## IN UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

VICTORIA JACKSON GRAY ADAMS, et. al.,	) Civil Action No. ) 02-cv-877-KLH-CKK-RJL )
Plaintiffs,	) consolidated with ) 02-cv-582-KLH-CKK-RJL ) (lead case)
-VS-	) and ) 02-cv-581-KLH-CKK-RJL
THE FEDERAL ELECTION COMMISSION et al.,	) 02-cv-633-KLH-CKK-RJL ) 02-cv-751-KLH-CKK-RJL ) 02-cv-753-KLH-CKK-RJL
Defendants.	<ul> <li>02-cv-754-KLH-CKK-RJL</li> <li>02-cv-781-KLH-CKK-RJL</li> <li>02-cv-874-KLH-CKK-RJL</li> <li>02-cv-875-KLH-CKK-RJL</li> <li>02-cv-881-KLH-CKK-RJL</li> </ul>

## **Declaration of Cynthia Brown**

- I, Cynthia Brown, declare as follows:
- 1. I am a registered and qualified voter in Durham, North Carolina.
- 2. For the past twenty years, I have worked with grassroots communities to advocate for the rights of poor and modest income people. From 1995 to 1999, I served on the Durham City Council where I fought to expand the living wage, strengthen the housing code, protect workers on the job, and promote economic development in poorer communities. I have also worked as the executive director for Southerners for Economic Justice based in Durham and in several staff positions, including interim director, for the Southeast Women's Employment Coalition based in Lexington, Kentucky. I have served as the director of a shelter for battered women and as the North Carolina representative for the National Coalition Against Domestic Violence.

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- 3. I ran as a candidate for the United States Senate from North Carolina in the 2002 Democratic primary. I ran in that primary because I believe that people most affected by public policy should have a say and that public policy should be based on human need, not corporate greed.
- I worked hard to raise money for my campaign and I raised approximately \$50,000. Most of my contributions averaged around twenty-five dollars. I collected only a few \$1,000 contributions for my campaign. My base of support consisted of working class people, people of moderate and low income.
- 5. One of my opponents in the Democratic primary was a millionaire and contributed enormous sums of money to his own campaign while raising large sums of money from wealthy contributors around the country. Another opponent also raised large sums of money from wealth contributors.
- 6. I found that, in spite of the money barrier I faced in this election, I could compete effectively, but I could not win without the money. Erskine Bowles, the millionaire candidate, won the primary.
- 7. I would consider running again for the U.S. Senate, but the increases in the hard money contribution limits in the Bipartisan Campaign Reform Act will seriously discourage me from participating as a candidate.
- 8. If I were to run for the U.S. Senate again from North Carolina, I would likely face again a millionaire opponent. Under the increases in the hard money contribution limits, my other opponents would be free to raise up to \$12,000 per individual per election. The people I know can hardly afford to contribute twenty-five

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dollars, let alone \$12,000. There is no way that any candidate like me can compete under these new conditions.

These increases in the hard money contribution limits would effectively 9. eliminate any future campaign I might hope to wage for the U.S. Senate.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

This 4 day of October, 2002.