different context of strict scrutiny, but also that the holding in *McConnell* regarding state parties rested on both Congress’s prediction of circumvention and its conclusion, “based on the evidence before it,” that “state committees function as an alternative avenue for precisely the same corrupting forces” related to soft money as the national party committees. 540 U.S. at 164.

2. Plaintiffs claim (Pls.' Br. 33) that money spent on redistricting is too attenuated to be "unambiguously campaign related." Again, that phrase is not the applicable standard. In any event, the record from *McConnell* demonstrates that "[r]edistricting efforts affect federal elections no matter when they are held." 251 F. Supp. 2d at 468 (Kollar-Kotelly, J.).

The most important legislative activity in the electoral lives of U.S. House members takes place during redistricting, a process that is placed in the hands of state legislatures. The chances that a House incumbent will be ousted by unfavorable district boundaries are often greater than the chances of defeat at the hands of the typical challenger. Thus, federal legislators who belong to the state majority party have a tremendous incentive to be attuned to the state legislature and the state party leadership.

Id. at 462 (quoting Green Expert Report at 11-12 [DEV 1-Tab 3]). The importance of redistricting to federal officeholders has not been lost on large soft money donors. As one memorandum to a high-level Fortune 100 company executive from the company's own governmental affairs staff explained,

because both parties will be working to influence redistricting efforts during the next two years, we anticipate that we will be asked to make soft money contributions to these efforts. Redistricting is a key once-a-decade effort that both parties have very high on their priority list. Given the priority of the redistricting efforts, relatively small soft money contributions in this area could result in disproportionate benefit.

Id. at 508 (quoting memorandum).

Consistent with the *McConnell* record, Plaintiffs admit that redistricting "involves congressional districts," and the RNC has conceded that the purpose of its redistricting activities is to divide *federal* and state legislative districts "into a proper format that hopefully would be . . . more of a benefit to [the RNC] than the opposition party." (FEC Fact Resp. ¶ 13 (quoting Josefiak Dep. 155:18-21 (FEC Exh. 1)); *see also id.* (noting CRP and RPSD's admissions regarding federal effect of redistricting activities).)

3. The CRP alleges that it intends to spend funds supporting or opposing ballot initiatives. Although Plaintiffs acknowledge (Pls.' Br. 40) that BCRA's soft money rules for state and local parties only apply to "federal election activity," Plaintiffs ignore the rules' details. 2 U.S.C. § 441i(b). Title I does not prevent CRP from using nonfederal funds to support or oppose ballot initiatives.

As the Court in *McConnell* summarized, 540 U.S. at 161-63, state and local parties can pay for certain kinds of federal election activity (such as voter registration activity and GOTV) with a mix of hard money and a special kind of soft money known as "Levin funds"; public communications that promote, attack, support or oppose ("PASO") a clearly identified federal candidate must be paid for entirely with federal dollars; and public communications that refer solely to nonfederal candidates and do not otherwise constitute federal election activity can be paid for entirely with nonfederal funds. Communications that address only state ballot initiatives would not constitute federal election activity, and state and local parties can finance them with nonfederal dollars. Thus, if CRP wishes to finance public communications that advocate for or against ballot initiatives, it can use nonfederal dollars to do so, as long as those communications do not include other messages that constitute federal election activity. Indeed, the CRP distributes communications that endorse or oppose state ballot initiatives and identify federal candidates, without PASOing those candidates. (FEC Fact Resp. ¶ 63.) If, however, CRP combines otherwise unregulated communications with additional content that constitutes federal election activity, the unregulated portion cannot immunize the federal election activity from regulation.

The Court in *McConnell* upheld these provisions on their face, finding them closely drawn to an anticorruption interest, justified despite whatever associational burden they may

impose, and not so severe as to prevent the parties from engaging in effective advocacy. 540 U.S. at 166-74. In particular, the Court upheld the provision that requires communications that PASO federal candidates to be financed entirely with federal dollars and rejected the argument that the PASO standard is unconstitutionally vague. *Id.* at 170 & n.64.

Plaintiffs suggest (Pls.' Br. 42-44) that the Supreme Court's analysis in *WRTL* should be applied to the PASO standard, but that case is inapplicable here. *WRTL* addressed an expenditure limit for corporations and unions subject to strict scrutiny, while this case involves a contribution limit subject to intermediate scrutiny; *WRTL* dealt with a bright-line definition of "electioneering communication" that the Court narrowed to be sure it did not go beyond the functional equivalent of express advocacy, while this case deals with the PASO standard, which the Court has already determined is not unconstitutionally vague; and *WRTL* concerned regulation of corporate speech, while this case concerns regulation of political parties. The Court in *McConnell* reaffirmed its holding in *Buckley* that "actions taken by political parties are presumed to be in connection with election campaigns." 540 U.S. at 170 n.64 (citing *Buckley*, 424 U.S. at 79). No such presumption existed regarding the corporate plaintiff in *WRTL*.

In sum, CRP can finance public communications taking positions on ballot initiatives with nonfederal dollars, but if it includes in those communications messages that PASO federal candidates, Congress may lawfully require it to finance those communications with money raised within the federal contribution limits.

4. The RNC alleges that it intends to engage in additional activities that it contends are not "unambiguously" related to a federal campaign and thus not constitutionally subject to BCRA's soft money provisions. As explained *supra* pp. 32-36, that "test" has not been endorsed

by the Supreme Court, and the lack of any such “unambiguous” nexus to a particular federal campaign does not entitle the RNC to any constitutional exemption.

In particular, the RNC intends (Pls.’ Br. 3-5) to pay for “grassroots lobbying” in connection with federal legislation, to finance litigation such as this case (*see* FEC Fact Resp. ¶ 20), and to maintain its building headquarters (*see id.* ¶ 21). While the precise contours of what the RNC considers to be “grassroots lobbying” are unclear, the record demonstrates that the RNC’s request to fund these communications with soft money would open the door to precisely the same kind of “issue advertising designed to influence federal elections” about which Congress and the Supreme Court were concerned. *McConnell*, 540 U.S. at 131.²⁴ Indeed, the RNC has testified that several of the specific communications that this Court found in *McConnell* to be sham issue ads — i.e., “so-called ‘issue ads’” that “were actually electioneering advertisements,” *McConnell*, 251 F. Supp. 2d at 826 (Leon, J.) — would constitute “grassroots lobbying” under the RNC’s definition of that term. (FEC Fact Resp. ¶ 16.) Permitting these ads to once again be financed with unlimited, corporate contributions would undo the very heart of what BCRA was intended to stop and the Supreme Court upheld.

As to the miscellaneous other activities, Plaintiffs concede (Pls.’ Br. 40) that the RNC’s own party solicitor will be grateful to contributors for such soft money donations and provide no reason to conclude that their own officeholders would not share that gratitude. As explained *supra* pp. 16-24, the record in *McConnell* amply demonstrates that officeholders are generally grateful to donors who have given large soft money contributions to their party, and the Supreme

²⁴ In listing the disbursements it has made to “support” candidates, the CRP includes “non-advocacy issue-oriented mailings.” (*See* Pls.’ Statement of Undisputed Material Facts ¶ 39.) By acknowledging that “issue-oriented” communications are made to “support” candidates, the CRP negates the RNC’s putative rationale for permitting such communications to be financed with soft money.

Court relied upon this and other aspects of the soft money system when it upheld BCRA and concluded that its provisions were constitutional to prevent both corruption and the appearance of corruption. Also as explained *supra* pp. 33-35, the Court had previously held in *California Medical* that donations to political committees for ostensibly non-electoral purposes can still be counted as statutory contributions and subjected to limits, both because of the fungibility of money and because of the undue influence that large donors can acquire, even by giving funds that are not earmarked directly for political purposes. Plaintiffs have offered no reason to reach a different result here.

CONCLUSION

For the foregoing reasons, Plaintiffs' motion for summary judgment should be denied.

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Dated: March 9, 2009

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<hr/>)	
REPUBLICAN NATIONAL COMMITTEE,)	
<i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Civ. No. 08-1953 (BMK, RJL, RMC)
)	
FEDERAL ELECTION COMMISSION,)	
<i>et al.</i> ,)	STATEMENT OF GENUINE ISSUES
)	
Defendants.)	
<hr/>)	

**DEFENDANT FEDERAL ELECTION COMMISSION’S
STATEMENT OF GENUINE ISSUES**

Pursuant to LCvR 7(h) and 56.1, Defendant Federal Election Commission (“Commission”) submits the following statement of genuine issues in opposition to Plaintiffs’ Statement of Undisputed Material Facts (“Pls.’ Stmnt.”). The Commission reproduces below the enumerated paragraphs of Plaintiffs’ Statement, each followed by the Commission’s response.

Many of Plaintiffs’ proposed facts directly or indirectly attempt to call into question findings of legislative fact made by the Supreme Court in *McConnell v. FEC*, 540 U.S. 93 (2003). Once resolved by an appellate court, however, issues of legislative fact need not be relitigated in lower courts each time they arise. *See Carhart v. Gonzales*, 413 F.3d 791, 800-01 (8th Cir. 2005) (legislative fact addressed by the Supreme Court need not be relitigated); *A Woman’s Choice v. Newman*, 305 F.3d 684, 689 (7th Cir. 2002) (same). For each of the following facts in which the Supreme Court has resolved the challenged fact, this Court does not need to revisit the issue and may simply adopt the finding already made.

1. Plaintiff Republican National Committee (“RNC”) “ha[s] the general management of the Republican Party, subject to direction from the national convention.” Rule 1, *Rules of the Republican Party* (2004). It is “[a] national committee of a political party” under 2 U.S.C. § 441i(a). Complaint ¶ 11.

FEC RESPONSE 1: The record in *McConnell* established that the national parties are “inextricably intertwined with federal officeholders and candidates,” *McConnell*, 540 U.S. at 155 (quoting Congressman Shays), and that “[t]here is no meaningful separation between the national party committees and the public officials who control them,” *id.* (quoting *McConnell v. FEC*, 251 F. Supp. 2d 176, 468-69 (D.D.C. 2003) (Kollar-Kotelly, J.) (internal quotation omitted)). “The President typically controls his party’s national committee, and once a favorite has emerged for the presidential nomination of the other party, that candidate and his party’s national committee typically work closely together.” *McConnell*, 251 F. Supp. 2d at 697 (Kollar-Kotelly, J.).

The record in this case is not to the contrary. “[T]he role of the RNC is to be a political arm of Republicans either seeking office or in office” (Josefiak Dep. 197:1-18 (FEC Exh. 1)), and so the RNC’s activities are inherently geared towards the interests of Republican officeholders and candidates. For example, when the President of the United States is a Republican, the President nominates the chairperson of the RNC, and there is regular strategic coordination between the party and the White House. (*See id.* 193:2-194:20.) The RNC also works with candidates each election cycle to develop “victory plans,” which are joint, comprehensive, election-specific strategies (*see id.* 198:13-199:8), and by selling voter preference data to campaigns (*see id.* 200:10-12) or, on occasion, exchanging donor lists with them (*see id.* 98:8-14).

In addition to being an “arm” of Republican candidates and officeholders, the RNC is tightly connected to state Republican parties. The chairperson of each state Republican party sits

on the RNC (*id.* 14:18-15:13) — an arrangement that facilitates near-constant strategic communication between the RNC and the states (*see id.* 200:13-201:1). Thus, the RNC is not merely a standalone “national committee.”

2. Plaintiff California Republican Party is the state Republican Party of California. It is “a State . . . committee of a political party” under 2 U.S.C. § 441i(b)(1). Complaint ¶ 12.

FEC RESPONSE 2: According to the Court in *McConnell*, “Congress recognized that” there were “close ties between federal candidates and state party committees,” 540 U.S. at 161, and concluded — “based on the evidence before it” — that “state committees function as an alternative avenue for precisely the same corrupting forces” of soft money as the national party committees, *id.* at 164.

The CRP’s chairperson serves on the RNC, and all three of the CRP’s RNC members regularly convey strategic information among and between the CRP and the RNC. (*See* Christiansen Dep. 14:16-18, 15:2-5, 17:14-18 (FEC Exh. 2); *see also supra* FEC Response ¶ 1.) Communication between the RNC and CRP is particularly frequent during election years, when the parties discuss strategic topics such as voter registration and voter contact goals. (*See* Christiansen Dep. 173:19-174:15 (FEC Exh. 2).) In addition, the CRP’s Board of Directors always includes a United States Representative, who serves on behalf of the entire California Republican congressional delegation. (*Id.* 170:6-11.) The CRP, therefore, is inextricably intertwined with both the RNC and California’s federal officeholders and candidates.

3. Plaintiff Republican Party of San Diego is a “local committee of a political party” under 2 U.S.C. § 441i(b)(1). Complaint ¶ 13.

FEC RESPONSE 3: Congress through BCRA and the Court in *McConnell* recognized that there were “close ties” between federal candidates and “local committees.” 540 U.S. at 161. Each Republican United States Representative from San Diego County is an officer of the RPSD

(Buettner Dep. 11:14-23, 99:14-24 (FEC Exh. 3)), and so the leadership of the RPSD is inextricably intertwined with that area's federal officeholders and candidates. In addition, the CRP engages in strategic coordination with local Republican committees, including the RPSD, as to key party activities, such as voter registration and voter contact. (See Christiansen Dep. 175:8-176:4 (FEC Exh. 2).)

4. Plaintiff Robert M. (Mike) Duncan is the National Committeeman of the Kentucky Republican Party and the RNC Chairman, in which capacity he is RNC's chief executive officer. Complaint ¶ 14.

FEC RESPONSE 4: Duncan's term as RNC Chairman ended on January 30, 2009. (Josefiak Dep. 29:4-20 (FEC Exh. 1).) Duncan remains a member of the RNC, but he has no official leadership role within that organization. (*Id.* 29:21-30:13.) He has no authority, beyond that of any other RNC member, over the actions or decisions of the current RNC Chairman. (*See id.*)

5. Defendant Federal Election Commission ("FEC") is the government agency with enforcement authority over FECA. Complaint ¶ 15.

FEC RESPONSE 5: The FEC is the government agency with authority over the administration, interpretation, and civil enforcement of the Federal Election Campaign Act of 1971, 2 U.S.C. §§ 431-55 ("FECA"), and other federal campaign-finance statutes. The Commission is empowered to "formulate policy" with respect to FECA, 2 U.S.C. § 437c(b)(1); "to make, amend, and repeal such rules . . . as are necessary to carry out the provisions of [FECA]," 2 U.S.C. §§ 437d(a)(8), 438(a)(8); *see* 2 U.S.C. § 438(d); and to issue written advisory opinions concerning the application of FECA and Commission regulations to any specific proposed transaction or activity, 2 U.S.C. §§ 437d(a)(7), 437f.

6. As a national political party committee, the RNC has historically participated and participates today in electoral and political activities at the federal, state and local levels. The RNC seeks to advance its core principles by advocating Republican positions, electing

Republican candidates and encouraging governance in accord with Republican views at the federal, state and local levels. *McConnell*, 251 F. Supp.2d at 335 (citations omitted) (Judge Henderson’s findings). The RNC “has historically participated and participates today in electoral and political activities at the federal, state and local levels.” *Id.* These activities in state and local elections “are substantial both in their importance to the RNC’s mission and in their resource commitment.” *Id.* “Even for elections in which there is no federal candidate on the ballot, the RNC trains state and local candidates, donates to state and local candidate campaign committees, funds communications calling for the election or defeat of state and local candidates and engages in get-out-the-vote activities.” *Id.* at 336.

FEC RESPONSE 6: The fact that the RNC spends a small portion of its funds on state and local elections is not relevant. As the Supreme Court explained in *McConnell*, it “is beside the point” for purposes of evaluating the soft money restrictions in BCRA. 540 U.S. at 154. For example, the Court noted the political parties’ claim that the RNC had spent 30% of the nonfederal funds it raised in 2001 on “purely state and local election activity,” *id.* at 154 n.50, and then explained that the record demonstrated that “the close relationship between federal officeholders and the national parties, as well as the means by which parties have traded on that relationship, . . . have made *all large soft-money contributions* to national parties suspect.” *McConnell*, 540 U.S. at 154-55 (emphasis added).

Even if the proposed spending were relevant, the record in *McConnell* demonstrated that prior to BCRA — when the RNC was permitted to receive nonfederal funds ostensibly for the same type of activities at issue in this case — the RNC donated only a “small fraction” of its federal funds to state and local candidates. 251 F. Supp. 2d at 464 (Kollar-Kotelly, J.). Combined, the two national parties donated “less than 4% of their soft money spending and 1.6% of their total financial activity in 2000” to state candidates. *Id.* (internal quotation marks omitted). Activities such as training of state and local candidates or direct donations to them “constituted a very small portion of the political parties’ nonfederal expenditures during the 2000 election cycle.” *Id.*

Moreover, nothing prevents the RNC from spending as much of its money on state and local activities as it prefers. The RNC contributed approximately \$900,000 to a candidate for governor of Virginia in 2005, \$300,000 to New Jersey county parties that year, \$540,000 to the Louisiana Republican Party in 2007, and \$450,000 to the Kentucky Republican Party in 2007. (See Pl. RNC's Discovery Resps. at 4-5 (FEC Exh. 4).) Thus, as to elections "in which there is no federal candidate on the ballot," the RNC has spent a total of approximately \$2.2 million on such elections since 2003, although that only constitutes approximately 0.2% of the RNC's disbursements during this period. (See *id.*; contributions and disbursements per election cycle available at <http://www.fec.gov/finance/disclosure/srssea.shtml>.) If the RNC were interested in committing more of its resources to state and local activity, it was free to spend more of the nearly \$1.1 billion it raised in that time period on such activity.

7. "The RNC seeks to advance its core principles by advocating Republican positions, electing Republican candidates and encouraging governance in accord with Republican views at the federal, state and local levels." 251 F. Supp. 2d at 335 (Judge Henderson's findings).

FEC RESPONSE 7: The fact that the RNC claims to spend money on activities other than electing federal candidates is "beside the point," i.e., not relevant. See *supra* FEC Response ¶ 6 (quoting *McConnell*). Even if its proposed spending were relevant, the record in *McConnell* demonstrated that prior to BCRA — when the RNC was permitted to receive nonfederal funds ostensibly to, *inter alia*, advance Republican policy positions — "genuine issue advocacy on the part of political parties [was] a rare occurrence." 251 F. Supp. 2d at 451 (Kollar-Kotelly, J.). Similarly, the RNC spent only "a minuscule percentage" of its nonfederal budget on state and local governmental affairs. *Id.* at 463. "What is clear from the evidence [in *McConnell*], however, is that regardless of whether or not it is done to advocate the party's principles, the Republican Party's primary goal is the election of its candidates who will be advocates for their

core principles.” *Id.* at 470. The RNC was unable in this case to substantiate that it had spent any money on advertisements that it considers “grassroots lobbying” during the last three election cycles. (Pl. RNC’s Discovery Responses at 6 (FEC Exh. 4).)

8. The RNC intends to (a) create a New Jersey Account for state funds (non-federal funds subject to state regulation) subject to New Jersey state law, (b) solicit state funds into the account under New Jersey state law, and (c) use those funds to support state Republican candidates in the November 2009 election. Because New Jersey holds its state elections in odd numbered years, there will be no federal candidates on the 2009 ballot. Beeson Aff. ¶ 3.

FEC RESPONSE 8: The fact that the RNC hopes to spend some of its money on New Jersey state candidates this year is “beside the point,” i.e., not relevant. *See supra* FEC Response ¶ 6 (quoting *McConnell*). Moreover, the RNC may spend as much of its money on those campaigns as it prefers. Indeed, the RNC contributed nearly \$900,000 to a candidate for governor of New Jersey in 2005 and nearly \$300,000 to New Jersey county parties that year. *Id.*

9. The RNC plans to use funds from the New Jersey Account to make direct contributions to New Jersey state and local candidates according to state law limits. At this time, the RNC does not know the specific candidates that it will support, as the party rules preclude it from supporting pre-primary candidates unless (1) the candidate is unopposed or (2) it receives prior written and filed approval of all RNC members from the state in question. The RNC plans to use these funds to make independent expenditures advocating the election of the New Jersey Republican gubernatorial nominee, specific advertising and direct mail for the entire Republican ballot in New Jersey, and for get-out-the-vote (“GOTV”) calls. None of these activities would clearly identify any federal candidate. Beeson Aff. ¶ 4.

FEC RESPONSE 9: *See supra* FEC Response ¶ 8.

10. The RNC intends to (a) create a Virginia Account for state funds subject to Virginia state law, (b) solicit state funds into the account under Virginia state law, and (c) use those funds to support Republican candidates for the November 2009 election. Like New Jersey, Virginia also holds its elections for state office in odd numbered years. Therefore, there are no federal candidates on the 2009 Virginia ballot. Beeson Aff. ¶ 5.

FEC RESPONSE 10: The fact that the RNC hopes to spend some of its money on Virginia state races is “beside the point,” i.e., not relevant, and the RNC is permitted to spend as

much of its money on Virginia state candidates this year as it prefers. *See supra* FEC Response ¶ 6 (quoting *McConnell*).

11. The RNC plans to use funds from the Virginia Account to make direct contributions to legislative races. Such contributions are especially important to maintain the Republican majority in the state assembly before redistricting. The RNC plans to directly coordinate campaign activities with the Republican gubernatorial nominee and place GOTV calls. None of these activities would clearly identify any federal candidate. Beeson Aff. ¶ 6.

FEC RESPONSE 11: *See supra* FEC Response ¶ 10; *infra* FEC Response 13 (discussing redistricting).

12. Virginia is especially important to the RNC's political strategy for several reasons: (1) Virginia has traditionally been a stronghold for Republicans, and the RNC is looking forward to recapturing this "red state"; (2) maintaining a Republican majority in the state assembly is crucial to influencing the state's redistricting; (3) the current Democrat frontrunner for governor, Terry McAuliffe, a former Democratic National Committee ("DNC") chairman, has extremely high name recognition; (4) the appointment of Governor Tim Kaine as DNC chairman puts a national focus on the Virginia gubernatorial race. Beeson Aff. ¶ 7.

FEC RESPONSE 12: *See supra* FEC Response ¶ 10; *infra* FEC Response 13 (discussing redistricting).

13. The RNC intends to (a) create a Redistricting Account, for non-federal funds and state funds subject to state law, (b) solicit funds into the account under applicable state laws, and (c) use those state funds to support the redistricting efforts of various states' Republican parties after the 2010 census. Beeson Aff. ¶ 8.

FEC RESPONSE 13: The fact that the RNC hopes to spend some of its money on redistricting is "beside the point," i.e., not relevant. *See supra* FEC Response ¶ 6 (quoting *McConnell*). If the manner of spending were relevant, the *McConnell* record demonstrated that "[r]edistricting efforts affect federal elections no matter when they are held," and that national party redistricting efforts "are of value to Members of Congress because the changes in the composition of a Member's district can mean the difference between reelection and defeat." 251 F. Supp. 2d at 462, 468 (Kollar-Kotelly, J.).

The most important legislative activity in the electoral lives of U.S. House members takes place during redistricting, a process that is placed in the hands of state legislatures. The chances that a House incumbent will be ousted by unfavorable district boundaries are often greater than the chances of defeat at the hands of the typical challenger. Thus, federal legislators who belong to the state majority party have a tremendous incentive to be attuned to the state legislature and the state party leadership.

Id. at 462 (quoting Defendants' expert Donald Green). The importance of redistricting to federal officeholders was not lost on large soft money donors. As one memorandum to a high-level Fortune 100 company executive from the company's own governmental affairs staff explained,

because both [national] parties will be working to influence redistricting efforts during the next two years, we anticipate that we will be asked to make soft money contributions to these efforts. Redistricting is a key once-a-decade effort that both parties have very high on their priority list. Given the priority of the redistricting efforts, relatively small soft money contributions in this area could result in disproportionate benefit.

Id.

The record in this case is consistent with *McConnell*. The RNC has conceded that the purpose of its redistricting activities is to divide *federal* and state legislative districts "into a proper format that hopefully would be . . . more of a benefit to [the RNC] than the opposition party." (Josefiak Dep. 155:18-21 (FEC Exh. 1).) Indeed, the CRP has repeatedly noted in this case the effect that redistricting can have on campaigns for the United States House of Representatives. (*See* Pls.' Stmt. ¶¶ 36, 38 ("California's Congressional seats were redistricted in 2001 to virtually eliminate partisan competition at general elections . . .").) The RPSD has noted the same effect. (*Id.* ¶ 55.)

14. The Redistricting Account would provide resources for political activity related to winning state legislative races; technology and staffing to support the data compilation, analysis, and map drawing related to redistricting; and litigation efforts and other legal fees related to redistricting. The political components would involve two primary objectives: (1) the hiring of political and communications staffers to develop and execute a political strategy related to redistricting, and (2) the use of the RNC's State Elections Accounts to advance redistricting goals by supporting state legislative candidates nationwide. The Redistricting Account would

support data analysis and map drawing primarily in the following ways: (1) the hiring of data management and census data experts; and (2) the purchasing of hardware and software to support the RNC's redistricting efforts. The Redistricting Account would also support the legal component of the RNC's redistricting efforts through hiring additional in-house legal staff with expertise in redistricting and enabling the RNC to hire outside counsel to assist in redistricting related litigation. Beeson Aff. ¶ 9.

FEC RESPONSE 14: *See supra* FEC Response ¶ 13.

15. The RNC intends to (a) create a Grassroots Lobbying Account, for non-federal funds, (b) solicit non-federal funds into the account, and (c) use those funds to support grassroots lobbying efforts for federal legislation and issues important to the Republican Party's platform. Beeson Aff. ¶ 10.

FEC RESPONSE 15: *See infra* FEC Response ¶ 16.

16. The RNC intends to use the Grassroots Lobbying Account to pay for radio, television, and internet grassroots lobbying advertisements on relevant public-policy issues. The first two issues the RNC would like to address are issues being debated by the 111th Congress: (1) "card check" legislation, which allows unionization without secret-ballot elections for workers; and (2) legislation to revive the "Fairness Doctrine," which would require radio station owners to provide equal time on matters of public importance or risk losing their broadcast licenses. The following are true and correct copies of ads that RNC intends to broadcast:

Card Check

Secret Ballot

[Text of radio ad]

Today, when workers vote on whether to join a union, they use a secret ballot. Just like we use for any public election. But, some in Congress and their labor union allies want to change that. The "Employee Free Choice Act" is about anything but free choice. The legislation would establish a card check scheme that would strip employees of the right to vote in private when deciding whether to join a union. Under the card check scheme, secret ballot voting is eliminated. Every worker's vote is public. There is no protection against intimidation or coercion, and no guarantee that workers would be able to vote their true wishes. We elect our members of Congress by secret ballot. Why should millions of Americans be stripped of that right? Call [insert Representative/Senator name] and tell him [her] to stand up to the union special interests. Tell him [her] to oppose card check legislation. Viewers see a parent with a child while the parent votes in an election. The parent is teaching the child about the role of the secret ballot in democracy only to have "union goons" grab the parent away from the child and force the parent to vote on whether to form a union in a huge public arena (possibly a game show). The child cries out, "Daddy/Mommy, what happened to democracy?" and the evil game show host says, "Not when it comes to unions, kid."

Fairness Doctrine

Freedom of Speech

[Text of radio ad]

Freedom of speech. One of our most fundamental rights. So, why is it that some in Congress want to censor speech on the airwaves? Do they not trust Americans to think for themselves? Are they that frightened of their critics? The Fairness Doctrine was killed off more than 20 years ago, because it was anything but fair. Yet, some in Congress are pushing legislation to bring the doctrine back and require broadcasters to present opposing viewpoints on controversial issues of public importance. Let's face the facts. The Fairness Doctrine is nothing more than a clear attack on free speech. It would give total control of the public airwaves to the government, and allow the government to dictate the kind of news and opinions that broadcasters choose to air. The freedom of speech is central to our democracy. We must protect it. Call [insert Representative/Senator name] and tell him [her] to tell him [her] to oppose any efforts to bring back the Fairness Doctrine.

Beeson Aff. ¶ 11.

FEC RESPONSE 16: The fact that the RNC hopes to spend some of its money on communications that it characterizes as “grassroots lobbying” is “beside the point,” i.e., not relevant. *See supra* FEC Response ¶ 6 (quoting *McConnell*). If the manner of spending were relevant, the *McConnell* record demonstrated that prior to BCRA — when the RNC was permitted to receive nonfederal funds ostensibly to, *inter alia*, conduct “issue advocacy” — “genuine issue advocacy on the part of political parties [was] a rare occurrence.” 251 F. Supp. 2d at 451 (Kollar-Kotelly, J.). Moreover, the RNC may spend as much of the funds it raises on “grassroots lobbying” as it prefers.

While the precise contours of what the RNC considers to be “grassroots lobbying” are unclear, the record demonstrates that the RNC’s request to fund “grassroots lobbying” with soft money would open the door to precisely the same kind of “issue advertising designed to influence federal elections” about which Congress and the Supreme Court were concerned. *See McConnell*, 540 U.S. at 131. The RNC has testified that several communications that this Court found in *McConnell* to be sham issue ads — i.e., “so-called ‘issue ads’” that “were actually electioneering advertisements,” *McConnell*, 251 F. Supp. 2d at 826 (Leon, J.) — would

constitute “grassroots lobbying” under the RNC’s definition of that term. (*Compare* Josefiak Dep. 164:8-22 (FEC Exh. 1) (testifying that RNC’s “Taxed Too Much” ad is grassroots lobbying), 170:14-171:19 (same for RNC’s “More” ad), *with McConnell*, 251 F. Supp. 2d at 446 (Kollar-Kotelly, J.) (including both ads in list of sham issue ads), 826 (Leon, J.) (same); *see also* ODP0029-00041 (FEC Exh. 5) (text of ad); ODP 0023-02326 (FEC Exh. 6) (same).) And the CRP includes “non-advocacy issue oriented mailings” in its lists of disbursements that “support” candidates. (*See* Pls.’ Stmt. ¶ 39.)

17. The RNC intends to (a) create several State Elections Accounts, for state funds, (b) solicit state funds into the accounts, and (c) use those funds exclusively to support state candidates in various states. The funds would be solicited and spent in accordance with any applicable state law. The RNC intends to support state candidates from this Account in elections where only state candidates appear on the ballot and in elections where both federal and state candidates appear on the ballot. Beeson Aff. ¶ 12.

FEC RESPONSE 17: The fact that the RNC hopes to spend some of its money to support state candidates is “beside the point,” i.e., not relevant, and the RNC may spend as much of its money on state campaigns as it prefers. *See supra* FEC Response ¶ 6 (quoting *McConnell*).

18. The RNC plans to use funds from the State Elections Accounts to make direct contributions to state and local candidates. Several states permit unlimited contributions to candidates and/or corporate contributions to candidates. The RNC is looking to compete on an equal playing field in these states. It will also use these funds for independent expenditures for Republican state and local candidates, specific advertising and direct mail for the entire Republican ballot, and GOTV calls. Beeson Aff. ¶ 13.

FEC RESPONSE 18: *See supra* FEC Response ¶ 17. In addition, the RNC already “compete[s] on an equal playing field” with its Democratic Party equivalent in all relevant financial respects, as the national party committees are subject to identical contribution limits, *see* 2 U.S.C. § 441a(a)(1)(B), and FECA imposes no restrictions on the amount of funds that a national party may spend on any of the activities mentioned in the paragraph. With regard to the RNC’s GOTV activities, *see infra* FEC Response ¶ 45.

The Supreme Court has already held, on the basis of the record in other cases, that the “national parties” are in a “unique position” to serve as “agents for spending on behalf of those who seek to produce obligated officeholders.” *McConnell*, 540 U.S. at 145 (quoting *FEC v. Colorado Republican Fed. Campaign Comm.*, 533 U.S. 431, 452 (2001)). “[T]he differing structures and purposes of different entities may require different forms of regulation in order to protect the integrity of the electoral process,” *id.*, 540 U.S. at 158 (quoting *FEC v. Nat’l Right to Work Comm.*, 459 U.S. 197, 210 (1982)) (internal quotation marks omitted), and Congress was not required to subject the national parties to the exact same rules regarding funding of state and local candidates as other entities that are not as well-situated to serve as conduits for undue influence on federal officeholders.

19. All of these activities using funds from the State Elections Accounts will be aimed at state candidates and state elections. None of the activities will in any way identify, reference, or otherwise depict any federal candidate. Beeson Aff. ¶ 14.

FEC RESPONSE 19: *See supra* FEC Response 18; *infra* FEC Response ¶ 45.

20. The RNC intends to solicit non-federal funds into a Litigation Account. The RNC plans to use funds from the Litigation Account for costs associated with litigation challenging BCRA and other miscellaneous litigation not related to federal elections. Beeson Aff. ¶ 15.

FEC RESPONSE 20: To the extent this paragraph refers to any litigation other than the instant case, it is irrelevant, as Plaintiffs’ complaint alleged that the “litigation account” would “be used *solely* for paying the fees and expenses attributable to this case.” (Compl. ¶ 21 (emphasis added).) In any event, the fact that the RNC hopes to spend some of its money to fund litigation is “beside the point,” i.e., not relevant, and the RNC may spend as much of its money on litigation as it prefers. *See supra* FEC Response ¶ 6 (quoting *McConnell*).

21. The RNC intends to solicit non-federal funds into a Building Account exclusively for maintenance and upkeep of the RNC’s headquarters. Beeson Aff. ¶ 16.

FEC RESPONSE 21: This assertion is irrelevant, as there is no “Building Account” among the activities set forth in Plaintiffs’ complaint. In any event, the RNC raised and lost its “building fund” claim in *McConnell*. See, e.g., *McConnell*, 251 F. Supp. 2d at 332 (Henderson, J.), 462-63 (Kollar-Kotelly, J.), 819 (Leon, J.) (including “building funds” in list of activities RNC financed with soft money prior to BCRA). The fact that the RNC hopes to spend some of its money to fund maintenance and upkeep of its headquarters is “beside the point,” i.e., not relevant, and the RNC may spend as much of its money on its headquarters as it prefers. See *supra* FEC Response ¶ 6 (quoting *McConnell*). Even if the manner of its spending were relevant, the RNC does not even allege that its headquarters activities are unrelated to federal elections, nor could it. Cf. *Cal. Med. Ass’n v. FEC*, 453 U.S. 182, 198 n.19 (1981) (declining to exempt donations for “administrative” purposes from regulation as contributions because organization’s receipt of such donations would free its other funds to be used to influence elections).

22. Before BCRA, non-federal funds were critical to sustaining the RNC’s Building Fund. Since then, the RNC has had to divert federal funds to such uses as replacing the building’s generator and fixing aging elevators. Every dollar of federal funds used for those items takes away from the RNC’s ability to reach out directly to voters and engage new voters in the political process. Beeson Aff. ¶ 17.

FEC RESPONSE 22: See *supra* FEC Response ¶ 21.

23. The RNC is ready and able to do all these activities but cannot because it is permitted to solicit and use only federal funds. So, unless the RNC obtains judicial relief, it will not create any of the above accounts for non-federal and state funds. In addition to the activities listed above, the RNC would like to participate in materially similar activities in the future. Beeson Aff. ¶ 18.

FEC RESPONSE 23: FECA imposes no restrictions on the RNC’s ability to spend its funds on any of the activities the RNC alleges it would like to undertake; thus, the RNC’s assertion that it “cannot” “do all these activities” is an incorrect statement of law. BCRA does

not “in any way limit[] the total amount of money parties can spend. Rather, [it] simply limit[s] the source and individual amount of donations.” *McConnell*, 540 U.S. at 139 (citation omitted). Furthermore, as a factual matter, the RNC has engaged in “all these activities” since BCRA: supporting state candidates, including in elections where no federal candidates were on the ballot (Plaintiff RNC’s Discovery Resps. at 4-5 (FEC Exh. 4)); redistricting (*id.* at 5); grassroots lobbying (Josefiak Dep. 156:22-157:10 (FEC Exh. 1)); and litigation (*id.* 171:20-172:9). To the extent that the RNC has chosen to forego certain activities, that is the result of the RNC’s strategic decision to spend its plentiful federal funds on other elections. (*See id.* 141:10-143:16, 160:12-20.)

24. The RNC will not aid contributors to any of the accounts in obtaining preferential access to federal candidates or officeholders. For example, the RNC will not, in any manner different than or beyond that currently afforded to contributors of federal funds: (1) encourage officeholders or candidates to meet with or have other contact with contributors to these accounts, (2) arrange for contributors to participate in conference calls with federal candidates or officeholders, or (3) offer access to federal officeholders or candidates in exchange for contributions. Furthermore, the RNC will not use any federal candidates or officeholders to solicit funds for any of the Accounts. Beeson Aff. ¶ 19.

FEC RESPONSE 24: The fact that the RNC asserts that it will not itself create an additional program of preferential access is irrelevant. The record in *McConnell* demonstrates that candidates would nevertheless be aware of who the donors are. Although the Court noted the role that officeholders had played in raising soft money for their political parties, the Court also found that, “[e]ven when not participating directly in the fundraising, federal officeholders were well aware of the identities of the donors: National party committees would distribute lists of potential or actual donors, *or donors themselves would report their generosity to officeholders.*” 540 U.S. at 147 (emphasis added). “[F]or a member not to know the identities of these donors, he or she must actively avoid such knowledge as it is provided by the national political parties *and the donors themselves.*” *Id.* (quoting *McConnell*, 251 F. Supp. 2d at 487-

88) (Kollar-Kotelly, J.) (emphasis added); *see also id.* (citing *McConnell*, 251 F. Supp. 2d at 853-55 (Leon, J.)).

The RNC's assertion that it will not provide preferential access as a direct result of donations to its desired soft money accounts is especially irrelevant given that the RNC currently provides its major donors with substantial preferential access to federal candidates and officeholders. Specifically, the RNC organizes private receptions, dinners, and other events at which individuals who have made large contributions (i.e., \$15,000 or more) to the RNC have an opportunity to meet, dine, and speak with federal candidates and officeholders. (*See* Josefiak Dep. 58:18-61:5 (FEC Exh. 1).) These opportunities are "not offered to the public at large." (Pl. RNC's Discovery Resps. at 7 (FEC Exh. 4).) The RNC has created tiers of donors with specified benefits: For example, donors who give \$15,000 receive "intimate luncheons, dinners, and meetings with key policymakers"; donors who give \$30,400 "enjoy exclusive private functions with elected Republican leaders"; and donors who commit to raising \$60,800 receive "at least one . . . exclusive event during the year," as well as other "intimate events with key GOP policymakers." (RNC 000130 (FEC Exh. 7).) All of these benefits involve the privilege of attending events with federal candidates and officeholders, from candidates for the U.S. House to the sitting President of the United States. (*See generally* RNC 000058-000371 (FEC Exh. 8) (invitations to donor events with federal candidates and officeholders).) At these events, an attending donor has an opportunity to inform the federal candidate or officeholder about the donor's opinion on legislation or other issues, and the candidate or officeholder is aware that the person expressing that opinion is a major donor. (*See* Josefiak Dep. 76:14-77:11 (FEC Exh. 1).)

The RNC sets its highest donation tier to correspond to the legal contribution limit; when the contribution limits rise, the RNC increases the size of the donation required to reach the top tier. (*Id.* 102:19-103:6.)

The RNC has no written policy — and gives no written guidance to its employees — against providing donors with preferential access to federal candidates and officeholders. (*Id.* 128:2-5, 184:10-21.) To the extent the RNC has an *unwritten* “policy” on this issue, it is the same policy that was in effect prior to BCRA (*id.* 129:18-21), when the trading of soft money for access ran rampant, *McConnell*, 540 U.S. at 150-52.

The RNC’s statement that it will not “use” federal candidates or officeholders to raise soft money is irrelevant to the actual or apparent corruption arising from soft-money donations. *See id.* at 145-52 (rejecting argument that only funds solicited by federal candidates or officeholders may be subject to regulation).

The party admits that it will provide access to federal candidates and officeholders for soft money contributors, but only to the same extent it provides access to hard money contributors. In *McConnell*, however, the plaintiffs’ own expert, David Primo, testified that assuming money does buy access to or influence over federal officeholders, soft money is more likely to buy access or influence “simply by virtue of the numbers.” Primo Cross Tr. (Oct. 23, 2002) at 162, *McConnell v. FEC*, Civ. No. 02-582 (D.D.C.), Docket No. 344 (May 16, 2003); accord Krasno & Sorauf Expert Rep. at 15 [DEV 1-Tab 2] (“[T]he much greater size of the [soft money] individual donations at issue here pose a proportionately larger risk of influencing their beneficiaries than do contributions of hard money.”); Andrews Decl. ¶ 18 [DEV 6-Tab 1]; Wirthlin Cross Tr. (Oct. 21, 2002) at 57, *McConnell*, Docket No. 344 (May 16, 2003).

“Elected officials know exactly who the big party contributors are.” Rudman Decl. ¶ 12 [DEV 8-Tab 34]; *accord* Simpson Decl. ¶ 5 [DEV 9-Tab 38]; Greenwald Decl. ¶ 11 [DEV 6-Tab 16]. Donation patterns were well-known or easily ascertainable by party officials, officeholders, staff, and opposing lobbyists, through FEC reports or other means. *See McConnell*, 540 U.S. at 148 n.47; *McConnell*, 251 F. Supp. 2d at 488 (Kollar-Kotelly, J) (“[T]here is communication among Members about who has made soft money donations and at what level they have given, and this is widely known and understood by the Members and their staff.”) (quoting CEO Wade Randlett); *id.* at 487 (Kollar-Kotelly, J.), 853-54 (Leon, J.) (“[Y]ou cannot be a good Democratic or a good Republican Member and not be aware of who gave money to the party.”) (quoting Senator Bumpers); *id.* at 487-88 (Kollar-Kotelly, J), 854 (Leon, J.) (“Legislators of both parties often know who the large soft money contributors to their parties are.”) (quoting Senator McCain); *id.* at 487-88 (Kollar-Kotelly, J), 854 (Leon, J.) (donor’s “lobbyist informs the Senator that a large donation was just made”) (quoting Senator Boren). Congressional staffers also know the identities of the big soft money donors. *See id.* at 482 (“Staffers who work for Members know who the big donors are, and those people always get their phone calls returned first and are allowed to see the Member when others are not.”) (quoting Senator Simpson).

Because candidates would know the identities of the parties’ contributors, this Court noted in *McConnell* the threat of corruption that would result, including from contributions for state party use that would benefit federal candidates.

“[T]he federal candidates who benefit from state party use of these funds will know exactly whom their benefactors are; the same degree of beholdenness and obligation will arise; the same distortions on the legislative process will occur; and the same public cynicism will erode the foundations of our democracy — except it will all be worse in the public’s mind because a perceived reform was undercut once again by a loophole that allows big money into the system.”

McConnell, 251 F. Supp. 2d at 467 (Kollar-Kotelly, J.) (quoting Senator Rudman).

All of the foregoing is equally applicable to the CRP and the RPSD. The CRP invites its donors to meet and speak with federal candidates and officeholders, including the President and Vice President (Christiansen Dep. 62:5-25 (FEC Exh. 2)), candidates for President and Vice President (*id.* 54:2-58:16), and many other federal candidates and officeholders (*see id.* 94:24-99:2 (describing state party conventions); *see also id.* 109:22-110:7 (acknowledging that “at a fundraising event, . . . [donors] can have access through that”).). Some of these events have tiered ticket structures, with donors who pay larger amounts receiving more intimate access to the officeholders and candidates, such as at seated dinners, where the officeholders and candidates know that the people with whom they are eating are the largest donors. (*See id.* 54:2-58:16, 94:24-99:2.) The CRP also “strong arms” federal candidates and officeholders into participating in conference calls with major donors. (*Id.* 85:25-86:16.) For example, Senator McCain’s presidential campaign manager held a conference call for the CRP’s major donors (*id.* 91:17-20, 92:23-94:6), and then held a second call for an even more exclusive set of the CRP’s very biggest donors — those who gave over \$25,000 (*id.* 106:19-107:15). The CRP’s Board of Directors — which always includes at least one federal officeholder, *see supra* FEC Response ¶ 2 — is informed of individual “generous donations.” (*Id.* 82:14-83:25.) The CRP does not intend to change its practice of giving access to donors, even if the CRP is permitted to raise and spend soft money on federal election activity. (*See id.* 177:19-178:6.)

Like the RNC, the CRP has a menu of defined benefits for its major donors, promising them that they will “work closely with California’s Republican candidates and officials” and that donors “are well recognized for their important support of the Republican campaign.” California Republican Party, *Golden State Leadership Team*, http://www.cagop.org/index.cfm/golden_state_leadership_team.htm (last visited Mar. 8, 2009)

(FEC Exh. 9); *see also* California Republican Party, *Join the California Republican Party Golden State Leadership Team*,

http://www.cagop.org/pdf/Golden_State_Leadership_Application.pdf (last visited Mar. 8, 2009)

(FEC Exh. 10). The CRP believes that providing these benefits helps the party raise funds.

(Christiansen Dep. 88:10-89:4 (FEC Exh. 2).)

The RPSD also provides its donors with access to federal candidates and officeholders, including at events attended by such candidates and officeholders where donors giving larger amounts receive greater recognition. (Buettner Dep. 20:15-22:2 (FEC Exh. 3); *see also id.* 37:10-38:3, 39:7-9.) Each month, the RPSD holds a meeting that is open to the public but that is followed by a reception to which only major donors and important guests (including federal candidates and officeholders) are invited. (*Id.* 49:2-51:3.) The RPSD also arranges “VIP junkets” to Washington, where major donors meet with members of Congress. (*Id.* 43:23-45:2, 45:24-46:7.) This preferential access is set out in menus of defined benefits, including, “for [the RPSD’s] most generous supporters . . . private, complimentary VIP meetings and events with major Republican leaders and candidates.” RPSD, *Join a Republican Supporter Club or Renew Your Membership*, <https://secure.repweb.net/sandiegorepublicans/donor/> (last visited Mar. 8, 2009) (FEC Exh. 11); *see also* RPSD, *Tony Krvaric, Chairman’s Circle Chair*, http://www.sandiegorepublicans.org/donor/chairmans_circle/ (last visited Mar. 8, 2009) (FEC Exh. 12) (listing benefits for RPSD’s highest donor group). The RPSD’s committee members — including federal officeholders, *see supra* FEC Response ¶ 3 — have access to the RPSD’s internal donor records. (Buettner Dep. 33:20-34:4 (FEC Exh. 3).) The RPSD does not intend to change its practice of giving access to donors, even if the RPSD is permitted to raise and spend soft money on federal election activity. (*See id.* 56:18-23.)

25. Since 2003, the Republican Party, as an institution, has changed due to leadership and staff turnover. Political majorities across the country have also shifted, making certain races more important than others at any given time. For example, Virginia, once a Republican stronghold, went for a Democrat candidate in 2008. *Beeson Aff.* ¶ 20.

FEC RESPONSE 25: No response.

26. As a party, the RNC has lived under BCRA for three cycles. The potential problems the RNC identified in its briefs before the *McConnell* Court are even more acute than anticipated. For example, the rise of 527s (and the resulting failure of the FEC to regulate them) has left the RNC at a fundraising disadvantage for a host of its activities. Similarly, the RNC has been negatively affected by the explosion of internet fundraising, barriers to collaborative relationships between national party and state parties, and inequality of restrictions on a party's ability to raise and spend funds. *Beeson Aff.* ¶ 21.

FEC RESPONSE 26: This statement is vague and ambiguous, as the RNC does not point to any specific "potential problems the RNC identified" in its *McConnell* briefs.

Nonetheless, as to "the rise of 527s,"

[REDACTED]

[REDACTED] There has been no "failure of the FEC to regulate" 527 organizations. *See generally* FEC, *Political Committee Status*, 72 Fed. Reg. 5595

(Feb. 7, 2007) (explaining Commission’s application of political committee statutes and regulations to 527 organizations).

Regarding “the explosion of internet fundraising,” the RNC provides no explanation, much less evidence, of how the ease of raising funds over the internet has harmed the RNC. Instead, the record indicates that the RNC simply has not “been able to compete effectively in that area.” (Josefiak Dep. 185:22-186:12 (FEC Exh. 1); *see also id.* 188:17-189:1 (Q: . . . [T]here’s no reason that the RNC can’t raise hard dollars over the Internet in the same way and with the same effect as any other hard money group, is there? A. Correct. We attempt to raise it. It’s not productive, so the competition is there because others can, and we can’t.”), 83:18-84:5 (“[E]ven though we constantly try to increase . . . the solicitations by e-mail, which is very cost effective, we have not been as successful as the opposition party in generating interest by our donor base to contribute that way.”).)

The RNC’s statement regarding “barriers to collaborative relationships between national party and state parties” is irrelevant, as there is no legal barrier to collaborative fundraising between the RNC and state parties. To the contrary, the RNC raises substantial funds through joint fundraising committees (“JFCs”), which include the RNC, state parties, and candidate campaign committees. (*See, e.g.*, RNC 000106-000110 at 000108, 000110 (FEC Exh. 13) (explaining breakdown of donations to JFC shared by RNC, McCain presidential campaign, and state Republican parties of Colorado, Minnesota, New Mexico, and Wisconsin).) To the extent the RNC’s statement refers to coordinated spending, none of FECA’s restrictions on such spending are at issue in this case.

There is no “inequality of restrictions” between the RNC’s “ability to raise and spend funds” and that of its competitor, the DNC. *See supra* FEC Response ¶ 18.

The RNC predicted in its *McConnell* brief that “[t]he net effects of BCRA will be massive layoffs and severe reduction of . . . speech at the RNC, and reduction of many state parties to a ‘nominal’ existence.” *McConnell*, 251 F. Supp. 2d at 698 (Kollar-Kotelly, J.) (quoting RNC brief). The RNC does not attempt to prove that these predicted problems ever materialized, nor could it.

27. As the current Chairman of the RNC, Mike Duncan intends to (1) solicit contributions of state funds and non-federal funds to RNC’s New Jersey Account, Virginia Account, Redistricting Account, Grassroots Lobbying Account, State Elections Accounts, Building Account, and Litigation Account; (2) solicit contributions of state funds to the California Republican Party; and (3) solicit contributions of state funds to the campaigns of Republican candidates for state office appearing on the November 2009 ballot in New Jersey and Virginia. Duncan Aff. ¶ 3.

FEC RESPONSE 27: *See supra* FEC Response ¶¶ 4 (noting that Duncan is no longer RNC Chairman), 8-22 (responding to statements regarding each soft-money activity); *infra* FEC Response ¶ 31.

28. Duncan intends to make the described solicitations in his official capacity as RNC Chairman on behalf of the RNC, that is., as an “officer or agent acting on behalf of such a national committee.” 2 U.S.C. § 441i(a)(2). Duncan Aff. ¶ 4.

FEC RESPONSE 28: *See supra* FEC Response ¶ 4; *infra* FEC Response ¶ 31.

29. Duncan intends to (a) attend and be a featured guest at state candidate campaign events/fundraisers and solicit contributions for specific state candidates at such events, (b) sign and send letters and emails soliciting such contributions from RNC donors and other potential donors, and (c) make telephone calls to solicit such contributions from RNC donors and other potential donors. Duncan Aff. ¶ 5.

FEC RESPONSE 29: *See supra* FEC Response ¶¶ 4, 8-22; *infra* FEC Response ¶ 31.

30. Duncan will not provide any donor who gives funds in response to the above solicitations with any preferential access to any federal candidate or officeholder. Duncan Aff. ¶ 6.

FEC RESPONSE 30: *See supra* FEC Response ¶ 24; *infra* FEC Response ¶ 31.

31. Duncan is ready and able to do this activity, and would do this activity but for the fact that 2 U.S.C. § 441i(a) makes it a crime. Unless he is able to obtain judicial relief he will not do

this activity. Duncan intends to solicit state funds and non-federal funds in materially similar situations in the future, if permitted. Duncan Aff. ¶ 7.

FEC RESPONSE 31: Duncan’s role in soliciting the planned soft money for the RNC is irrelevant. As the *McConnell* record demonstrates, it does not matter whether party officials or candidates solicit soft money contributions to the national party committees, *see supra* FEC Response ¶ 24. The Court specifically rejected the contention by the dissent that only “contributions made at the express behest of” a candidate created a concern about corruption, 540 U.S. at 152. The *McConnell* record, in fact, demonstrates that many donors gave without being solicited, including, for example, at the suggestion of professional lobbyists as part of a broader plan to obtain influence. As lobbyist Daniel Murray explained (emphasis added),

I advise my clients as to which federal office-holders (or candidates) they should contribute and in what amounts, in order to best use the resources they are able to allocate to such efforts to advance their legislative agenda. *Such plans also would include soft money contributions to political parties and interest groups associated with political issues.*

McConnell, 251 F. Supp. 2d at 495 (Kollar-Kotelly, J.) (citation omitted); *see also id.* (“To have true political clout, the giving and raising of campaign money for candidates and political parties is often critically important.”) (quoting lobbyist Wright Andrews). Similarly, when the Supreme Court discussed the “evidence in the record showing that national parties have actively exploited the belief that contributions purchase influence or protection to pressure donors into making contributions,” it quoted the statement of a CEO who specifically referred to heavy-handed solicitations by lobbyists. *McConnell*, 540 U.S. at 148 n.47. If a corporation had given a lot of money to one side, the CEO explained, “the other side,” i.e., the opposing national party committee, might have “a friendly lobbyist call and indicate that someone with interests before a certain committee has had their contributions to the other side noticed.” *Id.* (quoting Wade Randlett). The national parties are “entities uniquely positioned to serve as conduits for

corruption,” including when donations are made “at the behest of” party officers in their official capacity. *Id.* at 156 n.51.

In addition, *see supra* FEC Response ¶¶ 4 (noting that Duncan is no longer RNC Chairman), 8-22 (responding to statements regarding each soft-money activity). Mr. Duncan — as well as his successor — is free to solicit hard money on behalf of state and local committees and candidates and soft money in his individual capacity or, if he is an official of his state party, in that capacity. *McConnell*, 540 U.S. at 157.

32. California Republican Party (“CRP”) supports Republican nominees for partisan elective offices in general elections, particularly in contested races. CRP is prohibited from and does not support candidates for partisan elective office at primary elections. Thus, CRP’s potential federal candidate support activity does not take place in any regular primary election. CRP also supports candidates for non-partisan offices at the state and local levels. The statewide offices of Insurance Commissioner and Superintendent of Public Instruction are not partisan offices. Local offices are all non-partisan (Art. II, sec. 6(a), Cal. Const.). Christiansen Dec. ¶ 3.

FEC RESPONSE 32: *See supra* FEC Response ¶ 2.

33. California holds its Direct Primary on the first Tuesday after the first Monday in June and its statewide general election on the first Tuesday after the first Monday in November. California holds a standalone Presidential Primary election on the first Tuesday in February in even numbered years divisible by four. CEC § 1202. Christiansen Dec. ¶ 4.

FEC RESPONSE 33: No response.

34. California law permits local jurisdictions to set their election dates and consolidate those elections with the Direct Primary and the statewide general election, so that state and local officer elections may be held on those dates which are regular federal election dates. Candidates for state and local elective offices appear on the ballot with candidates for federal offices. Christiansen Dec. ¶ 4; Buettner Dec. ¶ 5.

FEC RESPONSE 34: No response.

35. Since the enactment of Proposition 34 in 2000, CRP has engaged in substantial support of candidates for partisan offices at the state level, and more recently in the 2006 and 2008 elections, CRP has engaged in local candidate support. This activity included contributions, coordinated expenditures, and member communication expenditures in support of candidates for state offices at elections held in 2002, 2003, 2004, 2006, and 2008, and member communication expenditures in support of candidates for local offices, most of the latter in 2006 and 2008. Christiansen Dec. ¶ 6.

FEC RESPONSE 35: No response.

36. CRP has spent little money supporting federal candidates, either before or after BCRA was adopted, because California has had very few competitive Congressional districts since 2001. As noted above, CRP does not support any federal candidates in primary elections. Christiansen Dec. ¶ 7.

FEC RESPONSE 36: The CRP has “spent . . . money supporting” federal candidates through direct and coordinated expenditures (*see* Pls.’ Stmt. ¶ 38), and through substantial sums spent on federal election activity, including voter registration, voter identification, GOTV, and generic campaign activity, *see infra* FEC Responses ¶¶ 42-45.

37. Because California’s U.S. Senate seats have been held by Democrat incumbents since 1994, CRP has spent little funds on campaign activities in support of Republican nominees for those offices. CRP has not made any significant coordinated expenditures in a U.S. Senate race since 1998. Christiansen Dec. ¶ 8.

FEC RESPONSE 37: *See supra* FEC Response ¶ 36.

38. Because California’s Congressional seats were redistricted in 2001 to virtually eliminate partisan competition at general elections, CRP has not engaged in any substantial contribution or “coordinated expenditures” under 2 U.S.C. § 441a(d) for 2002, 2004, 2006, and 2008. In 2002, CRP contributed \$10,000 to California Congressional candidates that were not in highly contested races. CRP made “coordinated expenditures” totaling \$86,275 to three candidates, one in a contested general election race (CD 22). In 2004, CRP made one \$5,000 contribution in a contested California congressional race, and \$72,650 in coordinated expenditures in support of David Dreier (CD 26) – a race that was not seriously contested. In 2005-2006, CRP made coordinated expenditures of \$11,013 in one special Congressional race (Campbell – CD 48) and in 2006, CRP paid filing fees for 17 Congressional candidates in non-contested races totaling \$27,557, and one coordinated expenditure on behalf of David Dreier (CD 26) totaling \$41,775. In 2007-2008, despite spending \$17,268,249 in federal funds, CRP made no contributions or independent expenditures, and only \$41,660 in coordinated expenditures (Rohrabacher – CD 46) on behalf of federal candidates. Thus, between 2002 and 2008, CRP engaged in coordinated expenditure activity in fewer than four contested general election races out of 216 Congressional elections. After enactment of BCRA’s FEA PASO provisions in 2002, CRP stopped including federal candidates on its slate mailings and stopped identifying federal candidates entirely in absentee ballot application, chase mailings, and similar voter communications for the 2002, 2004, 2006, and 2008 elections. Christiansen Dec. ¶ 9. 12

FEC RESPONSE 38: No response, except to the final sentence of the paragraph. As to the final sentence, the CRP appears to imply that “BCRA’s FEA PASO provision[]” prohibits

the CRP from using state funds to finance certain “voter communications” that “identify[] federal candidates.” However, (a) to the extent these “voter communications” constitute “voter identification, get-out-the-vote activity, or generic campaign activity” in connection with an election in which federal candidates are on the ballot, but do not PASO a federal candidate, the communications must be funded at least in part with federal funds regardless of whether they identify any federal candidate, *see* 2 U.S.C. § 431(20)(A)(ii); (b) a communication is subject to the “PASO provision,” 2 U.S.C. § 431(20)(A)(iii), only if it “promotes or supports . . . or attacks or opposes” a candidate, not merely “identif[ies]” a candidate; (c) BCRA did not take effect until after the 2002 elections; and (d) in any event, the CRP *does* include federal candidates in some of its GOTV slate listings. (*See* Door Hanger, “Elect Our Republican Team” (FEC Exh. 14); *see also* Christiansen Dep. 137:24-139:11 (FEC Exh. 2) (noting that door hanger was distributed).)

39. In 2002, CRP spent \$6,467,968 supporting 16 candidates for state elective offices with endorsement communications (mailings, party slate cards, broadcast and cablecast communications). In 2003-2004, CRP spent \$5,680,352 supporting 46 candidates for state elective offices with endorsement mailings, broadcast and cablecast communications and non-advocacy issue oriented mailings. In 2005-2006, CRP spent \$8,787,102 supporting 36 candidates for state elective offices with endorsement mailings, member communication mailings, broadcast communications, and non-advocacy issue-oriented mailings as well as supporting several dozen candidates for local offices with member communication mailings. In 2007-2008, CRP spent \$5,710,795 supporting 11 candidates for state elective offices with endorsement mailings, member communication mailings, broadcast communications, and non-advocacy issue-oriented mailings, as well as supporting nearly 100 candidates for local offices with member communication mailings. CRP’s expenditures for the support of state and local candidates in four elections totaled \$26,646,217. Christiansen Dec. ¶ 10.

FEC RESPONSE 39: No response, except to note (a) that this paragraph includes disbursements for “non-advocacy issue oriented mailings” in the CRP’s lists of disbursements “supporting” candidates, thereby further confirming the evidence that so-called “grassroots lobbying” does affect candidate elections, *see supra* FEC Response ¶ 16; and (b) that the CRP uses its state and local campaign activities to “further refine the strategies and tactics for [its]

target congressional candidates.” Ron Nehring, *California GOP Chair: Go Local*,

http://www.cagop.org/index.cfm/in-case-you-missed-it_599.htm (Dec. 7, 2008) (FEC Exh. 15).

40. From 2003 to 2008, CRP spent barely more than 1% of the total of \$26,942,147 spent on all candidates for federal candidate support. Christiansen Dec. ¶ 11.

FEC RESPONSE 40: *See supra* FEC Response ¶ 36.

41. CRP has eschewed including any communications that clearly identify federal candidates and contain words that promote, attack, support, or oppose such federal candidates in its state and local candidate support communications, or in its state and local ballot measure endorsement communications, because of BCRA’s requirement that such communications would have to be paid entirely with federal funds under 2 U.S.C. § 441i(b)(2)(B) and 2 U.S.C. § 431(20). According to Bill Christiansen, the Chief Operating Officer of the CRP, using only federal funds for such communications would virtually eliminate CRP’s ability to engage in such state and local candidate and ballot measure activity because of the severe, adverse impact on these fundamental state and local campaign programs. Christiansen Dec. ¶ 12.

FEC RESPONSE 41: The CRP does not allege in this case that it would like to use soft money to fund “state and local candidate support communications” that PASO federal candidates, and so the assertions in this paragraph relating to such communications are irrelevant. In any event, the CRP does clearly identify and promote federal candidates in some of its state and local candidate support communications. *See supra* FEC Response ¶ 38. As to ballot initiative activity, *see infra* FEC Response ¶ 63. Should the CRP ever develop an interest in undertaking any of the activities described in paragraph 41, the declarant’s conclusory assertion that “using only federal funds” for such communications “would virtually eliminate” CRP’s ability to pay for them due to an unexplained “severe, adverse impact” is unsupported and controverted by the considerable sums of federal money the CRP raises each election cycle. (*See* Pls.’ Stmt. ¶ 44.)

42. CRP spent \$7,768,683 on voter registration activities from 2003 to 2008, as reflected on its FEC reports. Of this, a substantial portion, in excess of the federally required minimum percentage, was paid with hard federal dollars. Christiansen Dec. ¶ 13.

FEC RESPONSE 42: *See infra* FEC Response 45. The purpose of the CRP's voter registration activities is to register "as many Republicans as possible" and help elect Republican candidates in federal and state elections. (Christiansen Dep. 121:12-14, 121:23-122:3 (FEC Exh. 2).) The CRP acknowledges that its voter registration activity is intended to — and actually does — affect federal elections. (*Id.* 123:1-17 ("Q: Does the CRP's voter registration activity affect federal elections? A: Yes."); *see also* Phillip J. LaVelle, *For GOP, California Dreamin'?*, 2004 WLNR 17013682, San Diego Union Tribune, Sep. 1, 2004 (FEC Exh. 16) ("[C]hairman of the California Republican Party . . . said Republican registration gains are creating a Bush-friendly environment.")) The RNC has acknowledged that effect, as well:

Q. When a state party . . . conduct[s] voter registration drives, are they designed to register likely Republican voters?

A. Yes.

Q. Doesn't that help Republican candidates for federal office?

A. The hope is, as a lot of these plans refer to it, helps the entire ticket in that state. And whether it's for the legislature or whether it's for governor, whether it's for Congress or the U.S. Senate, if they have any of those races in that particular year, that's the whole purpose behind it and that was really the purpose behind the Federal Election Commission's allocation regulations in the states recognizing based on who was on a ballot in any particular election federal election year. That's how you would allocate resources. There was an acknowledgment that it benefited the entire ticket and how it benefited and what kind of funds were used were based on the categories on those candidates on the ballot.

Q. So it does help federal candidates?

A. It does.

(Josefiak Dep. 26:5-27:8, *McConnell v. FEC*, Civ. No. 02-582 (D.D.C.) (Oct. 15, 2002) (FEC Exh. 17).)

43. CRP spent \$619,372 on voter identification and GOTV activities from 2003 to 2008, as reflected on its FEC reports. All or virtually all of these payments were made with federal funds or federal Levin funds. Christiansen Dec. ¶ 14.

FEC RESPONSE 43: *See infra* FEC Response 45. The purpose of the CRP’s voter identification and GOTV activities is to “get . . . to the polls” all Republicans and Republican-leaning voters (Christiansen Dep. 127:14-25 (FEC Exh. 2)), so that Republican candidates “win on election day” in federal and state races (*id.* at 128:1-4). Accordingly, the CRP acknowledges that its GOTV activities affect federal elections. (*Id.* at 128:24-129:1.) The RNC has acknowledged this as well.

A. . . . Your get-out-the-vote program is to get Republicans and independents and maybe disgruntle[d] democrats to vote for your candidate. So it’s more than just the Republican base. It’s getting the base plus in order to win.

Q. So it’s designed to get people to the polls who you believe will vote Republican?

A. Correct.

Q. And, again, doesn’t that also help Republican candidates for federal office?

A. It helps the ticket and Republican candidates, all Republican candidates for office, federal and non-federal.

(Josefiak Dep. 27:18-28:19, *McConnell v. FEC*, Civ. No. 02-582 (D.D.C.) (Oct. 15, 2002) (FEC Exh. 17).)

44. Between 2003 and 2008, CRP spent \$51,673,117 from its federal account, according to FEC reports. During this same time it spent \$94,395,279 from its non-federal account, of which \$18,595,745 was for transfers to the federal account for allocable activity expenses. Christiansen Dec. ¶ 15.

FEC RESPONSE 44: No response.

45. CRP intends to use state funds to participate in GOTV, voter identification, and voter registration activities, as defined in 2 U.S.C. § 431(20), in future elections for state and local candidates. None of this “Federal election activity” would be targeted to any federal candidate, *i.e.*, it would not reference, describe, or otherwise depict any federal candidate. This activity is prohibited by 2 U.S.C. § 441i(b). Absent the requested judicial relief CRP will not engage in these activities. Christiansen Dec. ¶ 16.

FEC RESPONSE 45: The generic activities the CRP plans to conduct with soft money through these accounts can directly help federal candidates and influence their election. In *McConnell*, the Supreme Court found that voter registration, voter identification, GOTV, and generic campaign activity as defined by BCRA “clearly capture activity that benefits federal candidates” and that “funding of such activities creates a significant risk of actual and apparent corruption.” 540 U.S. at 167-68.

Common sense dictates, and it was “undisputed” below, that a party’s efforts to register voters sympathetic to that party directly assist the party’s candidates for federal office. 251 F. Supp. 2d, at 460 (Kollar-Kotelly, J.). It is equally clear that federal candidates reap substantial rewards from any efforts that increase the number of like-minded registered voters who actually go to the polls. *See, e.g., id.*, at 459 (“[The evidence] shows quite clearly that a campaign that mobilizes residents of a highly Republican precinct will produce a harvest of votes for Republican candidates for both state and federal offices. A campaign need not mention federal candidates to have a direct effect on voting for such a candidate [G]eneric campaign activity has a direct effect on federal elections” (quoting Green Expert Report 14)).

Id.

The views of the CRP and RPSD are consistent with “common sense” and the “undisputed” record in *McConnell*. *See supra* FEC Responses ¶¶ 42, 43 (discussing purpose and effect of voter registration, voter identification, and GOTV activities). Each of the organizational Plaintiffs has conceded that, in an election where both state and federal candidates are on the ballot, *any* GOTV activity inherently affects the federal elections, even if such activity does not specifically mention any of the federal candidates. (Josefiak Dep. 45:7-16 (FEC Exh. 1); Christiansen Dep. 129:25-130:5 (FEC Exh. 2); Buettner Dep. 68:16-21 (FEC Exh. 3).)

In addition, to the extent that any of the CRP’s intended activities constitute “generic campaign activity” 2 U.S.C. § 431(20)(A)(ii) — which is “campaign activity that promotes a

political party and does not promote a candidate or non-Federal candidate” 2 U.S.C. § 431(21) — such activity also influences federal elections. *See* Ron Nehring, *A Republican 50-State Strategy?*, http://www.cagop.org/index.cfm/in-case-you-missed-it_617.htm (Jan. 27, 2009) (FEC Exh. 18) (CRP Chairman’s statement: “Building organizational and communications capability — and expanding the ranks of congressional, state and local officials from our party — makes it more likely a state will be competitive in a presidential election down the road.”); *San Joaquin Republicans Organizing for Dean Andal*, <http://www.cagop.org/blog/2008/09/san-joaquin-republicans-organizing-for.html> (Sept. 12, 2008) (FEC Exh. 19) (CRP Chairman’s blog post noting that Congressional candidate was “benefitting from the organization our volunteer groups have built in the region”).

Finally, the activity described in this paragraph is not “prohibited” by 2 U.S.C. § 441i(b) or any other provision. BCRA merely requires that this federal election activity be financed by the CRP at least in part with federal funds.

46. CRP has spent \$18,130,187 in support of or opposition to statewide ballot measures since 2002. Christiansen Dec. ¶ 17.

FEC RESPONSE 46: *See infra* FEC Response ¶ 63.

47. CRP believes that the endorsement and opposition of ballot measures are enhanced by the ability freely to associate Democrat federal officeholders with ballot measures that CRP opposes, and to associate Republican officeholders with CRP endorsed ballot measures. Christiansen Dec. ¶ 18.

FEC RESPONSE 47: *See infra* FEC Response ¶ 63.

48. At the September 7, 2007 CRP Convention Meeting in Indian Wells, CRP endorsed or opposed a number of ballot measures for the 2008 statewide ballots. In September 2008, it endorsed or opposed several measures that have already qualified to appear on the June 3, 2010 statewide election ballot; and it is likely to endorse and oppose some of the current measures placed on the June 2010 statewide ballot at the February, 2009 Convention Meeting in Sacramento. Christiansen Dec. Memorandum (Jan. 15, 2009).

FEC RESPONSE 48: *See infra* FEC Response ¶ 63.

49. San Diego Republican Party (“SDRP”) supports Republican nominees for partisan elective offices nominated at the Direct Primary. (California Elections Code § 316). However, SDRP does not support candidates for partisan elective offices, including federal Congressional and U.S. Senate offices, in contested partisan primary elections. Buettner Dec. ¶ 3.

FEC RESPONSE 49: *See supra* FEC Response ¶ 3.

50. Local offices are all non-partisan (Art. II, sec. 6(a), Cal. Const.), and SDRP actively supports candidates for local offices, including candidates for city councils, member of the county board of supervisors, and local school districts. Buettner Dec. ¶ 4.

FEC RESPONSE 50: No response.

51. For state offices, under the California Political Reform Act (“CPRA”), political parties are permitted by state policy to support candidates for state elective offices with unlimited contributions, “coordinated expenditures” and “member communications” on their behalf. (CGC §§ 85400(c), 85312.) Political parties are permitted to make unlimited contributions to local candidates where local law does not impose limitations, and unlimited “member communications” on behalf of such candidates, coordinated with the local candidates, irrespective of any local limitations on contributions or independent expenditures. (CGC §§ 85312, 85703.) SDRP has an active program to endorse and support local candidates using member communications and where available, direct contributions. Buettner Dec. ¶ 6; Christiansen Dec. ¶ 5.

FEC RESPONSE 51: No response.

52. For local offices, some jurisdictions have their own local campaign law regulations. San Diego, for example, prohibits business entities including corporations from making any contributions to city candidates or to committees that support city candidates, whether those committees make direct contributions or “independent expenditures.” San Diego Municipal Code § 27.2947. Buettner Dec. ¶ 7.

FEC RESPONSE 52: *See infra* FEC Response ¶ 58.

53. Since the enactment of Proposition 34 in 2000, SDRP has engaged in substantial support of candidates for partisan offices at the state level and local non-partisan candidates. This activity has included a smaller amount of contributions, coordinated expenditures and member communication expenditures in support of statewide candidates on the ballot in 2003, 2004, 2006, and 2008 and state candidates whose jurisdictions include San Diego County, and member communication expenditures for candidates for local offices in all elections since 2001. Buettner Dec. ¶ 8.

FEC RESPONSE 53: No response.

54. Because California's U.S. Senate seats have been held by Democrat incumbents since 1994, SDRP has not spent any funds on campaign activities in support of Republican nominees for those offices. Buettner Dec. ¶ 9.

FEC RESPONSE 54: The RPSD has spent funds supporting candidates for the United States Senate through federal election activity, including voter registration, voter identification, GOTV, and generic campaign activity, *see infra* FEC Response ¶ 62.

55. Because California's Congressional seats were redistricted in 2001 to virtually eliminate partisan competition at general elections, SDRP has not engaged in any substantial contribution or "coordinated expenditures" under 2 USCA §441a(d) for 2002, 2004, 2006, and 2008. Buettner Dec. ¶ 10.

FEC RESPONSE 55: The RPSD has spent funds supporting candidates for the United States House of Representatives through independent expenditures (Pls.' Stmt. ¶ 57) and federal election activity, including voter registration, voter identification, GOTV, and generic campaign activity, *see infra* FEC Response ¶ 62.

56. SDRP inaugurated a local candidate support program in 2002 and has endorsed hundreds of candidates for local offices on endorsement mailings or party slate cards during the elections from 2002-2008. At the November 4, 2008 general election, SDRP endorsed over one hundred candidates for local offices on its endorsement slate mailings. None of these endorsement mailings included any federal candidates because of the restrictions of BCRA, 2 U.S.C. §441i(b)(2)(B) and 2 U.S.C. § 434(20). Buettner Dec. ¶ 11.

FEC RESPONSE 56: FECA does not prohibit the RPSD from "includ[ing] any federal candidates" in slate endorsement mailings or in any other communications; in fact, the RPSD has distributed material promoting federal and state candidates together in every election cycle since BCRA was enacted. (*See* FEC Exh. 20 (RPSD materials); *see also* Buettner Dep. 77:2-79:21 (FEC Exh. 3) (acknowledging that RPSD has distributed materials endorsing federal candidates).)

57. SDRP spent \$861,269 (or 61%) of its \$1,408,617 in expenditures on state and local candidate support activities in 2006. That election cycle did not include a San Diego City mayoral or city attorney race, unlike 2004 and 2008. In 2004, it spent \$1,257,842 (or 69%) of its total of \$1,816,055 in expenditures that election year. In 2008, SDRP spent \$1,927,970 of its

\$2,717,753 total expenditures on expenditures related to state and local candidate support, while it spent only \$2,384 in federal candidate support activity. None of the state and local candidate support activity unambiguously relates to any federal election or candidate. The very limited amount of SDRP's federal candidate support included independent expenditures on behalf of 5 county-jurisdiction congressional candidates (including two safe seats, one open but safe seat, and two Democrat-incumbent seats) and \$550 in contributions to McCain for President. Spending on federal candidates in the 2008 Presidential election amounted to 9/100ths of 1% of the total 2008 expenditures, and 1/10th of 1% of combined federal and state or non-federal expenditures. Buettner Dec. ¶ 12.

FEC RESPONSE 57: In addition to the independent expenditures and contributions to federal candidates noted in this paragraph, the RPSD has supported federal candidates through federal election activity, including voter registration, voter identification, GOTV, and generic campaign activity, *see infra* FEC Response ¶ 62. The RPSD also makes available to some candidates for the House or Representatives the RPSD's file containing voter information.

(Buettner Dep. 89:9-90:2 (FEC Exh. 3).)

58. Because SDRP is required to spend significant federal funds and Levin funds for "Federal election activity," *see* 2 U.S.C. 441i(b), and those same dollars are prized for local uses because of the City of San Diego prohibitions (SDMC 27.2947), SDRP has been precluded from engaging in more local candidate support activity than done from 2003 to 2008. Buettner Dec. ¶ 13.

FEC RESPONSE 58: The SDRP has not been "precluded" from engaging in more local candidate support due to any contribution limit. The SDRP is free to allocate its resources as it sees fit; contribution limits place no cap on the amount that it may spend on any particular activity. To the extent that allowable contributions under City of San Diego's campaign finance laws are comparable to the federal laws, the RPSD has acknowledged that the similarity of the local and federal restrictions means that freeing the RPSD to spend more of its funds on city elections (by permitting the use of soft money for other activities) necessarily means freeing the RPSD to spend more funds on federal elections as well. (*See* Buettner Dep. 84:11-24 (FEC Exh. 3).)

59. SDRP occasionally has endorsed, supported and opposed state and local ballot measures on its member communication mailings that have featured state and local, but not federal candidates. On occasion, SDRP has considered whether or not to include statements that support or attack a federal candidate in order to persuade voters of San Diego County to vote for or against the SDRP position on such ballot measures. However, SDRP has declined to include such language due to the BCRA requirement that such communications, even related to state or local ballot measures, must be paid wholly with hard federal dollars. Buettner Dec. ¶ 14.

FEC RESPONSE 59: *See infra* FEC Response ¶ 63.

60. SDRP would like to support and oppose state and local ballot measures in the future. As part of this effort, SDRP intends to use public communications which clearly identify federal candidates and contain words promoting or opposing such candidates. Tetlow Dec. ¶ 3.

FEC RESPONSE 60: *See infra* FEC Response ¶ 63.

61. SDRP believes that the endorsement and opposition of ballot measures are enhanced by the ability freely to associate Democrat federal officeholders with ballot measures that CRP opposes, and to associate Republican officeholders with SDRP endorsed ballot measures. Tetlow Dec. ¶ 4.

FEC RESPONSE 61: *See infra* FEC Response ¶ 63.

62. SDRP intends to use state funds to participate in GOTV, voter identification, and voter registration activities, as defined in 2 U.S.C. § 431(20), in future elections for state and local candidates. None of this “Federal election activity” would be targeted to any federal candidate, *i.e.* it would not reference, describe, or otherwise depict any federal candidate. This activity is prohibited by 2 U.S.C. § 441i(b). Absent the requested judicial relief, SDRP will not engage in these activities. SDRP intends to use state funds in materially similar situations in the future, if permitted. Tetlow Dec. ¶ 5.

FEC RESPONSE 62: *See supra* FEC Response ¶ 45. As noted above, the RNC and the CRP acknowledge that voter registration, voter identification, GOTV, and generic campaign activity are intended to influence federal elections and do influence such elections. *Id.* ¶¶ 42-45. The RPSD similarly concedes that the purpose of these activities is “to get Republicans elected” at the federal, state, and local levels. (Buettner Dep. 62:5-63:18, 66:3-67:9 (FEC Exh. 3).) The statement that the RPSD “will not engage in these activities” “[a]bsent the requested judicial relief” is inaccurate: The RPSD will continue to conduct all of its voter registration, GOTV, and

generic campaign activities in the same manner that it has conducted them since BCRA was enacted. (*See id.* 76:2-12.)

63. CRP and SDRP intend to support efforts to change the way Congressional redistricting is done in California. To that end, CRP and SDRP intend to use state funds to distribute a Letter which will qualify as a public communication, 2 U.S.C. § 431(22) (“public communication” definition). Although “attack” and “oppose” are undefined in the definition of “federal election activity,” 2 U.S.C. § 431(20)(A)(iii), CRP and SDRP believe that this public communication will “attack” or “oppose” Nancy Pelosi and Barbara Boxer, as these terms are used in the definition of “federal election activity,” and so they are prohibited from using state funds for this communication. 2 U.S.C. § 441i(b)(1). Absent the requested judicial relief, CRP and SDRP will not undertake this activity. CRP and SDRP intend to use state funds in materially similar situations in the future, if permitted. Christiansen Dec. ¶ 19; Tetlow Dec. ¶ 6.

FEC RESPONSE 63: In *McConnell*, the Supreme Court addressed the contentions of state and local parties — including the CRP — regarding BCRA’s requirement that any advertising that promotes, attacks, supports, or opposes a federal candidate by such party committees be funded with hard money. The Court found that, as to the direct effect of such advertising on federal elections, “[t]he record on this score could scarcely be more abundant.” *McConnell*, 540 U.S. at 170. “Such ads were a prime motivating force behind BCRA’s passage,” and “any public communication that promotes or attacks a clearly identified candidate directly affects the election in which he is participating.” *Id.* at 169-70.

The CRP has distributed communications that endorse or oppose state ballot initiatives and identify federal candidates — thus associating the officeholder with the initiative — without promoting or attacking the candidate. (*See California Republican Party, Your Official Orange County Republican Party Endorsements* at 5 (FEC Exh. 21) (listing members of Congress endorsing ballot proposition).) Regarding the other assertions in this paragraph, *see supra* FEC Response ¶¶ 13 (redistricting), 16 (grassroots lobbying).

The CRP and SDRP's decision not to send out the proposed letters is the preferred allocation of those entities' accumulated federal funds, rather than the result of any requirement of BCRA.

64. The text of the Letter that CRP and SDRP wish to distribute is:

Dear *****:

Nancy Pelosi and Barbara Boxer don't want you to read this letter. They want to keep California voters from effectively choosing their Congressional representatives.

The Democrats seek to preserve their stranglehold on California's government and perpetuate the gerrymandered Congressional districts that allow fifty thousand voters to elect a Democrat to Congress from District 43 while over one hundred and twenty thousand voters are required to elect a Republican to Congress in each of Districts 2, 3, 4, 22, 24, 46, and 48 – ample proof of the maxim that under our current, scandalous redistricting system in California “the voters don't choose their representatives, the representatives choose their voters.”

The California Constitution allows State Legislators to draw the political boundaries in the state. This means Legislators get to draw the boundaries for the Assembly, State Senate, and Congressional districts. In essence, this allows the Legislators to determine what voters they want to represent in order to guarantee themselves, and their political party, re-election.

Political boundaries are re-drawn every ten years. In 2001, the State Legislators used new, hi-tech computers to draw up the political boundaries and guarantee themselves and their party re-election year after year. These computers did such a good job that a seat has switched hands from one political party to another only 3 times in the last six years, despite the fact that the People of California have a less favorable opinion of the State Legislature and Congress than at any other point in modern history.

When politicians are guaranteed re-election, they stop listening to the People and act out of their own self-interest. A lack of competitive elections has led to do-nothing legislative gridlock and Legislators overspending our tax dollars in order to pay back their political contributors.

We need to make a change, but Nancy Pelosi and Barbara Boxer will do everything they can to stop a change from happening. Help us take a stand for fairness and accountability in California elections. Support us in our effort to qualify a ballot measure that will give the power of drawing political boundary lines to the People and make elections competitive again. Help bring democracy back to California.

You can help the California Republican Party in this effort by making your contribution to our initiative qualification efforts. Please give \$100, \$25, or whatever you can to support this effort. With your help, we can begin the process of making California government about the People, not the politicians. Christiansen Dec. Memorandum and Letter (Jan. 15, 2009); Tetlow Dec. ¶ 6.

FEC RESPONSE 64: *See supra* FEC Response ¶ 63.

Respectfully submitted,

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999 E Street NW
Washington, DC 20463
(202) 694-1650

Dated: March 9, 2009

FEC Exhibit 1

Condensed Transcript

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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REPUBLICAN NATIONAL	:	
COMMITTEE, et al.,	:	
	:	Civ. No: 08-1953
Plaintiffs	:	(BMK, RJL, RMC)
	:	
-vs-	:	Pages 1 - 266
	:	
FEDERAL ELECTION COMMISSION,	:	
	:	
Defendant	:	
-----	X	

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Deposition of Thomas J. Josefiak
Washington, D.C.
Tuesday, March 3, 2009

Reported by: Kathleen M. Vaglica, RMR
Job No: 30029



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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

-----X

REPUBLICAN NATIONAL :
COMMITTEE, et al., :
Plaintiffs : Civ. No: 08-1953
: (BMK, RJL, RMC)

-vs- : Pages 1 - 266

FEDERAL ELECTION COMMISSION, :
Defendant :

-----X

Deposition of Thomas J. Josefiak
Washington, D.C.
Tuesday, March 3, 2009

Reported by: Kathleen M. Vaglica, RMR
Job No: 30029

3

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2

1 March 3, 2009

2 (1:03 p.m.)

3

4 Deposition of Thomas J. Josefiak, held at the

5 offices of:

6

7 Federal Election Commission

8 999 E Street, N.W.

9 Washington, D.C. 20463

10

11

12 Pursuant to notice, before Kathleen M. Vaglica, RMR,

13 a Notary Public in and for the District of Columbia.

14

15

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22

4

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14 *Exhibit E was marked in the Confidential portion of

15 the transcript.

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1 PROCEEDINGS

2 Thereupon,

3 Thomas J. Josefiak,

4 a witness, called for examination by counsel for the

5 Defendant and, after having been sworn by the

6 notary, was examined and testified as follows:

13:03:25 7 EXAMINATION BY COUNSEL FOR THE DEFENDANT

13:03:25 8 BY MR. NOTI:

13:03:28 9 Q. Good afternoon, Mr. Josefiak.

13:03:30 10 A. Hello.

13:03:31 11 Q. Did I pronounce it correctly?

13:03:33 12 A. Correct.

13:03:33 13 Q. My name is Adav Noti. I'm with the

13:03:36 14 Federal Election Commission. This is Kevin Deely,

13:03:38 15 also with the FEC, and with us are Lauren Baer and

13:03:42 16 Francesco Valentine from Wilmer Hale. They

13:03:45 17 represent Representative Van Hollen in this case.

13:03:50 18 Would you state your full name and business address

19 for the record?

20 A. Thomas John Josefiak. I'm currently a

21 partner at Holtzman Vogel Law, and we're out in

22 Warrenton, Virginia. 30 Alexandria Pike I believe

8

1 is the correct address.

2 Q. And have you ever been deposed before?

3 A. Yes, I have.

4 Q. How many times?

5 A. Two to my knowledge that I can recall.

6 Q. And one was in McConnell; correct?

7 A. Both were in McConnell.

8 Q. Have you conducted depositions?

9 A. Not personally, no. I've been part of a

10 team, but never conducted a deposition.

11 Q. So just to go through the ground rules,

12 I'll ask you a series of questions, and the court

13 reporter will take down my questions and your

14 answers, so it's important that you answer verbally

15 and not with nods or gestures. Okay?

16 A. Correct.

17 Q. If you don't hear or understand a

18 question, please tell me so I can restate it. If

19 you answer a question, I'll assume you heard and

20 understood the question. Okay?

21 A. Correct.

22 Q. Since the court reporter can only take



9	1 down one person's words at a time, please let me 2 finish my question before you answer, even if you 13:05:01 3 know the answer before I am finished. 13:05:05 4 A. I will do so. 13:05:06 5 Q. Thank you. If you need a break at any 13:05:08 6 time, please let me know, and we can take one. I 13:05:11 7 only request that you not take a break while a 13:05:14 8 question is pending. 13:05:15 9 A. All right. 13:05:15 10 Q. Is there any reason you can't give 13:05:17 11 truthful and accurate testimony today? 13:05:18 12 A. No. 13:05:19 13 Q. Do you have any questions for me before we 13:05:21 14 begin? 13:05:21 15 A. I don't believe so. 13:05:22 16 Q. Okay. I'd like to ask the court reporter 13:05:31 17 to mark this as Exhibit A, please. 13:05:33 18 (Deposition Exhibit No. A, Document, was 19 marked for identification and retained by counsel.) 20 BY MR. NOTI: 21 Q. Are you familiar with this document? 22 A. Yes, I am.	11	1 Q. What was the purpose of those 2 conversations? 13:06:57 3 A. Just to reenforce what I knew about the 13:07:04 4 proceedings of the commission going forward. 13:07:10 5 Q. Other than with counsel and the divisions 13:07:15 6 that you mentioned, did you discuss the deposition 13:07:17 7 with anyone else? 13:07:18 8 A. No, I have not. 13:07:19 9 Q. Other than documents that your lawyers may 13:07:25 10 have shown you, have you reviewed or prepared any 13:07:28 11 documents in preparation for the deposition? 13:07:30 12 A. Only documents that are on the public 13:07:32 13 record, for example, FEC reports. 13:07:35 14 Q. Were there any other types of public 13:07:39 15 documents that you reviewed? 13:07:40 16 A. I reviewed documents on the Virginia 13:07:47 17 website and also New Jersey website. 13:07:50 18 Q. The Virginia campaign finance website? 19 A. Yes. 20 Q. And the same for New Jersey? 21 A. Correct. 22 Q. Where do you currently work?
10	1 Q. Are you aware that you're here today as 2 the organizational designee of the Republican 13:06:12 3 National Committee to answer questions about the 13:06:13 4 topics listed on the last two pages of the document? 13:06:16 5 A. Yes. 13:06:17 6 Q. And are you aware that the topics include 13:06:19 7 not just the RNC's past activities, but its plans 13:06:23 8 for the future? 13:06:24 9 A. Yes. 13:06:24 10 Q. And are you prepared to testify both as to 13:06:28 11 past activities and future plans? 13:06:30 12 A. Yes. 13:06:31 13 Q. Did you have any meetings to prepare for 13:06:34 14 today's deposition? 13:06:35 15 A. Yes. 13:06:35 16 Q. With whom did you meet? 13:06:36 17 A. With the counsel. 13:06:39 18 Q. Other than with counsel, did you speak 19 with anyone else about this deposition? 20 A. Yes. Various individuals from the Finance 21 Division, the Admin Division, Communications 22 Division.	12	1 A. Holtzman Vogel Law. 2 Q. And what is your title there? 13:08:09 3 A. I'm a partner. 13:08:10 4 Q. How long have you been a partner at 13:08:13 5 Holtzman Vogel? 13:08:14 6 A. Since September 23, 2008. 13:08:17 7 Q. Where were you employed prior to 13:08:29 8 September 23, 2008? 13:08:30 9 A. At the Republican National Committee. 13:08:33 10 Q. What was your title there? 13:08:34 11 A. At the time, I was Of Counsel. 13:08:36 12 Q. What were your responsibilities as Of 13:08:42 13 Counsel? 13:08:43 14 A. To provide overall legal advice based on 13:08:47 15 my experience at the RNC. 13:08:54 16 Q. Provide advice to whom? 13:08:55 17 A. The Chief Counsel. 13:09:00 18 Q. Who was the Chief Counsel at the time? 19 A. Sean Cairncross. 20 Q. And how long were you Of Counsel at the 21 RNC? 22 A. Probably -- let me think. From January



<p style="text-align: center;">13</p> <p>1 of 2007.</p> <p>2 Q. And prior to January 2007?</p> <p>13:09:35 3 A. I was Chief Counsel.</p> <p>13:09:37 4 Q. With the RNC?</p> <p>13:09:38 5 A. Correct.</p> <p>13:09:39 6 Q. And what were your responsibilities as</p> <p>13:09:42 7 Chief Counsel?</p> <p>13:09:43 8 A. Provide legal advice to the RNC.</p> <p>13:09:50 9 Q. How long were you Chief Counsel?</p> <p>13:09:52 10 A. From approximate, from 1995 through that</p> <p>13:10:01 11 period of time.</p> <p>13:10:02 12 Q. Did you have an official position with the</p> <p>13:10:06 13 Republican National Convention, the 2008 Republican</p> <p>13:10:10 14 National Convention?</p> <p>13:10:10 15 A. Yes, I did. I was Of Counsel.</p> <p>13:10:14 16 Q. And when was that?</p> <p>13:10:16 17 A. I can't -- sometime in 2008.</p> <p>13:10:27 18 Q. Did you leave the RNC at some point</p> <p>19 between 1995 and 2008?</p> <p>20 A. Yes, I did.</p> <p>21 Q. And when was that?</p> <p>22 A. I believe it was June of 2003.</p>	<p style="text-align: center;">15</p> <p>1 comprised of three members from each state and</p> <p>2 territory. There is an election or selection for</p> <p>13:12:10 3 national committeeman and national committeewoman,</p> <p>13:12:14 4 and that occurs during the Presidential primary</p> <p>13:12:17 5 process in the Presidential election year.</p> <p>13:12:21 6 Those members that are elected serve for</p> <p>13:12:26 7 four-year term from the adjournment of one</p> <p>13:12:29 8 convention to the adjournment of the next</p> <p>13:12:33 9 convention. The third member from the state is the</p> <p>13:12:37 10 State Chairman from that particular state. They are</p> <p>13:12:42 11 viewed as ex-officio members, and they serve only as</p> <p>13:12:48 12 long as their term as Chairmen exists. That is sort</p> <p>13:12:55 13 of the overriding organizational process.</p> <p>13:13:18 14 MR. NOTI: I'd like to ask the court</p> <p>13:13:20 15 reporter to mark this as Exhibit B please.</p> <p>13:13:22 16 (Deposition Exhibit No. B, Rules of the</p> <p>17 Republican Party, was marked for identification and</p> <p>13:13:35 18 retained by counsel.)</p> <p>19 BY MR. NOTI:</p> <p>20 Q. Are you familiar with this document?</p> <p>21 A. I most certainly am.</p> <p>22 Q. What is it?</p>
<p style="text-align: center;">14</p> <p>1 Q. Until -- when did you return to the RNC?</p> <p>2 A. I believe it was February of 2005.</p> <p>13:11:03 3 Q. And what did you do during that time</p> <p>13:11:05 4 period?</p> <p>13:11:05 5 A. I was General Counsel to the Bush-Cheney</p> <p>13:11:11 6 '04 Committee.</p> <p>13:11:13 7 Q. The Campaign Committee?</p> <p>13:11:15 8 A. Correct.</p> <p>13:11:16 9 Q. And what were your responsibilities as</p> <p>13:11:18 10 General Counsel to the Bush Cheney campaign?</p> <p>13:11:21 11 A. Provide legal advice and guidance for the</p> <p>13:11:24 12 reelection.</p> <p>13:11:24 13 Q. And you were Commissioner of the FEC;</p> <p>13:11:29 14 correct, from 1985 to '91?</p> <p>13:11:32 15 A. Correct.</p> <p>13:11:33 16 Q. And you were the Chairman in '88?</p> <p>13:11:35 17 A. Correct.</p> <p>13:11:36 18 Q. Would you please explain the</p> <p>19 organizational structure of the RNC kind of starting</p> <p>20 at the top?</p> <p>21 A. The RNC is a, made up of 168 members</p> <p>22 representing all states and territories. It is</p>	<p style="text-align: center;">16</p> <p>1 A. It's the rules of the Republican party.</p> <p>2 Q. Is this the most current version of the</p> <p>13:13:55 3 rules?</p> <p>13:13:56 4 A. Without the cover sheet, I can't tell you</p> <p>13:14:02 5 because each convention creates a new set of rules,</p> <p>13:14:07 6 and the most recent set would have been adopted at</p> <p>13:14:11 7 the 2008 Republican National Convention.</p> <p>13:14:14 8 Q. If I represent to you that I got this by</p> <p>13:14:19 9 clicking on the rules link on the RNC's website,</p> <p>13:14:23 10 would that then be the most current version of the</p> <p>13:14:26 11 rules?</p> <p>13:14:27 12 A. I would think that it would be.</p> <p>13:14:31 13 Q. Do these rules accurately reflect the</p> <p>13:14:35 14 organizational structure of the RNC?</p> <p>13:14:39 15 A. From the member's perspective and the</p> <p>13:14:43 16 authority of the members, yes.</p> <p>13:14:44 17 Q. Are there ways in which it does not</p> <p>13:14:47 18 accurately reflect the structure of the RNC?</p> <p>19 A. The structure of the RNC? I don't</p> <p>20 understand what you mean by RNC is my problem.</p> <p>21 Q. I'm sorry. I was using the term RNC to</p> <p>22 include not just the committee itself, but also the</p>



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1 in place to raise certain amounts of money. That
2 would be sort of the idea of the plan, but it's not
13:31:16 3 a, like a budget.
13:31:19 4 Q. Understood. How does the Finance
13:31:25 5 Committee transmit its recommendations to the
13:31:27 6 Chairman?
13:31:30 7 A. The relationship between the Finance
13:31:32 8 Chairman, which is an appointment by the Chairman,
13:31:38 9 is an informal and ongoing one. It is a constant
13:31:44 10 communication process where there is no formal
13:31:47 11 meeting, but it could be a visit. It could be a
13:31:50 12 telephone call. It could be a number of ways where
13:31:56 13 there's this constant flow of information back and
13:31:58 14 forth.
13:31:59 15 Q. And the division that you mentioned, maybe
13:32:04 16 not division, but the distinction between major
13:32:07 17 donor fund raising and low dollar fund raising, is
13:32:16 18 that, is that division always part of the RNC's
19 fund-raising plan?
20 A. Yes. It's the Finance Division of the RNC
21 that raises all of the resources.
22 Q. And does the Finance Division distinguish

26

1 between major donor fund raising and low dollar fund
2 raising?
13:32:39 3 A. Within the division, yes.
13:32:40 4 Q. Are there specific staff assigned to each?
5 A. Yes.
13:32:50 6 Q. How many staff are assigned to major donor
13:32:54 7 fund raising?
13:32:57 8 A. There is at least one division, one
13:33:01 9 department director for each of the major donor, and
13:33:06 10 each of those divisions has finance staff backup.
13:33:14 11 Q. Are those dedicated finance staff backup?
13:33:17 12 A. Yes.
13:33:17 13 Q. And what about the low dollar fund
13:33:25 14 raising? How is that staffed?
13:33:27 15 A. Basically the same way. There is a head
13:33:29 16 of that department with a series of other Finance
13:33:33 17 Division employees responsible for implementing the
13:33:36 18 direct mail program or the e-mail program or the
19 phone program.
20 Q. Okay. What -- is there a financial
21 distinction between what makes someone a major donor
22 versus a low dollar donor?

27

1 A. Yes.
2 Q. What is the distinction?
13:33:59 3 A. The major donor programs begin at a level
13:34:02 4 of \$1,000.
13:34:09 5 Q. Other than the Finance Committee and the
13:34:16 6 Chairman, who else at the RNC plays a role in
13:34:19 7 developing fund-raising strategy?
13:34:21 8 A. The Director of the Finance Division.
13:34:29 9 Q. Anybody else?
13:34:47 10 A. No, not to my knowledge.
13:34:51 11 Q. And who is charged with actually
13:34:55 12 implementing the fund-raising plan once it's
13:34:57 13 developed?
13:34:58 14 A. The RNC Finance Division.
13:35:03 15 Q. Is there a distinction in the fund-raising
13:35:15 16 plan between fund raising for federal elections
13:35:18 17 versus state elections?
13:35:24 18 A. No.
19 Q. Does the RNC have any fund-raising
20 strategies or plans that are specific to raising
21 funds for state elections?
22 A. No.

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1 Q. Back when the RNC did have those -- or
2 excuse me. Prior to BCRA, did RNC have fund raising
13:36:04 3 specifically for state elections?
13:36:06 4 A. Yes.
13:36:06 5 Q. When that existed, who was responsible for
13:36:10 6 developing those plans?
13:36:11 7 A. It was still the Finance Division, but a
13:36:17 8 separate department.
13:36:19 9 Q. Separate from what?
13:36:22 10 A. Separate from federal fund raising.
13:36:26 11 Q. Does the Finance Committee make any
13:36:40 12 decisions or recommendations as to spending?
13:36:43 13 A. No.
13:36:44 14 Q. Who are the RNC's officers?
13:37:00 15 A. The current Chairman is Michael Steele,
13:37:05 16 who is not a member of the RNC. The co-Chairman is
13:37:09 17 Jan Lanmer, national committeewoman from Wyoming.
13:37:13 18 The Treasurer is Randy Pullen, state Chairman from
19 Arizona, and the Secretary is Sharon Day, national
20 committeewoman from Florida.
21 Q. Beginning with the Chairman, is that a
22 full-time position?



