

IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

VICTORIA JACKSON GRAY ADAMS,	)	Civil Action No.
<i>et. al.,</i>	)	02-cv-877-KLH-CKK-RJL
	)	
<i>Plaintiffs,</i>	)	<i>consolidated with</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

DECLARATION OF DARYL IRLAND

## **Declaration of Daryl Irland**

I, Daryl Irland, declare as follows:

1. I am a twenty-year-old politically active college student. I attend school at Collin County Community College in Plano, Texas. I have voted in several local, state, and federal elections since turning of age.
2. I was recently involved in a campaign for U.S. House of Representatives, supporting Tom Caiazzo against Sam Johnson in Texas' third district Republican primary.
3. We ran a grassroots campaign chiefly supported by college students and other young people. My primary role in the campaign was to canvas district three voters. This included planning neighborhood campaign routs and soliciting votes. In addition I was involved in coordinating several campaign events to stimulate voter interest.
4. Most of Dr. Caiazzo's supporters—including myself—could not afford to contribute \$1,000 to the campaign, so we gladly donated our time instead. When we reached out to voters and potential volunteers, we asked them to contribute small sums of money and to volunteer for the campaign.

5. Our opponent, on the other hand, was able to raise large sums for money from many wealthy contributors. The result was that Mr. Johnson's campaign took in approximately 40 times more money than ours.
  
6. This fundraising deficit proved to be a hurdle we could not overcome. Our opponents' huge financial advantage severely impaired our chances of being successful. Money does not guarantee success but certainly creates the appearance of credibility. Not only did his financial edge allow Mr. Johnson to overwhelm our message with paid mailings and advertisements, but the media also treated fundraising as an appropriate measure of candidate viability, not treating our candidacy seriously. Ultimately, this helped to create a self-fulfilling prophecy: Mr. Johnson was able to win easily in part because the media (and therefore the public) believed he would win easily.
  
7. Based upon my experience as a volunteer on a congressional campaign, I believe that raising the individual contribution limit to two thousand dollars will only serve to widen the gap between the incumbent and the first time candidate. This belief is confirmed by U.S. PIRG's new report *Contribution*

*Limits and Competitiveness*, which demonstrates that higher contribution limits (or none) lead to greater margins of victory for incumbents.

8. Increasing the individual contribution limits will also further limit the options of the voter and discourage young voters such as myself from being involved in the political system. The process of a political campaign is both fascinating and eye opening. I would not trade that year of my life for anything, but I doubt that I would invest the time again knowing now that money alone can decide elections.

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 'Daryl Irland', written over a horizontal line.

Daryl Irland