

IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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VICTORIA JACKSON GRAY ADAMS, <i>et. al.,</i>	)	Civil Action No.
	)	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

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**Declaration of Victor Morales**

I, Victor Morales, declare as follows:

1. I have been a member of Crandall city council and a teacher for 20 years.
2. I ran for the position of U.S. Senator from Texas in 1996. I secured the Democratic nomination and received 44% of the vote in the general election against incumbent Phil Gramm, in spite being significantly outspent. I raised approximately \$900,000 in the last four months of this campaign. Overall, approximately 87% of the funds I raised came in contributions less than \$100.

3. In 1998, I ran against incumbent Congressman Pete Sessions in Texas's fifth congressional district. In spite of being outspent about \$1 million to about \$800,000, I again received 44% of the vote.
  
4. I ran in 2002 against Dallas Mayor Ron Kirk in the U.S. Senate Democratic primary. In spite of being outspent by more than \$1 million I forced a runoff, which I lost—after again being badly outspent—59-41.
  
5. Based upon my experience as a candidate for Senator and 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.
  
6. When I first decided to run for office, I knew that money would be the biggest factor. The first state representative that I contacted regarding my campaign made this very clear. His first question was "how much money do you have; how much money can you raise." He didn't ask about my experience or how I stood on the issues, etc. In fact, most of the status quo politicians wouldn't even return my calls because I wasn't perceived as a big money candidate.
  
7. I believe that money was a deciding factor in each of my losses. I traveled around the state of Texas in a pickup truck and ran a grassroots campaign. My

dedication and articulation of ideas that appealed to average Texans allowed me to remain competitive despite a huge financial disadvantage. However, in the end, Senator Gramm's, Representative Sessions's, and Ron Kirk's warchests were simply too much to overcome.

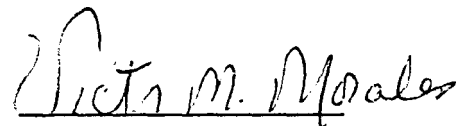
8. My opponents' huge fundraising advantage allowed them to boost their already sizable name recognition, communicate a clear message, and drown out my attempts to communicate with the public. For my Senate race, the money comes in because obviously you can't meet 3 million people. One commercial in Texas costs \$600,000. Papers don't take you seriously unless you have money. You also need the money for signs, bumper stickers, phone calls, all the basics. My campaign used no consultants, no machinery. The reaction I got was "Who does he think he is—a schoolteacher running for office."
9. My opponents each funded their campaigns through contributions from special interests and wealthy individuals. Mr. Kirk raised more than \$1.8 million through contributions of \$1,000 or more for the 2002 Senate race.
10. I ran my campaigns by driving a pickup truck throughout the state and appealing to average Texans. My campaign and my fundraising were geared towards lower and middle income families. At the beginning, I would simply ask folks to contribute \$15 to fill my truck with gas. For the 2002 campaign, I received only \$12,000 in contributions at or above \$1,000.

11. Because many of my opponents' 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 races—would have enabled my opponents to significantly increase their 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.
  
12. Therefore, I assert that I would have been less competitive in each of my campaigns had the increased limits been in effect. BCRA has made it more difficult for grassroots candidates who raise money from average citizens to mount effective campaigns for office.
  
13. I also believe that the increased contribution limits will further alienate my supporters, specifically those that contribute in small amounts. During my 1996 campaign, I ran into two of my former students walking out of the post office. They said "Mr. Morales, we're so proud of you. When we see you on TV, we say—that's our government teacher. We were going to send you \$25 each, but we didn't because we thought "what's \$25, he needs millions." The big money system has already alienated people like my former students; and the contribution limit increases will only make this worse.
  
14. 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 3<sup>rd</sup> day of October, 2002.

A handwritten signature in cursive script that reads "Victor M. Morales". The signature is written in black ink and is positioned above the printed name.

Victor Morales