29	1 A. Yes. 2 Q. Is it a paid position? 13:37:38 3 A. Yes. 13:37:39 4 Q. And Michael Steele has been Chairman 13:37:46 5 since – 13:37:46 6 A. January 30th, 2009. 13:37:54 7 Q. What are the Chairman's responsibilities? 13:37:57 8 A. Be the Chief Executive Officer of the 13:38:00 9 Republican National Committee. 13:38:02 10 Q. In practice day to day what does the 13:38:12 11 Chairman do? 13:38:13 12 A. The Chairman in practice on a day-to-day 13:38:16 13 basis runs the Republican National Committee and 13:38:18 14 makes decisions on behalf of party headquarters. 13:38:21 15 Q. And who was the Chairman before Michael 13:38:25 16 Steele? 13:38:25 17 A. Robert Mike Duncan. 13:38:28 18 Q. And when did his Chairmanship end? 19 A. The Chairmanship ended the day Michael 20 Steele was elected. 21 Q. Does a former Chairman of the RNC have any 22 official responsibilities?	31	1 will be. It varies from administration to 2 administration. 13:40:08 3 Q. Sort of like Vice President of the United 13:40:11 4 States? 13:40:11 5 A. Correct. 13:40:13 6 Q. Is the co-Chair position a paid position? 13:40:18 7 A. Yes. 13:40:19 8 Q. Is it full time? 13:40:19 9 A. Yes. 13:40:20 10 Q. There are eight Vice Chairs; correct? 13:40:26 11 A. Correct. 13:40:27 12 Q. Are they officers of the RNC? 13:40:32 13 A. They are Vice Chairmen of the RNC, but 13:40:35 14 they serve in a different capacity than the other 13:40:37 15 officers. 13:40:38 16 Q. What capacity or how does their capacity 13:40:40 17 differ? 13:40:41 18 A. They represent the regions of the country 19 from which they were elected, and they will run 20 regional meetings for their region. 21 Q. Is a Vice Chair position a full-time 22 position?
30	1 A. Not as a former Chairman. 2 Q. Does a former Chairman have any authority 13:38:55 3 over activities that his successor may decide to do 13:39:02 4 or not do? 13:39:02 5 A. Not as a former Chairman. 13:39:04 6 Q. But he may have responsibilities if he 13:39:09 7 remains a member of the RNC; correct? 13:39:11 8 A. Correct. 13:39:12 9 Q. Is Mr. Duncan still a member of the RNC? 13:39:15 10 A. Yes. 13:39:15 11 Q. Does he have any leadership role? Does he 13:39:23 12 Chair a committee, anything like that? 13:39:25 13 A. No, not at this point. 13:39:28 14 Q. Do you expect him to have such a role in 13:39:35 15 the future? 13:39:35 16 A. I can't speculate. 13:39:36 17 Q. What are the co-Chair's responsibilities? 13:39:42 18 A. Co-Chair is elected by the membership to 19 serve in the capacity as the co-Chair. Under party 20 rules the co-Chairman, has to be of the opposite sex 21 of the Chairman, and the co-Chairman works with the 22 Chairman to develop what the role of that office	32	1 A. They are volunteer positions. They are 2 elected for a term, but they are volunteers. 13:41:07 3 Q. So they are otherwise employed? 13:41:09 4 A. Yes. 13:41:10 5 Q. What are the Secretary's responsibilities? 13:41:16 6 A. Basically again to be worked out, but 13:41:21 7 there are some obvious responsibilities. Take roll 13:41:25 8 calls at meetings, make sure there is a quorum. 13:41:29 9 Under the rules there are certain documents that are 13:41:32 10 submitted to the Secretary of the committee, for 13:41:35 11 example, any resolutions, that sort of thing. 13:41:42 12 During a convention there are documents on 13:41:43 13 delegates, etc., that need to be addressed to the 13:41:46 14 Secretary. There is a formal role, but there can be 13:41:49 15 an informal role as well. 13:41:51 16 Q. What about things like meeting agendas and 13:41:55 17 meeting minutes? Does a Secretary have 13:41:58 18 responsibility regarding them? 19 A. No. 20 Q. Who, if anyone, is responsible for 21 meeting, for compiling meeting minutes? 22 A. It is a function of the Member Relations



<p style="text-align: center;">41</p> <p>1 A. Like all other divisions within the RNC, 2 there is interaction between and among the divisions 13:54:25 3 based on the fact of the goal at the end of the day. 13:54:32 4 The Political Director would perhaps engage with the 13:54:38 5 Finance Division, for example, when the Finance 13:54:42 6 Division was having an event in a particular state 13:54:46 7 with a particular VIP and there would be some need 13:54:51 8 to involve political shop to make sure that proper 13:54:57 9 protocol was followed to insure that the state party 13:55:01 10 would be notified of a pending RNC event or perhaps 13:55:07 11 Finance Division may be asking the Political 13:55:10 12 Division to assist in obtaining some VIP to be 13:55:15 13 present at an event around the country. 13:55:21 14 Q. When you refer to VIP's, to whom are you 13:55:25 15 referring? 13:55:26 16 A. Members of Congress, Senators, perhaps a 13:55:36 17 celebrity of some sort that may be from a particular 13:55:39 18 region where the finance event was going to take 19 place. 20 Q. So the Finance Committee or staff might 21 ask the Political Director to help get a member of 22 Congress to attend a fund-raising event?</p>	<p style="text-align: center;">43</p> <p>1 A. For Republican candidates to win 2 elections, correct. 13:57:23 3 Q. And does that include both state and 13:57:25 4 federal candidates? 13:57:27 5 A. The Republican National Committee is a 13:57:31 6 national party, not a federal party. And even 13:57:35 7 though it has to use federal funds, it is, its goal 13:57:40 8 is to help elect Republicans, whether they be 13:57:43 9 federal candidates or state candidates. 13:57:45 10 Q. Going back to the Political Director, does 13:57:57 11 he play a role in deciding how the RNC spends its 13:58:02 12 funds? 13:58:06 13 A. Yes. 13:58:06 14 Q. What role does he play? 13:58:10 15 A. Helps to develop a so-called Victory Plan 13:58:17 16 that will be implemented to win elections. 13:58:21 17 Q. What does a Victory Plan consist of? 13:58:24 18 A. A Victory Plan consists of a budget, how 19 much of that budget would be spent in direct 20 candidate support, how much of that budget would be 21 spent in general generic I should say GOTV, Get Out 22 the Vote operations.</p>
<p style="text-align: center;">42</p> <p>1 A. Or more likely somebody from that region. 2 For example, if there was an event in Florida to 13:56:05 3 perhaps, if they had any ability or knowledge of the 13:56:09 4 person to contact in Governor Chris's office to 13:56:13 5 attend one of our major donor events in West Palm 13:56:16 6 Beach, something like that. 13:56:17 7 Q. Might the same request include a member of 13:56:24 8 Congress from that region or a Senator from Florida? 13:56:28 9 A. Probably not because, obviously, they are 13:56:32 10 in Washington. 13:56:33 11 Q. Oh, I see. You mentioned the goal at the 13:56:45 12 end of the day for the RNC. What is that goal? 13:56:50 13 A. To win elections, to get the party message 13:56:53 14 out, to establish the ability to make sure the 13:56:58 15 American people have an understanding of what the 13:57:00 16 philosophical position of the party is at any given 13:57:04 17 time on any given issue. 13:57:06 18 Q. When you say to win elections, what do you 19 mean? 20 A. To win elections. 21 Q. Do you mean for Republican candidates to 22 win elections?</p>	<p style="text-align: center;">44</p> <p>1 Q. And who besides the Political Director 2 develops the Victory Plan? 13:58:59 3 A. In combination of other members of the 13:59:02 4 Political Division team, certainly the Chairman 13:59:09 5 sitting down with members of his immediate staff, 13:59:19 6 state parties and, obviously, candidates. 13:59:24 7 Q. How are state parties involved in the 13:59:30 8 development of the Victory Plan? 13:59:32 9 A. State parties are involved by sitting at 13:59:38 10 the table with the RNC and determining in 13:59:42 11 competitive races what is a realistic budget that 13:59:47 12 can be raised and how that budget should be spent in 13:59:51 13 a way that, as best we can determine, assures 13:59:55 14 victory. 13:59:56 15 Q. And are state parties involved in federal 14:00:03 16 races or state races or both? 14:00:06 17 A. The state parties by their very nature are 14:00:09 18 involved in both. 19 Q. I'm sorry. Poor question. In preparing 20 the Victory Plan do state parties develop plans in 21 relation to federal races within their states or 22 state races within their states or both?</p>



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1 A. Concentration, obviously, at the national
 2 level is federal races since we are raising federal
 14:00:37 3 dollars, but there are, there are situations where
 14:00:42 4 nonfederal races certainly are impacted,
 14:00:45 5 particularly in the generic Get Out the Vote
 14:00:49 6 efforts.
 14:00:50 7 Q. How does generic Get Out the Vote affect
 14:00:55 8 state races?
 14:00:56 9 A. When you ask the potential voter to go out
 14:01:00 10 and vote for the Republican team, it affects state
 14:01:03 11 races.
 14:01:04 12 Q. Does it affect federal races also?
 14:01:07 13 A. Sure.
 14:01:08 14 Q. Does it affect whatever races are on, on
 14:01:14 15 the ballot for that election?
 14:01:15 16 A. If they are Republicans, yes.
 14:01:19 17 Q. What role do candidates play in the
 14:01:24 18 development of the Victory Plan?
 19 A. Obviously, they have a seat at the table
 20 to determine from their perspective what their
 21 budgets will be and what can legally be spent in a
 22 coordinated fashion with them and what can be

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1 absorbed by the national party under coordinated
 2 expenditure rules, what can be absorbed by the state
 14:01:48 3 either under coordinated expenditure rules or the
 14:01:52 4 volunteer exemptions to determine how much overall
 14:01:56 5 there is to spend to win that particular election.
 14:01:58 6 Q. Does the RNC reach out to the candidates
 14:02:04 7 to get them involved or how do they become involved
 14:02:08 8 in the process of developing the Victory Plan?
 14:02:11 9 A. Well, they get either directly or
 14:02:14 10 indirectly through either the Republican National,
 14:02:18 11 the Congressional Committee, the RNCC, National
 14:02:21 12 Republican National Congressional Committee or
 14:02:24 13 through the RNSCC, the Senatorial Committee. They
 14:02:28 14 are players in this planned development as well.
 14:02:31 15 Q. Do the candidates, are the candidates ever
 14:02:39 16 directly involved with the RNC or is it always
 14:02:42 17 through the RNSC or the RNCC?
 14:02:45 18 A. They can be directly involved.
 19 Q. Is the Victory Plan covering a two-year
 20 period or four-year period?
 21 A. Two-year election cycles, so there would
 22 be a Victory Plan developed for the 2010

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1 Congressional races and competitive Senate races and
 2 competitive Congressional district races.
 14:03:11 3 Q. Does the Political Director have contact
 14:03:14 4 with donors or potential donors?
 14:03:20 5 A. No. No.
 14:03:26 6 Q. Is the Victory Plan a written document?
 14:03:37 7 Is it a document of some kind?
 14:03:39 8 A. Yes.
 14:03:41 9 Q. Who prepares it?
 14:03:43 10 A. The Political Division in consultation
 14:03:48 11 with the Political Divisions of the other two
 14:03:53 12 National Committees.
 14:03:54 13 Q. Is it, is the Victory Plan made public?
 14:03:59 14 A. No.
 14:03:59 15 Q. Does it include noncandidate activities
 14:04:21 16 such as issue advertising?
 14:04:27 17 A. Not to my -- no. The Victory Plans are
 14:04:31 18 candidate specific plans. When I say candidate
 19 specific, election-generated plans.
 20 (Following portion of deposition was
 21 confidential.) CHECK.
 22 (Whereupon, a short recess was taken from

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1 2:08 to 2:20 p.m.)
 2 BY MR. NOTI:
 14:20:47 3 Q. In case I didn't say it before, this is
 14:20:50 4 now back to nonconfidential. Does the RNC have
 14:20:58 5 divisions or departments?
 14:20:59 6 A. Yes.
 14:21:00 7 Q. Are they called divisions or departments
 14:21:02 8 or both?
 14:21:03 9 A. Divisions.
 14:21:05 10 Q. What divisions does the RNC have?
 14:21:11 11 A. It has the Administration Division. It
 14:21:15 12 has the Political Division. It has the
 14:21:19 13 Communications Division. It has the Legal Division.
 14:21:27 14 It has Member Relations Division. It has a Research
 14:21:34 15 Division. It has a Finance Division. It has a
 14:21:40 16 Strategy, Strategic, Strategy Division. It has an
 14:21:46 17 IT Division. I believe that's it.
 14:22:07 18 Q. We already talked a little bit about the
 19 Political Division. Besides what we have discussed,
 20 what does the Political Division do?
 21 A. In general terms it sets the strategy or
 22 recommends the strategy I should say for the RNC's



<p style="text-align: center;">57</p> <p>1 (Following portion of deposition was 2 confidential.) CHECK. 14:38:35 3 BY MR. NOTI: 14:38:36 4 Q. Who at the RNC would have information 14:38:39 5 about the 2009 budget? 14:38:45 6 A. The 2009 budget was approved by the RNC, 14:38:49 7 and it was approved in a public session on the floor 14:38:52 8 of that meeting. I just cannot recall the figure. 14:38:57 9 Q. When you say a public session, does that 14:39:00 10 mean people -- 14:39:01 11 A. The Chairman of the Budget Committee, Ron 14:39:04 12 Kaufman at the time, made a motion for the full RNC 14:39:07 13 to approve the budget, and it was approved. That 14:39:10 14 motion would have included in his report the budget 14:39:13 15 and, but I can't recall what that figure is. 14:39:17 16 Q. When you say a public meeting, does that 14:39:20 17 mean there were people -- 14:39:21 18 A. Press were there. It was an RNC -- it was 19 the election meeting of the new Chairman. RNC 20 meetings are always open, and press are always 21 there, and it was reported. 22 Q. And was the budget discussed at that, at</p>	<p style="text-align: center;">59</p> <p>1 Q. And who gets invited to these fund 2 raisers? 14:41:15 3 A. Depends on the event. 14:41:22 4 Q. How does it depend on the event? 14:41:28 5 A. It would depend on whether it was a major 14:41:31 6 donor event or not. 14:41:36 7 Q. So does the set of people who were invited 14:41:48 8 depend on the cost of the ticket? 14:42:05 9 A. It depends on the nature of the event. 14:42:13 10 Q. Are there ever different price tiers for a 14:42:19 11 particular event? Some people pay more to attend 14:42:23 12 than others? 14:42:24 13 A. Yes. 14:42:29 14 Q. When people pay more to attend an event 14:42:36 15 than other people are paying for the same event, is 14:42:40 16 there any benefit to paying more? 14:42:43 17 A. There may be something else attached to 14:42:45 18 the event other than the event itself. 19 Q. Such as, such as what? 20 A. A reception before a dinner. 21 Q. And who would attend that reception 22 besides the people who have paid the extra amount,</p>
<p style="text-align: center;">58</p> <p>1 that meeting, that public meeting? 2 A. Yes. 14:39:45 3 Q. Then I fail to see -- 14:39:47 4 A. Not the budget budget, but the budget 14:39:49 5 number would have been discussed. 14:39:50 6 Q. All right. Without going confidential, do 14:39:53 7 you know what the budget number was? 14:39:54 8 A. I told you I can't recall what that budget 14:39:57 9 number was. 14:39:57 10 Q. Okay. And I'm just going to mark for the 14:40:00 11 record that that previous conversation almost 14:40:02 12 certainly should not be confidential, but we'll deal 14:40:06 13 with that afterwards. 14:40:08 14 Would you please describe just in general 14:40:15 15 how the RNC raises money? 14:40:20 16 A. Through direct mail, through the web, 14:40:25 17 through major donor programs. 14:40:28 18 Q. Does the RNC host or organize fund 19 raisers, events where funds are raised? 20 A. Yes. 21 Q. Who within the RNC organizes fund raisers? 22 A. The RNC Finance Division.</p>	<p style="text-align: center;">60</p> <p>1 so to speak? 2 A. It depends on the event. 14:43:05 3 Q. Would it ever be federal office holders? 14:43:12 4 A. Yes. 14:43:14 5 Q. Would it ever be candidates for federal 14:43:19 6 office? 14:43:19 7 A. Yes. 14:43:20 8 Q. Would those candidates or office holders 14:43:28 9 attend the event itself in addition to the 14:43:32 10 reception? 14:43:35 11 A. Sometimes. 14:43:36 12 Q. How frequently does the RNC have fund 14:43:48 13 raisers where federal office holders or candidates 14:43:51 14 attend? 14:44:09 15 A. There are events that occur on an ongoing 14:44:14 16 basis. Some of them are fund-raising events in 14:44:19 17 their own right and some of them are not. They are, 14:44:22 18 they are, for example, the annual meetings or the 19 meetings of the major donor groups. They are not 20 fund raisers, per se. They are events for those 21 major donor groups. 22 Q. And do federal office holders or</p>



<p style="text-align: center;">61</p> <p>1 candidates attend the events for the donor groups? 2 A. Yes. 14:44:50 3 Q. Do they, is there usually at least one 14:44:53 4 federal office holder or candidate at those events? 14:44:58 5 A. Yes. 14:44:58 6 Q. Is there ever a major donor event where no 14:45:02 7 federal office holder or candidate attends? 14:45:05 8 A. Yes. 14:45:05 9 Q. How frequently does that happen? 14:45:10 10 A. Depends on the event. 14:45:12 11 Q. Does the RNC keep track of which 14:45:26 12 candidates or office holders attend its events? 14:45:31 13 A. Yes. 14:45:33 14 Q. How does the RNC keep track of that? 14:45:37 15 A. They invite them. 14:45:38 16 Q. Is the information kept anywhere? 14:45:48 17 A. It would be, obviously, on an invitation. 14:45:52 18 If they were, if they were attending the event as a 19 guest or features person, they would be on the 20 invitation. 21 Q. Other than through the invitation, does 22 the RNC keep track of candidates or office holders</p>	<p style="text-align: center;">63</p> <p>1 presented both substantive and recreational so that 2 individuals going to those events can go to a place, 14:47:57 3 some resort perhaps, and meet, interact with each 14:48:03 4 other and interact with the party leaders. 14:48:08 5 There are also meetings here in 14:48:09 6 Washington, D.C. usually for all donor groups 14:48:16 7 surrounding the one major fund-raising event, the 14:48:21 8 gala that the RNC would have every year usually in 14:48:25 9 the spring, but, again, from a perspective of donors 14:48:29 10 those are more like fulfillment events because they 14:48:33 11 would have already, they don't buy another ticket to 14:48:36 12 go to that event, but they are meetings surrounding 14:48:40 13 that particular event for all major donor groups. 14:48:45 14 Q. The term fulfillment event, is that the 14:48:48 15 term for the events that the major donors are 14:48:51 16 invited to, but that they are not necessarily paying 14:48:54 17 to attend that -- 14:48:55 18 A. Yes, that's how our finance folks classify 19 them, yes. 20 Q. Just let me answer the question, I mean 21 finish the question so the record is clear. 22 Fulfillment events are the events that the major</p>
<p style="text-align: center;">62</p> <p>1 attending its events? 2 A. Yes. 14:46:17 3 Q. How? 14:46:20 4 A. Probably in the materials associated with 14:46:27 5 that event as to who was at the event. 14:46:30 6 Q. Is there a list of any kind where the RNC 14:46:39 7 has information about which office holders have 14:46:45 8 attended which events? 14:46:49 9 A. Again, most office holders that attend 14:46:52 10 these events are there because they are part of a 14:46:55 11 program, and they will be identified either in the 14:46:58 12 invitation or the program as being involved in that 14:47:01 13 event. 14:47:02 14 Q. What are the different types of events 14:47:09 15 that the RNC has for its donors? 14:47:14 16 A. Again, they could be major donor fund 14:47:19 17 raising events that would actually go out and 14:47:21 18 solicit contributions for any particular donor group 19 as an incentive to go to the event. But there are 20 also many events, probably two or three a year for 21 each major donor group that are not fund raisers, 22 but meetings in various locations where a program is</p>	<p style="text-align: center;">64</p> <p>1 donors get to go to by virtue of having paid their 2 donation already; is that right? 14:49:19 3 A. Yes, but it also is an incentive for 14:49:23 4 perhaps new donors to participate as well. 14:49:36 5 Q. Approximately -- I'm sorry to ask for a 14:49:39 6 percentage again, but approximately what percent or 14:49:42 7 proportion of the RNC's funds are raised through the 14:49:51 8 events that you just mentioned? 14:49:53 9 A. I believe that the majority of the money 14:50:05 10 that is raised by the RNC Finance Division is low 14:50:08 11 dollar, and I believe that is around 70 percent, 14:50:17 12 and, therefore, the other percentage would be some 14:50:23 13 of the other major donor groups. 14:50:24 14 Q. So 70 percent is the low dollar amount? 14:50:27 15 A. I believe so, yes. 14:50:28 16 Q. Some of the major donor events involve 14:50:48 17 seated meals or other seated activities; is that 14:50:51 18 correct? 19 A. Yes. 20 Q. Is the seating ever assigned? Are people 21 ever assigned to a particular table or a particular 22 seat?</p>



<p>73</p> <p>1 leaving. That's the interaction we're talking 2 about.</p> <p>15:04:57 3 Q. Is there ever an opportunity for the 15:04:59 4 donors to interact more substantively with the 15:05:03 5 candidates or office holders?</p> <p>15:05:03 6 A. On a one-on-one basis, no.</p> <p>15:05:06 7 Q. Not necessarily one on one, but within the 15:05:09 8 reception or the event.</p> <p>15:05:10 9 A. No. Not from the RNC perspective, no.</p> <p>15:05:16 10 Q. I'm sorry. What do you mean by --</p> <p>15:05:21 11 A. I can only speak for the RNC, and my 15:05:24 12 understanding is that has not occurred, no. There 15:05:26 13 is no interaction other than the exchange of 15:05:29 14 pleasantries at a reception, making some remarks and 15:05:32 15 then leaving.</p> <p>15:05:33 16 Q. So the office holder or candidate never 15:05:39 17 mingles with the crowd, has a few drinks, that kind 15:05:42 18 of thing?</p> <p>19 A. No.</p> <p>20 Q. Well, why not?</p> <p>21 A. Usually they are under a time frame. They 22 are there for a program, and so the program is</p>	<p>75</p> <p>1 to assist the Republican National Committee, and 2 this is one of the, of the benefits that is given to 15:07:04 3 attend an event where they more interact with each 15:07:07 4 other as members of this club, and as part of that 15:07:11 5 they get policy briefings. They get an opportunity 15:07:14 6 to hear from party leaders, whether they be members 15:07:18 7 of Congress, Senators, Presidents, Vice Presidents, 15:07:21 8 Governors, celebrity, Republican celebrities.</p> <p>15:07:27 9 That's just -- they are satisfied with that as being 15:07:30 10 the rationale for going. It's more an effort by the 15:07:33 11 group itself to continue their own communications 15:07:38 12 with each other as much as, you know, seeing or 15:07:42 13 hearing from party leaders.</p> <p>15:07:44 14 Q. Well, then why is, why in presenting the 15:07:50 15 benefits of donor levels why does the RNC promote 15:07:55 16 the opportunity to meet and interact, to use the 15:08:00 17 term loosely, with federal officers and candidates 15:08:05 18 and office holders?</p> <p>19 A. Because the individuals want to hear what 20 their leaders have to say.</p> <p>21 Q. But they don't want to say anything back?</p> <p>22 A. Well, they have an opportunity to ask</p>
<p>74</p> <p>1 probably later in the day. They make some remarks, 2 and they leave. If they are part of that reception 15:05:57 3 program, they make some remarks and leave. It is 15:06:00 4 not something that, that is sort of where the 15:06:05 5 members just sit around and participate on an 15:06:09 6 ongoing basis with the RNC people that are there for 15:06:12 7 a two or three-day event. They are there, they make 15:06:15 8 their presentation, and they leave.</p> <p>15:06:16 9 Q. Do the donors ever complain? Do the 15:06:19 10 donors ever say, hey, I gave \$28,000 to come to this 15:06:23 11 event, and all I got to do was watch some --</p> <p>15:06:26 12 A. No.</p> <p>15:06:26 13 Q. -- House member speak?</p> <p>15:06:28 14 A. No. No.</p> <p>15:06:30 15 Q. They don't? Do the donors ever try to 15:06:35 16 have more substantive engagement with the candidates 15:06:40 17 or office holders who are there?</p> <p>15:06:42 18 A. If they try, they are not allowed. To my 19 knowledge, it does not happen. There is a premise 20 that you have that the people are giving this 21 \$30,000 because they want to somehow engage with the 22 member. The reason they gave is because they want</p>	<p>76</p> <p>1 questions, but this is not done to allow for 2 individuals to either have particular access or ask 15:08:23 3 particular questions. This is as a group to hear 15:08:27 4 what the individual has to say on a position, 15:08:31 5 perhaps challenge the individual on that point of 15:08:33 6 view, perhaps agree with that individual, get 15:08:36 7 clarification on legislation, whatever it may be.</p> <p>15:08:43 8 But that, and I've been at many of these events 15:08:47 9 personally, and I have seen that, and that is 15:08:50 10 basically the nature of these events. Whether it's 15:08:52 11 the President, the Vice President, Senator, 15:08:56 12 Congressman, that is the purpose behind this. It's 15:08:59 13 nothing more than that.</p> <p>15:09:00 14 Q. So the donor might express to the federal 15:09:03 15 office holder an opinion about legislation or some 15:09:08 16 other issue?</p> <p>15:09:10 17 A. You know, they may say, well, you know, 15:09:14 18 what is going on with regard to the stimulus plan? 19 Why, why is this now law? What are you going to do 20 about this? How are you reacting to this? And 21 99 percent of the time there's a philosophical thing 22 to begin with, and it gives the office holder an</p>



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1 opportunity to say what the Republicans in Congress
 2 are doing on a particular point of view, how they
 15:09:34 3 are handling it or whether they totally disagree
 15:09:37 4 with the questioner.
 15:09:37 5 Q. And the office holder who's there knows
 15:09:41 6 because of the nature of the event that whoever is
 15:09:44 7 asking the question is a major donor; correct?
 15:09:47 8 A. Well, it is a major donor event. They are
 15:09:49 9 going to know that the person -- but you may have
 15:09:52 10 three people in the room with three different points
 15:09:55 11 of view on the same position.
 15:09:57 12 Q. Do candidates or office holders ever
 15:10:06 13 attend these events, but not give a speech?
 15:10:28 14 A. Generally speaking, no. I can't say,
 15:10:31 15 however, that if, for example, there was an event in
 15:10:38 16 a particular area and if a Congressman or Senator
 15:10:43 17 might stop by, but it's not the norm. Usually these
 15:10:46 18 things are pretty well planned out, and they are
 19 pretty well sort of set out ahead of time, and it's
 20 pretty fine tuned agenda that needs to be followed
 21 and so that, unless you're knowledgeable -- in other
 22 words, we don't promote this to outsiders. We're

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1 certainly not going to refuse anyone that shows up,
 2 but, as the general rule, I don't believe it, no.
 15:11:13 3 The answer is no.
 15:11:14 4 Q. I think you mentioned that the Chair of
 15:11:24 5 the RNC sometimes solicits donations over the phone;
 15:11:32 6 is that right?
 15:11:33 7 A. Yes.
 15:11:33 8 Q. How does the Chair decide whom to call to
 15:11:39 9 solicit?
 15:11:40 10 A. The Finance Division comes up with a list
 15:11:43 11 of potential donors and presents them. There's some
 15:11:50 12 time put on the Chairman's schedule to make phone
 15:11:53 13 calls to potential prospects and ask them to donate
 15:11:58 14 to the RNC.
 15:11:59 15 Q. And how does the Finance Division generate
 15:12:02 16 the list that it gives to the Chair?
 15:12:04 17 A. Based on its own research and also
 15:12:12 18 generated from the Finance Chair and other major
 19 donors from that particular program that may have
 20 potential prospects for the RNC Chairman to
 21 communicate with.
 22 Q. Is it exclusively people who have given

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1 before to the RNC?
 2 A. No.
 15:12:36 3 Q. Is it exclusively people who've given to
 15:12:39 4 Republican organizations in general previously?
 15:12:41 5 A. No.
 15:12:41 6 Q. How would somebody who hasn't given to a
 15:12:45 7 Republican candidate organization make it on the
 15:12:48 8 list for the Chairman to call?
 15:12:50 9 A. That's what the Finance Division's
 15:12:56 10 responsibility is for major donor programs, to look
 15:12:58 11 how to expand their program, and they are always
 15:13:00 12 looking out in a particular area and determine
 15:13:06 13 whether or not there's some potential prospects
 15:13:09 14 based on, you know, suggestions from other donors,
 15:13:12 15 based on suggestions perhaps from RNC members from a
 15:13:20 16 particular state, based on just reading the
 15:13:23 17 newspaper and seeing someone had said something that
 15:13:28 18 may encourage the possibility that they would be
 19 amenable to be part of the Republican major donor
 20 team.
 21 Q. Do federal candidates or office holders
 22 ever make fund-raising telephone calls on behalf of

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1 the RNC?
 2 A. I can't say never, but it is not part of
 15:13:56 3 the normal day-to-day operations of the RNC for
 15:14:01 4 federal office holders to make phone calls on behalf
 15:14:04 5 of the RNC.
 15:14:04 6 Q. When was the last time it happened?
 15:14:27 7 A. I don't know.
 15:14:28 8 Q. Are you aware of it happening at all since
 15:14:35 9 2003?
 15:14:37 10 A. No.
 15:14:37 11 Q. What other -- who besides the Chair and
 15:14:59 12 the head of the Finance Committee would make
 15:15:06 13 fund-raising calls to major donors or potential
 15:15:11 14 major donors?
 15:15:15 15 A. It could very well be the director of that
 15:15:23 16 particular program, particularly if there was some
 15:15:29 17 sort of relationship there that the, for example,
 15:15:33 18 the head of the Regent program would make a direct
 19 call to an individual, at least initially, to get a
 20 determination whether there would be any interest in
 21 donating.
 22 Q. Did President Bush ever make fund-raising



<p style="text-align: center;">81</p> <p>1 calls –</p> <p>2 A. No.</p> <p>15:15:49 3 Q. – for the RNC?</p> <p>15:15:51 4 A. No.</p> <p>15:15:51 5 Q. Does the RNC ever solicit major donations</p> <p>15:16:00 6 through the mail?</p> <p>15:16:01 7 A. The RNC has received major donations</p> <p>15:16:05 8 through the mail, but again the mail is for the most</p> <p>15:16:10 9 part low dollar mail. There are two major donor</p> <p>15:16:15 10 groups. The President's Club and the Chairman's</p> <p>15:16:21 11 Advisory Board, which in most other circles would be</p> <p>15:16:24 12 viewed as low dollar. The chairman's, the</p> <p>15:16:26 13 President's Club is \$1,000 level. The Chairman's</p> <p>15:16:32 14 Advisory Board is a \$5,000 level. There are mail</p> <p>15:16:36 15 solicitations and prospects that go out in that</p> <p>15:16:40 16 area, and that is probably more generated by the</p> <p>15:16:42 17 mail than – the other major donor programs are not.</p> <p>15:16:50 18 Q. If the RNC sends out a, what's intended to</p> <p>19 be a low dollar mailing and somebody sends back</p> <p>20 \$5,000, that donor would then go into the major</p> <p>21 donor program; correct?</p> <p>22 A. Not necessarily. That individual would be</p>	<p style="text-align: center;">83</p> <p>1 Q. Well, for example, the RNC solicits</p> <p>2 donations on its own website; correct?</p> <p>15:18:19 3 A. Yes.</p> <p>15:18:19 4 Q. Does the RNC advertise on other websites</p> <p>15:18:25 5 for donations?</p> <p>15:18:26 6 A. Yes.</p> <p>15:18:27 7 Q. Who is responsible for generating that</p> <p>15:18:38 8 advertising?</p> <p>15:18:39 9 A. It would be a combination of the Finance</p> <p>15:18:42 10 Division and part of our RT, the people who control</p> <p>15:18:46 11 e-mails and web, the web operation in formulating</p> <p>15:18:51 12 the package together and contacting the appropriate</p> <p>15:18:55 13 website vendor and purchasing, purchasing the time,</p> <p>15:19:01 14 but it, the time would be purchased through the web</p> <p>15:19:05 15 operation, and the finance folks would be</p> <p>15:19:08 16 responsible for coming up with the solicitation that</p> <p>15:19:11 17 would actually be submitted for, to the web vendor.</p> <p>15:19:16 18 Q. Do you know what approximately percentage</p> <p>19 of the RNC's fund raising occurs through that</p> <p>20 method?</p> <p>21 A. Very little. Very little. I believe</p> <p>22 that, even though we constantly try to increase the,</p>
<p style="text-align: center;">82</p> <p>1 invited to go into the major donor program, but just</p> <p>2 because you had a large contribution coming in</p> <p>15:17:14 3 through the low dollar mail program does not</p> <p>15:17:17 4 automatically put you in a category. It could be</p> <p>15:17:21 5 much larger than that. It doesn't make you that</p> <p>15:17:25 6 unless you so choose to be part of that club. It's</p> <p>15:17:29 7 not an automatic thing.</p> <p>15:17:30 8 Q. So, when the larger donation comes in, the</p> <p>15:17:34 9 RNC contacts the donor and asks you qualified for</p> <p>15:17:36 10 for this level, would you like to join, that kind of</p> <p>15:17:39 11 thing?</p> <p>15:17:39 12 A. That's correct.</p> <p>15:17:40 13 Q. What about e-mail? Does the RNC use</p> <p>15:17:43 14 e-mail to solicit major donations?</p> <p>15:17:46 15 A. No.</p> <p>15:17:51 16 Q. So when you referred earlier to the</p> <p>15:17:53 17 roughly 70 percent that comes in through phone and</p> <p>15:17:57 18 mail --</p> <p>19 A. And e-mail, but it's low dollar.</p> <p>20 Q. Other than e-mail, does RNC solicit funds</p> <p>21 through the Internet?</p> <p>22 A. I don't understand your question.</p>	<p style="text-align: center;">84</p> <p>1 the solicitations by e-mail, which is very cost</p> <p>2 effective, we have not been as successful as the</p> <p>15:19:38 3 opposition party in generating interest by our donor</p> <p>15:19:43 4 base to contribute that way. They are still very</p> <p>15:19:47 5 much a direct mail, direct contact situation.</p> <p>15:19:57 6 Q. Other than the methods we've discussed</p> <p>15:20:01 7 which I believe are fund raisers, telephone, mail,</p> <p>15:20:05 8 e-mail and Internet, does the RNC have any other</p> <p>15:20:09 9 fund-raising methods?</p> <p>15:20:15 10 A. Can you expand on that a little bit?</p> <p>15:20:17 11 Q. Does the RNC solicit donations in any</p> <p>15:20:22 12 format other than the ones that we've discussed?</p> <p>15:20:27 13 A. Can you repeat the ones you've mentioned?</p> <p>15:20:29 14 Q. Sure. I believe they are fund raisers,</p> <p>15:20:31 15 telephone, mail, e-mail and the Internet.</p> <p>15:20:39 16 A. No.</p> <p>15:20:47 17 Q. Other than fund raising, does the RNC have</p> <p>15:20:51 18 any other sources of income?</p> <p>19 A. Yes.</p> <p>20 Q. What sources?</p> <p>21 A. There are transfers that come in from</p> <p>22 other party organizations. There are transfers that</p>



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<p>1 A. Infrequently.</p> <p>2 Q. What do you mean by infrequently?</p> <p>15:48:33 3 A. It's not a common occurrence.</p> <p>15:48:35 4 Q. How many times has it happened in the last</p> <p>15:48:38 5 five years?</p> <p>15:48:39 6 A. I'm not aware of any. Most of the efforts</p> <p>15:48:57 7 would have been joint fund-raising efforts, and I'm</p> <p>15:49:00 8 not aware of, I'm not aware of any list exchanges</p> <p>15:49:06 9 other than through the joint fund raising operation.</p> <p>15:49:10 10 Q. So, when there's a joint fund raising</p> <p>15:49:16 11 operation between the RNC and the state party, do</p> <p>15:49:19 12 they exchange donor lists?</p> <p>15:49:21 13 A. Up to a level of equal, yes.</p> <p>15:49:25 14 Q. Up to a level of equal?</p> <p>15:49:27 15 A. You know, name for name type thing. The</p> <p>15:49:30 16 RNC list would be broken down for that particular</p> <p>15:49:33 17 state, and, depending on how many names that the</p> <p>15:49:37 18 state had, it would be done equivalently. It</p> <p>19 wouldn't just be every name we have in that state,</p> <p>20 unless they could provide an equivalent number of</p> <p>21 names, and then it was purged to take out the</p> <p>22 duplicates.</p>	<p>1 A. The only division would be the Finance</p> <p>2 Division.</p> <p>15:52:05 3 Q. Does the Finance Division report on</p> <p>15:52:09 4 individual donations that it's received?</p> <p>15:52:11 5 A. To the Chairman?</p> <p>15:52:12 6 Q. To the Chairman or to anybody else.</p> <p>15:52:15 7 A. To the Chairman, yes.</p> <p>15:52:16 8 Q. And what information does the Finance</p> <p>15:52:20 9 Division give the Chairman about individual</p> <p>15:52:21 10 donations?</p> <p>15:52:22 11 A. The Finance Division would provide a</p> <p>15:52:28 12 weekly, if not daily, breakdown of each, of its</p> <p>15:52:32 13 fund-raising operations and would include in that</p> <p>15:52:36 14 the low dollar amounts and the major donor groups</p> <p>15:52:40 15 and who may have contributed within that group.</p> <p>15:52:44 16 Q. Does the Chairman circulate that</p> <p>15:52:49 17 information?</p> <p>15:52:49 18 A. No.</p> <p>19 Q. Does the Chairman send it outside the RNC?</p> <p>20 A. No, no, not that I'm aware of.</p> <p>21 Q. Does the Finance Division send that</p> <p>22 information to anybody besides the Chairman?</p>
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<p>1 Q. And that's for legal reasons?</p> <p>2 A. Yes, and to make sure, although we could</p> <p>15:49:53 3 make unlimited transfers at the state level, the</p> <p>15:49:57 4 names of donors at all levels is highly confidential</p> <p>15:50:03 5 and it is a very, it is a – everyone protects their</p> <p>15:50:13 6 own donor base, highly competitive as to who gives</p> <p>15:50:18 7 to whom.</p> <p>15:50:19 8 Q. And how many times in the last five years</p> <p>15:50:26 9 has the RNC exchanged donor lists with a candidate?</p> <p>15:50:56 10 A. I'm only aware of one.</p> <p>15:50:58 11 Q. Who is the candidate?</p> <p>15:51:00 12 A. I believe it was Presidential candidate.</p> <p>15:51:03 13 Q. Which one?</p> <p>15:51:04 14 A. Senator McCain, I believe.</p> <p>15:51:25 15 Q. Does the RNC's Finance Division or any</p> <p>15:51:32 16 other division within the RNC ever report to the</p> <p>15:51:35 17 Chair or to the RNC about individual donations that</p> <p>15:51:39 18 have come in?</p> <p>19 A. Could you repeat the question?</p> <p>20 Q. Sure. Does any division within the RNC</p> <p>21 report up the chain information about individual</p> <p>22 donations that have come in?</p>	<p>1 A. The only other person I can think of would</p> <p>2 be the Chairman of the Finance Committee.</p> <p>15:53:15 3 Q. Does the Chairman of the Finance Committee</p> <p>15:53:23 4 then pass the information on to anybody?</p> <p>15:53:24 5 A. Not that I'm aware of.</p> <p>15:53:33 6 Q. What donor information does the RNC share</p> <p>15:53:38 7 with the NRCC or the NRSC?</p> <p>15:53:46 8 A. None, other than what the committees can</p> <p>15:53:49 9 glean from the FEC reports based on the public</p> <p>15:53:52 10 record.</p> <p>15:53:52 11 Q. So each of the national committees looks</p> <p>15:54:01 12 at the other's public reports, but there's no</p> <p>15:54:03 13 internal exchange of donor information?</p> <p>15:54:05 14 A. Correct.</p> <p>15:54:24 15 MR. NOTI: Would you please mark this as</p> <p>15:54:29 16 Exhibit C?</p> <p>15:54:31 17 (Deposition Exhibit No. C, 2009 RNC Major</p> <p>18 Donor Groups, was marked for identification and</p> <p>19 retained by counsel and retained by counsel.)</p> <p>20 BY MR. NOTI:</p> <p>21 Q. Are you familiar with this document?</p> <p>22 A. Yes, I am.</p>



<p style="text-align: center;">101</p> <p>1 Q. What is it?</p> <p>2 A. It is a document that reflects the 2009</p> <p>15:55:07 3 Republican National Committee major donor groups,</p> <p>15:55:10 4 and it represents the Regents, the Team 100, the</p> <p>15:55:13 5 Eagles, the Majority Fund and Young Eagles.</p> <p>15:55:19 6 Q. Are there other major donor groups that</p> <p>15:55:23 7 are not listed here?</p> <p>15:55:25 8 A. Yes. The President's Club and the</p> <p>15:55:28 9 Chairman's Advisory Board.</p> <p>15:55:29 10 Q. As a general matter, why does the RNC have</p> <p>15:55:44 11 these donor levels or have donor levels at all?</p> <p>15:55:53 12 A. To generate contributions from individuals</p> <p>15:55:56 13 at certain categories who are fortunate enough to be</p> <p>15:55:59 14 able to contribute the maximum amount federally</p> <p>15:56:02 15 allowed to be given to the RNC.</p> <p>15:56:06 16 Q. Does having donor groups help the RNC</p> <p>15:56:13 17 raise money?</p> <p>15:56:15 18 A. That's certainly the perspective of the</p> <p>19 RNC because it continues to have these groups and</p> <p>20 continues to raise money.</p> <p>21 Q. Has the RNC ever quantified or attempted</p> <p>22 to quantify the effect of that, having these groups</p>	<p style="text-align: center;">103</p> <p>1 as the maximum level group, and from there it works</p> <p>2 downward. Obviously, these are determined to be the</p> <p>15:58:32 3 most that, you know, the RNC can legally get on a</p> <p>15:58:36 4 yearly basis from, from individuals and, as a</p> <p>15:58:40 5 result, set the standard based on what's legally</p> <p>15:58:42 6 allowed.</p> <p>15:58:42 7 Q. Well, if I read the document correctly,</p> <p>15:58:49 8 there are alternate ways to reach the membership</p> <p>15:58:52 9 levels without making donations, right, so for the</p> <p>15:58:57 10 Regents one could either give basically two \$30,000</p> <p>15:59:03 11 donations or raise 200,000. Who decides on that</p> <p>15:59:09 12 \$200,000 level or its equivalent for the other</p> <p>15:59:13 13 groups?</p> <p>15:59:16 14 A. Generally speaking, these programs are not</p> <p>15:59:20 15 unlike other organizations, sort of fund-raising</p> <p>15:59:23 16 organizations. These individuals that are members</p> <p>15:59:27 17 of these groups are not fund raisers. They are</p> <p>15:59:30 18 donors. There may be occasionally someone that does</p> <p>19 not have the resources, but can raise it, but that</p> <p>20 is an exception to the rule. A fund-raising program</p> <p>21 is not the optimum program. Most of the individuals</p> <p>22 who give are not fund raisers. That is an option</p>
<p style="text-align: center;">102</p> <p>1 has on fund raising?</p> <p>2 A. Again, it generates at least, you know, a</p> <p>15:56:40 3 certain percentage of income that would otherwise</p> <p>15:56:43 4 not be available through low dollar giving.</p> <p>15:56:51 5 Q. So has the RNC ever tried to figure out</p> <p>15:56:59 6 how much more money it takes in as a result of</p> <p>15:57:01 7 having these donor groups?</p> <p>15:57:05 8 A. The decision has been made that without</p> <p>15:57:09 9 having some effort for individuals of like-minded</p> <p>15:57:14 10 persuasion to be able to interact primarily with</p> <p>15:57:18 11 each other, and a lot of these groups form their own</p> <p>15:57:22 12 close, personal relationships with their club</p> <p>15:57:25 13 members, and giving them an opportunity to be part</p> <p>15:57:29 14 of the RNC operation, they have decided that this</p> <p>15:57:34 15 was and continues to be a way to generate interest</p> <p>15:57:39 16 in the party by individuals who have the fortunate</p> <p>15:57:43 17 ability to be able to donate in large amounts. I</p> <p>15:57:51 18 don't think that I can say more than that.</p> <p>19 Q. Who sets the levels?</p> <p>20 A. The individual major donor programs have</p> <p>21 not varied for many, many years. The levels are set</p> <p>22 based on what is legally allowed to be contributed</p>	<p style="text-align: center;">104</p> <p>1 that was put in there. Typically, it is the member</p> <p>2 him or herself that donates the maximum plus the</p> <p>15:59:58 3 spouse or in that case another person they bring</p> <p>16:00:02 4 into the fold, but it is not -- these folks are not</p> <p>16:00:07 5 solicitors.</p> <p>16:00:08 6 Q. And I understand that. I'm just asking</p> <p>16:00:11 7 somebody had to decide --</p> <p>16:00:12 8 A. The Finance Division in conjunction with</p> <p>16:00:14 9 the Chairman would decide the parameters of what</p> <p>16:00:20 10 these limits would be and how they would be</p> <p>16:00:21 11 implemented.</p> <p>16:00:22 12 Q. And who decides on what benefits each</p> <p>16:00:26 13 level gets?</p> <p>16:00:28 14 A. Again, it will be the Finance Division in</p> <p>16:00:31 15 cooperation in making recommendations to the</p> <p>16:00:33 16 Chairman and the Finance Chairman to come up with a</p> <p>16:00:36 17 major donor program.</p> <p>16:00:37 18 Q. When the Finance Division and the Chairman</p> <p>19 and the Finance Committee Chairman are deciding on</p> <p>20 the benefits to offer, what factors do they consider</p> <p>21 in deciding on those benefits?</p> <p>22 A. Well, the maximum obvious contribution is</p>



<p style="text-align: center;">125</p> <p>1 looking at which we didn't receive either through 2 discovery, and, to my knowledge, we have not 16:30:43 3 received anything from any RNC website. I was 16:30:48 4 looking through today's production just now, and I 16:30:51 5 still don't see anything. I believe that this 16:30:55 6 document that we've been looking at is clearly 16:30:57 7 responsive and should have been produced, and my 16:30:59 8 guess is on these password protected ones there are 16:31:03 9 equally responsive documents. 16:31:04 10 MR. BOPP: If you have any additional 16:31:06 11 requests based upon the deposition, if you give it 16:31:09 12 to us in writing, we'll be happy to respond as 16:31:13 13 promptly as we can. 16:31:14 14 MR. NOTI: And we will do that, but this 16:31:16 15 is not an additional request. It's one of the 16:31:18 16 original requests. 16:31:20 17 MR. BOPP: Well, whichever. If you think 16:31:23 18 our production is deficient in some way, then you 19 advise us, and we'll promptly respond. 20 BY MR. NOTI: 21 Q. You can put that document aside. And I'd 22 like to ask the court reporter to mark this as</p>	<p style="text-align: center;">127</p> <p>1 tour or White House tour, no. 2 Q. Do donors ever ask the RNC to help set up 16:47:27 3 meetings or other interaction with federal 16:47:29 4 candidates or office holders? 16:47:31 5 A. They may ask, but the RNC does not do 16:47:34 6 that. 16:47:38 7 Q. So, when a donor asks to be put in contact 16:47:42 8 say with – I shouldn't say put in contact. When a 16:47:46 9 donor asks for the RNC to help the donor meet with a 16:47:53 10 federal office holder, what does the RNC say? 16:47:56 11 A. We can't accommodate you, but we give them 16:47:59 12 a phone number and a contact person that, the person 16:48:04 13 they would need to contact to schedule that on their 16:48:08 14 own. 16:48:08 15 Q. Does the RNC's response depend on the size 16:48:13 16 of the donor? 16:48:14 17 A. No. 16:48:14 18 Q. Why is that? Why does the RNC respond in 19 that way to such requests? 20 A. To avoid any perception that somehow being 21 a major donor was going to get you an access for a 22 one-on-one meeting, and the RNC policy is not to,</p>
<p style="text-align: center;">126</p> <p>1 Exhibit E. And I'll say that it's document Bates 2 stamped RNC 47. It is labeled Confidential, Counsel 16:31:56 3 Only, and so, pursuant to our Protective Order, 16:31:59 4 beginning now the transcript of this portion of the 16:32:04 5 deposition will also be considered Highly 16:32:07 6 Confidential. 7 (Following portion of deposition was 16:45:55 8 confidential.) 16:45:55 9 BY MR. NOTI: 16:45:56 10 Q. Does the RNC have any donor groups other 16:45:59 11 than the ones we've discussed? 16:46:06 12 A. No. 16:46:06 13 Q. Other than the benefits we've discussed 16:46:16 14 through the donor programs, what other benefits does 16:46:19 15 the RNC provide to its donors? 16:46:28 16 A. Other than the events themselves and 16:46:44 17 sometimes what is commonly referred to as chum like 16:46:48 18 going to an event and getting a belt buckle or 19 something like that, to my knowledge, nothing else. 20 Q. What about individualized benefits? Does 21 the RNC ever provide benefits to a specific donor? 22 A. Other than trying to get them a Capitol</p>	<p style="text-align: center;">128</p> <p>1 not to promote that perspective. 2 Q. Is that a written policy? 16:48:41 3 A. It is a Finance Division policy. I don't 16:48:49 4 believe it's set in writing, but that is the policy 16:48:51 5 of the RNC. 16:48:55 6 Q. If it's not written, how are members of 16:49:01 7 the Finance Division informed of the policy? 16:49:03 8 A. Through their own director and in setting 16:49:11 9 up their own processes as to how they are to deal 16:49:13 10 with major donors and what they can and cannot do. 16:49:17 11 Q. Would that change if the RNC won this 16:49:21 12 lawsuit and was allowed to take unlimited 16:49:25 13 contributions? Would the policy about giving access 16:49:32 14 to federal office holders change at all? 16:49:35 15 A. No. 16:49:36 16 Q. Why not? 16:49:39 17 A. It is the policy not to provide any of our 16:49:43 18 donors any sort of access to members of Congress on 19 a one-on-one basis, and that's not going to change. 20 It's not – it's under federal law. It's not going 21 to change if it were not under federal law, the 22 limits.</p>



<p style="text-align: center;">129</p> <p>1 Q. Oh, I see what you're saying. Well, but 2 right now the maximum donor is basically \$30,000 16:50:04 3 donor. If you won this lawsuit and you could take a 16:50:08 4 million dollar check, why wouldn't you help the 16:50:14 5 person who just gave a million dollars to the party 16:50:16 6 get just a meeting with a member of Congress? 16:50:21 7 A. The guiding principle that we follow is 16:50:23 8 that there is no providing of access to a member on 16:50:29 9 a one-on-one basis. 16:50:30 10 Q. Well, prior to BCRA the RNC did provide 16:50:38 11 access to major donors; is that correct? 16:50:41 12 A. Some would argue that was the policy. I 16:50:45 13 would argue even before BCRA the general rule was, 16:50:49 14 no, not to do that, but even after, but particularly 16:50:53 15 after BCRA the sensitivity of the issue is such that 16:50:57 16 the policy was implemented to make sure that, you 16:51:00 17 know, even occasionally that would not be the case. 16:51:03 18 Q. So did the policy that exists now exist 19 before BCRA? 20 A. It is my understanding that the policy 21 existed. 22 Q. But some donors -- excuse me -- still got</p>	<p style="text-align: center;">131</p> <p>1 that were being provided, and based on that it would 2 either be, it would either meet that standard or 16:52:53 3 not, and, if it met the standard, the bill would be 16:52:55 4 paid, and then, obviously, the appropriate record 16:52:59 5 keeping would be initiated to be able to report that 16:53:03 6 transaction. 16:53:04 7 Q. And what about transfers to other 16:53:10 8 Republican committees? What information would get 16:53:14 9 recorded without those? 16:53:16 10 A. A transfer to another committee or any 16:53:20 11 political contribution would be routed through an 16:53:25 12 approval process starting more than likely from the 16:53:29 13 Political Division with the director signing off on 16:53:32 14 that, then going to the Legal Division to make sure 16:53:35 15 that it was legally acceptable, and then it would go 16:53:38 16 to the Admin Division to be able to record, and then 16:53:42 17 it would be signed off by the Chairman to determine 16:53:47 18 that that would be an appropriate expenditure or 19 disbursement I should say. 20 Q. And all of that information is recorded -- 21 does the RNC somewhere record all those steps? 22 A. It is a process where there is a document</p>
<p style="text-align: center;">130</p> <p>1 access to federal office holders even with that 2 policy in place; right? 16:51:26 3 A. Not to my knowledge. 16:51:41 4 Q. Let's switch gears and talk about 16:51:43 5 spending. When the RNC makes a disbursement, what 16:51:52 6 information gets recorded about the disbursement? 16:51:57 7 A. It would depend on the disbursement. 16:52:02 8 Q. Other than what's required by law, what 16:52:05 9 information gets recorded? 16:52:06 10 A. Again, it would depend on the 16:52:08 11 disbursement. 16:52:09 12 Q. What would it depend on? 16:52:11 13 A. Is it a payment to a vendor? Is it a 16:52:15 14 transfer to a state party? Is it a contribution to 16:52:18 15 a candidate? Is it an independent expenditure? 16:52:23 16 Q. So what would, other than what's required 16:52:25 17 by law, what would get recorded for payments to 16:52:31 18 vendors? 19 A. First of all, there would be no payment to 20 a vendor without a contract, and then, secondly, 21 there would be no payment to a vendor without an 22 invoice. Both of those would describe the services</p>	<p style="text-align: center;">132</p> <p>1 that is circulated, and individuals required to sign 2 off on it sign off on it before it will be processed 16:54:09 3 through the Admin Division. 16:54:10 4 Q. Who at the RNC -- strike that. Who's 16:54:22 5 responsible for insuring that each disbursement is 16:54:27 6 legal? 16:54:30 7 A. The counsel's office at the RNC. 16:54:33 8 Q. How do they go about checking the 16:54:41 9 disbursements? 16:54:43 10 A. Generally, when the disbursement is being 16:54:45 11 made there is an invoice and a contract attached to 16:54:48 12 that, and the approval process is done so that the 16:54:52 13 appropriate division is signing off on it if, 16:54:56 14 depending on what the disbursement is for, and then 16:55:02 15 it is then routed through the admin folks that 16:55:05 16 double check it to make sure that, if it is a 16:55:07 17 contribution, that it's well within, you know -- we 16:55:11 18 have not made any or, if it's a coordinated 19 expenditure, that it's within the limits allowed, 20 and then once that's processed it goes to the 21 Chairman for final signoff. 22 Q. Does the RNC ever circulate information</p>



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1 past. It had provided direct support to a
 2 gubernatorial candidate. It had provided generic
 17:24:18 3 Get Out the Vote efforts on behalf of the Republican
 17:24:21 4 ticket and treated that as in kind donations to all
 17:24:25 5 of the recipients. It had requested and received
 17:24:28 6 permission to do independent expenditures based on
 17:24:31 7 New Jersey law and, again, subject to the
 17:24:36 8 restrictions of New Jersey using the same kind of
 17:24:40 9 resources that it could do pre BCRA.
 17:24:43 10 Q. The RNC could do all of those activities
 17:24:51 11 with hard money; correct?
 17:24:53 12 A. Correct.
 17:24:56 13 Q. So, other than deciding to spend hard
 17:25:01 14 money on other things, what's stopping the RNC from
 17:25:06 15 doing each and every one of those activities in 2009
 17:25:10 16 in New Jersey?
 17:25:10 17 A. The budget.
 17:25:12 18 Q. Choosing to spend hard money on other, on
 19 other expenditures?
 20 A. Well, choosing to spend hard money on what
 21 it was raised to do, namely, federal candidates.
 22 The responsibility of insuring that sufficient

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1 monies are kept in the budget to be able to fund
 2 races that are occurring in 2010.
 17:25:30 3 Q. But, if the considerations for which
 17:25:33 4 candidates to support are the same for federal and
 17:25:36 5 state candidates and the RNC is a national party,
 17:25:41 6 not a federal party, why is the RNC's hard money
 17:25:45 7 spending automatically given to the federal
 17:25:47 8 candidates? Why not spend it on New Jersey in 2009?
 17:25:52 9 A. It could, but then it would be
 17:25:54 10 irresponsible because it would have no resources
 17:25:56 11 available for any special election that would occur
 17:25:58 12 like are occurring now in various Congressional
 17:26:01 13 races, potential situation in providing resources in
 17:26:10 14 Minnesota recount or contest situation, providing
 17:26:13 15 resources if, heaven forbid, there is another
 17:26:16 16 election there at the end of the day or an election
 17:26:20 17 for Senator in the state of Illinois. There is a
 17:26:24 18 need to preserve that. There's a need to preserve
 19 money to just do general overhead expenditures.
 20 There's a need to spend money on fund
 21 raising in order to raise the money you need to
 22 spend the money, and direct mail is a very expensive

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1 proposition. So it is a, it is a balancing act,
 2 and, if you look at what was spent in those races
 17:26:49 3 post BCRA compared to what was spent in those races
 17:26:53 4 pre BCRA, it's a drop in the bucket.
 17:26:56 5 Q. So the RNC would prefer to spend its hard
 17:26:59 6 money on all the other things you just mentioned
 17:27:02 7 rather than on the New Jersey 2009 elections, state
 17:27:06 8 elections?
 17:27:07 9 A. Well, the RNC would like to spend as
 17:27:11 10 legally allowed to be spent under New Jersey law
 17:27:15 11 based on being able to raise it under New Jersey law
 17:27:18 12 and not have to worry about using contributions that
 17:27:22 13 are by their very nature limited in how much can be
 17:27:25 14 raised and the aggregate limits for the cycle or for
 17:27:29 15 the year I should say that would deplete its normal
 17:27:34 16 sources of income.
 17:27:35 17 Q. How are the activities that the RNC would
 17:27:40 18 like to do in Virginia in 2009 different from the
 19 New Jersey 2009 activities?
 20 A. In New Jersey there are strict
 21 restrictions on how you can interact other than
 22 through independent expenditures. In Virginia there

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1 is no restriction on the ability to directly
 2 contribute to candidates, and that's the difference
 17:28:00 3 in the process in Virginia and New Jersey. There
 17:28:03 4 are two different systems where the contributions in
 17:28:06 5 New Jersey are limited, so they would have to come
 17:28:08 6 from a different source and a different account,
 17:28:11 7 whereas contributions in Virginia are unlimited, but
 17:28:14 8 there's a different disclosure requirement from a
 17:28:16 9 different account.
 17:28:17 10 So the idea would be to do what was in
 17:28:23 11 place prior to BCRA and have a separate account that
 17:28:27 12 dealt with the kinds of contributions for New Jersey
 17:28:30 13 and a separate account for the kinds of
 17:28:32 14 contributions that would be allowed in Virginia.
 17:28:34 15 Q. In terms of what the RNC would like to
 17:28:37 16 spend the money on out of those accounts, how would
 17:28:40 17 the spending activities differ?
 17:28:42 18 A. From that particular account in Virginia?
 19 Q. Right, versus New Jersey.
 20 A. New Jersey, the ability to spend the money
 21 under New Jersey law would be limited as far as
 22 direct donations to a candidate. And in Virginia



<p style="text-align: center;">153</p> <p>1 It is the RNC's position that a generic Get Out the 2 Vote effort should be funded with 100 percent 17:45:23 3 nonfederal dollars. If, however, there was a 17:45:25 4 reference to a federal candidate and nonfederal 17:45:27 5 candidate, then there could be an allocation, but 17:45:31 6 the idea was a generic message with hundreds of 17:45:34 7 state and local candidates on the ballot with a 17:45:37 8 handful of federal candidates the position is that 17:45:40 9 it would be viewed as that generic kind of message 17:45:43 10 would be viewed paid for 100 percent nonfederal 17:45:46 11 dollars that would be legal under that state law. 17:45:49 12 So in some states it would be more restrictive than 17:45:53 13 other states. 17:45:59 14 BY MR. NOTI: 17:45:59 15 Q. In paragraph 13 of the document, the third 17:46:05 16 sentence says we are merely looking to compete on an 17:46:07 17 equal playing field in these states. Do you see 17:46:14 18 that? 19 A. Yes, I do. 20 Q. An equal playing field with whom? 21 A. With other people that can participate in 22 nonfederal elections. In that particular state,</p>	<p style="text-align: center;">155</p> <p>1 Q. On redistricting, what is the goal of the 2 RNC's redistricting efforts? 17:48:29 3 A. The goal of the RNC redistricting efforts 17:48:33 4 going forward would be equivalent to what it could 17:48:37 5 do in the last redistricting cycle, mainly being 17:48:43 6 able to set up an account made up of nonfederal 17:48:47 7 dollars and to be able to fund an operation as it 17:48:50 8 did in the past bringing in approximately 22 17:48:55 9 individuals to run a redistricting effort from a 17:48:58 10 legal component to a strategic component to a map 17:49:02 11 drawing component to a litigation component. 17:49:04 12 Q. And what would be the intended end goal of 17:49:08 13 all those activities? 17:49:10 14 A. The intended end goal of those activities 17:49:13 15 would be to influence the redistricting efforts in 17:49:16 16 the various states based on the apportionment that 17:49:21 17 will be presented to those states and being able to 17:49:24 18 divide a number of legislative and Congressional 19 districts into a proper format that hopefully would 20 be of a, more of a benefit to us than the opposition 21 party. 22 Q. Grass roots lobbying, what has the RNC</p>
<p style="text-align: center;">154</p> <p>1 assuming they comply with whatever the state law is, 2 they would be allowed to raise the money under that 17:46:32 3 particular state law and spend it based on what they 17:46:34 4 could raise and subject to their own disclosure 17:46:37 5 requirements. 17:46:37 6 Q. Is the RNC disadvantaged in any way in 17:46:46 7 comparison to the DNC in these state races? 17:46:50 8 A. Only in the fact that the RNC does a lot 17:46:55 9 of that effort on its own where the DNC has other 17:47:01 10 groups that do a lot of that sort of effort on their 17:47:05 11 behalf, including labor organizations and other 17:47:09 12 groups under various guises that benefit them, and, 17:47:15 13 when the RNC and the Republican party does an effort 17:47:19 14 like this, it is a party effort, not an outside 17:47:22 15 effort. So we perceive that to be a disadvantage to 17:47:27 16 the RNC. 17:47:28 17 Q. So you're lumping together the DNC and, 17:47:33 18 and entities outside the DNC, and the reference in 19 the document to an equal playing field seeks to 20 equalize the RNC with the DNC plus the outside 21 groups? 22 A. Yes. Not -- yes.</p>	<p style="text-align: center;">156</p> <p>1 done since 2003 in terms of grass roots lobbying? 2 A. My recollection is that there have been 17:50:46 3 efforts made by the Republican National Committee to 17:50:52 4 promote the President's agenda. My recollection is 17:51:00 5 that they were advertisements put together that on 17:51:04 6 various issues that, for example, support of the 17:51:09 7 troops funding, you know, the whole issue of troop 17:51:13 8 withdrawal and funding of the troops and whether 17:51:16 9 there would be a timetable. There may have been 17:51:18 10 other sort of, sort of other policy issues like that 17:51:25 11 that would have been, that required either radio, 17:51:32 12 television or web productions that would have been 17:51:35 13 put out on behalf of whatever the issue was. 17:51:40 14 Q. Did the RNC conduct any of those 17:51:42 15 activities? 17:51:43 16 A. It is my recollection that it did. 17:51:46 17 Q. Okay. What activities did the RNC 17:51:57 18 actually spend money on? 19 A. My recollection, they were television ads 20 and web ads that were produced and aired on various 21 issues. 22 Q. Can you give us a sense of the aggregate</p>



<p style="text-align: center;">157</p> <p>1 amount that RNC has spent since 2003 on grass roots 2 lobbying? 17:52:24 3 A. I cannot. 17:52:25 4 Q. Okay. Are we talking in the tens of 17:52:30 5 millions of dollars? 17:52:31 6 A. No. 17:52:31 7 Q. In the millions of dollars? 17:52:33 8 A. No. 17:52:34 9 Q. Hundreds of thousands? 17:52:35 10 A. More likely in that range. 17:52:37 11 Q. When the RNC says in this lawsuit that it 17:52:45 12 would like to fund grass roots lobbying with soft 17:52:49 13 money, is that just advertising or are there other 17:52:53 14 things that constitute grass roots lobbying? 17:52:56 15 A. Grass roots lobbying does constitute 17:52:59 16 advertising, but it could include other things, 17:53:02 17 communications to, to grass roots in support of 17:53:08 18 various issues, policies, legislation, but 19 advertising is probably the most costly, but there 20 are other efforts that would obviously be made to 21 attempt to influence various policy decisions. 22 Q. How does RNC decide which issues it's</p>	<p style="text-align: center;">159</p> <p>1 Q. So how does RNC decide in particular grass 2 roots lobbying at whether it's going to mention a 17:55:00 3 particular federal candidate? 17:55:03 4 A. It would depend on the issue, and the 17:55:05 5 Chairman would decide that issue based on assessment 17:55:08 6 from the Political Division and probably the 17:55:11 7 Communications Division as to how best to present 17:55:13 8 the Republican side of that position, whether it 17:55:16 9 would be viewing, you know, the difference between 17:55:19 10 Harry Reid and Mitch McConnell or Nancy Pelosi and 17:55:23 11 Boehner. It depends on the issue. 17:55:25 12 Q. And how would the RNC go about deciding 17:55:30 13 which particular federal candidates to mention, not 17:55:34 14 just candidates in general, but -- 17:55:38 15 A. More than likely it would refer to 17:55:39 16 leadership, and then, if it were addressed to a 17:55:42 17 specific member that was possibly going to take a 17:55:48 18 position that there was an opportunity or in a sense 19 to be able to convince to take a position or at 20 least make it clear from their constituency that 21 this is a position they should be adopting just like 22 any other organization does, that we would have that</p>
<p style="text-align: center;">158</p> <p>1 going to engage in grass roots lobbying over? 2 A. Again, it would depend on figuring out 17:53:43 3 what the issues were, how the parties being 17:53:46 4 perceived, if it is something, obviously, if we have 17:53:49 5 a White House and we're responsible for promoting an 17:53:53 6 agenda, that sort of thing, if we're talking about 17:53:56 7 now the position, for example, ASME has an ad out 17:54:00 8 right now attacking Republican members for their 17:54:05 9 position on the stimulus package, which there is 17:54:07 10 every right for them to do that. That they are 17:54:09 11 spending 100 percent soft money to do that, and 17:54:11 12 that's perfectly legitimate, and, as you know, and 17:54:14 13 the tag line call your Congressman, etc., and tell 17:54:18 14 them get behind this or whatever, that's the kind of 17:54:21 15 thing that we would like to do and be put on the 17:54:25 16 same level playing field with them to be able to do 17:54:28 17 it with the same kind of money they are using based 17:54:32 18 on Wisconsin right to life case where they, 19 corporations and unions can do this all the way up 20 through election day referring to a federal officer 21 holder or candidate in that context, and we'd like 22 to be able to do the same thing.</p>	<p style="text-align: center;">160</p> <p>1 opportunity. 2 Q. The latter set, would those be ads airing 17:56:06 3 in that legislator's district or state? 17:56:09 4 A. If it were geared that way, there would be 17:56:11 5 some ads that would be obviously national against, 17:56:14 6 you know, if it were a position that Republicans 17:56:16 7 versus Democrats on a position like a different 17:56:19 8 position on how to solve this economic problem as 17:56:24 9 opposed to a specific piece of legislation where you 17:56:27 10 are trying to influence the position of a particular 17:56:30 11 member to vote a certain way. 17:56:32 12 Q. And, other than the RNC's decision to 17:56:41 13 spend its hard money on other things, is there 17:56:44 14 anything stopping the RNC from doing all that with 17:56:47 15 hard money? 17:56:48 16 A. No. Again it's the decision of do you use 17:56:51 17 your hard money to make that point and lose the 17:56:55 18 opportunity to get involved in races down the line 19 or do you make the decision to go with the issue ad 20 and not have the money. 21 Q. I'd like to ask the court reporter to mark 22 this as Exhibit G, please.</p>



<p style="text-align: center;">161</p> <p>1 (Deposition Exhibit No. G, RNC Ad, was 2 marked for identification and retained by counsel 17:57:29 3 and retained by counsel.) 17:57:29 4 BY MR. NOTI: 17:57:36 5 Q. This is a document with a Bates stamp, 17:57:41 6 several Bates stamps, but the one at the bottom is 17:57:44 7 ODP 23-02292. Are you familiar with this document? 17:57:53 8 A. Yes. 17:58:06 9 Q. What is it? 17:58:07 10 A. It is an ad produced by the Republican 17:58:14 11 National Committee. 17:58:15 12 Q. Would this ad be grass roots lobbying as 17:58:18 13 the RNC has used that term in this case? 17:58:21 14 A. This ad would represent -- let me quickly 17:58:38 15 read. This was 1996. This would have been more 17:59:05 16 precisely identified at the time more like an issue 17:59:08 17 ad that was, that was typical for party committees 17:59:15 18 to do up until the BCRA legislation. And this ad 19 would have been paid for with a, with an allocation 20 of federal and nonfederal monies. 21 Q. But my question is grass roots lobbying, 22 as the RNC is using that term now in this lawsuit,</p>	<p style="text-align: center;">163</p> <p>1 A. There was a call to action specifically in 2 this case, and in my view there is no call to action 18:00:56 3 in the ad that you are providing here in the sample 18:01:01 4 script dated 4/8/96. 18:01:03 5 Q. What's the call to action in this sample 18:01:05 6 script? 18:01:07 7 A. Call your representative or senator and 18:01:10 8 tell him blah, blah, to oppose any effort to 18:01:13 9 Greenback, the fairness doctrine. That's that one. 18:01:21 10 Q. Oh, I think I misunderstood. So what 18:01:33 11 you're saying is the call to action in the affidavit 18:01:38 12 examples is what makes those grass roots lobbying, 18:01:41 13 and the absence of that from the sample script is 18:01:45 14 what distinguishes this and makes it not grass roots 18:01:48 15 lobbying? 18:01:48 16 A. I'm basically saying the difference is 18:01:51 17 that there is, under grass roots lobbying that was 18:01:54 18 suggested by the affidavit of Mr. Beeson what was 19 intended there was that opportunity to deal similar 20 to what was involved in the Wisconsin case that was 21 a call to action to do something in the legislative 22 process, and both of those examples reflect that.</p>
<p style="text-align: center;">162</p> <p>1 would this be grass roots lobbying? 2 A. The RNC provided examples of what it would 17:59:45 3 consider part of that grass roots lobbying effort. 17:59:50 4 You would have to dissect that on a subjective 17:59:53 5 basis, whether you think it makes it or not, but it 17:59:55 6 gave you examples specifically of what it was 17:59:58 7 intending to do and how it was going to do it. 18:00:02 8 Q. And that's, paragraph 11 of the Beeson 18:00:08 9 affidavit provides examples. However, the premise 18:00:11 10 of this lawsuit is that the RNC would be deciding 18:00:13 11 going forward not just on these particular ads, but 18:00:18 12 in general which ads would constitute grass roots 18:00:22 13 lobbying and, therefore, would be fundable with soft 18:00:25 14 money. So my question is you've referred to a 18:00:30 15 subjective determination. I'm asking whether, as 18:00:33 16 the term is used in this lawsuit, if this ad is 18:00:37 17 grass roots lobbying? 18:00:38 18 A. Not based on the examples that were 19 provided by Mr. Beeson. 20 Q. What's the difference between these and 21 the examples that makes this one not grass roots 22 lobbying?</p>	<p style="text-align: center;">164</p> <p>1 Q. Okay. 2 MR. NOTI: Would you please mark this as 18:02:16 3 the next exhibit? 18:02:16 4 (Deposition Exhibit No. H, RNC Ad, was 5 marked for identification and retained by counsel 18:02:31 6 and retained by counsel.) 18:02:31 7 BY MR. NOTI: 18:02:40 8 Q. This is a document at the bottom Bates 18:02:43 9 stamped ODP 29-00041. Are you familiar with this 18:02:59 10 document? 18:03:00 11 A. Unfortunately, yes. 18:03:11 12 Q. What is it? 18:03:12 13 A. It is another script entitled Tax Too 18:03:17 14 Much, and I believe it has a script date on it of 18:03:24 15 10/1/1998. 18:03:26 16 Q. And would this be grass roots lobbying as 18:03:31 17 the RNC has used that term in this case? 18:03:35 18 A. Well, in this case it's referring to a 19 State Senate candidate, and there is a call to 20 action to call him and tell him to keep working for 21 lower taxes, and there is a legislative history 22 there, and so the answer is yes.</p>



<p style="text-align: center;">165</p> <p>1 MR. NOTI: Would you please mark this as 2 Exhibit I? 18:04:56 3 (Deposition Exhibit No. I, RNC Ad, was 4 marked for identification and retained by counsel 18:05:08 5 and retained by counsel.) 18:05:08 6 BY MR. NOTI: 18:05:16 7 Q. This document has a Bates stamp ODP 18:05:21 8 23-02308. As you review it, I'll say I'm going to 18:05:56 9 ask you the same question I asked you about the 18:05:58 10 previous two. Is this grass roots lobbying as the 18:06:13 11 RNC has used that term in this case? 18:06:16 12 A. In my view, this is the classic issue ad 18:06:19 13 that was prevalent pre BCRA. I don't think it meets 18:06:25 14 the standard that the RNC was referring to in its 18:06:30 15 request in the affidavit of Mr. Beeson. 18:06:32 16 Q. And why? 18:06:33 17 A. There is again, there's no reference to 18:06:36 18 any particular piece of legislation or action. It's 19 referring in general terms to the Clinton record 20 versus the statements, and I just don't see any sort 21 of, you know, call to action to do anything other 22 than, you know, just tell them you won't be fooled</p>	<p style="text-align: center;">167</p> <p>1 Q. What determines for purposes of grass 2 roots lobbying whether an issue is pending? 18:08:18 3 A. Something that has some relevance to 18:08:24 4 action, either a bill that had been passed waiting 18:08:27 5 for a veto at the White House or a bill that is 18:08:31 6 pending before the Congress either as a result of 18:08:35 7 Presidential request or against Presidential 18:08:39 8 request, but something that was much more in tune 18:08:41 9 with whatever was on the agenda. It didn't have to 18:08:44 10 be necessarily an immediate, but, for example, if 18:08:47 11 Harry Reid had put out a statement that we were 18:08:50 12 going to take up car check at the end of, before the 18:08:56 13 end of the session, that even though it wasn't 18:08:59 14 pending before the legislator, now it was going to 18:09:02 15 be part of an agenda and an issue that the Democrats 18:09:05 16 were promoting or again the stimulus plan. If there 18:09:09 17 were no sort of hard core legislation pending, but 18:09:12 18 it was, everyone knew there was going to be some 19 action before the Congress and the President was 20 going to take some action, that that would be a 21 perfect opportunity with something that was more 22 going to happen now or in the future as opposed to</p>
<p style="text-align: center;">166</p> <p>1 again. There is nothing specific to refer to. It 2 doesn't refer to any particular tax legislation or 18:07:02 3 anything else that would be pending before the 18:07:05 4 Congress. 18:07:07 5 Q. Although there is a reference to vetoes on 18:07:15 6 several bills, and presumably, if they were vetoed, 18:07:18 7 they were specific bills; correct? 18:07:20 8 A. He vetoed a series of -- but there is 18:07:23 9 nothing pending that would require any sort of 18:07:25 10 independent action by why you would be generating a 18:07:29 11 grass roots lobbying effort to, unless there was 18:07:33 12 something, again, not knowing what at the time could 18:07:36 13 have been pending, that there would have been a 18:07:38 14 reason to make a specific reference to don't veto 18:07:42 15 this particular bill or something that would be in 18:07:45 16 effect, you know, send your, you know, send your 18:07:49 17 e-mails to the White House and tell Clinton to, you 18:07:53 18 know, stop this veto or whatever, but I just, I 19 think there is a distinction. Again, this was a 20 classic issue ad comparing without the express 21 advocacy words, and I think this is not what we were 22 referring to as grass roots lobbying.</p>	<p style="text-align: center;">168</p> <p>1 something that already occurred. 2 Q. So, if a welfare reform bill had been 18:09:31 3 introduced in the House or the Senate at the time 18:09:33 4 that this ad ran, would this then be grass roots 18:09:38 5 lobbying? 18:09:42 6 A. I would probably want to tweak it to make 18:09:46 7 it clear that you're trying to get people to, you 18:09:49 8 know, tell President Clinton you won't be fooled 18:09:52 9 again. Don't veto, you know, don't veto again or 18:09:56 10 something like that to make some sort of a reference 18:09:59 11 back to something that was in the future, not in the 18:10:02 12 past. But, if there was some welfare reform 18:10:06 13 legislation pending, I think it would be fair game, 18:10:07 14 and this could be tweaked to satisfy it. 18:10:10 15 Q. And in reality, I haven't checked, but in 18:10:14 16 reality there probably was some welfare reform 18:10:17 17 legislation that had been introduced by some member 18:10:19 18 of Congress pending in some committee, even if it 19 was never going to see the light of day; right? 20 Would that level of potential legislation satisfy 21 the test? 22 A. I think it has to be more than somebody</p>



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1 thinking that they may occur. I think there has to
 2 be some idea that something will occur in this
 18:10:41 3 particular legislative Congress. But, again, we're
 18:10:48 4 looking at something in isolation, and I don't know
 18:10:50 5 all of the background information which could very
 18:10:53 6 well influence whether I thought this was legitimate
 18:10:59 7 grass roots lobbying or not.
 18:11:00 8 Q. And by background information are you
 18:11:03 9 referring to the legislative status of bills of --
 18:11:07 10 excuse me -- legislative status of bills related to
 18:11:11 11 the topics discussed in the ad?
 18:11:14 12 A. As I said earlier, this was a classic
 18:11:17 13 issue ad that was prevalent at the time. It wasn't
 18:11:20 14 necessarily related to grass roots lobbying. And so
 18:11:27 15 there could be circumstances where based on what was
 18:11:30 16 pending it could have been a, it could have been
 18:11:34 17 morphed into something that would be termed grass
 18:11:38 18 roots, but it certainly doesn't meet the criteria
 19 that we have proposed as part of our scripts as far
 20 as what would constitute grass roots lobbying.
 21 Q. What criteria are you referring to?
 22 A. Well, there is a reference to, in both of

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1 these, something that is going to be considered or
 2 is planning to be considered by this session of
 18:12:01 3 Congress, and there's a call to action to someone
 18:12:04 4 who has influence over the final outcome of this to
 18:12:08 5 do something. And we're asking people in the grass
 18:12:12 6 roots to go out and try to communicate with that
 18:12:20 7 particular person to take a position on this.
 18:12:22 8 Q. One more. Would you please mark this as
 18:13:27 9 J?
 18:13:28 10 (Deposition Exhibit No. J, RNC Ad, was
 11 marked for identification and retained by counsel
 18:13:38 12 and retained by counsel.)
 18:13:38 13 BY MR. NOTI:
 18:13:41 14 Q. This is a document Bates stamped ODP
 18:13:46 15 23-02326. And, after you've had a chance to review
 18:13:54 16 it, let us know if it's grass roots lobbying within
 18:14:02 17 the meaning of that term as the RNC is using it in
 18:14:06 18 this case.
 19 A. I'm sorry. Did you ask a question?
 20 Q. Is this grass roots lobbying as the RNC
 21 has used that term in this case?
 22 A. Again, in the context of where we are now

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1 in the issues pending on both of those issues,
 2 spending and illegal immigration, and there is a,
 18:15:14 3 the call is to tell the President to stop giving
 18:15:18 4 benefits to illegals and not, and end wasteful
 18:15:21 5 Washington spending, I think it does meet the
 18:15:23 6 criteria and particularly of the strong sense of the
 18:15:28 7 RNC not only in its positions and resolutions, but
 18:15:33 8 also in party platform this would be exactly where
 18:15:36 9 we would want our grass roots people to contact the
 18:15:39 10 sitting President and make those points very clear.
 18:15:42 11 Q. Thank you. The next activity is
 18:16:00 12 litigation, specifically the fees and expenses
 18:16:06 13 associated with this case. Has the RNC already paid
 18:16:10 14 such fees?
 18:16:11 15 MR. BOPP: Object. Attorney-client
 18:16:13 16 privilege.
 18:16:13 17 MR. NOTI: I'm not asking for privileged
 18:16:15 18 information. Just the payment of fees.
 19 BY MR. NOTI:
 20 Q. Has the RNC paid fees associated with the
 21 case? Don't tell me anything you've discussed with
 22 your attorneys. Just the payment, which is not

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1 privileged.
 2 A. Having not -- I don't know. Maybe more
 18:17:18 3 precisely is that I am not aware. Obviously,
 18:17:24 4 expenditures that are made to any, any source are
 18:17:30 5 subject of public record when they are, when they
 18:17:34 6 are made, and I am not aware of any payments being
 18:17:44 7 made.
 18:17:50 8 Q. Does the RNC intend to make such payments?
 18:17:56 9 A. Yes.
 18:18:06 10 Q. If you look at paragraph 15 of the
 18:18:20 11 affidavit, which is on page six --
 18:18:24 12 A. Yes.
 18:18:24 13 Q. -- what is other miscellaneous litigation
 18:18:36 14 not related to federal elections?
 18:18:40 15 A. From time to time, like any other major
 18:18:43 16 entity, the RNC may have a number of lawsuits filed
 18:18:50 17 against it. It could be a trademark issue. It
 18:18:54 18 could be a personnel issue. It could be some vendor
 19 issue, and so those occur from time to time like any
 20 other entity.
 21 Q. What about litigation related to
 22 nonfederal elections, gubernatorial recount case?



<p style="text-align: center;">173</p> <p>1 Would that fall within this category?</p> <p>2 A. If it were litigation that somehow the RNC</p> <p>18:19:33 3 were engaged in, it could.</p> <p>18:19:38 4 Q. What about, what about litigation</p> <p>18:19:43 5 involving voter registration/voter fraud or voter ID</p> <p>18:19:56 6 issues, those types of things?</p> <p>18:19:59 7 A. Certainly since most of these provisions</p> <p>18:20:02 8 are state legal issues, yes.</p> <p>18:20:07 9 Q. Yes, it would fall within the description</p> <p>18:20:10 10 in the affidavit?</p> <p>18:20:11 11 A. Yes, yes.</p> <p>18:21:03 12 Q. Does the RNC ever engage in litigation to</p> <p>18:21:08 13 help Republican candidates win federal elections?</p> <p>18:21:12 14 A. I don't know how litigation helps someone</p> <p>18:21:21 15 win a federal election or any election. The voters</p> <p>18:21:24 16 decide who wins or loses an election.</p> <p>18:21:28 17 Q. I guess the most obvious example I could</p> <p>18:21:34 18 think of right now would be, say, the Minnesota</p> <p>19 recount, if the RNC is involved in that. Does the</p> <p>20 RNC do anything along those lines that is litigation</p> <p>21 that helps candidates get into office?</p> <p>22 A. Generally speaking, the litigation is</p>	<p style="text-align: center;">175</p> <p>1 voter fraud, isn't the RNC's goal in engaging in</p> <p>2 those suits to help its candidates?</p> <p>18:24:00 3 A. RNC's involvement in those suits is to</p> <p>18:24:03 4 make sure that every qualified voter votes and the</p> <p>18:24:07 5 vote isn't diluted because, and it's based on</p> <p>18:24:11 6 protecting its voters rather, and that's the purpose</p> <p>18:24:18 7 behind that because somehow the voter is being</p> <p>18:24:21 8 disenfranchised.</p> <p>18:24:29 9 Q. But isn't part of the goal also to help</p> <p>18:24:32 10 Republican candidates get elected?</p> <p>18:24:35 11 A. Part of the goal is that when, whether</p> <p>18:24:37 12 Republicans or Democrats are going to the polls,</p> <p>18:24:41 13 that they have, they are going on the same basis,</p> <p>18:24:44 14 and they are not being denied their right to vote,</p> <p>18:24:47 15 and, based on that, no matter what the outcome is</p> <p>18:24:50 16 that that will satisfy the process, that as long as</p> <p>18:24:54 17 the process is being followed that's the goal of why</p> <p>18:24:58 18 those lawsuits are instituted.</p> <p>19 Q. So that type of litigation would fall</p> <p>20 within the description -- excuse me. Litigation</p> <p>21 regarding voter fraud as you've described it would</p> <p>22 fall within the description of miscellaneous</p>
<p style="text-align: center;">174</p> <p>1 either conducted by the candidate, him or herself,</p> <p>2 and/or the state party based on normally what is</p> <p>18:22:07 3 allowed and required under state law under those</p> <p>18:22:11 4 contests and recount provisions.</p> <p>18:22:15 5 Q. But, even if that's the normal case, does</p> <p>18:22:17 6 the RNC ever litigate for electoral purposes?</p> <p>18:22:31 7 A. I guess I don't understand the question.</p> <p>18:22:36 8 Q. Does the RNC ever engage in litigation</p> <p>18:22:41 9 with the intention of that engagement helping</p> <p>18:22:48 10 Republican candidates win federal elections?</p> <p>18:22:52 11 A. The RNC has engaged in litigation</p> <p>18:22:56 12 regarding ballot access and, and voter fraud and</p> <p>18:23:10 13 issues like that, but I don't know if that responds</p> <p>18:23:22 14 to your question because, as I said earlier, you</p> <p>18:23:27 15 don't litigate to win or influence elections. You</p> <p>18:23:31 16 litigate because there is a particular statute that</p> <p>18:23:34 17 is either not being applied or is being applied</p> <p>18:23:39 18 unconstitutionally.</p> <p>19 Q. But so --</p> <p>20 A. That affects voters, not necessarily</p> <p>21 candidates.</p> <p>22 Q. So taking the example you just gave of</p>	<p style="text-align: center;">176</p> <p>1 litigation not related to federal elections; is that</p> <p>2 correct?</p> <p>18:25:47 3 A. Yes.</p> <p>18:25:47 4 Q. Since 2003, has the RNC ever solicited</p> <p>18:26:02 5 funds specifically for any of these activities that</p> <p>18:26:08 6 we've just discussed? Meaning state elections,</p> <p>18:26:12 7 litigation, redistricting or grass roots lobbying.</p> <p>18:26:16 8 A. Not that I'm aware of.</p> <p>18:26:17 9 Q. Has the Chairman of the RNC ever solicited</p> <p>18:26:22 10 funds specifically for those purposes?</p> <p>18:26:24 11 A. Not that I'm aware of.</p> <p>18:26:26 12 Q. Why not?</p> <p>18:26:32 13 A. The Chairman is, would be raising funds to</p> <p>18:26:38 14 make a budget to fully fund the federal account</p> <p>18:26:41 15 based on the contribution limits and restrictions</p> <p>18:26:44 16 applicable. The decisions of how the monies are</p> <p>18:26:47 17 spent is based on the nature of whether that budget</p> <p>18:26:51 18 is met, and so, therefore, there is generally no</p> <p>19 discussion of a particular use of the money other</p> <p>20 than general things that you'll find in our</p> <p>21 solicitation letters that talk in terms of</p> <p>22 supporting candidates from the courthouse to the</p>



<p style="text-align: center;">177</p> <p>1 White House, supporting and getting our message out 2 to counter, you know, what the message is from the 18:27:16 3 media, etc., etc., but there is never any sort of 18:27:20 4 specific request that I am aware of that we would 18:27:23 5 put something out and say we need to raise \$300,000 18:27:26 6 for a grass roots lobbying effort to support this 18:27:30 7 position or we need to raise X number of dollars so 18:27:33 8 that we can support, but we, gubernatorial 18:27:37 9 candidates, but we do say we want to raise money to 18:27:40 10 support our entire Republican team from the 18:27:44 11 courthouse to the White House, things like that. We 18:27:47 12 may make reference to elections that are occurring, 18:27:54 13 but there's nothing specifically earmarked to say we 18:27:58 14 want money for this particular purpose. 18:28:06 15 Q. If the RNC were to win this lawsuit then, 18:28:09 16 how would it go about raising money only for these 18:28:14 17 specified activities? 18:28:16 18 A. Pre BCRA we, in fact, did raise money for 19 specific accounts. Pre BCRA the RNC had 13 what we 20 call Republican national state election committee 21 accounts. We lovingly refer to them as RNSEC, and 22 RNSEC had 13 different nonfederal accounts in order</p>	<p style="text-align: center;">179</p> <p>1 Q. But, if it helps raise the money, you can 2 spend whatever you want once it comes in. If it 18:30:11 3 helps raise money to tell people we're going to use 18:30:14 4 it for grass roots lobbying, why not do that now in 18:30:17 5 the current world? 18:30:19 6 A. Because people who are interested in grass 18:30:21 7 roots lobbying more than likely are more than 18:30:23 8 interested in giving money so the party can support 18:30:26 9 its federal candidates, and based on the fact that 18:30:29 10 there are limits on what can be, what they can give 18:30:33 11 there are also limits to what can be spent, and that 18:30:36 12 priority system, it is more difficult to raise money 18:30:39 13 for a specific purpose as opposed to supporting the 18:30:43 14 entire RNC operation. 18:30:46 15 Q. To be clear, when you say there are limits 18:30:48 16 on what can be spent, are you referring to the 18:30:50 17 limits based on the funds that the RNC has? 18:30:55 18 A. Yes. 19 Q. Not any legal limits? 20 A. No. 21 Q. So the way that you envision doing these 22 solicitations if you were to win this suit is the</p>
<p style="text-align: center;">178</p> <p>1 to comply with the various state requirements. And 2 so it would be a pattern that would be reinstated 18:28:56 3 so that there would be specific accounts set up to 18:28:59 4 be able to raise money for specific purposes. 18:29:04 5 With regard to there are donors, for 18:29:06 6 example, that may be much more interested in getting 18:29:09 7 involved in redistricting account, and there may be 18:29:14 8 others that may be involved in state and local 18:29:16 9 races, and there may be others involved that would 18:29:19 10 get involved because of grass roots lobbying. So 18:29:22 11 the concept is not alien to what we've done in the 18:29:26 12 past. 18:29:26 13 Q. So why not, if there are donors who would 18:29:29 14 be excited to give to those causes, why not solicit 18:29:34 15 them for those things now? 18:29:35 16 A. Because it would be, we are limited to a 18:29:39 17 finite contribution per year, and there's a finite 18:29:46 18 limit placed on that donor per site per year as well 19 for party and PACs. And to be able to be honest 20 about it to try to dissect and bifurcate that into 21 different areas takes away the flexibility to make 22 decisions on how best to spend those hard dollars.</p>	<p style="text-align: center;">180</p> <p>1 way the RNC did them pre BCRA? 2 A. Yes. There would be specific monies 18:31:09 3 raised nonfederally for specific nonfederal purposes 18:31:12 4 that would not influence federal elections. 18:31:35 5 Q. You can put that document aside. Thanks. 18:31:48 6 Would you please mark this as Exhibit K? 18:31:51 7 (Deposition Exhibit No. K, Document, was 8 marked for identification and retained by counsel 18:32:02 9 and retained by counsel.) 18:32:02 10 BY MR. NOTI: 18:32:11 11 Q. Are you familiar with this document? 18:32:12 12 A. Yes, I am. 18:32:16 13 Q. Take as much time as you need to review 18:32:18 14 it, but the questions I'm going to be asking you 18:32:21 15 relate to pages five and page six to seven. 18:32:32 16 A. Okay. 18:32:33 17 Q. Looking at page five, why did the RNC 18:32:42 18 decide to disburse \$500 to the Maine gubernatorial 19 candidate in 2004? 20 A. Peter Kinget was a member of the RNC who 21 was running for governor, and it was an effort to 22 demonstrate the support of the committee on his</p>



<p style="text-align: center;">181</p> <p>1 behalf. And the \$500 limit was the maximum</p> <p>2 contribution you could give in Maine.</p> <p>18:33:14 3 Q. And why did the RNC spend \$292,000 --</p> <p>18:33:27 4 excuse me -- disburse \$292,000 to New Jersey county</p> <p>18:33:32 5 parties in 2005?</p> <p>18:33:34 6 A. To try to get the ticket, the state ticket</p> <p>18:33:41 7 in New Jersey elected in that election year for</p> <p>18:33:45 8 state and local candidates. We had been engaged in</p> <p>18:33:49 9 New Jersey prior to BCRA as well, and it was a</p> <p>18:33:58 10 situation where there was a gubernatorial campaign</p> <p>18:34:01 11 and state legislative races, and the RNC made the</p> <p>18:34:06 12 decision to get involved.</p> <p>18:34:10 13 Q. What was the money spent on?</p> <p>18:34:12 14 A. It is basically a generic Get Out the Vote</p> <p>18:34:15 15 effort, and under New Jersey law it had to be</p> <p>18:34:20 16 divided among all of the county parties who are</p> <p>18:34:24 17 considered the beneficiaries of that and treated and</p> <p>18:34:27 18 reported as in kind contributions to those county</p> <p>19 parties.</p> <p>20 Q. And why did the RNC disburse the funds</p> <p>21 that it did to Louisiana in 2007?</p> <p>22 A. Basically to try to help now Governor</p>	<p style="text-align: center;">183</p> <p>1 granted the relief it seeks, the RNC, and then later</p> <p>2 in the paragraph beginning on the top of page seven,</p> <p>18:36:47 3 would instruct its staff not to facilitate any</p> <p>18:36:50 4 one-on-one meetings or other individualized contact</p> <p>18:36:52 5 between contributors and federal candidates and</p> <p>18:36:54 6 office holders. Does the RNC currently instruct its</p> <p>18:37:02 7 staff not to do this activity?</p> <p>18:37:04 8 A. Yes.</p> <p>18:37:05 9 Q. How is that instruction given?</p> <p>18:37:11 10 A. Basically, through the Finance Division</p> <p>18:37:20 11 the employees are instructed not to provide any such</p> <p>18:37:27 12 opportunities.</p> <p>18:37:28 13 Q. Instructed by whom?</p> <p>18:37:30 14 A. By the Finance Division Director.</p> <p>18:37:36 15 Q. What about employees outside the Finance</p> <p>18:37:38 16 Division? Are they instructed not to facilitate</p> <p>18:37:41 17 one-on-one meetings?</p> <p>18:37:43 18 A. The donors only operate through the</p> <p>19 Finance Division. There is no other donor system</p> <p>20 where that occurs. It's just the nature of --</p> <p>21 anybody that's a donor that calls in is referred to</p> <p>22 the Finance Division.</p>
<p style="text-align: center;">182</p> <p>1 Jindal win that gubernatorial campaign.</p> <p>2 Q. And to go back to an issue we touched on</p> <p>18:34:56 3 earlier, did it have anything to do with his</p> <p>18:34:59 4 Presidential prospects?</p> <p>18:35:01 5 A. Absolutely not.</p> <p>18:35:03 6 Q. And Kentucky, was that the Kentucky</p> <p>18:35:07 7 governor's race?</p> <p>18:35:10 8 A. Yes, it was.</p> <p>18:35:11 9 Q. The chart at the bottom of the page</p> <p>18:35:15 10 regarding redistricting, we have some documents on</p> <p>18:35:20 11 this, but to clarify was this all for mapping</p> <p>18:35:27 12 software?</p> <p>18:35:28 13 A. It's preserving licensing arrangements for</p> <p>18:35:31 14 that to preserve it for future use. Obviously, it's</p> <p>18:35:34 15 not a time when we would be involved, but things</p> <p>18:35:37 16 have to be renewed from time to time, yes.</p> <p>18:35:39 17 Q. Turning to the response to Question 4</p> <p>18:35:44 18 which begins at the bottom of page six and continues</p> <p>19 on to page seven, take a moment and read it, and</p> <p>20 I'll ask you about it.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. So the response begins, if it is</p>	<p style="text-align: center;">184</p> <p>1 Q. But what if a donor runs into an RNC staff</p> <p>2 member at an event, not a Finance Division, just</p> <p>18:38:07 3 somebody, an advance person, anybody, and says, hey,</p> <p>18:38:11 4 I'd really like a meeting with Senator such and</p> <p>18:38:14 5 such? Has that person been instructed not to</p> <p>18:38:16 6 facilitate the meeting?</p> <p>18:38:18 7 A. That person would be instructed to refer</p> <p>18:38:20 8 that, any request from a donor to the Finance</p> <p>18:38:23 9 Division.</p> <p>18:38:23 10 Q. Are the Finance Division employees</p> <p>18:38:28 11 provided any written guidance as to what they may or</p> <p>18:38:32 12 may not, what interaction they may or may not</p> <p>18:38:38 13 facilitate between donors and federal office</p> <p>18:38:40 14 holders?</p> <p>18:38:42 15 A. They are instructed, to my knowledge, to</p> <p>18:38:45 16 only, not to facilitate, but to provide a phone</p> <p>18:38:54 17 number and a person to contact if they have, if they</p> <p>18:38:57 18 wish to talk to any office holder.</p> <p>19 Q. I apologize. I may have misspoke. Is the</p> <p>20 guidance that they are provided in writing?</p> <p>21 A. Not that I'm aware.</p> <p>22 MR. NOTI: Would you please mark this as</p>



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1 Exhibit L.
 2 (Deposition Exhibit No. L, Complaint for
 3 Declaratory Injunctive Relief, was marked for
 4 identification and retained by counsel and retained
 18:39:42 5 by counsel.)
 18:39:42 6 BY MR. NOTI:
 18:39:53 7 Q. Are you familiar with this document?
 18:39:55 8 A. Yes.
 18:39:55 9 Q. This is a document in this case that is
 18:39:59 10 captioned titled Complaint for Declaratory
 18:40:03 11 Injunctive Relief. I'm only going to ask you about
 18:40:07 12 paragraph 26. Excuse me. That was wrong. I
 18:41:06 13 apologize. Would you – my notes had the wrong
 18:41:11 14 document. Would you please turn back to the
 18:41:14 15 affidavit of Mr. Beeson, which is Exhibit F?
 18:41:21 16 A. Yes.
 18:41:21 17 Q. Thank you. And I'd like to ask you about
 18:41:24 18 paragraph 21, which begins on page seven. And
 19 specifically I'm only going to ask you about the
 20 last sentence.
 21 A. Okay.
 22 Q. What or how has the RNC been negatively

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1 affected by the explosion of Internet fund raising?
 2 A. I think that the explosion of Internet
 18:42:42 3 fund raising has allowed various groups to raise
 18:42:49 4 additional resources and particularly if it is, if
 18:42:58 5 it's fund raising for other groups that, that again
 18:43:02 6 affects the ability of the RNC to get the maximum,
 18:43:06 7 and also our fund raising programs are not, as
 18:43:11 8 indicated earlier, are based more on direct mail and
 18:43:16 9 other sources of income as opposed to Internet fund
 18:43:19 10 raising, so there has been an explosion of Internet
 18:43:22 11 fund raising, and, unfortunately, we haven't been
 18:43:25 12 able to compete effectively in that area.
 18:43:29 13 Q. I understand the second part of your
 18:43:32 14 answer, but the first part I didn't follow as to
 18:43:37 15 other groups. Can you explain what you meant by
 18:43:39 16 that?
 18:43:39 17 A. Well, sure. Assuming for the moment it's
 18:43:44 18 federal fund raising and it's other parties and
 19 PACs, that affects the ability to, it does affect
 20 the aggregate limits that are available remaining in
 21 federal monies. Also, if they are not federal
 22 committees, it allows other groups to increase their

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1 resources to be able to do the kinds of advertising
 2 on issues, to be able to spend money on
 18:44:15 3 redistricting, to be able to do a whole host of
 18:44:19 4 things where, obviously, we're regulated by federal
 18:44:22 5 funds to do and that makes us at a distinct
 18:44:25 6 disadvantage.
 18:44:25 7 Q. As to the aggregate limit, are you saying
 18:44:28 8 that the ease of Internet fund raising means people
 18:44:33 9 are more likely to hit their aggregate limit than
 18:44:37 10 they were in the days prior to Internet fund
 18:44:40 11 raising?
 18:44:40 12 A. The more activity there is in fund raising
 18:44:42 13 perhaps the less amount of money is ultimately
 18:44:46 14 available based on who they are, who is raising the
 18:44:49 15 money. So it does have a negative impact, but I
 18:44:54 16 think the primary purpose is the competition and
 18:44:58 17 others, particularly the nonfederal committees, to
 18:45:01 18 be able to use that vehicle to effectively, without
 19 much cost, raise money to be able to do their issue
 20 ads and other kinds of activities has a negative
 21 impact on us.
 22 Q. But anything they can do you can do;

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1 right?
 2 A. Limited to hard dollars. For example,
 18:45:21 3 there is a union group out there that has already
 18:45:24 4 effectively committed, if not spent, more than
 18:45:27 5 \$17 million of nonfederal funds for redistricting.
 18:45:32 6 And those are the kinds of things. Then there's the
 18:45:35 7 issue ad component where, based on who you are and
 18:45:38 8 what you're doing, you don't even have to be a
 18:45:40 9 political entity to go out and raise money through
 18:45:43 10 the Internet to be able to effectively put on an
 18:45:46 11 issue ad cam page or I should say a grass roots
 18:45:50 12 lobbying campaign where, again, we'll be restricted
 18:45:53 13 on the kinds of money we raise. So there is the
 18:45:56 14 ability to raise not only federal dollars, but
 18:45:58 15 nonfederal dollars that definitely is in competition
 18:46:02 16 with us.
 18:46:07 17 Q. But, as to hard dollars, the RNC, there's
 18:46:15 18 no reason that the RNC can't raise hard dollars over
 19 the Internet in the same way and with the same
 20 effect as any other hard money group, is there?
 21 A. Correct. We attempt to raise it. It's
 22 not productive, so the competition is there because



