

IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

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**Declaration of Dr. Thomas A. Caiazzo**

I, Tom Caiazzo, declare as follows:

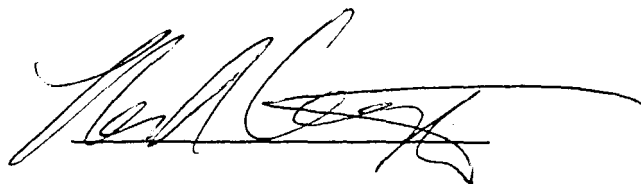
1. I am a political science professor at Collin County Community College in Plano, Texas, and hold a terminal degree in political science. I have taught political science at the community college and university level for the past eleven years.
2. I ran in 2002 as a Republican seeking to represent Texas' third congressional district in the U.S. House of Representatives. I was defeated in the Republican primary, receiving 15.7% of the vote against incumbent Sam Johnson. I raised approximately \$12,000 for this race, while Mr. Johnson has raised over \$500,000.
3. Based upon my experience as a candidate for Representative in the U.S. Congress, I believe that the increased individual contribution limits enacted in the Bipartisan Campaign Finance Reform Act of 2002 (BCRA) will make it more difficult for those without wealth or access to wealth to mount a viable campaign for federal office. Furthermore, the higher contribution limits will increase the influence of the largest campaign donors to such an extent that those who lack wealth, or access to wealth, will be unable to exercise their constitutionally protected right to equal participation in the political process.
4. I believe that money was a deciding factor in my primary loss. In spite of the qualifications listed above and my experience helping other Republican candidate's seek and win elective office, as well as being involved/member of the

5. local Republican Men's', Young, and College organizations], I was not able to compete effectively for the Republican party's nomination. This is largely due to the fact that my opponent outspent me nearly 20 to 1. The fact that 94% of the candidates who raised the most money won their congressional elections in 2000 backs up my own experience.
  
6. My opponent's huge fundraising advantage allowed him to boost his already sizable name recognition, communicate a clear message, and drown out my attempts to communicate with the public. He was able to accomplish this primarily through television and radio advertisements. The incumbent was continuously on the radio and television. Whereas he was on major radio and television stations/frequencies at least fifty times, I ran only one radio ad and one television ad, which was played no more than 10 times. The incumbent also had a plethora of money to flood primary voters with attractive mail-outs and flyers; some primary voters received four in the final week of the campaign.
  
7. Mr. Johnson was able to fund this media barrage by raising money from special interests and wealthy individuals. In addition to \$269,667 from political action committees, over 99% of which came from business PACs, Mr. Johnson has raised \$341,949 from individuals. At least \$119,000 of this individual money came at the \$1000 level or above. In the 2000 election cycle, only 1/9 of 1% of voting age Americans contributed \$1,000 to a candidate for federal office.
  
8. I elected to run a grassroots campaign for Congress. I sought to engage—and raise funds from—average Texans. Therefore I did not hold expensive fundraisers or seek many \$1,000 checks. Instead I held simple bbq and dinner parties. I received only six \$1000 checks, compared with my opponent's 119.

9. Because many of Mr. Johnson's campaign contributions came at the existing limit, it is reasonable to assume that the increased contribution limits enacted as part of BCRA—had they been in effect for my race—would have enabled my opponent to significantly increase his fundraising. Because few of my contributors could afford to contribute even the current limit, the increased limits would not have had a significant impact on my fundraising ability.
10. Therefore, I assert that I would have been less competitive with Mr. Johnson had the increased limits been in effect. BCRA would make it more difficult for grassroots candidates who raise money from average citizens to mount effective campaigns for office.
11. Fundraising concerns generally—and the increases in federal contribution limits contained in BCRA specifically—will play an important role in my decision about whether to run for federal office in the future. The higher contribution limits will make it even more difficult for me to run a grassroots campaign geared towards average Texans and run competitively against a candidate who raises big money from wealthy individuals and special interests.

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 30<sup>th</sup> day of September 2002.

A handwritten signature in black ink, appearing to read 'Thomas A. Caiazzo', written over a horizontal line.

Thomas A. Caiazzo