

IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	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
)	(lead case)
)	
-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	

Declaration of Gail Crook

I, Gail Crook, declare as follows:

1. I am currently retired from a 34-year career in public service. I worked in the budget office at the Air Force Headquarters, for four years as the GS-14 appropriation manager of the annually appropriated \$11 – 18 billion two-year Research, Development, Test and Evaluation appropriation, receiving sustained superior performance evaluations. For approximately seven years I worked national issues for the Department of Defense as a GM 15 budget and security assistance analyst. I receive at least one monetary performance award and two outstanding performance awards. I graduated with a bachelor's degree from Central State University, Edmond, Oklahoma, in the top ten percent of my graduating class and have a master's degree in Business Administration. I paid for my education myself. I have raised three children. I have served my

community in the Air Force Reserves for 24 years and as a non-partisan election official for 12 years. I meet all the qualifications required of candidates for the U.S. Senate: I am over 30 years of age. I have resided in Northern Virginia for more than one year (approximately 20 years) and since I was born in the United States I have been a U.S. citizen for more than nine years.

2. I am currently running as a write-in candidate for U.S. Senate in Virginia.
3. I decided to run for office because I was dissatisfied with the representation being provided by the incumbent, Senator John Warner. As a parent, I feel a responsibility to preserve the environment and improve education for future generations. As a public servant, I feel a responsibility to provide Virginians an opportunity to lobby effectively and to ensure that our laws regarding arms sales are followed. Initially, I approached the Democratic Party to volunteer to work for a candidate who would oppose Sen. Warner. When the *Washington Post* reported, February - March 2002, that there was no one planning to oppose Mr. Warner, I decided to run myself.
4. I contacted the Executive Director of the Democratic Party in Richmond to express my interest in running against Sen. Warner. I was told that if I was to run, the party would not offer me any resources except as required by law.
5. I then contacted the party steering committee. The first question they asked me was "How much money do you have?" They then informed me that I needed to have at least \$1 million in the bank—but really more like \$2 or \$3 million—by May 31st in order to be considered by the Democratic party as a viable candidate

to oppose Sen. Warner. If I was unable or unwilling to raise this money, I would be denied the party nomination.

6. I presented the filing fee and statement of candidacy for the office with the Party's Congressional District 8 Office as required by the Party's call for candidates. My timely and notarized filing document and cashier's check filing fee were refused by the 8th District.

7. I subsequently met with the Chairman of the party in Richmond to discuss my interest in running against Senator Warner and also protested District 8's refusal to accept my timely filing fee or my notarized filing document. The Chairman of the Central Committee in the presence of the Executive Director refused to accept the filing and confirmed the Steering Committee member's guidance that if I were to receive the Democratic Party's nomination for US Senate I would have to raise \$1 million by May 31, 2002.

8. In response to this directive, I sent out between one and two thousand fundraising letters to my family and friends, most of whom are public servants and reservists. I received contributions and pledges of contributions from Virginia, the District of Columbia, Tennessee, Oklahoma, Arizona, Pennsylvania, Louisiana, California, Georgia and Arkansas; yet, I fell well short of the \$1 million target and was not able to secure the party nomination. My average contribution was approximately \$200. My pledges were contingent upon my receiving the party's nomination.

9. Senator Warner, by contrast, has raised over \$3.5 million for his re-election campaign. He has garnered over \$1.3 million in \$1,000 contributions alone. This prodigious fundraising has not only virtually assured that he will win re-election in 2002; it has led Democrats to forgo nominating a challenger. My campaign will be immeasurably more difficult as a write-in candidate than it would have been as a nominated Democratic challenger with the resources and appeal of the party behind me.

10. Based upon my experience as a candidate for U.S. Senate, I believe that the increased individual contribution limits enacted in the Bipartisan Campaign Finance Reform Act of 2002 will make it more difficult for those without wealth or access to wealth to mount a viable campaign for office. If the new, higher, limits had been in place for this election cycle, Sen. Warner would likely have raised even more money. His 1,314 \$1,000 donors would have been able to double their contributions. The price of entry for the Democratic nomination—set by the party steering committee at \$1 million—would likely have gone up as well. Given that most of my contributors could not afford to give at the current \$1,000 limit, the increased caps would not have benefited my candidacy. Not only would the increased limits have hurt my ability to compete as a write in candidate, but they would have put me even farther away from earning the Democratic nomination.

11. I believe that the increased contribution limits will increase the influence of the largest campaign donors to such an extent that those like myself who lack monetary wealth, or access to monetary wealth, will be unable to exercise our constitutionally protected right to equal participation in the political process.

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 30th day of September 2002.

A handwritten signature in cursive script, appearing to read "G. Gail Crook". The signature is written in black ink on a white background.

Gail Crook