<p style="text-align: center;">189</p> <p>1 others can, and we can't.</p> <p>2 Q. The next clause in the sentence refers to</p> <p>18:46:38 3 barriers to collaborative relationships between</p> <p>18:46:41 4 national party and state parties. What is that</p> <p>18:46:43 5 referring to?</p> <p>18:46:45 6 A. That refers to the inability, I mean, the</p> <p>18:46:48 7 barriers exist in a number of ways. The barriers to</p> <p>18:46:54 8 be able to effectively talk about the ability to</p> <p>18:47:01 9 spend money on behalf of gubernatorial campaigns and</p> <p>18:47:06 10 sort of help direct the spending of that money on</p> <p>18:47:09 11 specific resources. The ability that, when we do</p> <p>18:47:14 12 transfer money to a state party for Get Out the Vote</p> <p>18:47:18 13 efforts, even though on paper state parties could</p> <p>18:47:21 14 use a certain portion of so called Levin funds for</p> <p>18:47:26 15 that effort, once the RNC transfers the money and</p> <p>18:47:30 16 any dollars spent on that GOT effort it's 100</p> <p>18:47:34 17 percent federal, and there's no Levin funds</p> <p>18:47:37 18 involved.</p> <p>19 The inability to basically get engaged in</p> <p>20 anything that would be viewed as nonfederal with the</p> <p>21 state party again I think is a real concern that,</p> <p>22 you know, everything that we do has to be federal,</p>	<p style="text-align: center;">191</p> <p>1 referring to the fact that national political</p> <p>2 parties -- well, excuse me. What is this referring</p> <p>18:49:24 3 to?</p> <p>18:49:24 4 A. Again the inequity of whether it be a</p> <p>18:49:29 5 group or corporation labor organization do grass</p> <p>18:49:31 6 roots lobbying, a nonprofit doing grass roots</p> <p>18:49:34 7 lobbying, organization set up, redistricting efforts</p> <p>18:49:37 8 on behalf of their state parties like the union</p> <p>18:49:42 9 effort. It creates an ability for others to get</p> <p>18:49:47 10 engaged with unlimited nonfederal resources where,</p> <p>18:49:51 11 if the RNC gets engaged, it is limited to its</p> <p>18:49:56 12 federal resources, and then it becomes a budget</p> <p>18:49:59 13 issue as to whether or not the effort can be a grass</p> <p>18:50:02 14 roots lobbying effort, a redistricting effort or a</p> <p>18:50:07 15 campaign effort.</p> <p>18:50:10 16 Q. Well, on the other hand, though, the RNC</p> <p>18:50:13 17 can raise hard money \$30,000 a person, and every</p> <p>18:50:18 18 other, basically every other entity that wants to</p> <p>19 raise federal funds is limited to \$5,000. I mean,</p> <p>20 that is, does that at all counterbalance the</p> <p>21 inequity that's being described here?</p> <p>22 A. No. Certainly other groups out there,</p>
<p style="text-align: center;">190</p> <p>1 and by us getting engaged with the state party it</p> <p>2 basically federalizes all of their efforts in any</p> <p>18:48:06 3 generic sense. So, unless their efforts are</p> <p>18:48:09 4 candidate specific nonfederal, and again under the</p> <p>18:48:12 5 FEC's own interpretation the most you can say is</p> <p>18:48:16 6 vote for that nonfederal candidate on a specific day</p> <p>18:48:20 7 talking about even ballot access, absentee ballots,</p> <p>18:48:25 8 any sort of reference to where the polling places</p> <p>18:48:28 9 are, that becomes all federalized.</p> <p>18:48:34 10 Q. So you're referring to RNC financial</p> <p>18:48:39 11 involvement with the state parties; is that right?</p> <p>18:48:43 12 A. And directing the spending of the monies</p> <p>18:48:46 13 that the state party raises for its nonfederal</p> <p>18:48:50 14 efforts.</p> <p>18:48:50 15 Q. The RNC and state parties can coordinate;</p> <p>18:48:54 16 correct?</p> <p>18:48:55 17 A. They can coordinate on various activities,</p> <p>18:48:57 18 but there cannot be any sort of direction of the</p> <p>19 spending of any sort of soft dollars.</p> <p>20 Q. And, finally, the last clause of the</p> <p>21 paragraph refers to inequality of restrictions on a</p> <p>22 party's ability to raise and spend funds. Is this</p>	<p style="text-align: center;">192</p> <p>1 whether they are federal groups or not, 527's can</p> <p>2 coordinate their efforts. The FEC already</p> <p>18:50:46 3 sanctioned that. The RNC cannot coordinate its</p> <p>18:50:49 4 efforts with any sort of outside groups, so I think</p> <p>18:50:52 5 there is an inequity there.</p> <p>18:50:54 6 Q. Okay. One final question about this</p> <p>18:51:11 7 document before we put it aside. Are all of the</p> <p>18:51:16 8 statements and factual assertions in it still true</p> <p>18:51:24 9 despite the change in RNC leadership?</p> <p>18:51:28 10 A. Yes.</p> <p>18:51:28 11 Q. Okay. And despite the fact that</p> <p>18:51:35 12 Mr. Beeson is no longer the Political Director?</p> <p>18:51:37 13 A. Yes.</p> <p>18:51:39 14 Q. So everything that this affidavit says the</p> <p>18:51:41 15 RNC would like to do and the manner in which it</p> <p>18:51:45 16 would like to do it is till what the RNC would like</p> <p>18:51:49 17 to do and how it would like to do it; correct?</p> <p>18:51:52 18 A. Correct.</p> <p>19 MR. BOPP: What's your plan?</p> <p>20 MR. NOTI: Let's go off the record.</p> <p>21 (Whereupon, a short recess was taken from</p> <p>22 6:52 to 7:00 p.m.)</p>



<p style="text-align: center;">193</p> <p>1 BY MR. NOTI: 2 Q. When the President of the United States is 19:01:06 3 a Republican, does the President choose the Chairman 19:01:11 4 of the RNC? 19:01:12 5 A. The President offers his selection to the 19:01:19 6 RNC, and there's still a vote. As a practical 19:01:24 7 matter, in my experience at the RNC, that it has 19:01:31 8 never been challenged, but the potential is there 19:01:33 9 for a Presidential selection could be, in fact, 19:01:39 10 voted down by the RNC. It takes a majority of the 19:01:43 11 168 members to do so. 19:01:45 12 Q. So, while there is a vote to confirm the 19:01:50 13 President's selection, that selection has always 19:01:53 14 been confirmed in the past? 19:01:55 15 A. Well, I couldn't classify it as a 19:01:57 16 confirmation. The selection is actually elected by 19:02:01 17 the body. I would not classify it as a 19:02:04 18 confirmation. It's still an election, and it 19 requires the majority vote of the membership. 20 Q. And the President's nominee, so to speak, 21 has always been elected? 22 A. In my recollection, and I believe</p>	<p style="text-align: center;">194</p> <p>1 historically that has been the case, but just to 2 clarify it's not an automatic given. There's still 19:02:27 3 a vote, and there is a potential for the RNC 19:02:30 4 membership as a separate body from making its own 19:02:34 5 decision. 19:02:35 6 Q. Does the President, other than through the 19:02:42 7 nomination of the Chairman, does the President have 19:02:44 8 influence over the RNC's strategic decisions? 19:02:50 9 A. There is cooperation between the political 19:02:54 10 office of the White House and the RNC on decisions 19:03:00 11 that are made, but, ultimately, it is the RNC 19:03:03 12 decision how it will spend its resources. 19:03:06 13 Q. What kind of cooperation is there? 19:03:11 14 A. Meetings between the political operatives 19:03:17 15 of both the White House and the RNC, sit down and 19:03:21 16 discuss, for example, competitive races, targeted 19:03:27 17 races, that sort of thing. 19:03:29 18 Q. Where the RNC is going to focus its 19 activities? 20 A. Right. 21 Q. What about fund raising? Does the 22 President have influence over the RNC's fund raising</p>	<p style="text-align: center;">195</p> <p>1 practices and procedures? 2 A. No, but the RNC is dependent on the 19:03:54 3 President attending various events. 19:03:59 4 Q. We have received in this case a 19:04:06 5 substantial number of invitations for events with 19:04:10 6 President Bush. What role did, what role did the 19:04:16 7 White House play in the decision to have those 19:04:21 8 events? 19:04:22 9 A. The decision to have the events was 19:04:25 10 determined by the RNC. It would contact the White 19:04:30 11 House to determine whether the President would 19:04:32 12 participate and try to schedule the event to 19:04:37 13 coincide with the availability of the President on 19:04:40 14 his schedule. 19:04:41 15 Q. And what role did the White House play in 19:04:44 16 the organization or the details of the event? 19:04:51 17 A. None. 19:04:52 18 Q. What role did the President or the White 19 House play in who got invited to the event? 20 A. None. 21 Q. None at all? 22 A. None.</p>	<p style="text-align: center;">196</p> <p>1 Q. How frequently is there contact between 2 the RNC, anybody at the RNC, and any federal 19:05:15 3 candidate or office holder? 19:05:17 4 A. Can you expand on your question? 19:05:28 5 Q. It's a very broad question. How often 19:05:32 6 does anybody at the RNC talk to, meet with or 19:05:37 7 otherwise interact with any federal candidate or 19:05:43 8 office holder? 19:05:46 9 A. The role of the party is to deal with 19:05:52 10 federal candidates so that, you know, there will be 19:05:57 11 potential candidates that come into town that want 19:06:01 12 to have meetings and discuss issues. The RNC under 19:06:07 13 its own rules does not support any candidate in the 19:06:13 14 primary, including federal office holder candidates, 19:06:17 15 unless those members from that state, RNC members, 19:06:20 16 approve. Having said that, I mean, the question is 19:06:25 17 so broad there could be multiple reasons for the 19:06:30 18 Chairman of the RNC to contact a federal office 19 holder to, on a number of issues from legislation to 20 attending an event. It is the role of the RNC 21 Chairman to interact with federal office holders and 22 federal candidates.</p>
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<p style="text-align: center;">197</p> <p>1 Q. No I understand that. It's a more 2 targeted question. Is there daily interaction 3 between someone at the RNC and federal candidates, 4 multiple times a day, weekly? How frequent is that 5 contact? Without regard to what it's about. Just 6 how frequent is the contact? 7 A. The Political Division may be in contact 8 with campaign committees of candidates particularly 9 post primary on an ongoing basis. The Chairman may 10 be in contact with the minority leaders on a 11 particular issue and attend conference meetings. 12 It's an impossible question for me to codify because 13 the role of the RNC is to be a political arm of 14 Republicans either seeking office or in office so 15 that there is an ability to have communications on a 16 frequent basis, but whether that's every day, five 17 times a day, once a week, it would depend on the 18 circumstance. 19 Q. But it's pretty frequent? 20 A. Again, it depends on the circumstance. I 21 mean, I don't understand the nature of the question. 22 Q. Does the RNC ever inform federal office</p>	<p style="text-align: center;">199</p> <p>1 collaborative effort that everyone would be engaged 2 to their degree to make sure that those goals were 3 met. 4 Q. And is the same true of Get Out the Vote? 5 A. In the specific instances whether it's 6 candidate specific subject either limit or 7 nonallocable or if it's generic, it would be part of 8 the Victory Plan, yes. 9 Q. Does the RNC ever alter its plans based on 10 discussion with the federal candidate? 11 A. The plans are constantly altered based on 12 budget, based on competition, but it is, again, 13 depends on what particular program is. For example, 14 coordinated expenditure funds may be initially 15 allocated for a direct mail piece, and it's 16 determined that no, a better approach would be radio 17 in that particular district. That would be 18 something that would change. 19 Q. And I understand that the plans change. 20 I'm just asking do the plans ever change because a 21 federal candidate says to the RNC I would like these 22 plans to change?</p>
<p style="text-align: center;">198</p> <p>1 holders or candidates of what the RNC is intending 2 to do? 3 A. Intending to do for what? 4 Q. Intending to do strategically or in terms 5 of any sort of spending activity. 6 A. Unless it affects that particular 7 candidate, no. 8 Q. When it does affect a particular 9 candidate, does the RNC inform the candidate? 10 A. More than likely because it's usually 11 going to be engaging in a coordinated expenditure 12 subject to whatever the limits are. 13 Q. What if the RNC is going to engage in 14 voter registration activity in a particular state? 15 Would the RNC tell the federal candidates in that 16 state that the RNC is going to do that? 17 A. The RNC in developing the Victory Plan in 18 association with the state's parties in 19 collaboration with candidates there would be a goal 20 set out at each individual state as to what the 21 voter registration drive needs to be and who's 22 responsible for getting there, and it would be a</p>	<p style="text-align: center;">200</p> <p>1 A. Only if the RNC and other sister 2 committees agree that was a better use of money. 3 The ultimate decision on how to best spend the money 4 is going to be made by the entity that's spending 5 the money, in this case the RNC, and some instances 6 there is a potential conflict with members and how 7 they would want to spend it or candidates and the 8 decision that's made by the party is how to best 9 spend that money. 10 Q. Does the RNC share its voter vault 11 information with federal candidates? 12 A. Everyone buys into it, yes. 13 Q. Other than voter vault and -- scratch 14 that. How frequently is the RNC in contact with 15 state Republican parties? 16 A. It depends. 17 Q. At a high point in the election cycle how 18 frequently? 19 A. The Chairman of the state party is a 20 member of the RNC. There is constant communication 21 with members of the RNC on an ongoing basis because 22 they are, they make up the Republican National</p>



<p style="text-align: center;">201</p> <p>1 Committee.</p> <p>2 Q. In 2008 the California Republican party</p> <p>19:13:05 3 transferred over \$2.4 million to the Colorado</p> <p>19:13:10 4 Republican party and a million dollars to the Nevada</p> <p>19:13:14 5 Republican party to help the McCain campaign. Was</p> <p>19:13:18 6 the RNC involved at all in that transfer?</p> <p>19:13:20 7 A. No.</p> <p>19:13:21 8 Q. Did the RNC suggest in any way that the</p> <p>19:13:27 9 California Republican party should make either of</p> <p>19:13:30 10 those transfers?</p> <p>19:13:30 11 A. Not that I'm aware.</p> <p>19:13:32 12 Q. Has the RNC ever suggested to a state</p> <p>19:13:34 13 Republican party that it should transfer funds to</p> <p>19:13:37 14 another state Republican party to help a federal</p> <p>19:13:40 15 candidate?</p> <p>19:13:41 16 A. Not that I'm aware.</p> <p>19:13:56 17 Q. Since 2003, has a state or local</p> <p>19:14:02 18 Republican party ever asked the RNC to engage in</p> <p>19 19 issue advocacy or grass roots lobbying in particular</p> <p>20 20 state or area?</p> <p>21 21 A. My recollection is that there were such</p> <p>22 22 requests made.</p>	<p style="text-align: center;">203</p> <p>1 ballot initiative fall under the rubric of grass</p> <p>2 roots lobbying?</p> <p>19:16:00 3 A. It would be viewed, yes.</p> <p>19:16:04 4 Q. Depending on the content of the specific</p> <p>19:16:06 5 ad?</p> <p>19:16:07 6 A. Yes, depending on the content of the</p> <p>19:16:08 7 specific ad, and I'm assuming it would have to meet</p> <p>19:16:11 8 all the other criteria.</p> <p>19:16:12 9 Q. So are each of the instances that you can</p> <p>19:16:15 10 recall where a state party requested noncandidate</p> <p>19:16:26 11 advertising were they all ballot initiative related?</p> <p>19:16:29 12 A. To my recollection, yes.</p> <p>19:16:30 13 Q. Has, since 2003 has a federal candidate or</p> <p>19:16:35 14 office holder ever asked the RNC to engage in issue</p> <p>19:16:39 15 advocacy or grass roots lobbying in particular</p> <p>19:16:42 16 district or state?</p> <p>19:16:45 17 A. Not that I'm aware.</p> <p>19:16:47 18 Q. When the RNC engages in grass roots</p> <p>19 19 lobbying in a particular area or state, does it</p> <p>20 20 inform the federal candidates and office holders in</p> <p>21 21 that area that the RNC is going to do that?</p> <p>22 22 A. Not that I'm aware.</p>
<p style="text-align: center;">202</p> <p>1 Q. And who made those requests?</p> <p>2 A. It would have more than likely been the</p> <p>19:14:38 3 Chairman of the particular party.</p> <p>19:14:42 4 Q. And did the RNC agree?</p> <p>19:14:51 5 A. Not that I'm aware.</p> <p>19:14:52 6 Q. What was the issue -- did this happen once</p> <p>19:14:56 7 or more than once?</p> <p>19:14:57 8 A. My recollection is it happened very, more</p> <p>19:15:04 9 than once, but not more than a couple times.</p> <p>19:15:06 10 Q. What were the issues -- did the requests</p> <p>19:15:13 11 include requests for issue advocacy on particular</p> <p>19:15:17 12 issues or just issue advocacy in general?</p> <p>19:15:21 13 A. No. It would have been -- I'm sorry.</p> <p>19:15:23 14 This would have been more ballot referendum type</p> <p>19:15:26 15 issue. There would have been issue advocacy, but it</p> <p>19:15:29 16 would have been connection with ballot referendums,</p> <p>19:15:31 17 not necessarily affecting a legislative issue in the</p> <p>19:15:36 18 state pending before the legislature. It would be</p> <p>19 19 more pending before the electorate in a sort of a</p> <p>20 20 ballot referendum situation. I apologize. I</p> <p>21 21 mistook your question.</p> <p>22 22 Q. Would advertising for or against a state</p>	<p style="text-align: center;">204</p> <p>1 Q. Does the RNC inform the state party or the</p> <p>2 relevant local party that it's going to do these</p> <p>19:17:18 3 issue ads?</p> <p>19:17:19 4 A. More than likely the request would have</p> <p>19:17:21 5 come from the state party to get engaged or from</p> <p>19:17:26 6 some state officials to get engaged.</p> <p>19:17:30 7 Q. But I thought that you said that a state</p> <p>19:17:37 8 party, the only state requests were turned down?</p> <p>19:17:43 9 A. Right. My recollection is that the RNC</p> <p>19:17:47 10 never went ahead because of budgetary reasons and</p> <p>19:17:52 11 resources that there was a balancing act, and so</p> <p>19:17:56 12 those requests to do anything like that were, to my</p> <p>19:18:02 13 recollection, were never fulfilled.</p> <p>19:18:04 14 Q. But on the occasions where the RNC did</p> <p>19:18:07 15 engage in grass roots lobbying advertising did the</p> <p>19:18:12 16 RNC tell the state party where the advertising was</p> <p>19:18:16 17 being run that it was going to do that?</p> <p>19:18:18 18 A. I think you're misunderstanding. I don't</p> <p>19 19 think the RNC ever did it. The request came in, but</p> <p>20 20 I don't believe the RNC ever did it.</p> <p>21 21 Q. No. Earlier I believe you said that the</p> <p>22 22 RNC engaged in grass roots lobbying?</p>



FEC Exhibit 2

William C. Christiansen

2/24/2009

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1
2 UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF COLUMBIA
4 ----- X
5 REPUBLICAN NATIONAL COMMITTEE,
6 et al.,
7 Plaintiffs, Civ. No.
8 v. 08-1953(BMK,RJL,RMC)
9 FEDERAL ELECTION COMMISSION,
10 Defendant.
11 ----- X
12 750 B Street, Suite 1850
13 San Diego, California 92101
14 February 24, 2009, 9:00 a.m.

17 30(b)(6) DEPOSITION of
18 REPUBLICAN PARTY OF CALIFORNIA
19 By: WILLIAM C. CHRISTIANSEN, III.

23 lipka.com, inc.
24 (888)lipka-com
25 info@lipka.com

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21
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25

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6		Plaintiffs California
7		Republican Party and Republican
8		Party of San Diego County"
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1 WILLIAM CHRISTIANSEN,
 2 having been administered an oath, testified as follows:
 3
 4 EXAMINATION
 5 BY MR. NOTI:
 6 Q. Good morning, Mr. Christiansen.
 7 A. Good morning.
 8 Q. My name is Adav Noti. I represent the Federal
 9 Election Commission. This is Kevin Deeley, who is also
 10 with the FEC, and you are joined by your attorneys.
 11 Would you please state your full name and your
 12 business address for the record?
 13 A. William Charles Christiansen III. 1903 West
 14 Magnolia Boulevard, Burbank, California 91506.
 15 Q. Thank you. Have you ever been deposed before?
 16 A. I have not.
 17 Q. Now, I'll explain how the deposition will
 18 proceed.
 19 I am going to ask you a series of questions,
 20 and the court reporter is going to take down your
 21 responses, so it's important that you answer verbally
 22 and not with nods or gestures. Okay?
 23 A. Got it.
 24 Q. If you don't hear or understanding a question,
 25 please tell me so that I can restate it. If you answer

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1 a question, I am going to assume that you have heard and
 2 understood the question. Okay?
 3 A. Good. Thanks.
 4 Q. Since the court reporter can only take down one
 5 person's words at a time, please let me finish a
 6 question before you answer it, even if you know the
 7 answer before I am done asking it. Okay?
 8 A. Okay.
 9 Q. If you need to take a break at any time, just
 10 let me know and we'll take one. I only ask that you not
 11 take a break while a question is pending. Okay?
 12 A. Okay.
 13 Q. Is there any reason that you can't give
 14 truthful and accurate testimony today?
 15 A. No.
 16 Q. Do you have any questions for me before we
 17 begin?
 18 A. No.
 19 Q. Where do you presently work?
 20 A. At the California Republican Party.
 21 Q. Do you refer to it as the CRP?
 22 A. Yes.
 23 Q. Can we call it the CRP?
 24 A. Yes.
 25 Q. What is your title?

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1 A. Well, it was chief operating officer.
 2 Q. What do you mean by "it was"?
 3 A. No longer chief operating officer.
 4 Q. What is it now?
 5 A. Nothing.
 6 Q. When did that change?
 7 A. Friday.
 8 Q. So what is your affiliation with the CRP now?
 9 A. What do you mean by "affiliation"?
 10 Q. Let me see if I understand. You were the chief
 11 operating officer?
 12 A. Yes.
 13 Q. And you are no longer the chief operating
 14 officer?
 15 A. Correct.
 16 Q. Do you still work for the CRP?
 17 A. No.
 18 Q. Okay. And that's as of Friday --
 19 A. As of Friday.
 20 Q. Friday, February 19th?
 21 A. Yes.
 22 Q. 20th, I guess.
 23 How long were you the COO of the CRP?
 24 A. Twenty months.
 25 Q. And what were your responsibilities as COO?

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William C. Christiansen

2/24/2009

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1 A. Running the day-to-day operations of the
 2 California Republican Party, the CRP.
 3 **Q. Prior to working for the CRP, where were you**
 4 **employed?**
 5 A. At the CRP as the Victory '06 director.
 6 **Q. Was that your title, director?**
 7 A. Yes.
 8 **Q. And how long were you employed in that**
 9 **position?**
 10 A. Twelve months.
 11 **Q. What were your responsibilities as the**
 12 **director?**
 13 A. I directed the Victory program for 2006.
 14 **Q. What was the Victory program?**
 15 A. Get-out-the-vote operations.
 16 **Q. For the CRP?**
 17 A. Yes.
 18 MR. NOTI: I'd like to ask the court reporter
 19 to mark this document as Exhibit A.
 20 (Exhibit A was marked for
 21 identification.)
 22 BY MR. NOTI:
 23 **Q. This is a document labeled "Defendant Federal**
 24 **Election Commission's Notice of Deposition to Plaintiff**
 25 **California Republican Party."**

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1 have shown you, did you review or prepare any documents
 2 for the deposition?
 3 A. No.
 4 **Q. You can put the document aside.**
 5 **Would you please explain the organizational**
 6 **structure of the CRP starting at the top?**
 7 A. Defining which part of the structure?
 8 **Q. Whatever, starting with whatever --**
 9 **(Interruption)**
 10 **(Discussion off the record)**
 11 BY MR. NOTI:
 12 **Q. Starting with top leadership, whatever that may**
 13 **be, of the CRP.**
 14 A. Could you define the leadership part which --
 15 **Q. Let's start with the State Central Committee.**
 16 A. The State Central Committee is approximately
 17 1400 appointed delegates that comprise the California
 18 Republican Party Central Committee.
 19 MR. NOTI: I'd like to ask the court reporter
 20 to mark this as Exhibit B.
 21 (Exhibit B was marked for
 22 identification.)
 23 BY MR. NOTI:
 24 **Q. Are you familiar with this document?**
 25 A. Yes, I am.

10

Page 10

1 **Are you familiar with this document?**
 2 A. Yes.
 3 **Q. Are you aware that you are here today as the**
 4 **organizational designee of the CRP to answer questions**
 5 **about the topics listed on the last two pages of the**
 6 **document?**
 7 A. Yes.
 8 **Q. Okay. And even though you are no longer with**
 9 **the CRP, you are still the CRP's designee?**
 10 A. Correct.
 11 MR. NOTI: And to be clear, the CRP's counsel,
 12 you are okay with having someone who is not employed by
 13 the CRP be the designee?
 14 MR. BOPP: He is the designee.
 15 MR. NOTI: Okay.
 16 BY MR. NOTI:
 17 **Q. Did you have any meetings to prepare for**
 18 **today's deposition?**
 19 A. Yes.
 20 **Q. With whom did you meet?**
 21 A. With counsel.
 22 **Q. Other than with counsel, did you talk to**
 23 **anybody else about this deposition?**
 24 A. No.
 25 **Q. Other than documents that your lawyers might**

9

Page 12

1 **Q. It's labeled "Standing Rules and Bylaws of the**
 2 **California Republican Party as Amended 28 September**
 3 **2008."**
 4 **Is this version the most current version of the**
 5 **bylaws?**
 6 A. No, it is not.
 7 **Q. What is the more recent version? Do you know**
 8 **when it's dated?**
 9 A. It would be Sunday, the 22nd of February.
 10 **Q. So two days ago?**
 11 A. Yes.
 12 **Q. Do you know what was amended in the most recent**
 13 **version?**
 14 A. No, I am not clear.
 15 **Q. Could you please explain the relationship**
 16 **between the State Central Committee of the CRP, the**
 17 **executive committee and the board of directors?**
 18 A. With -- I'm sorry. Could you make that more
 19 specific?
 20 **Q. What are the relative relationships between**
 21 **those three bodies?**
 22 A. Those are the -- the leadership structure of
 23 the CRP.
 24 **Q. Which is at the top of the leadership**
 25 **structure?**

11

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1 A. The board of directors.
 2 **Q. And how does the executive committee relate to**
 3 **the board of directors?**
 4 A. It is -- it is secondary to the board of
 5 directors for the leadership role.
 6 **Q. And the State Central Committee, how does that**
 7 **relate to the board of directors?**
 8 A. The board of directors is elected from members
 9 of the State Central Committee.
 10 **Q. If I could direct your attention to Page 33 of**
 11 **the document, Section 2.06.01. This section lists 12**
 12 **committees of the State Central Committee, correct?**
 13 A. Yes.
 14 **Q. Are these the only committees of the State**
 15 **Central Committee?**
 16 A. Yes.
 17 **Q. If you could turn to Page 39, the paragraph**
 18 **labeled "Congressional Target Committee." The first**
 19 **question is, is there any reason that this committee**
 20 **isn't listed on Page 33?**
 21 A. It is non-functional.
 22 **Q. When did it become non-functional?**
 23 A. I do not know.
 24 **Q. Do you know who decided to make it**
 25 **non-functional?**

12

Page 15

1 A. Yes.
 2 **Q. What are the National Committee members'**
 3 **responsibilities?**
 4 A. Representing the State Central Committee to the
 5 Republican National Committee.
 6 **Q. And how do they do that?**
 7 A. How? Could you define -- I'm not -- clarify
 8 that, what --
 9 **Q. What do they do to represent the CRP to the**
 10 **RNC?**
 11 A. They attend RNC meetings.
 12 **Q. Do they report to the RNC about the CRP?**
 13 A. Yes.
 14 **Q. What do they report?**
 15 A. Functions.
 16 **Q. Such as what?**
 17 A. Functions as events and election results.
 18 **Q. How do they make those reports to the RNC?**
 19 A. You mean what do you mean by "how"?
 20 **Q. In what format? Do they speak? Do they write**
 21 **reports?**
 22 A. Verbally.
 23 **Q. And when do they make those verbal reports?**
 24 A. At the January RNC meeting.
 25 **Q. Is that a formal process?**

14

Page 14

1 A. I don't know.
 2 **Q. Was it ever functional during your time as COO?**
 3 A. No.
 4 **Q. Can you tell us who is still with the CRP who**
 5 **would know when this committee was rendered**
 6 **non-functional?**
 7 A. No. Actually, I don't.
 8 **Q. Were the responsibilities of this committee**
 9 **transferred to a different committee?**
 10 A. No.
 11 **Q. Who are the CRP's National Committee members?**
 12 A. Sean Steel is the national committee man and
 13 Linda Ackerman is the National Committee woman.
 14 **Q. Aren't there three National Committee members?**
 15 A. No.
 16 **Q. I was under the impression that each state had**
 17 **three members on the RNC; is that correct?**
 18 A. Yes. The chairman's the third member.
 19 **Q. Are the National Committee members elected?**
 20 A. Yes.
 21 **Q. Who elects them?**
 22 A. The Central Committee.
 23 **Q. And how long are their terms?**
 24 A. Four years.
 25 **Q. Are they elected at the same time?**

13

Page 16

1 A. No.
 2 **Q. Is there ever a written -- is there ever**
 3 **anything in writing that accompanies those verbal**
 4 **reports?**
 5 A. Not that I have seen.
 6 **Q. Do the National Committee members report back**
 7 **to the CRP about RNC activities?**
 8 A. Yes.
 9 **Q. When do they do that?**
 10 A. Various meetings.
 11 **Q. Is there any formal process for them to report**
 12 **back about the RNC's activities?**
 13 A. No.
 14 **Q. When the committee members do report back, what**
 15 **types of things do they report?**
 16 A. Activities, RNC activities.
 17 **Q. Such as what?**
 18 A. Meaning -- I mean, whatever the RNC is up to at
 19 the time.
 20 **Q. Can you give an example of what they might**
 21 **report?**
 22 A. The results of the recent RNC elections.
 23 **Q. Okay. What about external activities, things**
 24 **that aren't just internal RNC business? Do the**
 25 **committee members report on those?**

15

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1 A. External as in?

2 **Q. Anything that's not a purely internal matter,**

3 **like an officer election.**

4 A. No.

5 **Q. The committee members don't report back about**

6 **what the RNC is doing in terms of actual election work?**

7 A. Meaning "election work" as in -- what would you

8 mean by that?

9 **Q. Anything related to an election.**

10 A. A specific election?

11 **Q. Sure.**

12 A. They report back on RNC activities as they know

13 it.

14 **Q. What types of activities would they report on**

15 **other than RNC officer elections?**

16 A. RNC activities. Nothing defined, mostly what

17 they find at the RNC meetings that they have been

18 reported on.

19 **Q. Can you give an example?**

20 A. Let's see. No. You know, I did not hear the

21 RNC committee members' report at the state convention,

22 so actually I do not know.

23 **Q. What about the last state convention?**

24 A. The last state convention, the previous RNC

25 committee men gave a going away speech.

16

Page 19

1 A. Yes.

2 **Q. Do you know what the current chairman's**

3 **employment is?**

4 A. With the Hardage Group.

5 **Q. How do you spell that?**

6 A. H-A-R-D-A-G-E.

7 **Q. And what is that?**

8 A. I don't know.

9 **Q. During your tenure as COO, did you report to**

10 **the chairman?**

11 A. Yes.

12 **Q. Did the chairman make decisions about**

13 **activities that you were responsible for conducting?**

14 A. Meaning activities -- like define "activities."

15 **Q. I believe you said something to the effect that**

16 **as COO you were responsible for day-to-day operations of**

17 **the CRP.**

18 A. Yes.

19 **Q. Did you report to the chairman on those**

20 **day-to-day operations?**

21 A. No.

22 **Q. So other than being the official spokesperson**

23 **for the CRP, does the chairman have any other**

24 **responsibilities?**

25 A. He conducts the meetings of the California

18

Page 18

1 **Q. At any -- strike that.**

2 **So the National Committee members speak at each**

3 **CRP convention?**

4 A. Yes.

5 **Q. Who are the CRP's officers?**

6 A. Presently?

7 **Q. Yes.**

8 A. The chairman is Ron Nehring, the vice-chairman

9 is Tom Del Becarro, the secretary is Steve Baric, the

10 treasurer is Keith Carlson, and officially those are the

11 main officers of the CRP.

12 **Q. And that did not change in the convention this**

13 **past weekend, correct?**

14 A. No.

15 **Q. Correct?**

16 A. Correct, it did not change.

17 **Q. Thank you. What are the chairman's**

18 **responsibilities?**

19 A. He is the official spokesman of the California

20 Republican Party.

21 **Q. Does he have any operational responsibilities?**

22 A. I do not know.

23 **Q. Is the chairmanship a full-time position?**

24 A. It's a volunteer position.

25 **Q. So is the chairman otherwise employed?**

17

Page 20

1 Republican Party.

2 **Q. Does the chairman have any other**

3 **responsibilities besides being the spokesman and**

4 **conducting the meetings?**

5 A. I do not know.

6 **Q. What are the vice-chairman's responsibilities?**

7 A. He -- officially the vice-chairman is available

8 in case there is a vacancy in the chairman's position.

9 **Q. Is that the vice-chairman's only role?**

10 A. Officially.

11 **Q. What are his unofficial responsibilities?**

12 A. It depends on the vice-chairman.

13 **Q. What does the current vice-chairman do?**

14 A. He's in charge of the Volunteer Committee.

15 **Q. Is that what's listed in the bylaws as the**

16 **Volunteer Organization Committee?**

17 A. Right. Yes.

18 **Q. Is that the only thing the vice-chairman, the**

19 **current vice-chairman does?**

20 A. Yes.

21 **Q. What are the secretary's responsibilities?**

22 A. Recording the minutes of the board meetings and

23 the CRP State Central Committee meetings.

24 **Q. Does the secretary personally record those**

25 **things?**

19

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1 Q. How would reviewing your campaign reports help
 2 answer the question?
 3 A. That I don't know. It would have to be defined
 4 more.
 5 Q. Well, you said that reviewing campaign reports
 6 would help you answer it. How would it help you answer
 7 the question?
 8 A. I don't know.
 9 Q. Then why did you say that reviewing campaign
 10 reports would help you answer the question?
 11 A. It would depend on the fundraiser and if it's
 12 state or federal dollars involved.
 13 MR. BOPP: Can we take a break for a second?
 14 MR. NOTI: Yes, sure.
 15 (Recess)
 16 BY MR. NOTI:
 17 Q. So the previous question was, I believe,
 18 whether any federal candidate or officeholder has
 19 solicited donations to the CRP.
 20 A. Yes.
 21 Q. Do you understand the question?
 22 A. I do.
 23 Q. Okay. Has that happened since 2003?
 24 A. Yes.
 25 Q. Okay. How often has it happened?
 52

Page 55

1 Q. All of the, roughly, five that you said
 2 occurred in 2008.
 3 A. With McCain and Palin, yes.
 4 Q. Thank you. And the joint fundraising committee
 5 was a committee of which entities?
 6 A. The RNC and the CRP.
 7 Q. What about the McCain campaign?
 8 A. Yes, and the McCain campaign.
 9 Q. Was anybody else part of the joint fundraising
 10 committee?
 11 A. No.
 12 Q. And as for the -- the people who attended --
 13 well, how much did the tickets cost?
 14 A. It varied.
 15 Q. When was the first of these fundraisers, do you
 16 know?
 17 A. Yes. Roughly, my memory is June 2008.
 18 Q. And how much were tickets to that fundraiser?
 19 A. A thousand dollars for a reception and
 20 significantly higher for dinner, and I don't remember
 21 the exact amount.
 22 Q. And who was invited to that fundraiser?
 23 A. There were roughly a thousand people there.
 24 Q. How did the CRP decide who to invite?
 25 A. Various lists, in-house lists.
 54

Page 54

1 A. It varies, depending on the year.
 2 Q. Starting -- let's start with 2008. How often
 3 did a federal candidate or officeholder solicit
 4 donations to the CRP in 2008?
 5 A. I would say at least five times.
 6 Q. Which federal candidate or officeholder?
 7 A. John McCain, Sarah Palin.
 8 Q. In what format did they make that solicitation?
 9 Phone, in person?
 10 A. Fundraisers in person.
 11 Q. And all, roughly, five times was in person by
 12 either John McCain or Sarah Palin or both?
 13 A. Yes.
 14 Q. And who was at those fundraisers?
 15 A. It varied on the level of the fundraiser.
 16 Q. When you refer to "level," are you referring to
 17 the level of the Golden State Leadership Team donor
 18 levels?
 19 A. I refer to donor levels.
 20 Q. Okay. We'll come back to that.
 21 Were those fundraisers part of any joint
 22 fundraising committee?
 23 A. Yes.
 24 Q. All of them?
 25 A. Define "all."
 53

Page 56

1 Q. Are those lists of previous donors?
 2 A. Yes.
 3 Q. Were higher level donors -- was this fundraiser
 4 geared towards higher level donors?
 5 A. It was between a thousand dollars and, I'm
 6 sorry, I don't recall the highest amount.
 7 Q. Did the CRP make any effort to particularly
 8 solicit folks who had given a lot of money in the past?
 9 A. It was both.
 10 Q. Both people who had given a lot and people who
 11 hadn't?
 12 A. Yes.
 13 Q. Okay. What about corporations? Were they
 14 invited to this fundraiser?
 15 A. I believe this one was -- I can't remember how
 16 the -- I apologize. I don't remember how the -- it was
 17 set up directly, but I don't think they were allowed to
 18 per federal election law.
 19 Q. After June 2008, when was the next fundraising
 20 event where a federal candidate or officeholder
 21 solicited funds?
 22 A. All five events were between June and October
 23 and the end of October.
 24 Q. Okay. So for the second one, how much were
 25 tickets?
 55

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1 A. Roughly comparable to the first.
 2 **Q. Is that the case for all five of them?**
 3 A. Yes.
 4 **Q. And for the second one, how did the CRP decide**
 5 **who to invite?**
 6 A. It varied upon the region as well.
 7 **Q. So they were held in different locations?**
 8 A. Yes.
 9 **Q. And the CRP made an effort to invite folks who**
 10 **were closer to those locations?**
 11 A. Exactly.
 12 **Q. Okay. Other than kind of prior donor status**
 13 **and locations, were there any other factors that played**
 14 **into who was invited to the fundraiser?**
 15 A. No.
 16 **Q. When you mentioned -- for the June event you**
 17 **mentioned, I think, roughly a thousand people attended**
 18 **the event?**
 19 A. Yes.
 20 **Q. How many people attended the reception that**
 21 **cost more?**
 22 A. The reception cost less.
 23 **Q. I apologize. The dinner that cost more.**
 24 A. I was not in the dinner. It was approximately
 25 200 people.

56

Page 59

1 A. Yes.
 2 **Q. How did the candidate know who had given more?**
 3 A. The only way they would know is by the room
 4 they were in.
 5 **Q. Was it physically organized so that people who**
 6 **had given more were identifiable to the candidate?**
 7 A. Yes. They were eating dinner in a separate
 8 room from the reception.
 9 **Q. Ah. So when the candidate walked into the**
 10 **room, they knew -- excuse me, for dinner they knew that**
 11 **those were the people who had paid the higher amount for**
 12 **their ticket?**
 13 A. I can only assume.
 14 **Q. And at the dinner, the candidate spoke with --**
 15 **did the candidates speak with the attendees?**
 16 A. Yes. Depending on how much time they had.
 17 **Q. Understood. Did the chairman of the RNC attend**
 18 **any of those events?**
 19 A. I don't think so.
 20 **Q. Okay. Let's go back to 2007. Did any federal**
 21 **candidate or officeholder solicit fund -- excuse me,**
 22 **solicit donations to the CRP in 2007?**
 23 A. No.
 24 **Q. What about in 2006?**
 25 A. I'm going to say yes, but I don't remember a

58

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1 **Q. So roughly, roughly, one-fifth of the number of**
 2 **people who were at the cheaper event?**
 3 A. Roughly.
 4 **Q. Is that proportion -- was that proportion**
 5 **roughly the same for each of these five events?**
 6 A. Yes.
 7 **Q. And did each of them have a less-expensive**
 8 **ticket and a more-expensive-ticket option?**
 9 A. Yes.
 10 **Q. Okay. Did Senator McCain or Governor Palin**
 11 **speak at these events?**
 12 A. Yes.
 13 **Q. At all five?**
 14 A. No.
 15 **Q. How many of the five did they speak at, one of**
 16 **them speak at?**
 17 A. At least four of them. There was one event
 18 where neither one could make it.
 19 **Q. Okay. Did they meet with the attendees?**
 20 A. Depending on the level, yes.
 21 **Q. Okay. How did the level of the attendee affect**
 22 **whether the candidate met with them?**
 23 A. The number of people in the room.
 24 **Q. Did people who gave more have a greater chance**
 25 **to meet with the candidate?**

57

Page 60

1 specific circumstance.
 2 **Q. Which -- generally which federal candidate or**
 3 **officeholder do you think?**
 4 A. President George Bush.
 5 **Q. Okay. Is that an in-person fundraiser?**
 6 A. No.
 7 **Q. How did the President solicit for the CRP?**
 8 A. Wait. I'm sorry. Let me rephrase that. Yes.
 9 **Q. Are we talking about one particular occurrence**
 10 **in 2006?**
 11 A. That I remember.
 12 **Q. Okay. Could there have been others that you**
 13 **don't remember?**
 14 A. Yes.
 15 **Q. You understand that you are here to provide**
 16 **information about conduct from 2003 forward, correct?**
 17 A. Yes.
 18 **Q. Okay. Did you take steps to learn what had**
 19 **occurred prior to your -- prior to your becoming the COO**
 20 **of the CRP?**
 21 A. Yes.
 22 **Q. Okay. So starting with the -- what you**
 23 **specifically recall from 2006, how did the President**
 24 **solicit donations to the CRP?**
 25 A. Through an out-of-state fundraiser.

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1 **Q. Okay. Where was that fundraiser?**
 2 A. I believe Colorado.
 3 **Q. And was that some form of joint fundraising**
 4 **event?**
 5 A. I don't think so.
 6 **Q. It was purely a CRP event?**
 7 A. I think so.
 8 **Q. Were tickets sold for that event?**
 9 A. Yes.
 10 **Q. Do you remember how much they cost?**
 11 A. No.
 12 **Q. Were there different tiers of ticket levels?**
 13 A. I don't know.
 14 **Q. Did the President speak with -- did the**
 15 **President speak at the event?**
 16 A. Yes.
 17 **Q. Did the President meet with or speak with**
 18 **individual attendees?**
 19 A. I don't know.
 20 **Q. Was there a dinner involved?**
 21 A. Yes.
 22 **Q. Did the President attend the dinner?**
 23 A. Yes -- attend, yes, not necessarily stayed.
 24 **Q. Okay. Besides that event, were there other**
 25 **occasions in 2006 where federal candidates or**
 60

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1 **Q. Do you --**
 2 A. But no dessert. I'm sorry.
 3 **Q. Do you recall or do you know how much any of**
 4 **those tiers were?**
 5 A. No, I do not.
 6 **Q. What about 2003? Did any federal candidate or**
 7 **officeholder solicit funds for the CRP?**
 8 A. Yes.
 9 **Q. Which candidate or officeholders?**
 10 A. President Bush.
 11 **Q. I'm sorry. Just to go back to 2004 for a**
 12 **second. Were there any other occasions, other than the**
 13 **two to five fundraisers with the President and the**
 14 **Vice-President, where federal candidates or**
 15 **officeholders solicited for the CRP?**
 16 A. I do not know.
 17 MR. NOTI: Just for the record, we are going to
 18 need somebody who knows that information.
 19 MR. BOPP: Well, could we go off the record for
 20 a second?
 21 MR. NOTI: Yes.
 22 (Discussion off the record)
 23 MR. NOTI: Back on the record.
 24 BY MR. NOTI:
 25 **Q. You mentioned a solicitation for the CRP in**
 62

Page 62

1 **officeholders solicited donations to the CRP?**
 2 A. No.
 3 **Q. What about in 2005?**
 4 A. 2005, I don't know.
 5 **Q. What about in 2004?**
 6 A. Yes.
 7 **Q. Which candidate or officeholder?**
 8 A. President Bush and Vice-President Cheney.
 9 **Q. How many -- on how many occasions did they**
 10 **solicit for the CRP?**
 11 A. I would say more than two, less than five.
 12 **Q. Were these all in-person fundraisers?**
 13 A. Yes.
 14 **Q. And were tickets sold to those events?**
 15 A. Yes.
 16 **Q. Were there different tiers of tickets?**
 17 A. Yes.
 18 **Q. What was the distinction between the different**
 19 **tiers?**
 20 A. Reception, dinner and photograph availability.
 21 **Q. Were those three tiers or two tiers?**
 22 A. It would be three.
 23 **Q. Which was the most expensive, the dinner or the**
 24 **photograph?**
 25 A. Dinner with photograph.
 61

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1 **2003 by President Bush, correct?**
 2 A. Let me -- I apologize. Since I was involved in
 3 the early part of the campaign, I can say that President
 4 Bush did an event that year in California, and I don't
 5 have firsthand knowledge of the fundraiser. I don't
 6 know if it was a fundraising event. I should say that.
 7 I know he did a rally, but I don't know if there was a
 8 fundraiser involved.
 9 **Q. When did you join the CRP?**
 10 A. In various positions for 20 years. I was COO
 11 from 2007 till this year. I was the Victory director
 12 from -- in '05 to '06, and then before that I was
 13 involved as the executive director in Arizona for the
 14 Republican Party, and before that I was the county
 15 executive director for Orange County. So they are all
 16 interconnected, so I would just know different levels of
 17 where I was at at the time.
 18 **Q. The state of Arizona?**
 19 A. Yes.
 20 **Q. Other than the events we have discussed, when**
 21 **else, since 2003, has a federal candidate or**
 22 **officeholder solicited donations to the CRP?**
 23 A. I don't know specifically.
 24 **Q. Do you know generally?**
 25 A. Generally, I believe I -- I believe I have seen
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1 A. No.
 2 **Q. What about state candidates?**
 3 A. No.
 4 **Q. Just so that I am clear, when I talk about**
 5 **federal candidates and federal officeholders, I am not**
 6 **talking about the individual candidate themselves. I am**
 7 **just talking about their campaign or their chief of**
 8 **staff, people working on their behalf.**
 9 A. Correct. Okay.
 10 **Q. Other than the people who already have access**
 11 **to your donor records, does anybody ever request access?**
 12 A. People do request access.
 13 **Q. Who has requested access?**
 14 A. Campaigns that don't understand that we don't
 15 do it.
 16 **Q. So since 2003, anytime someone has requested**
 17 **access it's been denied?**
 18 A. Yes.
 19 **Q. Okay. Have there been any exceptions?**
 20 A. The only caveat to that would be that
 21 occasionally we allow a county party to use our direct
 22 mail house list to send a solicitation on their own
 23 behalf.
 24 **Q. Do you send the direct mail house list to the**
 25 **state party -- I'm sorry, to the local party?**

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Page 83

1 **Q. What type of specific donation information**
 2 **would be included in those reports?**
 3 A. Specifically only if a large, generous donor
 4 had given to the party, we'd let the board know.
 5 **Q. Would the board be informed of the identity of**
 6 **the donor?**
 7 A. Yes.
 8 **Q. And what about the amount of the donation?**
 9 A. Sometimes.
 10 **Q. Is the board informed in writing or orally or**
 11 **both?**
 12 A. It varies. Both.
 13 **Q. Who is responsible for informing the board of**
 14 **those donations?**
 15 A. No one person, but generally it's the COO and
 16 the treasurer.
 17 **Q. And does that report happen at each board**
 18 **meeting?**
 19 A. If they were big donations.
 20 **Q. For these purposes, what would count as a big**
 21 **donation?**
 22 A. It depends on the year. It depends on how much
 23 money is already in the bank accounts. Example, the
 24 state convention we had a number of sponsors of the
 25 state convention of which the board was made aware of.

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Page 82

1 A. No.
 2 **Q. How do they get access to it?**
 3 A. They have to contract with our same vendor.
 4 **Q. Who then shares the information with them?**
 5 A. No. The vendor will mail to the list from that
 6 county. That county does not get direct access to it.
 7 **Q. So the San Diego County would say to the**
 8 **vendor, we'll pay you X dollars to send to the CRP's**
 9 **donors in San Diego, that kind of thing?**
 10 A. Correct.
 11 **Q. What about other state Republican parties? Do**
 12 **they ever?**
 13 A. No.
 14 **Q. Does the CRP prepare summaries or reports,**
 15 **other than government filings, summaries or reports of**
 16 **its donations?**
 17 A. Yes.
 18 **Q. What summaries or reports are prepared?**
 19 A. Usually we have a -- we prepare a budget versus
 20 actuals and a summary treasurer's report for every board
 21 meeting.
 22 **Q. Now, does aggregate -- does it include**
 23 **aggregate donor information or specific donations or**
 24 **both?**
 25 A. Both.

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Page 84

1 **Q. Okay. Other than informing the board of**
 2 **particular large donations, are there other -- is**
 3 **individual donation information ever distributed?**
 4 A. No.
 5 **Q. Does anybody other than the board ever request**
 6 **a report or a summary of donation information?**
 7 A. No.
 8 **Q. Has a federal candidate ever asked for donation**
 9 **information from the CRP?**
 10 A. No.
 11 **Q. What about a federal officeholder?**
 12 A. No.
 13 **Q. Does the CRP ever provide anything to a donor**
 14 **in exchange for a specific donation?**
 15 A. Yes.
 16 **Q. What does the CRP provide?**
 17 A. It depends on the membership level.
 18 MR. NOTI: I'd like to ask the court reporter
 19 to mark this as Exhibit C.
 20 (Exhibit C was marked for
 21 identification.)
 22 BY MR. NOTI:
 23 **Q. This is a document entitled "Golden State**
 24 **Leadership Team." It's a Web printout.**
 25 **Are you familiar with this document?**

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Page 86

1 A. Yes.

2 **Q. Is this what you were referring to when you**

3 **mentioned the level of the donation?**

4 A. Absolutely.

5 **Q. Okay. If I could direct your attention to the**

6 **left column which mentions the Golden State Leadership**

7 **Team. What is the Golden State Leadership Team?**

8 A. It's just a designation of donor levels. Each

9 of these four levels is the team, is the Golden State

10 Leadership Team, and then within the team are the

11 different -- depending on the size of the donation, is

12 the benefit level.

13 **Q. So the Golden State Leadership Team is**

14 **comprised of the people who meet at least one of these**

15 **levels?**

16 A. Yes.

17 **Q. What does the Golden State Leadership Team do?**

18 A. Nothing.

19 **Q. It's an honorary designation?**

20 A. Yes.

21 **Q. Is there any way to get on it other than by**

22 **donating a thousand or more dollars to the CRP?**

23 A. It's subjective, but, no, we have not done

24 that.

25 **Q. The second paragraph in the left column says,**

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1 **"Members of the Team work closely with California's**

2 **Republican candidates and officials, sharing information**

3 **on today's important issues, and keeping Team members**

4 **informed on the Republican campaign every step of the**

5 **way."**

6 **Do you see where I am reading?**

7 A. Yes.

8 **Q. What candidates and officials is that referring**

9 **to?**

10 A. It depends on who we can strong-arm to be on

11 our conference calls.

12 **Q. We'll come back to the conference calls in a**

13 **second.**

14 **Does it ever include federal candidates or**

15 **officeholders?**

16 A. Yes.

17 **Q. Other than conference calls -- excuse me.**

18 **Strike that.**

19 **When the document refers to sharing**

20 **information, what information is shared?**

21 A. It depends on the conference call, but it's

22 usually just general information regarding issues going

23 on either at the state or federal level, depending on

24 the participant.

25 **Q. Is that information shared in any way other**

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1 **than through the conference calls?**

2 A. No, not to date.

3 **Q. Are these the quarterly conference calls that**

4 **you are referring to?**

5 A. It says in here they are quarterly, but we

6 generally have a couple a year. There is no designated

7 timeframe.

8 **Q. The next sentence -- I'm sorry. I need to go**

9 **back to something I forgot to ask you earlier. I'm**

10 **sorry. This is about incoming donations.**

11 **Does the CRP treat all individual donations up**

12 **to the \$5,000 limit as federal contributions?**

13 A. If -- if it's legally allowable, yes.

14 **Q. In other words, if it's from an individual, not**

15 **a corporation?**

16 A. Correct.

17 **Q. There is no -- you don't -- the CRP doesn't ask**

18 **people to designate whether the money they are giving is**

19 **federal or state?**

20 A. No.

21 **Q. Coming back to the document, the next sentence**

22 **reads: "It's a close relationship where members of the**

23 **Team are well recognized for their important support of**

24 **the Republican campaign."**

25 **What support is this referring to?**

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1 A. Monetary.

2 **Q. How were the members of the team, quote, "well**

3 **recognized," close quote?**

4 A. We -- we give them the benefit levels that are

5 generally here on these -- in these four different

6 levels.

7 **Q. Does the recognition refer to anything other**

8 **than these four levels?**

9 A. No.

10 **Q. Looking at the right-hand column, which lists**

11 **the four membership levels and the benefits for each, as**

12 **a general matter, why does the CRP have these membership**

13 **levels?**

14 A. To preferably have an entrance-level donor and

15 bump them up over the course of years.

16 **Q. Does having these levels help the CRP's**

17 **fundraising?**

18 A. Yes.

19 **Q. How does it help the fundraising?**

20 A. It allows us to solicit a different level of

21 donors and still allow them to have benefits.

22 **Q. Do the levels provide incentives for people to**

23 **give more?**

24 A. I'm sorry. What -- define that.

25 **Q. Does establishing these levels help the CRP**

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1 take in more donations than it would take in without
 2 these levels?
 3 A. I don't know that specifically. It's our
 4 theory.
 5 Q. So has the CRP ever tried to quantify the
 6 effect of having these levels?
 7 A. No.
 8 Q. Okay. Under "Chairman's Council," the second
 9 bullet point refers to a quarterly CRP update conference
 10 call. Understanding that's not necessarily quarterly,
 11 is that the conference call you were referring to
 12 earlier?
 13 A. Yes.
 14 Q. What happens on those? Would you just
 15 generally describe those calls.
 16 A. Sure. The chairman gives an update on the
 17 state party, and whatever guest is on the phone at that
 18 time will give him an update as to whatever that guest
 19 is particularly working on at that point in time.
 20 Q. Is there only one guest, or could there be
 21 more?
 22 A. It depends on the call. There could be more
 23 if -- if -- possibly.
 24 Q. Who schedules the calls?
 25 A. Either the chairman or the director of the

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1 A. The chairman usually gives an update as to
 2 state party activities and then introduces the guest.
 3 Q. And then does the guest speak?
 4 A. Yes.
 5 Q. What types of state party activities does the
 6 chairman discuss?
 7 A. Usually, if there is -- if it's a campaign
 8 year, campaign events that are upcoming, abilities to
 9 get involved, or if it's a state party convention,
 10 et cetera, description.
 11 Q. And what does the guest discuss, the guest
 12 speaker?
 13 A. It depends on the guest.
 14 Q. How often is the guest a federal candidate or
 15 officeholder?
 16 A. It would depend on the election year.
 17 Q. In 2008, how often was it a federal candidate
 18 or officeholder?
 19 A. I think we had three calls or less, and one of
 20 them was McCain's campaign manager.
 21 Q. Were the other two non-federal?
 22 A. I don't remember. They were -- one was a
 23 campaign manager and another one was our state
 24 Republican assembly leader, and a third was -- I don't
 25 recall. It was not federal, though.

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1 Golden State Leadership Team.
 2 Q. How is the director of the leadership team
 3 chosen?
 4 A. It's a hired position. It's a paid position
 5 for the CRP.
 6 Q. So is it given to one of the donors?
 7 A. No, no. It's an employee of the CRP in the
 8 finance department.
 9 Q. Who decides who is going to be on the call?
 10 A. The director of the Golden State Leadership
 11 Team has a list, and she sends the list to the members
 12 of these different four levels.
 13 Q. And what about the other folks who are on the
 14 call, not the donors, but the Republican party leaders
 15 or officials? Who decides which of them is going to be
 16 on the call?
 17 A. Generally the chairman.
 18 Q. What information do the donors get in advance
 19 about who's going to be on the call?
 20 A. They usually get an e-mail telling them what
 21 the call-in access code is and who the guest will be.
 22 Q. And you said that's by e-mail?
 23 A. Yes.
 24 Q. So how does the call start once everybody's
 25 dialed in?

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1 Q. Does the CRP still have the e-mails that were
 2 sent out to the donors about the calls?
 3 A. Probably.
 4 Q. How long had these calls been going on?
 5 A. Approximately one year.
 6 Q. Did any of them happen prior to 2008?
 7 A. No. This is -- I'm sorry. This is a -- this
 8 is a -- it was a new revamped program a year ago, so
 9 these are all new benefits.
 10 Q. Is there a document similar to this one that
 11 reflects the benefits, what the benefits were before
 12 these were the benefits?
 13 A. Yes.
 14 Q. Were they substantially -- strike that.
 15 Do you know what the differences were?
 16 A. Most of them.
 17 Q. You mean, most of these things are new?
 18 A. No, I'm sorry. Most -- most of them are the
 19 same.
 20 Q. Okay. Is there anything that used to be a
 21 benefit that's not on here?
 22 A. No, not that I am aware of.
 23 Q. Okay. Who was the McCain campaign manager who
 24 spoke on the 2008 call?
 25 A. I believe his name's -- was it Christian Ferry?

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1 Was that -- I believe, yes.
 2 **Q. F-E --**
 3 A. I think it's F-E-R-R-Y.
 4 **Q. And what did he discuss?**
 5 A. The McCain get-out-the-vote efforts and the
 6 importance of California.
 7 **Q. When was this call, do you know?**
 8 A. Approximately -- I can't remember if it was
 9 before or after the RNC convention. I think it was in
 10 August.
 11 **Q. What GOTV efforts was he talking about?**
 12 A. The Victory efforts in California, voter
 13 contact.
 14 **Q. We'll come back to that.**
 15 **What did you or did he mean by the importance**
 16 **of California?**
 17 A. He was trying to tell our donors that the
 18 McCain campaign wouldn't give up on California.
 19 **Q. Wouldn't give up on winning California?**
 20 A. Right, correct.
 21 **Q. Was there an opportunity for the donors on the**
 22 **call to speak?**
 23 A. Yes.
 24 **Q. Did any of them speak?**
 25 A. There were a couple of random questions asked,
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1 **Just to clarify, are all three of those things**
 2 **convention related?**
 3 A. Yes, correct.
 4 **Q. How often are the conventions?**
 5 A. Twice yearly.
 6 **Q. And do federal candidates or officeholders**
 7 **attend them?**
 8 A. Yes.
 9 **Q. What do the federal candidates who attend do at**
 10 **the convention?**
 11 A. It depends on the convention. This past
 12 weekend we had Congressman Darrell Issa speak to one of
 13 the meal functions.
 14 **Q. Did Congressman McClintock?**
 15 A. Yes, Congressman McClintock also spoke at one
 16 of our dinners, either Friday or Saturday.
 17 **Q. Did any other federal candidates or**
 18 **officeholders attend?**
 19 A. Chuck DeVore is running for U.S. Senate. He
 20 spoke to our general session.
 21 **Q. And what about, asking generally, not just**
 22 **about this past one, what about out-of-state federal**
 23 **candidates or officeholders? Do they attend?**
 24 A. Sometimes, yes. We had this one out of state,
 25 so we had a governor of South Carolina, but that wasn't
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1 if I recall.
 2 **Q. Okay. In general, on these calls, do the**
 3 **donors have an opportunity to speak?**
 4 A. Yes.
 5 **Q. Is that a question and answer?**
 6 A. Yes.
 7 **Q. And does the CRP intend to keep having these**
 8 **calls?**
 9 A. Yes.
 10 **Q. Okay. The next bullet point on the document**
 11 **refers to regional CRP campaign briefings. Could you**
 12 **describe those briefings, please.**
 13 A. We haven't had any.
 14 **Q. Does the CRP intend to have any?**
 15 A. The chairman intends to have them, but we have
 16 not organized any to date.
 17 **Q. Is the plan for candidates or officeholders to**
 18 **attend?**
 19 A. Yeah. The general plan.
 20 **Q. Federal and state candidates and officeholders?**
 21 A. I do not know.
 22 **Q. And you said none of these have happened yet?**
 23 A. Correct.
 24 **Q. The next bullet point refers to CRP convention,**
 25 **meal functions, VIP receptions, and fundraising events.**
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1 federal. It was out of state, though.
 2 **Q. What about -- so didn't George Allen, when he**
 3 **was senator, attend one of the conventions?**
 4 A. Yes.
 5 **Q. Do out-of-state senators attend regularly the**
 6 **conventions?**
 7 A. It depends on the election year and if they are
 8 running for something themselves.
 9 **Q. So if they are running, they are more likely to**
 10 **attend?**
 11 A. Yes.
 12 **Q. Do the federal candidates or officeholders**
 13 **attend the meal functions that are referred to in the**
 14 **document?**
 15 A. Depending on their schedule.
 16 **Q. So sometimes?**
 17 A. Sometimes, yes.
 18 **Q. What happens at those meal functions other than**
 19 **eating?**
 20 A. Speeches, eating. That's it.
 21 **Q. Do the federal candidate or officeholders ever**
 22 **make the speeches?**
 23 A. Yes.
 24 **Q. Do the federal candidates or officeholders ever**
 25 **attend the VIP receptions that are referred to in the**
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1 document?
 2 A. Yes.
 3 **Q. Who else attends those receptions?**
 4 A. VIP receptions are donors, the Golden State
 5 Leadership Team members, state officials, state
 6 candidates, and sometimes celebrity guests or pundits.
 7 **Q. And sometimes federal candidates and**
 8 **officeholders, right?**
 9 A. Yes.
 10 **Q. When you say "celebrity," do you mean political**
 11 **celebrity or celebrity celebrity?**
 12 A. Generally both. The vast number is a political
 13 celebrity. Occasionally we get a Hollywood celebrity.
 14 **Q. So does that ever include a federal**
 15 **officeholder, like when a Republican Speaker of the**
 16 **House, that type of celebrity, is that what you are**
 17 **referring to?**
 18 A. Yes, and national pundits, but we had -- when
 19 we had this past one, Bill Bennett was a speaker.
 20 **Q. And what happens at the receptions?**
 21 A. The chairman and the guest usually give a few
 22 remarks and then mingle with the crowd.
 23 **Q. And the mingling is with the donors who are**
 24 **there?**
 25 A. Right, correct.

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1 than others, so priority seating would be closer to the
 2 podium.
 3 **Q. If you skip down a minute to Golden Circle,**
 4 **which also refers to priority seating. The third bullet**
 5 **point refers to priority seating. Do you see that?**
 6 A. Yes.
 7 **Q. Is the Golden Circle priority seating better**
 8 **than the Chairman's Council priority seating?**
 9 A. No.
 10 **Q. So there is no distinction between those two**
 11 **groups in the priority seating at the meal functions?**
 12 A. No.
 13 **Q. Why doesn't the CRP give better priority**
 14 **seating to the larger donors?**
 15 A. There is no reason. Generally speaking, there
 16 aren't many of these levels that participate in the
 17 state conventions. Most of these donors give their
 18 dollar amounts and don't take -- they don't participate
 19 in these stated benefits, for the most part.
 20 **Q. The first bullet point under Golden Circle**
 21 **refers to CRP campaign briefing conference calls. What**
 22 **are those calls?**
 23 A. The same as the quarterly conference calls.
 24 Since this is -- these four levels have been in effect a
 25 year ago, all benefits have been for all memberships.

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1 **Q. The fundraising events that are referred to in**
 2 **the document, do federal candidates or officeholders**
 3 **attend those?**
 4 A. I'm sorry. Say again?
 5 **Q. The document, the fourth bullet point under**
 6 **Chairman's Council, refers to fundraising events?**
 7 A. Yes, occasionally.
 8 **Q. Who are the -- who is the recipient of the**
 9 **funds raised at these fundraising events?**
 10 A. The California Republican Party.
 11 **Q. The next bullet point refers to the Golden**
 12 **State Leadership Teams suite. Could you describe what**
 13 **that suite is?**
 14 A. Yes. It's a hotel room with complimentary food
 15 and non-alcoholic beverages.
 16 **Q. Who gets access to it?**
 17 A. Any member of one of these levels, donor
 18 levels.
 19 **Q. What about the guests, the candidates and**
 20 **officeholders who are at the convention?**
 21 A. No. They don't go to our suites.
 22 **Q. The next bullet point refers to priority**
 23 **seating at CRP convention meal functions. What does**
 24 **that mean?**
 25 A. It means that we have -- some tables are better

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1 It didn't depend on the level. So when we had roughly
 2 three conference calls, they were all included, all
 3 levels.
 4 **Q. Under Golden Circle, the last bullet point**
 5 **refers to Capitol Caucus Day in Sacramento, featuring**
 6 **reception with key decision makers and political**
 7 **figures. Can you describe that event?**
 8 A. We have not done that.
 9 **Q. Does the CRP plan to do that?**
 10 A. No.
 11 **Q. Do the donors know that the CRP doesn't plan to**
 12 **do that?**
 13 A. Generally speaking, yes.
 14 **Q. Why is it on the -- why is it on the list of**
 15 **benefits?**
 16 A. The chairman created a list of benefits that
 17 were later analyzed as to cost versus donation, and some
 18 events were considered not cost effective for the
 19 donation, meaning it would cost us more to run the
 20 events than to accept the donation.
 21 **Q. What about under Leadership Circle? What about**
 22 **the second bullet point refers to intimate business**
 23 **round table events. Have those happened?**
 24 A. No.
 25 **Q. Under --**

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1 A. Wait. I'm sorry. What that refers to -- I
 2 apologize. We have a non-regularly scheduled, sometimes
 3 monthly meeting with our Senate and Assembly Republican
 4 leaders, and the Leadership Circle people get an
 5 invitation to their event.
 6 **Q. Is it only with Republican -- excuse me. Is it**
 7 **only with state legislative leaders?**
 8 A. Yes.
 9 **Q. Do federal candidates or officeholders ever**
 10 **attend?**
 11 A. No.
 12 **Q. What happens at those events?**
 13 A. They have breakfast and usually get an update
 14 from the Senate Assembly and Senate caucus leaders.
 15 **Q. An update about what?**
 16 A. Sacramento events, of legislative events.
 17 **Q. Under Golden Bears, the first bullet point**
 18 **refers to VIP accommodations. What are those VIP**
 19 **accommodations?**
 20 A. That would be at our state conventions.
 21 **Q. What are the VIP accommodations?**
 22 A. A hotel room. Nothing more than a
 23 complimentary hotel room.
 24 **Q. The last bullet point under Golden Bears refers**
 25 **to major donor events. What is that referring to?**

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1 A. That is -- oh, because we would tell 10,000 --
 2 since it's a federal limit, we would -- for some of the
 3 events, if we could get the donor to give the limit,
 4 then we told them that they would be a member of the
 5 Golden Bears of the CRP. So, generally speaking, we got
 6 the contribution before they became a Golden Bear, so
 7 the chairman included it as a benefit.
 8 **Q. I'm sorry. I don't follow. What are the**
 9 **events that this is referring to?**
 10 A. In this bullet point specifically, not a
 11 specific event, but we would give -- if a donor gave us
 12 \$10,000 for an event during the course of the year, we
 13 would give them a Golden Bear membership. We would tell
 14 them they are a member of the Golden Bears.
 15 **Q. And what did they get for their membership?**
 16 A. A pin, a lapel pin.
 17 **Q. And the rest of the benefits that are listed**
 18 **here, that actually occurred?**
 19 A. Correct.
 20 **Q. When there are events that have both donors and**
 21 **federal candidates or officeholders, are there any --**
 22 **does the CRP impose any limits on what the donors are**
 23 **allowed to say to the candidates or officeholders?**
 24 A. No.
 25 **Q. The bullet point I was just asking about that**

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1 **refers to major donor events, what's the difference**
 2 **between a major donor event versus other donor events?**
 3 A. It just -- a major donor event sounds more
 4 important. So if considerations themselves to be a
 5 major donor, they're more apt to donate the dollars.
 6 There is no distinction.
 7 **Q. Are there differences in who is invited?**
 8 A. No.
 9 **Q. Who is Ann Saro, S-A-R-O?**
 10 A. She is the director of our Golden State
 11 Leadership Team, a CRP employee.
 12 **Q. Besides the benefits we have discussed, are**
 13 **there other benefits that the CRP provides to its**
 14 **donors?**
 15 A. No.
 16 **Q. You can put that document aside.**
 17 MR. NOTI: And I'd like to ask the court
 18 reporter to mark this as Exhibit D.
 19 (Exhibit D was marked for
 20 identification.)
 21 BY MR. NOTI:
 22 **Q. This is a document labeled "Join the California**
 23 **Republican Party Golden State Leadership Team," and I'll**
 24 **represent to you that this is a printout of the PDF that**
 25 **comes up when you click on the link in the prior**

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1 **document that says "Download membership application."**
 2 **Are you familiar with this document?**
 3 A. Yes.
 4 **Q. If I could direct your attention to the second**
 5 **page of the document, about three-quarters of the way**
 6 **down, there is a question that says: "Is this a**
 7 **corporate credit card?" Excuse me, "Is this a corporate**
 8 **card?" And then in smaller font: "If this is a**
 9 **corporate card, by law it will be considered a corporate**
 10 **donation."**
 11 **Can corporations join the Golden State**
 12 **Leadership Team?**
 13 A. Yes.
 14 **Q. Do they have the same membership levels as**
 15 **individuals do?**
 16 A. Yes.
 17 **Q. Is that true even for corporations that give**
 18 **hundreds of thousands of dollars?**
 19 A. I'm sorry?
 20 **Q. Is there anything beyond the top level for a**
 21 **corporation that gives hundreds of thousands of dollars?**
 22 A. Corporations that give a larger amount
 23 generally don't participate in any of these programs.
 24 **Q. Do some of them participate?**
 25 A. Extremely rare.

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1 Q. But it does happen?

2 A. At conventions.

3 Q. So it has happened that a corporation has taken

4 advantage of the donor benefits that are offered in

5 conjunction with state conventions?

6 A. Yes.

7 Q. How does it work logistically in terms of

8 assigning the benefit to a corporation? I assume the

9 CRP doesn't just send a letter to a corporation saying

10 you are invited to an event?

11 A. For the convention, the corporate sponsor is

12 told they have X number of tickets to each of our

13 functions. They decide who to send.

14 Q. How does the CRP decide how many of those slots

15 a corporation gets or a corporate sponsor gets?

16 A. It depends on their membership level here.

17 Q. So what would \$10,000 get in terms of number of

18 slots?

19 A. Whatever -- whatever -- it lists in here how

20 many tickets you get per event, and that's what the

21 corporate sponsors get, and that's a corporate sponsor

22 for a state convention.

23 Q. I'm sorry. Where does it refer to the number

24 of tickets that you get?

25 A. Like under Leadership Circle, it says, "Two

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1 A. It just means that they are members of that --

2 that team. There's nothing specific.

3 Q. Is there anything beyond a title to it?

4 A. No.

5 Q. There aren't special conference calls that are

6 associated with that team?

7 A. Let me correct myself on that. We did have two

8 conference calls for Team California last year.

9 Q. Who was on those calls?

10 A. One of them was Christian Ferry of the McCain

11 campaign, and the other one was simply the chairman of

12 the state party and the chairman of Team California.

13 Q. The call with the McCain representative, is

14 that a different call from the one we discussed earlier?

15 A. Yes.

16 Q. Other than those two calls, has anything else

17 been done specifically for the members of the Team

18 California?

19 A. No.

20 Q. What about for people who give more than

21 \$25,000?

22 A. I'm sorry?

23 Q. Are there any additional recognition levels or

24 benefits beyond \$25,000?

25 A. No.

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1 tickets to VIP receptions, and Golden Circle one

2 complimentary ticket."

3 So they -- a corporate sponsor would get the

4 top, which would mean two, instead of one.

5 Q. If a corporation gave \$20,000 instead of 10-,

6 would they get two tickets instead of one?

7 A. They don't give that much to a state convention

8 as a sponsorship. The corporate sponsorships mostly max

9 out at \$10,000 for a convention.

10 Q. What about not for a convention?

11 A. Then this membership level doesn't --

12 corporations that give higher than \$10,000 to date have

13 not requested any membership benefits.

14 Q. Talking now about donors in general, not just

15 corporations, are there other benefits that the CRP

16 gives to donors who exceed \$10,000 in donations?

17 A. If they give \$25,000, they are a member of Team

18 California.

19 Q. What is Team California?

20 A. It's a donor organization. The membership is

21 \$25,000.

22 Q. What does that team do?

23 A. They donate funds to the CRP.

24 Q. What does membership in the team mean for the

25 donors?

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1 Q. What if somebody gives \$500,000? Do they get

2 any additional recognition?

3 A. They are a member of Team California.

4 Q. Beyond being a member of Team California?

5 A. "Recognition" meaning?

6 Q. Meaning any sort of benefit of the sort that we

7 have discussed in terms of other donors.

8 A. No.

9 Q. Why not?

10 A. Generally, at that level, it is for an event,

11 like the previous events we talked about, like the

12 McCain/Palin event, et cetera, and generally somebody of

13 that level was for -- you know, those three tiers would

14 be one of the top tiers.

15 Q. Does someone -- do individual donors ever

16 request anything from the CRP in exchange for their

17 donation?

18 A. No.

19 Q. What about not in exchange for their donation?

20 A large donor ever call up and ask the CRP to do

21 anything?

22 A. I'm sorry. Define "anything."

23 Q. I mean, literally anything. Does a large donor

24 ever contact the CRP and ask the CRP to do something?

25 A. No.

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1 Q. Never?

2 A. No.

3 Q. Does the CRP ever help its donors gain access

4 to federal officeholders?

5 A. No.

6 Q. What about federal candidates?

7 A. No.

8 Q. Why not?

9 A. There is no reason to. I mean, that's not what

10 we do.

11 Q. So a donor has never contacted the CRP and said

12 I'd really like to speak with Congressperson X?

13 A. No.

14 Q. Or when President Bush was President, I'd

15 really like to get in touch with somebody at the White

16 House. Can you help me?

17 A. Not from a major donor.

18 Q. Who, other than a major donor, has made that

19 kind of request?

20 A. We get millions of public phone calls that

21 people just call in and ask.

22 Q. Just to clarify one thing, and then we'll take

23 a break. I asked if the CRP provides its donors with

24 access to federal candidates or officeholders and you

25 said no. Just to clarify, that donors still get access

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1 to federal candidates and officeholders at the events

2 that we have discussed, correct?

3 A. Correct.

4 Q. That they attend, including conference calls?

5 A. Correct, through -- well, it -- yeah, at a

6 fundraising event, correct, they can have access through

7 that.

8 MR. NOTI: Let's take a five-minute break.

9 MR. BOPP: Sure.

10 ---

11 (Luncheon recess)

12 ---

13 MR. NOTI: Back on the record.

14 BY MR. NOTI:

15 Q. How does the CRP decide what activities to

16 spend its funds on?

17 A. It depends on the year. I'm sorry. Do you

18 mean -- I apologize. Like define how would we --

19 Q. I mean, what's the internal process for

20 decision making regarding spending?

21 A. We have a budget, a yearly budget and a

22 biannual budget or bi-yearly budget or twice --

23 MR. BELL: Two-year.

24 THE WITNESS: Two-year budget. That's what I

25 mean.

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1 BY MR. NOTI:

2 Q. Who prepares the budget?

3 A. Staff prepares the budget, and then it's run

4 through a Budget Committee, and then it's adopted by the

5 board of directors.

6 Q. Is the Budget Committee one of the entities

7 that's listed in the bylaws?

8 A. Yes.

9 Q. Is it a written document, the budget?

10 A. Yes.

11 Q. Does it include specific amounts for specific

12 activities?

13 A. Yes.

14 Q. How does the CRP decide what -- which of its

15 accounts to spend, to use for specific spending?

16 A. For the split, we -- just by legal -- whatever

17 is legal per state or federal laws.

18 Q. If something could be paid for legally with

19 either federal or non-federal dollars, how does the CRP

20 decide which to use?

21 A. I'm sorry. If --

22 Q. For activities that could be funded legally

23 with either federal or non-federal dollars, how does the

24 CRP decide which one to use for that activity?

25 A. If it can be paid with either/or, we would use

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1 the one we had the most money in, or we -- we pay --

2 which means that we pay as much state money as we can

3 before we have to use federal money.

4 Q. Why is that?

5 A. We have more state money.

6 Q. When the CRP makes a disbursement of funds,

7 what information gets recorded about that disbursement?

8 A. It's every piece of information. The -- where

9 it's spent, what it's spent on, and if there is a split

10 or which -- if it's used with federal or state dollars

11 or a split.

12 Q. What format are those records stored in?

13 A. We have an accounting system.

14 Q. An electronic system?

15 A. Yes.

16 Q. Who is responsible for compiling and

17 maintaining those records?

18 A. Our controller.

19 Q. So the disbursement records are maintained

20 separately from donation records?

21 A. Yes.

22 Q. Who is responsible for ensuring that each

23 disbursement complies with relevant campaign finance

24 law?

25 A. Our finance department.

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1 Q. How do they go about ensuring compliance?
 2 A. It depends on the disbursement as to -- a
 3 separate person does the entering, a separate person
 4 does the deposits, and a separate person does the
 5 compliance.
 6 Q. Do you know what the compliance person looks at
 7 in determining whether a specific disbursement complies
 8 with --
 9 A. State and federal campaign laws.
 10 Q. In terms of the disbursement itself, delegate
 11 who it goes to, the purpose of it, anything of that --
 12 A. Yes, all of the above.
 13 Q. Does the CRP ever circulate information about
 14 its disbursements internally?
 15 A. We have a budget versus actual record.
 16 Q. And who does that get distributed to?
 17 A. The board of directors.
 18 Q. Anybody else?
 19 A. Included with the board of directors is the
 20 Audit Committee and the Budget Committee, which are all
 21 members of the board of directors.
 22 Q. Does it get circulated to anybody else?
 23 A. No.
 24 Q. Is there any other report or summary of
 25 disbursements, other than filings with the FEC and the

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1 Q. Who has access to your disbursement records?
 2 A. Our controller has the access to our accounting
 3 software.
 4 Q. Do people on his or her staff?
 5 A. No.
 6 Q. So besides the controller, who else has access
 7 to those records?
 8 A. By "access" meaning --
 9 Q. Direct access.
 10 A. Direct access?
 11 Q. Who can actually personally view those records?
 12 A. Our controller is the only one who has direct
 13 access to the records for updating.
 14 Q. How about for viewing?
 15 A. Our finance staff has the ability to look at it
 16 too.
 17 Q. Does the COO?
 18 A. I -- I access it through the controller.
 19 Q. So when you want records, you ask the
 20 controller for them?
 21 A. Yes.
 22 Q. Okay. I'm losing my -- that was going to be my
 23 next question.
 24 Other than the COO, who requests disbursement
 25 records?

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1 California equivalent, any other report of disbursements
 2 prepared or circulated?
 3 A. No.
 4 Q. How often does that anticipated versus actual
 5 document get circulated?
 6 A. At the end of every month.
 7 Q. What format is it circulated in?
 8 A. Electronically.
 9 Q. Is it an Excel spreadsheet?
 10 A. It's report of our accounting software, which I
 11 can't remember the name of it offhand.
 12 Q. Who sends it out?
 13 A. Our controller sends it to the finance
 14 department and the chairman of the Budget/Audit
 15 Committee.
 16 Q. And then who sends it on to the board and the
 17 committees on the board?
 18 A. The treasurer.
 19 Q. Who does the treasurer get it from?
 20 A. The controller.
 21 Q. Does the CRP ever circulate information about
 22 its disbursements outside the CRP?
 23 A. No.
 24 Q. Other than government files.
 25 A. Other than public records, right.

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1 A. Anybody on the board can request.
 2 Q. Do board members actually request those
 3 records?
 4 A. Very rarely.
 5 Q. What about state candidates or officeholders?
 6 Do they request disbursement information from the CRP?
 7 A. No.
 8 Q. What about federal candidates or federal
 9 officeholders?
 10 A. No.
 11 Q. Have they ever?
 12 A. No.
 13 Q. What about the Republican National Committee,
 14 do they ever request information about the CRP's
 15 disbursements?
 16 A. No.
 17 Q. What about local Republican parties?
 18 A. No.
 19 Q. Does the CRP ever analyze the effect of its
 20 disbursements on particular elections?
 21 A. I'm sorry. Could you define that more?
 22 Q. Has the CRP ever conducted an analysis of the
 23 effect that its disbursements have had on a particular
 24 election?
 25 A. No.

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1 Q. Has the CRP ever conducted any analysis before
 2 spending money about the effect that that spending would
 3 have on a particular election?
 4 A. No.
 5 Q. Has the CRP ever prepared a report or a summary
 6 that discussed the CRP's spending on an election and the
 7 ultimate result of that election?
 8 A. I'm sorry. Could you repeat that again?
 9 Q. I'll give an example. Has the CRP, for
 10 example, ever produced a report saying we spent a
 11 hundred thousand dollars on GOTV and that produced X
 12 number more Republican voters in this election?
 13 A. Yes.
 14 Q. Are reports like that generated regularly?
 15 A. Every election year.
 16 Q. Are they generated before or after the
 17 election?
 18 A. Before, during and after, depending on the
 19 amount of availability of the data.
 20 Q. Are these written reports?
 21 A. Yes.
 22 Q. Do they still exist?
 23 A. Yes.
 24 Q. And what do -- what information do these
 25 reports contain?

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1 activities. What do you mean by "voter registration
 2 activities"?
 3 A. Registering Republicans to vote in the upcoming
 4 elections.
 5 Q. And what specific activities fall under the
 6 heading of voter registration activities?
 7 A. Registrations at fairs and festivals and
 8 shopping malls.
 9 Q. And what happens at those events specifically?
 10 Is a table set up, that kind of thing?
 11 A. Yes. A volunteer will set up a table and
 12 register people to vote as they come along.
 13 Q. What else does the CRP do that it considers to
 14 be voter registration?
 15 A. I apologize. I'm sorry. If you could be more
 16 specific on that.
 17 Q. I mean the term as it's used in Paragraph 16 of
 18 your declaration. It's also used in Paragraph 13 where
 19 there is a specific dollar amount ascribed to voter
 20 registration activities. So, in preparing that dollar
 21 amount, I assume that you had specific activities in
 22 mind. So anything that falls under that heading of
 23 roughly \$7.7 million.
 24 A. That would be paying for the setup of volunteer
 25 booths at fairs and festivals and paid registration

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1 A. Specifically voter registration and the number
 2 of Republican contacts and the number of registered
 3 Republicans.
 4 Q. Are there any other reports generated on a
 5 regular basis involving -- strike that.
 6 Would you describe the CRP's voter registration
 7 activities, what they consist of?
 8 A. Anything specific?
 9 Q. Anything that the CRP would consider voter
 10 registration.
 11 A. We -- I apologize. Could you be more specific
 12 with that?
 13 MR. NOTI: I'd like to ask the court reporter
 14 to mark this as the next exhibit, please.
 15 (Exhibit E was marked for
 16 identification.)
 17 BY MR. NOTI:
 18 Q. This is a document labeled "Declaration of Bill
 19 Christiansen." Are you familiar with this document?
 20 A. Yes.
 21 Q. This is your own declaration in this case, and
 22 you have signed it, correct?
 23 A. Yes.
 24 Q. If I could direct your attention to
 25 Paragraph 16, which uses the term voter registration

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1 programs where we pay vendors to circulate voter
 2 registration affidavits in public.
 3 Q. So the setup of registration tables at events
 4 and paid registration drives. What else would be
 5 included in voter registration activities?
 6 A. That would be it.
 7 Q. So all roughly \$7.7 million referred to in
 8 Paragraph 13 were spent on those two types of
 9 activities?
 10 A. Correct.
 11 Q. Who conducts the paid -- strike that.
 12 Who at the CRP oversees the paid registration
 13 drives?
 14 A. The political director.
 15 Q. And who conducts the drives? Who receives the
 16 payment for conducting the drives?
 17 A. It varies on different portions of the state.
 18 Q. Are they outside vendors or contractors?
 19 A. Outside of?
 20 Q. Outside of the CRP.
 21 A. Yes.
 22 Q. Are they business corporations?
 23 A. It -- it varies. It's some of all the above.
 24 Q. What groups have conducted these paid voter
 25 registration activities?

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1 A. There's -- there's paid vendors who have
 2 sub-vendors and then there are individuals.
 3 **Q. Who are the individuals?**
 4 A. There's many around the state.
 5 **Q. Now, are these individuals that receive payment
 6 in exchange for directly registering people?**
 7 A. Yes.
 8 **Q. So they are actually out on the street --**
 9 A. Yes.
 10 **Q. -- gathering the registrations?**
 11 A. Yes.
 12 **Q. And who does the CRP try to register in these
 13 voter registration activities?**
 14 A. Republicans.
 15 **Q. How do you know they are Republicans if they
 16 haven't registered yet?**
 17 A. You don't. We -- we put up -- to make sure
 18 that it's -- that the voters know who it is, we make
 19 sure that our vendors have a sign that says "Register
 20 Republican Here" and a T-shirt that says "Register
 21 Republican," but by law we don't refuse anybody who
 22 wants to register to vote.
 23 **Q. What's the goal of the registration activities?**
 24 A. To register as many Republicans as possible.
 25 **Q. For what purpose?**

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1 **Q. Does the CRP's voter registration activity
 2 affect federal elections?**
 3 A. Yes.
 4 **Q. Does the CRP intend to affect federal elections
 5 in its voter registration activity?**
 6 A. Well, our job is to elect more state and
 7 federal Republican and register more Republicans to vote
 8 for state and federal offices.
 9 **Q. So is part of the intent behind those
 10 activities to affect the federal elections as well as
 11 state?**
 12 A. Our goal is to elect more Republicans at both
 13 levels.
 14 **Q. I am just asking if the voter registration
 15 activities specifically plays into that overall role, is
 16 a part of that overall role?**
 17 A. Right. The -- yes.
 18 **Q. Moving on to get-out-the-vote activities, just
 19 as a general matter, there is voter identification and
 20 GOTV. Are those the same thing, in effect?**
 21 A. No.
 22 **Q. Okay. What's the difference between them?**
 23 A. You have to identify the voters that you want
 24 to go vote.
 25 **Q. Is voter ID basically a subset of GOTV**

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1 A. For electing Republicans in upcoming elections.
 2 **Q. State elections?**
 3 A. State and federal.
 4 **Q. How does CRP decide how much to spend on voter
 5 registration activities?**
 6 A. It depends on the current Cal Plan Committee at
 7 the time.
 8 **Q. I'm sorry. "The current" --**
 9 A. Cal Plan Committee.
 10 **Q. What is that?**
 11 A. The Cal Plan Committee, they work out the
 12 political plan for the year.
 13 **Q. Oh, that's a committee of the State Central
 14 Committee?**
 15 A. Yes.
 16 **Q. Okay. Thank you.**
 17 **Does that committee decide how much to spend on
 18 voter registration?**
 19 A. Yes.
 20 **Q. How does the CRP decide what accounts the funds
 21 for voters registration come out of?**
 22 A. Simply by federal and state law.
 23 **Q. And does the CRP use the maximum amount of
 24 non-federal funds for those activities?**
 25 A. Yes.

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1 **activity?**
 2 A. Yes.
 3 **Q. So when you refer in your declaration to GOTV
 4 activities, you are also referring to voter
 5 identification activities?**
 6 A. Yes.
 7 **Q. What do those activities consist of?**
 8 A. Which activities?
 9 **Q. Okay. Can we just -- would it be okay if we
 10 just used the general term GOTV to refer to both voter
 11 ID and GOTV?**
 12 A. Yes.
 13 **Q. So GOTV globally, what does it consist of?**
 14 A. Getting our voters to vote for election day.
 15 **Q. And what specifically does the CRP do along
 16 those lines?**
 17 A. It's different for each election year. Is
 18 there some more specific -- I'm sorry, if you want --
 19 **Q. Everything. What are all the activities that
 20 the CRP considers to be GOTV?**
 21 A. That would depend on the election year.
 22 **Q. Everything that the CRP has considered to be
 23 GOTV from 2003 to the present and including future
 24 plans, because there are, as you know, allegations or
 25 statements in your declaration about future plans for**

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1 these activities. So all of that, from 2003 through the
 2 foreseeable future.
 3 A. It would include identifying your voters and
 4 contacting those voters to make sure that they vote by
 5 absentee ballots or in person on election day.
 6 **Q. How does the CRP identify the voters?**
 7 A. By phone calls, by mail, by door-to-door
 8 knocking.
 9 **Q. What do those phone calls say?**
 10 A. Each phone call is different and has a script.
 11 **Q. How does the CRP use the phone calls to**
 12 **identify voters who want to get out to vote?**
 13 A. We would ask them questions.
 14 **Q. Like who they intend to vote for?**
 15 A. Correct.
 16 **Q. And how does the CRP use mail for its voter ID**
 17 **program?**
 18 A. It would be a response to a mailing, either by
 19 a phone call or by a return response device.
 20 **Q. And does the CRP compile information that it**
 21 **gathers through these phone calls and mail and**
 22 **door-to-door activities?**
 23 A. Yes.
 24 **Q. And how is that information compiled?**
 25 A. I'm sorry?

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1 **Q. Is it entered into a computer? Is it -- how**
 2 **does that information get collected into one place?**
 3 A. It's never collected in one place. Both
 4 electronically and written format.
 5 **Q. What's the written format where the information**
 6 **is maintained?**
 7 A. That varies by headquarters and by location of
 8 headquarters.
 9 **Q. Correct me if I'm wrong. I was under the**
 10 **impression that the CRP had only two headquarters; is**
 11 **that correct?**
 12 A. We have two offices.
 13 **Q. Then when you refer to headquarters, what are**
 14 **you referring to?**
 15 A. Election-year headquarters.
 16 **Q. Are those election-specific offices that the**
 17 **CRP sets up?**
 18 A. Meaning?
 19 **Q. Meaning in an election year, the CRP sets up**
 20 **additional offices?**
 21 A. Yes.
 22 **Q. And those offices conduct the GOTV activities?**
 23 A. Correct.
 24 **Q. Does the CRP oversee them?**
 25 A. Yes.

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1 **Q. Who at the CRP oversees those activities?**
 2 A. The political director and the Victory
 3 director.
 4 **Q. So how does the actual -- what does the CRP do**
 5 **in terms of actually getting people out to vote or**
 6 **getting them to vote absentee?**
 7 A. It's by phone calls, by voter contact, by mail
 8 and by door-to-door knocking.
 9 **Q. What about driving people to the polls?**
 10 A. Occasionally.
 11 **Q. Is there anything else that falls under GOTV**
 12 **activity?**
 13 A. No. That's it.
 14 **Q. And so the people whom the CRP tries to get out**
 15 **to vote, those are people who have already indicated in**
 16 **some format that they are going to vote Republican,**
 17 **correct?**
 18 A. Sometimes.
 19 **Q. When are they not people who have already**
 20 **indicated that they are going to vote Republican?**
 21 A. The job of the CRP is to get all Republicans to
 22 the polls, and sometimes many aren't ID'd.
 23 **Q. Understood. So they are either Republicans or**
 24 **other people who said they are going to vote Republican?**
 25 A. Correct.

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1 **Q. What's the goal of the GOTV activities?**
 2 A. To win on election day.
 3 **Q. State and federal?**
 4 A. Yes.
 5 **Q. How does the CRP decide how much to spend on**
 6 **voter registration -- excuse me, on GOTV?**
 7 A. It's through the Cal Plan Committee as well.
 8 **Q. And how does the CRP decide which account to**
 9 **use to pay for its GOTV?**
 10 A. It depends on legal counsel, what we can
 11 legally use.
 12 **Q. Does the CRP use the largest proportion**
 13 **allowable of soft money -- excuse me, of non-federal**
 14 **money?**
 15 A. Yes.
 16 **Q. In GOTV -- in voter ID and GOTV activities, do**
 17 **the phone calls and mail name specific candidates?**
 18 A. It depends on the campaign.
 19 **Q. Sometimes they do?**
 20 A. Yes.
 21 **Q. Would they ever name federal candidates**
 22 **specifically?**
 23 A. Yes.
 24 **Q. Do the CRP's GOTV activities affect federal**
 25 **elections?**

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1 A. State and federal elections.
 2 **Q. If there is an election where there are both**
 3 **state and federal elections on the ballot, how could the**
 4 **CRP do get-out-the-vote activity without affecting the**
 5 **federal election?**
 6 A. An example would be a state proposition. The
 7 CRP advocates either for or against a state proposition.
 8 **Q. But just focusing on GOTV activities, if they**
 9 **are designed to get Republicans -- primarily to get**
 10 **Republicans to the polls, how would you do that in an**
 11 **election where there are federal and state elections on**
 12 **the ballot and still only affect the state election, not**
 13 **the federal election?**
 14 A. It would depend on the law, but those same
 15 phone calls and door knocks and pieces of mail would be
 16 specifically attuned to that -- that issue.
 17 **Q. But I am talking about the effect of the**
 18 **activities. Not the content of the communications, but**
 19 **the effect. If you are increasing the number of**
 20 **Republicans going to the polls, even if all you are**
 21 **talking about in the communications is state elections,**
 22 **isn't it also affecting the federal election that's on**
 23 **the same ballot?**
 24 A. It would depend on who the voter votes for.
 25 **Q. But as a general matter, if you are sending a**

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1 A. Whatever we can do that's allowable by law
 2 that -- we are always careful as to how much
 3 communication we can do with the money that we are
 4 allowed to expend on it.
 5 **Q. Are you familiar with the term PASO?**
 6 A. Yes.
 7 **Q. What's your understanding -- and it's a term**
 8 **that you use in your declaration. What's your**
 9 **understanding of the federal PASO requirement in**
 10 **relation to ballot initiatives?**
 11 A. My understanding is that, you know, it depends
 12 on -- it's applicable to all the same federal election
 13 laws as a candidate, so we adhere to that for
 14 campaigning for those same initiatives.
 15 **Q. Is it your understanding or is it the CRP's**
 16 **understanding that a communication about a ballot**
 17 **initiative that simply mentions a federal candidate but**
 18 **doesn't PASO him or her, has to be paid for with hard**
 19 **money?**
 20 A. Yes, that's my understanding.
 21 **Q. How does the CRP decide what advertising to run**
 22 **for or against ballot initiatives?**
 23 A. It would be decided on at the -- in one of our
 24 committee levels, a Cal Plan Committee or board of
 25 directors.

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1 **million more Republicans to the polls, even if you have**
 2 **only talked about the state election, isn't that going**
 3 **to affect the federal election also?**
 4 A. It would affect both of them, state and
 5 federal.
 6 **Q. In 2008, when the CRP did get-out-the-vote**
 7 **activity, it was, in part, to help Senator McCain and**
 8 **his campaign, correct?**
 9 A. Correct.
 10 **Q. What does the CRP do in relation to ballot**
 11 **initiatives, state ballot initiatives?**
 12 A. Could you be more -- could you define that a
 13 little more?
 14 **Q. Just anything. What does the CRP do in**
 15 **relation to state ballot initiatives?**
 16 A. Endorse, oppose, include with other campaign
 17 devices.
 18 **Q. Does the endorsement and opposition include**
 19 **public communication of that position, of the CRP's**
 20 **position?**
 21 A. Yes.
 22 **Q. Other than publicly communicating the CRP's**
 23 **position on a ballot, on a particular ballot initiative,**
 24 **what else does the CRP do in relation to the other**
 25 **initiatives?**

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1 **Q. And who actually creates the advertising?**
 2 A. It varies on the campaign.
 3 **Q. Is it internally created or created by like an**
 4 **outside vendor?**
 5 A. Again, it varies on the amount of money and the
 6 year.
 7 **Q. Do you mean that it's like cheaper to do it**
 8 **internally than to hire a vendor?**
 9 A. It would depend on the media used.
 10 **Q. Oh. I understand.**
 11 **Has the CRP -- other than in connection with**
 12 **ballot initiatives, has the CRP conducted any activities**
 13 **relating to state redistricting since 2003?**
 14 A. Yes.
 15 **Q. What activities?**
 16 A. The governor's proposition that's on the
 17 ballot. The CRP stayed neutral on it last year, but the
 18 governor was able to expend funds on it through the CRP.
 19 **Q. On the -- I'm sorry. I have been using the**
 20 **term ballot initiatives. I mean that to include**
 21 **propositions and initiatives.**
 22 A. Oh.
 23 **Q. Other than questions appearing on the ballot,**
 24 **has the CRP done anything in relation to the state**
 25 **redistricting since 2003?**

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1 A. No.
2 **Q. If I could direct your attention to Paragraph 9**
3 **of your declaration.**
4 **My first question is the third line from the**
5 **bottom of the page refers to 2004, and it refers to a**
6 **roughly \$72,000 coordinated expenditure in support of**
7 **David Dreier, D-R-E-I-E-R. Quote, "A race that was not**
8 **seriously contested."**
9 **Was that a hard money expenditure?**
10 A. Yes.
11 **Q. Why did the CRP spend almost \$73,000 in hard**
12 **money on a race that was not seriously contested?**
13 A. David Dreier is a very involved congressional
14 leader and was advocating on behalf of the coordinated
15 expenditure.
16 **Q. When you say an involved leader, what do you**
17 **mean?**
18 A. He was -- he was nervous that his race would be
19 tighter than it was.
20 **Q. So he asked the CRP for the coordinated**
21 **expenditure?**
22 A. Exactly.
23 **Q. And why did the CRP agree?**
24 A. I wasn't involved in that decision at the time,
25 so I don't know specifically on that one.

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1 **Q. Were you involved in the 2006 coordinated**
2 **expenditure on behalf of the same candidate?**
3 A. No.
4 **Q. Do you know why that 2006 coordinated**
5 **expenditure on behalf of the same candidate was made in**
6 **a race that also was not competitive?**
7 A. Again, he's a very -- he's very involved in his
8 district, and he gets very concerned each year that his
9 race is going to be closer than it ends up being.
10 **Q. But a lot of members of Congress would**
11 **probably, even in various states, would probably like**
12 **coordinated expenditures. I am just asking why the CRP**
13 **would agree to spend its federal funds on non-contested**
14 **aces?**
15 A. Our congressmen rarely ask us for coordinated
16 expenses or coordinated spending.
17 **Q. Does the CRP ever say no to a request for**
18 **coordinated spending?**
19 A. No, not that I know of.
20 **Q. In your declaration, it says in 2006 the CRP**
21 **paid filing fees for 17 Congressional candidates in**
22 **non-contested races. Why did the CRP pay those filing**
23 **fees?**
24 A. To make sure we had a Republican on the ballot.
25 **Q. Are those non-contested races where Democrats**

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1 **were in state seats?**
2 A. Yes.
3 **Q. What was the goal of making sure that a**
4 **Republican was on the ballot?**
5 A. That there was both -- there was a
6 representation from the Republican party. It wasn't
7 just a one-party ballot.
8 **Q. What's the CRP's interest in ensuring that it's**
9 **not a one-party ballot?**
10 A. Because it was -- it's -- part of our job is to
11 make sure there is a Republican running in every
12 district.
13 **Q. For what purpose?**
14 A. For the two-party system.
15 **Q. Just as a matter of principle?**
16 A. Yes.
17 **Q. There is no practical reason behind it?**
18 A. I'm sorry. Meaning?
19 **Q. I'm just asking why the CRP would spend \$27,000**
20 **of federal money on races that even the CRP doesn't**
21 **intend to contest?**
22 A. That -- that makes those races contested. We
23 do it with state dollars, too, for state offices.
24 **Q. The same sentence refers to the races as,**
25 **quote, "non-contested."**

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1 A. Right. They were non-contested until we put in
2 a candidate.
3 **Q. So the purpose is purely to have a Republican**
4 **candidate on the ballot?**
5 A. Correct.
6 **Q. The declaration, the same paragraph of the**
7 **declaration, says that the CRP spent roughly \$41,000 in**
8 **the 2008 election cycle on behalf of another member of**
9 **Congress. Why did the CRP make that expenditure?**
10 A. Congressman Rohrabacher requested it.
11 **Q. How did he request it?**
12 A. Define -- I'm sorry. How --
13 **Q. How did the CRP become aware of his request for**
14 **the coordinated expenditure?**
15 A. His campaign manager called me.
16 **Q. And what did the campaign manager say?**
17 A. They wanted to do a coordinated expense.
18 **Q. For what reason?**
19 A. To -- I'm sorry?
20 **Q. Why? Why did they --**
21 A. They were concerned that the race was tight.
22 **Q. The last sentence of this paragraph, the one**
23 **that starts "after enactment of BCRA's FEA PASO**
24 **provisions," it says that the CRP eschewed including**
25 **federal candidates on its slate mailings and other**

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1 mailings in 2002, '04, '06 and '08.
 2 Although 2002 was before BCRA, wasn't it? Is
 3 that an error?
 4 A. Not -- I can't remember exactly. I thought
 5 BCRA came in '01 or '02, wasn't it?
 6 Q. I believe it became effective the day after the
 7 2002 elections, but --
 8 A. That could be.
 9 Q. First of all, this sentence refers to specific
 10 types of mailings, and it says the CRP omitted mentions
 11 of federal candidates. What about other types of
 12 mailings? Did the CRP include mentions of federal
 13 candidates in them?
 14 A. No.
 15 Q. Now, do I understand this correctly, that the
 16 CRP has not mentioned federal candidates in its slate
 17 mailings since 2003?
 18 A. Correct.
 19 MR. NOTI: I'd like to ask that this be marked
 20 as the next exhibit, please.
 21 (Exhibit F was marked for
 22 identification.)
 23 BY MR. NOTI:
 24 Q. This is a document titled "Elect Our Republican
 25 Team," and it has a hole at the top that makes me
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1 A. Correct.
 2 Q. The document that you are looking at now does
 3 refers to federal candidates. So I am trying to figure
 4 out, when you refer in your declaration to "similar
 5 voter communications," what are you referring to?
 6 A. Mail, chase mailings, similar communications.
 7 This is a doorknob hanger for precinct walking in one
 8 particular Senate district.
 9 Q. So the CRP has included federal candidates in
 10 doorknob hangers?
 11 A. Yes.
 12 Q. What other similar documents has the CRP
 13 included federal candidates on?
 14 A. Similar to?
 15 Q. I am using the term similar the way you use it
 16 in your declaration.
 17 A. Anything similar to our absentee ballot
 18 applications, chase mailings, e-mailings, anything that
 19 was our statewide voter communication for those years.
 20 Q. That's where federal candidates are not
 21 mentioned?
 22 A. Yes, correct.
 23 MR. NOTI: I'd like to ask that this be marked
 24 as the next exhibit, please.
 25 ///
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1 believe it's a door hanger; is that correct?
 2 A. Correct.
 3 Q. Is this -- first of all, was this document ever
 4 actually distributed?
 5 A. This one I do not remember -- oh, this was --
 6 yes, it was.
 7 Q. And is this a -- did the CRP pay for this?
 8 A. Yes.
 9 Q. It refers to both federal and state candidates,
 10 correct?
 11 A. Yes.
 12 Q. What other -- but -- but -- excuse me.
 13 What other public communications has the CRP
 14 put out that refer to federal candidates since 2003?
 15 A. I'm sorry. You'd have to be more specific on
 16 that one.
 17 Q. The declaration refers to slate mailings --
 18 A. Yes.
 19 Q. -- absentee ballot applications --
 20 A. Yes.
 21 Q. -- chase mailings and, quote, similar voter
 22 communications --
 23 A. Yes.
 24 Q. -- and says that federal candidates have not
 25 been mentioned in any of those things since 2002.
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1 (Exhibit G was marked for
 2 identification.)
 3 BY MR. NOTI:
 4 Q. This is a document entitled "Your Official
 5 Orange County Republican Party Endorsements." Are you
 6 familiar with this document?
 7 A. No.
 8 Q. On the first page it says that it was paid for
 9 by the California Republican Party, and it has an
 10 address that I believe is the address you mentioned at
 11 the beginning of the deposition, correct?
 12 A. Yes.
 13 Q. Have you seen this document before?
 14 A. No.
 15 Q. Do you know if it was, in fact, paid for by the
 16 California Republican Party?
 17 A. I do not know.
 18 Q. As COO, would you have had to approve this
 19 expense if the California Republican Party were going
 20 to --
 21 A. Yes.
 22 Q. -- fund this document?
 23 A. Yes.
 24 Q. On the -- the pages aren't numbered, but on the
 25 fourth page of the document, about -- which is about
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1 promise or provide any donor with," et cetera.
 2 I am asking, beyond paid and volunteer
 3 fundraisers are people associated with the CRP
 4 admonished in the same way?
 5 A. Anybody who is associated with CRP fundraising
 6 is admonished that way.
 7 Q. As COO were you admonished in this way?
 8 A. Absolutely.
 9 Q. By whom?
 10 A. By the FEC and the FPPC training seminars.
 11 Q. Has the CRP itself created any written guidance
 12 or policies about providing donors with access to
 13 elected officials?
 14 A. We have a county treasurer's briefing booklet,
 15 and I believe it mentions -- it either mentions in there
 16 or references the government guidelines on those.
 17 Q. Is there anything else besides the briefing
 18 booklet?
 19 A. Not that I am aware of.
 20 MR. NOTI: Do you want to take a break?
 21 THE WITNESS: Sure.
 22 (Recess)
 23 MR. NOTI: Back on the record.
 24 BY MR. NOTI:
 25 Q. Is there any formal relationship between the

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1 CRP and any federal officeholders?
 2 A. Formal by -- what do you mean by "formal"?
 3 Q. By formal written policy, like in the bylaws or
 4 anything like that.
 5 A. No.
 6 Q. Is there -- isn't one of the CRP's board
 7 members always a U.S. Representative?
 8 A. There is always a representative of the
 9 congressional delegation.
 10 Q. On the board of the CRP?
 11 A. Right.
 12 Q. Besides that, is there any other formal
 13 relationship between any federal officeholder and the
 14 CRP?
 15 A. In our bylaws, it has -- on our operations
 16 committee and our board of directors it says the highest
 17 ranking, but it's been so long that we have had a
 18 high-ranking federal officer that I can't remember
 19 exactly what it says.
 20 Q. How frequent is the contact between the CRP and
 21 federal officeholders or candidates?
 22 A. During a non-election year, it's very
 23 infrequent.
 24 Q. And during an election year?
 25 A. Still relatively infrequent, depending on the

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1 election.
 2 Q. When there is contact, who initiates it?
 3 A. That would depend on the election.
 4 Q. So sometimes it's the CRP and sometimes it's
 5 the candidate?
 6 A. Correct.
 7 Q. Are those usually phone conversations or in
 8 person or both?
 9 A. Both.
 10 Q. What is the purpose of that contact?
 11 A. That would depend on the issue or the election.
 12 Q. So it could be -- it could be strategy. It
 13 could be fundraising. It could be a variety of things?
 14 A. Mostly event coordination.
 15 Q. Fundraising events or campaign rallies?
 16 A. Yeah, I'm sorry. You'd have to be more
 17 definitive. That's a very broad --
 18 Q. Are you referring -- when you say "event
 19 coordination," are you referring to any particular kind
 20 of event?
 21 A. No.
 22 Q. Does the CRP ever inform federal candidates or
 23 officeholders of its planned activities?
 24 A. I'm sorry. Could you say that again?
 25 Q. Does the CRP ever inform federal candidates or

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1 officeholders of its plan, of the CRP's planned
 2 activities?
 3 A. Yes.
 4 Q. How often does that happen?
 5 A. As often as we have activities that they can
 6 participate in.
 7 Q. So when the CRP has an event that federal
 8 officeholders or candidates might want to attend, you
 9 tell them about it?
 10 A. Absolutely.
 11 Q. Has there ever been a situation where the CRP
 12 has changed its plans or its strategy based on feedback
 13 from a federal officeholder or candidate?
 14 A. Gosh. About -- by plans and strategy, what do
 15 you mean?
 16 Q. I mean something that the CRP intends to do
 17 that then changes after a discussion, as a result of a
 18 discussion with a federal officeholder or candidate.
 19 A. I apologize. You have to more specific on
 20 that. That would be -- that's -- like do you have an
 21 example of --
 22 Q. Sure. CRP intends to do GOTV in Congressional
 23 District 20, but you talked to a candidate in a
 24 different district and decides to do GOTV somewhere else
 25 or to spend more money on it or anything like that.

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1 A. The only example on that lines I can give you
 2 would be our coordinated congressional expenses that we
 3 didn't plan at the beginning of the campaign to do those
 4 coordinated expenses until we had more information.
 5 **Q. Until the campaign contacted you and asked for**
 6 **the coordinated expenditure?**
 7 A. Correct.
 8 **Q. Anything else along those lines happen?**
 9 A. No. We have very little contact that they
 10 participate in.
 11 **Q. What's the relationship in general between the**
 12 **CRP and the RNC?**
 13 A. It's usually a good relationship, depending on
 14 the personalities.
 15 **Q. Other than the National Committee members, the**
 16 **CRP's National Committee members, is there any other**
 17 **formal relationship between the two?**
 18 A. Formal, no.
 19 **Q. How frequently does the CRP contact the RNC**
 20 **about anything?**
 21 A. Fairly frequent during campaign years and very
 22 infrequent during non-campaign years.
 23 **Q. During campaign years, what kind of things does**
 24 **the CRP contact the RNC about?**
 25 A. Voter contact goals, voter registration goals,

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1 and last year the joint fundraising agreement.
 2 **Q. And why does the CRP contact the RNC about**
 3 **voter contact and voter registration rules?**
 4 A. Last year we let them know on a weekly basis if
 5 we were hitting our goals.
 6 **Q. What's the purpose of doing that?**
 7 A. The RNC was measuring how close to goal all the
 8 different states were.
 9 **Q. So they asked for that information, the RNC**
 10 **asked for that information from the CRP?**
 11 A. Yes.
 12 **Q. Was there any other information that the CRP**
 13 **sent to the RNC on a regular basis?**
 14 A. It was voter registration, voter contact is the
 15 only regular basis information.
 16 **Q. What about on a one-on-one off basis?**
 17 A. It would depend on if there is travel by an RNC
 18 member or a -- or an event. But, again, there is not
 19 much contact between the two coasts.
 20 **Q. Does the RNC have any say in the CRP's**
 21 **strategies?**
 22 A. No.
 23 **Q. What about kind of informally? Does the RNC**
 24 **ever communicate approval or disapproval of something**
 25 **the CRP is doing?**

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1 A. No.
 2 **Q. What's the relationship between the CRP and the**
 3 **California local Republican parties?**
 4 A. Informal.
 5 **Q. How frequent -- you mentioned some forms of**
 6 **contact, like briefing county treasurers and things like**
 7 **that. Strike that.**
 8 **Does the CRP ever coordinate its activities**
 9 **with local Republican organizations?**
 10 A. Yes.
 11 **Q. In what types of contexts?**
 12 A. Voter registration, voter contact.
 13 **Q. Anything else?**
 14 A. No.
 15 **Q. I mean, if the CRP is going to hold a rally in**
 16 **San Diego, is there a communication between the CRP and**
 17 **the San Diego party about logistics --**
 18 A. Yes.
 19 **Q. -- that sort of thing?**
 20 A. Yes.
 21 **Q. Anything else along those lines where the CRP**
 22 **interacts with the local parties?**
 23 A. Events. Again, events, voter registration,
 24 voter contact goals during election year.
 25 **Q. What about strategic things other than voter**

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1 **registration and voter contacts and more big picture**
 2 **stuff?**
 3 A. During election year, that is our strategy, the
 4 two things, voter registration and voter contact.
 5 **Q. What about advertising?**
 6 A. No.
 7 **Q. I'd like to ask a few questions about the**
 8 **future now. The first one is, if you were to win this**
 9 **lawsuit, what would change about the CRP's fundraising**
 10 **practices, just fundraising?**
 11 A. We would have the ability to go to more state
 12 dollar donors and give them a better idea of what we
 13 intend to do campaign wise.
 14 **Q. Well, you are already trying to raise money**
 15 **from state dollar donors, right?**
 16 A. Right.
 17 **Q. So how would the actual fundraising interaction**
 18 **change?**
 19 A. The solicitation would include more specific
 20 references to state issues and candidates.
 21 **Q. Would you solicit donations from different**
 22 **sources than you currently do?**
 23 A. No.
 24 **Q. Is there any other way that you anticipate the**
 25 **fundraising practices changing if you were to win this**

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1 case?
 2 A. No. No.
 3 Q. What about your practice in terms of donor
 4 information, maintaining and distributing donor
 5 information? Would anything change?
 6 A. No.
 7 Q. What about spending? How would the CRP spend
 8 money differently if it won this lawsuit?
 9 A. If we were allowed to change our mix-up, then
 10 we would -- we would change that accordingly to spend
 11 more state dollars where applicable?
 12 Q. Why?
 13 A. State dollars are easier to raise.
 14 Q. Why is that?
 15 A. They can come in larger amounts.
 16 Q. And they can come from corporations as well,
 17 right?
 18 A. Correct.
 19 Q. If the CRP were to win this lawsuit, would it
 20 take any affirmative steps, beyond the steps we've
 21 already discussed, to prevent individuals or
 22 corporations who make large state donations from gaining
 23 access to federal candidates and officeholders?
 24 A. The -- the -- the information that we have now
 25 is fairly comprehensive, so things wouldn't change

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1 A. Yes.
 2 Q. Are documents stored in the backup system and
 3 on the laptops?
 4 A. We have a main server in our Burbank
 5 headquarters where everything is backed up to.
 6 Q. The CRP has an e-mail system, right?
 7 A. Yes.
 8 Q. Does it have an automatic delete? Is it set to
 9 automatically delete e-mails after a certain time?
 10 A. No. To the extent of my technical knowledge,
 11 it backs it up and keeps the records as long as the
 12 backup tape has room for it, which I cannot -- I don't
 13 know how long that timeframe is.
 14 Q. Are the backup tapes stored indefinitely, or
 15 are they overwritten?
 16 A. They are overwritten.
 17 Q. Do you know how frequently they are
 18 overwritten?
 19 A. Once a week.
 20 Q. So the backup only goes back one week at any
 21 given time?
 22 A. No. I think the backup goes back 30 days at
 23 any one given time, at least.
 24 Q. Are you familiar with the CRP's Web site?
 25 A. Yes.

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1 because we would feel that we are already very
 2 comprehensive in what information we distribute
 3 regarding that.
 4 Q. So the CRP isn't anticipating anything in
 5 addition to its current practices?
 6 A. No.
 7 Q. Okay. I have a few recordkeeping questions to
 8 finish up.
 9 Where does the CRP keep its files, its paper
 10 files?
 11 A. In our Burbank office, our Sacramento office,
 12 and our legal counsels' office.
 13 Q. Is there any particular person in charge with
 14 maintaining the files?
 15 A. It would depend on the file.
 16 Q. How far back do they go?
 17 A. At least seven years.
 18 Q. What about electronic document storage? Where
 19 does the CRP store its electronic documents?
 20 A. The same three locations.
 21 Q. What medium are they stored in?
 22 A. Hard drives of our computers.
 23 Q. Is there a backup system?
 24 A. Yes, there's a backup system.
 25 Q. Does CRP have laptops?

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1 Q. When items appear on that Web site under the
 2 chairman's name, who actually writes them?
 3 A. The chairman.
 4 Q. Okay. Is it subject to any sort of approval
 5 process?
 6 A. No. He generally writes it directly onto the
 7 Web site.
 8 Q. Are those postings accurate reflections of what
 9 the chairman believes at the time?
 10 A. Of what the chairman believes, yes.
 11 Q. Without getting into anything that you have
 12 discussed with your attorneys or without revealing the
 13 content of anything you have discussed with your
 14 attorneys, have you been advised to retain documents
 15 that are relevant to this case?
 16 A. No.
 17 Q. Has the CRP in general been advised to retain
 18 documents that are relevant in this case?
 19 A. No.
 20 Q. To your knowledge, have any documents relevant
 21 to this case been deleted or thrown away since this case
 22 started?
 23 A. No, not to my knowledge.
 24 Q. But if there were any relevant e-mails that
 25 existed when this case began, they could have been

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FEC Exhibit 3

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1
2 UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF COLUMBIA
4 ----- X
5 REPUBLICAN NATIONAL COMMITTEE,
6 et al.,
7 Plaintiffs, Civ. No.
8 v. 08-1953(BMK,RJL,RMC)
9 FEDERAL ELECTION COMMISSION,
10 Defendant.
11 ----- X
12 750 B Street, Suite 1850
13 San Diego, California 92101
14 February 24, 2009, 3:14 p.m.

15
16
17 30 (b)(6) DEPOSITION of
18 REPUBLICAN PARTY OF SAN DIEGO COUNTY
19 By: JONATHAN BUETTNER

20
21
22
23 lipka.com, inc.
24 (888) lipka-com
25 info@lipka.com

1

Page 2

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19 BY: ADAV NOTI, ESQ.
20 KEVIN DEELEY, ESQ.
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16 DEPOSITION EXHIBITS
17 NUMBER DESCRIPTION IDENTIFIED
18 A Document titled "Defendant 9
19 FEC's Notice of Deposition to
20 Plaintiff Republican Party of
21 San Diego County"
22
23 B Bylaws of the Republican Party 12
24 of San Diego County As Adopted
25 on December 8, 2008

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7 Chairman's Circle Club
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5 Discovery Requests to

6 Plaintiffs California

7 Republican Party and Republican

8 Party of San Diego County

9

10 K Plaintiff Republican Party of 93

11 San Diego's Discovery Responses

12

13

14

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Page 6

1 JONATHAN BUETTNER,

2 Having been administered an oath, testified as follows:

3

4 EXAMINATION

5 BY MR. NOTI:

6 Q. Good afternoon, Mr. Buettner.

7 A. Hi.

8 Q. My name is Adav Noti. I am an attorney with

9 the Federal Election Commission. With me is Kevin

10 Deeley, who is also with the FEC, and you are

11 represented today by your counsel.

12 Would you please state your full name and your

13 business address for the record?

14 A. My full name is Jonathan Edward Buettner,

15 B-U-E-T-T-N-E-R. The business address is 5703 Overland

16 Drive, Suite 107, San Diego, California 920 -- 92120.

17 Q. Have you ever been deposed before?

18 A. No.

19 Q. I'll explain how the deposition is going to

20 proceed.

21 I am going to ask you a series of questions,

22 and the court reporter is going to take down my

23 questions and your answers, so it's important that you

24 answer verbally and not with nods or gestures. Okay?

25 A. Yes.

6

Page 7

1 Q. If you don't hear or understand a question,

2 please tell me so I can restate it. If you answer a

3 question, I will assume that you have heard it and

4 understood it. Okay?

5 A. Okay.

6 Q. Since the court reporter can only take down one

7 person's words at a time, please let me finish my

8 question before you answer, even if you know the answer

9 before I am done.

10 A. Yes.

11 Q. And if you need a break at any time, please let

12 me know and we can take one. I only ask that you not

13 take a break while the question is pending. Okay?

14 A. Yes.

15 Q. Is there any reason that you can't give

16 truthful and accurate testimony today?

17 A. I think the answer to that would be no.

18 Q. Do you have any questions for me before we

19 begin?

20 A. No.

21 Q. Where do you presently work?

22 A. I am employed by the Republican Party of San

23 Diego County.

24 Q. Can we call it the -- do you call it the RPSD?

25 A. Yes.

7

Page 8

1 Q. Is there a short form for it? It's going to

2 get cumbersome.

3 A. That's fine, yes.

4 Q. What's your title?

5 A. I do not have a title.

6 Q. How long have you been with the RPSD?

7 A. Since July of 2004, in formal employment.

8 Q. What are your responsibilities at the RPSD?

9 A. My responsibilities had been chief operating

10 officer, which is equivalent to executive director. So

11 I oversaw the development and execution of our political

12 plans, oversaw our campaigns, coordinating with multiple

13 individuals inside and outside the organization.

14 Q. Are you no longer the COO?

15 A. That is correct.

16 Q. Who is the current COO?

17 A. A gentleman by the name of Barrett Tetlow.

18 B-A-R-R-E-T-T. Tetlow is T-E-T-L-O-W.

19 Q. Even though you are not the COO anymore, you

20 are still employed by the RPSD?

21 A. Yes.

22 Q. Before you came to the RPSD, where were you

23 employed?

24 A. IBM -- sorry. Hitachi Limited Corporation.

25 Prior to that IBM.

8

Jonathan Buettner

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Page 9

1 MR. NOTI: I'd like the court reporter to mark
 2 this as Exhibit A, please.
 3 (Exhibit A was marked for
 4 identification.)
 5 BY MR. NOTI:
 6 **Q. These are identical?**
 7 A. Yes.
 8 **Q. This is a document entitled "Defendant FEC's**
 9 **Notice of Deposition to Plaintiff Republican Party of**
 10 **San Diego County."**
 11 **Are you familiar with this document?**
 12 A. Yes.
 13 **Q. Are you aware that you are here today as the**
 14 **designee of the RPSD to answer questions about the**
 15 **topics listed on the last two pages of the document?**
 16 A. Yes. Yes.
 17 **Q. Did you have any meetings to prepare for**
 18 **today's deposition?**
 19 A. Yes.
 20 **Q. With whom did you meet?**
 21 A. Counsel.
 22 **Q. Did you meet with -- other than with your**
 23 **attorneys, did you talk to anybody about today's**
 24 **deposition?**
 25 A. Yes.

9

Page 11

1 A. The Republican Party of San Diego County is a
 2 county committee composed of over 64 members and
 3 alternant members with elected officers out of the
 4 membership that are duly elected by the public in a
 5 partisan primary, consisting of a chairman, two
 6 vice-chairmen, treasurer, secretary, assistant
 7 treasurer, who is compensated.
 8 Staff consists of -- would consist of the
 9 executive director or, in my case, chief operating
 10 officer, and any other subsidiary staff members hired at
 11 the discretion of the committee.
 12 **Q. So the officers are elected directly by the**
 13 **public?**
 14 A. The officers are elected by the members which
 15 are elected by the public. The committee is broken down
 16 into assembly districts with six officer seats open in
 17 each assembly district. We have eight assembly
 18 districts in the county. The committee is also composed
 19 of one ex-officio member from all of the partisan --
 20 each of the partisan offices that are represented in the
 21 county. Five congressional offices, three Senate, eight
 22 Assembly. Am I missing anything? I don't think I am
 23 missing anything.
 24 MR. NOTI: If I could ask the court reporter to
 25 mark this as Exhibit B, please.

11

Page 10

1 **Q. Whom did you talk to?**
 2 A. Chief operating officer of California
 3 Republican Party.
 4 **Q. Mr. Tetlow?**
 5 A. No, Mr. Christiansen.
 6 **Q. Oh, I'm sorry. The CRP. I apologize.**
 7 A. Yes.
 8 **Q. What did you discuss with Mr. Christiansen?**
 9 A. Several of the questions, components of the
 10 questions.
 11 **Q. Which questions?**
 12 A. All of them.
 13 **Q. Other than documents that your lawyers might**
 14 **have shown you, did you review or prepare any documents**
 15 **in preparation for the deposition?**
 16 A. No.
 17 **Q. And for the record, what -- well, are you going**
 18 **to be consulting the folder that's in front of you**
 19 **during the deposition?**
 20 A. The folder before me is merely only the
 21 documents that were sent to me by general counsel.
 22 **Q. Okay.**
 23 A. Nothing else.
 24 **Q. Okay. Would you please explain how the RPSD is**
 25 **structured.**

10

Page 12

1 (Exhibit B was marked for
 2 identification.)
 3 BY MR. NOTI:
 4 **Q. Are you familiar with this document?**
 5 A. Yes.
 6 **Q. What is it?**
 7 A. This document is the Bylaws of the Republican
 8 Party of San Diego County as adopted on December 8,
 9 2008.
 10 **Q. Is it the most recent version of the bylaws?**
 11 A. I have not read it. I do not know.
 12 **Q. Is December -- have new bylaws been adopted or**
 13 **amended since December 8, 2008?**
 14 A. I do not know.
 15 **Q. When did you stop being COO of the RPSD?**
 16 A. My interaction in that capacity ended on
 17 December 15th.
 18 **Q. 2008?**
 19 A. Yes.
 20 **Q. You understand that the information that we are**
 21 **asking for today goes through the present day and --**
 22 A. Yes.
 23 **Q. -- in some cases beyond and doesn't stop on the**
 24 **day that you stopped being COO, correct?**
 25 A. Yes.

12

Jonathan Buettner

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1 Q. Okay. Do the bylaws accurately reflect how the
 2 RPSD is structured?
 3 A. Yes.
 4 Q. Would you turn to Page 12, please, the
 5 paragraph labeled 2.05.02(G). Do you see that
 6 paragraph?
 7 A. These are my Internet glasses. I do. May I
 8 read it to myself?
 9 Q. Please do, yes.
 10 A. Thank you.
 11 Okay. I have read it.
 12 Q. Does this -- does the Candidate Recruitment
 13 Committee actually exist?
 14 A. Yes.
 15 Q. Does it recruit candidates for federal offices?
 16 A. No. Well, it has not in the past.
 17 Q. It hasn't recruited candidates for the U.S.
 18 House?
 19 A. No.
 20 Q. And that committee is chaired by a man named
 21 Jim Kelly; is that correct?
 22 A. To the best of my knowledge, yes.
 23 Q. And who is Mr. Kelly?
 24 A. A member of the committee.
 25 Q. Is he an elected official of any kind?

13

Page 15

1 Q. There are no formal responsibilities for the
 2 second vice-chairman?
 3 A. Correct.
 4 Q. Do either of the vice-chairmen have operational
 5 day-to-day responsibilities?
 6 A. No.
 7 Q. What are the secretary's responsibilities?
 8 A. Recording, recording meetings, tracking and
 9 maintaining a database of the membership.
 10 Q. Does the secretary personally record the --
 11 A. Yes.
 12 Q. -- the minutes of the meetings?
 13 A. (Witness nods head.)
 14 MR. BOPP: Wait until he finishes the question
 15 before you answer.
 16 THE WITNESS: Thank you. Yes.
 17 BY MR. NOTI:
 18 Q. Does the secretary personally record the events
 19 of the meetings?
 20 A. Yes.
 21 Q. Does the secretary circulate minutes of
 22 meetings?
 23 A. Through staff, yes.
 24 Q. What is -- what information is contained in the
 25 membership database that the secretary maintains?

15

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1 A. I believe he is an elected official, yes.
 2 Q. What office does he hold?
 3 A. I believe he's on a school board in the county.
 4 Q. The chairman of the RPSD is Tony K-R-V-A-R-I-C;
 5 is that correct?
 6 A. That is correct.
 7 Q. What are the chairman's responsibilities?
 8 A. The chairman represents the party to the
 9 public. The chairman coordinates and recommends
 10 appointment for the subcommittees of the party, and the
 11 standing committees of the party and ad hoc committees
 12 in consultation with the executive committee.
 13 Q. Does the chairman have any day-to-day
 14 operational responsibilities for the RPSD?
 15 A. The chairman approves expenditures, all
 16 expenditures, as prescribed by our budget.
 17 Q. Is the chairmanship a volunteer position?
 18 A. Yes.
 19 Q. What are the first vice-chairman's
 20 responsibilities?
 21 A. None. There are none defined.
 22 Q. In practice are there any?
 23 A. No.
 24 Q. What about the second vice-chairman?
 25 A. Correct.

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1 A. Name, address, e-mail, telephone number,
 2 information for members and alternate members of the
 3 committee, including ex-officio and ex-officio alternate
 4 members.
 5 Q. Is there any financial information in that
 6 database?
 7 A. No.
 8 Q. What are the treasurer's responsibilities?
 9 A. To oversee and approve the financial elements
 10 of what is executed by the committee.
 11 Q. And I believe you mentioned an assistant
 12 treasurer position; is that correct?
 13 A. Yes.
 14 Q. Which is a paid position?
 15 A. Yes.
 16 Q. And it's the only one of these six that's paid;
 17 is that correct?
 18 A. That is correct.
 19 Q. And what does the assistant treasurer do?
 20 A. The assistant treasurer records all
 21 transactions and composes all filings for state and
 22 federal requirements.
 23 Q. Records transactions, both incoming funds and
 24 outgoing?
 25 A. Yes.

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1 Q. Are there any other RPSD officers besides the
 2 ones we have mentioned?
 3 A. No. Well, there are the subcommittee chairs,
 4 but they are not officers.
 5 Q. How many people are employed by the RPSD?
 6 A. Presently I do not know. I can speculate,
 7 but --
 8 Q. As of your most recent knowledge, how many
 9 people were employed by the RPSD?
 10 A. Three.
 11 Q. Do you have any reason to believe that has
 12 changed since then?
 13 A. I believe so.
 14 Q. Do you believe it's gotten higher or lower?
 15 A. I believe it's lower.
 16 Q. Are those three full-time employees?
 17 A. No.
 18 Q. How many are full time?
 19 A. Two.
 20 Q. And that's the assistant treasurer and the COO,
 21 or not?
 22 A. The assistant treasurer was paid a monthly fee,
 23 so I don't consider the assistant treasurer to be an
 24 employee of the organization.
 25 Q. So besides the COO, who were the other paid

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1 less than a million, to election years where it can
 2 exceed two-and-a-half million dollars.
 3 Q. How does the RPSD raise funds?
 4 A. Direct mail, which is executed by staff, in
 5 coordination with -- with the leadership, and then
 6 through direct ask and fundraising events coordinated
 7 with the leadership of the organization and staff.
 8 Q. Who at the RPSD makes the strategic decisions
 9 about fundraising?
 10 A. Generally the chairman in consultation with
 11 staff.
 12 Q. Who makes decisions about specific
 13 solicitations, specific pieces of direct mail, specific
 14 fundraisers, that kind of thing?
 15 A. Direct mail is staff; direct ask would be the
 16 chairman. Requests for donations.
 17 Q. When the RPSD holds a fundraiser, an in-person
 18 fundraiser, who organizes it?
 19 A. It depends.
 20 Q. What does it depend on?
 21 A. The type of fundraiser.
 22 Q. What types of fundraisers are there?
 23 A. We have -- staff executes two fundraising
 24 events per year. One is a sit-down dinner, one is a
 25 reception, each occurring in different seasons. The

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1 employees?
 2 A. The political director and our operations
 3 manager, who was part time.
 4 Q. Is there anybody who works full time for the
 5 RPSD but doesn't get paid?
 6 A. Yes.
 7 Q. Who?
 8 A. Me. Presently.
 9 Q. Can you explain the situation that you have
 10 with the RPSD in terms of no longer being COO, but still
 11 being employed without a title?
 12 A. I am employed until the end of March.
 13 Q. Are there any divisions or departments within
 14 the RPSD?
 15 A. I don't understand the question.
 16 Q. Are there any formal -- well, strike that.
 17 Are there any consultants or contractors who
 18 aren't technically RPSD employees, but who work for the
 19 RPSD full time?
 20 A. Presently? I do not know.
 21 Q. What about the assistant treasurer position?
 22 A. To the best of my knowledge, the assistant
 23 treasurer does not work for the party full time.
 24 Q. What's the RPSD's annual budget?
 25 A. It ranges, in off-election years, to something

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1 party will also execute other fundraisers in
 2 consultation with fundraising vendors, most -- mostly
 3 during the campaign season, usually in support of a
 4 candidate or a measure.
 5 Q. Who gets invited to the sit-down dinner?
 6 A. Activists and donors.
 7 Q. Any particular donors?
 8 A. All donors.
 9 Q. Everybody who has previously given to the RPSD?
 10 A. Anyone who has previously given to the party,
 11 yes.
 12 Q. Are there differing levels of invitations based
 13 on previous donations?
 14 A. No.
 15 Q. Are there different tiers of tickets for the
 16 sit-down dinner, some more expensive than others?
 17 A. Yes.
 18 Q. How do those tiers, how are they
 19 differentiated?
 20 A. Different levels of -- how would you put it?
 21 Is it patronage? Example: Platinum sponsor, gold
 22 sponsor, silver sponsor, bronze sponsor. Each one
 23 defined with certain benefits, whether the individual is
 24 on the program, whether the individual or -- when I say
 25 individual in this case, I mean individual or

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1 corporation is in the program or on a banner or
 2 billboard or whether the individual or corporation is
 3 allowed to have their banner or corporate banner or
 4 billboard within the hall. Different levels of
 5 acknowledgment, depending upon your donation level.
 6 **Q. What's the top tier amount?**
 7 A. Platinum.
 8 **Q. In dollar figures, how much is it?**
 9 A. It varies, but platinum is generally 5,000 and
 10 more.
 11 **Q. Do party officers and leaders attend the**
 12 **dinner?**
 13 A. Usually, yes.
 14 **Q. What about state candidates and state**
 15 **officeholders?**
 16 A. They are invited. Occasionally they attend.
 17 **Q. What about federal candidates or federal**
 18 **officeholders?**
 19 A. They are invited. Occasionally they attend.
 20 **Q. Which federal candidates or officeholders have**
 21 **attended a dinner?**
 22 A. In the past, Congressman Issa, Congressman
 23 Bilbray, Congressman Hunter, Congressman Cunningham, and
 24 other unelected candidates that were running for federal
 25 office.

21

Page 23

1 A. Yes.
 2 **Q. Are they basically the same as for the sit-down**
 3 **dinner?**
 4 A. Yes.
 5 **Q. And do the same state and federal candidates**
 6 **attend?**
 7 A. On occasion. I can only recollect one.
 8 **Q. One who attended the reception?**
 9 A. Yes.
 10 **Q. But more have attended the sit-down dinner?**
 11 A. Yes.
 12 **Q. What about the vendor-run events? Who is**
 13 **invited to those?**
 14 A. In all cases except one, state and local
 15 candidates and -- and donors.
 16 **Q. When you say "except one," what do you mean?**
 17 A. During this last election cycle, we had as a
 18 guest speaker a congressman, Congressman Bilbray, at one
 19 of these events.
 20 **Q. Which donors are invited?**
 21 A. I think it's -- I have actually only attended
 22 one of those fundraisers. I believe it's donors of a
 23 certain level who would be giving for our local
 24 campaign.
 25 **Q. What is the certain level?**

23

Page 22

1 **Q. House candidates?**
 2 A. Yes.
 3 **Q. What about Senate or Presidential candidates?**
 4 A. Not to my knowledge, no.
 5 **Q. Have the federal candidates or officeholders,**
 6 **have they spoken at the events?**
 7 A. On occasion, yes.
 8 **Q. Has the chairman of the RNC ever attended one**
 9 **of these events?**
 10 A. No.
 11 **Q. Approximately what percent of your funds,**
 12 **RPSD's funds, are raised through in-person fundraisers?**
 13 A. I don't understand the question.
 14 **Q. Of the total amount of donations that the RPSD**
 15 **takes in, what percent comes from these in-person**
 16 **fundraisers?**
 17 A. I don't understand "in-person fundraisers."
 18 **Q. I apologize. I mean as opposed to a mail**
 19 **solicitation or a telephone solicitation, somebody who**
 20 **pays to attend an event.**
 21 A. Depending -- so you are speaking of our events?
 22 **Q. Yes.**
 23 A. Perhaps 40 to 50 percent.
 24 **Q. What about the reception that you mentioned?**
 25 **Does that also have different tiers of ticket levels?**

22

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1 A. I seem to recall it was donations of 5,000 or
 2 more. But actually, now, I seem to recall that there
 3 were donations of less. So it was probably a thousand
 4 or more.
 5 **Q. And the one time that the member of Congress**
 6 **came to the event, did he speak?**
 7 A. Yes.
 8 **Q. Did he meet with the donors who were attending?**
 9 A. I do not know. As I recall, we followed a
 10 specific procedure that was defined by legal counsel
 11 regarding this fundraiser. Specifically, how it was
 12 advertised, all to conform with federal rules.
 13 **Q. Does the RPSD raise funds through telephone**
 14 **solicitations?**
 15 A. No.
 16 **Q. When the RPSD solicits by direct mail, who**
 17 **creates the mailing?**
 18 A. The physical manufacturing of the mail occurs
 19 in-house. The text of the mailing is composed in
 20 conjunction -- well, primarily authored by a member of
 21 the committee in conjunction with staff.
 22 **Q. Who has final say or final approval over the**
 23 **mailing?**
 24 A. The chairman.
 25 **Q. And who did the -- who does the mail get sent**

24

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1 account, something along those lines?
 2 A. I believe so.
 3 **Q. When you receive a donation, what information**
 4 **do you record about the donation or the donor?**
 5 A. Staff records address information, name of the
 6 donor, amount of the donation, and when the donation was
 7 made, and then we courier the donation to our assistant
 8 accountant who -- I'm sorry, assistant treasurer who
 9 attributes it, records it in some sort of accounting
 10 software.
 11 **Q. Do you know what software is used?**
 12 A. QuickBooks and State Craft, I think. That's a
 13 question best answered by the assistant treasurer.
 14 **Q. Who has access to those records?**
 15 A. Any member of the committee.
 16 **Q. Anybody else?**
 17 A. I -- I believe that the public has access
 18 through reports, through the Fair Political Practices
 19 Commission and the FEC.
 20 **Q. I am talking now just about the RPSD's internal**
 21 **records, not filings with the government. Who has**
 22 **access to those?**
 23 A. I believe our bylaws allow for members of the
 24 committee and no one else. I'm not certain, though.
 25 **Q. And the assistant treasurer has access,**
 33

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1 records because we consider them proprietary.
 2 **Q. Why would a candidate in a non-competitive race**
 3 **ask for donation records?**
 4 A. So that they can solicit donations, I assume.
 5 **Q. Does the RPSD prepare reports or summaries of**
 6 **its donations other than for government filings?**
 7 A. In the form of income and expenditures, yes.
 8 **Q. How about in any other form?**
 9 A. In strategic presentations to candidates and
 10 donors, but not in specific ways, just in broad terms.
 11 **Q. Who receives the income and expenditure**
 12 **reports?**
 13 A. The members of the executive committee.
 14 **Q. Do they ever -- do those reports ever identify**
 15 **individual donors or individual donations?**
 16 A. No.
 17 **Q. Even if a really big donation has come in?**
 18 A. That is correct. No.
 19 **Q. And the strategic presentations, do they ever**
 20 **identify individual donors or donations?**
 21 A. No.
 22 **Q. Does the RPSD provide anything to a donor in**
 23 **exchange for a specific donation?**
 24 A. Yes.
 25 **Q. What does the RPSD provide?**
 35

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1 correct?
 2 A. Yes.
 3 **Q. Anybody else?**
 4 A. Just members of the committee.
 5 **Q. Does the COO have access?**
 6 A. Yes. Sorry. Thank you.
 7 **Q. What about the political director or other**
 8 **staff?**
 9 A. Yes.
 10 **Q. Other than filings with the government, do you**
 11 **ever distribute information about your donors?**
 12 A. No.
 13 **Q. Other than the people who already have access**
 14 **to your internal donation records, does anyone ever**
 15 **request access to those records?**
 16 A. No. Only the treasurer.
 17 **Q. Has any state candidate or officeholder ever**
 18 **requested access to your donor records?**
 19 A. No.
 20 **Q. Has any federal candidate or officeholder ever**
 21 **requested access to your donation records?**
 22 A. Yes.
 23 **Q. Who?**
 24 A. Several candidates in uncompetitive
 25 congressional districts, but we have not given them the
 34

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1 A. The promise that their donation will be used
 2 wisely.
 3 **Q. Anything else?**
 4 A. Basically, no.
 5 MR. NOTI: I'd like to ask that this be marked
 6 as the next exhibit, please.
 7 (Exhibit C was marked for
 8 identification.)
 9 BY MR. NOTI:
 10 **Q. Are you familiar this document?**
 11 A. Yes.
 12 **Q. What is it?**
 13 A. It is our Web site, Web page, to sign up to
 14 become a member of a donor club.
 15 **Q. On the first page of the document, most of the**
 16 **way towards the bottom, there is a club level labeled**
 17 **"Chairman's Pinnacle, Annual Membership \$5,000," but**
 18 **unlike the rest of the levels there is no -- there are**
 19 **no benefits listed. Is there any particular reason for**
 20 **that?**
 21 A. No.
 22 **Q. Do Chairman's Pinnacle donors receive benefits**
 23 **that are different from Chairman's Circle donors?**
 24 A. Pinnacle members are extended all of the
 25 benefits of all of the clubs, and also invited to attend
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1 all fundraisers that the party puts on.
 2 **Q. And are those the fundraisers that we discussed**
 3 **earlier, the two annual ones and the campaign-related**
 4 **ones?**
 5 A. Yes.
 6 **Q. The next -- I'm sorry. Are there any other**
 7 **benefits that are extended to Chairman's Pinnacle**
 8 **members that other donors don't receive?**
 9 A. No.
 10 **Q. The next level is the Chairman's Circle, and in**
 11 **the description the second paragraph refers to private**
 12 **complimentary VIP meetings and events with major**
 13 **Republican leaders and candidates. Do you see that?**
 14 A. Yes.
 15 **Q. Could you describe those meetings, please.**
 16 A. The party has put on different types of events
 17 at homes or at our monthly meeting where Pinnacle,
 18 Chairman and Reagan members are invited to attend.
 19 We have had state candidates attend those
 20 meetings. We have had special guests attend those
 21 meetings. We have had local candidates attending those
 22 meetings -- those events, I'm sorry.
 23 And that's -- that's about it. I don't
 24 personally recollect any instance where a federal
 25 candidate, other than uncompetitive candidates, who are

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1 then there is a formal speaking period of time in which
 2 the special guest would be encouraged to speak.
 3 **Q. Does the RPSD ever impose any limits on what**
 4 **the donors are permitted to discuss with the candidates**
 5 **or officeholders who attend?**
 6 A. No.
 7 **Q. And did you say that federal House candidates**
 8 **have attended, but not actual members of the U.S. House?**
 9 A. That is correct.
 10 **Q. Do candidates for the House regularly attend?**
 11 A. I -- I don't recollect specifically if they
 12 regularly attend.
 13 **Q. How many federal candidates have attended these**
 14 **events?**
 15 A. Two.
 16 **Q. Is that going back to two --**
 17 A. Two in each of the election cycles. So usually
 18 the nominee in these uncompetitive districts would
 19 attend these events.
 20 **Q. Are they uncompetitive because they are**
 21 **considered safe Democratic seats?**
 22 A. Yes.
 23 **Q. The next sentence of the document refers to**
 24 **regular confidential updates on the party's progress in**
 25 **achieving its political plan directly from the chairman.**

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1 members of these clubs, or who were personally invited
 2 by the party, have attended, but no officeholder for a
 3 federal office has attended these.
 4 **Q. How frequent are these meetings?**
 5 A. The meetings are once a month. The special
 6 events, maximum, once a quarter. In the last year,
 7 during the campaign cycle, we did not have any special
 8 events.
 9 **Q. Let's put the monthly meetings aside for a**
 10 **moment and just about the special events.**
 11 **Besides donors and the candidates that you have**
 12 **mentioned, does anyone else attend these events?**
 13 A. Special guests.
 14 **Q. Are those special guests elected officials or**
 15 **candidates?**
 16 A. Yes.
 17 **Q. Are they ever federal candidates?**
 18 A. No.
 19 **Q. Do the guests and candidates speak with the**
 20 **donors who are at these events?**
 21 A. Do the guests and candidates speak with donors?
 22 The guests are usually donors.
 23 **Q. I meant the special guests that I believe you**
 24 **referred to in your last answer.**
 25 A. Oh, there is a social interaction period, and

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1 **Do you see where I am reading that?**
 2 A. Yes.
 3 **Q. Okay. Could you describe those briefings,**
 4 **please.**
 5 A. The chairman would usually talk about specific
 6 activities that are -- that are occurring within the
 7 county or within the state in support of our candidates.
 8 **Q. Any particular candidates?**
 9 A. Mostly our interaction, our activities, have
 10 had to do with local candidates, so it would be with
 11 council races, mayors' races, Assembly races. I can't
 12 even think of a Senate race in which we have talked
 13 about strategic information. It mostly entails
 14 discussion about voter registration and, you know,
 15 certain other campaign kinds of general stuff.
 16 **Q. Are these in-person briefings, or are they over**
 17 **the phone?**
 18 A. The chairman is usually there. The chairman is
 19 usually giving the briefing.
 20 **Q. In person?**
 21 A. Yes.
 22 **Q. So this is an actual physical meeting where**
 23 **this happens?**
 24 A. This is in conjunction with the event.
 25 **Q. With the same event we were discussing earlier?**

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1 A. Yes. Well, what event were we discussing
 2 earlier? We were actually discussing multiple, so I
 3 should say I don't understand the question.
 4 **Q. Sure. The prior sentence in the document that**
 5 **we were looking at refers to complimentary VIP meetings**
 6 **and events, and we were discussing some of those events.**
 7 A. Yes.
 8 **Q. Are the briefings -- I'm sorry, the regular**
 9 **confidential updates, are those done in conjunction with**
 10 **the same events?**
 11 A. Yes, and also through a direct mail update from
 12 the chairman.
 13 **Q. So the attendees are the same donors who are**
 14 **otherwise at these events?**
 15 A. Yes.
 16 **Q. What are the additional briefings that are**
 17 **referred to on the last line of the page?**
 18 A. Usually they are dissemination of state party
 19 strategic plan in the campaign relating to elections in
 20 the region.
 21 **Q. Is that something -- when you mentioned state**
 22 **party, is that something created by the CRP?**
 23 A. It's -- yeah.
 24 **Q. How does the RPSD get that state party plan**
 25 **from the CRP?**

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1 that the meeting was running effectively.
 2 **Q. So the additional briefings mentioned at the**
 3 **bottom of the first page of the document, those are**
 4 **through mail and e-mail?**
 5 A. Primarily -- yes. Primarily.
 6 **Q. What other ways are they given?**
 7 A. To donors? In the same type of events that we
 8 would hold.
 9 **Q. If you can hold onto that document.**
 10 A. Sure.
 11 MR. NOTI: But I'd like to ask that this be
 12 marked as the next exhibit, please.
 13 (Exhibit D was marked for
 14 identification.)
 15 BY MR. NOTI:
 16 **Q. Are you familiar with this document?**
 17 A. Somewhat, yes.
 18 **Q. What is it?**
 19 A. It is a description of the Chairman's Circle
 20 Club.
 21 **Q. And it's from your Web site, correct?**
 22 A. Yes.
 23 **Q. Directing your attention to the second**
 24 **paragraph in the middle column, above where the bullet**
 25 **points start, it reads: "Chairman's Circle members have**

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1 A. Strategic information is delivered to the
 2 county party through e-mail, through briefings, and then
 3 the chairman of the county party would digest it and
 4 configure it in a way that made a compelling
 5 presentation.
 6 **Q. For the donors?**
 7 A. For the donors, yes.
 8 **Q. Does national strategic information come down**
 9 **from the RNC?**
 10 A. I don't know. I don't recollect any instances
 11 where I have seen any PowerPoint presentations that had
 12 RNC on them or any letters that had RNC on them.
 13 **Q. What about less formally, through phone calls**
 14 **or e-mails or something of that sort?**
 15 A. I do recall conference call updates on
 16 campaigns from -- I'm not sure if they were RNC folks,
 17 though, but I do remember they were not -- they were not
 18 state campaigns. I think they were federal campaigns.
 19 **Q. Are you referring to specific events or**
 20 **specific phone calls or e-mails?**
 21 A. I can vaguely remember one conference call, and
 22 I can't even remember the name of the -- of the
 23 individual giving it. Nelson is the only thing that
 24 comes to mind. But my job was not to necessarily be
 25 listening intently to the call. It was to make sure

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1 **also participated in numerous exclusive VIP junkets to**
 2 **our nation's capitol, including a special trip for**
 3 **President Bush's 2005 inauguration."**
 4 **Could you explain these junkets, please.**
 5 A. I was not the author of this. I specifically
 6 recall we gave our Chairman's Circle members the
 7 opportunity to join us, traveling back to Washington,
 8 D.C., to participate in viewing the inauguration of the
 9 president. We had a couple of exclusive dinners and
 10 then members with access to the presidential balls
 11 were -- would attend them if they wished.
 12 **Q. Who attended the dinners?**
 13 A. In this particular case, I believe each of the
 14 members of our congressional delegation attended the
 15 dinners.
 16 **Q. Did they dine with the donors?**
 17 A. I believe that -- you know, I honestly don't
 18 recall. I think that they did, but I'm not positive
 19 whether they just dropped by to say hi.
 20 **Q. And when you say "our congressional**
 21 **delegation," do you mean all of California or just the**
 22 **San Diego County?**
 23 A. I seem to recall Congressman Issa and
 24 Cunningham, but I don't recall any others. There may
 25 have been -- oh, what's his name? Rohrabacher may have

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1 attended it as well, but I honestly can't recall for
 2 sure.

3 **Q. Were there any other portions of that trip**
 4 **where the donors had an opportunity to interact with**
 5 **federal candidates or officeholders?**

6 A. Not under the control of the party.

7 **Q. You are referring to the balls, right?**

8 A. Yeah. You know, they -- members of the club
 9 could, on their own, visit any member of Congress that
 10 was willing to receive them.

11 **Q. Did the RPSD facilitate any meetings along**
 12 **those lines?**

13 A. Not to my knowledge.

14 **Q. Just as a global matter, when you say "not to**
 15 **my knowledge," you understand that -- do you understand**
 16 **that you are here to testify not just as to what you**
 17 **personally know, but on behalf of the entire RPSD?**

18 A. I understand that. But if I don't know, I
 19 don't know.

20 It should be noted that this particular event
 21 and a previous event were not fundraising vehicles.
 22 They were part of the benefits of being a club member,
 23 and you had to pay for the event yourself.

24 **Q. Other than the trip involving the 2005**
 25 **inauguration, what other -- and I am just quoting the**

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1 A. Involving federal candidates, none. Candidates
 2 or officeholders.

3 **Q. What about --**

4 A. Involving trips to D.C.? None.

5 **Q. So just those two?**

6 A. Yes.

7 **Q. And there haven't been any other, regardless of**
 8 **whether it was in D.C. or not, there haven't been any**
 9 **others where the donors had a chance to meet with or**
 10 **interact with federal candidates or officeholders?**

11 A. That is correct.

12 **Q. Is the RPSD planning any similar trips**
 13 **currently?**

14 A. To my knowledge, no, but it is something that
 15 the committee wishes to do to offer benefits to our
 16 donors.

17 **Q. You can put the most recent document aside.**

18 A. Okay.

19 **Q. Turning back to the prior exhibit on the second**
 20 **page under "Reagan Club" --**

21 A. Yes.

22 **Q. -- the second paragraph of that description**
 23 **refers to complimentary events?**

24 A. Yes.

25 **Q. What events is that referring to?**

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1 **document -- exclusive VIP junkets have there been for**
 2 **Chairman's Circle member?**

3 A. In September of 2004, Chairman's Circle members
 4 were invited to travel back to Washington, D.C., and the
 5 party had arranged for a meeting with Senator George
 6 Allen and, I believe, former Attorney General Edwin
 7 Meese, but I'm not positive.

8 **Q. So on that trip, were there any other**
 9 **opportunities besides the meeting with Senator Allen for**
 10 **the donors to interact with federal candidates or**
 11 **officeholders?**

12 A. In a formalized way, not to my knowledge.

13 **Q. Anything that the RPSD facilitated or**
 14 **organized?**

15 A. A tour of the capitol, I believe. I'm not
 16 certain about the White House.

17 **Q. Did the tour of the capitol involve meeting**
 18 **with members of Congress?**

19 A. It may have. I don't have any direct knowledge
 20 of that trip because it had already been planned at the
 21 time that I came on board in July.

22 **Q. Other than the 2005 inauguration trip and the**
 23 **2004 trip to meet Senator Allen, have there been**
 24 **other -- what other exclusive VIP junkets have there**
 25 **been?**

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1 A. Reagan Club members -- oh, no, so Reagan Club
 2 members, Chairman's Circle members and Pinnacle members
 3 were all invited to attend several group trips including
 4 the Ronald Reagan Presidential Library and a tour,
 5 complimentary tour, of the U.S.S. Midway Museum here in
 6 San Diego.

7 **Q. Are those the only -- those two events are**
 8 **listed in the description. Have there been others?**

9 A. We did return back to the Reagan Library.
 10 Actually annually we have returned back to the Reagan
 11 Library and invited all those individuals, but there
 12 have been none others. No others.

13 **Q. And have -- did any of those events -- did any**
 14 **federal candidate or officeholder attend any portion of**
 15 **those events?**

16 A. No.

17 **Q. The last sentence of the same paragraph refers**
 18 **to major Republican party events. Do you see that?**

19 A. Yes. Those would be our two annual fundraising
 20 events that we previously discussed. Reagan Club
 21 members would get a reduced price or complimentary. And
 22 then our Chairman's Circle members and above would be
 23 invited, complimentary.

24 **Q. Looking down to the next membership level,**
 25 **which is the Century Club?**

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1 A. Yes.

2 **Q. The description refers to the opportunity to**

3 **meet Republican leaders at complimentary events held**

4 **prior to our party's monthly -- excuse me. Wait. It**

5 **should say regular monthly meetings and presentation.**

6 A. Thank you for identifying that spelling error.

7 I'll make the executive director know about it.

8 **Q. What Republican leaders is this referring to?**

9 A. Any Republican leader that attended our monthly

10 meetings, which could be anyone.

11 **Q. It could be federal or state candidates or**

12 **officeholders?**

13 A. Yes.

14 **Q. At the monthly meetings -- well, what happens**

15 **in general at the monthly meetings?**

16 A. The monthly meeting is structured as a

17 quasi-regular meeting in which certain committee

18 business is executed during the meeting. The acceptance

19 of the previous meeting's minutes, acceptance of the

20 agenda, a chairman's report, and then a special guest

21 would speak, which could be anyone from a federal

22 candidate to a pollster, or an advocate of a

23 proposition. It could be multiple individuals speaking

24 at that meeting.

25 And then after that presentation, if the

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1 **Q. And do they interact with the donors at the VIP**

2 **reception?**

3 A. Sure.

4 **Q. I am just going to ask a couple more questions,**

5 **and then we can take a break if you'd like.**

6 **As a general matter, why do you have these**

7 **membership levels?**

8 A. Well, the county party has been continuously

9 looking to find ways in which it can maintain a regular

10 revenue stream to pay for its operation and programs.

11 Primarily we -- we fund those through our direct mail

12 activities which occur four to six times per year,

13 direct mail letters, solicitations, and through the

14 club -- yeah, through the clubs.

15 **Q. So does having these membership levels help the**

16 **RPSD raise money?**

17 A. Does it help? That's a subjective question.

18 Sure.

19 **Q. Has the RPSD ever quantified the effect of**

20 **having these levels?**

21 A. We have -- I think we have been able to define

22 who becomes a Century Club member and a Reagan Club

23 member and a Chairman's Circle member, but that's --

24 that's about it. We have been able to quantify it

25 financially. It accounts for 100- to 300,000 dollars of

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1 committee needed to enter into committee business,

2 discussion and a vote, the meeting would recess for a

3 short period of time and then reconvene after the public

4 had departed.

5 **Q. And by "public" are you referring to the**

6 **donors?**

7 A. Anyone is invited. Primarily -- well, we -- we

8 actively encourage or donors and our activists to attend

9 the monthly meetings and remain involved in the party's

10 activities.

11 **Q. And if a candidate or officeholder attends, do**

12 **the members of the public, including the donors, have an**

13 **opportunity to speak with the candidate or officeholder**

14 **directly?**

15 A. Yes. We have a VIP reception, and we have a

16 regular reception.

17 **Q. And who attends the VIP reception?**

18 A. VIP reception is a benefit for Reagan Club and

19 above. Regular reception is a benefit for -- actually

20 for all -- all the public.

21 **Q. And the candidate or officeholder, if there is**

22 **one, do they attend the VIP reception?**

23 A. If they wish, yes.

24 **Q. Sometimes?**

25 A. Yes.

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1 our annual budget, fundraising.

2 **Q. As a general matter, who becomes each of the --**

3 A. Century Club members are usually individuals

4 who are very fanatic about the Republican philosophy.

5 Reagan Club members are very much the same. And then

6 there is a transition.

7 Our Chairman's Circle members are usually more

8 interested in local matters, interested in council

9 races, council members, interested in making sure

10 that -- that the -- the philosophies of the Republican

11 party are addressed in those races, so they are more

12 interested in local kinds of things.

13 **Q. Besides the benefits that we have discussed, do**

14 **you provide any other benefits to your donors?**

15 A. No.

16 **Q. Would you like to take a break?**

17 A. Do you want to take a break? I'm fine for

18 another 10 minutes.

19 MR. BABER: How much longer do you think you'll

20 go?

21 MR. NOTI: Can we go off the record.

22 (Discussion off the record)

23 MR. NOTI: Back on the record.

24 BY MR. NOTI:

25 **Q. Do corporations have membership levels like**

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1 individuals?
 2 A. There is no distinction between the two.
 3 Q. In terms of membership levels, there is no
 4 distinction?
 5 A. Yes.
 6 Q. Is that true even for corporations that give
 7 tens of thousands of dollars?
 8 A. I don't understand the question.
 9 Q. I mean, does a corporation that gives five
 10 figures get the same thing as a corporation that gives a
 11 thousand?
 12 A. The corporation itself doesn't -- doesn't
 13 actually join the member club. The individual
 14 representing the corporation does.
 15 Q. Does that person join on behalf of the
 16 corporation?
 17 A. Usually it depends.
 18 Q. Well, I guess what I am asking is if John
 19 Smith, CEO of the corporation, gives a thousand dollars
 20 from his own bank account --
 21 A. It's John Smith.
 22 Q. Right. Versus if he gives a check for a
 23 thousand dollars drawn upon the treasury of the
 24 corporation.
 25 A. It's John Smith.

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1 who give even more money?
 2 A. Because the organization rarely receives
 3 donations greater than 5,000 from individuals.
 4 Q. Do individual donors ever contact the RPSD with
 5 requests?
 6 A. What type of request?
 7 Q. Let's start with any type of request.
 8 A. Sure, yes.
 9 Q. What do they request?
 10 A. They request to -- a phone number for the
 11 chairman or a meeting with the chairman.
 12 Q. Do they ever request meetings with federal
 13 officeholders or candidates?
 14 A. I have never experienced a call such as that.
 15 Q. Have you ever heard of a call such as that?
 16 A. No.
 17 Q. What about state officeholders or candidates?
 18 A. No.
 19 Q. If someone -- if a donor did call and ask for a
 20 meeting with a federal officeholder or candidate, what
 21 would the RPSD do?
 22 A. I would give them the phone number that I have
 23 for their office.
 24 Q. Is that a publicly available phone number?
 25 A. Yes. I don't have any privately available

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1 Q. There's no distinction between corporate
 2 income, corporate donations, and individual donations
 3 for purposes of the membership levels?
 4 A. No.
 5 Q. Logistically, how do the benefits for
 6 corporations work if -- if one of the benefits is an
 7 invitation to an event, who from the corporation gets
 8 invited?
 9 A. John Smith.
 10 Q. So you don't send notification to the
 11 corporation saying you have two tickets for this event,
 12 send whoever you want?
 13 A. If the corporation is a sponsor, we indicate to
 14 the contact there, which is usually John Smith, that
 15 they have available to them a number of tickets that
 16 they can distribute as they wish.
 17 Q. Are there any other membership levels besides
 18 the ones listed on the documents that we looked at?
 19 A. No.
 20 Q. What about for donations of \$10,000 a year?
 21 A. No.
 22 Q. Why not?
 23 A. Because Pinnacle is the top club for
 24 individuals of donations of 5,000 or more.
 25 Q. Why not provide additional benefits for folks

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1 phone numbers.
 2 Q. Would the response depend upon how big a donor
 3 was making a request?
 4 A. No.
 5 Q. Has the RPSD ever helped a donor gain access to
 6 a federal candidate or officeholder other than through
 7 the events that we have already discussed?
 8 A. No.
 9 Q. Why not?
 10 A. We don't engage in a great deal of interaction
 11 with our federal officers or our state officers. They
 12 don't really have a great deal of interest in what the
 13 county party does.
 14 Q. So are you saying that -- to put it somewhat
 15 crudely, are you saying that the RPSD doesn't have
 16 enough pull to make a meeting like that happen?
 17 A. Yes.
 18 Q. Does the RPSD have a policy against helping a
 19 donor gain access to a federal candidate or
 20 officeholder?
 21 A. No.
 22 Q. Would that change if you won this lawsuit?
 23 A. Not that I know of, no.
 24 Q. How does the RPSD decide what activities to
 25 spend its money on?

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1 A. We -- depending upon what it is, we consult
 2 with our endorsed candidates. The county party engages
 3 in something called member communications, which is a
 4 state activity where we are entitled to speak to
 5 Republicans in mail or e-mail, and we coordinate
 6 actively with state and local candidates to that end.
 7 **Q. When you mentioned consulting with endorsed
 8 candidates, does that include federal candidates?**
 9 A. No.
 10 **Q. How do you decide -- when the RPSD makes a
 11 disbursement, how do you decide which account it comes
 12 out of?**
 13 A. The assistant treasurer will ask me questions
 14 about what the expenditure is for and make a decision
 15 based on her understanding of state and federal law.
 16 **Q. If a disbursement could be funded with either
 17 federal or non-federal dollars, which do you use?**
 18 A. I don't exactly understand the question.
 19 **Q. If you're spending money on activity, and it's
 20 legal to use either federal or non-federal dollars for
 21 that activity, which would you use?**
 22 A. Those dollars which are more abundant.
 23 **Q. Is one or the other generally more abundant?**
 24 A. State dollars.
 25 **Q. When you make a disbursement, what information**

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1 or federal law?
 2 A. The assistant treasurer, well, in consultation
 3 with myself and counsel.
 4 **Q. Earlier you mentioned income and expenditure
 5 reports or income and expense reports. Do those reports
 6 contain information about specific disbursements?**
 7 A. No.
 8 **Q. What about categories of disbursements?**
 9 A. No.
 10 **Q. It's just aggregate totals?**
 11 A. Yeah.
 12 **Q. Is there any other internal circulation of
 13 disbursement information within the RPSD?**
 14 A. No.
 15 **Q. What about external distribution of
 16 disbursement information?**
 17 A. No. Other than is required by law.
 18 **Q. Has anyone outside the RPSD ever asked for,
 19 other than government agencies, asked for information
 20 about your disbursements?**
 21 A. No.
 22 **Q. Have any federal candidates or federal
 23 officeholders asked for your disbursement information?**
 24 A. No.
 25 **Q. Have you ever conducted an analysis of the**

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1 **do you record about it?**
 2 A. Staff creates a check request signed by the
 3 chairman, delivered to our accountant, who cuts a check
 4 which is delivered to the vendor that we are paying.
 5 **Q. So what information gets reported about that
 6 transaction?**
 7 A. I am trying to think of an instance.
 8 **Q. Let me rephrase the question. You are required
 9 by law to record and disclose certain information for
 10 each transaction, who it goes to, that kind of thing.**
 11 **Other than what you are required to disclose by
 12 law, is there any other information about a disbursement
 13 that gets kept?**
 14 A. Not that I am aware of.
 15 **Q. What format do you keep your spending records
 16 in?**
 17 A. Our accountant keeps them in the QuickBooks
 18 format as to who is paid and the amount, and then for
 19 reporting purposes in other software application, titles
 20 I don't know.
 21 **Q. And who is responsible for compiling and
 22 maintaining those records?**
 23 A. The assistant treasurer.
 24 **Q. Who is responsible for ensuring that any
 25 particular disbursement complies with the relevant state**

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1 **effect of a particular disbursement or set of
 2 disbursements on an election?**
 3 A. I don't understand the question.
 4 **Q. Have you ever, for example, conducted analysis
 5 of we spent \$10,000 on GOTV and that resulted in such
 6 and such increase in Republican turnout?**
 7 A. Not that example specifically, but yes.
 8 **Q. What types of analysis have you conducted?**
 9 A. We have conducted -- well, we have reported or
 10 conducted an analysis of a number of registrations that
 11 we have been able to -- voter registration that's we
 12 have been able to accumulate in a given period of time
 13 for the sake of understanding where our voter
 14 registration is occurring.
 15 **Q. Any other similar analyses?**
 16 A. As I recollect, we conducted an analysis based
 17 on targeting certain precincts, female voters in certain
 18 precincts in conjunction with an organization interested
 19 in increasing female voter turnout. It's a small
 20 project.
 21 **Q. Any other similar analyses?**
 22 A. Not that I can recall.
 23 **Q. What about any analysis in relation to a
 24 particular election? Anything about somebody who got
 25 elected who wouldn't have been elected but for your**

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1 **efforts, that kind of thing?**
 2 A. As I recall, there was a poll that discussed --
 3 what would you call it? Voter allegiance to certain
 4 organizations, and we determined that when the
 5 Republican party and endorsement from the Republican
 6 party was noted, it was -- it had a positive response
 7 with Republican voters, greater than firefighters,
 8 police, teachers union, Sierra Club, and we disseminated
 9 that to our activists and donors, that information, so
 10 that they were aware that what they do is important.
 11 **Q. Was that tied to any particular election?**
 12 A. No.
 13 **Q. Have you ever analyzed the effect of any of**
 14 **your activities specifically on a particular federal**
 15 **election?**
 16 A. No.
 17 **Q. What about federal elections in general?**
 18 A. No.
 19 **Q. What are the RPSD's voter registration**
 20 **activities?**
 21 A. We have had an ongoing program over the last
 22 several years that has generated several thousand voter
 23 registrations. At certain times in the year the program
 24 would die off, specifically after elections. And when
 25 our bounty program was not funding, because of either a

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1 transition between state dollars and federal dollars or
 2 just a lack of funding available for the program. But
 3 it's been ongoing for as long as I have been an
 4 executive director of the party.
 5 **Q. And on the micro level, what does voter**
 6 **registration consist of on the actual level of**
 7 **registering people?**
 8 A. Attending events in which we encourage folks to
 9 register as Republicans.
 10 **Q. And how do you encourage them to do that? Do**
 11 **you set up a table, a booth?**
 12 A. Yes.
 13 **Q. What types of events?**
 14 A. Street fairs, immigration activities, in front
 15 of shopping centers.
 16 **Q. Who actually performs the activities that --**
 17 A. It's a combination. Volunteers and paid
 18 vendors.
 19 **Q. When did you conduct these voter registration**
 20 **activities?**
 21 A. Continuously.
 22 **Q. And who do you try to register?**
 23 A. Anyone who is a U.S. citizen over the age of
 24 18.
 25 **Q. Without regard to party preference?**

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1 A. We encourage them to register as Republican.
 2 **Q. What's the goal of the voter registration**
 3 **activities?**
 4 A. To increase voter participation in the
 5 political process.
 6 **Q. Is that the only goal?**
 7 A. Uh-huh.
 8 **Q. There is no goals relating to helping**
 9 **Republican candidates do better in elections?**
 10 A. It's to increase Republican participation in
 11 elections.
 12 **Q. What's the goal of increasing Republican**
 13 **participation in elections?**
 14 A. To get Republicans elected.
 15 **Q. Does that include state and federal elections?**
 16 A. It includes Republicans, all Republicans.
 17 **Q. State and federal?**
 18 A. Yeah.
 19 **Q. How do you decide which account to use to pay**
 20 **for voter registration activities?**
 21 A. It depends upon the law and the time in
 22 which -- the time of year in which voter registration is
 23 occurring.
 24 **Q. Can you explain the last part of your answer**
 25 **about the time of year?**

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1 A. It's my understanding that a certain number of
 2 days prior to a federal election, that type of activity
 3 cannot occur unless it is paid for with individual
 4 dollars, individual private donations.
 5 **Q. Federal, federal money?**
 6 A. Yes.
 7 **Q. What are the RPSD's -- strike that.**
 8 **The terms of voter identification and GOTV have**
 9 **been used in some of your documents, apparently**
 10 **interchangeably. Is it accurate to say that voter**
 11 **identification is simply a part of GOTV, or are they two**
 12 **separate activities?**
 13 A. Can you restate the question? I'm not sure I
 14 understand it fully.
 15 **Q. Is voter identification a distinct activity**
 16 **from GOTV, or is it part of GOTV?**
 17 A. It's a distinct activity.
 18 **Q. Okay. What does voter identification consist**
 19 **of?**
 20 A. Identifying the preferences of voters.
 21 **Q. And how do you go about doing that?**
 22 A. Contacting them and surveying them.
 23 **Q. And what do you ask them?**
 24 A. Questions about their preferences.
 25 **Q. What types of preferences?**

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1 A. If they support or do not support taxes, that
 2 type of --
 3 **Q. Do you ever ask them who they are going to vote
 4 for?**
 5 A. At some point in time, yes.
 6 **Q. Do you ever ask them who they are going to vote
 7 for in a particular state election?**
 8 A. Yes.
 9 **Q. What about in a particular federal election?**
 10 A. The county party? Not that I recollect. Our
 11 telephone operations, for the most part, are executed
 12 through the -- our Victory campaign. Our county party
 13 doesn't have an active telephone operation.
 14 **Q. And the Victory campaign, is that a CRP
 15 activity?**
 16 A. Yes. In that instance we coordinate with the
 17 CRP.
 18 **Q. And they pass along to you the information that
 19 they get through the phone contacts?**
 20 A. Very little.
 21 **Q. Very little information?**
 22 A. Yes.
 23 **Q. What do you do with the information you get
 24 from the voter identification?**
 25 A. Usually if we get information about voter

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1 counterproductive?
 2 A. Yes.
 3 **Q. What's the goal of the GOTV activity?**
 4 A. To encourage as many as Republican voters to go
 5 out to the polls and vote Republican as possible.
 6 **Q. And what's the goal of that?**
 7 A. To get Republicans elected.
 8 **Q. State and federal?**
 9 A. All Republicans.
 10 **Q. If there is an election where they are state
 11 and federal elections on the ballot, could you do --
 12 would it be possible to do GOTV and only influence the
 13 state election and not the federal election?**
 14 A. Sure.
 15 **Q. How would you do that?**
 16 A. I suppose by not having federal candidates on
 17 our door hanger.
 18 **Q. Do you consider door hangers GOTV activity?**
 19 A. Uh-huh.
 20 **Q. In terms of precinct walking, getting
 21 Republicans to the polls, is there any way to do that in
 22 an election where there are state and federal elections
 23 on the ballot without influencing the federal election?**
 24 A. Sure, if we didn't have federal candidates on
 25 our door hanger.

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1 identification, it's after the election is over and
 2 it's -- we apply it to our voter file so that we can
 3 talk to certain types of voters. Usually we have to ask
 4 the CRP if they are willing to give us that information.
 5 **Q. Which information are you referring to?**
 6 A. Voter preference information.
 7 **Q. What do your GOTV activities consist of?**
 8 A. We have an active precinct, volunteer precinct
 9 program in which we recruit volunteers to walk their
 10 neighborhoods.
 11 **Q. And do what?**
 12 A. Go to Republican households and encourage them
 13 to get out to vote.
 14 **Q. Is that on election day or before or both?**
 15 A. It is before and on election day.
 16 **Q. If you don't get the voter preference
 17 information until after the election, how do you know
 18 who to GOTV?**
 19 A. We are only talking to Republicans, and we talk
 20 to as many as we possibly can.
 21 **Q. Why do you only GOTV Republicans?**
 22 A. Because we do not believe there is any point in
 23 talking to those that have self-identified affiliating
 24 with another party.
 25 **Q. There isn't any point or it's**

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1 **Q. No, putting aside the door hanger, just the
 2 precinct walking, getting people to the polls, asking
 3 Republicans to go to the polls, would that -- in an
 4 election where there is federal and state candidates on
 5 the ballots, would that necessarily affect both types of
 6 elections?**
 7 A. I assume that it would affect both elections if
 8 we are able to generate more Republicans getting out to
 9 vote.
 10 **Q. You mentioned that door hangers are a part of
 11 your GOTV activity?**
 12 A. Yes.
 13 **Q. So the door hangers are intended to get folks
 14 to the polls; is that correct?**
 15 A. Yes.
 16 **Q. Okay. And so to the extent that a door hanger,
 17 regardless of whether it mentioned a federal candidate,
 18 actually got more Republicans to the polls, it would
 19 influence any partisan elections that were on the
 20 ballot, correct?**
 21 A. It is our hope that it would, yes.
 22 **Q. In 2008, when you did GOTV, was that intended,
 23 in part, to help Senator McCain?**
 24 A. Yes.
 25 **Q. What has the RPSD done in relation to state**

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1 **ballot initiatives and propositions?**
 2 A. We have actively supported local measures and
 3 state measures.
 4 **Q. What does active support consist of?**
 5 A. Endorsing them, placing them on our door
 6 hanger, our supporter opposition.
 7 **Q. Anything else besides what you just mentioned?**
 8 A. We have placed our position on some
 9 propositions in mail that also advocates support of
 10 local candidates or state candidates.
 11 **Q. What about other forms of advertising other**
 12 **than mail? Have you done any of that in relation to**
 13 **ballot initiatives or propositions?**
 14 A. E-mail.
 15 **Q. Who have those e-mails gone to?**
 16 A. E-mail and also automated calls.
 17 **Q. Who have the e-mails gone to?**
 18 A. Individuals identified -- self-identified as
 19 Republican voters.
 20 **Q. And who have the robo-calls gone to?**
 21 A. Individuals self-identified as Republican
 22 voters.
 23 **Q. Republican voters?**
 24 A. Sorry. Yes.
 25 **Q. Besides the mail, the e-mail and the calls,**

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1 **have you conducted any other activities in relation to**
 2 **ballot initiatives?**
 3 A. We advertise ballot incentives on our Web site,
 4 along with candidates.
 5 **Q. Anything else?**
 6 A. Not that I can recall.
 7 **Q. Have any of those activities, the e-mail, the**
 8 **calls, the Web site, the mail, the door hangers, also**
 9 **referred to federal candidates?**
 10 A. I don't understand your question.
 11 **Q. In any communication that you have made**
 12 **regarding supporting or opposing a ballot initiative,**
 13 **have you also referred to any federal candidates?**
 14 A. In relation to the ballot initiative?
 15 **Q. No. Whether in relation to the ballot**
 16 **initiative or otherwise.**
 17 A. Just support or oppose a federal candidate?
 18 **Q. No, just mentioning a federal candidate.**
 19 A. Yes.
 20 **Q. What communications?**
 21 A. Our door hanger.
 22 **Q. Which presumably has the RPSD's position on the**
 23 **ballot initiative and says support our Republican**
 24 **federal candidates, something like that?**
 25 A. It says "Support Our Republican Candidates."

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1 It does not say -- it does not specifically delineate.
 2 **Q. But it includes candidates for the U.S. House?**
 3 A. The door hanger does, yes.
 4 **Q. Other than door hangers, have there been any**
 5 **communications about ballot initiatives that also**
 6 **referred to federal candidates?**
 7 A. No.
 8 **Q. Are you familiar with the term PASO?**
 9 A. Somewhat familiar with, yes.
 10 **Q. It stands for promote, attack, support or**
 11 **oppose?**
 12 A. Yes.
 13 **Q. What's your understanding of the federal PASO**
 14 **provisions as they relate to your ballot initiative**
 15 **activities?**
 16 A. Clarify your question.
 17 **Q. What's your understanding of how the federal**
 18 **PASO provisions affect any of your activities in**
 19 **relation to ballot initiatives. I'm not asking for a**
 20 **legal conclusion, just as an operational matter.**
 21 A. What I know is that if we cite a federal
 22 candidate, regarding or in relationship to a local or
 23 state measure, it has to be paid for with federal
 24 dollars.
 25 **Q. Just mentioning the candidate regardless of**

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1 **whether --**
 2 A. To the best of my knowledge, that's how we
 3 approach it, yes.
 4 **Q. Regardless of whether the candidate is PASO'd**
 5 **in the communication?**
 6 A. To the best of my knowledge, that's correct.
 7 **Q. Other than activities relating to ballot**
 8 **initiatives, has the RPSD done anything since 2003 in**
 9 **relation to redistricting?**
 10 A. Restate the question.
 11 **Q. I know there have been ballot initiatives in**
 12 **California relating to redistricting.**
 13 A. Yes.
 14 **Q. Putting that those aside, has the RPSD**
 15 **conducted any activities in relation to state**
 16 **redistricting?**
 17 A. Just advocating or opposing.
 18 **Q. Advocating or opposing what?**
 19 A. Redistricting issues.
 20 **Q. So other than the initiatives, have there been**
 21 **other activities?**
 22 A. I don't understand the question.
 23 **Q. Just to be clear, there have been redistricting**
 24 **initiatives?**
 25 A. Yes.

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1 Q. And there is a redistricting process. Other
 2 than the specific initiatives about redistricting, has
 3 the RPSD done anything to affect, influence or otherwise
 4 relate to the redistricting process, such as talking to
 5 state legislators, anything along those lines?
 6 A. Not to my knowledge.
 7 MR. NOTI: I'd like to ask the court reporter
 8 to mark this as the next exhibit, please.
 9 (Exhibit E was marked for
 10 identification.)
 11 BY MR. NOTI:
 12 Q. Are you familiar with this document?
 13 A. Yes.
 14 Q. And what is it?
 15 A. It is the declaration of the current executive
 16 director of the county party.
 17 Q. In this case, correct?
 18 A. Sorry?
 19 Q. In this court case?
 20 A. Yes.
 21 Q. Okay. Would you please direct your attention
 22 to paragraphs 2 through 4. Do these paragraphs say that
 23 the RPSD has decided not to make member communication
 24 mailings about ballot initiatives that PASO federal
 25 candidates -- strike that.

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1 which took a position on a ballot initiative and
 2 supporting federal candidates, correct?
 3 A. That is correct, yes.
 4 Q. Other than door hangers, have there been any
 5 other public communications that did the same thing?
 6 A. No.
 7 Q. Why not?
 8 A. Because we would have had to pay for it
 9 entirely with federal dollars, and federal dollars are
 10 harder to come by.
 11 Q. So mentioning a federal candidate would have
 12 required you to use federal dollars?
 13 A. As we read it, yes. As we read the law.
 14 Q. If you look at Paragraph 5 of the document, the
 15 fifth line down, the sentence states: "This activity is
 16 prohibited by" and then there is a citation. What
 17 activity is being referred to there?
 18 A. It appears that voter identification and voter
 19 identifi- -- sorry, GOTV and voter registration.
 20 Q. Is it your understanding that GOTV, voter
 21 identification and voter registration are prohibited by
 22 federal law?
 23 A. During certain times without being paid for
 24 with federal funds.
 25 Q. The next sentence --

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1 I am not asking you to interpret the document.
 2 Has the RPSD decided not to make member communication
 3 mailings about ballot initiatives that PASO federal
 4 candidates?
 5 A. I still don't understand your question.
 6 Q. Paragraph 2, if you look at the first two
 7 sentences, says that the SDRP had endorsed ballot
 8 measures in member communication mailings and has
 9 considered whether to include in those communications
 10 statements that support or attack a federal candidate,
 11 but has decided not to do so.
 12 Do you see that?
 13 A. Yes.
 14 Q. Is that consistent with your understanding of
 15 the decisions the RPSD has made regarding its member
 16 communication mailings?
 17 A. Yes.
 18 Q. What about other types of mailings? Have you
 19 made other mailings that featured federal candidates?
 20 A. Not to my knowledge, no.
 21 Q. Have you ever made the types of mailings
 22 referred to in this paragraph about ballot initiatives
 23 that mention federal candidates but didn't PASO them?
 24 A. Mailings? No.
 25 Q. Okay. Now, we already discussed door hangers

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1 A. Did I say that correctly?
 2 Q. The next sentence says: "Absent the request of
 3 requested judicial relief SDRP will not engage in these
 4 activities."
 5 A. That is correct.
 6 Q. Does that mean that if you lose this lawsuit,
 7 you won't engage in GOTV, voter identification or voter
 8 registration activities?
 9 A. We will engage in it to the extent that federal
 10 dollars will allow us to.
 11 Q. Which is what you currently do, correct?
 12 A. Exactly.
 13 Q. You can put that document aside.
 14 MR. NOTI: Would you please mark this as the
 15 next exhibit.
 16 (Exhibit F was marked for
 17 identification.)
 18 BY MR. NOTI:
 19 Q. Are you familiar with this document?
 20 A. Yes.
 21 Q. What is it?
 22 A. It is the Declaration of Jonathan Buettner.
 23 Q. It's your declaration in this case, correct?
 24 A. Yes.
 25 Q. And you signed it?

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1 A. Yes.

2 **Q. Would you please look at Paragraph 11. This**

3 **paragraph.**

4 **Paragraph says that the SDRP has endorsed**

5 **hundreds of candidates for local offices on endorsement**

6 **mailings or party slate cards, and then a couple of**

7 **sentences later, "however, none of these endorsement**

8 **mailings included any federal candidates because of the**

9 **restrictions in BCRA." Do you see that?**

10 A. Yes.

11 **Q. Does that mean that the RPSD has not made any**

12 **endorsement mailings since 2003 that included any**

13 **federal candidates?**

14 A. That is, to the best of my knowledge, correct.

15 MR. NOTI: Would you please mark this as the

16 next exhibit.

17 (Exhibit G was marked for

18 identification.)

19 BY MR. NOTI:

20 **Q. Are you familiar with this document?**

21 A. Yes.

22 **Q. What is it?**

23 A. It is a PDF that is available on our Web site

24 for downloading purposes.

25 **Q. And what is it a PDF of?**

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1 **the first page?**

2 A. Yes.

3 **Q. And then the second page --**

4 A. A number of others.

5 **Q. Were there any documents similar to this that**

6 **the RPSD sent by mail?**

7 A. No.

8 **Q. What about by e-mail?**

9 A. Yes.

10 **Q. Was this document sent by e-mail?**

11 A. Yes.

12 **Q. So in Paragraph 11 of your declaration, when**

13 **you write that none of these endorsement mailings**

14 **included federal candidates, you are really talking**

15 **about --**

16 A. Postal mail.

17 **Q. But there have been e-mailed endorsement**

18 **mailings that did include federal candidates, true?**

19 A. Yes.

20 **Q. Correct?**

21 A. Yes.

22 **Q. In Paragraph 12 of your declaration, you write**

23 **that in 2006, 61 percent of the SDRP's expenditures were**

24 **for state and local candidate support; is that right?**

25 A. Yes.

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1 A. An official, what we call, a voter guide.

2 **Q. It's for the 2008 election, correct?**

3 A. Yes.

4 **Q. And the footer of the document states that it**

5 **is a, quote, "internal member communication paid for by**

6 **the Republican Party of San Diego County," close quote,**

7 **correct?**

8 A. Yes.

9 **Q. Is that an accurate statement about the**

10 **document?**

11 A. Yes.

12 **Q. Was this document ever distributed other than**

13 **by being posted on your Web site?**

14 A. Other than handed out by activists, no.

15 **Q. Was it handed out by activists?**

16 A. Activists were -- to my knowledge, activists

17 would download it and give it to their friends.

18 **Q. Do you consider this document part of your GOTV**

19 **efforts?**

20 A. We consider this an informational document.

21 **Q. Was it paid for with federal funds?**

22 A. The design was paid for with federal funds, as

23 far as I know.

24 **Q. And would you agree that it mentions seven**

25 **federal candidates and three non-federal candidates on**

78

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1 **Q. What was the remaining 39 percent of?**

2 A. Other programs of the party.

3 **Q. Such as what?**

4 A. Such as a donor club maintenance, equipment

5 purchases and the such.

6 **Q. Was any of it spent on federal candidate**

7 **support activities?**

8 A. No.

9 **Q. So all of the federal funds that you spent in**

10 **the 2006 election cycle were for state and local**

11 **activities?**

12 A. They were for get-out-the-vote activities

13 during that cycle.

14 **Q. And did the get-out-the-vote efforts include**

15 **documents or communications that refer to both state and**

16 **federal candidates?**

17 A. Other than our door hanger? As far as I know,

18 no.

19 **Q. Did the door hanger refer to state and federal**

20 **candidates?**

21 A. I believe so, yes.

22 **Q. I have the same question for 2004. The**

23 **declaration says that you spent 69 percent of your**

24 **expenditures in 2004 on state -- I assume it's supposed**

25 **to say "on state or local candidate support." Is that**

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1 what that's supposed to say? Your reference to 2004?

2 A. Yes, I believe you are correct.

3 Q. Okay. What was the other 31 percent spent on?

4 A. The same items as previously mentioned. Get

5 out the vote, maintenance, equipment purchase.

6 Q. And did the 2004 get-out-the-vote efforts

7 include door hangers or other communications that refer

8 to both state and federal candidates?

9 A. Door hangers.

10 Q. That's a yes?

11 A. Yes.

12 Q. And in 2008, the declaration refers to roughly

13 1.9 million out of roughly 2.7 being spent on state and

14 local candidate support. What did the other, roughly,

15 800,000 get spent on?

16 A. The same types of activities as I had

17 previously mentioned.

18 Q. What did the \$2,384 in federal campaign support

19 get spent on?

20 A. If I am not mistaken -- I don't know.

21 Q. Well, it's a very specific number. What --

22 A. Yes. Our assistant treasurer/accountant could

23 probably tell us exactly what it was the spent on. I

24 know that we spent \$550 on campaign collateral off of

25 the McCain campaign Web site. I am thinking that that

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1 A. A candidate may have been mentioned or I -- I

2 do not recollect. I'd have to consult with the -- our

3 records and our assistant treasurer.

4 Q. Well, what were the independent expenditures?

5 A. I don't recollect.

6 Q. How do you know that they were made?

7 A. Because in compiling this with the -- I did so

8 with the assistance of the assistant treasurer.

9 Q. Why, in general, would the RPSD spend money on

10 uncontested congressional races?

11 A. I don't remember the specific instance. Once I

12 understand it, I can probably explain, but I -- I'm

13 not -- I do not recollect the instances.

14 Q. Have there been other instances where the RPSD

15 made independent expenditures in connection with

16 uncontested congressional elections?

17 A. Not to my knowledge.

18 Q. In Paragraph 13 of the declaration, you write

19 that federal dollars, Levin funds, consist of dollars

20 that are also priced for local uses because the City of

21 San Diego prohibits the use of corporate and all

22 business entity dollars for --

23 A. Yes.

24 Q. -- for certain activities.

25 Is what you are saying in this paragraph that

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1 was attributed to the door hanger in which we had a

2 quote from then Senator McCain, but I am not certain.

3 Q. So the door hanger contained the same quote

4 that's on the PDF exhibit we looked at earlier?

5 A. Yes.

6 Q. Okay. If that is not where the other \$1,834

7 were spent -- that's 2,384 minus 550, if I am doing my

8 math right. Regardless, if that's not what the money

9 was spent, please inform your counsel so they can

10 correct that with us.

11 MR. BOPP: If you want us to follow up with

12 anything, what I told you before, you just have to let

13 us know. I don't want to do it in the middle of a

14 deposition. You just have to tell us. And there may be

15 other items, too, we have already discussed.

16 MR. NOTI: For this one, I am trying to make it

17 even easier. The witness has explained what he thinks

18 the money was spent on. I am saying if that is what it

19 was spent on, that's fine. If it was something else,

20 please let us know.

21 THE WITNESS: It's my understanding that's what

22 it was spent on.

23 BY MR. NOTI:

24 Q. Why did the RPSD make independent expenditures

25 on behalf of congressional candidates in safe seats?

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1 if you were allowed to use non-federal funds for GOTV

2 and voter registration, you could spend more city money

3 on city elections?

4 A. Yes. Can you clarify?

5 Q. Well, I'm just trying to clarify what the

6 declaration says. If you'd like to explain generally

7 what that paragraph is saying.

8 A. The party would like, but cannot, because we do

9 not receive enough, federal donations to give direct

10 support to local candidates.

11 Q. And there is some overlap between federal funds

12 and city funds?

13 A. City law prohibits the party from making direct

14 donations or independent expenditures on behalf of or

15 opposed to a candidate unless it's paid for with

16 individual dollars.

17 Q. So basically using corporate contributions for

18 GOTV and voter registration would free up individual

19 contributions to be used for city elections; is that

20 right?

21 A. Yes.

22 Q. Okay. Wouldn't it also then free up federal

23 dollars to be used for federal elections?

24 A. Sure, yes.

25 Q. You can put that document aside.

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1 MR. NOTI: Would you please mark this as the
 2 next exhibit.
 3 (Exhibit H was marked for
 4 identification.)
 5 BY MR. NOTI:
 6 **Q. Are you familiar this document?**
 7 A. Yes.
 8 **Q. What is it?**
 9 A. It is our 2000 and -- I'm not sure what year,
 10 six, I think, door hanger.
 11 **Q. And did you consider this part of your 2006**
 12 **GOTV efforts?**
 13 A. Yes.
 14 **Q. So would the expense for this have been**
 15 **included in our earlier discussion of the 2006 non --**
 16 **excuse me, the 2006 federal spending?**
 17 A. Do I discuss that?
 18 **Q. Did you pay for this with hard money?**
 19 A. That portion -- that portion is required by
 20 federal law. I think there was a balance paid for a
 21 certain amount with federal funds, a certain amount with
 22 state funds, because it was a GOTV activity.
 23 **Q. And this document was actually publicly**
 24 **distributed, right?**
 25 A. It was delivered to Republican households.

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1 **Q. You can put that document aside.**
 2 MR. NOTI: Would you please mark this as the
 3 next exhibit.
 4 (Exhibit I was marked for
 5 identification.)
 6 BY MR. NOTI:
 7 **Q. Are you familiar with this document?**
 8 A. I am familiar with the document.
 9 **Q. What is it?**
 10 A. A Complaint for Declaration and Injunctive
 11 Relief.
 12 **Q. It's the complaint in this lawsuit, right?**
 13 A. Yes.
 14 **Q. I only have one question about it. On Page 10,**
 15 **Paragraph 25 --**
 16 A. One second. I think I only read this once.
 17 Yes, I'm there.
 18 **Q. The first sentence states, "The CRP," which**
 19 **earlier in the document the term "CRP" is defined to**
 20 **include the RPSD, and I can point you to where that is**
 21 **if you are unsure of it. "The CRP also intends to use**
 22 **state funds for voter registration and voter**
 23 **identification and get-out-the-vote activities as well**
 24 **as," quote, 'generic campaign activity,' close quote,**
 25 **and then there is a citation.**

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1 **We have already talked about voter**
 2 **registration, voter identification and GOTV. What does**
 3 **generic campaign activity include?**
 4 A. I don't know.
 5 **Q. Well, if you win this lawsuit and you are**
 6 **permitted to spend non-federal funds on generic campaign**
 7 **activity, what activity would you like to spend them on?**
 8 A. I would assume that we would be spending it on
 9 recruitment of volunteers, generic campaign activity,
 10 voter registration activity, voter identification voter.
 11 **Q. Those are listed separately. I'm just trying**
 12 **to get at what you mean by generic campaign activity.**
 13 MR. BOPP: You know that counsel does help in
 14 drafting his complaint. That is a term of art in BCRA,
 15 and you are asking him whether or not he knows a legal
 16 term of art. Well, you are, because you haven't defined
 17 it for him, because that is legal term of art.
 18 BY MR. NOTI:
 19 **Q. What activities, without regard to the**
 20 **statutory definition, what activities would you conduct**
 21 **with non-federal funds if you were permitted to use**
 22 **non-federal funds for generic campaign activity?**
 23 MR. BOPP: The same objection to the question.
 24 You are asking for -- you are presenting him with a
 25 legal term of art and not defining it.

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1 You can go ahead and answer if you can.
 2 THE WITNESS: I don't know.
 3 BY MR. NOTI:
 4 **Q. Exhibit A.**
 5 A. Which one is that?
 6 MR. BOPP: To the complaint?
 7 BY MR. NOTI:
 8 **Q. No, Exhibit A in this deposition. I believe**
 9 **your counsel is holding the exhibit.**
 10 A. Okay. Now, I am looking at all accounts.
 11 MR. BOPP: Schedule A.
 12 BY MR. NOTI:
 13 **Q. Exhibit A, Schedule A, Page 2, "Matters for**
 14 **Examination," Paragraph 6. Just for the record, one of**
 15 **the topics for this deposition was the activities that**
 16 **the RPSD would like the finance with non-federal funds**
 17 **in the future.**
 18 MR. BOPP: Well, you can ask him that question,
 19 but that December 6 doesn't say generic campaign
 20 activity, so --
 21 BY MR. NOTI:
 22 **Q. Is generic campaign activity one of the**
 23 **activities you'd like to fund with non-federal funds in**
 24 **the future?**
 25 A. It depends upon what is defined by the term,

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1 generic campaign activity.
 2 **Q. The statute cited to you reads: Quote,**
 3 **"Campaign activity that promotes political party and**
 4 **does not promote a candidate or a non-federal**
 5 **candidate."**
 6 **Does that help you as to what sorts of generic**
 7 **campaign activity you'd like to conduct?**
 8 A. Other than promoting the party, no.
 9 **Q. Other than all of the activities that we have**
 10 **discussed, what else does the RPSD do to help federal**
 11 **candidates, federal candidates specifically, get**
 12 **elected?**
 13 A. To help them? Very little. For federal
 14 officeholders, nothing, virtually nothing. For
 15 candidates running in uncompetitive seats, we make
 16 available a voter file, which we have access to. And
 17 that's about it.
 18 **Q. Do you charge the candidates for access to the**
 19 **voter file?**
 20 A. No.
 21 **Q. What information is contained in the voter**
 22 **file?**
 23 A. Information about voters.
 24 **Q. Such as what?**
 25 A. Their registration, where they live, their
 89

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1 campaign organized it. So the answer then would be no.
 2 **Q. So the RPSD hasn't organized any rallies for**
 3 **federal candidates?**
 4 A. Not that I can recall.
 5 **Q. Has the RPSD ever transferred funds to other**
 6 **Republican party organizations?**
 7 A. What type of funds?
 8 **Q. Any funds.**
 9 A. We have transferred funds -- we have made
 10 donations to other county parties who have made
 11 donations to state candidates.
 12 **Q. Have you ever made a donation to another**
 13 **Republican party organization in order to affect a**
 14 **federal election?**
 15 A. No.
 16 **Q. In 2008, the CRP transferred funds to other**
 17 **state Republican entities, at least in part to help the**
 18 **McCain campaign. Has the RPSD ever done anything**
 19 **similar?**
 20 A. No.
 21 **Q. Has the RNC ever asked you to transfer funds to**
 22 **another Republican party organization?**
 23 A. No.
 24 **Q. Has the CRP ever asked you to transfer funds to**
 25 **another Republican party organization?**
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1 phone numbers, if they left their phone numbers, e-mail
 2 addresses.
 3 **Q. Is there any voter preference information?**
 4 A. No.
 5 **Q. Other than giving them access to the voter**
 6 **file, do you do anything else to help federal**
 7 **candidates?**
 8 A. No.
 9 **Q. Do you participate in any joint fundraising**
 10 **committees with either federal candidates or national**
 11 **Republican committees?**
 12 A. Not to my knowledge, no.
 13 **Q. Do you post fundraisers for federal candidates?**
 14 A. No.
 15 **Q. Do you organize fundraisers for federal**
 16 **candidates?**
 17 A. No.
 18 **Q. Do you organize rallies for federal candidates?**
 19 A. Yes.
 20 **Q. Which federal candidates have you organized**
 21 **rallies for?**
 22 A. I can remember specifically -- no, I take that
 23 back. We didn't organize that. We just participated in
 24 it. It was a rally for a presidential candidate in the
 25 primary. So we didn't actually organize it. Their
 90

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1 A. Federal? For federal purposes --
 2 **Q. No, no, no.**
 3 A. -- or just at all?
 4 **Q. At all.**
 5 A. No.
 6 **Q. Has any federal candidate, including their**
 7 **campaign organization, ever asked you to transfer funds**
 8 **to another Republican party organization?**
 9 A. Federal?
 10 **Q. Federal candidate.**
 11 A. No.
 12 **Q. So is there any -- other than what we have**
 13 **discussed, is there anything else that you have done**
 14 **since 2003 to help federal candidates get elected?**
 15 A. Not that I can think of.
 16 MR. NOTI: Would you please mark this as the
 17 next exhibit.
 18 (Exhibit J was marked for
 19 identification.)
 20 MR. NOTI: I'm sorry. Could I look at the
 21 document that you're holding?
 22 MR. BOPP: It's the rogs, I think.
 23 THE WITNESS: I don't know that I have ever --
 24 BY MR. NOTI:
 25 **Q. I apologize. Would you put that aside for now**
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1 and we'll come back to it. I handed you the wrong
 2 document.
 3 A. Okay.
 4 Q. We are going to get to that. It's just not --
 5 I apologize?
 6 MR. NOTI: Would you please mark this.
 7 (Exhibit K was marked for
 8 identification.)
 9 BY MR. NOTI:
 10 Q. Are you familiar with this document?
 11 A. I do not know that I am.
 12 Q. Okay. It's a document with this case's
 13 caption, and it's labeled "Plaintiff Republican Party of
 14 San Diego's Discovery Responses."
 15 If I could direct your attention to Page 4, the
 16 response to question No. 2. Just let me know when you
 17 have had a chance to read it.
 18 A. Okay.
 19 Q. The second sentence, the second part of the
 20 sentence, says: "RPSD attempts to be helpful to all
 21 Republicans and others to communicate with their federal
 22 elected officials regardless of their status as voters
 23 or RPSD contributors."
 24 What does "attempts to be helpful" mean in this
 25 context?

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1 A. Yes.
 2 Q. How are the fundraisers apprised of these
 3 things?
 4 A. Since I haven't read this, I am not certain I
 5 understand what it says.
 6 Q. Okay. Are RPSD's fundraisers apprised of
 7 bribery, extortion and other crimes?
 8 A. Is this a time when I ask for your description
 9 of this? Because I don't -- I don't understand it.
 10 Q. Well, okay. Putting aside the specific wording
 11 of the document for a second, are RPSD's fundraisers
 12 apprised of the laws concerning bribery, extortion and
 13 other crimes?
 14 A. Are we apprised -- I don't want to read -- or I
 15 don't want to say words -- put words in your mouth, but
 16 do we know what we can and cannot do when we are
 17 executing a fundraiser, what the law prohibits us from
 18 doing? Is that what you are asking? I would say yes.
 19 Q. How do the RPSD's fundraisers gain that
 20 information?
 21 A. Consultation with legal counsel, our assistant
 22 treasurer, and other documents that have been
 23 communicated to us by counsel, defining how we can
 24 execute our fundraisers.
 25 Q. Has the RPSD ever prepared its own documents

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1 A. If -- well, as previously stated, if an
 2 activist or a donor, anyone comes to the party and asks
 3 for a contact with a federal officeholder, we help them
 4 gain contact information, which is usually no more than
 5 the phone number for the local office.
 6 Q. And does the information that you provide
 7 differ based on whether the person is a big donor or not
 8 a donor?
 9 A. No.
 10 Q. What if it's a Republican versus a Democrat?
 11 A. No.
 12 Q. Why do you give the same assistance to a big
 13 donor as you would give to somebody who is not even a
 14 member of the party?
 15 A. Because we like to or attempt to help anyone
 16 that asks us for information. We don't necessarily know
 17 if they are a registered Republican or a Democrat.
 18 Q. If you did know that it was a big donor, would
 19 you make any effort to help them more?
 20 A. Other than a phone number? No.
 21 Q. The last sentence of the paragraph starts:
 22 "RPSD's paid and volunteer fundraisers are apprised of
 23 the laws concerning bribery, extortion and other crimes
 24 as part of their general knowledge."
 25 Do you see that?

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1 regarding the laws of bribery and extortion?
 2 A. Such as a policy? No.
 3 Q. What about as an informational document for
 4 fundraisers?
 5 A. Only disclaimers as prescribed by legal
 6 counsel.
 7 Q. What about people who aren't fundraisers? Are
 8 they made aware of these laws?
 9 A. I don't understand the question.
 10 Q. Does the RPSD make any effort to inform people
 11 who are not fundraisers of bribery, extortion or similar
 12 laws?
 13 A. Yes.
 14 Q. What efforts does the RPSD make?
 15 A. When an individual wishes to donate, we
 16 disclaim what their donation will be used for. In other
 17 words, we tell them that we -- you know, we cannot
 18 guarantee its use in anything that they may wish because
 19 we are prohibited from earmarking and designating funds
 20 as a donor wishes.
 21 Q. Do donors ever try to earmark their donations
 22 for specific purposes?
 23 A. I have never encountered an occasion.
 24 Q. So why do you disclaim that when you receive
 25 the donation? If a donor isn't asked --

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1 A. I'm not understanding.
 2 **Q. If a donor isn't asking for donations -- if**
 3 **donors never ask their donations be earmarked, why do**
 4 **you tell them that they can't earmark their donations?**
 5 A. As far as I know, it's -- to the best of my
 6 knowledge, it's been a practice; so I don't know if it's
 7 required by law, but it is a practice that we have
 8 adopted.
 9 **Q. Is that practice set out in any written policy?**
 10 A. None that I have read.
 11 **Q. The second half of the sentence says that the**
 12 **RPSD's paid and volunteer fundraisers are admonished not**
 13 **to promise or provide any donor with preferential access**
 14 **or assistance in gaining influence over federal**
 15 **officials. Do you see that?**
 16 A. Huh-huh.
 17 **Q. How are you they admonished of these things?**
 18 A. They are told not to do it.
 19 **Q. By whom are they told?**
 20 A. By myself, by the chairman, by whomever they
 21 are communicating in the process of executing the
 22 fundraising activity.
 23 **Q. And what specifically do you or whoever else**
 24 **who is doing the admonishment, what specifically do you**
 25 **tell the fundraisers?**

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1 **admonish your fundraisers not -- why do you admonish**
 2 **your fundraisers not to give something that they have**
 3 **never been asked for?**
 4 A. Because it's prohibited in the law.
 5 **Q. Is it your understanding that providing**
 6 **preferential access to a federal official in exchange**
 7 **for a donation is against the law?**
 8 A. It's my understanding that it's pretty much
 9 prohibited generally.
 10 **Q. If you were to win this case, would anything**
 11 **about the appraisals or the admonishments that we have**
 12 **discussed change?**
 13 A. No.
 14 **Q. You can put that document aside.**
 15 **Are there any federal officeholders who**
 16 **serve -- I'm sorry, who are members of the RPSD**
 17 **ex-officio?**
 18 A. Yes.
 19 **Q. Which ones?**
 20 A. Congressman Bilbray, Congressman Issa,
 21 Congressman Hunter.
 22 **Q. And that's because they are the members of the**
 23 **house from San Diego County?**
 24 A. Uh-huh. Yes. Sorry.
 25 **Q. Do you ever inform federal officeholders or**

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1 A. Essentially, that it's important not to promise
 2 funds be used in ways that a donor may wish them to be
 3 used. That the donation will be used as the party sees
 4 fit in accordance with the law.
 5 **Q. The statement is actually about promising to**
 6 **provide a donor with preferential access or --**
 7 **preferential access to or influence over federal**
 8 **officials. Are fundraisers admonished not to promise to**
 9 **provide any of those things?**
 10 A. Yes.
 11 **Q. By whom?**
 12 A. By the chairman or anyone interacting with
 13 them. We actively -- well, we have no relationship per
 14 se other than a casual relationship with our elected
 15 officials, so it's difficult for us to acquire any kind
 16 of preferential interaction.
 17 **Q. So what does the chairman specifically say when**
 18 **he or she is admonishing fundraisers not to promise to**
 19 **provide these things?**
 20 A. I don't know what the chairman says, but I
 21 indicate to our fundraisers that we should not provide
 22 any kind of specific access other than the fundraising
 23 activity to a donor. As I say, to my knowledge, I have
 24 never been asked for a preferential access.
 25 **Q. If you have never been asked, why do you**

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1 **candidates in advance of a strategy you are intending to**
 2 **pursue or an activity you are planning to undertake?**
 3 A. No.
 4 **Q. Do federal officeholders or candidates --**
 5 **actually, do federal candidates ever provide you with**
 6 **strategic information in advance about their plans?**
 7 A. No.
 8 **Q. Do federal officeholders or candidates ever**
 9 **provide you with information about their donors?**
 10 A. No.
 11 **Q. What's the relationship between the CRP and the**
 12 **RPSD?**
 13 A. They are the state party. We are the county
 14 party. The relationship is separate.
 15 **Q. The chairman of the county party sits on the**
 16 **State Central Committee, Correct?**
 17 A. Yes.
 18 **Q. Is there any other formal cross-membership**
 19 **along those lines?**
 20 A. Other than some members of the County Committee
 21 sitting on the State Central Committee, no.
 22 **Q. The current chair of the CRP is the former head**
 23 **of the RPSD, right?**
 24 A. Yes.
 25 **Q. How frequently does the CRP contact the RPSD?**

100

FEC Exhibit 4

**United States District Court
District of Columbia**

Republican National Committee et al., <i>Plaintiffs,</i> v. Federal Election Commission, <i>Defendant.</i>	Case No. 08-1953 (BMK, RJL, RMC) THREE-JUDGE COURT
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Plaintiff Republican National Committee's Discovery Responses

Pursuant to Federal Rules of Civil Procedure 33, 34, and 36 the Republican National Committee ("RNC") makes the following discovery responses.

General Objections

1. The RNC objects to the requests to the extent that they purport to call for the production of documents\information that: (a) contain privileged attorney-client communications; (b) constitute attorney work product; (c) disclose the mental impressions, conclusions, opinions, or legal theories of any attorneys or other representatives of the RNC; (d) were prepared in anticipation of litigation; or (e) are otherwise protected from disclosure under applicable privileges, immunities, laws, or rules.

2. The RNC objects to the requests to the extent that they are vague, not limited in scope, unreasonably broad and burdensome, or beyond the scope of either category of permissible discovery under Fed. R. Civ. P. 26(b)(1). *See* Fed. R. Civ. P. 26(b)(1) advisory committee's note (2000).

3. The RNC objects to the instructions accompanying the requests to the extent that they

purport to impose obligations beyond those imposed by the Federal Rules of Civil Procedure or local rules.

4. The RNC objects to requests for information the benefit of which is outweighed by its lack of importance in resolving the issues at stake in this case. *See* Fed. R. Civ. P. 26(b)(2)(i) (discovery cannot be “unreasonably cumulative or duplicative, or . . . obtainable from some other source” and is limited if the burden or expense of the proposed discovery outweighs its likely benefit, taking into account . . . [inter alia] the importance of the proposed discovery in resolving the issues.” *Id.* at (iii).

5. By responding to these requests, the RNC does not concede that any of the documents\information requested are relevant to a claim or defense or the subject matter of this action or are admissible at the trial thereof or that any person identified in the responses has documents relevant to this action. The RNC reserves any and all objections as to competency, relevance, materiality, privilege, admissibility, or any other grounds on which an objection may be made. The RNC expressly reserves the right to object to further discovery into the subject matter of these requests. Any response to a request that inadvertently discloses privileged documents\information is not intended to and shall not be deemed or construed to constitute a waiver of any privilege or right of Plaintiff. Insofar as a response to a request may be deemed to be a waiver of any privilege or right, such waiver shall be deemed to be a waiver limited to that particular response only.

6. The RNC objects to the extremely vague, overbroad and ambiguous definition of “donor,” “grassroots lobbying,” “officeholder,” “redistricting activities,” “donation,” and “support state candidates.” The RNC also objects to the extremely vague, overbroad and

ambiguous definition of "solicitation," which encompasses "indirect" requests or suggestions that a person make a donation.

7. Subject to and without waiving any of the foregoing General Objections, which are hereby incorporated into each response given below, the RNC (a) objects to the individual requests and (b) makes the required good faith attempt to fulfill its duty to provide all responsive information readily available to it without undue labor and expense as follows:

Interrogatories

1. For the period from January 1, 2003, through December 31, 2008, identify each solicitation you made that indicated that some or all of the donations received in response to the solicitation would be used to (a) support state candidates; (b) fund redistricting activities; (c) fund grassroots lobbying; or (d) fund litigation activity. For each response solicitation, indicate:

- (i) the date of the solicitation;
- (ii) the method (e.g., mail, email, in person, etc.) of the solicitation
- (iii) which of the above uses was mentioned in the solicitation;
- (iv) a general description of the person to whom the solicitation was made (e.g. "registered Republicans in Maryland," "donors for McCain precedential campaign," etc.); and
- (v) whether Duncan made or was named in the solicitation.

Response: Based on a review of the documents in the RNC's possession, custody, and control, the RNC can find no evidence that it has made any solicitations described in subpart (a), (b), (c), or (d). However, the RNC reserves the right to amend and supplement its response.

2. For each solicitation response to Interrogatory 1, provide the date and amount of each

contribution that you received in response to that solicitation. Contributions of less than \$200 may be aggregated for each solicitation.

Response: As stated in its response to Interrogatory No. 1, the RNC can find no evidence that it has made any such solicitations. Accordingly, the RNC can find no evidence that it has received such contributions. However, the RNC reserves the right to amend and supplement its response.

3. For each year from 2003 through 2008, inclusive, indicate the aggregate dollar amount of disbursements that you made for each of the following purposes: (a) to support state candidates; (b) to support redistricting activities; (c) to engage in grassroots lobbying; or (d) to fund litigation activity. For any year in which you made disbursements responsive to subpart (a) of this Interrogatory, also indicate: (i) the states to which the disbursements were directed; and (ii) for any disbursement you made directly to an individual seeking state office or his campaign committee, the name of the individual, the office sought, and the amount of the disbursement. For any year in which you made disbursements responsive to subpart (c) of this Interrogatory, also indicate the amount that you disbursed during that year for each district grassroots lobbying advertisements. For any year in which you made disbursements responsive to subpart (d) of this interrogatory, also indicate the court actions to which the disbursements were directed.

Response:

a. Support State Candidates

The RNC provides the following responsive information regarding support of state candidates.

Year	Disbursements to States	Disbursements to State Candidates
2003		
2004		Name: Peter Cianchette Office: Governor Amount: \$ 500.00
2005	New Jersey (county parties) \$ 292,000.00	Name: Jerry Kilgore Office: Governor Amount: \$ 886,316.00
2006		
2007	Louisiana \$ 539,589.83 Kentucky \$ 448,197.33	
2008		

In addition to these disbursements, the RNC routinely transfers funds to state parties. These transfers are reported to the FEC as part of the RNC's regular filings to the FEC and this information is therefore publicly available.

b. Redistricting Activities

The RNC provides the following responsive information regarding support of redistricting activities.

Year	Amount of Disbursement
2003	\$ 495.00
2004	
2005	
2006	
2007	\$ 5,000.00
2008	\$ 8,625.05
TOTAL	\$ 14,120.05

c. Grassroots Lobbying

Based on a review of the documents in the RNC's possession, custody, and control, the RNC cannot document the amount of resources expended for Grassroots Lobbying activities. However, the RNC reserves the right to amend and supplement its response.

d. Litigation Activity

The RNC objects to this request as it seeks information protected by attorney-client privilege and attorney work product doctrine. Subject to and without waiving this objection or the General Objections above, information concerning disbursements made by the RNC to various law firms is reported by the RNC in its regular filings to the FEC on Schedule B at Line 21B.

4. Describe any measures you intend to take to prevent donors of nonfederal funds from gaining influence over or "obtaining preferential access" to officeholders or candidates," should you be granted the relief you seek in this case. Describe in particular any measures you intend to take to ensure that you will not "(1) encourage officeholders or candidates to meet with or have other contact with contributors to [nonfederal] accounts, (2) arrange for [nonfederal] contributors to participate in conference calls with federal candidates or officeholders, or (3) offer access to federal officeholders or candidates in exchange for [nonfederal] contributions."

Response: If it is granted the relief it seeks, the RNC will not grant contributors of non-federal funds with preferential access to any federal candidate or officeholder above and beyond what they would be otherwise afforded, based on the contributions of federal funds to the RNC. Furthermore, in regard to both federal and potential non-federal contributions, the RNC

would instruct its staff not to facilitate any one-on-one meetings or other individualized contact between contributors and federal candidates and officeholders. But irrespective of the amount of non-federal funds contributors may give, they will not be afforded any special opportunities for access to federal candidates or officeholders.

5. Describe how you “currently afford[]” “preferential access to federal candidates or officeholders” or other benefits to contributors of federal funds, including how you “(1) encourage officeholders or candidates to meet with or have other contact with contributors to [federal] accounts, (2) arrange for [federal] contributors to participate in conference calls with federal candidates or officeholders, or (3) offer access to federal officeholders or candidates in exchange for [federal] contributions.” (Pls.’ Statement of Undisputed Material Facts ¶ 24.).

Response: The RNC does not currently grant “preferential access to federal candidates or officeholders” to contributors of non-federal funds, since they cannot receive these funds. The RNC does provide contributors of federal funds with certain opportunities and invitations to certain events not offered to the public at large. Documents describing the RNC’s various donor programs have been produced contemporaneously in response to Request for Production No. 5. The RNC does not facilitate one-on-one meetings between federal candidates and officeholders and any contributor of federal funds. Nor does the RNC encourage federal candidates or officeholders to meet one-on-one with or have other individualized contact with any RNC contributor.

Requests for Admission

1. Admit that your proposed redistricting activity would influence elections for the United States House of Representatives.

Objection: The RNC objects to Request No. 1 on the grounds that the term “influence” is vague and ambiguous.

Response: Subject to and without waiving its objection, the RNC denies Request No. 1.

2. Admit that your proposed redistricting activity is intended, at least in part, to influence elections for the United States House of Representatives.

Objection: The RNC objects to Request No. 2 on the grounds that the term “influence” is vague and ambiguous.

Response: Subject to and without waiving its objection, the RNC denies Request No. 2.

Requests for Production

Objection: The RNC objects to the FEC’s Requests for Production to the extent that they are overly burdensome and exceed the guidelines set forth in *FEC v. Wisconsin Right to Life*, 127 S. Ct. 2652, 2666 (2007). Burdensome discovery in the context of an as-applied First Amendment challenge constitutes a “severe burden on political speech.” *Id.* at 2666 n. 5. The RNC stores its archived files, which includes hundreds of thousands of documents, in an offsite warehouse. To review all such documents in response to the FEC’s Requests for Production, particularly in an expedited manner as requested by the FEC, would impose an undue burden on the RNC.

1. All solicitations identified in response to Interrogatory 1.

Response: The RNC objects to Request No. 1 on the grounds that it is vague and overbroad. Subject to and without waiving these objections or the General Objections above, the RNC responds as follows. Based on a review of the documents in the RNC’s possession,

custody, and control, the RNC can find no evidence of solicitations in response to Interrogatory No. 1. However, the RNC reserves the right to amend and supplement its response.

2. All documents containing the script or text, or their audio/visual equivalent, of any grassroots lobbying funded by a disbursement responsive to Interrogatory 3(c).

Response: The RNC objects to Request No. 2 on the grounds that it is vague and overbroad. Subject to and without waiving these objections or the General Objections above, the RNC responds as follows. Based on a review of the documents in the RNC's possession, custody, and control, the RNC can find no evidence of documents containing the script or text, or their audio/visual equivalent, of any grassroots lobbying funded by a disbursement responsive to Interrogatory 3(c). However, the RNC reserves the right to amend and supplement its response.

3. Documents sufficient to identify the goods or services you received in exchange for each disbursement of more than \$1,000 responsive to Interrogatory 3(a) or Interrogatory 3(b).

Response: RNC objects to Request No. 3 on the grounds that it is vague and overbroad. Subject to and without waiving these objections or the General Objections above, the RNC produces non-privileged documents in its possession, custody and control responsive to this request. *See* RNC 000001-000046.

4. All documents created after January 1, 2003, relating to any measure responsive to Interrogatory 4, regardless of whether such measure has been or will be put into effect.

Response: Subject to and without waiving the objections above, the RNC produces non-privileged documents in its possession, custody and control responsive to this request. *See* RNC000047-000057. The RNC has withheld two responsive documents because they are

protected under the attorney-client privilege. These documents are internal memoranda from the RNC legal department.

5. All documents created after January 1, 2003, relating to any “preferential access to federal candidates or officeholders” or other benefits you “currently afford to contributors of federal funds.”

Response: Subject to and without waiving the objections above, the RNC produces non-privileged documents in its possession, custody and control responsive to this request. *See* RNC000058-000371.

6. All documents created after January 1, 2003, relating to the “rise of 527s” and any “fundraising disadvantage” of the RNC relative to “527s” (Pls.’ Statement of Undisputed Material Facts ¶ 26), as well as any comparison or analysis between your fundraising or spending and that of organizations — other than entities registered with the Commission as political committees — organized under 26 U.S.C. § 501(c) or 26 U.S.C. § 527.

Response: Subject to and without waiving the objections above, the RNC produces non-privileged documents in its possession, custody and control responsive to this request. *See* RNC000372-000596.

7. All documents relating to whether and how you have “been negatively affected by the explosion of internet fundraising” (Pls.’ Statement of Undisputed Material Facts ¶ 26).

Response: The RNC objects to Request No. 7 on the grounds that it is vague and overbroad. Subject to and without waiving these objections or the General Objections above, the RNC responds as follows. Based on a review of the documents in the RNC’s possession, custody, and control, the RNC can find no documents evidencing the negative effect of the

explosion of internet fundraising. However, the RNC reserves the right to amend and supplement its response.

8. All documents you produced to the Commission pursuant to any discovery request in the *McConnell v. FEC* action, as well as all of your responses to the Commission's interrogatories and requests for admission in that case.

Response: Pursuant to the stipulation and protective order agreed to by the parties on February 20, 2009, these documents have been made available to the FEC.

9. All documents (other than privileged communications) consulted or used in the preparation of your responses to the foregoing interrogatories, requests for admission, or document requests. Documents produced in response to other document requests are excluded from this request.

Response: Subject to and without waiving the objections above, the RNC produces non-privileged documents in its possession, custody and control responsive to this request. *See* RNC000001-000046.

Verification

I declare under penalty of perjury that the foregoing answers to the FEC's interrogatories are true and correct. Executed on February 25, 2009.

/s/ Heather Sidwell
Heather Sidwell,
Republican National Committee

Charles H. Bell, Jr.*
Bell, McAndrews & Hiltachk, LLP
455 Capitol Mall, Suite 801
Sacramento, CA 95814
Tel: (916) 442-7757
Fax: (916) 442-7759
cbell@bmhlaw.com
*Counsel for California Republican Party
and Republican Party of San Diego County*

Respectfully submitted,

/s/ James Bopp, Jr.
James Bopp, Jr., Bar #CO0041
Richard E. Coleson*
Clayton J. Callen*
Kaylan L. Phillips*
BOPP, COLESON & BOSTROM
1 South Sixth Street
Terre Haute, IN 47807-3510
812/232-2434 telephone
812/234-3685 facsimile
Lead Counsel for all Plaintiffs
*Pro Hac Vice

FEC Exhibit 5

National Republican
Congressional Committee

Russo Marsh + Raper, Inc.
TV TRT :30 seconds

"Taxed too much"

AUDIO	VIDEO
<p>Working men and women are taxed too much. It means longer working hours and less time for the things that really matter.</p>	<p>Photos of working people. CG - Taxed too much. Photos of families.</p>
<p>In the State Senate, Gex Williams voted to reduce the tax we pay on our cars.</p>	<p>Collage of Photo's - guy washing his car, family in station wagon, woman buying car. CG - Reduce the personal property tax. SB 275 (1997-98)</p>
<p>He worked to repeal the tax on prescription medicine.</p>	<p>Photos of doctors and medicine stuff. Photos of older people. SB 56 (1997-98)</p>
<p>He voted to phase-out the unfair inheritance tax.</p>	<p>Photo's of family with farm. HB 2 (1995-96)</p>
<p>It's simple. Gex Williams knows you have better things to do with your money than pay higher taxes.</p>	<p>Shots of taxpayers with their families.</p>
<p>Call Gex Williams. Tell him to keep working for lower taxes.</p>	<p>Photo of Gex fades up over faded flag. Phone number comes up. CG - Keep working for lower taxes.</p>

10/1/98 12:01 PM

502-5648
[Handwritten signatures and notes]

**DEPOSITION
EXHIBIT**
H
3/3/09 KV

RNC 98-CV-1207 15932

FEC Exhibit 6

RNC AD
"MORE"
TV: :30

VIDEO

Graphic: "5 million illegal immigrants in the U.S."
B&W Footage, illegals crossing border.

Graphic: "You spend \$5.5 billion to support illegals."
B&W Footage of illegals on boats, rafts.

Graphic: "Under Clinton...spending for illegals. ↑12.7%."
B&W footage of illegals crossing borders.

Graphic: "Under Clinton...wages for typical worker. ↓2.5%."
Video of American workers.

B&W footage of illegals crossing borders.
Graphic: "Clinton was opposed."

Graphic: "Tell President Clinton ... Stop giving benefits to illegals. End wasteful Washington spending."

AUDIO

Did you know there are over 5 million illegal immigrants in the U.S.?

And that you spend 5 1/2 billion dollars a year to support them with welfare, food stamps, and other services.

Under President Clinton, spending on illegals has gone up.

While wages for the typical worker have gone down.

And when efforts were made to stop giving benefits to illegal immigrants, Bill Clinton opposed them.

Tell President Clinton to stop giving benefits to illegals, and end wasteful Washington spending.

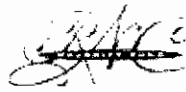
Under President Clinton
spending on illegals has gone up

RNC 98-CV-1207 10126

ODP0023-02326



FEC Exhibit 7



REPUBLICAN NATIONAL COMMITTEE MAJOR DONOR GROUPS

2009

The Finance Department in the Republican National Committee delivers our major donors a level of service and commitment found in no other political organization in the country. Beginning in 2009, we look to refine and hone our major donor clubs all the while bringing the GOP directly to your doorstep. Several initiatives and benefits shared by all clubs include:

- **National Meetings:** Typically held in Washington, DC, national meetings allow our members to interact with key policymakers in our nation's capital. Members enjoy club specific events throughout national meetings.
- **Regional Meetings:** Held throughout the country, regional meetings range in size from intimate dinners to small gatherings with RNC officials and leading GOP politicians. Members are encouraged to take the initiative and host their own events.
- **Website:** Each Major Donor Club has access to a club specific website where members can interact with one another, retrieve updated event information, etc.
- **RNC Finance Staff:** Here to make your RNC experience as smooth as possible.

REPUBLICAN REGENTS

- As the GOP's most exclusive donor group, *Regents* members enjoy intimate events with key GOP policymakers and strategists all in select locations nationwide.
- At least one *Regents* exclusive event during the year.
- **Membership:** Annual commitment of \$30,400 for member and another \$30,400 contribution by the member's spouse or colleague, totaling \$60,800 in 2009 (\$200,000 raising).

TEAM 100

- Designed for leading businessmen and individuals from around the country, *Team 100* provides members with a forum to communicate with RNC officials, politicians, and political pundits.
- *TEAM 100* members enjoy exclusive private functions with elected Republican leaders. These events range from luncheons and dinners to regional and national meetings.
- **Membership:** Annual contribution of \$30,400 (\$100,000 raising).

REPUBLICAN EAGLES

- The RNC's oldest major donor club, the *Eagles* donor group is considered the bulwark of the Republican Party. Members enjoy informative events and gatherings in a relaxed atmosphere with friends and fellow members.
- Preferential treatment at national and regional meetings.
- **Individual Membership:** Annual contribution of \$15,000 (\$50,000 raising).

YOUNG EAGLES

- Tailored exclusively to appeal to young professionals interested in business and policy, the *Young Eagles* is open to anyone under the age of 45.
- *Young Eagles* exclusive events in destinations such as New York, Miami, Los Angeles, and Dallas.
- Opportunity to engage and network with leading politicians, policymakers, and pundits.
- **Membership:** Requires an annual contribution of \$7,500 (\$30,000 raising).

MAJORITY FUND

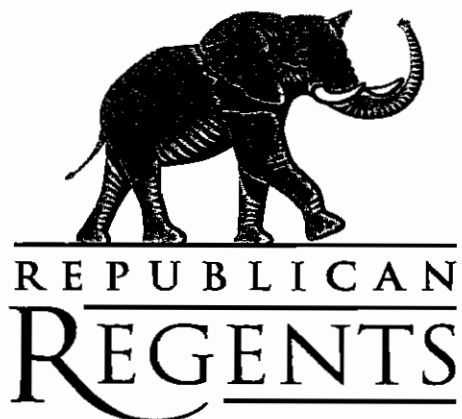
- *Majority Fund* offers events adapted to a Washington D.C. executive's busy schedule including intimate luncheons, dinners, and meetings with key policymakers and pundits.
- *Majority Fund* members also enjoy benefits shared by members of the Eagles donor club.
- **Membership:** Annual contribution of \$15,000.

Paid for by the Republican National Committee.
310 First Street SE, Washington, D.C. 20003 - (202) 863-8500 - www.gop.com
Not authorized by any candidate or candidate's committee.

DEPOSITION
EXHIBIT
C
3/3/09 KV

RNC000130

FEC Exhibit 8



2006-2007 Upcoming Calendar of Events

2006

- October 18th** **Reception with President Bush**
Greensboro, NC
- October 24th** **Reception with President Bush**
Boca Grand, FL
- October 27th and 28th** **Raisers' weekend in Kiawah, SC**
Speakers: President Bush and Vice President Cheney
You must raise \$50,000 in new money to attend this event

2007

- Feb. 22-24, 2007** **Major Donor Winter Retreat**
The Breakers Hotel
Palm Beach, FL

Additional dates to follow.

*For more information, please contact Heather Patterson,
Regents Director, at [REDACTED] or via e-mail at [REDACTED].*

2006 REPUBLICAN REGENTS MEMBERSHIP BENEFITS

NATIONAL MEETINGS

The Regents host a minimum of two national meetings throughout the U.S. each year. At these events, members meet with national political figures to discuss the policies and future of the Republican Party. Members participate in Issue Forums with these leaders and receive briefing material on current issues, polling and public surveys. In addition, social activities such as golf tournaments, boating excursions and private dinners are also planned.

2006 RNC ANNUAL GALA

Each year the RNC hosts its largest gala fundraising event in Washington, D.C. Regents' members enjoy participating in small policy and social events with Republican experts, leaders and celebrities, as well as a minimum of two complimentary tickets to the gala.

REGIONAL EVENTS

Regional Events provide the opportunity to meet with RNC leadership and elected Republican leaders in a more relaxed and intimate social setting in your own region.

2006 NATIONAL FINANCE COMMITTEE

As a Regent member you are also a member of our National Finance Committee. The National Finance Committee includes those that donate significantly to the RNC as well as those that raise money for our national Party. Conference calls are arranged on a regular basis for NFC members to interact with Republican leaders. These calls serve as a vehicle for members to discuss with the policy makers of our party those political issues that concern them the most.

Page 2
2006 Regents Benefits

RNC COMMUNICATIONS

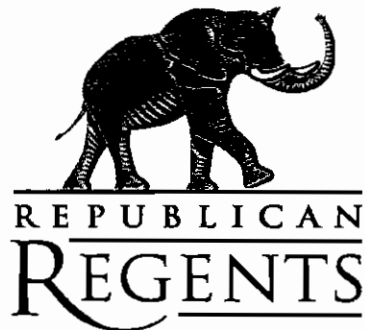
Members regularly receive RNC communications on current legislative topics, Chairman's Updates, and the RNC's magazine.

RNC STAFF

The REGENTS staff in Washington, D.C. is available to answer questions regarding membership, upcoming activities or for any assistance with appointments. Our staff provides any needed political or legislative information as well as information on federal contribution guidelines and assuring compliance with those guidelines. REGENTS Director Heather Patterson and Regents Staff Assistant Lizzie Cullen are available at [REDACTED].

2006 Regents Membership Guidelines & Benefits

- An election cycle commitment of \$25,000 per year for the member and another \$25,000 per year contribution by the member's spouse or colleague, totaling \$50,000 in 2006. If a member is getting another colleague to join with him/ her, the colleague **must be a new member not a member of another club.**
- Premier seating and two complimentary tickets to the 2006 RNC Presidential Gala
- Two National Meetings throughout the U.S. where Members participate in Issues Forums with these leaders and receive informative briefing material on current issues, polling and public surveys
- There will be specific amenities for Regents members throughout the year and we will update members as the opportunities arise.



2007 REPUBLICAN REGENTS MEMBERSHIP BENEFITS

NATIONAL MEETINGS

The Regents host a minimum of two national meetings throughout the U.S. each year. At these events, members meet with national political figures to discuss the policies and future of the Republican Party. Members participate in Issue Forums with these leaders and receive briefing material on current issues, polling and public surveys. In addition, social activities such as golf tournaments, boating excursions and private dinners are also planned.

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Page 2
2007 Regents Benefits

RNC COMMUNICATIONS

Members regularly receive RNC communications on current legislative topics, Chairman's Updates, and the RNC's magazine.

RNC STAFF

The REGENTS staff in Washington, D.C. is available to answer questions regarding membership, upcoming activities or for any assistance with appointments. Our staff provides any needed political or legislative information as well as information on federal contribution guidelines and assuring compliance with those guidelines. REGENTS staff is available at [REDACTED].



The New Chairman's Dinner

*Featuring Mike Duncan, RNC Chairman, introduced by Jo Anne Davidson,
RNC Co-Chairman*

The Capitol Hill Club
300 First Street, SE
Washington, DC 20003

March 8, 2007

6:00 pm – Reception and Photo Opportunity

7:00 pm – Dinner

Open to all active members of the Majority Fund, Chairman's Advisory Board and The President's Club.

Please call [REDACTED] to RSVP with Liz Kelly or call [REDACTED] to
RSVP with Debbie LeHardy.

Paid for by the Republican National Committee. Not authorized by any candidate or
candidate's committee.

Republican National Committee • 310 First St. SE • Washington, DC 20003



You are cordially invited to a

Luncheon

hosted by the

Republican National Committee

with

President George W. Bush

Friday, March 23, 2007

11:00 a.m.

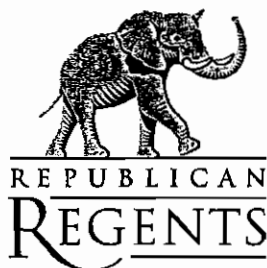
Evermay

1623 28th Street, Northwest
Washington, D.C.

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE.
310 FIRST STREET, S.E. • WASHINGTON, D.C. 20003 • 202-863-8720
NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.



EVERMAY LUNCHEON



*For questions on your membership, the
Regents staff can be reached at [REDACTED].
Space is limited, please respond at your earliest convenience.*

- Yes*, I would like to attend the photo-op and luncheon and I will renew my Regents membership for 2007 (\$25,000 from the member and \$25,000 from his/her spouse or colleague).

- No*, I am unable to attend the photo-op and luncheon, but I will renew my Regents membership for 2007 (\$25,000 from the member and \$25,000 from his/her spouse or colleague).

Please mail your contribution to the following address:
Republican National Committee
ATTN: Evermay Event
310 First Street, S.E.
Washington, D.C. 20003

(over, please)



ELLIOTT B. BROIDY

REPUBLICAN NATIONAL COMMITTEE FINANCE CHAIRMAN

GORDON D. SONDLAND

AMBASSADOR CHARLES J. SWINDELLS

CORDIALLY INVITE YOU

TO

A Private Luncheon

WITH SPECIAL GUEST

KARL ROVE

ON

FRIDAY, APRIL 13, 2007

AT THE

PORTLAND ART MUSEUM

SONDLAND DURANT TRUSTEE ROOM

1219 SW PARK AVENUE

PORTLAND, OREGON

BUSINESS CASUAL

LUNCH 12:00—1:30 PM

FOR MORE INFORMATION PLEASE CALL NICOLE ZAMORA AT

TO RSVP PLEASE FAX THIS FORM TO

YES, I/WE WILL ATTEND

NO, I/WE CAN NOT ATTEND BUT WOULD LIKE MORE INFORMATION ABOUT THE REPUBLICAN NATIONAL COMMITTEE

NAME

GUEST NAME

OCCUPATION

EMPLOYER

ADDRESS

CITY

STATE

ZIP

PHONE

FAX

EMAIL ADDRESS

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE.

310 FIRST ST., SE, WASHINGTON, DC 20003

NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.

RNC000070



You are cordially invited to a

Luncheon

hosted by the

Republican National Committee

with

President George W. Bush

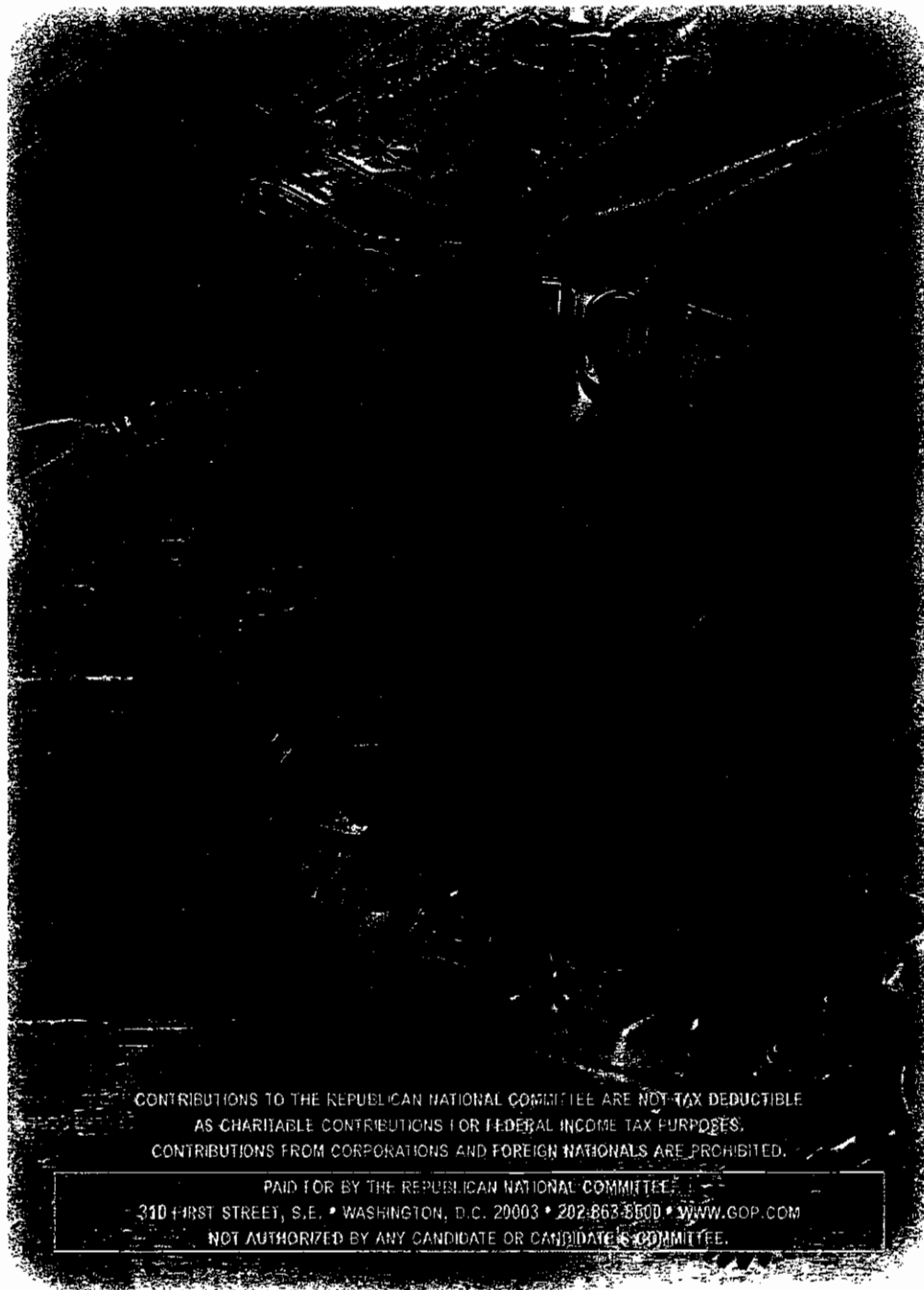
Monday, June 18, 2007

11:00 a.m.

Evermay
1623 28th Street, Northwest
Washington, D.C.

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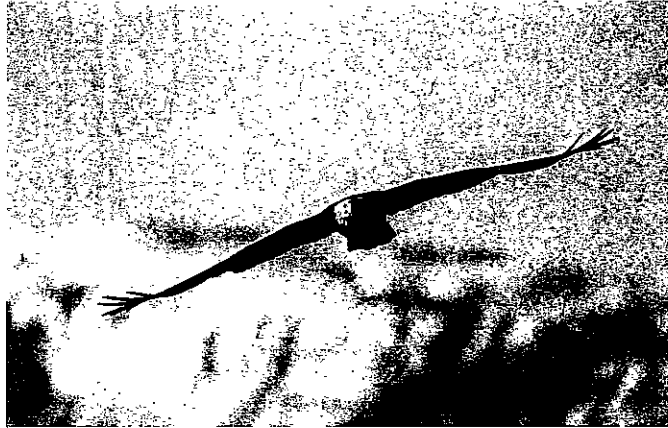
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SAVE THE DATE
GRAVENEAD
WITH
PRESIDENT
GEORGE W. BUSH
THURSDAY, AUGUST 18
AND
FRIDAY, AUGUST 17, 2007

For hotel reservations in Dallas contact: _____
The Four Seasons Resort and Club at 972-717-2499.
Please reference the RNC when making reservations.
For more information, please call Dee Dee Lancaster
at _____ . Details to follow.

REPUBLICAN NATIONAL COMMITTEE • 310 FIRST STREET, S.E. • WASHINGTON, DC 20003



Save the Date!

Summer Meeting

August 19-22, 2007

Dinner featuring Vice President Dick Cheney

on

August 21, 2007

Jackson Hole, Wyoming

The Four Seasons Hotel

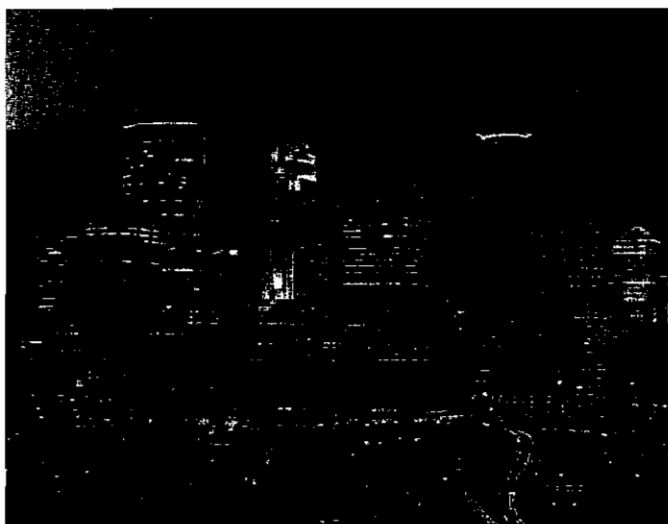
Please call 800.295.5281 for reservations. Ask for the
Republican National Committee room block.

Preliminary agenda attached...you don't want to miss this!

aid for by the Republican National Committee.
310 First Street, SE – Washington, DC – (202) 863-8500 – www.gop.com
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"Cheeseburgers in Paradise" Featuring Maria Cino

**President & CEO, Committee on Arrangements
2008 Republican National Convention**



Paradise: (PEAR' uh dice)--synonym: The Twin Cities. The spectacular locale where the GOP will celebrate opportunities in September 2008.

Please join us for "Cheeseburgers in Paradise" with featured guest Maria Cino, who will share all the inside scoop on the 2008 Republican Convention in the Twin Cities! *We will be serving Charlie Palmer's FAMOUS Cheeseburgers. Should you have any dietary requests, PLEASE let us know. We will be happy to accommodate! Spaces are limited!*

When: Thursday, September 20, 2007

Where: Charlie Palmer's Steakhouse, 101 Constitution Ave, NW

Time: 11:30 AM – 1:00 PM

Please RSVP to Ann McEniry, Majority Fund by COB Monday, September 17 at [REDACTED] or via email at [REDACTED]

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RNC000075



You are cordially invited to a

Luncheon

hosted by the

Republican National Committee

with

President George W. Bush

Friday, September 21, 2007

10:30 a.m.

Evermay

1623 28th Street, Northwest

Washington, D.C.

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TO

A Luncheon

WITH SPECIAL GUEST

VICE PRESIDENT DICK CHENEY

ON

WEDNESDAY, SEPTEMBER 26, 2007

AT THE HOME OF

BRAD FREEMAN



PLEASE ARRIVE NO LATER THAN
 11:15 AM FOR SECURITY
 LATE ARRIVALS WILL NOT BE
 GUARANTEED ENTRANCE
 BUSINESS ATTIRE
 INVITATION IS NOT TRANSFERABLE

CONTRIBUTIONS OR GIFTS TO THE REPUBLICAN NATIONAL
 COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS
 FOR FEDERAL TAX PURPOSES.

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RSVP TO CAPITAL CAMPAIGNS
 AT [REDACTED] OR EMAIL
 [REDACTED]

RESPONSE FORM FREEMAN VP LUNCH

I will contribute \$25,000 and my spouse or colleague will contribute \$25,000 to the RNC (*individuals are limited to \$28,500 per person to the RNC in each calendar year*) and attend the Lunch.

As a Regent's member I/we will receive:

- Tickets for 2 to attend the Lunch at the home of Brad Freeman on Wednesday, September 26th.
- Tickets for 2 to attend the Reception preceding the Lunch at the home of Brad Freeman.
- Republican Regents Membership Benefits.

I / we will contribute \$25,000 to the RNC (*individuals are limited to \$28,500 per person to the RNC in each calendar year*) and attend the Lunch.

As a Team 100 member I/we will receive:

- Tickets for 2 to attend the Lunch at the home of Brad Freeman on Wednesday, September 26th.
- Tickets for 2 to attend the Reception preceding the Lunch at the home of Brad Freeman.
- Republican Team 100 Membership Benefits.

I / we will contribute \$15,000 to the RNC (*individuals are limited to \$28,500 per person to the RNC in each calendar year*) and attend the Lunch.

As a Republican Eagles member I/we will receive:

- Tickets for 2 to attend the Lunch at the home of Brad Freeman on Wednesday, September 26th.
- Tickets for 2 to attend the Reception preceding the Lunch at the home of Brad Freeman.
- Republican Eagles Membership Benefits.

I / we will contribute \$5,000 to the RNC (*individuals are limited to \$28,500 per person to the RNC in each calendar year*) and attend the Lunch with a guest.

_____	_____
Name	Guest Name
_____	_____
Social Security Number	Social Security Number
_____	_____
Date of Birth	Date of Birth

I / we cannot attend the reception but would like to contribute \$ _____ to the RNC.

PLEASE MAKE CHECK(S) PAYABLE TO THE REPUBLICAN NATIONAL COMMITTEE

Contributions or gifts to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes. You may only contribute with personal funds. All contributions received are subject to federal contribution limits and are used to fund all RNC programs including direct candidate support. Contributions to the RNC apply toward an individual's bi-annual aggregate federal contribution limit of \$65,500 applicable to federal PAC's and party committees, including all national party committees. Contributions from corporations and foreign nationals are prohibited.

If you prefer to pay by credit card, please see below (each individual must list separate cards):
Credit card contributions may be transmitted by fax to _____

<input type="checkbox"/> This contribution to the Republican National Committee represents my personal funds and is not drawn on an account maintained by an incorporated entity.		
Credit Card Payment Option: [] VISA [] Master Card [] American Express		
Amount: \$ _____ Name (as on card): _____		
Card #: _____	Exp. Date: _____	
Signature: _____		

E-Mail Address: _____ Daytime Phone: _____ Fax: _____

Federal law requires that we report the following information:

Occupation: _____ Employer: _____ [] Please check if self-employed

Spouse Occupation: _____ Employer: _____ [] Please check if self-employed

Mailing Address : _____ [] Home [] Office

City, State, Zip: _____

For more information and to RSVP please call _____

<p>PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE. 310 FIRST ST., SE, WASHINGTON, D.C. 20003 NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.</p>



Please join

Elliott Broidy David Burke The Honorable Ken Mehlman
Jack L. Oliver The Honorable Bill Paxon

for a luncheon

hosted by

The Republican National Committee
with
President George W. Bush

Wednesday, September 26, 2007
12 noon

At the home of
Jennifer Saul Yaffa and Robert Yaffa

Please RSVP to Olivia Dorieux at [REDACTED]
or by email to: [REDACTED]

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New York City Luncheon

*For questions on your membership, the
RNC staff can be reached at [REDACTED]
Space is limited, please respond at your earliest convenience.*

- Yes, I would like to attend the photo-op and luncheon and I will join/renew my Regents membership for 2007 (\$25,000 from the member and \$25,000 from a spouse or colleague).
- No, I am unable to attend the photo-op and luncheon, but I will join/renew my Regents membership for 2007 (\$25,000 from the member and \$25,000 from a spouse or colleague).
- Yes, I would like to attend the photo-op and luncheon and I will join/renew my TEAM 100 membership for 2007 (\$25,000 per couple).
- No, I am unable to attend the photo-op and luncheon, but I will join/renew my TEAM 100 membership for 2007 (\$25,000 per couple).
- Yes, I would like to attend the photo-op and luncheon and I will join/renew my Eagles membership for 2007 (\$15,000 per couple).
- No, I am unable to attend the photo-op and luncheon, but I will join/renew my Eagles membership for 2007 (\$15,000 per couple).

(over, please)





TO
A Reception and Dinner

WITH SPECIAL GUEST

KARL ROVE

ON

FRIDAY, OCTOBER 5, 2007

AT THE HOME OF

DR. AND MRS. ROBERT SHILLMAN



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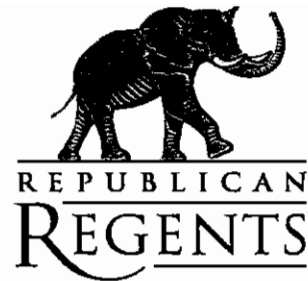
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RSVP TO CAPITAL CAMPAIGNS
AT [REDACTED] OR EMAIL [REDACTED]

RECEPTION 6:00 PM
DINNER 7:00 PM
BUSINESS ATTIRE



TEAM



The Republican National Committee

Along with

Ambassador and Mrs. Mel Sembler

Cordially invite you

TO

A Private Reception and Luncheon

With Special Guest

President George W. Bush

On

Friday, October 12, 2007

Bayou Club Estates

At the home of Brent & Debbie Sembler



9:30 A.M.

Casual Business Attire

RSVP to Ann Herberger

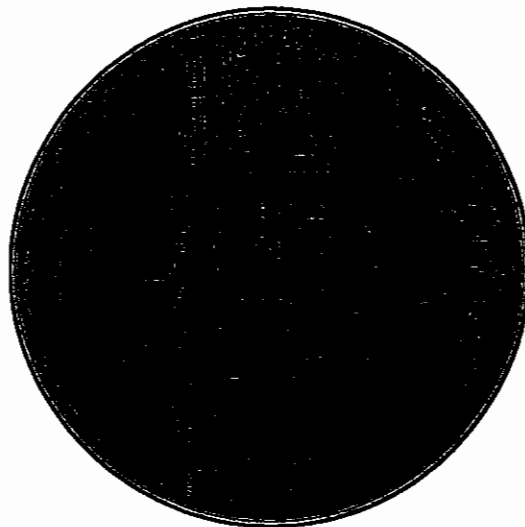
At [redacted] (phone) or [redacted] (fax)

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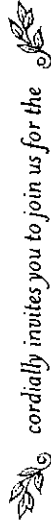
OUR
BUILDING
FUTURE

[THE REPUBLICAN NATIONAL COMMITTEE]



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THE LEADERSHIP OF THE REPUBLICAN NATIONAL COMMITTEE



cordially invites you to join us for the

GOP PRESIDENTIAL TRUST DINNER



Featuring

2008 PRESIDENTIAL CANDIDATES

- THE HONORABLE RUDY GIULIANI
- THE HONORABLE JOHN MCCAIN
- THE HONORABLE RON PAUL
- THE HONORABLE MITT ROMNEY
- THE HONORABLE FRED THOMPSON

TUESDAY, OCTOBER 16, 2007
 6:00 PM - Leadership Reception
 7:00 PM - Dinner

NATIONAL BUILDING MUSEUM
 401 F STREET, NW
 WASHINGTON, D.C.

 KINDLY RSVP BY OCTOBER 9, 2007
 BY CALLING KATHLEEN WILBER AT 

A BLOCK OF ROOMS HAS BEEN RESERVED AT THE
 FOUR SEASON HOTEL, IN WASHINGTON DC
 PLEASE CALL 202 944 9157 AND ASK FOR THE RNC ROOM BLOCK

—•••••
PRESIDENTIAL TRUST DINNER
•••••—

Please note that you must be a current and active member of one of the clubs listed below to attend the Presidential Trust Dinner. Ticket allotments are noted. For information on joining one of the clubs listed below please contact Kathleen Wilber at [REDACTED].

As a current and active **Regents Member (\$50,000)*** you are entitled to:

- 4 Premier Seating Tickets to the Presidential Trust Dinner
- 4 Tickets to the Leadership Reception with the Candidates

As a current and active **Team 100 Member (\$25,000)** you are entitled to:

- 4 Tickets to the Presidential Trust Dinner
- 2 Tickets to the Leadership Reception with the Candidates

As a current and active **Eagles or Majority Fund Member (\$15,000)** you are entitled to:

- 4 Tickets to the Presidential Trust Dinner

As a current and active **Chairman's Advisory Board Member (\$5,000)** you are entitled to:

- 2 Tickets to the Presidential Trust Dinner

As a current and active **President's Club Member (\$1,000)** you are entitled to:

- 1 Ticket to the Presidential Trust Dinner

**Member gives \$25,000 and raises additional \$25,000.*

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REPUBLICAN NATIONAL COMMITTEE CO-CHAIRMAN
JO ANN DAVIDSON

CORDIALLY REQUESTS
THE HONOR OF YOUR PRESENCE AT THE

Republican Women's Exchange
Leadership Breakfast

WEDNESDAY, OCTOBER 17, 2007
FOUR SEASONS HOTEL
WASHINGTON, DC
8:30 A.M.

FEATURING SPECIAL GUEST

Mrs. Laura Bush

PLEASE R.S.V.P. BY CALLING KATHLEEN WILBER AT [REDACTED]

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You are cordially invited to a
New Republican Regents Dinner
hosted by the
Republican National Committee
with
President George W. Bush

Thursday, November 1, 2007

4:30 p.m.

At the home of:
Suzy and Bob Pence



Business Attire

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You are cordially invited to a

Luncheon

hosted by the

Republican National Committee

with

**President George W. Bush
and Mrs. Laura Bush**

Tuesday, December 4, 2007

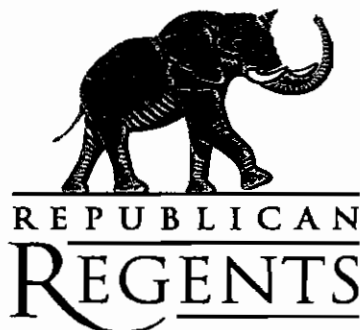
10:30 a.m.

Evermay
1623 28th Street, Northwest
Washington, D.C.

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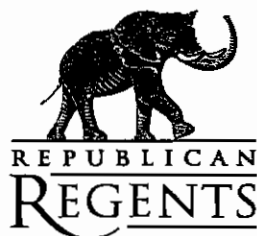


Republican Regents Calendar of Events

- | | |
|-----------------------------|---|
| January 30, 2008 | Luncheon with President George W. Bush
Los Angeles, CA |
| January 30, 2008 | Dinner with President George W. Bush
Hillsborough, CA |
| February 15-18, 2008 | Major Donor Winter Retreat
Los Angeles, California |
| May 14-15, 2008 | Spring Meeting and Gala
Washington, D.C. |
| August 31-September 5, 2008 | Republican National Convention
Minneapolis/St. Paul, Minnesota |

Additional dates to follow.
For more information, please contact Heather Godwin
at [REDACTED]

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**2008 Republican National Committee Regents
Calendar of Events**

RNC Major Donor Cocktail Reception

With Special Guest President George W. Bush

June 24, 2008

Home of Martha and Dwight Schar

McLean, Virginia

Republican Regents Retreat

With Special Guest President George W. Bush

July 16-18, 2008

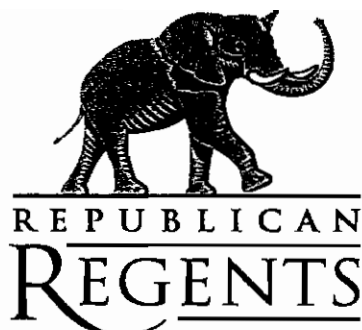
Napa Valley, California

GOP Convention

August 31-September 4, 2008

Minneapolis/St. Paul, MN

For additional information please contact Heather Godwin, Regents Director at [REDACTED] or Heather Jeffreys, Regents Assistant at [REDACTED]



2008 REPUBLICAN REGENTS MEMBERSHIP BENEFITS

NATIONAL MEETINGS

The Regents host a minimum of two national meetings throughout the U.S. each year. At these events, members meet with national political figures to discuss the policies and future of the Republican Party. Members participate in Issue Forums with these leaders and receive briefing material on current issues, polling and public surveys. In addition, social activities such as golf tournaments, boating excursions and private dinners are also planned.

2008 RNC ANNUAL GALA

Each year the RNC hosts its largest gala fundraising event in Washington, D.C. Regents' members enjoy participating in small policy and social events with Republican experts, leaders and celebrities, as well as a minimum of two complimentary tickets to the gala.

REGIONAL EVENTS

Regional Events provide the opportunity to meet with RNC leadership and elected Republican leaders in a more relaxed and intimate social setting in your own region.

2008 NATIONAL FINANCE COMMITTEE

As a Regent member you are also a member of our National Finance Committee. The National Finance Committee includes those that donate significantly to the RNC as well as those that raise money for our national Party. Conference calls are arranged on a regular basis for NFC members to interact with Republican leaders. These calls serve as a vehicle for members to discuss with the policy makers of our party those political issues that concern them the most.

Page 2
2007 Regents Benefits

RNC COMMUNICATIONS

Members regularly receive RNC communications on current legislative topics, Chairman's Updates, and the RNC's magazine.

RNC STAFF

The REGENTS staff in Washington, D.C. is available to answer questions regarding membership, upcoming activities or for any assistance with appointments. Our staff provides any needed political or legislative information as well as information on federal contribution guidelines and assuring compliance with those guidelines. Kevin Niehaus, Regents Director is available at [REDACTED]
[REDACTED]

Karl Rove

Join us for a Majority Fund Luncheon

Featuring

Former Senior Advisor and Deputy Chief of Staff

Karl Rove

at

Charlie Palmer Steak

101 Constitution Avenue, NW
Washington, DC 20001

January 15, 2008

12:00 PM



**RSVP with
Kathleen Wilber**



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RNC000094



2008 MAJOR DONOR

Winter Retreat

RNC MAJOR DONOR
WINTER RETREAT

The Beverly Wilshire Hotel
LOS ANGELES, CA

FEBRUARY 15-18, 2008

*For room reservations please call
The Beverly Wilshire Hotel
at 310-275-5200 and ask
for the RNC 2008
Winter Meeting room block.*

*For more information please contact
Annie McEniry at [REDACTED]*



- Yes, I would like to attend the 2008 Major Donor Winter Retreat and I will renew my Regents membership for 2008 (\$28,500 from the member and \$28,500 from his/her spouse or colleague for a total of \$57,000).
- No, I am unable to attend the 2008 Major Donor Winter Retreat, but I will renew my Regents membership for 2008 (\$28,500 from the member and \$28,500 from his/her spouse or colleague for a total of \$57,000).

For questions on your membership, the Regents staff can be reached at [REDACTED]. Space is limited, please respond at your earliest convenience.

Please mail your contribution to the following address:
 Republican National Committee
 ATTN: Winter Meeting
 310 First Street, S.E.
 Washington, D.C. 20003

Please make your check payable to: RNC
 Please see reverse side for important contributor information.

YOU MAY MAKE YOUR 2008 CONTRIBUTION BY CREDIT CARD IF YOU CHOOSE BY COMPLETING THE INFORMATION BELOW. (Note: Credit card must be personal, not corporate.)

Type of credit card: Visa MasterCard
 American Express Discover

Credit Card Number _____

Expiration Date _____ Amount of Gift \$ _____

Name as it Appears on Card _____

Signature _____



Funds received in response to this solicitation will be subject to federal contribution limits. Federal election law requires us to report the following information*:

NAME* _____ DOB _____ SS# _____
 GUEST* _____ DOB _____ SS# _____
 ADDRESS* _____
 CITY* _____ STATE* _____ ZIP* _____
 MAIN CONTACT NUMBER _____ WORK NUMBER _____
 HOME NUMBER _____ CELL NUMBER _____
 FAX NUMBER _____ EMAIL ADDRESS (h) _____
 EMAIL ADDRESS (w) _____
 OCCUPATION* _____
 EMPLOYER* _____

PLEASE CHECK IF SELF-EMPLOYED*

YOU MAY MAKE YOUR 2008 CONTRIBUTION BY CREDIT CARD IF YOU CHOOSE BY COMPLETING THE INFORMATION BELOW.
 (Note: Credit card ~~must~~ be personal, not corporate.)

Type of credit card:

Visa MasterCard American Express Discover

CREDIT CARD NUMBER _____
 EXPIRATION DATE _____
 NAME AS IT APPEARS ON CARD _____
 SIGNATURE _____
 AMOUNT OF GIFT \$ _____

**Majority Fund RSVP
 2008 Spring Gala**

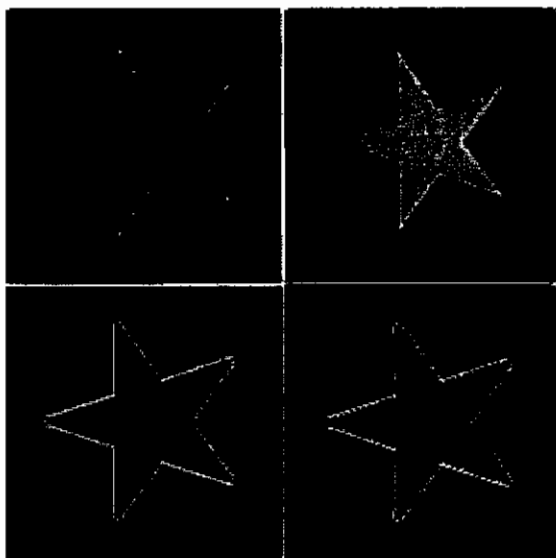
For questions on your membership, the Majority Fund staff can be reached at [redacted]. Space is limited, please respond at your earliest convenience.

- Yes**, I would like to attend the dinner. I will renew my **Majority Fund** membership for 2008 and make a contribution to McCain Victory 2008 and GELAC for \$25,000.
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to McCain Victory 2008. I will renew my **Majority Fund** membership for 2008 and make a contribution to GELAC for \$20,000.
- Yes**, I would like to attend the dinner. I have already contributed the maximum amount to McCain Victory 2008 and GELAC. I will renew my **Majority Fund** membership for \$15,000.
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to the RNC for 2008. I will contribute \$5,000 to McCain Victory 2008 and \$5,000 to GELAC.
- Yes**, I would like to attend the dinner. I have already contributed the maximum amount for 2008.
- No**, I am unable to attend the dinner. I have enclosed my contribution of \$_____ in accordance with the enclosed regulations.

PLEASE MAKE CHECKS PAYABLE TO MCCAIN VICTORY 2008

Please fax your contribution form to [redacted].
 Please call for an Express Shipping account number for mailed contributions.

Republican National Committee
 ATTN: 2008 Spring Gala, Third Floor
 310 First Street, SE
 Washington, DC 20003



Contributions to McCain Victory 2008 are not deductible as charitable contributions for federal income-tax purposes. McCain Victory 2008 allocates contributions to John McCain 2008, John McCain 2008 General Election Compliance Fund, the Republican National Committee, and state parties' federal accounts in compliance with federal limits. Unless a contribution would exceed federal limits or a contributor designates otherwise, McCain Victory 2008 will divide contributions as follows:

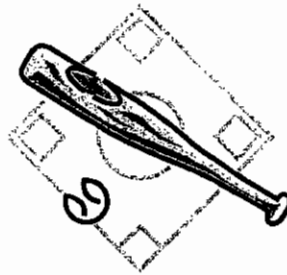
- For Individuals—The first \$2,300 to JM 2008, the next \$2,300 to the Compliance Fund, the next \$28,500 to the RNC, and the balance of up to \$37,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.
- For Couples—The first \$4,600 to JM 2008, the next \$4,600 to the Compliance Fund, the next \$57,000 to the RNC, and the balance of up to \$74,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.
- For Federal Multicandidate PACs—The first \$5,000 to JM 2008, the next \$5,000 to the Compliance Fund, the next \$15,000 to the RNC, and the balance of up to \$20,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.

Contributions to the Compliance Fund will be used solely for legal and accounting services to ensure compliance with federal law and not for campaign activities. Compliance funds may defray a portion of broadcast advertising, national and state office "overhead", and computer/website expenses. Contributions from corporations, labor unions, federal contractors, and foreign nationals without permanent residency status to McCain Victory 2008 are prohibited. *Federal law requires us to report the name, address, occupation, and employer of any contributor who gives more than \$200 in an election cycle (for JM 2008 and Compliance Fund contributions) or more than \$200 in a calendar year (for RNC and state-party contributions).



**Join us for a Majority Fund
night at the ballpark!**

**Washington Nationals
vs.
St. Louis Cardinals**



Tuesday, June 3, 2008
Please join us for the
Pre-Game
at
6:30 p.m.

Game starts at 7:10 p.m.

For more information please contact
Annie McEniry at [REDACTED] or [REDACTED].
Spaces are limited!

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Major Donor
SUMMER RECEPTION

You are cordially invited to a
COCKTAIL RECEPTION

hosted by the
Republican National Committee

Featuring

PRESIDENT
GEORGE W. BUSH

Tuesday, June 24, 2008

4:30 pm

HOME OF MARTHA & DWIGHT SCHAR



Contributions to the Republican National Committee are not tax deductible as charitable contributions for federal income tax purposes.
Contributions from corporations and foreign nationals are prohibited.

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Major Donor
SUMMER RECEPTION

R * S * V * P

*For questions on your membership, please contact
Kathleen Wilber at [REDACTED] or
[REDACTED]. Space is limited,
please respond at your earliest convenience.
You may RSVP by fax at [REDACTED].*

- Yes, I would like to attend the photo-op and cocktail reception and I will renew my Regents membership for 2008 for \$57,000.
- No, I am unable to attend the photo-op and cocktail reception, but I will renew my Regents membership for 2008 for \$57,000.

Please mail your contribution to the following address:

Republican National Committee
ATTN: Major Donor Summer Reception
310 First Street, S.E.
Washington, D.C. 20003





PLEASE JOIN US

FOR A

Regents-only
RETREAT

IN

Napa Valley

FEATURING

PRESIDENT GEORGE W. BUSH

JULY 16 – 18, 2008

FOR FURTHER DETAILS, PLEASE CONTACT

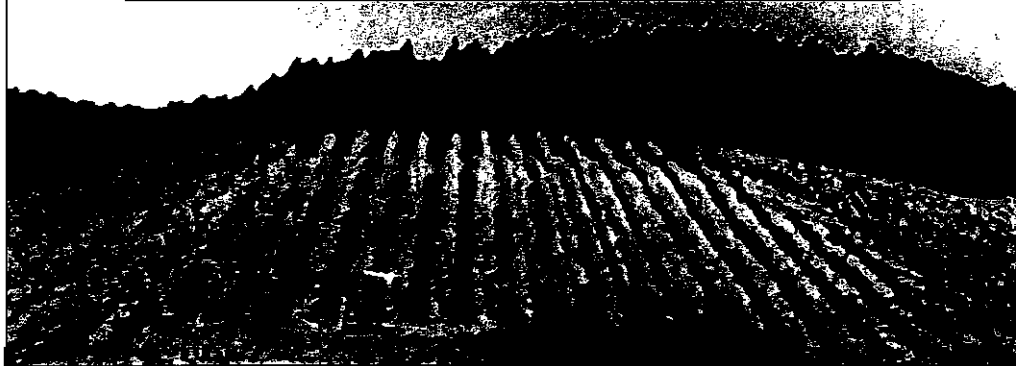
REGENTS DIRECTOR HEATHER GODWIN

AT [REDACTED] OR [REDACTED]

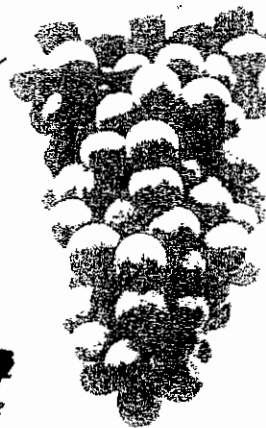
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REGENTS-ONLY
RETREAT IN
Napa Valley
R.S.V.P.



*For questions on your membership, please contact
Regents Director Heather Godwin at [REDACTED]
or [REDACTED]. Space is limited, so please
respond at your earliest convenience. You may RSVP
by fax at [REDACTED].*

- Yes, I would like to attend the Regents-Only Retreat in Napa Valley and I will renew my Regents membership for 2008 for \$57,000.
(\$28,500 from me and \$28,500 from my spouse or colleague.)
- No, I am unable to attend the Regents-Only Retreat in Napa Valley, but I will renew my Regents membership for 2008 for \$57,000.
(\$28,500 from me and \$28,500 from my spouse or colleague.)



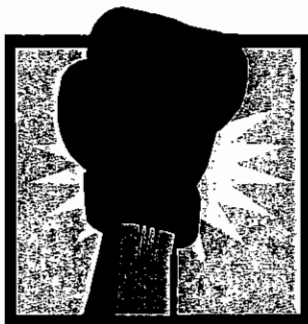
Please mail your contribution to the following address:

Republican National Committee
ATTN: Napa Valley Regents-Only Retreat
310 First Street, S.E.
Washington, D.C. 20003



YOUNG EAGLES

Present



Fight for More Members!

July 25-26, 2008

**Welcome Reception and Dinner at
SW Steakhouse**

The Wynn Las Vegas

Featuring Senator John Ensign

July 25th

8:30 p.m.

<p><i>Fight Night in Las Vegas</i></p> <p>Miguel Cotto (32 wins, 26 KO's)</p> <p>vs.</p> <p>Antonio Margarito (36 wins, 26 KO's)</p> <p><i>July 26, 2008 MGM Grand Hotel 8:30 p.m.</i></p>

☆Premier Seating☆

Post-Fight Reception

July 26th

Tao



*RNC Chairman Mike Duncan
Cordially Invites You to a
Majority Fund Luncheon
Featuring:*

Senator John Thune

*With a Political Update by
RNC Political Director Rich Beeson*

*Thursday, September 25th, 2008
12:00 p.m.*

*Wolfgang Puck
The Source*

575 Pennsylvania Avenue NW

For more information please contact
Annie McEniry at [REDACTED] or [REDACTED]
Spaces are limited!

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Please join us for a

Republican National Committee
Major Donor Fall Retreat

in

Kiawah Island
SOUTH CAROLINA

featuring

*President George W. Bush
and Laura Bush*

October 9 – 11, 2008

The Sanctuary at Kiawah Island
One Sanctuary Beach Drive
Kiawah Island, South Carolina

For further details, please contact Annie McEniry
at [REDACTED] or [REDACTED]

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Major Donor
FALL RETREAT

R * S * V * P

*For questions on your membership, please contact
Kevin Niehaus at [REDACTED] or
[REDACTED] Space is limited,
please respond at your earliest convenience.
You may RSVP by fax at [REDACTED]*

- Yes, I would like to attend the Republican National Committee Major Donor Fall Retreat and I will renew my Regents membership for 2008 for \$57,000.
- No, I am unable to attend the Republican National Committee Major Donor Fall Retreat, but I will renew my Regents membership for 2008 for \$57,000.

Please mail your contribution to the following address:

Republican National Committee
ATTN: Major Donor Fall Retreat
310 First Street, S.E.
Washington, D.C. 20003





REPUBLICAN REGENTS Fact Sheet and Benefits

Mission Statements

Republican Regents Program

To rebuild the Republican Party one donor at a time while maintaining a tradition of excellence in the Republican National Committee's most prestigious major donor program.

Republican Regents Membership

To present forums in which like-minded individuals participate in the political process, communicate their views directly to Party leadership and enjoy the company of friends at events in Washington, D.C. and other appealing destinations.

Regents Staff

To expand and advance the Regents program and serve members with the highest possible quality, consistency and efficiency.

Facts

- ☆ Membership in Republican Regents is an annual commitment of \$30,400 for the member and another \$30,400 contribution by the member's spouse or colleague, totaling \$60,800 in 2009 or they must raise \$200,000 in 2009.
- ☆ The Republican Regents major donor club is the most prestigious and recognized Major Donor Program at the Republican National Committee.
- ☆ The Republican Regents supports the lifeblood of the Party, GOP candidates, at every level, every year.

Benefits/Events

- ☆ National Meetings – There are up to three 2-day national meetings each year. They typically include briefings and interactive panels with elected officials and policy experts, along with some combination of golf, tennis, entertainment and relaxation.
- ☆ Regional Meetings – These meetings are held across the country many times throughout the year. They serve as an opportunity for active members to bring together lawmakers from their home states for candid discussions in an intimate environment. Members are encouraged to bring friends or colleagues who are interested in exploring a Regents membership. In many cases, active members host these events with the assistance of the Regents staff.

Key Staff

OPEN
Finance Director, RNC [REDACTED]

Ms. Debbie LeHardy
Deputy Finance Director [REDACTED]

OPEN
Director, Republican Regents [REDACTED]

Ms. Heather Jeffreys
Staff Assistant to the Regents [REDACTED]

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TEAM



TEAM 100 BENEFITS

NATIONAL MEETINGS

TEAM 100 hosts a minimum of two National meetings throughout the U.S. each year. At these events members meet with national political figures to discuss the policies and future of the Republican Party. Members participate in Issues Forums with these leaders and receive informative briefing materials on current issues, polling and public surveys. Previous guests have included Presidents Ronald Reagan and Gerald Ford, The Honorable Elaine Chao, former Secretary of Commerce Don Evans, Ambassador Paul Bremmer, Senators George Allen, and Norm Coleman, Speaker Dennis Hastert, and Governors George Pataki and John Engler. In addition, social activities such as golf and tennis tournaments, boating excursions and private dinners are also planned.

RNC ANNUAL GALA

Each year the RNC hosts its largest gala fundraising event in Washington, D.C. TEAM 100 members enjoy small, private events with elected Republican leaders and celebrities, as well as premier seating and two complimentary tickets. VIPs from past Galas include former Presidents Ronald Reagan and George Bush, Lady Margaret Thatcher, singer Natalie Cole, actors Charlton Heston and Arnold Schwarzenegger, and a host of presidential hopefuls.

REGIONAL EVENTS

Regional events provide the opportunity to meet with RNC leadership and elected Republican leaders in a more relaxed and intimate social setting in your own region.

NATIONAL FINANCE COMMITTEE

As a TEAM 100 member you are also a member of our National Finance Committee. The National Finance Committee includes those who donate significantly to the RNC as well as those who raise money for our national Party. Conference calls are arranged on a regular basis for NFC members to interact with Republican leaders. These calls serve as a vehicle for members to discuss with the policy makers of our party those political issues which concern them the most.

T E A M



TEAM 100 BENEFITS continued

RNC COMMUNICATIONS

Members regularly receive RNC communications on current legislative topics, Chairman's Updates, and RNC's magazine.

RNC STAFF

The TEAM 100 staff in Washington, D.C., is available to answer questions regarding membership, upcoming activities or for any assistance with appointments. Our staff provides any needed political or legislative information as well as information on federal contribution guidelines and assuring compliance with those guidelines. TEAM 100 Director Heather Godwin is available at [REDACTED]

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Fact Sheet and Benefits

Mission Statements

TEAM 100 Program

To rebuild the Republican Party one donor at a time while maintaining a tradition of excellence in one of the Republican National Committee's most effective and respected leadership groups.

TEAM 100 Membership

To present forums in which like-minded individuals participate in the political process, communicate their views directly to Party leadership and enjoy the company of friends at events in Washington, D.C. and other appealing destinations.

TEAM 100 Staff

To expand and advance the TEAM 100 program and serve members with the highest possible quality, consistency and efficiency.

Facts

- ☆ A TEAM 100 membership requires a \$30,400 personal contribution, per year.
- ☆ TEAM 100 supports the lifeblood of the Party, GOP candidates, at every level, every year.

Benefits/Events

- ☆ National Meetings – There are up to three 2-day national meetings each year. They typically include briefings and interactive panels with elected officials and policy experts, along with some combination of golf, tennis, entertainment and relaxation.
- ☆ Regional Meetings – These meetings are held across the country many times throughout the year. They serve as an opportunity for active members to bring together lawmakers from their home states for candid discussions in an intimate environment. Members are encouraged to bring friends or colleagues who are interested in exploring TEAM 100 membership. In many cases, active members host these events with the assistance of the TEAM 100 staff.

Key Staff

Ms. Debbie LeHardy
Deputy Finance Director • [REDACTED]

TEAM 100 Fax
[REDACTED]

Ms. Heather Jeffreys
TEAM 100 and Regents Assistant • [REDACTED]

Finance Division
[REDACTED]

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REPUBLICAN EAGLES Fact Sheet and Benefits

Mission Statements

Republican Eagles Program

To rebuild the Republican Party one donor at a time while maintaining a tradition of excellence in the Republican National Committee's most established major donor program.

Republican Eagles Membership

To present forums in which like-minded individuals participate in the political process, communicate their views directly to Party leadership and enjoy the company of friends at events in Washington, D.C. and other appealing destinations.

Eagles Staff

To expand and advance the Eagles program and serve members with the highest possible quality, consistency and efficiency.

Facts

- ☆ A Republican Eagles membership requires a \$15,000 personal contribution, per year.
- ☆ The Republican Eagles major donor club is the oldest and most recognized Major Donor Program at the Republican National Committee.
- ☆ The Republican Eagles supports the lifeblood of the Party, GOP candidates, at every level, every year.

Benefits/Events

- ☆ National Meetings – There are up to three 2-day national meetings each year. They typically include briefings and interactive panels with elected officials and policy experts, along with some combination of golf, tennis, entertainment and relaxation.
- ☆ Regional Meetings – These meetings are held across the country many times throughout the year. They serve as an opportunity for active members to bring together lawmakers from their home states for candid discussions in an intimate environment. Members are encouraged to bring friends or colleagues who are interested in exploring Eagles membership. In many cases, active members host these events with the assistance of the Eagles staff.

Key Staff

OPEN

Finance Director, RNC [REDACTED]

Ms. Debbie LeHardy

Deputy Finance Director [REDACTED]

OPEN

Director of Republican Eagles [REDACTED]

Mr. William Crozer

Young Eagles Coordinator [REDACTED]

Eagles Fax

[REDACTED]

Finance Division

[REDACTED]

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YOUNG EAGLES

Fact Sheet and Benefits

Overview

Young Eagles Program

- To shape the future of our nation by providing our Party with the capability to compete and succeed in every election—at every level.
- Define the future leaders of tomorrow by creating a vibrant base of young, conservative oriented members that can and will take an active role in shaping the party's message, as well as that of the country, well into the future.

Young Eagles Membership

- To present a forum in which individuals from across the country can participate in the political and legislative process, communicate their views directly to Party leadership, and enjoy the company of friends and colleagues at events in such venues as Washington, D.C., New York, Miami and other appealing destinations.
- To provide valuable networking opportunities for our members. Through national, as well as regional meetings, members will have the opportunity to interact with leading political and business leaders, as well as fellow members, from around the country.

Young Eagles Roundtable

- Offered to the most active members of the Young Eagles, the Young Eagles Roundtable offers unprecedented opportunities within the Republican Party and the Republican National Committee. Benefits include access to invitation only events, exclusive conference calls with party leadership and officials, as well as special recognition.



YOUNG EAGLES

Facts

Membership

- Open to individuals 45 years of age and younger.
- A full year's membership in the Young Eagles requires a \$7,500 personal contribution per year. All benefits included. ****Contribution options available****
- On occasion, prospective members will have the opportunity to attend events based on a \$1,500 meeting fee. This fee may be applied towards a full membership.

Raising

- Individuals who raise \$15,000 will receive:
 - A half year's membership to the Young Eagles including all benefits.
 - An invitation to a special event.
- Individuals who raise \$30,000 or more will receive:
 - A complimentary one year membership to the Young Eagles including all benefits.
 - Invitations to special events.
- Individuals who raise \$45,000 or more will receive:
 - A complimentary one year membership to the Young Eagles including all benefits.
 - Membership on the Young Eagles Roundtable with all benefits included.
 - Invitations to special events.

Staff

- William Crozer – Young Eagles Coordinator
 - (p) [REDACTED]
 - (f) [REDACTED]
 - (e) [REDACTED]



YOUNG EAGLES

Benefits/Events

- ☆ **National Meetings:** There are up to three 2-day national meetings each year. These meetings include all major donor clubs at the RNC and typically include briefings and interactive panels with elected officials and policy experts, along with some combination of golf, tennis, entertainment and relaxation. While these meetings are substantive, members also have the opportunity to network, meet new friends, and catch up with old ones in exclusive surroundings.
- ☆ **Regional Meetings:** These meetings are held across the country many times throughout the year. Venues include, but are not limited to Miami, New York, Los Angeles, Atlanta, and Dallas. Regional meetings serve as an opportunity for active members to bring together lawmakers from their home states for candid discussions in an intimate environment. Members are encouraged to bring friends or colleagues who are interested in exploring Young Eagles membership.
- ☆ **Two tickets to the Republican National Committee Presidential Gala** which is held in conjunction with the spring national meeting.
- ☆ **Conference Calls:** Active members have the benefit of participating on conference calls that allow them to interact with Party leadership and elected officials. These calls address topics such as legislation, campaigns, and other political matters.
- ☆ **Website:** The Young Eagles website hosts a variety of features including a blog, updated membership information, a calendar of events, profiles of fellow donors and raisers, as well as access to various components of the GOP website.

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MAJORITY FUND Fact Sheet and Benefits

Mission Statements

Majority Fund Program

To shape the future of our nation by providing our Party the capability to compete and succeed in every election—at every level.

Majority Fund Membership

To present a forum in which individuals from across the country can participate in the political and legislative process, communicate their views directly to Party leadership and enjoy the company of friends at events in Washington, D.C. and other appealing destinations.

Facts

- ☆ A Majority Fund membership requires a \$15,000 PAC contribution, per year.
- ☆ Majority Fund supports the lifeblood of the Party, GOP candidates, at every level, every year.

Benefits/Events

- ☆ Local Luncheons – These luncheons are held in various Washington, D.C. restaurants throughout the year. They serve as an opportunity for Majority Fund members to interact with colleagues, political officials, the Chairman of the RNC, and other VIPs.
- ☆ National Meetings – There are up to three 2-day national meetings each year. They typically include briefings and interactive panels with elected officials and policy experts, along with some combination of golf, tennis, entertainment and relaxation.

Key Staff

OPEN
Finance Director, RNC [REDACTED]

Ms. Debbie LeHardy
Deputy Finance Director [REDACTED]

Ms. Annie McEniry
Director, Majority Fund [REDACTED]

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*The Republican National Committee
Cordially Invites You to a
Majority Fund Luncheon
Featuring:*

Congressman Paul Ryan

*Thursday, February 12, 2009
12:00 p.m.
The Capital Grille
601 Pennsylvania Ave., NW*

For more information please contact
Annie McEniry at [REDACTED] or [REDACTED]
Spaces are limited!

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2009 MAJORITY FUND MEMBERSHIP STATEMENT/INVOICE

PAC: _____

PAC Contact Name(s): _____

Phone: _____ Email: _____

<u>Membership</u>	
1. 2009 Majority Fund Membership Contribution	\$15,000
☆ 2 invitations to Majority Fund Events through 2009	
☆ 2 invitations to Republican Eagles Events through 2009	
☆ 2 invitations to the RNC Regional Meetings in 2009	
<i>Please make check(s) payable to Majority Fund</i>	

Majority Fund members may only contribute with Federal PAC funds. Contributions are subject to federal contribution limits and are used to fund all RNC programs including direct candidate support. Federal PAC contributions to the RNC are limited to \$15,000 per calendar year.

TOTAL ENCLOSED \$ _____

Please return this statement with your Majority Fund contribution(s) and mail them to:

Majority Fund
Attn: Annie McEniry
RNC-Finance Division
310 First St., SE
Washington, DC 20003

Federal law requires that we report the following information:

Occupation: _____ Employer: _____

Please check if self-employed

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If returning via fax, please fax to [REDACTED]

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Restore. Rebuild.

Getting back to basics... at the Breakers.

Please join us for the



2009 RNC MAJOR DONORS

Winter Retreat

The Breakers, Palm Beach

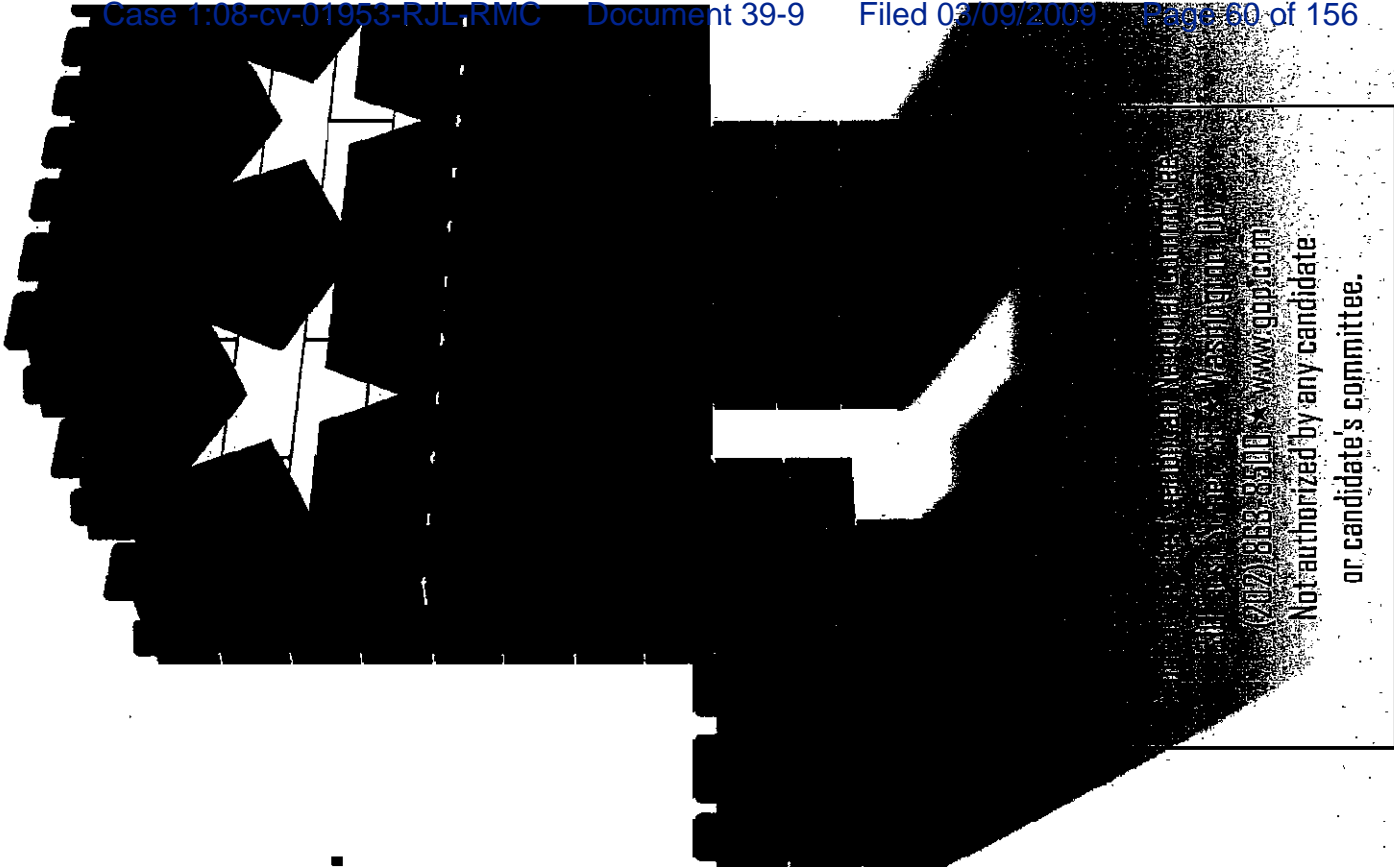
Feb 19-21, 2009

Hotel reservations must be made directly by calling The Breakers
1-888-BREAKERS and ask for the RNC Room Block.

Please RSVP to Kathleen Wilber

(email)

RNC000142



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MARC RACICOT
CHAIRMAN



ANN WAGNER
CO-CHAIRMAN

ACK OLIVER
DEPUTY CHAIRMAN

March 7, 2003

Mr. Edward N. Robinson



Dear Mr. Robinson:

On April 2, The President's Club will host a private dinner for Club Members in Dallas, Texas. I hope you will join me for what is certain to be an entertaining and informative evening.

The dinner will be held at the Hyatt Regency Dallas, at 5:30 pm. This is just one of the many benefits of your membership in The President's Club and a way for us to thank you for your commitment to President Bush, our Party and our country.

Karen Hughes will join us and speak about the President's agenda and the current legislative session in Congress. This is also an excellent opportunity for you to gather with friends and meet new members of The President's Club from Texas.

Your generous support for President Bush and our Party last year was outstanding. Your dedication led to the election of a Republican Congress and hundreds of GOP officeholders at the state and local level. I hope we can count on your continued support during the coming year for the President and our Leadership in Congress.

Please call Sean Miller, The President's Club director, with any questions you may have in regards to the dinner at [REDACTED]. I hope you will join us on April 2 and I look forward to working with you in the months ahead to advance our Party's cause. Thank you.

Sincerely,
Marc Racicot

Marc Racicot
RNC Chairman

P.S. To RSVP for The President's Club dinner on April 2 at the Hyatt Regency Dallas, return the enclosed reply form by March 26 or call The President's Club office at [REDACTED] or email at [REDACTED]. I hope you can join us for this special evening -- it will certainly be one you don't want to miss. MR

Republican National Committee
The President's Club
TEXAS DINNER INVITATION REPLY



Mr. Edward N. Robinson
[REDACTED]

P03EB25C
137099510

Dear Chairman Racicot:

- Yes! I will attend the special President's Club dinner at the Hyatt Regency Dallas located at 300 Reunion Boulevard in Dallas, Texas on April 2.
- No, I cannot attend the special President's Club dinner in Dallas, Texas on April 2. Thank you for the invitation, and please keep me in mind for future regional events. I would, however, like to make a special President's Club contribution to support President Bush and keep our Party moving forward. I am enclosing a contribution of:

\$1,000 \$500 \$250 Other \$ _____

Please make check payable to: The President's Club

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REPUBLICAN NATIONAL COMMITTEE

Presidential Gala

August 20, 2003

Mr. James W. Diamond

Dear Mr. Diamond:

It is my very great privilege to extend this personal invitation to you to join President Bush, Republican Members of Congress and national Party leaders in Washington, D.C. this October 7th and 8th for two very important events:

- The RNC 2003 Presidential Gala which will kick off our Party's march to the 2004 Republican National Convention in New York where we will nominate the Republican nominee for President of the United States;
- And the Fall National Meeting of The President's Club.

Mr. Diamond, I have taken the liberty of tentatively reserving a Gala and meeting ticket in your name, but I must emphasize that space is limited.

The RNC Presidential Gala is a festive black tie VIP event saluting President Bush and commencing our drive for Republican victory in the 2004 election cycle.

It is also a formal opportunity for our Party's core supporters to thank President Bush for his steady leadership during the challenging times America has faced -- and for returning honor and integrity to the White House.

This is one gathering you won't want to miss and I sincerely hope you are able to attend.

To reserve your ticket to the Gala, please return the enclosed RSVP by September 12. As an active member of The President's Club, you are entitled to one complimentary Gala ticket. Additional guest tickets may be purchased for \$1,000 each.

The Fall National Meeting of The President's Club is being held in conjunction with the Gala, both events will be held at the Hilton Washington. I have enclosed a tentative agenda for your review.

On the evening of October 7 a welcoming reception and dinner featuring former Speaker of the House, Newt Gingrich, will be held. The official meeting schedule begins on the morning of October 8 with detailed briefings from top Republican campaign experts and issue discussions with leading GOP congressional members and policymakers. That evening you'll join supporters from across the country to salute President George W. Bush at our annual Gala.

(Next page, please...)

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET, SOUTHEAST ☆ WASHINGTON, D.C. 20003 ☆ (202) 863-8720 ☆ (800) 762-8564 ☆ FAX: (202) 863-8634 ☆ WWW.RNC.ORG
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CONTRIBUTIONS TO THE RNC ARE NOT TAX DEDUCTIBLE.

RNC000153

Page Two – Mr. James W. Diamond

The Fall National Meeting will be an exciting start to our Party's drive for sweeping Republican victories from the Court house to the White House in '04.

I hope you will remain active in The President's Club for the upcoming year as your benefits include not only the Gala, but also:

- ❖ VIP credentials for you to events during the Republican National Convention in New York next summer;
- ❖ Access to The President's Club members-only website featuring regular online chat sessions and insider briefings to keep you up-to-date on the latest campaign developments;
- ❖ An invitation to the RNC's election night watch party in Washington, D.C.
- ❖ And priority invitations to the Republican Inaugural and related events in January 2005.

So take advantage of all The President's Club has to offer and join us for the annual RNC Presidential Gala.

After all, it is your commitment and dedication to the Republican principles and values President Bush and our Party champion that has made us America's Majority Party. And it will take the continued hard work and determination of President's Club members like you to lead our Party to victory in 2004.

Please return your RSVP by September 12 to reserve your spot at the RNC 2003 Presidential Gala. If you will also be attending The President's Club Fall National Meeting, be sure to include a conference fee of \$200 to cover meeting related expenses.

If you cannot attend, I hope you will consider sending a special President's Club contribution -- \$1,000, \$500, even \$250 if you can -- to support President Bush's agenda and help make our Gala a success.

We cannot win this fall and next November without your continued participation. I look forward to hearing from you soon and seeing you in Washington on October 7 and 8. Thank you.

Sincerely,



Ed Gillespie
RNC Chairman

P.S. The 2003 RNC Presidential Gala will honor President Bush's responsible agenda and serve as the kickoff to our drive for victory in 2004. Please return your RSVP by September 12 to ensure the best possible accommodations. You may also RSVP by calling The President's Club staff at [REDACTED] or e-mail: [REDACTED]. To confirm your attendance at The President's Club Fall National Meeting, please include a conference fee of \$200, along with the most generous special contribution you can afford. I hope to hear from you today. Thank you.

REPUBLICAN NATIONAL COMMITTEE

Presidential Gala

Gala and Fall National Meeting RSVP

Mr. James W. Diamond

P03EE25C
108371137

The 2003 Republican National Committee Presidential Gala will be held October 8, 2003 at the Hilton Washington in Washington, D.C. The Gala is being held in conjunction with the Fall National Meeting of The President's Club on October 7-8.

RNC PRESIDENTIAL GALA:

- I wish to attend the RNC Presidential Gala to help kick off our drive to the Republican National Convention in New York and victory in the 2004 presidential election cycle.
- In addition, I have enclosed an additional payment of _____ to purchase _____ guest ticket(s) @ \$1,000.

THE PRESIDENT'S CLUB:

- I will also attend The President's Club Fall National Meeting on October 7-8. I am enclosing an additional payment of \$200 for the conference fee.

Please indicate the event you will be attending:

October 7, 2003	Member	Guest
Welcome Reception & Dinner	<input type="checkbox"/>	<input type="checkbox"/>
October 8, 2003		
Breakfast Session	<input type="checkbox"/>	<input type="checkbox"/>
RNC Briefing	<input type="checkbox"/>	<input type="checkbox"/>
Discussion Panel	<input type="checkbox"/>	<input type="checkbox"/>
Luncheon	<input type="checkbox"/>	<input type="checkbox"/>
2003 RNC Gala	<input type="checkbox"/>	<input type="checkbox"/>

- I cannot attend the RNC Gala or The President's Club Fall National Meeting, but I know we must prepare now for the 2004 presidential election cycle. To help support President Bush's agenda, the Republican Congress and GOP candidates at all levels, I am enclosing a special President's Club contribution of:
 - \$1,000 \$500 \$250 \$ _____ Other

Please make your personal checks payable to **The President's Club**. Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

If you are attending the Gala and/or the Fall National Meeting of The President's Club:

The President's Club has reserved blocks of rooms at the Hilton Washington in downtown Washington, D.C. Please make your reservations as soon as possible by directly calling the Hilton Washington at 888-DC-HILTON. Please ask for the special President's Club group rate of \$186 for a room.

RNC PRESIDENTIAL GALA 2003 BLACK TIE

REPUBLICAN NATIONAL COMMITTEE * 310 FIRST STREET, SOUTHEAST * WASHINGTON, D.C. 20003

Occupation*: _____

Employer*: _____

Please check if self-employed.*

Phone number: _____

Home mail address: (H) _____

(W) _____

Contributions from corporations and foreign nationals are prohibited.

You may make your contribution to The President's Club by credit card if you choose by completing the information below. (Note: credit card MUST be personal - not corporate.)

Type of Credit Card: VISA MasterCard Discover American Express Other _____

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Contribution: _____

Signature: _____

To have an immediate impact you may contribute to The President's Club online at www.mfcf.org.

If you're a new visitor, here's how you log-on to The President's Club home page.

To login:

1. Go to web page www.mfcf.org

2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."

3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.

4. Enter your password. If you are a new user, your password is [REDACTED]

5. Click "Log In" and you're in.

6. Read The President's Club and RNC news, and links to other political organizations in one site. Make The President's Club your home page and log on today!

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--

ED GILLESPIE
CHAIRMAN



ANN WAGNER
CO-CHAIRMAN

MARIA CINO
DEPUTY CHAIRMAN

December 29, 2003

Mrs. Barbara Wright
[REDACTED]

Dear Mrs. Wright:

One of the most important presidential election cycles in history is upon us...

...And it is crucial our Party's most loyal supporters are prepared and informed for what is certain to be a tough, hard fought battle.

Mrs. Wright, that makes your attendance at The President's Club Winter Meeting vital to our efforts next year.

The President's Club Winter National Meeting will be held in Washington, D.C. on January 20-21. You should have received a detailed information packet a few weeks ago along with my last letter outlining the agenda for this very special occasion.

To kick off the event, we will gather for an exclusive President's Club reception to watch the President's third State of the Union address to Congress. There will be several large screen televisions set up so you will not miss one word of the President's speech.

The remainder of our agenda will then focus on our Party's prospects for the 2004 elections. We will have representatives speak about the outlook for the presidential race, as well as members of Congress and other Party leaders to speak to you about congressional and state races around the country, as well as the pressing issues of the day.

To conclude the Winter National Meeting, we will gather Wednesday night at 6p.m. for a President's Club members' reception and dinner with special guest speaker Ken Mehlman, Campaign Manager, Bush/Cheney 2004.

I hope you will take part in the Winter National Meeting. As Chairman, I know our Party's leaders value hearing the insightful views and opinions of President's Club members.

(Over, please)

RNC000161

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET, S.E. • WASHINGTON, D.C. 20003 • 800-762-7764 • WWW.RNC.ORG

Page Two -- Mrs. Barbara Wright

So please return the RSVP form in the enclosed reply envelope to reserve your place at the 2004 Winter National Meeting. And when you do, I hope you will consider making a special President's Club contribution of \$250, \$500 or even \$1,000 to support President Bush and our leaders in Congress.

(A separate conference fee of \$225 will be charged to cover expenses of the meeting so all of your membership pledge can be dedicated to election programs. This amount will count towards your federal contribution limits.)

President George W. Bush has courageously led our country during challenging times. He has worked with the Republican Congress to strengthen homeland security, cut taxes and improve education.

But our work is far from done. Liberal Democrats will stop at nothing to win and thwart the President's agenda -- America's agenda -- once and for all.

Our Party faces many obstacles to nationwide success. The relentless dedication of President's Club members like you is crucial to helping elect GOP candidates from the Courthouse to the White House.

Thanks to your generous contributions we are laying the groundwork for victory next year. Your continued financial assistance and spirited participation will bolster our voter registration drives, get-out-the-vote initiatives and valuable campaign services our candidates need to win.

That is why your attendance at the 2004 Winter Meeting of The President's Club is so important. To register for the event, simply return the enclosed reply card or call The President's Club staff at [REDACTED]

Even if you cannot attend the Winter Meeting, I hope you will make a special President's Club contribution of \$1,000, \$500 or \$250 to support President Bush and to keep our Party moving forward.

Again, I truly appreciate your continuing support for our Party as we head into this critically important presidential election year, and I look forward to seeing you in Washington, D.C. on January 20th and 21st.

Sincerely,



Ed Gillespie
Chairman

P.S. If you have not already registered for The President's Club Winter National Meeting, I hope you will do so today. I don't want you to miss this crucial presidential election year meeting. It will be a great opportunity to interact with congressional leaders and top Party officials. If you have any questions regarding your membership status or to confirm your attendance for the 2004 Winter Meeting, please return the enclosed reply form by January 12th or call The President's Club staff at [REDACTED]. Thank you.



2004 Winter National Meeting & State of the Union Address

January 20-21, 2004

The Washington Court Hotel
525 New Jersey Avenue, NW • Washington DC 20001

Tuesday, January 20

12:00 p.m.-6:00 p.m. Check-In, RNC Hotel Office Location 7:00 p.m.-10:00 p.m. RNC State of the Union Evening Reception
Location: Atrium Ballroom

Wednesday, January 21

8:00 a.m.-3:00 p.m.	Check-In, RNC Hotel Office Location	12:15 p.m.	<u>Lunch Reception</u> Special Guest Speaker: <i>The Honorable Roy Blunt*</i> <i>House Majority Whip</i>
8:30 a.m.	Meeting Room Pledge of Allegiance, Call to Order Breakfast Speaker: RNC Chairman <i>Ed Gillespie*</i>	1:00 p.m.	<u>Outlook for 2004: Senate, House & the Presidency</u> RNC Deputy Chairman <i>Maria Cino*</i> NRSC Director <i>Jay Timmons</i> NRCC Director <i>Sally Vastola</i> Moderator: RNC Counsel <i>Mike Duncan*</i>
9:30 a.m.-10:20 a.m.	<u>Republican Women: A Congressional Perspective</u> <i>Congresswoman Jennifer Dunn (WA-8)*</i> <i>Congresswoman Ileana Ros-Lehtinen (FL-18)*</i> <i>Congresswoman Nancy Johnson (CT-5)</i> <i>Congresswoman Sue Kelly (NY-19)*</i> Moderator: RNC Counsel <i>Mike Duncan*</i>	Afternoon Free	
10:30 a.m.-11:30 a.m.	<u>Bush Cheney 04- An Election Update</u> <i>Mathew Dowd, Senior Strategist- Bush-Cheney 04</i> <i>Terry Nelson, Political Director- Bush-Cheney 04*</i> Moderator: RNC Counsel <i>Mike Duncan*</i>	6:00-9:30 p.m.	<u>Evening Reception & Dinner -Grand Ballroom</u> Guest Speaker: <i>Ken Mehlman</i> <i>Campaign Manager-Bush-Cheney 04</i>

Dress for meetings is business attire.
* Invited Guest, not confirmed.
All guest speakers are invited pending confirmation.
The agenda is subject to change.

Hotel Information

The Washington Court Hotel has been selected as the host hotel for The President's Club Winter National Meeting. A special room rate has been negotiated exclusively for President's Club members. The peak room block is January 20-21, 2004.

The Washington Court Hotel • 525 New Jersey Avenue, NW • Washington, DC 20001
(800) 321-3010 • 202-628-2100 • www.washingtoncourthotel.com

Accommodations: \$185 per night

Please note that room rates do not include applicable sales tax. You are responsible for arranging your own hotel accommodations.

The cut-off date for The President's Club room block is January 4, 2004.

Accommodations in The President's Club room block are available on a first-come, first-served basis.

For more information, please contact The President's Club office at [REDACTED] or [REDACTED]. Or visit our web site at [REDACTED].

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REPUBLICAN NATIONAL COMMITTEE

The President's Club

WINTER NATIONAL MEETING REGISTRATION

Mrs. Barbara Wright



P04EB25C
181141990

The 2004 Winter National Meeting of The President's Club will be held January 20 and 21 at The Washington Court Hotel in Washington DC. The Winter National Meeting will cover such topics as our Party's preparations for the 2004 presidential election cycle, President Bush's State of the Union address and the pressing legislative issues of the day.

MEMBERSHIP INFORMATION

- I wish to attend The President's Club Winter National Meeting where we will view President Bush's State of the Union address to Congress, discuss the upcoming legislative session and our Party's preparations for the 2004 presidential election cycle.
- I cannot attend The President's Club Winter National Meeting, but I know President Bush needs my continued help. To support President Bush and the Republican Congress, I am enclosing a special President's Club 2004 campaign contribution of:

- \$1,000 \$500 \$250 ___ Other

Please make checks payable to: **The President's Club**

WINTER MEETING REGISTRATION

- I will be attending The President's Club Winter Meeting in Washington, D.C. on January 20 and 21. I have enclosed my conference fee of \$225.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

Over, please

If you are attending the Winter National Meeting of The President's Club:

The President's Club has reserved blocks of rooms at The Washington Court Hotel on Capitol Hill, Washington, D.C. Make your reservations as soon as possible by calling The Washington Court Hotel directly at 1-800-321-3010.

Funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

Occupation*: _____ Employer*: _____





Check here if self-employed.* Telephone number: () _____

E-mail address: (Home)[§] _____ (Business) _____

Contributions from corporations and foreign nationals are prohibited.

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310 First Street, S.E. Washington, D.C. 20003
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You may make your contribution to The President's Club by credit card if you choose by completing the information below: (Note: Credit card MUST be personal — not corporate.)

Type of Credit Card:    

Credit Card Number: _____ Expiration Date: _____


Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

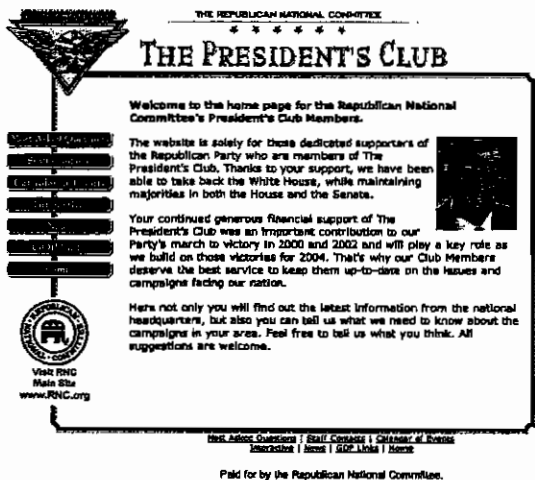
To have an immediate impact you may contribute to The President's Club or R.S.V.P. for the 2004 Winter National Meeting online at www.GOP.com/PCWinterMeeting.

If you're a new visitor, here's how you log-on to The President's Club home page.

To login:

1. Go to web page www.rncfc.org
2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."
3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.
4. Enter your password. If you are a new user, your password is 
5. Click "Log In" and you're in.

All The President's Club and RNC news, and links to other political organizations in one site. Make The President's Club your home page and log on today!



THE REPUBLICAN NATIONAL COMMITTEE

THE PRESIDENT'S CLUB

Welcome to the home page for the Republican National Committee's President's Club Members.

The website is solely for those dedicated supporters of the Republican Party who are members of The President's Club. Thanks to your support, we have been able to take back the White House, while maintaining majorities in both the House and the Senate.

Your continued generous financial support of The President's Club was an important contribution to our Party's march to victory in 2000 and 2002 and will play a key role as we build on those victories for 2004. That's why our Club Members deserve the best service to keep them up-to-date on the issues and campaigns facing our nation.

Here not only you will find out the latest information from the national headquarters, but also you can tell us what we need to know about the campaigns in your area. Feel free to tell us what you think. All suggestions are welcome.

Visit RNC Main Site www.RNC.org

Visit About Us | Staff | Contact Us | Chairman's Message | News | GOP Links | Home

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2003 Spring
National Meeting

MARC RACICOT
CHAIRMAN

March 19, 2003

Mr. & Mrs. Jones Felvey, II

Dear Mr. & Mrs. Felvey:

President's Club members like you played a vital role in our Party's success in 2002.

It was your steadfast dedication and generous support of President Bush and his vision of a better, more secure America that led to the election of a Republican Congress for the 108th session.

That is why it is my pleasure to invite you to join our Party's leadership team at the next level as a member of the Chairman's Advisory Board and attend the 2003 Spring National Meeting in Washington, D.C. on April 29-30...

...And to join us for a reception to welcome the GOP freshman class -- 33 new Representatives in the U.S. House and 9 new members in the U.S. Senate -- at the exclusive Capitol Hill Club.

I hope you will accept your invitation immediately -- not every President's Club member was extended this special honor.

The New Members reception, to be held Wednesday, April 30th, is an exclusive event for Board members only -- and certainly one you will not want to miss.

Mr. & Mrs. Felvey, this is a great opportunity to meet the new leaders of the Republican Party as they work to implement President Bush's compassionate conservative agenda.

And as a member of the Chairman's Advisory Board, all of our Republican officials want to hear from you.

In addition, Chairman's Advisory Board members will have a Board members-only dinner on Tuesday, April 29th with members of the Republican National Committee Leadership.

The Chairman's Advisory Board was formed in 1990 as a senior leadership forum designed to enlist the personal energy and expertise of Republican leaders in business and community affairs.

You have earned your place at the next level of leadership of the Republican Party and I hope you will accept your invitation today.

Membership in the Chairman's Advisory Board requires an annual contribution of \$5,000. But because of the critical role you played in the historic Republican victories of 2002, I am offering you a special membership rate of \$4,000 -- a credit of \$1,000 for your previous donations to The President's Club -- if you join the Chairman's Advisory Board today.

(If you do choose to attend the Spring Meeting, a separate conference fee of \$250 will be charged to cover expenses of the meeting. This amount counts against your federal contribution limits.)

The remainder of our tentative agenda will focus on foreign policy, judicial nominees, grassroots party-building and a discussion on the upcoming budget battle over President Bush's stimulus and tax relief plan.

We have invited senior policy makers, national Republicans experts and Party leaders to take part in this critical Spring National Meeting. I look forward to hearing your thoughts on the important topics of the day.

(Next page, please...)

Mr. & Mrs. Felvey, President Bush is leading our country through challenging times. The President is still actively engaged in aggressively pursuing the war on terrorism, working to cut taxes to grow the economy, improving our health care system and providing for a strong homeland and national defense.

The President now needs the support of every Republican to help move our agenda for a brighter future for every American forward.

This task will not be easy. Our majorities in Congress are extremely slim -- the opposition is determined to stop President Bush's agenda cold.

Led by San Francisco liberal Nancy Pelosi in the U.S. House and Tom Daschle in the U.S. Senate, the Democrats are using obstructionist tactics to thwart action on key items of the President's agenda such as economic stimulus, judicial nominees, protecting Social Security and a enacting a comprehensive energy policy.

We must stand together to help the President and our Congressional leaders as they work to find solutions around the Democrat gridlock and enact America's agenda. With your support, I know we can do it.

That's why I hope you will accept my invitation to join the Chairman's Advisory Board at the special contribution level of \$4,000. Your support is essential to building support for President Bush's compassionate conservative agenda and ensuring it moves forward.

Please read over the enclosed Chairman's Advisory Board brochure. Inside, it outlines the agenda and mission the Republican Party is working for, as well as a list of benefits of membership in the Chairman's Advisory Board.

The most important benefit of membership, however, is knowing you are doing your part to support President Bush, the Republican Congress and the passage of our positive vision for America.

Even if you cannot attend the Spring Meeting of the Chairman's Advisory Board, I urge you to return the enclosed Membership Acceptance form right away with your full membership contribution of \$4,000 or a partial payment of \$2,000 or even \$1,000 to guarantee your place at next level of the Republican Party's leadership today.

Please take a moment to look over the enclosed tentative agenda and make your reservations today. There's no better to time to visit our nation's Capitol than the spring at the height of the Congressional debate.

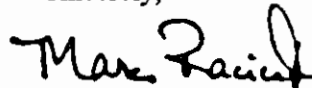
Your membership runs for a full 12 months, so do not worry if you cannot attend the Spring Meeting. You will be invited to the Fall National Meeting and will receive two complimentary tickets to the Republican National Committee's Presidential Gala held in Washington, D.C.

In addition, you will receive weekly political news updates, access to the Chairman's Advisory Board members-only website, and invitations to chat sessions with Party leaders so you can stay up-to-date on the latest news involving the Republican Party.

I hope you won't let this opportunity to become a member of one of the Republican Party's most respected leadership groups pass you by.

On behalf of President Bush and our newly elected Republican members of Congress, thank you again for your generous support. I look forward to seeing you April 29th and 30th.

Sincerely,



Marc Racicot
RNC Chairman

P.S. Please take a moment to review the material I have enclosed. I believe you will be an important member of the Chairman's Advisory Board and I look forward to meeting with you. I hope you will be able to take in all Washington has to offer during the Chairman's Advisory Board Spring National Meeting being held April 29-30 at the Hyatt Regency on Capitol Hill. This will be a great opportunity to interact with top Party leaders and meet the new GOP members of the 108th Congress. Simply return the enclosed Membership Acceptance form along with your full membership contribution of \$4,000. If you have any questions regarding the Chairman's Advisory Board or for more information about the Spring Meeting, please contact the Chairman's Advisory Board office at [REDACTED]. Thank you.



REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD

*2003 Spring
National Meeting*

Mr. & Mrs. Jones Felvey, II
[REDACTED]

P03EC01C
183439817

The 2003 Spring National Meeting of the Chairman's Advisory Board to welcome the new Republican Members of the 108th Congress will be held April 29-30 at the Hyatt Regency on Capitol Hill.

Membership Information

- I wish to upgrade my President's Club membership and become a member of the Chairman's Advisory Board. I am enclosing my full membership contribution of \$4,000.
- I cannot attend the Chairman's Advisory Board Winter National Meeting, but I do wish to become a member of the Chairman's Advisory Board. To help support President Bush, the Republican Congress and Republican candidates at all levels, I am enclosing my Chairman's Advisory Board contribution of:
- \$4,000 (full payment) \$2,000 \$1,000 \$ _____ Other
- I cannot join the Chairman's Advisory Board at this time. I would, however, like to make a special 2003 contribution of:
- \$1,000 \$500 \$250 \$ _____ Other

Spring Meeting Registration

- I will attend the Chairman's Advisory Board Spring National Meeting in Washington, D.C. on April 29-30. I have enclosed my conference fee of \$250.
- I cannot join the Chairman's Advisory Board at this time. I do, however, wish to attend the Spring National Meeting as a member of The President's Club. Please send me all information pertaining to The President's Club agenda for the meeting to be held in Washington, D.C. on April 29-30. I have enclosed my conference fee of \$200.

Please make checks payable to: **Chairman's Advisory Board**

Please make checks payable to The President's Club ONLY if you are not upgrading your membership to the Chairman's Advisory Board.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

If you are attending the Spring National Meeting of the Chairman's Advisory Board:

The Chairman's Advisory Board has reserved blocks of rooms at the Hyatt Regency on Capitol Hill. Please make your reservations as soon as possible at the Hyatt Regency (800) 233-1234. For additional hotel information, please see the back of the enclosed agenda.

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You may make your Chairman's Advisory Board contribution by credit card if you choose by completing the information below: (Note: Credit cards MUST be personal — not corporate.)

Type of Credit Card: VISA MasterCard AMERICAN EXPRESS DISCOVER

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

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Funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

Occupation*: _____ Employer*: _____

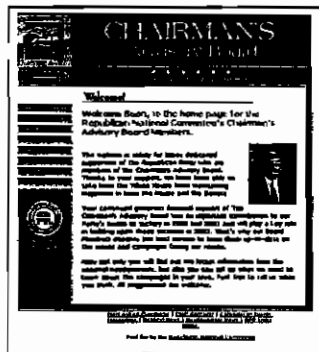
Check here if self-employed.* Telephone number: () _____

E-mail address: (H) _____ (B) _____

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Visit the Chairman's Advisory Board on the Web! www.rncfc.org

To find out the latest happenings and events scheduled for the Chairman's Advisory Board, visit us at www.rncfc.org. Follow the instructions below to log into the exclusive, members only Chairman's Advisory Board homepage.



To login:

1. Go to web page www.rncfc.org
2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."
3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.
4. Enter your password. If you are a new user, your password is [REDACTED]
5. Click "Log In" and you're in.

Get all the Chairman's Advisory Board and RNC news, event information, and political links in one site. Make the Chairman's Advisory Board your home page and log on today!

☆

REPUBLICAN NATIONAL COMMITTEE

Presidential Gala

August 20, 2003

Mr. John H. Livens
[REDACTED]

Dear Mr. Livens:

It is my very great privilege to extend this personal invitation to you to join President Bush, Republican Members of Congress and national Party leaders in Washington, D.C. this October 7th and 8th for two very important events:

- The RNC 2003 Presidential Gala which will kick off our Party's march to the 2004 Republican National Convention in New York where we will nominate the Republican nominee for President of the United States;
- And the Fall National Meeting of the Chairman's Advisory Board.

Mr. Livens, I have taken the liberty of tentatively reserving a Gala and meeting ticket in your name, but I must emphasize that space is limited.

The RNC Presidential Gala is a festive black tie VIP event saluting President Bush and commencing our drive for Republican victory in the 2004 election cycle.

It is also a formal opportunity for our Party's core supporters to thank President Bush for his steady leadership during the challenging times America has faced -- and for returning honor and integrity to the White House.

This is one gathering you won't want to miss and I sincerely hope you are able to attend.

The Presidential Gala is also a very special chance for you to renew your membership in the Chairman's Advisory Board to ensure we are able to provide the resources our Party needs to win in 2004. As you know, the Chairman's Advisory Board has compiled an exemplary record of support for President Bush's agenda and Republican candidates at all levels of government.

As a member of the Chairman's Advisory Board, you are entitled to two complimentary Gala tickets upon renewal of your Chairman's Advisory Board membership for 2003. The annual membership commitment remains \$5,000, payable by check or credit card. Additional tickets may be purchased for \$1,000.

The Fall National Meeting of the Chairman's Advisory Board is being held in conjunction with the Gala, both events will be held at the Hilton Washington. I have enclosed a tentative agenda for your review.

On the evening of October 7 a welcoming reception and dinner featuring former Speaker of the House, Newt Gingrich, will be held. The official meeting schedule begins on the morning of October 8 with detailed briefings from top Republican campaign experts and issue discussions with leading GOP congressional members and policymakers. That evening you'll join supporters from across the country to salute President George W. Bush at our annual Gala.

(Next page, please...)

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET, SOUTHEAST ☆ WASHINGTON, D.C. 20003 ☆ (202) 863-8720 ☆ (800) 762-8564 ☆ FAX: (202) 863-8634 ☆ WWW.RNC.ORG
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CONTRIBUTIONS TO THE RNC ARE NOT TAX DEDUCTIBLE.

RNC000170

Page Two -- Mr. John H. Livens

The Fall National Meeting will be an exciting start to our Party's drive for sweeping Republican victories from the Court house to the White House in '04.

I hope you will take advantage of all the benefits your Chairman's Advisory Board membership offers you by renewing today, including:

- ❖ Two Complimentary tickets to the RNC Presidential Gala
- ❖ VIP credentials for you and a guest to events during the Republican National Convention in New York next summer;
- ❖ Access to the Chairman's Advisory Board members-only website featuring regular online chat sessions and insider briefings to keep you up-to-date on the latest campaign developments;
- ❖ And priority invitations to the Republican Inaugural and related events in January 2005.

But above all, whether your schedule permits you to attend these functions or not, your membership in the Chairman's Advisory Board is an extremely important contribution to Republican victories in 2004.

So I urge you to renew your membership in the Chairman's Advisory Board immediately, and I hope to have the honor of greeting you personally at the Fall National Meeting and Gala on October 7-8.

To reserve your spot at the RNC 2003 Presidential Gala, please send a full Chairman's Advisory Board renewal contribution of \$5,000 along with your RSVP. And because 100% of these funds are strictly reserved for direct candidate support programs, please include a check for the Fall National Meeting conference fee of \$250 to cover meeting-related meals and transportation.

We cannot win this fall and next November without your continued participation. I look forward to hearing from you soon and seeing you in Washington on October 7 and 8. Thank you.

Sincerely,



Ed Gillespie
RNC Chairman

P.S. The 2003 RNC Presidential Gala will honor President Bush's responsible agenda and serve as the kickoff to our drive for victory in 2004. To reserve your seat today, please return your RSVP by September 12 with your contribution of \$5,000 to renew your Chairman's Advisory Board membership for 2003. You may also renew your membership and RSVP for your two complimentary Gala tickets by calling the Chairman's Advisory Board staff at [REDACTED] or e-mail: [REDACTED]. I hope to hear from you soon. Thank you.

RNC000171

REPUBLICAN NATIONAL COMMITTEE

Gala and Fall National Meeting RSVP

Presidential Gala

r. John H. Livens

B03EE07L
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The 2003 Republican National Committee Presidential Gala will be held October 8, 2003 at the Hilton Washington in Washington, D.C. The Gala is being held in conjunction with the Fall National Meeting of the Chairman's Advisory Board on October 7-8.

RNC PRESIDENTIAL GALA:

I wish to renew my Chairman's Advisory Board membership and attend the RNC Presidential Gala to help kick off our drive to the Republican National Convention in New York and victory in the 2004 presidential election cycle. My check for \$5,000 to renew my Chairman's Advisory Board membership for 2003 is enclosed as is an additional check to cover the conference fee of \$250 per individual to attend the Fall National Meeting.

Please note, only fully paid Chairman's Advisory Board Members will be allowed to attend the RNC Presidential Gala.

In addition, I have enclosed an additional payment of _____ to purchase _____ guest ticket(s) @ \$1,000.

CHAIRMAN'S ADVISORY BOARD:

Please indicate the event you will be attending:

October 7, 2003	Member	Guest
Welcome Reception & Dinner	<input type="checkbox"/>	<input type="checkbox"/>
October 8, 2003		
Breakfast Session	<input type="checkbox"/>	<input type="checkbox"/>
RNC Briefing	<input type="checkbox"/>	<input type="checkbox"/>
Discussion Panel	<input type="checkbox"/>	<input type="checkbox"/>
Luncheon	<input type="checkbox"/>	<input type="checkbox"/>
2003 RNC Gala	<input type="checkbox"/>	<input type="checkbox"/>

I cannot attend the RNC Gala or the Chairman's Advisory Board Fall National Meeting, but I want to renew my Chairman's Advisory Board membership for 2003 with a contribution of

\$5,000 \$2,500 \$1,000 \$_____ Other

I must decline your invitation at this time, but I know we must prepare now for the 2004 presidential election cycle. To help support President Bush's agenda, the Republican Congress and GOP candidates at all levels, I am enclosing a special Chairman's Advisory Board contribution of:

\$4,000 \$2,500 \$1,000 \$_____ Other

Please make your personal checks payable to: **Chairman's Advisory Board**
Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

If you are attending the Gala and/or the Fall National Meeting of the Chairman's Advisory Board:

The Chairman's Advisory Board has reserved blocks of rooms at the Hilton Washington in downtown Washington, D.C. Please make your reservations as soon as possible by directly calling the Hilton Washington at 888-DC-HILTON. Please ask for the special Chairman's Advisory Board group rate of \$186 for a room.

RNC PRESIDENTIAL GALA 2003 BLACK TIE

REPUBLICAN NATIONAL COMMITTEE ★ 310 FIRST STREET, SOUTHEAST ★ WASHINGTON, D.C. 20003

Occupation*: _____

Employer*: _____

Please check if self-employed.*

Phone number: _____

E-mail address: (H) _____

(W) _____

Contributions from corporations and foreign nationals are prohibited.

You may make your contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below. (Note: credit card MUST be personal -- not corporate.)

Type of Credit Card:    

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

To have an immediate impact you may contribute to the Chairman's Advisory Board online at _____

If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page.

To login:

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2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."
3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.
4. Enter your password. If you are a new user, your password is _____
5. Click "Log In" and you're in.

All the Chairman's Advisory Board and RNC news, and links to other political organizations in one site. Make the Chairman's Advisory Board your home page and log on today!

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ED GILLESPIE
CHAIRMAN

MARIA CINO
DEPUTY CHAIRMAN



ANN WAGNER
CO-CHAIRMAN

December 29, 2003

Dr. Lester M. Crawford
[REDACTED]

Dear Dr. Crawford:

One of the most important presidential election cycles in history is upon us...

...And it is crucial our Party's most loyal supporters are prepared and informed for what is certain to be a tough, hard fought battle.

Dr. Crawford, that makes your attendance at the Chairman's Advisory Board Winter Meeting vital to our efforts next year.

The Chairman's Advisory Board Winter National Meeting will be held in Washington, D.C. on January 20-21. You should have received a detailed information packet a few weeks ago along with my last letter outlining the agenda for this very special occasion.

To kick off the event, we will gather for an exclusive Chairman's Advisory Board reception to watch the President's third State of the Union address to Congress. There will be several large screen televisions set up so you will not miss one word of the President's speech.

The remainder of our agenda will then focus on our Party's prospects for the 2004 elections. We will have representatives speak about the outlook for the presidential race, as well as members of Congress and other Party leaders to speak to you about congressional and state races around the country, as well as the pressing issues of the day.

To conclude the Winter National Meeting, we will gather Wednesday night at 6p.m. for a Chairman's Advisory Board members' reception and dinner with special guest speaker Ken Mehlman, Campaign Manager, Bush/Cheney 2004.

I hope you will take part in the Winter National Meeting. As Chairman, I know our Party's leaders value hearing the insightful views and opinions of Chairman's Advisory Board members.

(Over, please)

REPUBLICAN NATIONAL COMMITTEE

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RNC000182

Page Two -- Dr. Lester M. Crawford

So please return the RSVP form in the enclosed reply envelope to reserve your place at the 2004 Winter National Meeting. And when you do, please send your contribution of \$5,000 to renew your Chairman's Advisory Board membership or send a partial payment of \$2,500 or \$1,000 to support President Bush and keep our Party's campaign programs on track.

(A separate conference fee of \$225 per person will be charged to cover expenses of the meeting so all of your membership pledge can be dedicated to election programs. This amount will count towards your federal contribution limits.)

President George W. Bush has courageously led our country during challenging times. He has worked with the Republican Congress to strengthen homeland security, cut taxes and improve education.

But our work is far from done. Liberal Democrats will stop at nothing to win and thwart the President's agenda -- America's agenda -- once and for all.

Our Party faces many obstacles to nationwide success. The relentless dedication of Chairman's Advisory Board members like you is crucial to helping elect GOP candidates from the Courthouse to the White House.

Thanks to your generous contributions we are laying the groundwork for victory next year. Your continued financial assistance and spirited participation will bolster our voter registration drives, get-out-the-vote initiatives and valuable campaign services our candidates need to win.

That is why your attendance at the 2004 Winter Meeting of the Chairman's Advisory Board is so important. To register for the event, simply return the enclosed reply card or call the Chairman's Advisory Board staff at [REDACTED]

Attendance at the Winter Meeting requires your membership to be paid in full. Even if you cannot attend the Winter Meeting, I hope you will renew your Chairman's Advisory Board membership today with a contribution of \$5,000 or send a partial payment of \$2,500 or \$1,000 to support President Bush and to keep our Party moving forward.

Again, I truly appreciate your continuing support for our Party as we head into this critically important presidential election year, and I look forward to seeing you in Washington, D.C. on January 20th and 21st.

Sincerely,



Ed Gillespie
Chairman

P.S. If you have not already registered for the Chairman's Advisory Board Winter National Meeting, I hope you will do so today. I don't want you to miss this crucial presidential election year meeting. It will be a great opportunity to interact with congressional leaders and top Party officials. If you have any questions regarding your membership status or to confirm your attendance for the 2004 Winter Meeting, please return the enclosed reply form by January 12th or call the Chairman's Advisory Board staff at [REDACTED]. Thank you.

RNC000183



2004 Winter National Meeting & State of the Union Address

January 20-21, 2004

The Washington Court Hotel
525 New Jersey Avenue, NW • Washington DC 20001

Tuesday, January 20

12:00 p.m.-6:00 p.m. Check-In, RNC Hotel Office Location 7:00 p.m.-10:00 p.m. RNC State of the Union Evening Reception
Location: Atrium Ballroom

Wednesday, January 21

8:00 a.m.-3:00 p.m.	Check-In, RNC Hotel Office Location	12:15 p.m.	<u>Lunch Reception</u> Special Guest Speaker: <i>The Honorable Roy Blunt*</i> House Majority Whip
8:30 a.m.	Meeting Room Pledge of Allegiance, Call to Order Breakfast Speaker: RNC Chairman <i>Ed Gillespie*</i>	1:00 p.m.	<u>Outlook for 2004: Senate, House & the Presidency</u> RNC Deputy Chairman <i>Maria Cino*</i> NRSC Director <i>Jay Timmons</i> NRCC Director <i>Sally Vastola</i> Moderator: RNC Counsel <i>Mike Duncan*</i>
9:30 a.m.-10:20 a.m.	<u>Republican Women: A Congressional Perspective</u> Congresswoman <i>Jennifer Dunn (WA-8)*</i> Congresswoman <i>Ileana Ros-Lehtinen (FL-18)*</i> Congresswoman <i>Nancy Johnson (CT-5)</i> Congresswoman <i>Sue Kelly (NY-19)*</i> Moderator: RNC Counsel <i>Mike Duncan*</i>	Afternoon Free	
10:30 a.m.-11:30 a.m.	<u>Bush Cheney 04- An Election Update</u> <i>Mathew Dowd, Senior Strategist- Bush-Cheney 04</i> <i>Terry Nelson, Political Director- Bush-Cheney 04*</i> Moderator: RNC Counsel <i>Mike Duncan*</i>	6:00-9:30 p.m.	<u>Evening Reception & Dinner -Grand Ballroom</u> Guest Speaker: <i>Ken Mehlman</i> Campaign Manager- <i>Bush-Cheney 04</i>

Dress for meetings is business attire.
* Invited Guest, not confirmed.
All guest speakers are invited pending confirmation.
The agenda is subject to change.

Hotel Information

The Washington Court Hotel has been selected as the host hotel for the Chairman's Advisory Board Winter National Meeting. A special room rate has been negotiated exclusively for Chairman's Advisory Board members. The peak room block is January 20-21, 2004.

The Washington Court Hotel • 525 New Jersey Avenue, NW • Washington, DC 20001
(800) 321-3010 • 202-628-2100 • www.washingtoncourthotel.com

Accommodations: \$185 per night

Please note that room rates do not include applicable sales tax. You are responsible for arranging your own hotel accommodations.

The cut-off date for the Chairman's Advisory Board room block is January 4, 2004.

Accommodations in the Chairman's Advisory Board room block are available on a first-come, first-served basis.

For more information, please contact the Chairman's Advisory Board office at [REDACTED] or

[REDACTED] Or visit our web site at www.GOP.com/CABWinterMeeting.

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RNC000184



CHAIRMAN'S
ADVISORY BOARD

REPUBLICAN NATIONAL COMMITTEE

Chairman's Advisory Board

WINTER NATIONAL MEETING REGISTRATION

Dr. Lester M. Crawford



B04EB09L
115692517

The 2004 Winter National Meeting of the Chairman's Advisory Board will be held January 20 and 21 at The Washington Court Hotel in Washington DC. The Winter National Meeting will cover such topics as our Party's preparations for the 2004 presidential election cycle, President Bush's State of the Union address and the pressing legislative issues of the day.

MEMBERSHIP INFORMATION

- I wish to renew my membership in the Chairman's Advisory Board. My check for \$5,000 is enclosed. I will also attend the Chairman's Advisory Board Winter National Meeting on January 20 and 21.
- I cannot attend the Chairman's Advisory Board Winter National Meeting, but I want to renew my Chairman's Advisory Board membership for 2004. Enclosed is my check for:
 - \$5,000 (*full payment*)
 - \$1,000
 - \$2,500
 - \$ _____ Other

Please make checks payable to: **Chairman's Advisory Board**

WINTER MEETING REGISTRATION

- I will be attending the Chairman's Advisory Board Winter Meeting in Washington, D.C. on January 20 and 21. I am enclosing an additional payment of \$225 per person for the conference fee.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

Over, please

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The Chairman's Advisory Board has reserved blocks of rooms at The Washington Court Hotel on Capitol Hill, Washington, D.C. Make your reservations as soon as possible by calling The Washington Court Hotel directly at 1-800-321-3010.

Funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

Occupation*: _____ Employer*: _____
[] Check here if self-employed.* Telephone number: () _____
E-mail address: (Home) _____ (Business) _____

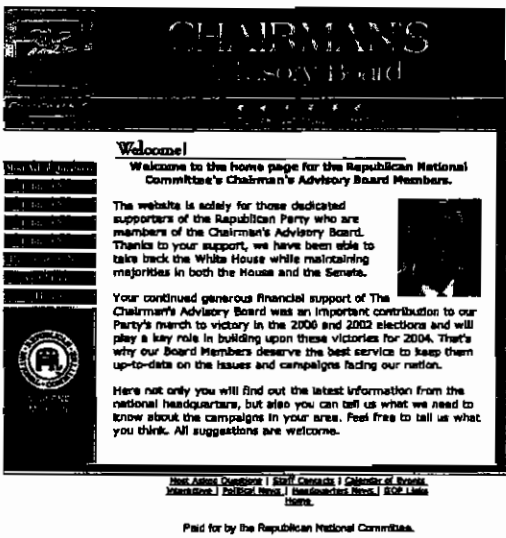
Contributions from corporations and foreign nationals are prohibited.

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You may make your contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below: (Note: Credit card MUST be personal -- not corporate.)

Type of Credit Card: [] VISA [] MasterCard [] AMERICAN EXPRESS [] DISCOVER
Credit Card Number: _____ Expiration Date: _____
Name as it Appears on Card: _____ Amount of Gift: \$ _____
Signature: _____

To have an immediate impact you may contribute to the Chairman's Advisory Board or R.S.V.P. for the 2004 Winter National Meeting online at www.GOP.com/CABWinterMeeting.



If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page.

To login:

- 1. Go to web page www.rncfc.org
2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."
3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.
4. Enter your password. If you are a new user, your password is [REDACTED]
5. Click "Log In" and you're in.

All the Chairman's Advisory Board and RNC news, and links to other political organizations in one site. Make the Chairman's Advisory Board your home page and log on today!



April 2, 2004

Mr. Pedro P. Diaz
[REDACTED]

Dear Mr. Diaz:

I am writing to follow up on the recent invitation I sent asking you to attend The President's Club Spring National Meeting and RNC Presidential Gala on May 4th and 5th in Washington, D.C.

Space is limited and ticket demand is high for this special salute to President Bush. As one of our Party's top supporters, I want to make sure you have reserved your place.

If you have already replied to my invitation, please excuse this letter.

But if you have not yet renewed your President's Club membership for 2004 or made your reservation to attend the Presidential Gala and Spring National Meeting, it is important I receive your reservation by April 19, 2004 to ensure you receive preferred accommodations for these great events.

Mr. Diaz, the dedication and selfless sacrifice of President's Club members like you is the foundation of our Party's success.

Through action and word you help to build support for President Bush's agenda in your community -- and your continuing generous financial support provides the resources Republican candidates at every level of government need to run strong campaigns and win.

The Gala is a celebration of that commitment, and a special opportunity for our Party's senior national leadership to thank you for your support.

In addition, it also commences the final six months of our fight to re-elect a Republican president and Congress in 2004 -- making the Gala a truly memorable experience that is not to be missed.

Only members in good standing of The President's Club are entitled to one complimentary ticket. So please take this opportunity to renew your President's Club membership for the critical 2004 presidential election year with a contribution of \$1,000.

I hope you will be able to participate in the Club's Spring National Meeting as well. In the event you cannot attend, please take this chance to renew your President's Club membership for 2004 to help keep President Bush's agenda and our Party on track.

(Next page, please...)

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RNC000187

Page Two – Mr. Pedro P. Diaz

Mr. Diaz, that is exactly what the 2004 elections are about -- ensuring our country stays the course during these challenging times.

President Bush has put forth a positive vision for the years ahead -- for stimulating economic growth and creating jobs, for strengthening homeland security and winning the war on terror, and building an ownership society.

To achieve these great goals for America we must retain control of the White House and Congress this fall. We must also add to the number of Republican governors and GOP controlled statehouses.

Democrats and their liberal interest allies want no part of this. They are spending hundreds of millions of dollars to run a campaign of protest and pessimism to reclaim total control of the government.

Your membership in The President's Club is an important contribution to countering the Democrats' distortions with the truth. And it's especially crucial to helping fund our voter registration and get-out-the vote programs that will mean the difference between victory and defeat on Election Day.

I know you will enjoy attending the Spring National Meeting and the Presidential Gala -- and with the critical national elections and the future of President Bush's bold and responsible agenda at stake, your participation is more important today than ever.

So if you have not done so already, please return the enclosed reply form to register for the 2004 RNC Presidential Gala and Spring National Meeting of The President's Club along with your full renewal contribution of \$1,000. I have enclosed an updated agenda for our meeting.

(Remember that because 100% of your completed membership contribution is strictly reserved for candidate support activities, a separate conference fee of \$225 will be charged to cover meeting expenses.)

Thank you for everything you do to support President Bush's agenda and our Party. I look forward to seeing you in Washington this May 4th and 5th.

Sincerely,



Ed Gillespie
RNC Chairman

P.S. If you have not already registered for the Spring National Meeting and Presidential Gala, I hope you will do so today. I don't want you to miss this important meeting and tribute to President Bush, so I will hold your one complimentary Gala ticket as long as possible. To claim your Gala ticket and confirm your attendance at the Spring Meeting, please return the enclosed reservation materials today with your contribution of \$1,000 to renew your President's Club membership for 2004 or call The President's Club staff at [REDACTED].

RNC000188



THE PRESIDENT'S CLUB SPRING MEETING RSVP

Presidential Gala and Spring National Meeting Registration

Mr. Pedro P. Diaz

P04ED15L

147926947

The 2004 Republican National Committee Presidential Gala with President George W. Bush will be held May 5, 2004 at the Marriott Wardman Park Hotel in Washington, D.C. *Transportation to the Presidential Gala will be provided.* The Gala is being held in conjunction with the Spring National Meeting of The President's Club on May 4-5 to be held at the JW Marriott on Pennsylvania Avenue.

Membership Information

- I wish to renew my membership in The President's Club. My check for \$1,000 is enclosed.
- In addition, I have enclosed an additional payment of \$ _____ to purchase guest ticket(s) @ \$1,000.
- I cannot attend The President's Club Spring National Meeting or the 2004 Presidential Gala, but I would like to renew my President's Club membership for the 2004 presidential election year. Enclosed is my check for:
 - \$1,000 (full payment)
 - \$250 (partial payment)
 - \$500 (partial payment)
 - Other \$ _____

Please note, only fully paid President's Club Members will be allowed to attend the RNC Presidential Gala.

Gala and Spring National Meeting Registration

(Fully Paid President's Club Members ONLY)

- I will attend the 2004 RNC Presidential Gala and The President's Club Spring National Meeting. I have enclosed my conference fee of \$225.

Special Contribution

- I cannot attend the 2004 RNC Presidential Gala nor can I renew my President's Club membership. But I do want to do my part to support President Bush's compassionate conservative agenda and keep our campaign programs on track, so I am enclosing a special contribution of:
 - \$500
 - \$250
 - \$100
 - Other \$ _____

Please make your personal checks payable to: **The President's Club**

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

If you are attending the Spring National Meeting of The President's Club:

The President's Club has reserved blocks of rooms at the JW Marriott Hotel on Pennsylvania Avenue in Washington, D.C. Please make your reservations directly by calling the JW Marriott at 1-800-228-9290 or 202-393-2000. Please ask for the special RNC group rate of \$249 for a room.

Funds received in response to this solicitation will be subject to federal contribution limits.

Federal Election law requires us to report the following information*:

Occupation*:

Employer*:

Check here if self-employed.* Telephone number: ()

E-mail address: (Home)

(Business)

Contributions from corporations and foreign nationals are prohibited.

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You may make your 2004 campaign contribution to The President's Club by credit card if you choose by completing the information below. (Note: credit card MUST be personal - not corporate.)

Type of Credit Card: VISA MasterCard AMERICAN EXPRESS DISCOVER

Credit Card Number: Expiration Date:

Name as it Appears on Card: Amount of Gift: \$

Signature:

To have an immediate impact you may contribute to
The President's Club online at www.mnfc.org

THE REPUBLICAN NATIONAL COMMITTEE

THE PRESIDENT'S CLUB

Welcome to the home page for the Republican National Committee's President's Club Members.

The website is solely for those dedicated supporters of the Republican Party who are members of The President's Club. Thanks to your support, we have been able to take back the White House, while maintaining majorities in both the House and the Senate.

Your continued generous financial support of The President's Club was an important contribution to our Party's march to victory in 2000 and 2002 and will play a key role as we build on these victories for 2004. That's why our Club Members deserve the best services to keep them up-to-date on the issues and campaigns facing our nation.

Here not only you will find out the latest information from the national headquarters, but also you can tell us what we need to know about the campaigns in your areas. Feel free to tell us what you think. All suggestions are welcome.

Visit RNC Main Site www.RNC.org

Don. Acheson | Dwight D. Eisenhower | Goldwater | Romney | McCain | Obama | McCain | Obama

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If you're a new visitor, here's how you log-on to The President's Club home page.

To login:

1. Go to web page www.mnfc.org
2. Scroll down to the bottom left-hand side of the page to where it says "Please Log In."
3. Enter your user name, which is the same as your nine-digit membership number located on the front of this document.
4. Enter your password. If you are a new user, your password is [REDACTED]
5. Click "Log In" and you're in.

All The President's Club and RNC news, and links to other political organizations in one site. Make The President's Club your home page and log on today!

Hotel Information

If you are attending the gala and/or Spring National Meeting of The President's Club: The President's Club has reserved blocks of rooms at the JW Marriott on Pennsylvania Avenue in Washington D.C. Please make your reservations as soon possible by directly calling the JW Marriott at 800-228-9290 or (202) 393-2000. Please ask for the special RNC group rate of \$249 for a room.

Only fully paid President's Club members will be allowed to attend the Spring National Meeting and Presidential Gala. Please note that room rates do not include applicable sales tax. You are responsible for arranging your own hotel accommodations. Accommodations in The President's Club room block are available on a first-come, first-served basis.

For more information, please contact The President's Club office at [redacted] or [redacted] or visit our web site at www.mncfc.org.

Republican National Committee
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PC@RNCHQ.ORG ★ www.RNCFC.org ★ (800) 762-7764

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REPUBLICAN NATIONAL COMMITTEE

THE PRESIDENT'S CLUB

2004

SPRING NATIONAL MEETING
&
PRESIDENTIAL GALA

MAY 4-5, 2004

AGENDA

J. W. MARRIOTT HOTEL PENNSYLVANIA AVENUE
1331 PENNSYLVANIA AVE.
WASHINGTON, DC 20004



Tuesday, May 4th

12:00 p.m.-6:00 p.m. **Check-In, RNC Hotel Office**
Location
Registration: Treasury Room

6:00 p.m.-9:00 p.m. **Evening Reception and Dinner**
Location: Marriott Salon 3
Guest Speaker: *The Honorable*
Don Evans*
Secretary of Commerce
Intro: *Co-Chairman Ann Wagner**

Wednesday, May 5th

8:00 a.m.-3:00 p.m. **Check-In, RNC Hotel Office**
Location Registration:
Treasury Room

8:15 a.m. **Breakfast**

9:00 a.m. **J. W. Marriott Grand Ballroom**
Call to Order, RNC Counsel
Mike Duncan*
Speaker: *RNC Deputy Chairman*
Maria Cino*

9:30 a.m.-10:20 a.m. **America at Work**
The Honorable Elaine Chao*
Secretary of Labor
Intro by: *Mike Duncan,*
RNC Counsel*

10:30 a.m.-11:30 a.m. **Congressional Review**
Congressman Rob Portman (OH-2)*
Congressman Joe Barton (TX-6)
Moderator: *Mike Duncan,*
RNC Counsel*

12:00 p.m.-1:00 p.m. **Special Guest Speaker**
Senator Don Nickles (R-OK)

1:15 p.m. **Inside the Beltway**
Rich Lowry
Author of Legacy: Paying the Price
for the Clinton Years

Afternoon Free

6:30 p.m. **Republican Presidential Gala**
Honoring President George W. Bush
The Marriott Wardman Park
Grand Ballroom
2660 Woodley Road, NW,
Washington, DC

Thursday, May 6th

8:00 a.m.-10:00 a.m. **Breakfast Reception**
Location: Four Seasons Hotel on
Pennsylvania Avenue
Garden Terrace
Special Guest Speaker: Senator Orrin
G. Hatch*

Dress for meetings is business attire.
Dress for the Presidential Gala is business attire.
Transportation from the JW Marriott to the Marriott Wardman Park
will be provided for the Presidential Gala. Transportation will be
provided for Breakfast Reception on May 6.

**Invited guest speaker*



March 22, 2004

Mr. Victor Barnett
[REDACTED]

Dear Mr. Barnett:

On behalf of the Republican National Committee (RNC) and our Party's entire national leadership, I am delighted to extend this invitation to you to join President Bush and Republican Members of Congress in Washington, D.C. this May 5th at the 2004 RNC Presidential Gala.

Mr. Barnett, the Presidential Gala will commence the final six months of our Party's campaign to re-elect a Republican president and Congress in 2004...

...And to add to the 28 GOP Governors serving the American people and increase our majorities in the nation's state houses.

The Gala is also a chance for our Party to salute President Bush for his steady and principled leadership. Held in conjunction with the Chairman's Advisory Board Spring National Meeting on May 4-5, it will truly be an historic event you will not want to miss.

Due to limited space availability, I have taken the step of reserving a Presidential Gala and meeting ticket for you.

You see, every year the RNC Gala brings together our Party's top activists and leaders from across the country in a celebration of common purpose and shared achievement.

But this year's Gala is not merely a celebration. It is a call to arms -- a summons to a battle our Party and America cannot afford to lose.

In addition, the Gala is also a very special opportunity for you to join the Chairman's Advisory Board, one of the RNC's most exclusive and prestigious leadership groups.

Founded in 1990, the Chairman's Advisory Board has compiled an exemplary record of support for President Bush's agenda and Republican candidates at all levels of government. Since its inception, the Gala has been the Chairman's Advisory Board kickoff event every election year. Your full Chairman's Advisory Board annual dues of \$5,000 for 2004 entitles you to two complimentary Gala tickets.

The Chairman's Advisory Board Spring National Meeting will be held at the JW Marriott Hotel on Pennsylvania Avenue. The Presidential Gala will be held at the Marriott Wardman Park Hotel

RNC000203

Page Two – Mr. Victor Barnett

We have a great program in store for you. On the evening of May 4, a welcome reception and dinner featuring invited guest speaker U.S. House Majority Leader Tom DeLay will be held. The business portion of the meeting begins the next morning, May 5, with issue discussions featuring senior policymakers and GOP congressional members.

We will re-convene later that night for the RNC Presidential Gala to honor President Bush and start the countdown to nationwide Republican victories on Election Day.

The Chairman's Advisory Board Spring National Meeting is designed with one purpose in mind: to give you a chance to meet and get to know our Party's key decision-makers, share your views at a senior leadership level, and trade ideas and insights with our Party's top grassroots activists from across America.

That mission statement defines the Chairman's Advisory Board agenda for the entire year. As a member of the Chairman's Advisory Board, your benefits include:

- **VIP passes for you and a guest to attend events during the Republican National Convention in New York this summer;**
- **Access to confidential insider briefings, regular online chat sessions and the latest campaign news through the Chairman's Advisory Board members-only website;**
- **And priority invitations to the Republican Inaugural and related events in January 2005.**

But above all, the greatest benefit of membership is knowing you have taken a stand -- that you are part of the team working with President Bush and the GOP Congress for a better, safer, more prosperous future for America.

So I urge you to accept this invitation to join the RNC's Chairman's Advisory Board today. As noted before, the Chairman's Advisory Board requires an annual membership contribution of \$5,000. Because 100% of these funds are strictly reserved for candidate support activities, the Chairman's Advisory Board charges a nominal conference fee of \$225 per person to cover meeting-related meals and transportation.

To accept your membership in the Chairman's Advisory Board and RSVP for the Gala, simply return the enclosed response card with your check to the RNC by April 16. There is no better way for you to contribute to Republican victory in 2004. I look forward to welcoming you personally to the Chairman's Advisory Board on May 4-5.

Sincerely,



Ed Gillespie
RNC Chairman



CHAIRMAN'S ADVISORY BOARD SPRING MEETING RSVP

Mr. Victor Barnett
 [REDACTED]

550600649

B04EPC03

The 2004 Republican National Committee Presidential Gala with President George W. Bush will be held May 5, 2004 at the Marriott Wardman Park Hotel in Washington, D.C. The Gala is being held in conjunction with the Spring National Meeting of the Chairman's Advisory Board at the JW Marriott Hotel on May 4-5. *Transportation will be provided for the Presidential Gala.*

RNC PRESIDENTIAL GALA:

- I wish to attend the RNC Presidential Gala on May 5 to kickoff our efforts to keep the White House and Congress in Republican hands. My check for \$5,000 is enclosed to cover my Chairman's Advisory Board membership commitment. I understand this also entitles me to full membership privileges in the Chairman's Advisory Board for this presidential election year.
- In addition, I have enclosed an additional payment of _____ to purchase _____ guest ticket(s) @ \$1,000.

CHAIRMAN'S ADVISORY BOARD

- I will also attend the Chairman's Advisory Board Spring National Meeting on May 4-5. I am enclosing an additional payment of \$225 per person for the conference fee.

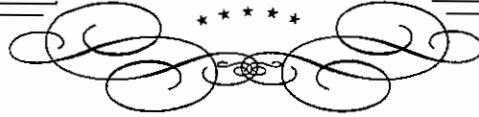
Please note, only fully paid Chairman's Advisory Board Members will be allowed to attend the RNC Presidential Gala and Spring National Meeting.

	Member	Guest
May 4, 2004		
Welcome Reception & Dinner	<input type="checkbox"/>	<input type="checkbox"/>
May 5, 2004		
Breakfast Session	<input type="checkbox"/>	<input type="checkbox"/>
Morning Speaker	<input type="checkbox"/>	<input type="checkbox"/>
Congressional Review Panel	<input type="checkbox"/>	<input type="checkbox"/>
Luncheon	<input type="checkbox"/>	<input type="checkbox"/>
2004 RNC Gala	<input type="checkbox"/>	<input type="checkbox"/>

- I cannot attend the RNC Gala or the Chairman's Advisory Board Spring National Meeting, but I accept your invitation to join the Chairman's Advisory Board for the 2004 presidential election year. Enclosed is my check for:
 - \$5,000 (full payment) \$2,500 \$1,000 \$ _____ Other
- I must decline your invitation at this time, but I know the 2004 presidential elections are important to keeping President Bush's agenda and our country on track. To support our Party's drive to re-elect a Republican president and Congress, and help our GOP candidates running for office at all levels, I am enclosing a special 2004 campaign contribution of:
 - \$500 \$250 \$100 \$ _____ Other

Please make your personal checks payable to: **Chairman's Advisory Board**

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.



REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD

2004 SPRING NATIONAL MEETING
MAY 4-5, 2004

J. W. MARRIOTT HOTEL • 1331 PENNSYLVANIA AVE. • WASHINGTON, DC 20004

Tuesday, May 4th

12:00 p.m.-6:00 p.m.

Check-In, RNC Hotel Office Location
Registration: Treasury Room

6:00 p.m.-9:00 p.m.

Evening Reception and Dinner Location: J. W. Marriott Hotel
Guest Speaker: *The Honorable Thomas D. Delay**
House Majority Leader
Intro: *Co-Chairman Ann Wagner**

Wednesday, May 5th

8:00 a.m.-3:00 p.m.

Check-In, RNC Hotel Office Location
Registration: Treasury Room

8:15 a.m.

Breakfast

9:00 a.m.

J. W. Marriott Grand Ballroom
Call to Order, RNC Counsel Mike Duncan*
Speaker: RNC Deputy Chairman Maria Cino*

9:30 a.m.-10:20 a.m.

America at Work
*The Honorable Elaine Chao**
Secretary of Labor
Intro by: *Mike Duncan, RNC Counsel**

10:30 a.m.-11:30 a.m.

Congressional Review
*Congressman Rob Portman (OH-2)**
*Congressman Joe Barton (TX-6)**
Moderator: *Mike Duncan, RNC Counsel**

12:00 p.m.-1:00 p.m.

Special Guest Speaker
*Senator Don Nickles (R-OK)**

1:15 p.m.

Inside the Beltway
*Rich Lowry**
Author of *Legacy: Paying the Price for the Clinton Years*

Afternoon Free

6:30 p.m.

Republican Presidential Gala
Honoring President George W. Bush
The Marriott Wardman Park Grand Ballroom
2200 Wilson Blvd., Arlington, VA 22201



*Republican National Committee
Chairman's Advisory Board*

*RNC Chairman Ed Gillespie and the entire
Leadership of the National Republican Party
cordially invites*

Mr. Victor Barnett

*to attend the 2004 Spring National Meeting
and RNC Presidential Gala
of the*

Chairman's Advisory Board

*May 4-5, 2004
in Washington, D.C.*

RSVP



or

Return the enclosed RSVP form

Paid for by the Republican National Committee.



ED GILLESPIE
Chairman

ANN WAGNER
Co-Chairman

MARIA CINO
Deputy Chairman

Dear Fellow Republican,

To a great nation, history has given great tasks. And throughout history we've seen Americans unite to meet every challenge. Our nation has triumphed over adversity. We've defended freedom and promoted liberty and democracy around the world.

Now – as we fight international terrorism – our challenge is clear: We must give President George W. Bush the support he urgently needs to do what's right for America by cutting taxes, modernizing Medicare, reforming education, strengthening our energy supply, controlling unnecessary spending and bolstering our national security.

I believe your exemplary record of loyalty and patriotism proves you are the caliber of leader President Bush can count on in this important struggle.

It is therefore my distinct privilege as Chairman of the Republican National Committee (RNC) to present you with your 2004 Republican Party President's Club Platinum Card on behalf of President Bush and every Republican leader nationwide. I hope you will be as proud to carry this exclusive card as I am to have the honor of presenting it to you.

What makes your Platinum Card so prestigious is that only a select few individuals from New York may be nominated for President's Club membership at this time, and therefore only a limited number of Platinum Cards were printed for personalized engraving.

Your Platinum Card, once activated, is your exclusive pass to the exciting events we have planned for The President's Club through this election year – including private receptions during the Republican National Convention (and, if we do our job, President Bush's Inaugural). As a Fully Paid President's Club member, you will also receive one complimentary ticket to this year's Presidential Gala honoring George W. Bush and The President's Club Spring National Meeting. These events are scheduled for May 4-5, 2004. To reserve your place at these prestigious events please call our toll free hotline at [REDACTED] to reserve your spot today.

Attendance at these prestigious events is strictly limited to President's Club Platinum Card holders, so please don't delay in activating your Platinum Card membership.

Because this is an exclusive honor offered only to an elite few selected from each state, I need to know whether or not you will accept your nomination. I ask that you sign the enclosed Membership Acceptance R.S.V.P. and send it back to me in tomorrow's mail.

And with your signed R.S.V.P., I need you to enclose your President's Club contribution

RNC000208

(Next page, please . . .)

Page Two

of \$1,000 to help President Bush and the RNC fight for policies that will strengthen our nation today and for years to come:

- National Security: With our nation at war against terrorism, we must give our military men and women every resource and every weapon they need to win the fight for freedom. And we must protect our American homeland with a missile defense shield.
- Additional Tax Relief: President Bush's tax cuts have launched a record-breaking economic recovery. Making those tax cuts permanent will create more jobs and give every taxpayer stability and security. Permanent tax cuts are the compassionate, common sense approach to rebuilding our economy.
- Social Security: The Democrats' "head in the sand" approach to Social Security's precarious footing is wrong for every American – current retirees, and our children and grandchildren. President Bush is fighting for common-sense reforms that will rescue this program for good, not just provide a costly, temporary band-aid.

As a President's Club Platinum Card member, you will enjoy unique opportunities to meet face-to-face with leading Republican policymakers and discuss these and other pressing issues facing America right now.

At The President's Club national meetings in Washington, D.C., Republican leaders from Congress and Republican governors will speak on the status of policy and campaign battles, and listen to your advice, opinions and questions on strategy decisions.

Republican leaders look forward to these President's Club meetings for the wealth of information we glean from members, and also for the opportunities to make lasting friendships with people of your extraordinary caliber from all across the nation.

Your President's Club contribution of \$1,000 – which you need to send back with your Receipt Confirmation to activate your Platinum Card membership – entitles you to the full range of Presidential Election Year benefits including our private events during the National Convention and – if we do our job – President Bush's Inaugural.

And as a President's Club member, you will provide not only the financial support our Party must have, but also the firsthand insights we need to use those funds in the most effective way possible to elect more Republicans who share your views.

As President Bush leads our nation in this time of great challenge, his political opponents are determined to divide America with petty partisanship. Our country deserves better. That's why your loyalty to President Bush is so very important.

In this election year, partisan politics threaten to overwhelm responsible statesmanship on the President's most critical initiatives. While the campaigns will show Americans the clear

(Next page, please...)


Page Three

choice between Republican leadership and Democrat rhetoric, we can't just assume the voters will agree with us – we must work for their votes, earn their votes, and get them to the polls.

As the RNC works to give President Bush the support he needs in Congress and at the grassroots level to implement the policies you believe are most important, our support comes only from the voluntary gifts of Americans like you.

So please: return your Membership Acceptance R.S.V.P. along with your gift of at least \$1,000 to join The President's Club. President Bush has never needed your leadership more – and never has the value to our nation of your extraordinary patriotism been so evident.

Sincerely,



Ed Gillespie
RNC Chairman

P.S. I believe your exemplary record of loyalty and patriotism proves you are the caliber of leader President Bush can trust to fight with him for America's safety, security and prosperity. That's why you were selected as a President's Club Platinum Card member of the Republican National Committee.

Please, accept this honor with my most sincere thanks, and join The President's Club today with your contribution of \$1,000. To activate your Card, and guarantee your place at our private Club events during the National Convention, please call our toll-free hotline at [REDACTED] [REDACTED] reserve your spot. Thank you!

TO: Ed Gillespie, Chairman

I received my 2004 President's Club Platinum Card. I am proud to be selected for President's Club membership in time to enjoy the exclusive benefits members receive during the Republican National Convention, Election Night and — if we do our job — President Bush's next Inaugural.

I accept my membership, and you can count on me for the commitment and loyalty that earned me this honor as a President's Club Platinum Card Member.

I'm enclosing my 2004 membership contribution of \$1,000 (\$2,000 per couple).

I would like to pay in installments, with the balance due by April 16, 2004.

Enclosed is my first contribution of: \$750 \$500 \$250 Other \$ _____

Please make check payable to The President's Club, or see reverse to contribute via credit card.

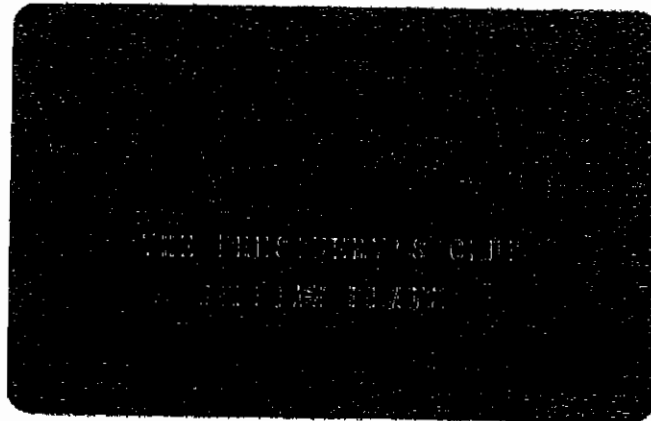
Contributions or gifts to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes. Please see reverse side for important information.

William Blatz

[Redacted signature area]

Confirmation Number: [Redacted]

Please note any changes to your name and address above and fill out the information on the back. Then, please be sure to sign and return this Confirmation with your check or credit card information in the enclosed postage-paid envelope.



Authorized Signature Confirming Platinum Card Receipt _____ Date _____

[Redacted signature area]



April 11, 2005

Mr. James E. Preston
[REDACTED]
[REDACTED]

Dear Mr. Preston,

I recently sent your personal invitation to the 2005 RNC Presidential Gala honoring President George W. Bush. Our annual Gala will be held Tuesday, May 17th at the Grand Hyatt Hotel in Washington, D.C.

Space is limited and ticket demand is high for what is certain to be the preeminent Republican gathering of the year. As one of our Party's top supporters, I want to make sure you have reserved your place.

If you have already replied to my earlier invitation, please excuse this letter.

But if you have not yet made your reservation to attend the Presidential Gala and Chairman's Advisory Board Spring National Meeting, it is important I receive your RSVP by April 29th to ensure your tickets are reserved for these great events.

Mr. Preston, Chairman's Advisory Board members like you were the key to our Party's historic Election Day victories in 2004.

Your generous support helped President Bush become the first Republican President to be re-elected with majorities in the U.S. House and U.S. Senate since 1924.

This year's Presidential Gala will be a celebration of your hard work and dedication, and a special opportunity for President Bush to thank you for your commitment to our Party and our cause.

It also provides you a chance to join fellow members of the Chairman's Advisory Board, Republican Members of Congress and our national Party leaders in this special salute to President Bush's leadership.

Only members in good standing of the Chairman's Advisory Board are entitled to two complimentary Gala tickets. So please take a moment to complete your Chairman's Advisory Board membership with a contribution of \$3,000.

(Next page, please...)

Page Two — Mr. Preston

I look forward to meeting you and hope you will participate in the Board's Spring National Meeting as well. But, even if you cannot attend, please fulfill your Chairman's Advisory Board membership commitment with a contribution of \$3,000 or send a partial payment of \$1,500 or \$750 to support President Bush and help elect more Republican candidates in 2005-2006.

Make no mistake, Mr. Preston, Democrats are still seething from their defeat in 2004. They are already gearing up for the 2006 elections in their attempt to take back total control of Congress.

The liberal leadership of the Democrat Party is relying on their same old obstructionist tactics and spiteful rhetoric instead of working with our President and Republican leaders in Congress to enact positive change for all Americans.

The RNC must be able to get our message of reform past the Democrat bitterness and anger in order to build momentum for the President's agenda.

Your leadership and dedication as a Chairman's Advisory Board member is important to advancing the President's compassionate conservative agenda -- and keeping our Party moving forward.

That's why your attendance and participation at the Chairman's Advisory Board Spring National Meeting and RNC Presidential Gala is so vital. You'll hear from senior policymakers, Party officials and Congressional leaders about the steps we're taking to implement our agenda and our Party's preparations for the 2005 state and 2006 mid-term elections.

So if you have not done so already, please return the enclosed reply form to register for the 2005 RNC Presidential Gala and Spring National Meeting of the Chairman's Advisory Board. I have enclosed an updated agenda of the meeting.

Remember that funds raised through membership contributions are strictly reserved for candidate support activities so a conference fee of \$250 will be charged for the Spring National Meeting to cover expenses.

And when you do, please send a contribution of \$3,000 to complete your Chairman's Advisory Board membership commitment. Again, I truly appreciate your continuing support for our Party, and I look forward to seeing you in Washington, D.C. on May 16th and 17th.

Sincerely,



Ken Mehlman
RNC Chairman

P.S. If you have not already registered for the 2005 RNC Presidential Gala and Spring National Meeting, I hope you will do so today. Both events are extremely important to building momentum for President Bush's agenda and helping prepare for the 2005 state and 2006 mid-term elections. You can RSVP by returning the enclosed reservation materials, calling the Chairman's Advisory Board staff at [REDACTED] or going online at www.rnccab.com. You may also contact the staff office at any time by sending an email to [REDACTED]. Thank you.

RNC000253



Presidential Gala & Spring Meeting Registration

Mr. James E. Preston
 [Redacted Address]

B05EC37A
 113918468

The 2005 Republican National Committee Presidential Gala honoring President George W. Bush will be held May 17, 2005 at the Grand Hyatt Hotel located at 1000 H Street NW, Washington, D.C. 20001. The Gala is being held in conjunction with the Spring National Meeting of the Chairman's Advisory Board on May 16-17.

- I wish to attend the RNC Presidential Gala on May 17. My check for \$3,000 to complete my Chairman's Advisory Board membership commitment for 2005 is enclosed. I understand that my paid in full membership entitles me to two complementary Gala tickets.

Please note, only fully paid Chairman's Advisory Board Members will be allowed to attend the RNC Presidential Gala and Spring National Meeting.

- In addition, I have enclosed an additional payment of _____ to purchase _____ guest ticket(s) @ \$1,000.
- I will also attend the Chairman's Advisory Board's Spring National Meeting on May 16-17. I am enclosing an additional payment of \$250 per person for the conference fee.

Please indicate the events you will be attending:

	Member	Guest
May 16, 2005		
Welcome Reception & Dinner	<input checked="" type="checkbox"/>	<input type="checkbox"/>
May 17, 2005		
Breakfast Session with Chairman Ken Mehlman	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Congressional Panel on Social Security	<input type="checkbox"/>	<input type="checkbox"/>
Congressional Review Panel on the Budget	<input type="checkbox"/>	<input type="checkbox"/>
Luncheon with The Honorable Alphonso Jackson	<input type="checkbox"/>	<input type="checkbox"/>
Afternoon Speaker Ronald Kessler	<input type="checkbox"/>	<input type="checkbox"/>
2005 RNC Gala	<input type="checkbox"/>	<input type="checkbox"/>

- I cannot attend the RNC Gala or the Chairman's Advisory Board's Spring National Meeting, but I know we must prepare now for the 2005-2006 election cycle and keep President Bush's agenda moving forward. To help support President Bush, the GOP Congress and Republican candidates at all levels, I am enclosing a contribution toward my 2005 Chairman's Advisory Board membership at this time. Enclosed please find my check for:

- \$3,000 (full payment) \$1,500 \$750 Other \$ _____

Please make your personal checks payable to: Chairman's Advisory Board

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

If you are attending the Gala and/or the Spring National Meeting of the Chairman's Advisory Board: The Chairman's Advisory Board has reserved blocks of rooms at the Marriott Metro Center Hotel in downtown Washington, D.C. Please make your reservations as soon as possible by directly calling the Marriott Metro Center Hotel at 800-228-9290. Please ask for the special Chairman's Advisory Board group rate for a single or a double.

You may make your 2008 contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below. (Note: the card MUST be personal and corporate.)

VISA
 MasterCard
 AMERICAN EXPRESS
 DISCOVER

Credit Card Number: _____ Expiration Date: _____
 Name as it Appears on Card: _____ Amount of Gift: _____
 Signature: _____

Paid for by the Republican National Committee.
 310 First Street, S.E. Washington, D.C. 20003
 Not authorized by any candidate or candidate committee.

All funds received in response to this solicitation will be subject to federal contribution limits.
 Federal Election law requires us to report the following information*:

Occupation*: _____

Employer*: _____

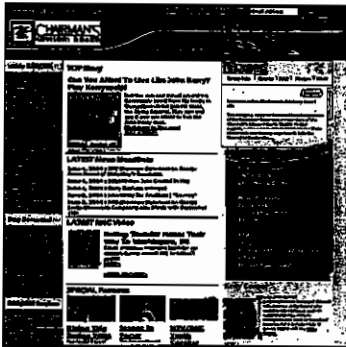
Check here if self-employed.* Telephone number: () _____

E-mail address: (H) _____

(B) _____

Contributions from corporations and foreign nationals are prohibited.

To have an immediate impact you may contribute to the Chairman's Advisory Board online at www.rnccab.com



Visit the Chairman's Advisory Board on the Web!

To find out the latest happenings and events scheduled for the Chairman's Advisory Board, visit us at www.rnccab.com. Follow the instructions below to log into the exclusive, members only Chairman's Advisory Board homepage.

- To login:**
1. Go to web page www.rnccab.com
 2. Enter your user name, which is [REDACTED]
 3. Enter your password. If you are a new user, your password is [REDACTED]
 4. Click "Log In" and you're in.

Get all the Chairman's Advisory Board and RNC news, event information, and political links in one site. Make the Chairman's Advisory Board your home page and log on today!



AGENDA

REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD

2005 Spring National Meeting
May 16 & 17, 2005

Marriott Metro Center
775 12th Street, NW
Washington, DC 20005

Paid for by the Republican National Committee.
310 First Street, SE • Washington, DC 20003
Not authorized by any candidate or candidate committee.



MONDAY, MAY 16TH

11:00 a.m.-6:00 p.m. Check-In, RNC Hotel Office Location
Registration: London II

6:00 p.m.-9:00 p.m. Evening Reception and Dinner
Location: Marriott Grand Ballroom

TUESDAY, MAY 17TH

8:00 a.m.-5:00 p.m. Check-In, RNC Hotel Office Location
Registration: London II

8:15 a.m. Breakfast- Marriott Metro Center
Grand Ballroom

8:45 a.m. PANEL I - RNC & White House
Senior Staff
Ken Mehlman, RNC Chairman
Jo Anne Davidson, RNC Co-Chairman
Lezlee Westine*, Deputy Assistant to the
President and Director of Public Liaison
Claude Allen, Assistant to the President
for Domestic Policy
Mina Nguyen, Director of
Government Affairs, Republican
National Committee
Intro by: Mike Duncan, RNC Counsel

9:30 a.m.-10:20 a.m. PANEL II - Social Security Update
Congressman Sam Johnson (TX)*
Congressman JD Hayworth (AZ)*
Congressman Kenny Hulshof (MO)*
Congressman Paul Ryan (WI)*

10:30 a.m.-11:30 a.m. PANEL III - The Budget
Senator Judd Gregg (NH)*, Senate
Budget Committee Chairman
Congressman Jim Nussle (IA)*, House
Budget Committee Chairman

12:00 p.m.-1:00 p.m. Luncheon Address

1:15 p.m. Author
Ronald Kessler, A Matter of Character:
Inside the White House of
George W. Bush
Book signing following remarks

Afternoon Free

6:00 p.m. Republican Presidential Gala
Honoring President George W. Bush
The Grand Hyatt
1000 H Street, NW
Washington, DC 20001

* Invited Guest, not confirmed.
Dress for meetings is business attire. Dress
for the Presidential Gala is business attire.



August 15, 2005

[REDACTED]

Dear Mr. [REDACTED],

I am writing to follow up the recent invitation I sent asking you to attend the 2005 Chairman's Advisory Board Fall National Meeting on September 13th and 14th in Washington, D.C.

If you have already replied to my earlier invitation, please excuse this letter. But if you have not yet made your reservation to attend, I urge you to do so today. Space is limited for this important gathering of Republican grassroots leaders from across America.

The theme of this year's Fall Meeting, "Maintaining Our Majorities," says it all. With 33 U.S. Senate seats, U.S. House Members in every state, 38 gubernatorial races and numerous state legislatures up for election in 2005-2006, your continued generous support of the Chairman's Advisory Board and your presence at the Fall Meeting are vital.

We have a great group of speakers lined up for you. This will be an event you won't want to miss, Mr. [REDACTED]

We will open our gathering on the evening of September 13th by holding an exclusive reception and dinner with Lynne Cheney, wife of Vice President Dick Cheney. This will be the first time Mrs. Cheney has addressed the Chairman's Advisory Board, so I hope you will not miss this opportunity.

The formal meeting schedule begins the next morning with opportunities to hear from top national Party and Congressional leaders, including Senate Majority Leader Bill Frist. Topics will include the future of the Bush-Republican agenda, tax reform and a '06 election update. In addition, we've also invited Michael Deaver to talk about his book "Why I'm a Reagan Republican" and will conclude our session with a book-signing.

I hope you will attend the Fall National Meeting of the Chairman's Advisory Board as we gear up for the 2005 state elections this fall and the 2006 mid-term elections.

(Next page, please...)

Page Two -- Mr. Bob W. Garthwait, Jr.

If you cannot attend the Fall National Meeting, please take this opportunity to complete your Chairman's Advisory Board membership with a contribution of \$4,000 or send a partial payment of \$2,000, \$1,000 or whatever you can afford to assist President Bush and keep our candidate support programs on track.

Mr. Garthwait, President Bush is working hard to implement his responsible, positive second term agenda -- an agenda that was endorsed by a majority of the American people in 2004.

To ensure that we can make the first term tax cuts permanent, continue to strengthen homeland security, improve education and save Social Security, we must maintain our majorities in the U.S. House and U.S. Senate. We must also add to the number of Republican governors and GOP controlled state legislatures.

But winning will not be easy. Liberal Democrats are blocking the President's agenda in a cynical attempt to recapture total control of Congress in 2006.

Aided by their left-wing allies, Democrats will spend millions of dollars attacking our candidates and smearing our compassionate conservative message. They plan on unleashing the same vicious, pessimistic rhetoric they used in their failed attempt to defeat the President in the 2004 elections.

Your continued support of the Chairman's Advisory Board is crucial to countering the Democrats' distortions with facts. And it's especially crucial to help fund our voter registration and party-building programs, which are vital to Republican victories.

I am confident that with the help of our Party's top leaders -- Chairman's Advisory Board members like you -- our party will have the upfront resources we need to run strong campaigns and win.

So if you have not done so already, please return the enclosed reply form to register for the Chairman's Advisory Board Fall National Meeting. Or to register by phone, call Chairman's Advisory Board staff at [REDACTED]. An updated agenda of the meeting is enclosed for your reference.

Remember that because 100 percent of your membership contribution is strictly reserved for candidate support activities, a separate conference fee of \$250 will be charged to cover meeting expenses.

And please send a contribution of \$4,000 to complete your Chairman's Advisory Board membership along with your registration form to help keep our agenda and Party moving forward. Thank you again for everything you have done and continue to do for our President, Party and country. I hope you can join your fellow grassroots leaders in Washington this September 13th and 14th.

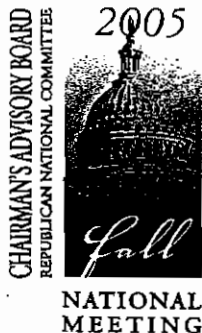
Sincerely,



Ken Mehlman
Chairman, Republican National Committee

P.S. If you have not already registered for the Chairman's Advisory Board Fall National Meeting, I hope you will do so today. I don't want you to miss this important gathering of Party leaders from across the country and the opportunity to hear from Lynne Cheney. If you have any questions regarding your Chairman's Advisory Board membership or to confirm your attendance for the Fall Meeting, please return the enclosed registration form as soon as possible or call [REDACTED]. Thank you

RNC000266



REPUBLICAN NATIONAL COMMITTEE
Chairman's Advisory Board
 FALL NATIONAL MEETING RSVP

Mr. Bob W. Garthwait, Jr.
 [REDACTED]

B05EF03A
 131784737

The 2005 Fall National Meeting of the Chairman's Advisory Board will be held September 13-14 at the Grand Hyatt Hotel in Washington D.C. The theme of the Fall Meeting is "Maintaining Our Majorities" and will cover such topics as President Bush's agenda, our efforts to expand our majorities and our grassroots party-building activities.

Fall Meeting and Membership Information

- I wish to complete my Chairman's Advisory Board membership commitment for 2005 with a contribution of \$4,000. My conference fee of \$250 is also enclosed. I understand that my membership must be fully paid to attend the Fall National Meeting.

Membership Dues (\$4,000) + Individual Conference Fee (\$250)= _____ Amount Enclosed

- I cannot attend the Chairman's Advisory Board Fall National Meeting. I would, therefore, like to make an additional contribution toward my 2005 Chairman's Advisory Board membership at this time. Enclosed is my check for:

- \$4,000 (remaining balance/full payment)
- \$2,000 (partial payment)
- \$1,000 (partial payment)
- \$_____ Other

Please make checks payable to: **Chairman's Advisory Board**

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

If you are attending the Fall National Meeting of the Chairman's Advisory Board:

The Chairman's Advisory Board has reserved blocks of rooms at The Grand Hyatt Hotel in Washington, D.C. Please make your reservations as soon as possible by calling 1-800-233-1234 and asking for the Republican National Committee room block.

*Paid for by the Republican National Committee.
 Not authorized by any candidate or candidate committee.*

You may make your 2005 contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below. (Note: credit card MUST be personal — not corporate.)

Type of Credit Card: VISA MasterCard AMERICAN EXPRESS DISCOVER

Credit Card Number: _____

Expiration Date: _____

Name as it Appears on Card: _____

Amount of Gift: \$ _____

Signature: _____

Paid for by the Republican National Committee.
 310 First Street, S.E. Washington, D.C. 20003
 Not authorized by any candidate or candidate committee.

All funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

Occupation*: _____

Employer*: _____

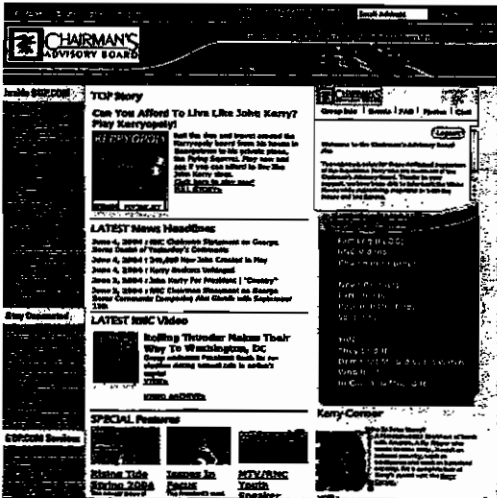
Check here if self-employed.* Telephone number: () _____

E-mail address: (H) _____

(W) _____

Contributions from corporations and foreign nationals are prohibited.

To have an immediate impact you may contribute to the Chairman's Advisory Board online at www.GOP.com



If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page:

Click on the "GOP Donor Groups" icon on the right side of the main webpage. Select the Chairman's Advisory Board link. You will be asked to enter an email address and password. As a first time user your temporary email address will be [redacted] and your temporary password will be [redacted]. Once you enter this information you will be prompted to create your online profile with the Chairman's Advisory Board. Your password will be emailed to you. After logging on for the first time you have the option of personalizing your password by going to the Action Center. Please keep your password for future reference.

If you are a return user and cannot remember your password when prompted, please click "Personal ID Lookup" and your password will be emailed to you.

All the Chairman's Advisory Board and RNC news, and links to other political organizations are on one site. Make the Chairman's Advisory Board your home page and log on today!



Agenda

REPUBLICAN NATIONAL COMMITTEE

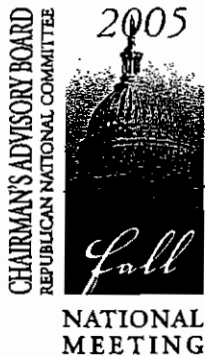
CHAIRMAN'S ADVISORY BOARD

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2005 Fall National Meeting
– Proposed Speakers
September 13 - 14, 2005

The Grand Hyatt
1000 H Street
Washington, D.C. 20001

Paid for by the Republican National Committee.
310 First Street, SE • Washington, DC 20003
Not Authorized by any candidate or candidate committee.



★ ★ ★ ★ ★

TUESDAY, SEPTEMBER 13TH

- 11:00 a.m.-6:00 p.m. Check-In, Grand Hyatt Hotel Office, Bulfinch Room, Constitution Level 3B
- 6:00 p.m.-9:00 p.m. Evening Reception and Dinner
Special Guest: Mrs. Lynne Cheney

WEDNESDAY, SEPTEMBER 14TH

- 8:00 a.m.-5:00 p.m. Check-In, Grand Hyatt Hotel Office, Bulfinch Room, Constitution Level 3B
- 8:15 a.m. Breakfast
- 8:30 a.m. Breakfast Address
Jo Ann Davidson, RNC Co-Chair
- 9:15 a.m. Panel I: '06 Election Update
Kelley McCullough – RNC Chief of Staff*
Michael Pieper – RGA Executive Director
Mark Stephens – NRSC Executive Director
Sally Vastola – NRCC Executive Director*
Sara Taylor – White House Political Director*

- 10:50 a.m. Panel II: Congressional Update on Taxes
Congressman Bobby Jindal (1st LA)*
Congressman Patrick McHenry (10th NC)
Congressman Jim Nussle (1st IA)*
Congressman Adam Putnam (12th FL)*

11:45 a.m.-12:30 p.m. Afternoon Break

12:30 p.m. Luncheon Address
Senate Majority Leader Bill Frist (TN)*

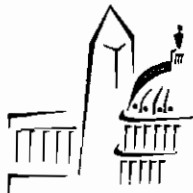
1:40 p.m. Author
Michael Deaver*

*Invited, not confirmed.
Dress for the all meetings
is business attire



★ ★ ★

The Chairman's Advisory Board has reserved rooms at the Grand Hyatt Hotel in Washington, D.C. Please make your reservations as soon as possible by calling 800-233-1234 and asking for the Republican National Committee block.



KEN MEHLMAN
CHAIRMAN

JO ANN DAVIDSON
CO-CHAIRMAN

2006 *Winter*
National Meeting

CHAIRMAN'S ADVISORY BOARD

December 16, 2005

Mrs. W. A. Verlander



Dear Mrs. Verlander,

As a member of the Republican National Committee's Chairman's Advisory Board, you are an integral part of our Party's team and will play an important role as we work to maintain our Republican majorities in 2006.

Your continued commitment is vital as we spread our positive message to voters and lay the groundwork to elect Republicans up and down the ticket.

That's why it is my pleasure to invite you to attend the Winter National Meeting of the Chairman's Advisory Board on January 30-31, 2006 at the Washington Court Hotel in Washington, D.C. I hope you can participate in what is sure to be an important and informative meeting.

Mrs. Verlander, we have less than a year to build momentum for the 2006 mid-term elections. If we are successful next fall, it will be the first time since 1931 that the Republican Party has controlled the White House and both chambers of Congress for eight consecutive years.

We have an exciting meeting planned for you. To kick off our event, I will host a reception and dinner on Monday evening, January 30, to bring you up to date on the issues of the day and our continuing efforts to build our Party from the grassroots up.

(Over, please...)

REPUBLICAN NATIONAL COMMITTEE
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OR CANDIDATE COMMITTEE. CONTRIBUTIONS TO THE RNC ARE NOT TAX DEDUCTIBLE.

Page Two -- Mrs. W. A. Verlander

The remainder of our agenda will focus on our preparations for the 2006 mid-term elections and the challenges facing President Bush and Republican leaders in Congress as they work to fully enact our responsible agenda.

We have invited Senator Orrin Hatch (UT) and New York Governor George Pataki to discuss their perspectives with you, and a Congressional panel featuring Deputy Majority Whip Eric Cantor (VA), Vice Chairman of the Republican House Conference Jack Kingston (GA), Chairman of the Committee on Rules David Dreier (CA) and House Appropriations Committee Member Kay Granger (TX) to discuss tax reform.

Our meeting will also feature RNC Political Director Mike Duhaime and RNC Senior Adviser and Bush-Cheney 2004 pollster Matthew Dowd, who will present the nuts and bolts of the upcoming campaigns.

Our program will conclude on Tuesday, January 31, with a dinner featuring Newt Gingrich who will discuss President Bush's upcoming agenda for the 2006 mid-term election year.

As a member of the Chairman's Advisory Board, your input and ideas are sought by all of our Republican officials. I look forward to hearing your insights, so I hope you will participate in the Winter Meeting.

Please return the RSVP form in the enclosed reply envelope to reserve your place today. And when you do, please include a contribution of \$1,410 to complete your Chairman's Advisory Board membership or send a partial payment of \$705 or \$355 to support President Bush and help keep our 2006 campaign support programs on track.

Because 100 percent of your membership contribution is strictly reserved for candidate support activities, a separate conference fee of \$250 will be charged to cover expenses. This amount counts against your federal contribution limit.

The RNC and our Republican candidates are counting on the support of grassroots leaders like you to maintain our majorities in the upcoming 2006 mid-term elections.

Democrats only need to pick up fifteen seats in the U.S. House and only six seats in the U.S. Senate to reclaim total control of Congress.

With a majority in Congress, liberal Democrats will reverse everything President Bush has accomplished -- and put a stop to the positive agenda the President and the GOP Congress are working to achieve.

(Next page, please...)

Page Three -- Mrs. W. A. Verlander

We must keep our grassroots network strong and build for the future.
With your continued help, the RNC will lay the foundation for the crucial 2006 mid-term elections by expanding our communications program, keeping our voter registration efforts going full steam and providing direct financial assistance to our candidates.

Our task is not easy. We face a Democrat Party that is infused with liberal special interest money geared towards misleading voters and defeating our Republican candidates at all levels. The Democrats will do whatever it takes to stop the President's agenda cold.

That's why your participation at the Winter Meeting of the Chairman's Advisory Board is so important.

Please take a moment right now to make your reservations. To register for the Chairman's Advisory Board Winter Meeting, January 30-31, simply return the enclosed reply card or call Chairman's Advisory Board staff at [REDACTED].

Even if you cannot attend the Winter Meeting, I hope you will complete your Chairman's Advisory Board membership commitment with a contribution of \$1,410 or send a partial payment of \$705 or \$355 to support President Bush's agenda and help keep our Party moving forward to victory in 2006.

On behalf of President Bush, Republican Members of Congress and our candidates at all levels, thank you again for your generous support. I look forward to seeing you in Washington, D.C. on January 30.

Sincerely,



Ken Mehlman
Chairman
Republican National Committee

P.S. The Chairman's Advisory Board Winter National Meeting will be held in Washington, D.C., January 30-31, at the Washington Court Hotel. This will be a great opportunity to interact with top Party officials and Congressional leaders as we finalize our preparations for the important 2006 mid-term elections. If you have any questions regarding your Chairman's Advisory Board membership or if you would like to confirm your attendance for the Winter Meeting, please return the enclosed reply form as soon as possible or call the Chairman's Advisory Board staff at [REDACTED]. Thank you.

P.P.S. The Chairman's Advisory Board has reserved a block of rooms at the Washington Court Hotel. Call to make your hotel reservations for January 30-31 at 1-800-321-3010.



2006 Winter
National Meeting

CHAIRMAN'S ADVISORY BOARD

2006 Winter National Meeting Registration

REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD
WINTER NATIONAL MEETING REGISTRATION/RSVP

Mrs. W. A. Verlander
[REDACTED]

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The 2006 Winter National Meeting of the Chairman's Advisory Board will be held January 30-31 at The Washington Court Hotel in Washington D.C. This year's Winter Meeting will cover topics such as President Bush's second term agenda, our efforts to expand our majorities in the 2006 mid-term elections, and strengthening our Party from the grassroots up.

Winter Meeting Registration and Membership Information

- I wish to complete my Chairman's Advisory Board membership commitment with a contribution of \$1,410. My conference fee of \$250 per person is also enclosed. I understand that my membership must be fully paid to attend the Winter National Meeting.

Membership Dues (\$1,410) + Individual Conference Fee (\$250) = _____ Amount Enclosed

- I cannot attend the Chairman's Advisory Board Winter National Meeting. I would, however, like to make an additional contribution toward my Chairman's Advisory Board membership at this time. Enclosed is my check for:

- \$1,410 (remaining balance/full payment)
- \$705 (partial payment)
- \$355 (partial payment)
- \$ _____ Other





Please make checks payable to Chairman's Advisory Board

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

If you are attending the Winter National Meeting of the Chairman's Advisory Board:

The Chairman's Advisory Board has reserved rooms at The Washington Court Hotel, 525 New Jersey Court NW, Washington, D.C. 20001. Please make your reservations as soon as possible by calling 1-800-321-3010 and asking for the Republican National Committee block.

You may make your Chairman's Advisory Board contribution by credit card if you choose by completing the information below: (Note: Credit cards MUST be personal — not corporate.)

Type of Credit Card:    

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

Paid for by the Republican National Committee.
 310 First Street, S.E. Washington, D.C. 20003
 Not authorized by any candidate or candidate committee.

All funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

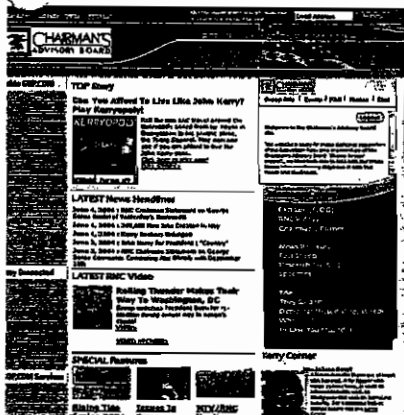
Occupation*: _____ Employer*: _____

Check here if self-employed.* _____ Telephone number: () _____

E-mail address: (H) _____ (B) _____

Contributions from corporations and foreign nationals are prohibited.

To have an immediate impact you may contribute to the Chairman's Advisory Board online at www.GOP.com



If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page:

Click on the "GOP Donor Groups" icon on the right side of the main webpage. Select the Chairman's Advisory Board link. You will be asked to enter an email address and password. As a first time user your temporary email address will be [redacted] and your temporary password will be [redacted]. Once you enter this information you will be prompted to create your online profile with the Chairman's Advisory Board. Your password will be emailed to you. After logging on for the first time you have the option of personalizing your password by going to the Action Center. Please keep your password for future reference.

If you are a return user and cannot remember your password when prompted, please click "Personal ID Lookup" and your password will be emailed to you.

All the Chairman's Advisory Board and RNC news, and links to other political organizations are on one site. Make the Chairman's Advisory Board your home page and log on today!

Hotel Accommodations

The Washington Court Hotel has been selected as the host hotel for the Chairman's Advisory Board Winter National Meeting. A special room rate has been negotiated exclusively for Chairman's Advisory Board members. The peak room block is January 30-31, 2006.

Washington Court Hotel
525 New Jersey Avenue, NW
Washington, DC 20001
(800) 321-3010
<http://www.washingtoncourthotel.com/>

Single Accommodations: \$249 per night
Double Accommodations: \$274 per night

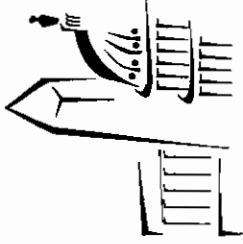
Please note that room rates do not include applicable sales tax. You are responsible for arranging your own hotel accommodations.

Accommodations in the Chairman's Advisory Board room block are available on a first-come, first-served basis.

For more information, please contact the Chairman's Advisory Board office at [REDACTED]. Or visit our web site at www.GOP.com.

Only fully paid Chairman's Advisory Board members will be allowed to attend the Winter National Meeting.

REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD



2006 Winter
National Meeting

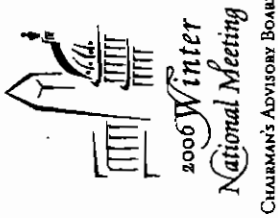
CHAIRMAN'S ADVISORY BOARD

Agenda

January 30 & 31, 2006

THE WASHINGTON COURT HOTEL
(Located near the U.S. Capitol on the Senate side.)

525 NEW JERSEY AVE. NW
WASHINGTON, DC 20001
1-800-321-3010



Monday January 30, 2006

- 11:00 a.m. - 5:30 p.m. Registration
Location: The Washington Court Hotel
- 6:00 p.m. - 7:30 p.m. Reception and Photo Opportunity with Republican National Committee Chairman, Ken Mehlman
Location: The Capitol Hill Club, Washington D.C.'s Private Republican Club (Transportation provided.)
- 7:30 p.m. - 9:00 p.m. Dinner
Location: The Capitol Hill Club
Speaker: Chairman Ken Mehlman

Tuesday January 31, 2006

(All events on Tuesday will take place at The Washington Court Hotel.)

- 8:00 a.m. - 5:00 p.m. Registration
- 8:15 a.m. Breakfast
Speaker: Senator Orrin Hatch (UT)*

- 9:15 a.m. - 10:15 a.m. Polling Update
Speaker: Matthew Dowd, RNC Senior Advisor*
- 10:15 a.m. - 10:30 a.m. Morning Break
- 10:30 a.m. - 11:30 a.m. Congressional Update Panel
Congressman Jack Kingston (GA)*
Congressman David Dreier (CA)*
Congressman Eric Cantor (VA)*
Congresswoman Kay Granger (TX)*
- 11:30 a.m. - 12:00 p.m. Break
- 12:00 p.m. - 1:15 p.m. Luncheon Speaker
Governor George Pataki (NY)*
- 1:15 p.m. - 1:30 p.m. Break
- 1:30 p.m. - 3:00 p.m. Afternoon Session: 2006 Election Update
Mike DuHaine, RNC Political Director
Dave Sackett, The Tarrance Group*
Scott Howell, Scott Howell & Company*
- Afternoon Free
- 6:30 p.m. - 7:15 p.m. Reception
- 7:30 p.m. - 9:00 p.m. Dinner
Speaker: Newt Gingrich, Former Speaker of the U.S. House of Representatives*

Dress for all events is business attire.
*Indicates invited speaker, not confirmed.



REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD

President George W. Bush, RNC Chairman Ken Mehlman
and the entire Leadership of the National Republican Party
cordially invites

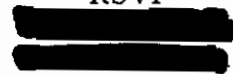
Mrs. W. A. Verlander

To attend the Winter National Meeting
of the
CHAIRMAN'S ADVISORY BOARD

January 30-31, 2006

The Washington Court Hotel
525 New Jersey Ave. NW
Washington, D.C. 20001

RSVP



or

Return the enclosed RSVP form

310 FIRST STREET, S.E. • WASHINGTON, D.C. 20003



KEN MEHLMAN
Chairman

JO ANN DAVIDSON
Co-Chairman

Dear Mr. Adler,

To a great nation, history has given great tasks. And throughout history we've seen Americans unite to meet every challenge. Our nation has triumphed over adversity. We've defended freedom and promoted liberty and democracy around the world.

Now – in this hard-fought election year that will determine the course of our nation – our challenge is clear. We must give President George W. Bush the support he needs to do what's right for America.

Mr. Adler, I believe your exemplary record of loyalty and patriotism proves you are the caliber of leader President Bush can count on in this important struggle.

It is therefore my distinct privilege as Chairman of the Republican National Committee (RNC) to present you with your 2006 Republican Party President's Club Platinum Card on behalf of President Bush and every Republican leader nationwide. I hope you will be as proud to carry this exclusive card, as I am to have the honor of presenting it to you.

What makes your Platinum Card so prestigious is that only a select few individuals from New York will be nominated for President's Club membership at this time, and therefore only a limited number of Platinum Cards were printed for personalized embossing.

Your Platinum Card, once activated, is your exclusive pass to the exciting events we have planned for The President's Club – including this year's Presidential Gala and the President's Club Spring National Meeting scheduled for May. Attendance at these prestigious events is strictly limited to President's Club members, so I hope you won't delay in activating your Platinum Card membership.

In fact, because this is an exclusive honor offered only to an elite few selected from each state, I need to know right away whether or not you will accept your nomination. I ask that you sign the enclosed Membership Acceptance R.S.V.P. and send it back to me in tomorrow's mail.

And with your signed R.S.V.P, I need you to enclose your President's Club contribution of \$1,000 to help President Bush and the RNC fight for policies that will strengthen our nation

(next page, please...)

RNC000282

Page Two

today and for years to come:

- **Tax Relief:** The tax cuts President Bush signed into law in 2001 and 2003 are generating incredible economic growth. President Bush's tax cuts have helped create more than 4.5 million jobs since 2003. Our Bush/Republican tax cuts helped shrink the federal deficit by \$108 billion in 2005. President Bush needs our support to make these tax cuts permanent – so they can continue to boost America's economy, create more jobs and give you more control of your own money.
- **Social Security:** Doing nothing to fix our Social Security system will cost us, as well as our children and grandchildren, an estimated \$10 trillion, according to the Social Security Trustees. President Bush is committed to ensuring that the promise of Social Security is kept for current seniors and those nearing retirement – and that we modernize the system for future generations.
- **National Security:** Defending our nation against its enemies is the first and most fundamental commitment of the Commander-in-Chief. President Bush has set in motion an aggressive campaign to strengthen our military, weed out terrorists, secure our homeland and make the world a more safe, more peaceful place.

As a President's Club Platinum Card member, you will enjoy unique opportunities to meet face-to-face with leading Republican policymakers and discuss these and other pressing issues.

At The President's Club national meetings held in Washington, D.C., Republican leaders will speak on the status of policy and campaign battles, and listen to your advice, opinions and questions on strategy decisions.

Republican leaders look forward to these President's Club meetings for the wealth of information we glean from members, and also for the opportunities to make lasting friendships with people of your extraordinary caliber from all across the nation.

Your President's Club contribution of \$1,000 – which you need to send back with your Membership Acceptance R.S.V.P. to activate your Platinum Card – entitles you to the full range of President's Club benefits – including an invitation to the RNC's Presidential Gala in the spring with our special guest, President Bush.

And as a President's Club member, you will provide more than just financial support for our Party. You will also give us the firsthand insights we need to use those funds in the most effective way possible to help President Bush overcome the angry attacks he's facing right now and strengthen America with sound policies that reflect your values.

**As President Bush leads our nation in this time of great challenge,
his political opponents are determined to divide America with**

(next page, please...)

Chairman's Advisory Board

Ken Mehlman
Chairman

Jo Ann Davidson
Vice-Chairman

Dwight Schar
Finance Chairman



Annual Presidential Gala

April 17, 2006

Mrs. Toni Wheeler

Dear Mrs. Wheeler,

I recently sent you a special invitation to join President Bush at the 2006 RNC Presidential Gala in Washington, D.C. and to attend the Chairman's Advisory Board Spring National Meeting on May 16th and 17th.

Space is limited inside historic Constitution Hall and tickets to this exciting two-day gathering are going fast. As one of our Party's top supporters, I want to make sure you have reserved your place.

If you have already replied to my earlier invitation, please excuse this letter.

But if you have not yet made your reservation to attend the RNC Presidential Gala and Spring National Meeting of the Chairman's Advisory Board, it is important I receive your R.S.V.P. by May 3rd, 2006 to ensure you receive preferred accommodations for these great events.

Mrs. Wheeler, your continuing dedication and generous support of the Chairman's Advisory Board is critical to our Party's and our candidates' success this election year.

The Presidential Gala is the kick off of the final six months of our Race to Victory in 2006. Our goal is to re-elect and strengthen Republican majorities in the U.S. Congress, governorships and the state legislatures.

In addition, the Gala is a special opportunity for President Bush and our Party's senior national leadership to thank you for your commitment to our cause - making it a celebration that you won't want to miss.

Only members in good standing of the Chairman's Advisory Board are entitled to two complimentary tickets. So please take this opportunity to renew your Chairman's Advisory Board membership for 2006 with a contribution of \$5,000.

I hope you will be able to attend both the Gala and the Board's Spring National Meeting. In the event you cannot join us, I hope you will renew your

(Next page, please)

REPUBLICAN NATIONAL COMMITTEE

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RNC000301

Chairman's Advisory Board membership pledge with a 2006 campaign contribution of \$5,000 or send a partial payment of \$2,500 or \$1,000 to help fully fund vital RNC campaign support programs that our candidates need to win.

The Chairman's Advisory Board Spring National Meeting alone makes your trip to our Nation's Capitol a worthwhile experience.

We have a great schedule of speakers and panels lined up for you featuring Republican Members of Congress, Governors, senior policymakers and conservative commentators. I have enclosed an updated agenda for your review.

The Spring National Meeting affords you the chance to share your expertise and ideas with our Party's top leaders and other grassroots activists from across the country.

If you have not already done so, please return the enclosed R.S.V.P. form to register for the RNC Gala and Spring National Meeting along with your contribution of \$5,000 to renew your Chairman's Advisory Board membership.

Since 100 percent of Chairman's Advisory Board membership dues are strictly reserved for candidate support programs, a conference fee of \$300 is being charged to cover meeting expenses. You should enclose a check for that amount along with your membership renewal and R.S.V.P. form in the postage paid envelope I have provided.

Mrs. Wheeler, I appreciate your continuing commitment to the Chairman's Advisory Board and your outstanding support of our Party. Your membership renewal is vital to fund voter registration and get-out-the-vote programs, which are essential to GOP victory on Election Day.

I know you will enjoy attending the 2006 RNC Presidential Gala and the Spring National Meeting -- and with the future of our country at stake in the decisive elections, your participation is more important today than ever.

Thank you again for everything you do to support our President and our Party. I look forward to seeing you in Washington this May 16th and 17th.

Sincerely,



Ken Mehlman
Chairman, Republican National Committee

P.S. If you have not already registered for the Spring National Meeting and Presidential Gala, I hope you will do so today. Your participation is critical to building momentum in our Race to Victory in 2006. To R.S.V.P. and claim your two complimentary Gala tickets, please return the enclosed reservation materials with your contribution of \$5,000 to renew your Chairman's Advisory Board membership or call the Chairman's Advisory Board staff at [REDACTED]



Annual Presidential Gala

CHAIRMAN'S ADVISORY BOARD

Presidential Gala and Spring National Meeting R.S.V.P.

Dr. Martin Barschi

B06EF27L
11341958

The 2006 Republican National Committee Presidential Gala with President George W. Bush will be held May 17th, 2006 at historic Constitution Hall in Washington, D.C. The Gala is being held in conjunction with the Spring National Meeting of the Chairman's Advisory Board on May 16th-17th.

Gala and Spring National Meeting Registration

- I wish to renew my Chairman's Advisory Board membership and attend the RNC Presidential Gala on May 17th. My check for \$5,000 to renew my Chairman's Advisory Board membership commitment for 2006 is enclosed. I understand that this entitles me to two complimentary Gala tickets.

Please note, only fully paid Chairman's Advisory Board Members will be allowed to attend the RNC Presidential Gala and Spring National Meeting.

- I have enclosed an additional payment of _____ to purchase ___ guest ticket(s) @ \$1,000 each. Name of Guest: _____
- I will also attend the Chairman's Advisory Board Spring National Meeting on May 16th-17th at the Fairmont Hotel. I am enclosing an additional payment of \$300 per person for the conference fee.
- I cannot attend the RNC Gala or the Chairman's Advisory Board Spring National Meeting, but I want to renew my Chairman's Advisory Board membership for 2006 with a contribution of:
 - \$5,000 (full payment)
 - \$2,500
 - \$1,000
 - ___ Other
- I must decline your invitation at this time, but I know the RNC needs my help to lay the foundation for victory in 2006. To help support President Bush and Republican candidates at all levels, I am enclosing a special contribution of:
 - \$1,000
 - \$750
 - \$500
 - ___ Other

Please make your personal checks payable to: Chairman's Advisory Board

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS CHARITABLE CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

If you are attending the Gala and/or the Spring National Meeting of the Chairman's Advisory Board:

The Chairman's Advisory Board has reserved a block of rooms at the Fairmont Hotel in downtown Washington, D.C. Please make your reservations as soon as possible by directly calling the Fairmont Hotel at (888) 353-4040. Please ask for the special Chairman's Advisory Board group rate of \$379 for a single or a double.

RNC PRESIDENTIAL GALA 2006

CHAIRMAN'S ADVISORY BOARD

310 FIRST STREET, S.E. * WASHINGTON, D.C. 20003 * 800-762-7764 * WWW.GOP.COM

You may make your 2006 contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below. (Note: credit card MUST be personal -- not corporate.)

Type of Credit Card: VISA MasterCard American Express Discover

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

Paid for by the Republican National Committee.
 310 First Street, S.E. Washington, D.C. 20003
 Not authorized by any candidate or candidate committee.

All funds received in response to this solicitation will be subject to federal contribution limits. Federal Election law requires us to report the following information*:

Occupation*: _____

Employer*: _____

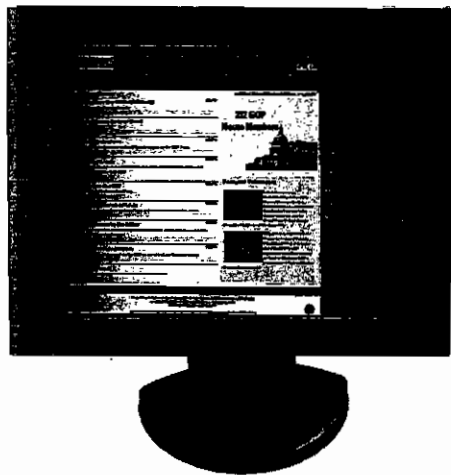
Check here if self-employed.* Telephone number: (_____) _____

E-mail address: (H) _____

(B) _____

Contributions from corporations and foreign nationals are prohibited.

To have an immediate impact you may contribute to the Chairman's Advisory Board online at www.GOP.com



If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page.

Click on the "About the GOP" button at the top of the main webpage, then select "Major Donors". Select Chairman's Advisory Board link. You will be asked to enter an email address and password. As a first time user your temporary email address will be [redacted] and your temporary password will be [redacted]. Once you enter this information, you will be prompted to create your online profile with the Chairman's Advisory Board. Your password will be emailed to you. After logging on for the first time you have the option of personalizing your password by going to the Action Center. Please keep your password for future reference.

If you are a return user and cannot remember your password when prompted, please click "Personal ID Lookup" and your password will be emailed to you.

All the Chairman's Advisory Board and RNC news, and links to other political organizations are on one site. Make the Chairman's Advisory Board your home page and log on today!

SENATOR MEL MARTINEZ
GENERAL CHAIRMAN



ROBERT M. (MIKE) DUNCAN
CHAIRMAN

JO ANN DAVIDSON
CO-CHAIRMAN

February 9, 2007

Mr. Phillips B. Hildner, II

Dear Mr. Hildner,

Recently I sent you your 2007 President's Club membership card and asked for your renewed support of President Bush and our party-building efforts for the 2007-2008 elections.

I'm concerned I've not yet heard back from you. And frankly, I worried that you've given up on our Party.

After reviewing our records, I was surprised to learn we haven't heard from you since November of 2004. If you have been delayed in renewing your membership because you feel the RNC has let you down, or no longer needs you, please let me know.

In fact, I hope you will tell me why in person by joining me at The President's Club New Chairman's Dinner here in Washington, D.C. on March 8, 2007.

The dinner will be held at the Capitol Hill Club, located adjacent to Republican National Committee headquarters, at 6 pm.

We will be discussing our Party's efforts to stop the Democrats' liberal agenda and our plans to elect Republicans at all levels in 2007-2008.

Mr. Hildner, seating at the New Chairman's Dinner is reserved for President's Club Members who have fulfilled their annual membership commitment of \$1,000.

(Next page, please)

REPUBLICAN NATIONAL COMMITTEE

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CONTRIBUTIONS TO THE RNC ARE NOT TAX DEDUCTIBLE.

To RSVP for the dinner, please return the enclosed Invitation Reply form by February 28, 2007 along with a contribution of \$1,000 to renew your President's Club membership for 2007. You may also contact Elizabeth Kelly, Director of The President's Club, at [REDACTED] with any questions you may have in regards to your membership or the dinner.

Our Party's success depends on the continued generous support of President's Club members like you.

The President and our GOP Congressional leaders need your help to thwart the Democrats' left-wing designs for America.

Liberal Democrats in the U.S. House and Senate are paving the way for higher taxes, partisan investigations of our President and the reversal of every reform we've achieved during President Bush's tenure in office.

Howard Dean, Nancy Pelosi and Harry Reid's main goal is to expand their narrow majorities in the U.S. House and Senate, and elect a Democrat to the White House in 2008, giving the Liberals total control of the federal government.

Your help is vital if we hope to stop the Democrats' power grab and rebuild our Party before the critical 2007-2008 elections.

Please reaffirm your commitment to our President and our cause by renewing your membership and attending the New Chairman's Dinner. To confirm your attendance, simply return the enclosed RSVP form or call The President's Club staff at [REDACTED]

If you cannot attend the New Chairman's Dinner, please take this chance to renew your President's Club membership for 2007 with a contribution of \$1,000, or send a partial payment of \$500 or \$250 to help our Party prepare for the challenges ahead.

On behalf of President Bush and our Party's entire leadership, thank you for your generous support. I look forward to seeing you in Washington.

Sincerely,



Robert M. (Mike) Duncan
Chairman, Republican National Committee

P.S. To RSVP for The President's Club New Chairman's Dinner on March 8 at the Capitol Hill Club, please return the enclosed reply form by February 28, with your membership renewal contribution of \$1,000. You may also call The President's Club office at [REDACTED] or email at [REDACTED]. I hope you will join me for this special evening -- it will certainly be one you don't want to miss.



REPUBLICAN NATIONAL COMMITTEE
THE PRESIDENT'S CLUB



Mr. Phillips B. Hildner, II



18424138
P07KC11L

Dear Mike,

- Yes! I will renew my President's Club membership commitment with a contribution of \$1,000 and attend the special President's Club New Chairman's Dinner in Washington, D.C. on March 8, 2007.

Please note, only fully paid President's Club Members will be allowed to attend the New Chairman's Dinner.

- No, I cannot attend the special President's Club New Chairman's Dinner in Washington, D.C. on March 8, 2007. I would, however, like to renew my President's Club membership for 2007 at this time. Enclosed is my contribution of:

\$1,000 (full payment) \$500 \$250 Other \$ _____

Please make your personal check payable to: **The President's Club**

- I did receive my 2007 President's Club membership card in good condition.
- I did not receive my 2007 President's Club membership card (or my card was incorrect). Please send a replacement.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

You may make your contribution to The President's Club by credit card if you choose by completing the information below. (Note: credit card MUST be personal — not corporate.)

Type of Credit Card: VISA MASTERCARD AMERICAN EXPRESS DISCOVER

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

Paid for by the Republican National Committee.
310 First Street, S.E. Washington, D.C. 20003
Not authorized by any candidate or candidate's committee.

All funds received in response to this solicitation will be subject to federal contribution limits.
Federal Election law requires us to report the following information*:

Occupation*: _____

Employer*: _____

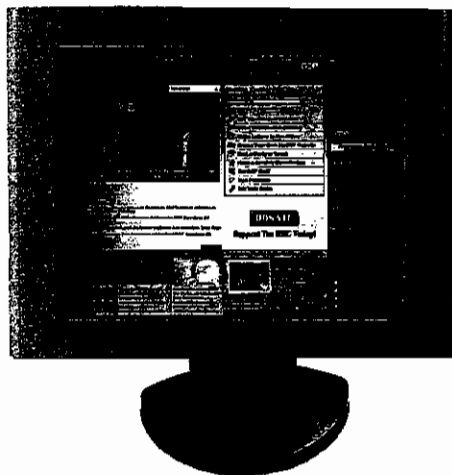
Check here if self-employed.* Telephone number: (_____) _____

E-mail address: (H) _____

(B) _____

Contributions from corporations and foreign nationals are prohibited.

**To have an immediate impact you may contribute to
The President's Club online at www.GOP.com**



**If you're a new visitor, here's how you log-on to
The President's Club home page.**

Click on the "About the GOP" button at the top of the main webpage, then select "Major Donors". Select The President's Club link. You will be asked to enter an email address and password. As a first time user your temporary email address will be [redacted] and your temporary password will be [redacted].

Once you enter this information, you will be prompted to create your online profile with The President's Club. Your password will be emailed to you. After logging on for the first time you have the option of personalizing your password by going to the Action Center. Please keep your password for future reference.

If you are a return user and cannot remember your password when prompted, please click "Personal ID Lookup" and your password will be emailed to you.

All The President's Club and RNC news, and links to other political organizations are on one site. Make The President's Club your home page and log on today!

2007 RNC

Presidential Gala

AN EVENING WITH THE PRESIDENT

SENATOR MEL MARTINEZ
GENERAL CHAIRMAN

ROBERT M. (MIKE) DUNCAN
CHAIRMAN

JO ANN DAVIDSON
CO-CHAIRMAN

Mr. Joseph H. Maloney

Dear Joseph,

On behalf of President Bush, I am honored to present to you this official invitation to the 2007 Presidential Gala.

Please join President Bush, Republican leaders of the House and Senate, and a host of our Party's luminaries at the premier event of 2007 here in Washington, D.C. on Thursday, May 10th.

I have taken the liberty of reserving a spot for you because the 2007 Presidential Gala won't be complete without you.

And it is the perfect opportunity for the President to express his gratitude to you, Joseph.

We all know you have never wavered in your loyalty and commitment, and that's why we want to recognize you for all you've done as a Sustaining Member of the Republican National Committee.

Please let me know you'll join us by filling out your R.S.V.P. Reply Form and sending it back to me by April 27th along with your contribution.

Tickets for the 2007 Presidential Gala are \$1,000 each and you may reserve a block of ten for \$10,000.

Or you can take this opportunity to become a full member of The President's Club - our nationwide, high-level network of GOP leaders - at a discounted rate of \$750 and receive one complimentary ticket to the Gala.

But even if you can't make it to Washington on May 10th, I hope you'll agree.

Over, please . . .

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET, SE ★ WASHINGTON, DC 20003 ★ 800-762-7764 ★ WWW.GOP.COM

RNC000309

Page Two

to make your presence felt, and ensure a successful event, with a special President's Club Gift.

That way President Bush will still be able to pay tribute to you for your wonderful leadership and dedication to our cause and to him personally.

And when you send in your special President's Club Gift to President Bush of \$250 or more, not only will you be there with us in spirit as we thank you for your years of service, you will receive a specially commissioned, limited edition, glass paperweight with The President's Club logo to serve as a reminder of all we've been through together.

The President knows you've been a friend through thick and thin, and that's why he wants to do something special for you even if you can't be with us in person.

So if you are unable to attend, please do us the honor of making a special President's Club Gift and send it back to us with your R.S.V.P.

The President and I will be sorry to note your absence, because this year's Presidential Gala will be about not only thanking you for the great things you've done for us, but also coming together as Republicans and rallying around a man who has done so much for our nation.

For the last six years, President Bush has led our nation with resolve, courage and strength during a pivotal time in history.

Time and time again, he has stuck to his principles, stood strong in the face of opposition, and fought for our agenda: cutting taxes, doing everything in his power to defeat terrorists wherever they are around the globe, improving homeland security, nominating conservative judges and reforming education and Medicare.

And he has led our Republican Party to some of the biggest victories we've ever had.

But his leadership has come with a heavy price.

A hostile liberal news media has been relentless in its quest to drag down his approval ratings and tarnish his legacy.

Leftist United Nations bureaucrats work every day to undermine our foreign policy and divide us from our allies.

Angry newly-empowered Democrats are doing all they can to destroy his achievements and tear him down personally.

Through it all, he has never wavered from his core beliefs of freedom,

Next page, please . . .

RNC000310

individual responsibility, the power of faith, and America's responsibility as a force for good in the world.

And he knows he would not have been able to win the campaigns in 2000 and 2004 -- much less pass our agenda -- without your loyalty.

That's why we all want to see you on May 10th. During these challenging times for our nation, with so many heavy burdens, it's only natural to want to be with long-time friends.

So please make plans to join us for the 2007 Presidential Gala in Washington.

And if you can be here for the Gala, I hope you'll also take the next step in your leadership role with our Party and participate in The President's Club 2007 Spring Meeting.

This year's Spring Meeting will take place during May 9th and 10th -- the two days leading up to the Presidential Gala.

Following registration at the Washington Court Hotel, GOP leaders from all over the United States will come together for a series of intensive strategy meetings and planning sessions, and I'd like you to be on hand for everything.

We have a lot of business to attend to, and your voice will be a valuable addition to our proceedings.

Expect a lot of frank dialogue about important issues like the War on Terrorism, taxes, judges, and what our Republican Party needs to do better as we approach the 2008 elections.

Both Republican Leaders -- Congressman John Boehner and Senator Mitch McConnell -- have been invited to talk about upcoming legislative battles with the Democrats.

We'll have a Congressional Update Panel featuring a select group of GOP House members who are working hard on our behalf.

And you won't want to miss Mrs. Lynne Cheney who we have invited to be our luncheon speaker.

So please take your place alongside your fellow GOP stalwarts -- the true backbone of the Republican Party.

Help set the direction of our Party by participating in the 2007 RNC Spring Meeting.

Over, please . . .

And please also join President Bush for the 2007 Presidential Gala.

Simply fill out your enclosed R.S.V.P. Reply Form letting me know you'll be here and send it back to me by April 27th along with your contribution -- \$1,000 for The Presidential Gala or \$1,250 to be with us for the Gala and entire President's Club Spring Meeting.

Or take advantage of my special offer to you. Become a full member of The President's Club today at a discounted rate of \$750 (normal dues are \$1,000) and you will receive one complimentary ticket to The Presidential Gala.

And Joseph, even if you can't be in Washington on May 10th, the President still wants to acknowledge your sacrifices and dedication to our Party and to him.

So please, if you are unable to attend, help ensure a successful event by making a special President's Club Gift to President Bush. Simply return your R.S.V.P. with your gift of \$250 or more, and I'll make sure you receive your specially commissioned, limited edition, glass paperweight with the President's Club logo today.

Thank you again for everything you've done for our President, our country and the Republican Party in Connecticut. I look forward to hearing from you, and to seeing you on May 10th.

Sincerely,



Robert M. (Mike) Duncan
Chairman

P.S. Joseph, President Bush knows you have done so much for him, and he wants to thank you for all of your loyalty and hard work. That's why you're invited to the 2007 Presidential Gala and RNC Spring Meeting.

Please R.S.V.P. today! Simply return your R.S.V.P. Reply Form in the envelope provided or call The President's Club staff at [REDACTED]
Or you can reply online at www.gop.com/pcgala.


And even if you can't make it, please continue your special role with the RNC by sending a special President's Club gift of \$250 or more in honor of President Bush. When you do, I'll send your limited-edition glass paperweight with the President's Club logo right away. Thanks again, for everything.

2007 RNC
Presidential Gala

AN EVENING WITH THE PRESIDENT

RSVP

TO: Robert M. (Mike) Duncan
Chairman, Republican National Committee
c/o: The President's Club

FROM: Mr. Joseph H. Maloney


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The 2007 RNC Presidential Gala with President George W. Bush will be held on May 10th at Washington, D.C.'s Historic Armory. The Gala will be held in conjunction with the Spring National Meeting of The President's Club at the Washington Court Hotel.

* The President's Club has reserved a block of rooms for a discounted rate at the Washington Court Hotel in downtown Washington, D.C. Please make your reservation as soon as possible by directly calling the Washington Court Hotel at 800-321-3010.

YES! I accept my invitation to join the RNC President's Club and plan to attend the Gala on May 10th to honor President Bush and help our Party kick off our 2008 campaign.

- \$750 for my first year membership dues and complimentary Gala ticket.
 - \$250* (Optional) I also plan to attend the Spring National Meeting on May 9th-10th and am enclosing an additional payment of \$250 to cover the cost.
 - I have enclosed an additional payment of _____ to purchase _____ Gala ticket(s) at \$1,000 each.
- \$ _____ Total

YES! I accept my invitation to join the RNC President's Club, but I do NOT plan to attend the RNC Presidential Gala on May 10th.

- \$750 for my first year membership dues (\$1,000 minus the first year membership discount of \$250).

I must decline your invitation at this time, but I wish to help our Republican Party prepare for the 2008 elections. I am enclosing a contribution of:

- \$500
- \$250**
- \$100
- Other \$ _____

**I am enclosing a contribution of \$250 or more. Please send me my specially commissioned, limited edition, glass paperweight with the President's Club logo today.

Please make *personal checks* payable to:

The Republican National Committee and add *Presidential Gala* to the memo line.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

Please see reverse for important contributor information or to make a gift by credit card.

2007 RNC
Presidential Gala

AN EVENING WITH THE PRESIDENT

The President's Club
2007 Spring National Meeting & Presidential Gala
May 9th and 10th, 2007

AGENDA

Washington Court Hotel
525 New Jersey Ave., NW
Washington, D.C. 20001
1-800-321-3010
www.washingtoncourthotel.com

Wednesday, May 9, 2007

11:00 a.m. – 5:30 p.m. Registration
Location: Washington Court Hotel

6:30 p.m. – 8:30 p.m. Dinner
Location: Washington Court Hotel
House Republican Leader John Boehner (OH)*

Thursday, May 10, 2007

8:00 a.m. – 3:00 p.m. Registration
Location: Washington Court Hotel

8:15 a.m. – 9:00 a.m. Breakfast
Senator Mitch McConnell (KY)*

9:00 a.m. – 9:45 a.m. Political Update
Rich Beeson, RNC Political Director

9:45 a.m. – 10:00 a.m. Break

10:00 a.m. – 11:00 a.m. Congressional Update Panel
Rep. Jeff Flake (AZ)*
Rep. Lynn Westmoreland (GA)*
Rep. Marsha Blackburn (TN)*
Rep. Eric Cantor (VA)*
Rep. Mike Pence (IN)*

11:00 a.m. – 12:00 p.m. Briefing
Secretary Elaine Chao*

12:00 p.m. – 12:30 p.m. Break

12:30 p.m. – 1:15 p.m. Luncheon Speaker
Mrs. Lynne Cheney*

1:30 p.m. – 2:45 p.m. Afternoon Session
Ed Gillespie*
Book Signing to Follow – *Winning Right*

5:00 p.m. Afternoon Free
2007 RNC Presidential Gala
Special Guest: President George W. Bush
Location: Washington, D.C.'s Historic Armory

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Dress for all events is business attire.
**Indicates invited speaker, not confirmed.*



Benefits of Membership

As a President's Club Member, you'll have unprecedented access to Republican Party leaders and elected officials, plus you'll receive invitations to our high-level events. Along with your fellow members of the Republican Party's upper echelon, we want you to participate in all three of our national meetings each year in addition to the annual RNC Presidential Gala – the premier gathering of Republicans nationwide.

AS A MEMBER OF THE PRESIDENT'S CLUB, YOU WILL RECEIVE:

- ★ Regular emails that provide up-to-date political information and important Party news.
- ★ Members-only access to The President's Club website, which features information on campaigns and upcoming events.
- ★ Exclusive Member-only Internet chats with Party leaders and elected officials.
- ★ The President's Club staff at the Republican National Committee serves as your personal contact at national party headquarters and stands ready to assist members with up-to-date information on President's Club activities.
- ★ A toll-free membership hotline provides you with direct access to The President's Club headquarters at the RNC during office hours.
- ★ President's Club members receive a distinctive Lapel Pin identifying them as part of the GOP's grassroots leadership, a personalized membership card and a subscription to the RNC's quarterly political news magazine, *Rising Tide*.

HISTORY AND PURPOSE

The President's Club was founded soon after President Ronald Reagan took his oath of office to help him spread his message of freedom at home and strength in the face of evil abroad.

Since our founding in 1981, The President's Club has worked to unite the most dedicated Republicans nationwide around one principle: giving Republican Presidents the support they need to fight for our values.

Today, The President's Club helps GOP candidates at all levels and works to ensure President George W. Bush builds a lasting legacy.

"The challenge of statesmanship is to have the vision to dream of a better, safer world and the courage, persistence, and patience to turn that dream into reality."

— Ronald Reagan, 1985

SENATOR MEL MARTINEZ
GENERAL CHAIRMAN



CHAIRMAN'S
ADVISORY BOARD

ROBERT M. (MIKE) DUNCAN
CHAIRMAN

JO ANN DAVIDSON
CO-CHAIRMAN

February 9, 2007

Mr. Lynn J. Brinker
[REDACTED]

Dear Mr. Brinker,

I'm following up my recent letter to you in which I sent your new 2007 Chairman's Advisory Board membership card.

I wanted to make sure your card reached you safely -- and to also personally invite you to attend the Chairman's Advisory Board New Chairman's Dinner here in Washington, D.C. on March 8, 2007.

The dinner will be held at the Capitol Hill Club, located adjacent to Republican National Committee headquarters, at 6 pm.

Intimate dinners like this are my favorite because I get to thank you in person for your commitment to our President and our cause.

It is also a great way for me to reconnect with Board members whom I've had the good fortune of meeting at past gatherings, and to greet those I've not yet had the pleasure to be introduced to. I hope you will join me in Washington for what is certain to be an entertaining and informative evening.

We will be discussing our Party's efforts to stop the Democrats' liberal agenda and our plans to elect Republicans at all levels in 2007-2008.

Mr. Brinker, seating at the New Chairman's Dinner is reserved for Chairman's Advisory Board Members who have fulfilled their annual membership commitment of \$5,000.

To RSVP for the dinner, please return the enclosed Invitation Reply form by

(Next page, please)

REPUBLICAN NATIONAL COMMITTEE

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CONTRIBUTIONS TO THE RNC ARE NOT TAX DEDUCTIBLE.

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Page two -- Mr. Lynn J. Brinker

February 28, 2007 along with a contribution of \$5,000 to renew your Chairman's Advisory Board membership for 2007. You may also contact Elizabeth Kelly, Director of the Chairman's Advisory Board, at (800) 762-7764 with any questions you may have in regards to your membership or the dinner.

Our Party's success depends on the continued generous support of Chairman's Advisory Board members like you.

The President and our GOP Congressional leaders need your help to thwart the Democrats' left-wing designs for America.

Liberal Democrats in the U.S. House and Senate are paving the way for higher taxes, partisan investigations of our President and the reversal of every reform we've achieved during President Bush's tenure in office.

Howard Dean, Nancy Pelosi and Harry Reid's main goal is to expand their narrow majorities in the U.S. House and Senate, and elect a Democrat to the White House in 2008, giving the Liberals total control of the federal government.

Your help is vital if we hope to stop the Democrats' power grab and rebuild our Party before the critical 2007-2008 elections.

Please reaffirm your commitment to our President and our cause by renewing your membership and attending the New Chairman's Dinner. To confirm your attendance, simply return the enclosed RSVP form or call the Chairman's Advisory Board staff at [REDACTED]

If you cannot attend the New Chairman's Dinner, please take this chance to renew your Chairman's Advisory Board membership for 2007 with a contribution of \$5,000, or send a partial payment of \$2,500 or \$1,000 to help our Party prepare for the challenges ahead.

On behalf of President Bush and our Party's entire leadership, thank you for your generous support. I look forward to seeing you in Washington.

Sincerely,



Robert M. (Mike) Duncan
Chairman, Republican National Committee

P.S. To RSVP for the Chairman's Advisory Board New Chairman's Dinner on March 8 at the Capitol Hill Club, please return the enclosed reply form by February 28, with your membership renewal contribution of \$5,000. You may also call the Chairman's Advisory Board office at [REDACTED] or email at [REDACTED]. I hope you will join me for this special evening -- it will certainly be one you don't want to miss.



REPUBLICAN NATIONAL COMMITTEE
CHAIRMAN'S ADVISORY BOARD

RSVP

Mr. Lynn J. Brinker



14130005
B07KC27L

Dear Mike,

- Yes! I will renew my Chairman's Advisory Board membership commitment with a contribution of \$5,000 and attend the special Chairman's Advisory Board New Chairman's Dinner in Washington, D.C. on March 8, 2007.

Please note, only fully paid Chairman's Advisory Board Members will be allowed to attend the New Chairman's Dinner.

- No, I cannot attend the special Chairman's Advisory Board New Chairman's Dinner in Washington, D.C. on March 8, 2007. I would, however, like to renew my Chairman's Advisory Board membership for 2007 at this time. Enclosed is my contribution of:

- \$5,000 (full payment) \$2,500 \$1,000 Other \$_____

Please make your personal check payable to:
Chairman's Advisory Board

- I did receive my 2007 Chairman's Advisory Board membership card in good condition.
- I did not receive my 2007 Chairman's Advisory Board membership card (or my card was incorrect). Please send a replacement.

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

You may make your contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below. (Note: credit card MUST be personal — not corporate.)

Type of Credit Card: VISA MasterCard AMERICAN EXPRESS DISCOVER

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

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Employer*: _____

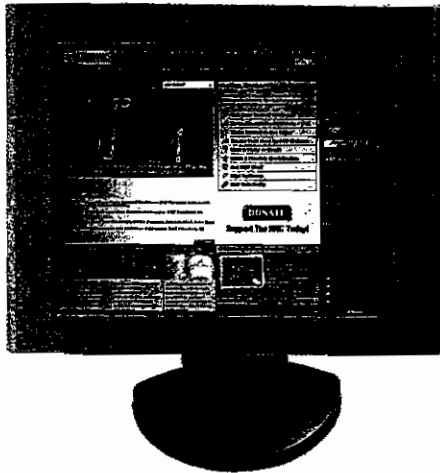
Check here if self-employed.* Telephone number: () _____

E-mail address: (H) _____

(B) _____

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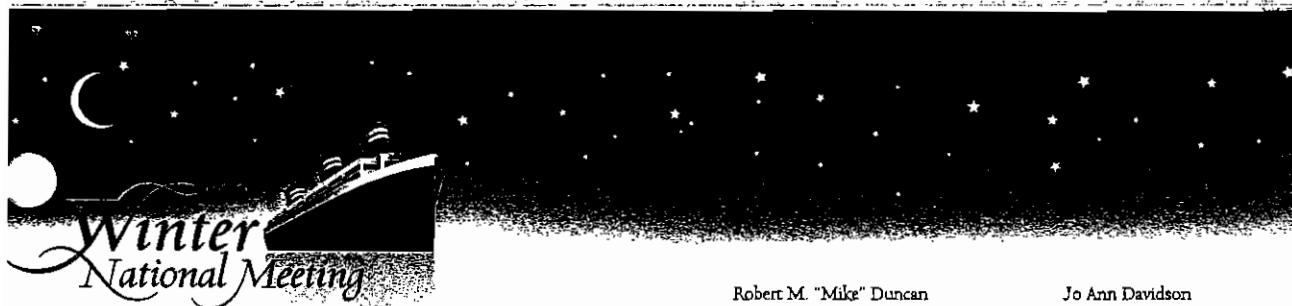


If you're a new visitor, here's how you log-on to the Chairman's Advisory Board home page.

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If you are a return user and cannot remember your password when prompted, please click "Personal ID Lookup" and your password will be emailed to you.

All the Chairman's Advisory Board and RNC news, and links to other political organizations are on one site. Make the Chairman's Advisory Board your home page and log on today!



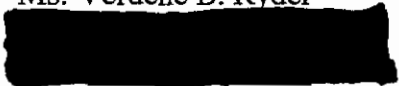
CHAIRMAN'S ADVISORY BOARD

Robert M. "Mike" Duncan
Chairman

Jo Ann Davidson
Co-Chairman

December 14, 2007

Ms. Verdene B. Ryder



Dear Ms. Ryder,

All hands on deck!

The Chairman's Advisory Board is preparing for the most important election in a generation, and I hope you will join us in Washington, D.C. on January 30th and 31st as we embark on a Voyage to Victory in 2008.

The highlight of our upcoming Chairman's Advisory Board Winter National Meeting is a welcome reception and starlight cruise on the Potomac River, with special guest Rich Galen, former Press Secretary for Vice President Dan Quayle and Speaker Newt Gingrich, followed by an intimate dinner at the Capital Grille.

I know you'll enjoy hearing an inside evaluation of how the 2008 election is shaping up while we take in our nation's capital's beautiful skyline by night. The next day we'll gather for the business portion of the meeting at the Grand Hyatt Hotel.

Because of your strong dedication and support of the Republican Party as a Chairman's Advisory Board member, I have reserved a special place for you.

The involvement of Board members like you is crucial to our prospects for success in 2008, Ms. Ryder. We want you with us as we begin our journey towards Minneapolis/Saint Paul and the 2008 Republican National Convention next September.

Please take a minute right now to return your **2008 Winter National Meeting** RSVP to me in the special envelope I've enclosed to reserve your place today. Only fully-paid members may attend, so please complete your membership with a contribution of \$3,000. Then make your travel plans to join me

(Over, please)

Page Two – Ms. Verdene B. Ryder

in Washington on January 30th and 31st.

As a valued member of the Chairman's Advisory Board, two seats at The **2008 Winter National Meeting** are reserved exclusively for you. Additional tickets for guests may be purchased for \$1,250 each.

Ms. Ryder, we have less than a year to ensure that our candidates running for office -- from the race to succeed President Bush in the White House to congressional, gubernatorial and local contests throughout our country -- have the resources they need to run strong campaigns and win.

Less than a year to get our message of lower taxes, limited government, strong national defense and individual freedom past the liberal media filter and directly to the voters.

And less than a year to build on our growing momentum. Our collective effort helped elect Republican governors in Louisiana and Mississippi just last month. These victories proved again just how valuable a strong grassroots infrastructure is to electing Republicans at all levels.

Chairman's Advisory Board members are the heart of that grassroots support. As we pick up steam in the early months of 2008, the input and energy of Board members like you is vital to our strategy and preparations, and that's why your attendance at this year's meeting is so especially important.

Following our starlight cruise with Rich Galen and dinner at the Capital Grille, on the evening of Wednesday, January 30th, we'll reconvene the next morning at the Grand Hyatt Hotel for an exciting round of updates on our election preparations.

RNC Treasurer, Tim Morgan will be the emcee for Thursday's speaking series, which will begin during breakfast with Co-Chairman Jo Ann Davidson offering an update for members attending the 2008 Convention in Minnesota.

After that, Senator John Thune of South Dakota will offer an insiders perspective on the battle for control on Congress.

Finally, we will wrap up with a working lunch, and a complete break down

(Next page, please)

Page Three – Ms. Verdene B. Ryder

of the 2008 elections by two of Washington's prominent pollsters.

I hope you will join us on January 30th and 31st as we hoist our sails and get underway for the Voyage to Victory. Space is limited, so please return your RSVP today so you don't miss out on our kick off to this historic election year.

Even if you cannot attend our Voyage to Victory, I hope you will make a payment towards your Chairman's Advisory Board membership of \$3,000, \$1,500, or \$1,000 to support our 2008 campaign efforts and help keep our Party moving forward toward the election of a new Republican president and Congress.

Thank you again for everything you do, Ms. Ryder. I look forward to your response, and to seeing you in Washington. Have a safe and happy holiday season!

Sincerely,



Robert M. "Mike" Duncan
Chairman, Republican National Committee

P.S. Ms. Ryder, we're raising anchors and setting out on our Voyage to Victory in 2008, and I hope you'll be aboard. The Chairman's Advisory Board Winter National Meeting will be held on January 30th and 31st in Washington, D.C. To join us, please RSVP by January 18, 2008.

Let me know today by returning your RSVP card in the envelope provided or call our Chairman's Advisory Board staff at [REDACTED]. You can also reply online at: [REDACTED]. Remember, only fully-paid members may attend, so please include a contribution of \$3,000, \$1,500, or \$1,000 to complete your Chairman's Advisory Board membership and help us navigate our way to victory next November. See you in Washington!



CHAIRMAN'S ADVISORY BOARD

To	Robert M. "Mike" Duncan	Member ID [Redacted]	Code B07ABP007
From	Ms. Verdene B. Ryder [Redacted]		

Memorandum

Dear Mike,

Thank you so much for inviting me to the 2008 Winter National Meeting!

- I wish to attend the Chairman's Advisory Board Winter National Meeting. Enclosed is my conference fee of \$250 and \$3,000 to complete my membership commitment.
- I have enclosed an additional \$1,250 for each additional guest(s).

Guest Name(s): _____

Guest Name(s): _____

- I cannot attend the Chairman's Advisory Board Winter National Meeting, but I know our candidates need my help. To support our 2008 election preparations, I am completing my membership with a contribution of:

\$3,000 \$1,500 \$1,000 Other \$ _____

Please make checks payable to:
Chairman's Advisory Board.
To make your contribution by credit card, please see reverse side.



Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

Republican National Committee

Robert M. "Mike" Duncan
Chairman

Jo Ann Davidson
Co-Chairman

March 21, 2008

Ms. Veronica Nagymihaly
[REDACTED]

Dear Ms. Nagymihaly,

Will you join me and President George W. Bush, former President George H.W. Bush and former Governor Jeb Bush in Crawford, Texas?

As a true and loyal friend of the President and one of our Grand Old Party's key Florida leaders, I am pleased to invite you to a truly unique gathering on April 10th and 11th. We'll kick things off with a welcome reception in Dallas on the 10th then travel to the ranch in Crawford on the 11th for a private photo opportunity and a good, old-fashioned Texas barbeque with the President, his father and brother.

And because this special, private gathering is limited to the President's closest friends and supporters, I've simply got to know if you're coming in the next 72 hours to make sure we reserve a spot for you.

Please take a moment to return the enclosed RSVP Reply to me in the postage-paid envelope I've provided. Then plan to be with us on April 10th and 11th . . . and don't forget your cowboy boots and Stetson hat! No ties allowed.

The Crawford barbeque is part of the Republican Eagles tribute to the Bush family. And it is open only to Republican Eagles as a way to say thank you.

More importantly, it may very well be the very last time the Republican Eagles gather with President Bush in Crawford so it is sure to be a special event.

As you know, the Republican Eagles are our Party's oldest and most prestigious leadership group, a veritable Who's Who of Republicans. The Eagles serve at the pleasure of the President. They are his closest advisers and confidants within the Republican Party, and his personal eyes and ears across the country.

Ms. Nagymihaly, membership in the Republican Eagles is not offered to everyone. Because of your consistent and steadfast support of President Bush and your long years of service to our country and our Party, you've more than earned the right to be an Eagle.

That is why I sincerely hope you will accept my invitation to join President Bush,

Next page, please . . .



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800-762-7764 * www.GOP.co

RNC000347

Page Two -- Ms. Veronica Nagymihaly

his father, "41" and Governor Jeb Bush and me in Crawford, Texas by becoming a 2008 Republican Eagle.

The annual commitment to the Eagles is \$15,000 but because of your previous generosity, we will credit your previous contributions of \$1,240 to your 2008 Eagles membership and reduce your dues to only \$13,760. You've earned that too!

So please say "Yes." Become a Republican Eagle!

Take a moment right now to return the RSVP Form to me in the postage-paid envelope I've enclosed. Then plan to be with the President, former President George H.W. Bush and former Governor Jeb Bush on April 10th and 11th in Crawford.

Of course, if you are unable to join us in Crawford, please know I understand. And while I know the President will be especially disappointed, he has asked me to make sure I honor your loyalty and your steadfast support.

So even if you cannot be with us, I hope you will accept your very own framed commemorative edition color photograph, of the "Three Leaders," the President, "41" and Governor Jeb Bush. This stunning photo will be signed by all three Bush family members to you in appreciation for your long support of the family. And if you cannot be with us in Crawford, all you need do to receive your personalized photograph is return the RSVP along with your gift of \$1,500. I've taken the liberty of reserving one for you.

Ms. Nagymihaly, I hope you will be able to join President Bush at the ranch in Crawford. If you have any questions regarding the event or your Republican Eagles membership, please call [REDACTED]

And again, thank you for all you've done for President Bush and for our nation. No one deserves this honor more than you.

Sincerely,



Robert M. "Mike" Duncan
Chairman, Republican National Committee

P.S. Remember Ms. Nagymihaly, membership in the Republican Eagles is not offered to everyone. And this April 10th and 11th barbeque may well be the very last meeting of the Republican Eagles with the President in Crawford. So I hope you will accept your membership in the Eagles and plan to join President Bush and me in Crawford. Just return your Reply along with your \$13,760 in the special envelope I've enclosed.



Republican Eagles

RUSH FAMILY TRIBUTE

Membership Acceptance Form



P08AGU021
102544187

Ms. Veronica Nagymihaly



The 2008 Republican Eagles Bush Family Tribute and Crawford Barbeque with President George W. Bush, former President George H.W. Bush and former Governor Jeb Bush will be held on April 10 and 11. This is just the beginning of the opportunities for your involvement with our oldest and most recognized Republican donor group, the Eagles. Eagles membership entails an annual contribution of \$15,000, but with your credit of \$1,240 from your President's Club membership, your 2008 Eagles dues will only be \$13,760.

Membership Information and Republican Eagles Bush Family Tribute Registration

I wish to join the Republican Eagles and attend the 2008 Bush Family Tribute on April 10 & 11. I have enclosed my membership dues of \$13,760 to become a fully paid member.

Please make your personal check payable to: **Republican Eagles**

I cannot attend the 2008 Republican Eagles Bush Family Tribute, but I accept your invitation to join the Republican Eagles at the special membership rate of \$13,760. Enclosed is my check for:

\$13,760 (full payment) \$6,880 \$4,585 \$___ Other

Please make your personal check payable to: **Republican Eagles**

Framed Personalized Commemorative Photo

I cannot attend the 2008 Republican Eagles Bush Family Tribute, but I want to continue to support the Republican National Committee and wish to receive a framed personalized photograph from President George W. Bush, former President George H.W. Bush and former Governor Jeb Bush. Enclosed is my special contribution of:

\$3,000 \$2,000 \$1,500* Other \$_____

*Minimum contribution of \$1,500 is required to receive a framed personalized photograph

Please make your personal check payable to: **President's Club**

CONTRIBUTIONS TO THE REPUBLICAN NATIONAL COMMITTEE ARE NOT DEDUCTIBLE AS Charitable CONTRIBUTIONS FOR FEDERAL INCOME TAX PURPOSES.

If you are attending the Republican Eagles Bush Family Tribute:
The Republican Eagles have reserved blocks of rooms at the Four Seasons Resort and Club. Please call 1-800-762-7764 to make reservations.



Robert M. "Mike" Duncan
Chairman

Jo Ann Davidson
Co-Chairman

April 11, 2008

Mr. Leonard L. Mazur

Dear Mr. Mazur,

As one of the top supporters of the Republican National Committee, your attendance at a very important event is requested.

For the first time in eighty years, neither a sitting president nor vice president is running for the White House. But this year's election is more than historic -- it represents the choice between two fundamentally different views and which direction our country will take in the future.

Our effort to win Republican victories at all levels this November requires a unified, enthusiastic GOP team, and I'm counting on Chairman's Advisory Board members to lead the way.

As we move closer to Election Day, the input and support of Board members is essential to our prospects for victory. This year's remaining activities recognize that importance, and I hope you will be able to join us.

That's why it is now my great pleasure to invite you to come to Washington, D.C. this May 14th and 15th to gather with your fellow Chairman's Advisory Board members for our annual Spring National Meeting.

You will also receive two complimentary tickets to attend the 2008 Republican Gala featuring special guest and presumptive presidential nominee **Senator John McCain** on the evening of May 15th.

The event offers the perfect opportunity for key grassroots leaders like you to take part in our Party's preparations during this historic and crucial presidential election year.

We'll begin on the evening of Wednesday, May 14th with a reception at President George Washington's Estate at Mount Vernon on the Potomac. You will be taken on a

(Over, please)

Page Two -- Mr. Leonard L. Mazur

private tour of this historic plantation and home of our Nation's founding First Family. At the reception, a great line-up of speakers will update us on the political climate in this pivotal election year, followed by a dinner with a special guest.

The next day, the Chairman's Advisory Board members will meet for breakfast where political operatives will offer their thoughts on the presidential race before we embark on a V.I.P. tour of Washington, D.C.

We'll visit the National Mint to see how our currency is made, tour the Nation's monuments with a private docent culminating with a luncheon at Charlie Palmer Steak which is located at 101 Constitution, the closest commercial building to the Capitol making it a premier place for politicians to meet.

Following our afternoon activities, we will make our way to the historic Mellon Auditorium for the 2008 Gala with presumptive presidential nominee **Senator John McCain**. Because of your steadfast support for the RNC, we are offering you two complimentary tickets for this exciting event.

Mr. Mazur, this is a great opportunity to experience an inside view of our Nation's Capital and set the tone for a spirited campaign for Republican victories up and down the ticket this November.

Only fully-paid members are invited to attend the Spring National Meeting and receive two complimentary tickets to attend the 2008 Republican Gala, so please complete your membership with a contribution of \$4,000, today. To attend our Spring National Meeting activities on May 14th and 15th, also, there is a \$250 fee in order to cover meeting expenses.

Your involvement as a Chairman's Advisory Board member is vital to our Republican campaign efforts, and I hope you'll be here to help us plan momentum for the tough election fight ahead.

Our Democrat opponents and their liberal allies will stop at nothing to recapture the White House, expand their grip on Congress, and complete their takeover of the federal government.

They are working to win control in both state houses and courthouses across the country to redraw congressional and legislative districts to their benefit and impose their leftist agenda locally. We can not allow the Democrats to take control of every level of our country's government.

Democrats are eager to drag America leftward by reinstalling their tax-and-spend, red-tape bureaucracy, nanny state interference, weakened defense and timid foreign policies that have failed in the past.

Our Party must stop them, and bring commonsense, principled conservative leadership to American governance from the White House to the local courthouse. And it all starts here – be at the Spring National Meeting and be a part of history.

(Next page, please)

RNC000364

Page Three -- Mr. Leonard L. Mazur

We hope that you can join us at the upcoming May events. You will be missed if you cannot attend, but I hope you will make a payment towards your Chairman's Advisory Board membership of \$4,000, \$2,670, or \$2,000 to support our 2008 campaign efforts and help make sure we retain the White House, regain our majorities in Congress, and achieve victory at all levels. With your minimum special contribution of \$250, you will receive an exclusive commemorative item from the 2008 Spring National Meeting.

And remember, our historic presidential election year continues as we gather later this September for the Republican National Convention in Minneapolis-St. Paul. This community is ready to host our convention with all of the hospitality, culture, history, and beautiful architecture that makes this metropolis famous.

We are in the planning stages for an exciting schedule of the Chairman's Advisory Board events to coincide with the Convention. We know you'll look forward to interacting with Republican leaders from across the government and throughout the country.

This year's Chairman's Advisory Board events truly reflect the historic importance of this year's elections and the key role Board members will play in ensuring Republican victories.

We want you to come be a part of our Republican effort to make history. Please return your RSVP today and join us here in Washington next month. I look forward to seeing you and celebrating our Party's past and future success together.

Thank you again for everything you do.

Sincerely,



Robert M. "Mike" Duncan
Chairman, Republican National Committee

P.S. Mr. Mazur, you won't want to miss our May 2008 events, including the Republican Gala with presumptive presidential nominee **Senator John McCain**. Please join your fellow Chairman's Advisory Board members and our Party's leadership in Washington, D.C. to help energize our Party and begin the journey to victory this November. If you plan to attend, please let me know by April 30, 2008. Return your RSVP card in the envelope provided or call our Chairman's Advisory Board staff at [REDACTED] You can also reply online at: [REDACTED] And when you do, I hope you will make a contribution of \$4,000, \$2,670, or \$2,000 to support our efforts for victory this November. See you in Washington!



To: Robert M. "Mike" Duncan

From: Mr. Leonard L. Mazur



108201115 B08AIP003

Dear Mike,

Thank you so much for inviting me to the 2008 Spring National Meeting!

- I will attend the Chairman's Advisory Board Spring National Meeting on May 14th and 15th. I am completing my membership with a \$4,000 contribution. My meeting fee of \$250 is also enclosed for a total of \$4,250.
- I also wish to attend the 2008 Republican Gala on May 15th.
- I have enclosed an additional \$1,250 for each additional guest.
Guest Name(s): _____
- I cannot attend the upcoming May events, but I know our candidates need my help. To support our 2008 election preparations, I am completing my membership with a contribution of:
 - \$4,000 \$2,670 \$2,000 Other \$ _____

*\$250 minimum to receive exclusive commemorative item from the 2008 Spring National Meeting

- Please send information about the Republican National Convention.

Please make personal checks payable to: **The Chairman's Advisory Board.**

Contributions to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

The Chairman's Advisory Board has reserved rooms at the Hotel Monaco in Old Town Alexandria, VA. Please make your reservations as soon as possible by calling 1-800-368-5047 and asking for the Republican National Committee Room block.

340 First Street, S.E. ★ Washington, D.C. 20003 ★ www.GOP.com

RNC000366

All funds received in response to this solicitation will be subject to federal contribution limits. Federal election law requires us to report the following information*:

Occupation*: _____

Employer*: _____

Please check if self-employed.*

Telephone number: _____

E-mail address: (H) _____

(W) _____

Contributions from corporations and foreign nationals are prohibited.

You may make your contribution to the Chairman's Advisory Board by credit card if you choose by completing the information below: (Note: credit card MUST be personal -- not corporate.)

Type of Credit Card: Visa MasterCard American Express Discover

Credit Card Number: _____ Expiration Date: _____

Name as it Appears on Card: _____ Amount of Gift: \$ _____

Signature: _____

To have an immediate impact you may contribute to the Chairman's Advisory Board online at www.GOP.com.

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310 First Street, SE • Washington, DC • (202) 863-8500 • www.gop.com
Not authorized by any candidate or candidate's committee.

ROBERT M. "MIKE" DUNCAN
CHAIRMAN



CHAIRMAN'S
ADVISORY BOARD

JO ANN DAVIDSON
CO-CHAIRMAN

July 1, 2008

Ms. Ruth R. Spira



Dear Ms. Spira,

On June 17-19, 1856, members of a new political party met in Convention to nominate their first candidate for the office of President of the United States. The Republican Party was established that year as the Party of the future as our presidential candidate won 33% of the vote.

Today, 152 years later, our Party remains the Party of the future. And in a few months, we will once again gather to nominate the next President of the United States.

Ms. Spira, on behalf of John McCain, our Republican candidates at all levels and the Chairman's Advisory Board, I am proud to extend you this invitation to attend the 2008 Republican National Convention from August 31 through September 4, in Minneapolis-St. Paul, Minnesota.

As a member of the Chairman's Advisory Board, you are entitled to VIP accommodations and guest privileges at the Convention. This includes both passes for Convention sessions and an exciting agenda of members-only special events.

I must stress that only Chairman's Advisory Board members in good standing -- members who have paid their full membership dues of \$5,000 by August 15, 2008 -- are eligible to attend the 2008 Republican National Convention.

You should have received a formal invitation with complete Convention details and the Chairman's Advisory Board Convention agenda. Please watch your mail for this important package as it will contain the forms you need to officially register to attend.

For most of us, attendance at a National Convention is a once-in-a-lifetime

(Over, please)

Page Two -- Ms. Ruth R. Spira

experience. From keynote addresses to the Roll Call of States to the acceptance speech by our presidential nominee, you will witness history in the making.

You will also help launch our Party's final push to victory in one of the most important elections in a generation. I hope you will be able to attend.

And if you can, I hope you will also take this opportunity to send in a special Chairman's Advisory Board contribution of \$8,000, \$6,000 or \$4,000 to help keep our Party on track this important campaign season.

Ms. Spira, your continued support is vital. We must elect a Republican president and Congress if we are to move America forward with our common-sense policies of lower taxes, smaller government, individual freedom and victory in the war against radical Islamic extremism.

With loyal supporters like you on board, I know we can do it. But winning will not be easy.

The Democrats are determined to expand their majorities in the U.S. House and Senate, and recapture control of the White House.

The presumptive Democrat presidential nominee has raised an unprecedented sum of campaign cash -- and Democrats have registered millions of new voters -- during the primaries.

Big Labor, the trial lawyers, radical propoganda groups backed by leftist billionaires like George Soros and Hollywood elitists have pledged to spend nearly \$750 million to seize total control of our government.

Only with the help of Chairman's Advisory Board members like you can we hope to counter the hundreds of millions of dollars Democrats and their left-wing special interest cronies will spend attacking our candidates and agenda.

Your special Chairman's Advisory Board contribution of \$8,000, \$6,000 or \$4,000 to the RNC will go a long way to helping elect John McCain and Republicans up and down the ticket.

Ms. Spira, I hope you will choose to join us, and I look forward to seeing you in Minneapolis-St. Paul.

Sincerely,



Robert M. "Mike" Duncan
Chairman, Republican National Committee

P.S. Your formal Convention Invitation and Information packet was recently sent to you by our travel experts. If you have further questions about your membership or about the Convention, please feel free to call the Chairman's Advisory Board staff at [REDACTED]

[REDACTED] Thank you.



REPUBLICAN NATIONAL CONVENTION 2008

Chairman's Advisory Board



Funds received in response to this solicitation will be subject to federal contributions limits. Federal election law requires us to report the following information.*

Occupation:*

Employer:*

Please check if self-employed.*

Telephone number:

Email Address: (H)

(W)

Contributions from corporations and foreign nationals are prohibited.

Paid for by the Republican National Committee and authorized by John McCain 2008.
310 First Street S.E. Washington, D.C. 20003

CONVENTION PRE-REGISTRATION FORM

Ms. Ruth R. Spira

I am pleased to accept your early invitation to attend the Republican National Convention as a member of the Chairman's Advisory Board.

I am sorry I am unable to attend the Republican National Convention, but to help launch the final phase of the 2008 campaign, I would like to send a special contribution to the Chairman's Advisory Board of:

- \$8,000 \$6,000
- \$4,000 Other \$ _____

Please make your personal check payable to: Chairman's Advisory Board.

Contributions or gifts to the Republican National Committee are not deductible as charitable contributions for federal income tax purposes.

RNC000371

B08APF001 145154150

You may make your contribution to the Chairman's Advisory Board by credit card by completing the information below: (Note: credit card MUST be personal -- not corporate.)

Type of Credit Card:

- VISA MasterCard
- American Express Discover

Credit Card Number

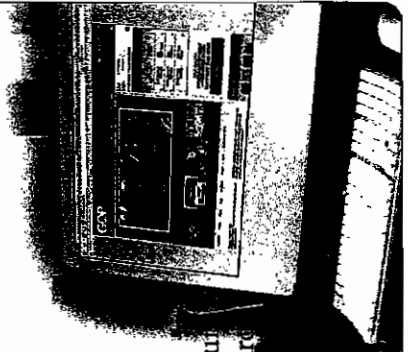
Expiration Date

Amount of Gift

Name as it Appears on Card

Signature

To have an immediate impact, you may also contribute to the Republican National Committee online at www.GOP.com or call our Chairman's Advisory Board Staff at _____ to donate by phone. Thank you.



FEC Exhibit 9



Sign-up for News & Information

Email Address

Go

HOME

NEWS ROOM

CALENDAR OF EVENTS

ABOUT THE PARTY

YOUR COUNTY

CONTACT

Golden State Leadership Team

Sun, Mar 8, 2009

Join the California Republican Party Golden State ★★★ Leadership Team

Joining the Golden State Leadership Team is one of the best ways to help put Republican ideas into action in California.

Members of the Team work closely with California's Republican candidates and officials, sharing information on today's important issues, and keeping Team members informed on the Republican campaign every step of the way. It's a close relationship where members of the Team are well recognized for their important support of the Republican campaign.

Golden State Leadership Team member contributions stay right here in California, helping to elect Republican candidates for federal, state and important local offices.

Ron Nehring, Chairman

» [Contribute or Join a Donor Club Online](#)
Or...

» [Download Membership Application](#)

For your convenience, we offer our Golden State Leadership Team members an Easy-Pay Option. With Easy-Pay, there is no check writing.

Instead, your contribution is automatically withdrawn monthly from your credit card.

Membership Levels:

Chairman's Council

Membership: \$1,000 per year contribution

Includes these benefits:

- Golden State Leadership Team Lapel Pin
- Quarterly CRP Update Conference Call
- Invitation to Regional CRP Campaign Briefings
- Special reduced ticket prices for CRP Convention Meal functions, VIP Receptions and Fundraising Events
- Access to Golden State Leadership Team Suite at CRP Conventions
- Priority seating at all CRP Convention meal functions

Golden Circle

Membership: \$2,500 per year contribution

Includes all of the benefits of the Chairman's Council plus:

- Invitation to CRP Campaign Briefing Conference Calls
- Access to Golden State Leadership Team Suite at CRP Conventions
- Priority seating at all CRP Convention meal functions
 - One complimentary Ticket to CRP Convention meal functions and VIP Receptions with special reduced prices for all additional tickets
- Invitation to all regional and statewide CRP events for 50% off the ticket price
- Invitation to Capitol Caucus Day in Sacramento featuring Reception with Key Decision Makers and Political Figures

Leadership Circle

Membership: \$5,000 per year contribution

Includes all of the benefits of the Golden Circle plus:

- Two complimentary Tickets to CRP Convention meal functions and VIP Receptions with special reduced prices for all additional tickets
- Intimate Business Roundtable Events with Republican California Legislators

Golden Bears

Membership: \$10,000 per year contribution

Includes all of the benefits of the Leadership Circle plus:

- VIP accommodations at all regional and statewide CRP events for 50% off the ticket price
- Complimentary accommodations at CRP Conventions
- Invitations to Major Donor events throughout the state

Contact: Anne Saro, asaro@cagop.org, 619-787-7187

Contributions to the California Republican Party are non-tax deductible for Federal or California tax purposes. Corporate contributions will be used in California state elections. These contributions may be made in any amount. Individual contributions will be used in both federal and California state elections and may also be made in any amount. Contributions to the state committee are unlimited, and may be allocated as follows: up to \$30,200 per calendar year for direct state candidate support, with amounts in excess used for permissible non-direct candidate support purposes. Such contributions may also be used for federal Levin account purposes, up to \$10,000 per individual, corporate or PAC donor. Federal and California law requires political committees to report the name, mailing address, occupation and employer for each donor whose contributions aggregate \$100 or more per calendar year. Any contributor making \$10,000 or more in combined contributions in a calendar year to state or local political party committees, including the CRP; candidates; PACs; and/or ballot measure committees must file a California "Major Donor" Report.

CRP NETWORKS:



[California Republican Party](#) | [Contact Us](#) | [Site Credits](#)

1903 W. Magnolia Blvd., Burbank, CA 91506 · Phone: 818-841-5210 · Fax: 818-841-6668
1201 K. Street #740, Sacramento, CA 95814 · Phone: 916-448-9496 · Fax: 916-448-9497

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FEC Exhibit 10

JOIN THE CALIFORNIA REPUBLICAN PARTY

GOLDEN STATE



LEADERSHIP TEAM

MEMBERSHIP APPLICATION

YES! I WILL JOIN THE GOLDEN STATE LEADERSHIP TEAM AS:

- GOLDEN BEAR (\$10,000)
- LEADERSHIP CIRCLE (\$5,000)
- GOLDEN CIRCLE (\$2,500)
- CHAIRMAN'S COUNCIL (\$1,000)

Don't miss Golden State Leadership Team Convention benefits on back!!

NAME _____

ADDRESS _____

CITY _____ ZIP _____

HOME PHONE _____ BUSINESS PHONE _____

CELL PHONE _____ FAX _____

EMAIL _____

OCCUPATION _____ EMPLOYER _____

MEMBERSHIP APPLICATION PAYMENT INFORMATION

ENCLOSED IS A CHECK MADE PAYABLE TO THE CRP FOR
\$ _____

PAYMENT BY CREDIT CARD

AMEX VISA MASTERCARD

CREDIT CARD NUMBER _____

EXPIRATION DATE _____

IS THIS A CORPORATE CARD? YES NO

CORPORATION NAME: _____

IF THIS IS A CORPORATE CARD, BY LAW IT WILL BE CONSIDERED A CORPORATE DONATION

NAME AS IT APPEARS ON THE CARD _____

BILLING ADDRESS (IF DIFFERENT) _____

AUTHORIZED SIGNATURE _____

(MUST BE THE SAME AS ON THE CARD)

IF CREDIT CARD PAYMENT IS DRAWN ON A JOINT CREDIT CARD, PLEASE INDICATE WHETHER IT IS ATTRIBUTABLE TO:

HUSBAND WIFE BOTH

**IF YOU ARE INTERESTED IN BECOMING A MEMBER OF THE GOLDEN STATE LEADERSHIP TEAM
PLEASE CONTACT ANNE SARO AT 619-787-7187 OR ASARO@CAGOP.ORG**

JOIN THE CALIFORNIA REPUBLICAN PARTY

GOLDEN STATE



LEADERSHIP TEAM

MEMBERSHIP LEVELS

CHAIRMAN'S COUNCIL

\$1,000 ANNUAL COMMITMENT

- GOLDEN STATE LEADERSHIP TEAM LAPEL PIN
- QUARTERLY CRP UPDATE CONFERENCE CALL
- INVITATION TO REGIONAL CRP CAMPAIGN BRIEFING
- **SPECIAL REDUCED TICKET PRICES FOR CRP CONVENTION VIP EVENTS**

Convention Benefits!!

GOLDEN CIRCLE

\$2,500 ANNUAL COMMITMENT

- INVITATION TO CRP CAMPAIGN BRIEFING CONFERENCE CALLS
- **SPECIAL RECOGNITION AT CRP CONVENTIONS**
- **ACCESS TO GOLDEN STATE LEADERSHIP TEAM SUITE AT CRP CONVENTIONS**
- **ONE COMPLIMENTARY TICKET TO VIP RECEPTIONS AT CRP CONVENTIONS**
- **ONE COMPLIMENTARY TICKETS TO MEAL FUNCTIONS AT CRP CONVENTIONS**
- QUARTERLY CRP UPDATE CONFERENCE CALL
- INVITATION TO CAPITOL CAUCUS DAY IN SACRAMENTO FEATURING RECEPTION WITH KEY DECISION MAKERS AND POLITICAL LEADERS
- PLUS ALL CHAIRMAN'S COUNCIL BENEFITS

LEADERSHIP CIRCLE

\$5,000 ANNUAL COMMITMENT

- INVITATION TO VIP RECEPTIONS AT ALL REGIONAL AND STATEWIDE CRP EVENTS
- INTIMATE BUSINESS ROUNDTABLE EVENTS WITH REPUBLICAN CALIFORNIA LEGISLATORS
- **SPECIAL RECOGNITION AT CRP CONVENTIONS**
- **ACCESS TO GOLDEN STATE LEADERSHIP TEAM SUITE AT CRP CONVENTIONS**
- **TWO TICKETS TO VIP RECEPTIONS AT CRP CONVENTIONS**
- **TWO TICKETS TO MEAL FUNCTIONS AT CRP CONVENTIONS**
- PLUS ALL GOLDEN CIRCLE AND CHAIRMAN'S COUNCIL BENEFITS

GOLDEN BEAR

\$10,000 ANNUAL COMMITMENT

- EXTENDED INVITATION TO THE CRP ANNUAL LEADERSHIP CONFERENCE
- **COMPLIMENTARY ACCOMODATIONS AT CRP CONVENTIONS**
- INVITATIONS TO MAJOR DONORS EVENTS THROUGHOUT THE STATE
- VIP ACCOMODATIONS AT CRP SPONSORED POLITICAL RALLIES AND TOWN HALLS
- PLUS ALL CHAIRMAN'S COUNCIL, GOLDEN CIRCLE AND LEADERSHIP CIRCLE BENEFITS

Contributions to the California Republican Party are non-tax deductible for Federal or California tax purposes. Corporate contributions will be used in California state elections. These contributions may be made in any amount. Individual contributions will be used in both federal and California state elections and may also be made in any amount. Contributions to the state committee are unlimited, and may be allocated as follows: up to \$32,400 per calendar year for direct state candidate support, with amounts in excess used for permissible non-direct candidate support purposes. Such contributions may also be used for federal Levin account purposes, up to \$10,000 per individual, corporate or PAC donor. Federal and California law requires political committees to report the name, mailing address, occupation and employer for each donor whose contributions aggregate \$100 or more per calendar year. Any contributor making \$10,000 or more in combined contributions in a calendar year to state or local political party committees, including the CRP; candidates; PACs; and/or ballot measure committees must file a California "Major Donor" Report.

FEC Exhibit 11



Sign up for Email Updates

Email Address



- HOME
- VOTER INFORMATION
- GET INVOLVED
- JOIN A SUPPORTER CLUB
- UPCOMING EVENTS
- YOUR REPUBLICAN PARTY
- CONTACT US

JOIN A REPUBLICAN SUPPORTER CLUB OR RENEW YOUR MEMBERSHIP

The members of our supporter clubs provide the important financial support to fund the Republican campaign in San Diego County. By joining or renewing your supporter club membership today, you will be an important member of the team for the 2008 campaign in supporting our Republican candidates. Thank you for helping to put Republican ideas into action in San Diego County by joining one of our supporter clubs today!

Tony Krvaric, Chairman

(If you would like to donate via check, please fill-out and mail our printable PDF form.)

Required fields have an asterisk ()

Title

* First Name

* Last Name

Middle Initial

* Address

Address (cont.)

* City

* State

* Zip/Postal Code

* Phone

* Email Address

We are required by law to ask for the following information:

* Occupation
If not applicable, please enter N/A.

* Employer

Select your supporter club level:

Chairman's Pinnacle

Annual Membership: \$5,000.

Join the Chairman's Pinnacle



Annual Membership: \$1,000. Established in 1996 during the Republican National Convention, Chairman's Circle members enjoy an array of benefits and elite status in the Republican Party of San Diego County.

Join the Chairman's Circle

» More information

For our most generous supporters, Chairman's Circle members are invited to private, complimentary VIP meetings and events with major Republican leaders and candidates, providing an opportunity to discuss issues and exchange ideas. Insider's Report: regular confidential updates on the party's progress in achieving its political plan directly from the

ACTION CENTER

Join a Supporter Club

Attend a Republican Event

Register To Vote
Vote From Home

Volunteer for the
Republican campaign

Sign up for e-mail updates

Learn more about your
Republican Party

Read Our Blog



Chairman, plus additional briefings on political policy and political developments in the state, county and nation.



Annual Membership: \$250. The Reagan Club is dedicated to advancing the principles of President Ronald Reagan by supporting the recruitment and election of quality Republican candidates.

Join the Reagan Club

» [More information](#)

Reagan Club members enjoy complimentary events that have recently included a private tour of the Ronald Reagan Presidential Library in Simi Valley, and the U.S.S. Midway in San Diego. Reagan Club members also enjoy reduced ticket prices at major Republican Party events throughout the year, and complimentary membership in our Century Club.



Annual Membership: \$100. Established in 1995, the Century Club provides members with the opportunity to meet Republican leaders at complimentary events held prior to our party's regularly monthly meetings and presentation. Members also receive reduced ticket prices for select party events.

Join the Century Club

» [More information](#)

Supporter

Annual Membership: \$50. Supporters receive the benefits of Associate membership, plus one complimentary event each year.

Become a Supporter

Associate

Annual Membership: \$35. The Party's basic membership package includes invitations to monthly party meetings featuring Republican speakers, and a complimentary newsletter.

Become an Associate

If you are an elected official, please enter your title and jurisdiction.

Title

Jurisdiction

Credit Card Information:

* Total Amount of Donation

* Card Type:

VISA
 MasterCard
 AMEX

* Credit Card Number:

(No dashes or slashes)

* Expiration Date:

 /

Submit Donor Club Order / Donation

Note: Contributions to the Republican Party of San Diego County are not tax deductible. Federal and California law require political committees to report the name, mailing address, occupation and employer for each individual whose contributions aggregate \$100 or more per calendar year. Corporate contributions may be used either for federal elections (Levin) or California state elections, and may also be made in any amount. The first \$10,000 received per individual per calendar year maybe used for federal elections. Paid for by the Republican Party of San Diego County.

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FEC Exhibit 12



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UPCOMING EVENTS

YOUR REPUBLICAN PARTY

CONTACT US

JOIN A REPUBLICAN SUPPORTER CLUB OR RENEW YOUR MEMBERSHIP



The Republican Party of San Diego County rewards its most generous supporters with membership in the Chairman's Circle.

TONY KRVARIC, CHAIRMAN'S CIRCLE CHAIR



Tony Krvaric serves as the Chair of the Chairman's Circle.

Born and raised in Sweden, he was inspired by President Ronald Reagan to come to America. Though only a youth, he vowed to one day become an American and pursue his American Dream. The first step was to start his own business, and in 1992 when the opportunity presented itself, he moved to San Diego.

After becoming a naturalized citizen in June of 2003, he decided to become politically involved. Having seen, first hand, the devastating effects of socialism in Sweden and the rest of Europe, he was determined to stand up for the traditional, conservative values that helped make American great.

Today Tony works as a full-service financial consultant for individuals and families who share his values - helping them grow, preserve and distribute their wealth. He lives in the Scripps Ranch area of San Diego with his wife and four children.

Back to Join a Republican Club or Renew Your Membership page

Established in 1996 during the Republican National Convention, the Chairman's Circle members enjoy an array of benefits and elite status in the Republican Party of San Diego County. Member benefits include:

Private VIP events with Republican leaders in small settings, providing excellent opportunities to discuss issues and share ideas. Chairman's Circle members have recently met privately with former Virginia governor and RNC Chairman Jim Gilmore, Senator George Allen, former Reagan Attorney General Edwin Meese, former New Zealand Member of Parliament Maurice McTigue, Congressman Darrell Issa, and Club for Growth President Steve Moore. Chairman's Circle members have also participated in numerous exclusive VIP trips to our nation's capital, including a special trip for President Bush's 2005 inauguration.

- Special recognition in printed materials, at events, on invitations, and other venues.
- Automatic membership in the Party's Reagan and Century Clubs.
- Complimentary or reduced admission to Republican Party of San Diego County events.
- Confidential "Insider's Report" with information on Republican campaigns and programs not available to the public.
- Public opinion research and campaign updates from Public Opinion Strategies and other firms for an inside look at how Republican campaigns are doing.
- Republican Political Report newsletter subscription.

Membership in the Chairman's Circle is an excellent way to demonstrate your support of the Republican team while also enjoying the special recognition that comes from being a generous supporter of the Republican Party of San Diego County.

Annual Contribution: \$1,000

Contact **Chairman's Circle Chair Tony Krvaric** for more information

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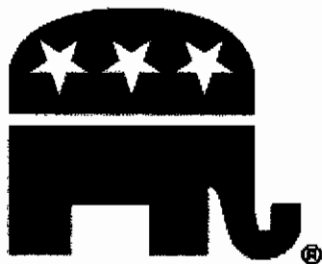

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FEC Exhibit 13



SAVE THE DATE!

Please plan to join us for the

2008

McCain Victory Gala

May 15, 2008

Washington, DC

Honoring Presumptive Nominee

Senator John McCain

Andrew W. Mellon Auditorium
1301 Constitution Avenue, NW
Washington, DC 20240

For additional information, please call the RNC at [REDACTED]

More detailed information to follow...

Paid for by the Republican National Committee and authorized by John McCain 2008.
310 First St., SE, Washington, D.C. 20003

Funds received in response to this solicitation will be subject to federal contribution limits. Federal election law requires us to report the following information*:

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 EMPLOYER* _____

PLEASE CHECK IF SELF-EMPLOYED*

YOU MAY MAKE YOUR 2008 CONTRIBUTION BY CREDIT CARD IF YOU CHOOSE BY COMPLETING THE INFORMATION BELOW.

(Note: Credit card ~~must~~ be personal, not corporate. Please list separate credit cards for each person.)

Type of credit card:

Visa MasterCard American Express Discover

CREDIT CARD NUMBER _____
 EXPIRATION DATE _____
 NAME AS IT APPEARS ON CARD _____
 SIGNATURE _____
 AMOUNT OF GIFT \$ _____

Type of credit card:

Visa MasterCard American Express Discover

CREDIT CARD NUMBER _____
 EXPIRATION DATE _____
 NAME AS IT APPEARS ON CARD _____
 SIGNATURE _____
 AMOUNT OF GIFT \$ _____

**Regents RSVP
2008 Spring Gala**

For questions on your membership, Heather Godwin of the Regents staff can be reached at [redacted]. Space is limited, please respond at your earliest convenience.

Yes, I would like to attend the photo-op and dinner. I will renew my **Regents** membership for 2008 and make a contribution to McCain Victory 2008 and GELAC (\$33,100 from the member and \$33,100 from his/her spouse or colleague for a total of \$66,200).

Yes, I would like to attend the photo-op and dinner but have already contributed the maximum amount to McCain Victory 2008. I will renew my **Regents** membership for 2008 and make a contribution to GELAC (\$30,800 from the member and \$30,800 from his/her spouse or colleague for a total of \$61,600).

Yes, I would like to attend the photo-op and dinner but have already contributed the maximum amount to McCain Victory 2008 and GELAC. I will renew my **Regents** membership for 2008 (\$28,500 from the member and \$28,500 from his/her spouse or colleague for a total of \$57,000).

Yes, I would like to attend the photo-op and dinner. I have already contributed the maximum amount to the RNC for 2008, but will contribute to McCain Victory 2008 and GELAC (\$2,300 for McCain Victory 2008 and \$2,300 for GELAC from the member and \$2,300 for McCain Victory 2008 and \$2,300 for GELAC from his/her spouse or colleague for a total of \$9,200).

Yes, I would like to attend the photo-op and dinner. I have already contributed the maximum amount for 2008.

No, I am unable to attend the photo-op and dinner. I have enclosed my contribution of \$ _____ in accordance with the enclosed regulations.

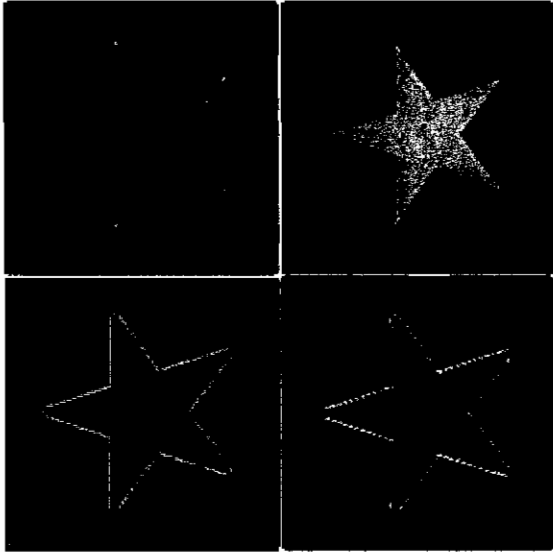
In order to comply with FEC guidelines, please enclose:

- Two separate checks (one from each person) for the amount of \$33,100, \$30,800, \$28,500, \$4,600 or \$2,300 made payable to McCain Victory 2008 or one check from a joint account with both persons names and signatures for the amount of \$66,200, \$57,000, \$9,200 or \$4,600. **Or,**
- Two separate credit cards (one from each person) for \$33,100, \$30,800, \$28,500, \$4,600 or \$2,300.

PLEASE MAKE CHECKS PAYABLE TO MCCAIN VICTORY 2008

Please fax your contribution form to [redacted].
Please call for an Express Shipping account number for mailed contributions.

Republican National Committee
 ATTN: 2008 Spring Gala, Third Floor
 310 First Street, SE
 Washington, DC 20003



Contributions to McCain Victory 2008 are not deductible as charitable contributions for federal income-tax purposes. McCain Victory 2008 allocates contributions to John McCain 2008, John McCain 2008 General Election Compliance Fund, the Republican National Committee, and state parties' federal accounts in compliance with federal limits. Unless a contribution would exceed federal limits or a contributor designates otherwise, McCain Victory 2008 will divide contributions as follows:

- For Individuals—The first \$2,300 to JM 2008, the next \$2,300 to the Compliance Fund, the next \$28,500 to the RNC, and the balance of up to \$37,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.
- For Couples—The first \$4,600 to JM 2008, the next \$4,600 to the Compliance Fund, the next \$57,000 to the RNC, and the balance of up to \$74,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.
- For Federal Multicandidate PACs—The first \$5,000 to JM 2008, the next \$5,000 to the Compliance Fund, the next \$15,000 to the RNC, and the balance of up to \$20,000 will be divided evenly between the Colorado, Minnesota, New Mexico, and Wisconsin state parties' federal accounts.

Contributions to the Compliance Fund will be used solely for legal and accounting services to ensure compliance with federal law and not for campaign activities. Compliance funds may defray a portion of broadcast advertising, national and state office "overhead", and computer/website expenses. Contributions from corporations, labor unions, federal contractors, and foreign nationals without permanent residency status to McCain Victory 2008 are prohibited. *Federal law requires us to report the name, address, occupation, and employer of any contributor who gives more than \$200 in an election cycle (for JM 2008 and Compliance Fund contributions) or more than \$200 in a calendar year (for RNC and state-party contributions).

TEAM 100 RSVP
2008 Spring Gala

For questions on your membership, Kevin Niehaus of the TEAM 100 staff can be reached at [REDACTED]. Space is limited; please respond at your earliest convenience.

- Yes**, I would like to attend the dinner. I will renew my **TEAM 100** membership for 2008 and make a contribution to McCain Victory 2008 and GELAC for \$33,100.
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to McCain Victory 2008. I will renew my **TEAM 100** membership for 2008 and make a contribution to GELAC for \$30,800.
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to McCain Victory 2008 and GELAC. I will renew my **TEAM 100** membership for 2008 for \$28,500.
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to the RNC for 2008, but will contribute to McCain Victory 2008 and GELAC (\$2,300 for McCain Victory 2008 and \$2,300 for GELAC for a total of \$4,600).
- Yes**, I would like to attend the dinner but have already contributed the maximum amount to the RNC for 2008 and to McCain Victory 2008. I will contribute to GELAC for a total of \$2,300.
- Yes**, I would like to attend the dinner. I have already contributed the maximum amount for 2008.
- No**, I am unable to attend the dinner. I have enclosed my contribution of \$_____ in accordance with the enclosed regulations.

Funds received in response to this solicitation will be subject to federal contribution limits. Federal election law requires us to report the following information*:

NAME* _____ DOB _____ SS# _____
 GUEST* _____ DOB _____ SS# _____
 ADDRESS* _____
 CITY* _____ STATE* _____ ZIP* _____
 MAIN CONTACT NUMBER _____ WORK NUMBER _____
 HOME NUMBER _____ CELL NUMBER _____
 FAX NUMBER _____ EMAIL ADDRESS (H) _____
 EMAIL ADDRESS (W) _____
 OCCUPATION* _____
 EMPLOYER* _____

PLEASE CHECK IF SELF-EMPLOYED*.

YOU MAY MAKE YOUR 2008 CONTRIBUTION BY CREDIT CARD IF YOU CHOOSE BY COMPLETING THE INFORMATION BELOW.
 (Note: Credit card **must** be personal, not corporate.)

Type of credit card:

Visa MasterCard American Express Discover

CREDIT CARD NUMBER _____

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NAME AS IT APPEARS ON CARD _____

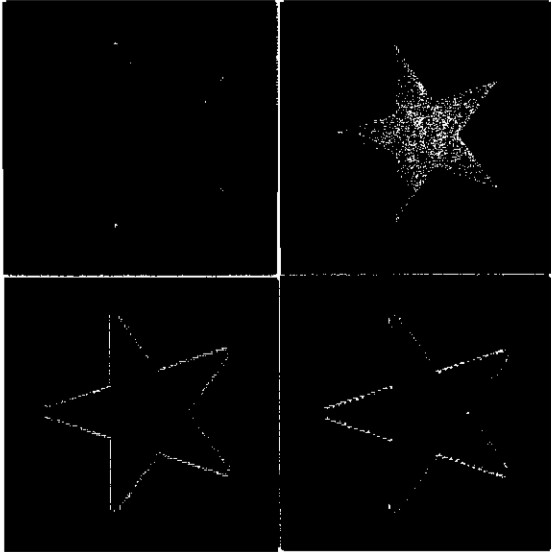
SIGNATURE _____

AMOUNT OF GIFT \$ _____

PLEASE MAKE CHECKS PAYABLE TO MCCAIN VICTORY 2008

Please fax your contribution form to [REDACTED].
 Please call for an Express Shipping account number for mailed contributions.

Republican National Committee
 ATTN: 2008 Spring Gala, Third Floor
 310 First Street, SE
 Washington, DC 20003

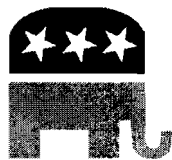


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FEC Exhibit 14



Elect Our Republican Team

- ✓ Working to Fix the Economy and Create Jobs
- ✓ Fighting for Lower Taxes
- ✓ Ending our Dependence on Foreign Oil



John McCain
President



Sarah Palin
Vice President



Elton Gallegly
24th Congressional District



Tony Strickland
19th Senate District



Sam Blakeslee
33rd Assembly District



Greg Gandrud
35th Assembly District



Audra Strickland
37th Assembly District



Cameron Smyth
38th Assembly District



Mark Bernsley
41st Assembly District

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Sun, Mar 8, 2009

In Case You Missed It

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California GOP Chair: Go Local Politico

Posted: Monday, December 8, 2008

By Ron Nehring
December 7, 2008

Building the stronger Republican Party America needs in the next decade will require reshaping how we organize and communicate to make the Republican Party personal to millions of Americans who today are not connected to us but should be.



We start with a strong foundation in our principles of protecting individual liberty and freedom, limited government, lower taxes, promoting personal responsibility, and a strong national defense. Exit polling from November shows our country is still a center-right one, with Republicans closer to where the American people are philosophically than our opponents are.

Yet improvements must be made in how we build on that foundation to win the confidence of the American people in 2009, 2010 and beyond.

First and foremost is credibility. Without it, we're not even in the game. This means if we're campaigning as the team that's for reforming and limiting government, and doing so in an ethical manner, that's what we have to do once elected.

Next, we must do a better job translating our principles into issues and messages that truly connect with people - normal people such as those who don't know and don't care about the difference between the DOL and the DOE. This means communicating in ways that tap into the personal values that drive individual decision making, including in communities where our candidates have come up short. It's not just the features of our policies that matter; it's the benefits those policies can provide to real people and connecting those benefits to the values people hold most dear.

This is especially true of issues that affect Americans in urban and suburban regions. Democratic gains in traditionally Republican regions such as Long Island, the Philadelphia suburbs, Northern Virginia, outer portions of the San Francisco Bay Area and similar regions around the nation should be taken as an opportunity to seriously rethink how our candidates approach urban and suburban issues. This is not a regional phenomenon - it's a national one requiring national attention.

We have witnessed the development of a national, inverse relationship between population density and Republican performance that must be reversed.

It's time to get players such as Jack Kemp, Rudy Giuliani and Stephen Goldsmith back out on the field with new urban and suburban Republican leaders such as San Diego Mayor Jerry Sanders, Los Angeles Supervisor Mike Antonovich and new Fresno Mayor Ashley Swearengin to develop winning governing agendas not just for battleground states, but battleground counties and cities.

The work of Newt Gingrich's American Solutions group, much of which we incorporated into our California Republican Party platform, can be very useful here.

Learning to fight and win in suburban and urban areas is key to our future, and that starts with local and state races in 2009 and 2010.

Working side by side with local and state legislative candidates fighting in these regions can help us further refine the strategies and tactics for our target congressional candidates in 2010 and 2012.

There's another benefit to making a strategic commitment to local and state candidates: It helps us diversify our party without compromising our principles. When I was the Republican leader in San Diego County, we dramatically increased our emphasis on winning local, so-called "nonpartisan" offices. In the process, we expanded the number of women, Latino, African-American and Asian-American Republicans in office with party support. These leaders in turn serve as examples in their communities that yes, one can be a Republican of an ethnic background and win public office, with the support of the party.

We must directly challenge the stereotype that still exists in many areas that if you're of an ethnic background and want to serve in public office, your only path lies with the Democratic Party.

Making progress in state and local government as a necessary precursor to national progress will be easier if the Republican National Committee, the California Republican Party and the Republican Party of San Diego County are successful in their challenge to McCain-Feingold's federal restrictions on how our national and state parties can help state and local candidates in *RNC et al. v. FEC*. A favorable ruling will help the Republican Party provide the support for nonfederal candidates that organized labor continues to gleefully provide for the Democrats at every election.

Finally, the methods by which our candidates connect with people need another upgrade. Call it Voter Contact 3.0. For example, too many are spending too much time on their mail and yard sign strategies and not enough on their SMS and Facebook strategies. When almost half of newly registered voters say they'll go online for information on how to vote, we need to be there as well as provide new tools to involve them in our party and campaigns.

Fortune lies at the crossroads of preparation and opportunity. The opportunity for Republican gains are already there, now it's up to us to roll up our sleeves and prepare by making the Republican Party personal to voters' lives and communities in ways that millions have never before seen.

Ron Nehring is the chairman of the California Republican Party.

...

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###

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FEC Exhibit 16



9/1/04 San Diego Union-Trib. A7
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September 1, 2004

Section: NEWS

FOR GOP . CALIFORNIA DREAMIN'?

Philip J. LaVelle, STAFF WRITER

NEW YORK -- If you expect to see this headline -- "BUSH TAKES CALIFORNIA" -- you are:

A: On drugs.

B: Out of touch with reality.

C: A hopeless optimist.

Republicans might choose the latter, while one Democratic strategist picks "A." Certainly the idea is somewhat fanciful, with most political analysts putting this hypothetical headline up there with "DEWEY DEFEATS TRUMAN."

Still, some speakers at yesterday's California delegation breakfast said Bush will benefit from the reflected popularity of convention speakers Arnold Schwarzenegger, John McCain and Rudy Giuliani.

But whether their popularity is transferable is a question mark as tall as Half Dome: Polls show a double-digit California lead for Democratic nominee John Kerry, the Bush campaign is spending virtually no money in California, and Schwarzenegger so far has devoted little stump time to Bush.

Some kept hope alive, though.

Agriculture Secretary Ann M. Veneman has "absolute hope that we can pull off a surprise . . . I think that California is in play."

Virginia Sen. George Allen: "People say California is tough this year. Yes, it is." But he called California "winnable."

In an interview, Duf Sundheim, chairman of the California Republican Party, acknowledged a Bush victory in California may be "a tall order" but said Republican

registration gains are creating a Bush-friendly environment. "We're inching up."

To Bob Mulholland, chief strategist of the California Democratic Party, it's time for drug tests.

"The Republicans are on drugs again. Hallucinogens," Mulholland said, noting Republicans have inaccurately predicted California victory in the past three presidential elections.

The money flow, he added, shows Bush sees California as a lost cause.

"They're not even polling in California," he said. "They're only polling in 18 battleground states. . . . Bush has not spent a dime on a television ad in California."

o o o

Platform? What platform?

While convention planners roll out politically moderate speakers like Schwarzenegger, delegates on Monday approved a platform strongly in sync with social-conservative orthodoxy, including opposition to abortion and support for a constitutional amendment banning same-sex marriage.

So how do Republicans square the platform with their quest to attract moderate voters?

Former California Gov. Pete Wilson: "Well, very easily. It's not a new phenomenon that the platform and individual candidates often don't perfectly coincide. As a candidate and as an officeholder, you have the right -- in fact the obligation -- to make very clear where you stand on the issues. You don't have an obligation to agree with the platform."

Wilson knows: His support of abortion rights got him blocked from the convention microphone at the GOP convention in San Diego in 1996.

Gerald Parsky, chairman of the Bush-Cheney California campaign: "It should be clear that we Republicans don't agree on every single issue, but that's healthy. If we agree on 80 or 85 percent of the issues, that's a positive."

Tommy Thompson, secretary of Health and Human Services, said terrorism trumps domestic disagreements: "That's what this convention is pretty much about."

Democrats call the platform "extreme" and have dubbed the convention the "Masquerade Ball."

In an opinion piece in USA Today yesterday, filmmaker Michael Moore asserted that "most Americans are much more liberal than the delegates gathered in New York. The

Republicans know it. That's why this week we're seeing gay-loving Rudy Giuliani, gun-hating Michael Bloomberg and abortion-rights advocate Arnold Schwarzenegger."

----- INDEX REFERENCES -----

NEWS SUBJECT: (Government (1G080); Political Parties (1P073); Public Affairs (1PU31))

INDUSTRY: (Entertainment (1EN08); Celebrities (1CE65))

REGION: (USA (1US73); Americas (1AM92); North America (1NO39); New York (1NE72); California (1CA98))

Language: EN

OTHER INDEXING: (BALL; BUSH; BUSH CHENEY CALIFORNIA; C; DEMOCRATIC; GOP; HEALTH; HUMAN SERVICES) (Agriculture; Ann M. Veneman; Arnold Schwarzenegger; Bob Mulholland; Democrats; Duf Sundheim; George Allen; Gerald Parsky; John Kerry; John McCain; Michael Bloomberg; Michael Moore; Mulholland; Pete Wilson; Republicans; Rudy Giuliani; Schwarzenegger; Tommy Thompson; Virginia Sen; Wilson)

KEYWORDS: CALIFORNIA; ELECTIONS

EDITION: 1,2,6,7

Word Count: 709

9/1/04 SDUT A7

END OF DOCUMENT

FEC Exhibit 17

1 The deposition of THOMAS J. JOSEFIAK was held
2 on Tuesday, October 15, 2002, commencing at 8:30 A.M.,
3 at the Law Offices of Covington & Burling, 1201
4 Pennsylvania Avenue, N.W., Washington, D.C. 20044
5 before Margary Rogers, a Notary Public.

6

7 ALSO PRESENT: Jerrod C. Patterson [not admitted]

8 REPORTED BY: Margary Rogers

9

10

11 A P P E A R A N C E S

12 ON BEHALF OF THOMAS J. JOSEFIAK:

13 BOBBY R. BURCHFIELD, ESQUIRE

14 Covington & Burling

15 1201 Pennsylvania Avenue, N.W.

16 Washington, D.C. 20044

17 (202) 662-5350

18

19

20

21

22

1 ON BEHALF OF THE UNITED STATES:

2 TERRY M. HENRY, ESQUIRE

3 U.S. Department of Justice

4 P.O. Box 883

5 Washington, D.C. 20044

6 (202) 514-4107

7

8 ON BEHALF OF THE INTERVENORS:

9 MICHAEL D. LEFFEL, ESQUIRE

10 Wilmer, Cutler & Pickering

11 2445 M. Street, N.W.

12 Washington, D.C. 20037

13 (202) 663-6784

14

15

16

17

18

19

20

21

22

1 PROCEEDINGS

2 -----

3 Whereupon --

4 THOMAS J. JOSEFIK,

5 called as a witness, having been first duly affirmed to

6 tell the truth, the whole truth, and nothing but the

7 truth, was examined and testified as follows:

8 EXAMINATION

9 BY MR. LEFFEL:

10 Q Good morning.

11 A Good morning.

12 Q As you know by now, I'm Michael Leffel

13 with Wilmer, Cutler & Pickering representing the

14 defendant Intervenors. I want to say that we will

15 not be here exceptionally long today; so hopefully

16 that will be good news for everyone.

17 Before you is your declaration.

18 (Josefiak Cross Deposition Exhibit

19 Number 1 was marked for purposes of identification.)

20 Q Have you had a chance --

21 MR. BURCHFIELD: Just to note that the

22 declaration which you marked as Josefiak

1 where the FEC, for federal election purposes, used
2 subordinate committees of state parties as
3 affiliated and therefore subject to one limit.

4 There are rules of how you can prove you
5 are not affiliated, and the Iowa folks came in, in
6 1979 and obtained an advisory opinion from the
7 Federal Election Commission saying they were
8 affiliated with the state party, therefore they had
9 their own contribution limits.

10 Some of these county committees are, in
11 fact, federal committees; other are not. Dallas
12 County Committee, my understanding, is not. And
13 it's based on my conversations with their counsel
14 who used to be counsel of the Iowa State Party,
15 Ralph Brown.

16 Q Okay. Let's go to Paragraph 29.

17 With respect to planning for the Victory
18 Plan, you state that "The RNC's field personnel were
19 often consulted by the state parties at this stage
20 of the planning process."

21 How do you know that?

22 A My own involvement with our own field

1 staff, because they were constantly calling me
2 asking for advice as to what the provisions were
3 with absentee ballot programs and the non-allocable
4 volunteer mail and the slate card provision.

5 And so that all of these efforts were
6 being included at a plan initial stages and they
7 were seeking advice as whether or not how all of
8 this financially had to be handled.

9 Q So the RNC field staff would call you
10 and say we are getting questions from the state
11 party as to planning?

12 A Or we are involved with helping them
13 plan and therefore what can they do with regard to
14 the slack. Can they use, for example, RNC
15 transfers, or do they have to raise this on their
16 one. What about the phone calls? Can they do phone
17 calls on behalf of the ticket and that sort of
18 thing.

19 So they were working on the basic
20 elements from voter registration to absentee ballots
21 to the whole get-out-the-vote program using, in some
22 cases, the names of federal candidates; in other

1 cases, a generic get-out-the-vote message and
2 wanting to know what the rules of the game were as
3 coupled with the rules of the game at the state
4 level.

5 Q Let's go to Paragraph 30. You talked
6 about the RNC regional meetings.

7 A Uh-huh.

8 Q Where they met to discuss with each
9 state party the Victory Plans?

10 A Uh-huh.

11 Q You said, "During these meetings, the
12 RNC listened to the needs of the state parties,
13 provided advice where appropriate, and helped revise
14 each of the states' proposals."

15 Is that based on your personal
16 knowledge?

17 A As I said, in 2000 I did sit in on some
18 of them. I didn't sit it on all of them, but that
19 was the format that I understood that was followed
20 not only the ones that I personally attended, which
21 they were, but others. It was following the same
22 format.

1 Q And you know because that's what you
2 were told, the other --

3 A Well, I've observed and based on
4 conversations with folks who had been sitting in
5 those meetings at the time that this is how it
6 operated.

7 Q Let's turn to Paragraph 36. You state
8 in Paragraph 36, "The Missouri Victory 2000 Campaign
9 Plan was designed to accomplish" -- at least one of
10 the objectives were "to produce statewide Republican
11 victories for president, governor, and U.S. Senate."

12 Is that correct?

13 A That's correct.

14 Q So the Victory Plans were in fact
15 designed to help not only state candidates, but also
16 federal candidates?

17 A Yes. Missouri was one of those
18 competitive states that had competitive races across
19 the board at the statewide level. And I believe we
20 also were involved with the legislative races in
21 Missouri as well. But those were definitely three
22 statewide competitive races and that would be the

1 kind of state where you had competitive races at all
2 those levels that would be a prime state for the RNC
3 to be involved in.

4 Q In Paragraph 50 you describe the RNC's
5 funding of the get-out-the-vote program in New
6 Jersey in, I believe, 2001.

7 How did you learn about the details of
8 what the New Jersey Victory Plan actually did in
9 2001?

10 A In New Jersey?

11 Q I believe it's in New Jersey.

12 A I was intimately involved in working on
13 that plan. New Jersey is a state with very, very
14 specific provisions as to what any organization can
15 do, but particularly a national party organization
16 within the state.

17 So right from the very beginning of the
18 process, we were involved with attorneys in the
19 State of New Jersey and working with them to request
20 advisory opinions from the New Jersey election board
21 for them to restate what we done in other elections
22 as to what we could and could not do.

1 We were intimately involved in working
2 with the board to work out the process for the
3 absentee ballot program where we were filling in
4 blanks where it was not clear under New Jersey law
5 that you could do that.

6 And we worked with the board to make
7 sure that what we sending out as applications would
8 meet the qualifications of New Jersey and so they
9 would be viewed as legitimate requests and not be
10 thrown out as not following the law.

11 We were involved with the board in
12 trying to determine what kind of activity we could
13 do up and down the state ticket then for the
14 legislators and the towns and the counties because
15 of the very strict limitations that New Jersey
16 places on contributions to those candidates and also
17 the gubernatorial campaign.

18 So we worked very closely with our
19 lawyers in New Jersey, with the people on the
20 ground, with the state party, with our field staff
21 to make sure that we were doing it according to what
22 New Jersey required, and on top of that, not

1 associated with that was our whole independent
2 expenditure program that we conducted outside of the
3 normal routine, but none of those folks were
4 included in the process.

5 Q Let me ask you this: How do you
6 personally know, for example, that door-to-door
7 hangers were delivered by volunteers organized by
8 the county Republican organizations?

9 A Because we had actually prepared money.
10 We made contributions to the vendors who actually
11 prepared those door hangings for the volunteers to
12 distribute.

13 And if you look at the New Jersey
14 report, you will see multiple contributions made to,
15 I believe, 383 entities in the State of New Jersey
16 from state legislative candidates to county
17 committees to municipalities, all the recipients of
18 that.

19 And the volunteers were organized by
20 them to go out and use all of these things that we
21 provided the funds for to vendors to distribute to
22 those folks to distribute.

1 Q But you weren't standing out in streets
2 watching these people deliver the hangers
3 door-to-door, were you?

4 A No, I was not. But, again, it was the
5 understanding by giving the money to these vendors
6 that's exactly what the money was being used for.

7 Q That was your understanding?

8 A (Witness nodded.) Otherwise, we wouldn't
9 have given the money to the vendors for those
10 programs. I mean, it was -- the idea was the whole
11 part of the get-out-the-vote program in New Jersey.

12 Q Turn to Paragraph 11 of your rebuttal
13 declaration. You state in that sentence that BCRA's
14 various restrictions on national party transfers of
15 non-federal money to state parties and other
16 provisions. "Will severely harm the state parties
17 and jeopardize the viability of several."

18 Correct?

19 A That's correct.

20 Q I take it by including the example of
21 the Republican Party of Wisconsin, you are
22 suggesting that is one of the state parties that may

1 be jeopardized because of BCRA; is that correct?

2 A Yes.

3 Q Do you personally know that the
4 Republican Party of Wisconsin cannot raise
5 additional funds in other ways that would be
6 permitted under BCRA?

7 MR. BURCHFIELD: Object to form, and
8 I'll just have a continuing objection to your use of
9 the term "personal knowledge or personally know,"
10 because I think you're using it in a way that is
11 inconsistent with what the D.C. Circuit has said
12 about senior executives of an organization whether
13 they do have personal knowledge, but he can answer
14 the question.

15 THE WITNESS: My experience with
16 Wisconsin, knowing the Wisconsin restrictions and
17 knowing the requests that have been made over the
18 years by the state party of Wisconsin, knowing the
19 assistance we have given, it is my view that a state
20 like Wisconsin is severely hampered by this.

21 Q So this is your opinion?

22 A It is based on my experience with

1 dealing with Wisconsin. It's difficult enough now
2 for the State of Wisconsin to get the kind of money
3 it needs, and I think that BCRA -- in my opinion,
4 BCRA really makes it much more difficult for a state
5 like Wisconsin to raise the money it needs.

6 Q Do you know that they are having
7 difficulty raising the money right now because of
8 conversations you've had with people affiliated with
9 the Republican Party of Wisconsin?

10 A I am basing on conversations I've had
11 with others based on the fact that the requests that
12 come in from the state party of Wisconsin for
13 assistance is such that without our assistance, they
14 would be severely hampered in getting the money into
15 their accounts for the purposes they need.

16 Q Have you had any conversations with
17 agents of or officials with the Republican Party of
18 Wisconsin about their difficulties in raising funds?

19 A No, I have not. I've had conversations
20 with the agents of the RFC, but not with the agents
21 of the state party itself.

22 Q Okay. And have you had conversations

1 with any of the agents of or officials of the
2 Republican Party of Oregon to discuss their
3 difficulties in raising funds?

4 A No, I have not.

5 Q When a state party in the Victory
6 programs, that you have referred to in your
7 declaration that are held in a federal election
8 year -- that are conducted in a federal election
9 year, conduct voter registration drives, are they
10 designed to register likely Republican voters?

11 A Yes.

12 Q Doesn't that help Republican candidates
13 for federal office?

14 A The hope is, as a lot of these plans
15 refer to it, helps the entire ticket in that state.
16 And whether it's for the legislature or whether it's
17 for governor, whether it's for Congress or the U.S.
18 Senate, if they have any of those races in that
19 particular year, that's the whole purpose behind it
20 and that was really the purpose behind the Federal
21 Election Commission's allocation regulations in the
22 states recognizing based on who was on a ballot in

1 any particular election federal election year.

2 That's how you would allocate resources.

3 There was an acknowledgment that it benefited the

4 entire ticket and how it benefited and what kind of

5 funds were used were based on the categories on

6 those candidates on the ballot.

7 Q So it does help federal candidates?

8 A It does.

9 Q And in these states when the state party

10 conducts a get-out-the-vote activity, are they

11 designed to get out the vote of the likely

12 Republican voters?

13 MR. BURCHFIELD: Are you talking about

14 elections where the federal candidates appeared on

15 the ballot?

16 MR. LEFFEL: Yes, that's what I said in

17 my previous question.

18 THE WITNESS: They are, I believe,

19 intended in the general election to get out likely

20 voters that will vote Republican. In some states

21 they may not be Republican -- it's semantics, but

22 you are basing your get-out-the-vote effort in

1 getting that 50 plus one vote and it may go into
2 areas of not necessarily Republican voters, but
3 independent voters that are going to vote
4 Republican.

5 So there is an recognition that -- your
6 voter registration program obviously is to register
7 Republicans. Your get-out-the-vote program is to
8 get Republicans and independents and maybe
9 disgruntle democrats to vote for your candidate.

10 So it's more than just the Republican
11 base. It's getting the base plus in order to win.

12 Q So it's designed to get people to the
13 polls who you believe will vote Republican?

14 A Correct.

15 Q And, again, doesn't that also help
16 Republican candidates for federal office?

17 A It helps the ticket and Republican
18 candidates, all Republican candidates for office,
19 federal and non-federal.

20 Q In your declaration you talk about
21 certain states that have off-year elections; is that
22 correct?

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A Republican 50-state strategy? Politico

Posted: Thursday, January 29, 2009

By: Ron Nehring
January 27, 2009 04:50 AM EST

Within the Republican National Committee, there has been a great deal of discussion surrounding whether our party needs a 50-state strategy to reassert itself nationally.

It's an important question. The answer: It depends on how one defines a 50-state strategy.

Elections are won and lost on the margins, so if one defines a 50-state strategy as allocating resources equally among 50 states based on population, or some similar formula, the answer would be no. From an Electoral College standpoint, resources will inevitably be allocated first to those states that are on the margin, with an eye toward reaching 270 electoral votes for our team in 2012.

Yet if we define a 50-state strategy to mean that our party makes a national commitment to building the strength of our party in every state, the answer is yes.

The difference is this: In the first model, only a de minimis level of attention is directed at any state where the November 2012 outcome in the presidential election can today be reasonably assumed.

A better approach is to realize that our party has a direct, national interest in ensuring that in every state and congressional district, we have the ability to organize and communicate and perform the basic campaign functions that are vital for any modern political party.

Simply because a state is not likely to be "in play" in the 2012 presidential election does not mean we have no national interest in any congressional, state legislative or local election in that state. In fact, precisely the opposite is true: Building organizational and communications capability - and expanding the ranks of congressional, state and local officials from our party - makes it more likely a state will be competitive in a presidential election down the road.

Of course, election year resources will go to the battleground states. Fine. Yet we have three years and thousands of congressional, state and local elections before then.

A proper 50-state strategy has at its centerpiece the principle that every American should be within reach of an effective state party organization that can communicate, persuade and organize on a large scale. Operationally, this means developing a portfolio of organizational and communications functions that each

state party should be capable of performing, plus a related set of functions for county and district party committees. It should be developed through a working group of state party chairmen, national committee members and campaign experts. While there are differences in each state, and within states, there are certain common functions that any modern political party needs to perform to be competitive.

Turning theory into practice means ascertaining each party's capabilities and developing a program to help each state be prepared for the 2010 midterm elections.

While we build our party in each state, we must concurrently identify targets of opportunity - congressional, state legislative and local seats that are within reach. In every case, we should take the steps necessary to ensure the county and district committees in those communities have the organizational structure and communications capabilities to maximize our opportunity for victory.

The Republican National Committee has built an impressive array of tools in recent years: sophisticated voter files, volunteer databases, methods for distributing online content and more. Every congressional, state and local candidate carrying the Republican banner needs to be dialed in to benefit from these tools. The same is true for our state parties and local party committees. We're not there yet, but if we want to generate a tremendous force multiplier for our candidates at every level, we need to be.

Finally, the structure we build can only be as strong as the message. The electoral landscape is changing, and research is needed to determine how we can best apply our solid principles to today's issues and communicate with greater impact in ways that resonate with voters on the level of the personal values that drive decision making.

For example, our national party was hammered in 2008 in many suburban areas. A national emphasis on determining how we can more effectively compete in these regions should be a given. Yet the 50-state dimension would enter in when we ensure all of our candidates receive the benefit of this research once it's developed.

Should our party concentrate resources in just a few target states or drive organization and communications capability-building across the country? The answer is both.

...

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Leadership Journal

Friday, September 12, 2008

San Joaquin Republicans Organizing for Dean Andal

On Tuesday Vice Chairman Tom Del Beccaro and I spoke to the South San Joaquin Republicans at a packed event highlighting the next Congressman from the 11th district, Dean Andal.

Dean is running a strong campaign for Congress in this highly competitive region of the state, and it's great to see our Republican candidates benefitting from the organization our volunteer groups have built in the region. Dean's campaign represents one of our best opportunities to pick up a congressional seat on the west coast, according to the National Republican Congressional Committee and other expert sources.

Dean is also benefitting from the support of our Republican congressional delegation, whose members are especially pouring it on for Dean, and for Tom McClintock in the nearby fourth Congressional district.

For more information on Dean's campaign, visit DeanAndal.com.

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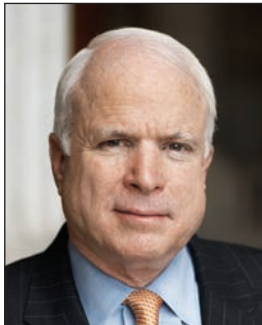


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San Diego City Council District 7



Jan Goldsmith
San Diego City Attorney



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Ralph Denney – 76th State Assembly District
Joel Anderson – 77th State Assembly District
John McCann – 78th State Assembly District
Derrick Roach – 79th State Assembly District

State Senate

Jeff Perwin – 39th State Senate District

Statewide Propositions

Prop. 1A – High Speed Rail Boondoggle – **Vote NO**
Prop. 2 – Unreasonable Animal Rights Mandates – **Vote NO**
Prop. 3 – Expensive Hospital Bond – **Vote NO**
Prop. 4 – **Protect Our Daughters, (Sarah's Law)** – **Vote YES**
Prop. 5 – Weaken Penalties For Drug Crimes – **Vote NO**
Prop. 6 – Safe Neighborhoods (Anti-Gang) Act – **Vote YES**
Prop. 7 – Expensive, Radical Energy Scheme – **Vote NO**
Prop. 8 – Protect Traditional Marriage – **Vote YES**
Prop. 9 – Protect Crime Victims' Rights – **Vote YES**
Prop. 10 – Expensive Alternative Energy Bond – **Vote NO**
Prop. 11 – Redistricting Reform – **No Position**
Prop. 12 – Veterans' Bond Act – **Vote YES**

Countywide and Local Propositions

Prop. A – Countywide Tax Increase – **Vote NO**
Prop. B – San Diego – Bayfront Redevelopment Initiative – **Vote NO**

Prop. C – San Diego – Mission Bay Funding Charter Amendment – **Vote YES**
Prop. H – Del Mar – Hotel Tax Increase – **Vote NO**
Prop. J – El Cajon – Sales Tax Increase – **Vote NO**
Prop. K – Encinitas – Rental Tax Increase – **Vote NO**
Prop. L – La Mesa – Sales Tax Increase – **Vote NO**
Prop. M – National City – Sales Tax Repeal – **Vote YES**
Prop. O – San Marcos – Unreasonable Land Use Amendment – **Vote NO**
Prop. Q – Chula Vista – Proposal to politicize City Attorney – **Vote NO**
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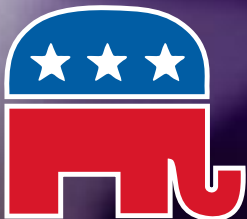
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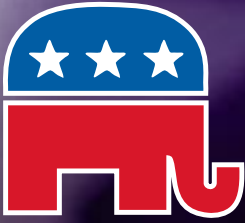
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Carolyn Dorroh

Mail Your Absentee Ballot Today or Vote on Tuesday, November 4th (polls open 7 AM - 8 PM)

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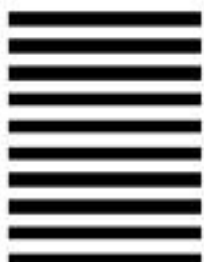


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Precinct
Representative



Republican Party of San Diego County Official Candidates



George W. Bush
for President



Bill Jones
for U.S. Senate



Dick Murphy
for San Diego Mayor

Your Official Republican Team for San Diego County

Dear Fellow Republican,

President Bush and our Republican candidates are working hard for a **strong national defense**, to **win the war on terror**, make **taxes lower**, **improve our schools** with reforms stressing **accountability and high standards**, and promote policies of **personal responsibility**.

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Ron Nehring

Chairman, Republican Party of San Diego County
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Bring this to your polling place on Election Day!

- George W. Bush** - President
- Richard "Dick" Cheney** - Vice-President
- Bill Jones** - U.S. Senate
- Darrell Issa** - U.S. Congress - 49th District
- Randy "Duke" Cunningham** - U.S. Congress - 50th District
- Michael Giorgino** - U.S. Congress - 51st District
- Duncan Hunter** - U.S. Congress - 52nd District
- Darin Hunzeker** - U.S. Congress - 53rd District
- Larry Stirling** - State Senate - 39th District
- George Plescia** - State Assembly - 75th District
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- Joseph Brannigan** - Superior Court Judge
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- Phil Thalheimer** - San Diego City Council District No. 1

Vote on Tuesday, November 2nd
Polls open at 7:00am and Close at 8:00pm

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SAVE VOTER CHOICE!

NO on 62

California Republican Party, 1993 W. Magnolia Boulevard, Burbank, CA 91506.
Major funding provided by Republican National Committee and Alex Spivack.
Not authorized by any committee or committee.

This flawed initiative will eliminate your right to choose the official nominee of the Republican Party in future elections.

**Vote
Republican!**

Republican Party of San Diego County Official Candidates

**Bring this to your polling
place on Election Day!**

Statewide Propositions

Proposition 62 – NO

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Proposition 1A – YES	Proposition 63 – NO	Proposition 69 – YES
Proposition 59 – YES	Proposition 64 – YES	Proposition 70 – NO
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Proposition 61 – NO	Proposition 67 – NO	
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City of San Diego Propositions

E – Yes - <i>Strengthen the ethics Commission</i>	H – Yes - <i>Fix the pension system</i>
F – Yes - <i>Make City Hall accountable</i>	J – No - <i>Fight the tax increase</i>
G – Yes - <i>Fix the pension system</i>	K – Yes - <i>Preserve Mt. Soledad</i>

San Diego

- Mitz Lee - School Board District A
- Luis Acle - School Board District D
- John Cubello - Comm College District B
- Larry Baldwin - Rural Fire
- Doane Glitschka - Rural Fire
- Eric Grant - Rural Fire

Cajon Valley

- Jeff Kover - School Board
- Bill Wells - School Board

Chula Vista

- Patrick Judd - Elementary School Seat 4

Coronado

- Tom Smisek - Mayor
- Ruth Schmidt - City Council
- Philip Monroe - City Council
- Doug Metz - School Board
- Lance Mann - School Board

Del Mar

- Linda Crawford - School Board
- Marshall Merrifield - School Board

Escondido

- Sam Abed - City Council
- Ed Gallo - City Council

Grossmont Healthcare

- Jim Stieringer
- Bob Yarris

Grossmont High School

- Larry Urdahl
- Priscilla Schreiber

Grossmont-Cuyamaca

- Bill Garrett - Comm College Seat NO. 3
- Timothy Caruthers - Comm College Seat NO. 4

Helix

- Chuck Muse - Water District Division NO. 3

La Mesa-Spring Valley

- Bob Duff - School Board

Lakeside

- Twyla Godly - School Board
- Tina Ninteman - School Board

National City

- Fideles Ungab - Council
- George Hood - Treasurer
- Walt Graham - School Board

Otay

- Jaime Bonilla - Water District 2
- Elizabeth Scott - Water District 4
- Mark Robak - Water District 5

Palomar

- Ralph Jensen - Comm College
- Howard Kuiper - Comm College
- Darrell Mc Mullen - Comm College
- Nancy Bassett - Pomerado Health
- Mary Evert - Pomerado Health
- Linda Greer - Pomerado Health

Poway

- Merrilee Boyack - City Council
- Scott Harman - City Council
- Linda Vanderveen - School Board

Ramona

- Chris Anderson - CPA

Carolyn Dorroh – CPA

- Raul Jaquez – CPA
- Luana Stines – CPA
- Angus Tobiason – CPA

Rancho Santa Fe

- Richard Burdge – School Board
- Jim Depolo – School Board
- William Ruh – School Board
- Jim Ashcraft – Fire
- Nancy Hillgren – Fire

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- Larry Jackman - Cons Fire
- Caroline Braun - Cons Fire
- Criss Brainard - Cons Fire

San Pasqual

- Howard Cottam - School Board

Solana Beach

- Scott Gulbransen - School Board

South Bay

- Margaret Welsh - Irrigation Division NO. 5
- Elvia Aguilar - School Board

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- Archie Mc Allister - High School Board

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- Carl Starrett II - CPA
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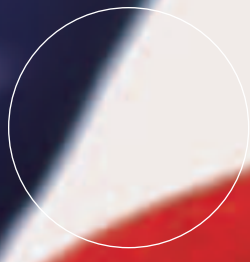
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- Duncan Hunter** - U.S. Congress - 52nd District
- Darin Hunzeker** - U.S. Congress - 53rd District
- Larry Stirling** - State Senate - 39th District
- Ray Haynes** - State Assembly - 66th District
- Jay LaSuer** - State Assembly - 77th District
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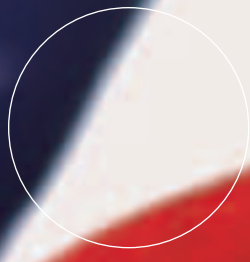
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City: _____ State: _____ ZIP: _____

Phone: _____

E-mail: _____

Flex your political muscle on Election Day! www.SanDiegoRepublicans.org



Vote Republican!

Republican Party of San Diego County Official Candidates

Bring this to your polling place on Election Day!

Alpine

Chuck Taylor - School Board
Mark Price - School Board
Steve Hunyar - School Board
Douglas Benson - CPA
Larry Urdahl - CPA
Mark Price - CPA
Paul Gonya - CPA
Ron Fuller - Fire Protection
Barbara Howell - Fire Protection

Bonsall

Richard Olson - School Board
Sylvia "Grandma" Tucker - School Board

Borrego

Douglas Watters - Water District
Scot Fortiner - Water District

Cajon Valley

Bill Wells - School Board
Jeff Kover - School Board

Campo/Lake Morena

Robert Kreger - CPA
Shirley Perkiss - Driscoll CPA

Chula Vista

Patrick Judd - Elementary School Seat 4

Deer Springs

Frank Asaro - Fire Protection

Dehesa

Kimberly Pike - School Board
Janice Green - School Board

El Cajon

Arkan Somo - City Council
Bob Mc Clellan - City Council
Jillian Hanson-Cox - City Council

Fallbrook

Harry Christiansen - CPA
Dumonte Voigt - CPA
Charles Sanacore - CPA
Mary Jane Pfeil - CPA
Carol Eastman - CPA
Jim Bowen - CPA
Jim Oenning - CPA
Sharon Mullin - Healthcare
Don McDougal - Public Utility Seat No. 3

Grossmont Healthcare

Jim Stieringer
Bob Yarris

Grossmont High School

Larry Urdahl
Priscilla Schreiber

Grossmont-Cuyamaca

Bill Garrett - Comm College Seat No. 3
Timothy Caruthers - Comm College Seat No. 4

Helix

John Linden - Water District 1
Chuck Muse - Water District 3
Richard Smith - Water District 5

Julian

Vicky Bryan - CPA
Betty Birdsell - CPA
Ray Redding - CPA
Peggy Steadham - CPA
Franklin "Woody" Barnes - CPA
Patricia Mushet - CPA

La Mesa

Mary Kennedy - City Clerk
Ruth Sterling - City Council
Dave Allan - City Council
Bob Duff - Spring Valley School Board

Lakeside

Julie Bugbee - CPA
Robin Clegg - CPA
William Colgan - CPA
Patricia Dintrone - CPA
Wyatt Allen Jr. - CPA
Lloyd Dailey - Fire Protection
Fred Daskoski - Fire Protection
Twyla Godley - School Board
Tina Ninteman - School Board

Mountain Empire

Jeff Morrison - Unified Trustee Area No. 2
Trina Ambrose - Unified Trustee Area No. 7

North County

Richard Olson - Fire Protection

Otay

Jaime Bonilla - Water District 2
Elizabeth Scott - Water District 4
Mark Robak - Water District 5

Padre Dam

Howard Kummerman - Municipal Water Division No. 2

Palomar

Ralph Jensen - Comm College
Darrell Mc Mullen - Comm College
Howard Kuiper - Comm College

Mary Evert - Pomerado Health Division

Nancy Bassett - Pomerado Health Division

Linda Greer - Pomerado Health Division

Poway

Linda Vanderveen - School Board

Rainbow

Larry Sundram - Municipal Water Division No. 1

Ramona

Luauna Stines - CPA
Angus Tobiason - CPA
Raul Jaquez - CPA
Carolyn Dorroh - CPA
Chris Anderson - CPA
Joe Cahak - Municipal Water Division No. 5

Riverview

Billie Sangster - Water

San Diego

John Cubello - Comm College District B
Eric Grant - Rural Fire
Larry Baldwin - Rural Fire
Doane Glitschka - Rural Fire
Mitz Lee - School Board District A

San Miguel

Caroline Braun - Fire Board
Larry Jackman - Fire Board
Criss Brainard - Fire Board

Southbay

Margaret Welsh - Irrigation Board #5

Sweetwater

Archie Mc Allister - High School Board

Valle De Oro

Thomas Oakes - CPA
Cheryl Baldivia - CPA
Philip Conard - CPA
John Goodell - CPA
Dan Mitrovich - CPA
Daniel Smith - CPA
Carl Starrett II - CPA
Joel Hyatt - CPA

Valley Center

Elaine Nolan - CPA
Leon Schwartz - CPA
Frank Shoemaker - CPA
Keith Simpson - CPA
Jonathan Vick - CPA

Statewide Propositions

Proposition 62 – NO

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Proposition 1A – YES
Proposition 59 – YES
Proposition 60 – YES
Proposition 60A – YES
Proposition 61 – NO
Proposition 62 – NO
Proposition 63 – NO
Proposition 64 – YES

Proposition 65 – NO
Proposition 66 – NO
Proposition 67 – NO
Proposition 68 – NO
Proposition 69 – YES
Proposition 70 – NO
Proposition 71 – NO
Proposition 72 – NO

Local Propositions

City of San Diego

J – NO Stop the Tax Increase
E – YES
F – YES
G – YES
H – YES
K – YES

City of El Cajon

O – NO

Santee School District

Y – NO

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- Larry Stirling** - State Senate - 39th District
- Mimi Walters** - State Assembly - 73rd District
- Mark Wyland** - State Assembly - 74th District
- Joseph Brannigan** - Superior Court Judge
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Richard Olson - School Board
Sylvia "Grandma" Tucker - School Board

Cardiff

Nancy Orr - School Board
Andy Brown III - School Board

Carlsbad

Tracy Carmichael - City Council
Ann Kulchin - City Council

Deer Springs

Frank Asaro - Fire Protection

Del Mar

Terry Sinnott - City Council
Carl Hilliard - City Council
Kevin Burke - City Council
Marshall Merrifield - School Board
Linda Crawford - School Board

Encinitas

James Bond - City Council
Jerome Stocks - City Council

Escondido

Ed Gallo - City Council
Sam Abed - City Council

Fallbrook

Charles Sanacore - CPA
Jim Bowen - CPA
Harry Christiansen - CPA
Carol Eastman - CPA
Jim Oenning - CPA
Dumonte Voigt - CPA
Mary Jane Pfeil - CPA
Sharon Mullin - Healthcare
Don McDougal - Public Utility Seat NO. 3

Leucadia

Samuel Smalley - Wastewater
Judy Hanson - Wastewater

North County

Richard Olson - Fire Protection

Oceanside

Terry Johnson - Mayor
Barbara Wayne - City Clerk
Vickie Prosser - City Council
Jack Feller - City Council
Rosemary Jones - City Treasurer

Palomar

Howard Kuiper - Comm College
Darrell Mc Mullen - Comm College
Ralph Jensen - Comm College
Linda Greer - Pomerado Health Division
Nancy Bassett - Pomerado Health Division
Mary Evert - Pomerado Health Division

Rainbow

Larry Sundram - Municipal Water Division NO. 1

Rancho Santa Fe

Jim Ashcraft - Fire
Nancy Hillgren - Fire
Richard Burdge - School Board
Jim Depolo - School Board
William Ruh - School Board

San Marcos

Hal Martin - City Council
Lee Thibadeau - City Council
David Horacek - School Board

Solana Beach

Doug Sheres - City Council
Joe Kellejian - City Council
Mark Kersey - City Council
Scott Gulbransen - School Board

Tri-City

Rosemarie Reno - Healthcare
David Tweedy - Healthcare

Valley Center

Elaine Nolan - CPA
Leon Schwartz - CPA
Frank Shoemaker - CPA
Keith Simpson - CPA
Jonathan Vick - CPA

Vista

Nick Ashcraft - City Council
Margaret Morgan - Fire Protection District
Robert Fougner - Fire Protection District
Mike Mc Reynolds - Fire Board
Chris Marsolais - School Board
Stephen Guffanti - School Board
Eileen Fernandez - School Board



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Proposition 67 - NO
Proposition 68 - NO
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Proposition 70 - NO
Proposition 71 - NO
Proposition 72 - NO

Local Propositions

City of San Diego

J - NO Stop the Tax Increase

E - YES
F - YES
G - YES
H - YES
K - YES

City of Del Mar

N - NO

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Seat NO. 3

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Seat NO. 4

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- Howard Cottam - School Board

Solana Beach

- Scott Gulbransen - School Board

South Bay

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Elvia Aguilar - School Board

Sweetwater

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- Cheryl Baldivia - CPA
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Vote on Tuesday, November 2nd

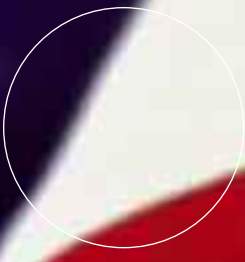
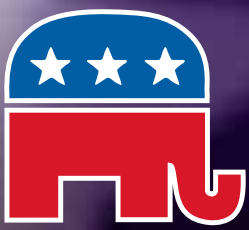
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The Republican Party of San Diego County



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John McCain President



Sarah Palin Vice-President

US CONGRESS

- Darrell Issa – 49th Congressional District
- Brian Bilbray – 50th Congressional District
- David Lee Joy – 51st Congressional District
- Duncan D. Hunter – 52nd Congressional District
- Michael Crimmins – 53rd Congressional District

Your San Diego City Hall Reform Team



April Boling San Diego City Council District 7



Jan Goldsmith San Diego City Attorney



Phil Thalheimer San Diego City Council District 1

State Senate

Jeff Perwin – 39th State Senate District

State Assembly

- Kevin Jeffries – 66th State Assembly District
- Diane Harkey – 73rd State Assembly District
- Martin Garrick – 74th State Assembly District
- Nathan Fletcher – 75th State Assembly District
- Ralph Denney – 76th State Assembly District
- Joel Anderson – 77th State Assembly District
- John McCann – 78th State Assembly District
- Derrick Roach – 79th State Assembly District

Statewide Propositions

- Prop. 2 – Unreasonable Animal Rights Bill – **Vote NO**
- Prop. 4 – Sarah's Law, Protecting Our Daughters – **Vote YES**
- Prop. 6 – Safe Neighborhoods Act – **Vote YES**
- Prop. 7 – Radical Solar Energy Mandates – **Vote NO**
- Prop. 8 – Traditional Marriage – **Vote YES**

- Prop. A – Countywide Tax Increase – **Vote NO**
- Prop. B – San Diego – Bayfront Redevelopment Initiative – **Vote NO**
- Prop. C – San Diego – Mission Bay Funding Charter Amendment – **Vote YES**
- Prop. H – Del Mar – Hotel Tax Increase – **Vote NO**
- Prop. J – El Cajon – Sales Tax Increase – **Vote NO**
- Prop. K – Encinitas – Rental Tax Increase – **Vote NO**
- Prop. L – La Mesa – Sales Tax Increase – **Vote NO**
- Prop. M – National City – Sales Tax Repeal – **Vote YES**
- Prop. O – San Marcos – Unreasonable Land Use Amendment – **Vote NO**
- Prop. R – Bond Measure – **Vote NO**
- Prop. S – Bond Measure – **Vote NO**
- Prop. T – Bond Measure – **Vote NO**
- Prop. U – Bond Measure – **Vote NO**
- Prop. V – Bond Measure – **Vote NO**
- Prop. W – Bond Measure – **Vote NO**
- Prop. X – Bond Measure – **Vote NO**

Visit www.SanDiegoRepublicans.org for the latest updates on candidates and measures

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Help Ensure Republican Victories in '08. Volunteer Today!

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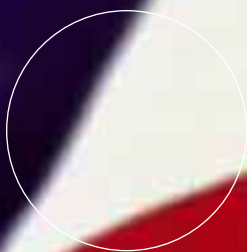
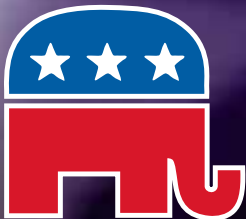
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The Republican Party of San Diego County



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"I support the efforts of the people of California to recognize marriage as a unique institution between a man and a woman, just as we did in my home state of Arizona. I do not believe judges should be making these decisions."

- U.S. Senator John McCain
Candidate for President

Bring this Guide with you to your Polling Place on Election Day! Official Republican Candidates for Important Local Office

CITY OFFICES

- City of Carlsbad*
Farrah Douglas – Council
Ann Kulchin – Council
- City of Chula Vista*
Russ Hall – Council Seat 3
Scott Vinson – Council Seat 4
- City of Coronado*
Tom Stickel – Mayor
Peter Fagan – Council
Peter Jensen – Council
- City of El Cajon*
Bill Wells – Council
Bob McClellan – Council
Jillian Hanson-Cox – Council
- City of Encinitas*
Jerome Stocks – Council
Harriet Seldin – Council
Joe Sheffo – Council
- City of Escondido*
Sam Abed – Council
Ed Gallo – Council
- City of La Mesa*
Ruth Sterling – Council
Shannon O'Dunn – Council
- City of Lemon Grove*
Mary England – Council
- City of Oceanside*
Rocky Chavez – Mayor
Jim Gibson – Council
Jack Feller – Council
Rosemary Jones – Treasurer
- City of San Marcos*
Hal Martin – Council
Rebecca Jones – Council
- City of Santee*
Randy Voepel – Mayor
Jack Dale – Council
- City of Vista*
John Aguilera

SCHOOL BOARDS

- Alpine Union School District*
Mark Price
- Cajon Valley Union School District*
Kelli Dole

- Chula Vista Elementary School District*
Archie McAllister – Seat 2
- Coronado Unified School District*
Doug Metz
- Encinitas Union School District*
Maureen Muir
- Escondido Union High School District*
Kurt Marler
- Grossmont-Cuyamaca Community College District*
Bill Garrett – Seat 3
Tim Caruthers – Seat 4
- Grossmont Union High School District*
Meg Jedynak
Gary Woods
- Oceanside Unified School District*
Mike Blessing
- Palomar Community College District*
Rose Marie Dishman
Darrell McMullen
- Poway Unified School District*
Darin Hunzeker
- Ramona Unified School District*
Dan Lopez
Dawn Perfect
- San Diego Community College District*
John Edwards – District B
- San Diego Unified School District*
Mitz Lee – District A
Xeng Yang – District E
- San Marcos Unified School District*
David Horacek
- San Pasqual Union School District*
Howard Cottom
- Southwestern Community College District*
Jean Roesch – Seat 1
- Sweetwater Union High School District*
Lorenzo Provencio – Seat 2
- Vista Unified School District*
Patty Anderson
Stephen Guffanti
Eileen Fernandez

FIRE BOARDS

- Alpine Fire Protection District*
Steve "Kosmo" Kramer
- San Diego Rural Fire Protection District*
Louis Russo
- San Miguel Consolidated Fire Protection District*
Larry Jackman
David Rickards
- Vista Fire Protection District*
Margaret Morgan

HEALTH AND HOSPITAL BOARDS

- Grossmont Healthcare District*
Michael Long – Short Term
Jim Stieringer – Full Term
Michael Emerson – Full Term
- Palomar Pomerado Health District*
Lee Thibadeau – Short Term
Evelyn Madison – Full Term
- Tri-City Healthcare Board*
Rosemarie Reno
David Tweedy

WATER BOARDS

- Helix Water District*
Chuck Muse – Division 3
- Otay Water District*
Mark Robak
- Padre Municipal Water District*
Auggie Scalzitti – Division 2
August Caires – Division 4
- Ramona Municipal Water District*
Red Hager – Division 5
- South Bay Irrigation District*
Jim Doud – Division 2
James Alkire – Division 3

PLANNING, COMMUNITY SERVICE AND UTILITY BOARDS

- Fallbrook Community Planning Board*
Roy Moosa
- Ramona Community Planning Group*
Carolyn Dorroh

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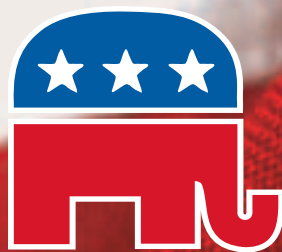
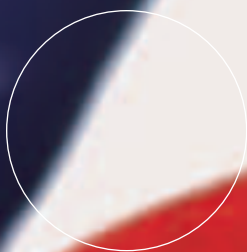
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Vote on Tuesday, July 26th

Polls open at 7:00am and Close at 8:00pm



**Steve Francis
for Mayor**

**ENDORSED BY THE
REPUBLICAN PARTY
OF SAN DIEGO COUNTY**

Endorsed by Republican State Legislators George Plescia, Shirley Horton, Mark Wyland, Mimi Walters, Ray Haynes and Bill Morrow

**Steve Francis Has A Plan
For San Diego**

- No bankruptcy... No higher taxes
- Cut city council budget and pay 20%
- Performance audits of city departments
- Rollback illegal 1996 and 2002 pension deals



**VOTE YES ON
PROPOSITION A TO:**

- Join hundreds of thousands of our fellow San Diegans who wish to save the Mount Soledad Veterans Memorial by transferring it to the Federal government
- Stand with President Bush and the United States Congress in recognizing Mount Soledad as a National War Memorial
- Honor our veterans and protect our heritage
- Permanently preserve this historic monument—**AS IT IS, WHERE IT IS!**



 **YES ON A**
As it is, where it is!

Vote on Tuesday, July 26th

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YES! I'm interested in being involved with the
Republican Party. Please send me information.

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Address: _____

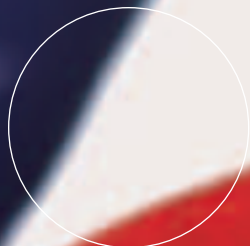
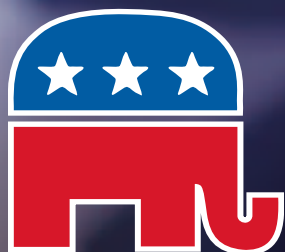
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Vote Republican!

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Vote on Tuesday, July 26th

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Steve Francis for Mayor

“Eighteen years ago my wife Gayle and I moved our business here because we loved San Diego and wanted to raise our family here, but right now our city is in a meltdown and we need to turn it around. If we are going to fix city hall, it won’t take higher taxes and it won’t take bankruptcy, it will take changing the people who run it.”

— Steve Francis

Steve Francis is a businessman, CEO who is committed to taking city hall back from the special interests. Steve’s comprehensive plan to restore San Diego can be read at www.stevesplan.com. Steve Francis is exactly what San Diego needs — an outsider with a plan to get our city out of its fiscal crisis without bankruptcy and without new taxes.



VOTE YES ON PROPOSITION A!

Vote **YES** on **Proposition A** to save the Mount Soledad Veterans Memorial, with its centerpiece 29-foot cross and surrounding walls and plaques, by transferring the site of this historic monument to the federal government where it will be protected under the Constitution of the United States as a national war memorial - **AS IT IS, WHERE IT IS**

The Mount Soledad Veterans Memorial was built in 1954 as a tribute to the veterans of the Korean War, and has since been expanded in dedication to veterans of all wars. The people of San Diego treasure this sacred memorial and public asset. Failure to protect Mount Soledad as it stands today will place many other noble symbols of our past in jeopardy. Transferring the property to the federal government is the only way to preserve Mount Soledad so future generations can honor those who have sacrificed to protect the freedoms of this great nation.

Vote on Tuesday, July 26th

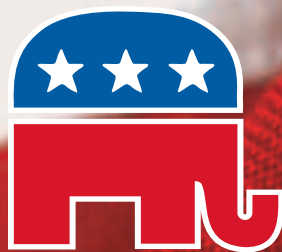
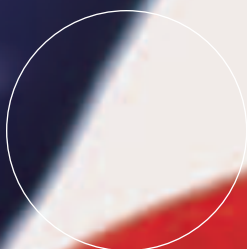
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Vote on Tuesday, November 8th

Polls open at 7:00am and Close at 8:00pm



Jerry Sanders
Businessman/
Retired Police Chief

The only candidate with experience turning around troubled organizations and making the tough decisions needed to clean house at City Hall to get San Diego back on track.



Kevin Faulconer
Businessman

“We need accountability and balanced budgets at City Hall, not higher taxes. I’ll fight City Hall secrecy and demand the highest ethical standards.” —Kevin Faulconer



Luis Acle
President, Board of
Education

A schoolteacher with an MBA from Stanford who served in Ronald Reagan’s White House, Acle is a proven leader with a 30-year history of fiscal management.

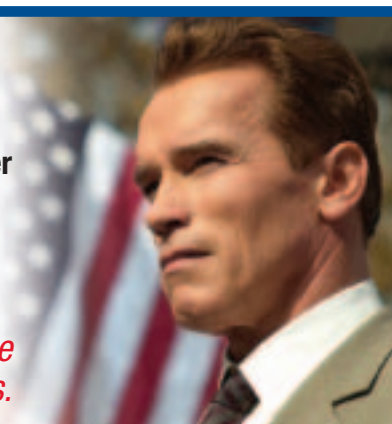


“Let’s reform California so that together we can rebuild it.”

— Governor Arnold Schwarzenegger

Election Day is your chance to be a part of Arnold’s historic team that reforms and rebuilds California.

See the reverse side to find out more about Arnold’s initiatives.



Vote on Tuesday, November 8th

Polls open at 7:00am and Close at 8:00pm

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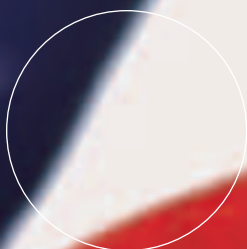
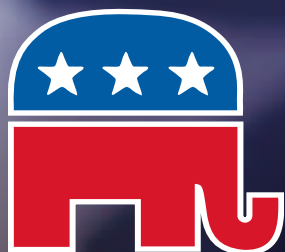
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Vote on Tuesday, November 8th

Polls open at 7:00am and Close at 8:00pm

Summary of Initiatives

YES! Proposition 73: Parents' Right to Know and Child Protection Initiative.

Requires a parent be notified and a 48 hour waiting period before a minor's pregnancy is terminated.

YES! Proposition 74: The Put Kids First Act. Improves the education system and helps ensure our kids get the best education and the best teachers possible.

YES! Proposition 75: Paycheck Protection. Gives workers who are members of a union the power to choose whether the dues they pay can be used for politics. Puts an end to forcing union members to pay for political campaigns and controversial issues that they disagree with.

YES! Proposition 76: Live Within Our Means Act. Forces the Legislature to live by the same basic rule California families live by: Don't spend more money than you bring in. Endorsed by the Howard Jarvis Taxpayers Association and all major taxpayer organizations statewide.

YES! Proposition 77: Voter Empowerment Act. Takes redistricting out of the hands of politicians and makes them more accountable to the voters. Instead of politicians, a bi-partisan independent panel of three retired judges will draw fair and competitive district lines.

YES! Proposition 78: The RIGHT Prescription Drug Plan. Offers Californians struggling with high prescription drug costs real help, right now. Prop. 78 is a proven program that can take effect immediately, and will deliver critically needed prescription drug discounts to millions of seniors and low income, uninsured Californians.

NO! Proposition 79: The WRONG Prescription Drug Plan. Flawed drug initiative that won't be approved by the federal government. Opens the door to frivolous lawsuits and could deny prescription drugs to low income Medi-Cal patients.

NO! Proposition 80: Electricity Re-Regulation. An anti-consumer, anti-environmental, high-risk approach to California's energy policy. Undermines current efforts to prevent blackouts and increase energy supplies, denies customers an option for lower cost and green electricity. Limits state goals for more environmentally-friendly energy generation.

For additional information, visit www.SanDiegoRepublicans.org

Official Republican Candidates in San Diego

Jerry Sanders for Mayor

Kevin Faulconer for City Council, District 2

Luis Acle for City Council, District 8

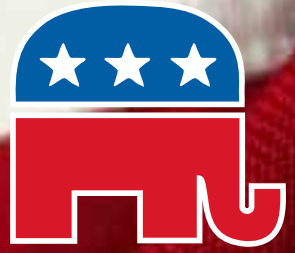
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Republican Voters:

Please join the Republican Party of San Diego in supporting The Reform Team to protect taxpayers, clean up the mess at City Hall and get San Diego back on track.

Send The Reform Team to City Hall



Jerry Sanders
Mayor



Carl DeMaio
City Council District 5



Jan Goldsmith
City Attorney



April Boling
City Council District 7



YES ON PROPOSITION A

Ensures firefighters, sworn police officers and lifeguards must be city employees, not private contractors.

YES ON PROPOSITION B

Guarantees public right to vote on extending Strong Mayor; toughens mayoral veto authority.

YES ON PROPOSITION C

Makes auditor independent of politicians and city employees. Restores credibility and investor confidence so the City can finance backlogged water, sewer, and road repairs.

Vote on Tuesday, June 3rd
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Help send The Republican Reform Team to City Hall.

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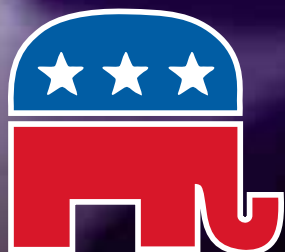
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The Republican Party of San Diego County

The Republican Party of San Diego County has endorsed the following candidates for other local offices:

County Board of Supervisors

District 1: Greg Cox

District 2: Dianne Jacob

District 3: Pam Slater-Price

County Board of Education

District 2: Jerry Rindone

District 4: Chuck Taylor

San Diego Community College District

District B: Ryan Mulvey

District D: Autumn Frank

San Diego Unified School District

District A: Mitz Lee

Superior Court Judge

Office 19: Paul Cooper

Office 45: Robert Faigin

City of Chula Vista

City Council - Seat 3: Russ Hall

City Council - Seat 4: Scott Vinson

No on Proposition E

For additional information, visit www.SanDiegoRepublicans.org

Vote on Tuesday, June 3rd

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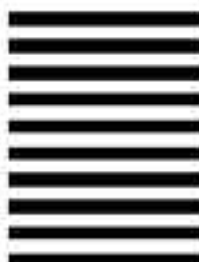


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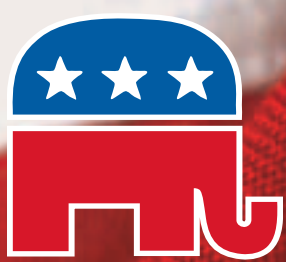
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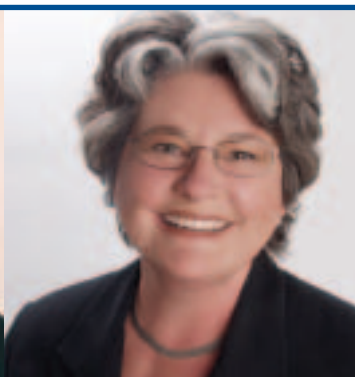
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Important: Complete and return the post card below to receive important official election information from the Republican Party of San Diego County.

Official Republican Candidates



Brian Bilbray
CD 50 Special election
Republican Nominee

Gary Felien
San Diego County Board of
Education, District 5

Judy Riddle
San Diego City Council,
District 6

Message from Chairman Ron Nehring

Fellow Republican,

On June 6th you can help send a message from San Diego by electing all of our highly qualified Republican candidates for every office on the ballot.

Please keep this guide with you when you go to vote on TUESDAY, JUNE 6th.

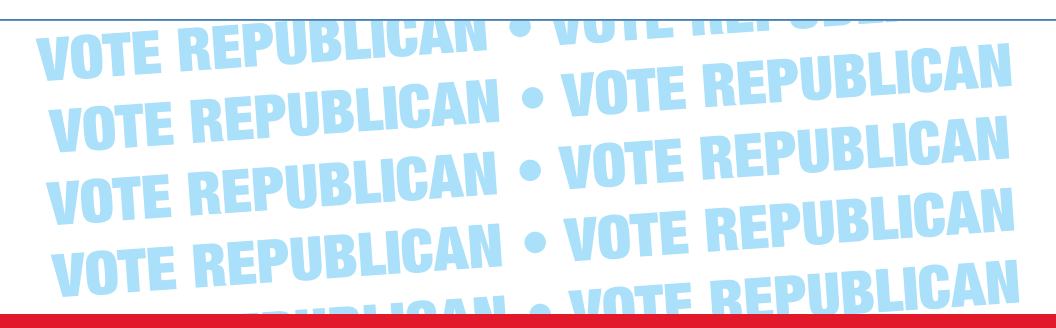
Polls open at 7:00 AM and close at 8:00 PM.

Finally, we hope you'll take the opportunity to become active in the Republican Party of San Diego County by returning the reply card at the bottom of this page. We'll keep you informed of upcoming news and developments of interest to you as a member of the Republican Party.

Thank you for being a member of the Republican Party, San Diego's majority party.

Sincerely,

Ron Nehring
CHAIRMAN, Republican Party of San Diego County



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YES! Send me information about the
Republican Party in San Diego County.

Name: _____

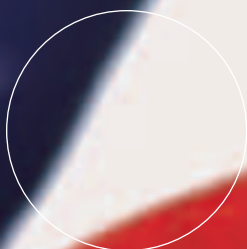
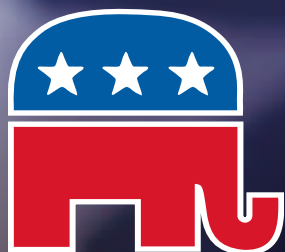
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E-mail (very important): _____

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**Vote
Republican!**

Official Republican Candidates

San Diego County Board of Education, District 5

Gary Felien

- Student safety must be our top priority
- Will reduce bureaucracy and increase classroom funding
- Endorsed by Congressman Darrell Issa and State Senator Bill Morrow

San Diego City Council, District 6

Judy Riddle

“Our city receives adequate tax dollars to provide excellent community services. The city council needs to put a stop to wasteful spending!”

BONNIE DUMANIS San Diego County District Attorney

DAN McALLISTER San Diego County Treasurer/Tax Collector

GREGORY SMITH San Diego County Assessor/Recorder/Clerk

RON ROBERTS San Diego County Supervisor, District 4

JAMES HAIRGROVE Superior Court Judge Office 16

LARRY “JAKE” KINCAID Superior Court Judge Office 36

PAUL J. PFINGST Superior Court Judge Office 49

Summary of Initiatives

San Diego County Proposition A: “Clean-Up” Amendments to the San Diego County Charter

Vote YES—It is time to modernize the San Diego Charter! Vote Yes on Measure A.

San Diego County Proposition B: Important technical clarification to the county charter concerning write-in candidates

Vote YES—Vote Yes on Measure B.

Proposition 81: Vote NO—Higher taxes and increased spending hurts California families! Vote No on 81.

Proposition 82: Income tax increase, government-run pre-school

Vote NO – Vote No on this big tax increase. No on 82.

For additional information, visit www.SanDiegoRepublicans.org

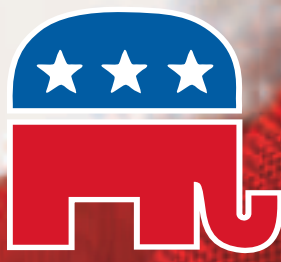
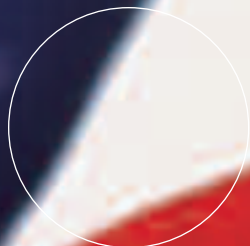
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5703 Oberlin Drive, Suite 107
San Diego, CA 92121

Delivered by
your volunteer
Republican
Neighborhood
Precinct
Representative



Republican Party of San Diego County Official Voting Guide

Official Republican Candidates



Arnold Schwarzenegger
Governor



Brian Bilbray
50th Congressional District



Martin Garrick
State Assembly District 74

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

- Tom McClintock** Lt. Governor
- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

Richard "Dick" Mountjoy **US Senate**
Darrell Issa **49th Congressional District**

Dennis Hollingsworth **State Senate District 36**
Mark Wyland **State Senate District 38**
Larry "Jake" Kincaid **County Superior Court Judge**

City of San Diego Initiatives

Vote YES on B
Mayor Jerry Sanders' Reform Plan.
 Requires future city pension benefit increases to go to the people for a vote.

Vote YES on C
Mayor Jerry Sanders' Reform Plan.
 Reduce costs and improve quality for city services.

California State Initiatives (partial listing)

- Vote YES on Prop 1A**
Make sure gas taxes are used for roads.
- Vote YES on 83**
Stop sexual predators with Jessica's Law.
- Vote NO on 84**
California Republican Party recommends voting no on this bond.
- Vote YES on 85**
Require parents be informed before termination of a minor's pregnancy.
- Vote NO on 86**
Another tax increase.

- Vote NO on 87**
Tax increase that will RAISE GAS PRICES.
 - Vote NO on 88**
Tax increase on your home.
 - Vote NO on 89**
Tax increase that will kill California jobs.
 - Vote YES on 90**
Stop government from taking people's property without proper compensation. Vote YES!
- Prop 1B - YES • Prop 1C - NO • Prop 1E - YES**

For complete information and ballot recommendations visit www.SanDiegoRepublicans.org

Vote on Tuesday, November 7th
 Polls open at 7:00am and Close at 8:00pm

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YES! I want to get involved in the Republican campaign, please contact me!

Name: _____

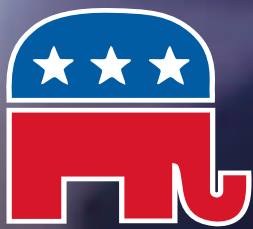
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Vote Republican!



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CITY OFFICES

City of Carlsbad
Claude "Bud" Lewis - Mayor
Mark Packard - City Council
Matt Hall - City Council
Lorraine Wood - City Clerk
Harold "Mac" Mc Sherry - City Treasurer

City of Del Mar
Laura De Marco - City Council
Jerry Finnell - City Council

City of Encinitas
Thomas Brown - City Council
Doug Long - City Council

City of Escondido
Lori Holt Pfeiler - Mayor
Marie Waldron - City Council
Dick Daniels - City Council

City of Oceanside
Jerry Kern - City Council
Rocky Chávez - City Council

City of San Marcos
F.H. "Corky" Smith - Mayor
Mike Preston - City Council

City of Solana Beach
Deanne Borer - City Council

City of Vista
Morris Vance - Mayor
Bob Campbell - City Council
Judy Ritter - City Council

SCHOOL DISTRICTS

Miracosta Community College Board
Rodolfo "Rudy" Fernandez - Area 1
Gregory Post - Area 2

Palomar Community College Board
Christopher Smith

Carlsbad Unified School District
Lisa Rodman
Josephine Lewis
Mark Tanner

Oceanside Unified School District
Emily Ortiz Wichmann

San Marcos Unified School District
Cyndy Minnery

Vista Unified School District
Patty Anderson
Jim Gibson

Escondido Union High School Board
Tina Pope
Pam Grosso
Jon Petersen
San Dieguito Union High School Board
Stephen Cochran

Bonsall Union School District
Lou Riddle
Timothy Coen
Bill Bryant

Del Mar Union School District
Steve Mc Dowell
Martha Murphy
Annette Easton

Encinitas Union School District
Maureen "Mo" Muir

Escondido Union School District
Joan Gardner
Marv Gilbert

Rancho Santa Fe School District
Scot Cheatham
Carlie Headapohl

Solana Beach School District
Jeff Busby

WATER DISTRICTS

Leucadia Waste Water District
David Kulchin
Tracy Peterson

Questhaven Municipal Water District
Phyllis Jean Issac - Division 1
Elizabeth Wood - Division 3
Blake Issac - Division 5

Rincon Del Diablo Water District
John Hinrichs - Division 3
Gregory Quist - Division 1

Vallecitos Water District
Trish Hannan - Division 2

Valley Center Municipal Water District
Randy Haskell - Division 2
Merle Aleshire - Division 5

Santa Fe Irrigation District
John Ingalls - Division 3
Michael Hogan - Division 4
Augustus Daddi - Division 5

Vista Irrigation District
Paul Campo - Division 1

FIRE DISTRICTS

Deer Springs Fire Protection District
Robert Winje
Frank Donnelly
Bruce Tebbs

Rancho Sante Fe Fire Protection District
Thomas Hickerson
John Tanner

Valley Center Fire Protection District
William Lee Palmer
Weaver Simonsen
Mel Schuler

Vista Fire Protection District
Read Miller
Richard Hemenez

SPECIAL DISTRICTS

Fallbrook Healthcare
Gordon Tinker
Milton Davies
Daniel Goldberg

Palomar Pomerado Health Board
Ted Kleiter
Bruce Krider

Tri-City Healthcare Board of Directors
Larry Schallock

Valley Center Parks & Recreation
Fran DeWilde

Rancho Sante Fe Community Services
John Tanner
Ronald McMahon

Whispering Palms Community Services
John Mirza

San Dieguito Community Planning Board
Donald Willis
Chaco Clotfelter
Ira Epstein
Thomas Hickerson
Laurel Lemarie
Bill Schlosser

Valley Center Community Planning Board
Eric Laventure
David Montross

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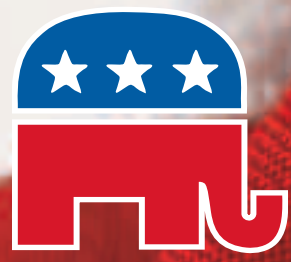
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Governor



Brian Bilbray
50th Congressional District



George Plescia
State Assembly District 75

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- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

- Richard "Dick" Mountjoy** **US Senate**
- Darrell Issa** **49th Congressional District**
- Duncan Hunter** **52nd Congressional District**
- John "Woody" Woodrum** **53rd Congressional District**

- Dennis Hollingsworth** **State Senate District 36**
- Mark Wyland** **State Senate District 38**
- Larry "Jake" Kincaid** **County Superior Court Judge**
- Michael "Mike" McSweeney** **San Diego Unified School District**

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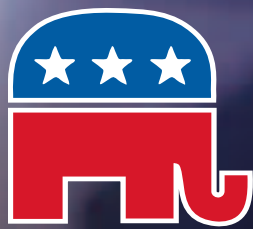
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City of Escondido
Lori Holt Pfeiler - Mayor
Dick Daniels - City Council
Marie Waldron - City Council

City of Poway
Mickey Cafagna - Mayor
Betty Rexford - City Council

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board
Deana Weeks - District 1
Rick Alexander - District 2
Bill Garrett - District 3
Arkan Somo - District 5

Miracosta Community College Board
Rodolfo "Rudy" Fernandez - Area 1
Gregory Post - Area 2

Palomar Community College Board
Christopher Smith

Poway Unified School District
T.J. Zane
Jeff Mangum
Penny Ranftle

Ramona Unified School District
Rodger Dohm
William "Bill" Jenkin
Bob Stoodly

San Diego Unified School District
Michael "Mike" McSweeney

Escondido Union High School Board
Tina Pope
Jon Petersen
Pam Grosso

Grossmont Union High School Board
Robert Shield
Shari Groce
Jim Kelly

San Dieguito Union High School Board
Stephen Cochrane

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Martha Murphy
Annette Easton
Steve McDowell

Escondido Union School District
Marv Gilbert
Joan Gardner

Lakeside Union School District
C. Keith Hildreth
Harold Hilliker
Kevin Howe

San Pasqual Union School District
D. Matt Marschall
Darlene Hansen

Rancho Santa Fe School District
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Carlie Headapohl

Solana Beach School District
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Rincon Del Diablo Water District
Gregory Quist - Division 1
John Hinrichs - Division 3

Valley Center Municipal Water District
Randy Haskell - Division 2
Merle Aleshire - Division 5

Santa Fe Irrigation District
John Ingalls - Division 3
Michael Hogan - Division 4
Augustus Daddi - Division 5

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Lakeside Fire Protection District
Peter Liebig
Emad Bakeer

Rancho Sante Fe Fire Protection District
Thomas Hickerson
John Tanner

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Will Eastwood

Valley Center Fire Protection District
Mel Schuler
William Lee Palmer
Weaver Simonsen

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Palomar Pomerado Health Board
Ted Kleiter
Bruce Krider

Rancho Sante Fe Community Services
Ronald McMahan
John Tanner

Whispering Palms Community Services
John Mirza

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Mark Turvey
Anton Botter
Julie Bugbee
Chad Enniss
Glenn Inverso
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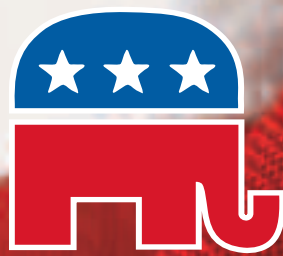
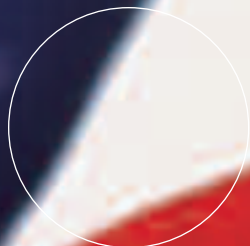
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Governor

Tom McClintock
Lt. Governor

Joel Anderson
State Assembly District 77

Bring this to your polling place on Election Day!

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Chuck Poochigian Attorney General

Tony Strickland Controller

Claude Parrish Treasurer

Steve Poizner Insurance Commissioner

Michelle Steel Board of Equalization

Richard "Dick" Mountjoy **US Senate**

Brian Bilbray **50th Congressional District**

Blake Miles **51st Congressional District**

Duncan Hunter **52nd Congressional District**

Dennis Hollingsworth **State Senate District 36**

Larry "Jake" Kincaid **County Superior Court Judge**

City of San Diego Initiatives

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Vote NO on 87

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Vote YES on 83

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Vote NO on 88

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Vote NO on 84

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Vote NO on 89

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Vote YES on 90

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Vote YES!

Vote NO on 86

Another tax increase.

Prop 1B - YES • Prop 1C - NO • Prop 1E - YES

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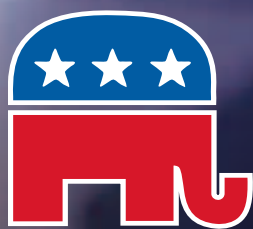
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CITY OFFICES

City of El Cajon
Mark Lewis - Mayor
Gary Kendrick - City Council

City of La Mesa
Jim Stieringer - Mayor
Mark Arapostathis - City Council
Ernest Ewin - City Council
Eldon "Bud" Vogt - City Treasurer

City of Santee
Brian Jones - City Council
John Mirto - City Council
Hal Ryan - City Council

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board
Deana Weeks - Seat 1
Rick Alexander - Seat 2
Bill Garrett - Seat 3
Arkan Somo - Seat 5

Palomar Community College Board
Christopher Smith

Southwestern Community College Board
G. Michael German - Seat 2
Jorge Dominguez - Seat 5

Borrego Springs Unified School District
Margaret Orenyak

Mountain Empire Unified Board of Trustees
Ralph Davis - Area 1
Kenneth Northcote - Area 3
Beryl Buchanan - Area 4
Danny Nunez - Area 5

Poway Unified School District
Penny Ranfile
Jeff Mangum
T.J. Zane

Ramona Unified School District
William "Bill" Jenkin
Rodger Dohm
Bob Stody

San Diego Unified School District
Michael "Mike" McSweeney

Warner Unified School District
Karen Willat
David Bantz

Grossmont Union High School Board
Shari Groce
Robert Shield
Jim Kelly

Julian Union High School Board
David Carey
Stacy Peyakov
Mark Bakken

Sweetwater Union High School Board
Jim Cartmill - District 1
Archie McAllister - District 3
Ed Herrera - District 5

Alpine Union School Board
Eric Wray
Louis Russo
Matt Schumsky

Cajon Valley Union School District
Jill Barto

Julian Union School District
Susan Slaughter
Joy Booth

Lakeside Union School District
C. Keith Hildreth
Harold Hilliker
Kevin Howe

San Pasqual Union School District
D. Matt Marschall
Darlene Hansen

Chula Vista Elementary School District
Larry Cunningham - District 5

Dehesa School District
Cynthia White
Kimberly Pike
Chuck Huskey

La Mesa-Spring Valley School Board
Penny Halgren
Bob Duff
Emma Turner
Rick Winet

San Ysidro School District
Tim Gomez
Yolanda Hernandez

Santee School District
Barbara Ryan - District 1
James Towle - District 3
Allen Carlisle - District 5

WATER DISTRICTS

Borrego Water District
Roger Anderson
Richard "Dick" Walker

Canebrake County Water District
Carl Mc Kenney
Paul Deschamps

Helix Water District
DeAna Verbeke - Division 2
James Lewanski - Division 4

Lakeside Water District
John Belleau - Division 2
Frank Hilliker - Division 3

Otay Water District
Larry Breittfelder - Division 1
Gary Croucher - Division 3

Padre Dam Municipal Water District
Jim Maletic - Division 1
Andy Menshek - District 3
Patricia Cannon - District 5

Ramona Municipal Water District
Jim Robinson - Division 4

Riverview Water District
Mark Godwin
Gale Ruffin

FIRE DISTRICTS

Alpine Fire Protection Board
Jim Easterling
Steve "Kosmo" Kramer
Martin Marugg

Borrego Springs Fire Protection District
Richard Anson
Robert Kenneth Moore

East County Fire Protection District
Gilbert Mastro
Merritt Strickland

Julian-Cuyamaca Fire Board
Bent Koch

Lakeside Fire Protection District
Peter Liebig
Emad Bakeer

Pine Valley Fire Protection District
Benjamin Tulloch
Franklin Whiteley

San Diego Rural Fire Protection Board
Will Eastwood
J.R. "Randy" Terry

San Miguel Fire Protection District
Tom Clark
Richard "Rick" Augustine

SPECIAL DISTRICTS

Grossmont Healthcare Board
Hikmat Shammis

Palomar Pomerado Health Board
Bruce Krider
Ted Kleiter

Borrego Springs Park & Community Services
Dennis Russell

Jacumba Community Services
Rick Johnson

Alpine Community Planning Board
Brad Bailey
Jim Easterling
Louis Russo
Matt Schumsky
Chuck Taylor
David Waitley

Boulevard Community Planning Board
Nazar Najor

Campo/Lake Morena Community Planning Board
Jean Bates
Debra Ford
Richard Northcote
Walt Palmer

Crest Community Planning Board
Pat Ulm

Dehesa Community Planning Board
Richard White

Descanso Community Planning Board
John Elliott

Harbison Canyon Community Planning Board
Jack Vandover

Jamul/Dulzura Community Planning Board
Randy White
Janice Grace
Janet Mulder

Lakeside Community Planning Board
Julie Bugbee
Anton Botter
Emad Bakeer
Glenn Inverso
Mark Turvey
Chad Enniss

Pine Valley Community Planning Board
Cherry Diefenbach
Terry Glardon
Carol Johnson

Potrero Community Planning Board
Gordon Hammers
Mary Johnson
Thell Fowler

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William "Bill" Jenkin
Beverly Ragsdale
Beverly Maes
Dennis Grimes

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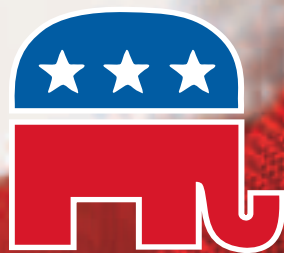
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Official Republican Candidates



Cheryl Cox
Mayor Chula Vista



Shirley Horton
State Assembly District 78

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- Arnold Schwarzenegger** Governor
- Tom McClintock** Lt. Governor
- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
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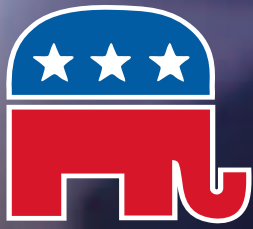
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City of Chula Vista
Cheryl Cox - Mayor

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Deana Weeks - Division 1
Rick Alexander - Division 2
Bill Garrett - Division 3
Arkan Somo - Division 5

Southwestern Community College Board
G. Michael German - Seat 2
Jorge Dominguez - Seat 5

San Diego Unified School District
Michael "Mike" McSweeney

Grossmont Union High School Board
Robert Shield
Shari Groce
Jim Kelly

Sweetwater Union High School District
Jim Cartmill - District 1
Archie McAllister - District 3
Ed Herrera - District 5

Cajon Valley Union School District
Jill Barto

Chula Vista Elementary School District
Larry Cunningham - District 5

La Mesa-Spring Valley School Board
Bob Duff
Emma Turner
Rick Winet
Penny Halgren

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Helix Water District
James Lewanski - Division 4
DeAna Verbeke - Division 2

Otay Water District
Larry Breitfelder - Division 1
Gary Croucher - Division 3

FIRE DISTRICTS

Bonita-Sunnyside Fire Protection District
Thomas Pocklington
Joanne Stonecipher

San Diego Rural Fire Protection Board
J.R. "Randy" Terry
Will Eastwood

San Miguel Fire Protection District
Tom Clark
Richard "Rick" Augustine

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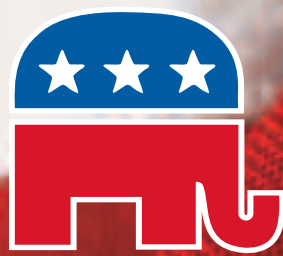
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Republican Party of San Diego County Official Voting Guide

Official Republican Candidates



Michael "Mike" McSweeney
San Diego Unified School District



Shirley Horton
State Assembly District 78

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

- Arnold Schwarzenegger** Governor
- Tom McClintock** Lt. Governor
- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

Dennis Hollingsworth **State Senate District 36**

Larry "Jake" Kincaid **County Superior Court Judge**

Michael "Mike" McSweeney **San Diego Unified School District**

City of San Diego Initiatives

Vote YES on B

Mayor Jerry Sanders' Reform Plan.
Requires future city pension benefit increases to go to the people for a vote.

Vote YES on C

Mayor Jerry Sanders' Reform Plan.
Reduce costs and improve quality for city services.

California State Initiatives *(partial listing)*

Vote YES on Prop 1A

Make sure gas taxes are used for roads.

Vote NO on 87

Tax increase that will RAISE GAS PRICES.

Vote YES on 83

Stop sexual predators with Jessica's Law.

Vote NO on 88

Tax increase on your home.

Vote NO on 84

California Republican Party recommends voting no on this bond.

Vote NO on 89

Tax increase that will kill California jobs.

Vote YES on 85

Require parents be informed before termination of a minor's pregnancy.

Vote YES on 90

Stop government from taking people's property without proper compensation. Vote YES!

Vote NO on 86

Another tax increase.

Prop 1B - YES • Prop 1C - NO • Prop 1E - YES

For complete information and ballot recommendations visit www.SanDiegoRepublicans.org

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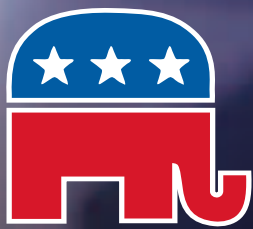
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Official Republican Candidates for Important Local Offices.

CITY OFFICES

City of Chula Vista
Cheryl Cox - Mayor

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board

Deana Weeks - Division 1
Rick Alexander - Division 2
Bill Garrett - Division 3
Arkan Somo - Division 5

Southwestern Community College Board
G. Michael German - Seat 2
Jorge Dominguez - Seat 5

San Diego Unified School District
Michael "Mike" McSweeney

Grossmont Union High School Board
Robert Shield
Shari Groce
Jim Kelly

Sweetwater Union High School District
Jim Cartmill - District 1
Archie McAllister - District 3
Ed Herrera - District 5

Cajon Valley Union School District
Jill Barto

Chula Vista Elementary School District
Larry Cunningham - District 5

La Mesa-Spring Valley School Board
Bob Duff
Emma Turner
Rick Winet
Penny Halgren

WATER DISTRICTS

Helix Water District
James Lewanski - Division 4
DeAna Verbeke - Division 2

Otay Water District
Larry Breitfelder - Division 1
Gary Croucher - Division 3

FIRE DISTRICTS

Bonita-Sunnyside Fire Protection District
Thomas Pocklington
Joanne Stonecipher

San Diego Rural Fire Protection Board
J.R. "Randy" Terry
Will Eastwood

San Miguel Fire Protection District
Tom Clark
Richard "Rick" Augustine

SPECIAL DISTRICTS

Grossmont Healthcare Board
Hikmat Shammass

Jamul/Dulzura Community Planning Board
Randy White
Janet Mulder
Janice Grace

Spring Valley Community Planning Board
Marilyn Wilkinson

Sweetwater Community Planning Board
Harriet Taylor
John Taylor
Rick Blacklock
Alan Sachrison
Ken Byrd

Valle de Oro Community Planning Board
John Hewicker
Donald Fitchett

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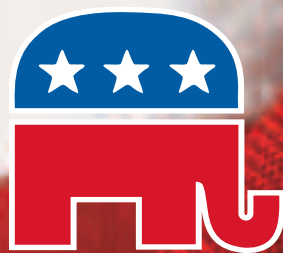
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Republican Party of San Diego County Official Voting Guide **Official Republican Candidates**



Arnold Schwarzenegger
Governor

Tom McClintock
Lt. Governor

Kevin Jeffries
State Assembly District 66

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

Bruce McPherson Secretary of State

Chuck Poochigian Attorney General

Tony Strickland Controller

Claude Parrish Treasurer

Steve Poizner Insurance Commissioner

Michelle Steel Board of Equalization

Richard "Dick" Mountjoy **US Senate**

Darrell Issa **49th Congressional District**

Duncan Hunter **52nd Congressional District**

Dennis Hollingsworth **State Senate District 36**

Mark Wyland **State Senate District 38**

Larry "Jake" Kincaid **County Superior Court Judge**

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Vote YES on Prop 1A

Make sure gas taxes are used for roads.

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Stop sexual predators with Jessica's Law.

Vote NO on 84

California Republican Party recommends voting no on this bond.

Vote YES on 85

Require parents be informed before termination of a minor's pregnancy.

Vote NO on 86

Another tax increase.

Vote NO on 87

Tax increase that will RAISE GAS PRICES.

Vote NO on 88

Tax increase on your home.

Vote NO on 89

Tax increase that will kill California jobs.

Vote YES on 90

Stop government from taking people's property without proper compensation. Vote YES!

Prop 1B - YES • Prop 1C - NO • Prop 1E - YES

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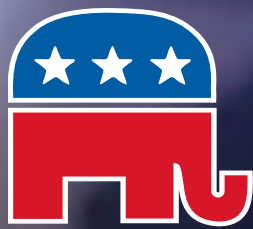
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CITY OFFICES

City of Oceanside
Jerry Kern - City Council
Rocky Chávez - City Council

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board
Deana Weeks - Seat 1
Rick Alexander - Seat 2
Bill Garrett - Seat 3
Arkan Somo - Seat 5
Palomar Community College District
Christopher Smith

Ramona Unified School District
Rodger Dohm
William "Bill" Jenkin
Bob Stody

Warner Unified School District
Karen Willat
David Bantz

Escondido Union High School Board
Pam Grosso
Jon Petersen
Tina Pope

Fallbrook Union High School Board
Michael Shulte
Fran White
Jim Hutcherson

Grossmont Union High School Board
Robert Shield
Jim Kelly
Shari Groce

Julian Union High School Board
Stacy Peyakov
Mark Bakken
David Carey

Alpine Union School Board
Eric Wray
Louis Russo
Matt Schumsky

Bonsall Union School District
Bill Bryant
Timothy Coen
Lou Riddle

Escondido Union School District
Joan Gardner
Marv Gilbert

Julian Union School District
Joy Booth
Susan Slaughter

Fallbrook Union Elementary School Board
Maurice Bernier

Vallecitos School District
Craig Ohlson
Sandy Wells
Michelle La Londe

WATER DISTRICTS

Mootamai Municipal Water District
Don Cline - Division 1
Michael Biondi - Division 3

Pauma Municipal Water District
Yoneo Kariya - Division 5

Rainbow Municipal Water District
William "Bill" Bopf - Division 3
Stephen Abbott - Division 4

San Luis Rey Municipal Water District
William Pankey - Division 1
Thomas Veysey - Division 3
Claren Yarger - Division 5

Valley Center Municipal Water District
Randy Haskell - Division 2
Merle Aleshire - Division 5

Wynola Water District
Edward Huffman

Yuima Municipal Water District
Douglas Anderson - Division 1
W.D. "Bill" Knutson - Division 4

Vista Irrigation District
Paul Campo - Division 1

FIRE DISTRICTS

Alpine Fire Protection Board
Jim Easterling
Steve "Kosmo" Kramer
Martin Marugg

Deer Springs Fire Protection District
Robert Winje
Frank Donnelly
Bruce Tebbs

Julian-Cuyamaca Fire Board
Bent Koch

North County Fire Protection Board
Kenneth Munson
Kathleen Thuner

Pine Valley Fire Protection District
Benjamin Tulloch
Franklin Whiteley

San Diego Rural Fire Protection Board
J.R. "Randy" Terry
Will Eastwood

Valley Center Fire Protection District
Weaver Simonsen
Mel Schuler
William Lee Palmer

Vista Fire Protection District
Read Miller
Richard Hemenez

SPECIAL DISTRICTS

Fallbrook Healthcare Board
Daniel Goldberg
Milton Davies
Gordon Tinker

Grossmont Healthcare Board
Hikmat Shammas

Palomar Pomerado Health Board
Ted Kleiter
Bruce Krider

Tri-City Healthcare Board of Directors
Larry Schallock

Fallbrook Public Utility Board
Al Gebhart - Seat 4
Milton Davies - Seat 5

Valley Center Parks & Recreation
Fran DeWilde

Rincon Ranch Community Services
Bernard Jensen
Manny Grey

Pauma Valley Community Services
Richard Meyers
Ronald Stewart
William Taylor

Alpine Community Planning Board
Brad Bailey
Jim Easterling
Louis Russo
Matt Schumsky
Chuck Taylor
David Waitley

Descanso Community Planning Board
John Elliott

Fallbrook Community Planning Board
William "Bill" Bopf
Jack Wood
Paul Schaden
Jim Russell
Roy Moosa
Eileen Delaney
Thomas Harrington

Julian Community Planning Board
Kenney Mushet
Jean James

Pine Valley Community Planning Board
Cherry Diefenbach
Terry Glardon
Carol Johnson

Rainbow Community Planning Board
Dean Reade
Mila Bonner
Art Deming
Curtis Nicolaisen
Craig Ohlson
Larry Pearce
Rua Petty

Ramona Community Planning Board
William "Bill" Jenkin
Beverly Ragsdale
Dennis Grimes
Beverly Maes

Valley Center Community Planning Board
Eric Laventure
David Montross

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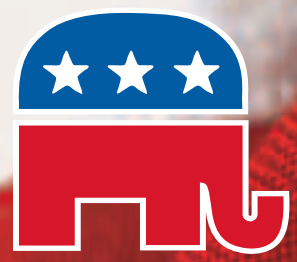
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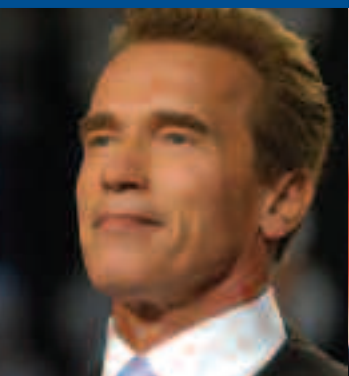
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Republican Party of San Diego County Official Voting Guide

Official Republican Candidates



Arnold Schwarzenegger
Governor



Tom McClintock
Lt. Governor



Mimi Walters
State Assembly District 73

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

Bruce McPherson Secretary of State

Chuck Poochigian Attorney General

Tony Strickland Controller

Claude Parrish Treasurer

Steve Poizner Insurance Commissioner

Michelle Steel Board of Equalization

Richard "Dick" Mountjoy **US Senate**

Darrell Issa **49th Congressional District**

Dennis Hollingsworth **State Senate District 36**

Mark Wyland **State Senate District 38**

Larry "Jake" Kincaid **County Superior Court Judge**

California State Initiatives (partial listing)

- Vote YES on Prop 1A**
Make sure gas taxes are used for roads.
- Vote YES on 83**
Stop sexual predators with Jessica's Law.
- Vote NO on 84**
California Republican Party recommends voting no on this bond.
- Vote YES on 85**
Require parents be informed before termination of a minor's pregnancy.
- Vote NO on 86**
Another tax increase.

- Vote NO on 87**
Tax increase that will RAISE GAS PRICES.
 - Vote NO on 88**
Tax increase on your home.
 - Vote NO on 89**
Tax increase that will kill California jobs.
 - Vote YES on 90**
Stop government from taking people's property without proper compensation. Vote YES!
- Prop 1B - YES • Prop 1C - NO • Prop 1E - YES**

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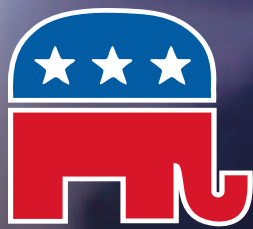
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**Official Republican Candidates
for Important Local Offices.**

CITY OFFICES

City of Carlsbad
Claude "Bud" Lewis - Mayor
Mark Packard - City Council
Matt Hall - City Council
Lorraine Wood - City Clerk
Harold "Mac" McSherry -
City Treasurer

City of Oceanside
Jerry Kern - City Council
Rocky Chávez - City Council

SCHOOL DISTRICTS

Palomar Community
College Board
Christopher Smith

Carlsbad Unified
School District
Mark Tanner
Lisa Rodman
Josephine Lewis

Oceanside Unified
School District
Emily Ortiz Wichmann

Vista Unified School District
Patty Anderson
Jim Gibson

Bonsall Union School District
Bill Bryant
Timothy Coen
Lou Riddle

FIRE DISTRICTS

North County Fire
Protection Board
Kenneth Munson
Kathleen Thuner

Vista Fire Protection
Richard Hemenez
Read Miller

SPECIAL DISTRICTS

Tri-City Healthcare
Board of Directors
Larry Schallock

Morro Hills Community
Services Board
Thomas Harrington
Barbara Romero

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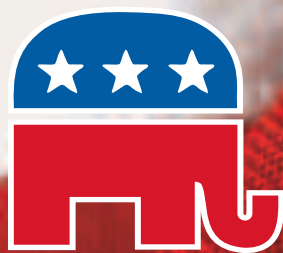
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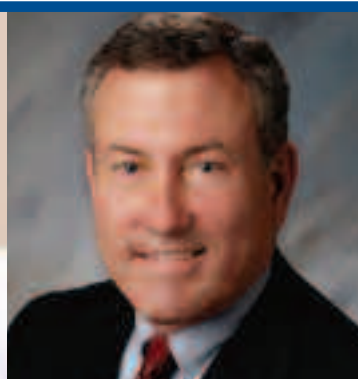
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Arnold Schwarzenegger
Governor

Brian Bilbray
50th Congressional District

Martin Garrick
State Assembly District 74

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

- Tom McClintock** Lt. Governor
- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

Richard "Dick" Mountjoy **US Senate**
Darrell Issa **49th Congressional District**

Dennis Hollingsworth **State Senate District 36**
Mark Wyland **State Senate District 38**
Larry "Jake" Kincaid **County Superior Court Judge**

City of San Diego Initiatives

Vote YES on B
Mayor Jerry Sanders' Reform Plan.
 Requires future city pension benefit increases to go to the people for a vote.

Vote YES on C
Mayor Jerry Sanders' Reform Plan.
 Reduce costs and improve quality for city services.

California State Initiatives *(partial listing)*

Vote YES on Prop 1A
 Make sure gas taxes are used for roads.

Vote NO on 87
 Tax increase that will RAISE GAS PRICES.

Vote YES on 83
 Stop sexual predators with Jessica's Law.

Vote NO on 88
 Tax increase on your home.

Vote NO on 84
 California Republican Party recommends voting no on this bond.

Vote NO on 89
 Tax increase that will kill California jobs.

Vote YES on 85
 Require parents be informed before termination of a minor's pregnancy.

Vote YES on 90
 Stop government from taking people's property without proper compensation. Vote YES!

Vote NO on 86
 Another tax increase.

Prop 1B - YES • Prop 1C - NO • Prop 1E - YES

For complete information and ballot recommendations visit www.SanDiegoRepublicans.org

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Address: _____

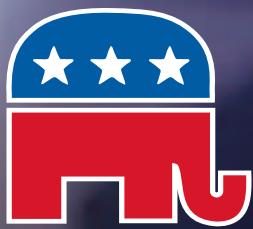
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E-mail (very important): _____

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Vote Republican!



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CITY OFFICES

City of Carlsbad
Claude "Bud" Lewis - Mayor
Mark Packard - City Council
Matt Hall - City Council
Lorraine Wood - City Clerk
Harold "Mac" Mc Sherry - City Treasurer

City of Del Mar
Laura De Marco - City Council
Jerry Finnell - City Council

City of Encinitas
Thomas Brown - City Council
Doug Long - City Council

City of Escondido
Lori Holt Pfeiler - Mayor
Marie Waldron - City Council
Dick Daniels - City Council

City of Oceanside
Jerry Kern - City Council
Rocky Chávez - City Council

City of San Marcos
F.H. "Corky" Smith - Mayor
Mike Preston - City Council

City of Solana Beach
Deanne Borer - City Council

City of Vista
Morris Vance - Mayor
Bob Campbell - City Council
Judy Ritter - City Council

SCHOOL DISTRICTS

Miracosta Community College Board
Rodolfo "Rudy" Fernandez - Area 1
Gregory Post - Area 2

Palomar Community College Board
Christopher Smith

Carlsbad Unified School District
Lisa Rodman
Josephine Lewis
Mark Tanner

Oceanside Unified School District
Emily Ortiz Wichmann

San Marcos Unified School District
Cyndy Minnery

Vista Unified School District
Patty Anderson
Jim Gibson

Escondido Union High School Board
Tina Pope
Pam Grosso
Jon Petersen

San Dieguito Union High School Board
Stephen Cochran

Bonsall Union School District
Lou Riddle
Timothy Coen
Bill Bryant

Del Mar Union School District
Steve Mc Dowell
Martha Murphy
Annette Easton

Encinitas Union School District
Maureen "Mo" Muir

Escondido Union School District
Joan Gardner
Marv Gilbert

Rancho Santa Fe School District
Scot Cheatham
Carlie Headapohl

Solana Beach School District
Jeff Busby

WATER DISTRICTS

Leucadia Waste Water District
David Kulchin
Tracy Peterson

Questhaven Municipal Water District
Phyllis Jean Issac - Division 1
Elizabeth Wood - Division 3
Blake Issac - Division 5

Rincon Del Diablo Water District
John Hinrichs - Division 3
Gregory Quist - Division 1

Vallecitos Water District
Trish Hannan - Division 2

Valley Center Municipal Water District
Randy Haskell - Division 2
Merle Aleshire - Division 5

Santa Fe Irrigation District
John Ingalls - Division 3
Michael Hogan - Division 4
Augustus Daddi - Division 5

Vista Irrigation District
Paul Campo - Division 1

FIRE DISTRICTS

Deer Springs Fire Protection District
Robert Winje
Frank Donnelly
Bruce Tebbs

Rancho Sante Fe Fire Protection District
Thomas Hickerson
John Tanner

Valley Center Fire Protection District
William Lee Palmer
Weaver Simonsen
Mel Schuler

Vista Fire Protection District
Read Miller
Richard Hemenez

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Gordon Tinker
Milton Davies
Daniel Goldberg

Palomar Pomerado Health Board
Ted Kleiter
Bruce Krider

Tri-City Healthcare Board of Directors
Larry Schallock

Valley Center Parks & Recreation
Fran DeWilde

Rancho Sante Fe Community Services
John Tanner
Ronald McMahon
Whispering Palms Community Services
John Mirza

San Dieguito Community Planning Board
Donald Willis
Chaco Clotfelter
Ira Epstein
Thomas Hickerson
Laurel Lemarie
Bill Schlosser

Valley Center Community Planning Board
Eric Laventure
David Montross

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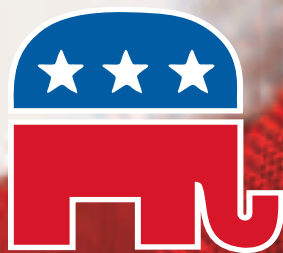
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Representative



Republican Party of San Diego County Official Voting Guide **Official Republican Candidates**



Arnold Schwarzenegger
Governor

Tom McClintock
Lt. Governor

George Plescia
State Assembly District 75

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

- Richard "Dick" Mountjoy** **US Senate**
- Darrell Issa** **49th Congressional District**
- Brian Bilbray** **50th Congressional District**
- Duncan Hunter** **52nd Congressional District**
- John "Woody" Woodrum** **53rd Congressional District**
- Dennis Hollingsworth** **State Senate District 36**
- Mark Wyland** **State Senate District 38**
- Larry "Jake" Kincaid** **County Superior Court Judge**
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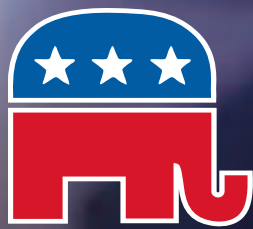
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www.SanDiegoRepublicans.org



Vote Republican!



Please bring this flyer to your polling place on Election Day! Official Republican Candidates for Important Local Offices.

CITY OFFICES

City of Escondido
Lori Holt Pfeiler - Mayor
Dick Daniels - City Council
Marie Waldron - City Council

City of Poway
Mickey Cafagna - Mayor
Betty Rexford - City Council

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board
Deana Weeks - District 1
Rick Alexander - District 2
Bill Garrett - District 3
Arkan Somo - District 5

Miracosta Community College Board
Rodolfo "Rudy" Fernandez - Area 1
Gregory Post - Area 2

Palomar Community College Board
Christopher Smith

Poway Unified School District
T.J. Zane
Jeff Mangum
Penny Ranftle

Ramona Unified School District
Rodger Dohm
William "Bill" Jenkin
Bob Stoodly

San Diego Unified School District
Michael "Mike" McSweeney

Escondido Union High School Board
Tina Pope
Jon Petersen
Pam Grosso

Grossmont Union High School Board
Robert Shield
Shari Groce
Jim Kelly

San Dieguito Union High School Board
Stephen Cochrane

Del Mar Union School District
Martha Murphy
Annette Easton
Steve McDowell

Escondido Union School District
Marv Gilbert
Joan Gardner

Lakeside Union School District
C. Keith Hildreth
Harold Hilliker
Kevin Howe

San Pasqual Union School District
D. Matt Marschall
Darlene Hansen

Rancho Santa Fe School District
Scot Cheatham
Carlie Headapohl

Solana Beach School District
Jeff Busby

WATER DISTRICTS

Rincon Del Diablo Water District
Gregory Quist - Division 1
John Hinrichs - Division 3

Valley Center Municipal Water District
Randy Haskell - Division 2
Merle Aleshire - Division 5

Santa Fe Irrigation District
John Ingalls - Division 3
Michael Hogan - Division 4
Augustus Daddi - Division 5

FIRE DISTRICTS

Lakeside Fire Protection District
Peter Liebig
Emad Bakeer

Rancho Sante Fe Fire Protection District
Thomas Hickerson
John Tanner

San Diego Rural Fire Protection Board
J.R. "Randy" Terry
Will Eastwood

Valley Center Fire Protection District
Mel Schuler
William Lee Palmer
Weaver Simonsen

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Grossmont Healthcare Board
Hikmat Shammass

Palomar Pomerado Health Board
Ted Kleiter
Bruce Krider

Rancho Sante Fe Community Services
Ronald McMahan
John Tanner

Whispering Palms Community Services
John Mirza

Lakeside Community Planning Board
Mark Turvey
Anton Botter
Julie Bugbee
Chad Enniss
Glenn Inverso
Emad Bakeer

Ramona Community Planning Board
William "Bill" Jenkin
Dennis Grimes
Beverly Ragsdale
Beverly Maes

San Dieguito Community Planning Board
Ira Epstein
Thomas Hickerson
Laurel Lemarie
Bill Schlosser
Donald Willis
Chaco Clotfelter

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Vote on Tuesday, November 7th

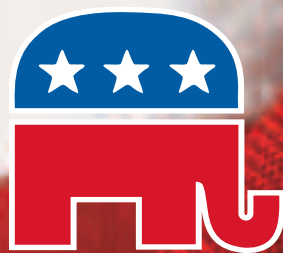
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Republican Party of San Diego County Official Voting Guide **Official Republican Candidates**



Arnold Schwarzenegger
Governor

Tom McClintock
Lt. Governor

Michael "Mike" McSweeney
San Diego Unified School District

Bring this to your polling place on Election Day!

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- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

- Richard "Dick" Mountjoy** **US Senate**
- Brian Bilbray** **50th Congressional District**
- Blake Miles** **51st Congressional District**
- Duncan Hunter** **52nd Congressional District**
- John "Woody" Woodrum** **53rd Congressional District**
- Dennis Hollingsworth** **State Senate District 36**
- Ralph Denney** **Assembly District 76**
- Jean Roesch** **Assembly District 79**
- Larry "Jake" Kincaid** **County Superior Court Judge**

City of San Diego Initiatives

Vote YES on B
Mayor Jerry Sanders' Reform Plan. Requires future city pension benefit increases to go to the people for a vote.

Vote YES on C
Mayor Jerry Sanders' Reform Plan. Reduce costs and improve quality for city services.

California State Initiatives (partial listing)

- Vote YES on Prop 1A**
Make sure gas taxes are used for roads.
- Vote YES on 83**
Stop sexual predators with Jessica's Law.
- Vote NO on 84**
California Republican Party recommends voting no on this bond.
- Vote YES on 85**
Require parents be informed before termination of a minor's pregnancy.
- Vote NO on 86**
Another tax increase.

- Vote NO on 87**
Tax increase that will RAISE GAS PRICES.
- Vote NO on 88**
Tax increase on your home.
- Vote NO on 89**
Tax increase that will kill California jobs.
- Vote YES on 90**
Stop government from taking people's property without proper compensation. Vote YES!
- Prop 1B - YES • Prop 1C - NO • Prop 1E - YES**

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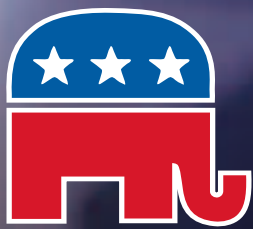
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CITY OFFICES

City of Chula Vista
Cheryl Cox - Mayor

City of Coronado
Peter Fagan - City Council

City of Imperial Beach
John Perno - City Council
Lorie Bragg - City Council

SCHOOL DISTRICTS

San Diego Unified School District
Michael "Mike" McSweeney

San Diego Community College Board
Andy Hollingworth - District C

Southwestern Community College Board
G. Michael German - Seat 2
Jorge Dominguez - Seat 5

Sweetwater Union High School District
Jim Cartmill - District 1
Archie McAllister - District 3
Ed Herrera - District 5

South Bay Union School District
Chris Brown

Chula Vista Elementary School District
Larry Cunningham - District 5

San Ysidro School District
Tim Gomez
Yolanda Hernandez

WATER DISTRICTS

Otay Water District
Larry Breiffelder - Division 1
Gary Croucher - Division 3

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Bonita-Sunnyside Fire Protection District
Joanne Stonecipher
Thomas Pocklington

San Diego Rural Fire Protection Board
Will Eastwood
J.R. "Randy" Terry

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Ken Byrd
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Harriet Taylor
Alan Sachrison

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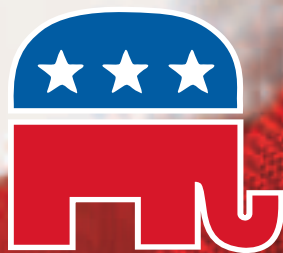
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Official Republican Candidates



Arnold Schwarzenegger
Governor

Tom McClintock
Lt. Governor

Joel Anderson
State Assembly District 77

Bring this to your polling place on Election Day!

Republican Candidates for State Offices

Bruce McPherson Secretary of State

Chuck Poochigian Attorney General

Tony Strickland Controller

Claude Parrish Treasurer

Steve Poizner Insurance Commissioner

Michelle Steel Board of Equalization

Richard "Dick" Mountjoy **US Senate**

Brian Bilbray **50th Congressional District**

Blake Miles **51st Congressional District**

Duncan Hunter **52nd Congressional District**

Dennis Hollingsworth **State Senate District 36**

Larry "Jake" Kincaid **County Superior Court Judge**

City of San Diego Initiatives

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Vote YES on Prop 1A

Make sure gas taxes are used for roads.

Vote NO on 87

Tax increase that will RAISE GAS PRICES.

Vote YES on 83

Stop sexual predators with Jessica's Law.

Vote NO on 88

Tax increase on your home.

Vote NO on 84

California Republican Party recommends voting no on this bond.

Vote NO on 89

Tax increase that will kill California jobs.

Vote YES on 85

Require parents be informed before termination of a minor's pregnancy.

Vote YES on 90

Stop government from taking people's property without proper compensation. Vote YES!

Vote NO on 86

Another tax increase.

Prop 1B - YES • Prop 1C - NO • Prop 1E - YES

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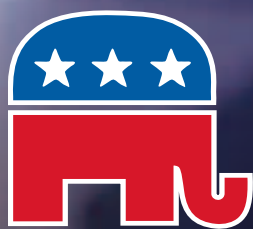
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CITY OFFICES

City of El Cajon
Mark Lewis - Mayor
Gary Kendrick - City Council

City of La Mesa
Jim Stieringer - Mayor
Mark Arapostathis - City Council
Ernest Ewin - City Council
Eldon "Bud" Vogt - City Treasurer

City of Santee
Brian Jones - City Council
John Mirto - City Council
Hal Ryan - City Council

SCHOOL DISTRICTS

Grossmont-Cuyamaca Community College Board
Deana Weeks - Seat 1
Rick Alexander - Seat 2
Bill Garrett - Seat 3
Arkan Somo - Seat 5

Palomar Community College Board
Christopher Smith

Southwestern Community College Board
G. Michael German - Seat 2
Jorge Dominguez - Seat 5

Borrego Springs Unified School District
Margaret Orenyak

Mountain Empire Unified Board of Trustees
Ralph Davis - Area 1
Kenneth Northcote - Area 3
Beryl Buchanan - Area 4
Danny Nunez - Area 5

Poway Unified School District
Penny Ranfile
Jeff Mangum
T.J. Zane

Ramona Unified School District
William "Bill" Jenkin
Rodger Dohm
Bob Stody

San Diego Unified School District
Michael "Mike" McSweeney

Warner Unified School District
Karen Willat
David Bantz

Grossmont Union High School Board
Shari Groce
Robert Shield
Jim Kelly

Julian Union High School Board
David Carey
Stacy Peyakov
Mark Bakken

Sweetwater Union High School Board
Jim Cartmill - District 1
Archie McAllister - District 3
Ed Herrera - District 5

Alpine Union School Board
Eric Wray
Louis Russo
Matt Schumsky

Cajon Valley Union School District
Jill Barto

Julian Union School District
Susan Slaughter
Joy Booth

Lakeside Union School District
C. Keith Hildreth
Harold Hilliker
Kevin Howe

San Pasqual Union School District
D. Matt Marschall
Darlene Hansen

Chula Vista Elementary School District
Larry Cunningham - District 5

Dehesa School District
Cynthia White
Kimberly Pike
Chuck Huskey

La Mesa-Spring Valley School Board
Penny Halgren
Bob Duff
Emma Turner
Rick Winet

San Ysidro School District
Tim Gomez
Yolanda Hernandez

Santee School District
Barbara Ryan - District 1
James Towle - District 3
Allen Carlisle - District 5

WATER DISTRICTS

Borrego Water District
Roger Anderson
Richard "Dick" Walker

Canebrake County Water District
Carl Mc Kenney
Paul Deschamps

Helix Water District
DeAna Verbeke - Division 2
James Lewanski - Division 4

Lakeside Water District
John Belleau - Division 2
Frank Hilliker - Division 3

Otay Water District
Larry Breittfelder - Division 1
Gary Croucher - Division 3

Padre Dam Municipal Water District
Jim Maletic - Division 1
Andy Menshek - District 3
Patricia Cannon - District 5

Ramona Municipal Water District
Jim Robinson - Division 4

Riverview Water District
Mark Godwin
Gale Ruffin

FIRE DISTRICTS

Alpine Fire Protection Board
Jim Easterling
Steve "Kosmo" Kramer
Martin Marugg

Borrego Springs Fire Protection District
Richard Anson
Robert Kenneth Moore

East County Fire Protection District
Gilbert Mastro
Merritt Strickland

Julian-Cuyamaca Fire Board
Bent Koch

Lakeside Fire Protection District
Peter Liebig
Emad Bakeer

Pine Valley Fire Protection District
Benjamin Tulloch
Franklin Whiteley

San Diego Rural Fire Protection Board
Will Eastwood
J.R. "Randy" Terry

San Miguel Fire Protection District
Tom Clark
Richard "Rick" Augustine

SPECIAL DISTRICTS

Grossmont Healthcare Board
Hikmat Shammis

Palomar Pomerado Health Board
Bruce Krider
Ted Kleiter

Borrego Springs Park & Community Services
Dennis Russell

Jacumba Community Services
Rick Johnson

Alpine Community Planning Board
Brad Bailey
Jim Easterling
Louis Russo
Matt Schumsky
Chuck Taylor
David Waitley

Boulevard Community Planning Board
Nazar Najor

Campo/Lake Morena Community Planning Board
Jean Bates
Debra Ford
Richard Northcote
Walt Palmer

Crest Community Planning Board
Pat Ulm

Dehesa Community Planning Board
Richard White

Descanso Community Planning Board
John Elliott

Harbison Canyon Community Planning Board
Jack Vandover

Jamul/Dulzura Community Planning Board
Randy White
Janice Grace
Janet Mulder

Lakeside Community Planning Board
Julie Bugbee
Anton Botter
Emad Bakeer
Glenn Inverso
Mark Turvey
Chad Enniss

Pine Valley Community Planning Board
Cherry Diefenbach
Terry Glardon
Carol Johnson

Potrero Community Planning Board
Gordon Hammers
Mary Johnson
Thell Fowler

Ramona Community Planning Board
William "Bill" Jenkin
Beverly Ragsdale
Beverly Maes
Dennis Grimes

Valle de Oro Community Planning Board
John Hewicker
Donald Fitchett

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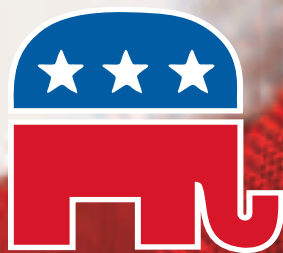
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Republican Party of San Diego County Official Voting Guide

Official Republican Candidates



Arnold Schwarzenegger
Governor



Michael "Mike" McSweeney
San Diego Unified School District



Shirley Horton
State Assembly District 78

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Republican Candidates for State Offices

- Tom McClintock** Lt. Governor
- Bruce McPherson** Secretary of State
- Chuck Poochigian** Attorney General
- Tony Strickland** Controller
- Claude Parrish** Treasurer
- Steve Poizner** Insurance Commissioner
- Michelle Steel** Board of Equalization

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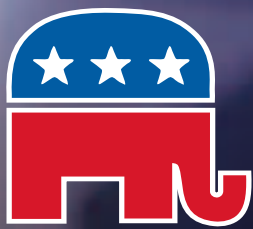
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Otay Water District

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Joanne Stonecipher

San Diego Rural Fire Protection Board

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Will Eastwood

San Miguel Fire Protection District

Tom Clark
Richard "Rick" Augustine

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Hikmat Shammass

Jamul/Dulzura Community Planning Board

Randy White
Janet Mulder
Janice Grace

Spring Valley Community Planning Board

Marilyn Wilkinson

Sweetwater Community Planning Board

Harriet Taylor
John Taylor
Rick Blacklock
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Filed 03/09/2009

Page 2 of 9

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Your Official Orange County Republican Party Endorsements...



Arnold Schwarzenegger



“Schwarzenegger has brought a pragmatic flair to bureaucratic and partisan Sacramento. And he’s engineered real solutions to some of the state’s most pressing problems. This act deserves a sequel, and Schwarzenegger deserves another term in office.”

Los Angeles Daily News
October 1, 2006



Secretary of State
Bruce McPherson



Insurance Commissioner
Steve Poizner



Treasurer
Claude Parrish



Controller
Tony Strickland



Attorney General
Chuck Poochigian



Tom McClintock

Orange County is McClintock Country!

Tom McClintock is California's #1 Taxpayer Advocate, who led the fight to repeal the Car Tax, and...

- ✓ Will fight to slash government bureaucracy
- ✓ Restore fiscal accountability
- ✓ Stop wasteful deficit spending

Experience we know and trust!

Tom McClintock for Lieutenant Governor!

“Despite all the happy talk out of Sacramento in recent months, the long-term budget picture is best described as grim.

This is why more than ever California needs a passionate fiscal conservative in the bully pulpit.

McClintock could not be more suited for the role.”

San Diego Union-Tribune
October 17, 2006

Proposition 90 is proudly endorsed by:



- California Republican Party
- California Republican Assembly
- California Congress of Republicans
- Howard Jarvis Taxpayers Association
- National Tax Limitation Committee
- California Taxpayer Protection Committee
- National Association of Independent Business
- Fullerton Concerned Taxpayers
- The Orange County Register
- Senator Tom McClintock
- Congressman Ed Royce
- Congressman John Campbell
- Assemblywoman Lynn Daucher
- Assemblyman Chuck DeVore
- Assemblyman Todd Spitzer
- Assemblywoman Mimi Walters
- Former Assemblywoman Pat Bates
- Supervisor Chris Norby
- Supervisor Jim Silva
- Treasurer John Moorlach

*partial list

Protect Our Homes — Stop Eminent Domain Abuse **YES** on Proposition 90

Proposition 90 will stop government from seizing homes, small businesses, churches and other private property and turning them over to private developers.

It is wrong for government to take one person's private property and turn it over to another private party, simply to increase tax revenues. Proposition 90 stops this outrageous and un-American practice.

Assemblywoman Mimi Walters
Honorary State Chair
YES on 90/Protect Our Homes Committee



Join these trusted organizations and leaders in opposing Proposition 86

- Governor Arnold Schwarzenegger
- Orange County Taxpayers Association
- Huntington Beach Chamber of Commerce
- Newport Beach Chamber of Commerce
- Howard Jarvis Taxpayers Association
- National Tax Limitation Committee
- Tom McClintock, State Senator
- Chuck DeVore, Assembly Member
- Dennis Mountjoy, Assembly Member
- Mimi Walters, Assembly Member

"I support efforts to curb smoking, but Proposition 86 isn't really about that. Only 10% of the \$2.1 billion in new taxes goes to anti-smoking programs. The rest goes to special interests promoting the measure and to state programs where there is little assurance the money won't be wasted. Now is not the time to saddle Californians with billions in new taxes."

Governor Arnold Schwarzenegger

NoProp86.org

No on Proposition 86

Who

really

benefits from

Prop. 86?



Stop the \$2.1 billion tax hike. Ninety percent goes to special interests, state bureaucracies, and no-bid contracts. Only 10% for anti-smoking programs.

No on Proposition 87

Higher taxes. Higher gas prices. Less money for schools and public safety.



A \$4 billion oil tax increase equals higher gas prices.

Proposition 87 lets a new bureaucracy (50 political appointees) spend with no results required. Join the California Chamber of Commerce in voting “No”!

Case 1:08-cv-01953-RJL-RMC Document 39-22 Filed 03/09/2009 Page 8 of 9

Yes on Prop. 83

“Jessica’s Law”

Jessica’s Law will...

- Ensure that all child predators who molest children under the age of 14 are put in prison with a mandatory minimum sentence of 15 years or 25 years to life.
- Require sex offenders serve their entire sentence.
- Electronically monitor convicted sex offenders for life.
- Create a 2,000 foot “predator-free” zone around schools and parks to prevent sex offenders from living near where our children learn and play.

Yes on Prop. 85

“Protect our daughters”



- ✓ No young girl should undergo any invasive medical procedure performed secretly by an unknown person at an unknown location.
- ✓ Any other surgical procedure performed on a minor child requires not only the notification but the consent of a parent.

Prop. 85 — It just makes sense


No on Prop. 89

Say “no” to new taxes

- Creates a slush fund for negative political ads
- Takes your tax dollars to fund extreme liberal candidates

Join these California organizations in opposing Prop. 89...



- California Taxpayers’ Association
- Howard Jarvis Taxpayers Association
- National Tax Limitation Committee
- National Taxpayers Union
- Orange County Taxpayers Association

A silhouette of a long wooden pier extending into the ocean at sunset. The sky is a bright orange and yellow, and the water is dark. Several people can be seen walking along the pier. A building is visible on the left side of the pier.

The Orange County Republican Party
urges your support for these local candidates...



“ RasmussenReports.com is the site that is talked about at the highest levels of government. ”
- Senator Bill Frist

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Most Say Political Donors Get More Than Their Money's Worth

Monday, February 09, 2009

[Email to a Friend](#)

Fifty-seven percent (57%) of American adults say political donors get more than their [money](#) back in terms of favors from members of Congress.

Just 16% disagree, and 26% are not sure in the latest Rasmussen Reports national telephone survey.

At the same time, 68% say most business leaders contribute to political campaigns primarily because the government can do so much to help or hurt their business. Only eight percent (8%) disagree.

Among business managers in the private sector, 83% say business leaders give primarily because of concern about what the government can do to their business. But those same business leaders are less likely than anybody else to think that donors get their money's worth: 56% think donors get a good return on investment, while 34% do not.

(Want a free [daily e-mail update](#)? Sign up now. If it's in the news, it's in our polls).

Data released yesterday shows that [Americans strongly believe elected officials meet with regulators to help their friends and hurt their opponents](#). Taken together, these figures suggest that most Americans view the political fund-raising process as something like an extortion scheme where those with business before the government can be shaken down legally. [Rod Blagojevich was recently removed from office as governor of Illinois based upon similar allegations](#).

Americans also tend to believe that governors and members of [Congress](#) are a relatively cheap date. Most (51%) say you can influence an official for less than \$50,000 in contributions. That figure includes 29% who say the price of influence is less than \$10,000. At the other extreme, only 18% believe it takes more than \$100,000 to buy or rent influence.

Upper income Americans are more likely than those with lower incomes to say you can influence a congressman or governor for \$50,000 or less. Business managers are more likely to say the price of influence tops \$100,000.

Forty percent (40%) of Americans say it should be against the law for elected officials to receive *any* campaign contributions, but another 40% disagree. Republicans are a bit more receptive to this idea than Democrats, and business managers favor it by a 41% to 37% margin. Those with higher incomes are less receptive to the concept than those who earn less than \$40,000 annually.

Americans are also evenly divided on the question of whether new campaign [finance](#) laws are needed. Forty-three percent (43%) say yes, but 42% say all that's required is to enforce the laws already on the books. A plurality of Democrats favor new laws, a plurality of Republicans favor enforcement, and those not affiliated with either major party are evenly divided. [Earlier surveys have shown that there is little support for public funding of campaigns](#).

It should be emphasized that these views do not have a partisan twist to them. Despite the highly publicized tax troubles faced by recent [Obama](#) appointees, [those appointed by the incoming administration are on balance seen as no more or less ethical than earlier appointees](#). The president himself receives good marks for ethics, with 43% saying he is more ethical than most politicians. Another 31% say he is at least as ethical as most politicians.

Overall, the [president continues to earn high job approval ratings](#) although his

Survey of 1,000 Adults
February 5-6, 2009

Do most contributors to Congressional campaigns get more than their money back in terms of favors and special interest legislation?

Yes	57%
No	16%
Not sure	26%

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numbers have slipped in the past week. [Most voters say Congress is doing a poor job.](#)

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Rasmussen Reports is an electronic publishing firm specializing in the collection, publication, and distribution of public opinion polling information.

The Rasmussen Reports [ElectionEdge™](#) Premium Service for Election 2008 offers the most comprehensive public opinion coverage ever provided for a Presidential election.

Scott Rasmussen, president of Rasmussen Reports, has been an independent pollster for more than a decade.

This national telephone survey of 1,000 Adults was conducted by Rasmussen Reports February 5-6, 2009. The margin of sampling error for the survey is +/- 3 percentage points with a 95% level of confidence ([see methodology](#)).

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Dated: March 9, 2009

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

<hr/>)	
REPUBLICAN NATIONAL COMMITTEE,)	
<i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Civ. No. 08-1953 (BMK, RJL, RMC)
)	
FEDERAL ELECTION COMMISSION,)	
<i>et al.</i> ,)	NOTICE
)	
Defendants.)	
<hr/>)	

NOTICE OF FILING UNDER SEAL

Pursuant to the stipulations of the parties (Docket Nos. 34, 35), Defendant Federal Election Commission (“Commission”) hereby submits the following documents under seal:

- (1) The Commission’s Statement of Genuine Issues, including material that was redacted from paragraph 26 of the electronically filed version of that document;
- (2) FEC Exhibits 22, 23, and 24; and
- (3) For the convenience of the Court, one CD containing the Defendants’ Exhibit Volumes (“DEVs”) filed in *McConnell v. FEC*, 251 F. Supp. 2d 176 (D.D.C.), *aff’d* 540 U.S. 93 (2003), that contained material produced under seal in that action by the Republican National Committee and the California Republican Party.

Courtesy copies of the sealed material are being delivered to each Judge’s Chambers, and additional copies are being sent to Plaintiffs’ and Intervenor-Defendants’ counsel by private delivery service.

Respectfully submitted,

Thomasenia P. Duncan (D.C. Bar No. 424222)
General Counsel

David Kolker (D.C. Bar No. 394558)
Associate General Counsel

Kevin Deeley
Assistant General Counsel

/s/ Adav Noti
Adav Noti (D.C. Bar No. 490714)
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FEDERAL ELECTION COMMISSION
999 E Street NW
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(202) 694-1650

Dated: March 9, 2009

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
REPUBLICAN NATIONAL COMMITTEE,)	
<i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Civ. No. 08-1953 (BMK, RJL, RMC)
)	
FEDERAL ELECTION COMMISSION,)	ORDER
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

[PROPOSED] ORDER

Upon consideration of Plaintiffs’ Summary Judgment Motion, Defendant Federal Election Commission’s opposition thereto, and other materials submitted in support thereof and in opposition thereto, it is hereby

ORDERED that Plaintiffs’ Summary Judgment Motion is DENIED.

BRETT M. KAVANAUGH
United States Circuit Judge

RICHARD J. LEON
United States District Judge

ROSEMARY M. COLLYER
United States District Judge

Dated: _____, 2009