



missions, and the Targeted Community Initiative, a program to help residents of historically disadvantaged communities achieve marked improvements in their lives. In recognition of these efforts, I received a Public Service Excellence Award from then-President Bill Clinton in 1997, and an Alumni Achievement Award from the Kennedy School of Government at Harvard University in 1999. Prior to my tenure as County Chairman, I was elected to a four-year term on the Orange County Commission in 1986. Before that, I had worked for almost 10 years as a banker at Winter Park Federal in Winter Park, Florida.

3. I ran as a Democratic candidate in the 1986 election for Orange County Commissioner, and in the 1990 election for County Chairman. I ran on a non-partisan ballot in my 1994 campaign for County Chairman, which was the result of an effort I led to make all county offices non-partisan. The local Democratic party, which is called the Orange County Democratic Executive Committee ("County Committee"), did not provide significant assistance in my 1986, 1990 or 1994 campaigns because, by itself, the County Committee did not have the resources to do so. In fact, in my experience the County Committee has actually viewed local campaigns primarily as opportunities to raise funds for itself. The County Committee does get involved in "coordinated campaigns" which support candidates across the board, for example by working on get-out-the-vote or absentee ballot efforts. The national Democratic party was not involved in my county campaigns. In my races for County Chairman in 1990 and 1994, my campaign ran television ads to support my candidacy.

4. I was the Democratic candidate in the 2000 general election to represent Florida's Eighth Congressional district, which was an open-seat race. I had no primary opponent. In the Republican primary in early September 2000, Bill Sublette and Ric Keller were the top vote getters. There was a run-off election between these two in early October 2000, which Mr. Keller

won. In the November 2000 general election, Mr. Keller received about 51% of the votes cast, and I received about 49%. My general consultant in the race was Terry Beckett, who had also managed my 1990 and 1994 campaigns for County Chairman and served as my Chief of Staff from 1991 to 1994.

5. National, state and local party committees all played important roles in my 2000 Congressional race. The national committees do get very involved when they feel they have a real shot at winning an important Congressional seat. In my 2000 race, the Democratic party committees felt they had a good chance to pick up a seat in a strongly Republican-leaning district that had been represented by Bill McCullum for many years. So they were very involved through the Democratic Congressional Campaign Committee ("DCCC"). The DCCC sent experts to help with various parts of the campaign, such as turning out particular categories of voters. The DCCC also provided television ads to the Florida State Democratic Party ("State Party"), which the State Party then ran in support of my campaign. The State Party played a supporting role in my campaign, including through its running of the "coordinated campaign." The County Committee was also involved in the coordinated campaign.

6. Interest groups were also an important factor in the 2000 Congressional election in Florida's Eighth District. The Florida Women's Vote project of EMILY's List provided significant funding for the Democratic coordinated campaign described above. At least one other interest group offered to provide campaign support if I would agree to vote a certain way on their issues. I let them know what my position was, but they wanted me to change it somewhat and I did not agree to that. I understand that Mr. Keller received assistance from the Club for Growth and the National Rifle Association. In addition, interest groups ran electioneering ads in support of all three major candidates, as will be discussed below.

7. Based on my experience in campaigns for federal and local office, including the television advertising we ran in my races for County Chairman and Congress, I am familiar with political campaign ads. No particular words of advocacy are needed in order for an ad to influence the outcome of an election.

8. Television and radio electioneering advertising by political parties and interest groups played an important role in the 2000 Congressional election in Florida's Eighth District. Most of these ads praised or criticized a candidate or her actions, then asked the audience to "tell" or "ask" the candidate to do something. In my view, these ads were candidate-driven, not issue-driven. The only significant difference between these ads and the candidate ads was how they were financed. The candidate ads were financed with federal funds ("hard money"), whereas I understand that the party and interest group ads were financed at least in part with non-federal funds ("soft money"). Like the candidate ads, the party and interest group ads were intended to and did influence the outcome of the election.

9. Political parties on both sides of the campaign ran electioneering ads directed at influencing the outcome of the 2000 Congressional election. The DCCC ran television advertising through the State Party in order to take advantage of the more favorable hard money-soft money allocation ratios enjoyed by state parties. Storyboards representing six State Party ads, which as I recall were run in the two months prior to the general election, are attached as Exhibit 1 to this Declaration. I understand that these storyboards and all others attached to this Declaration were provided by the Brennan Center for Justice, which had obtained them by arrangement with the Campaign Media Analysis Group. In general, these ads praise me, my record or my positions and or criticize Mr. Keller or Mr. Sublette or their records or positions. They are clearly intended to influence the election results.

10. The Florida Republican Party also ran television ads in the 2000 Congressional campaign. Storyboards representing five of these ads, which I understand were run in the two months prior to the general election, are attached as Exhibit 2 to this Declaration. Most of these ads criticize me, my record or my positions. They are clearly intended to influence the election result.

11. The National Republican Congressional Committee also ran television ads in the 2000 Congressional campaign. Storyboards representing two of these ads, which as I recall were run in the two months prior to the general election, are attached as Exhibit 3 to this Declaration. These ads criticize me, my record or my positions. They are clearly intended to influence the election result.

12. Interest groups also ran electioneering ads that affected the outcome of the 2000 Congressional election, particularly the result in the Republican run-off between Mr. Keller and Mr. Sublette. Mr. Keller was not well known at this time, and important newspapers had endorsed Mr. Sublette, who had significant relevant experience. Based on my observations, effective attack ads run against Mr. Sublette by the Club for Growth were the deciding factor in the run-off. In fact, the Club for Growth itself stated that it had this effect on the election result.

13. The Florida Women's Vote project of EMILY's List also ran a television ad in the campaign. A storyboard representing this ad, which as I recall was run in the two months prior to the general election, is attached as Exhibit 4 to this Declaration. The ad praises my record on gun safety and ends with the line: "Tell Linda Chapin to continue fighting." This ad is clearly intended to influence the election result. Based on my observations, EMILY's List is not particularly interested in gun control issues. However, they are interested in supporting pro-choice female candidates like me, and this ad serves that purpose.

14. The Republican Leadership Council also ran television ads in the 2000 Congressional campaign. Storyboards representing two of these ads, which as I recall were run just before the elections between Mr. Keller and Mr. Sublette, are attached as Exhibit 5 to this Declaration. These ads accuse Mr. Keller of acting "like a liberal." They were clearly intended to influence the election result.

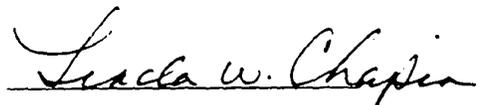
15. The Club for Growth ran television ads in the 2000 Congressional campaign. Storyboards representing two of these ads, which I understand were run just before the elections between Mr. Keller and Mr. Sublette, are attached as Exhibit 6 to this Declaration. The first of these ads compares Mr. Keller's positions on tax issues very favorably with those of Mr. Sublette. The second ad praises Mr. Keller's positions on tax and spending issues and criticizes mine, ending with the line: "Remember, only a tax cutter like Ric Keller can compete with liberal Linda Chapin." In addition, I recall that Club for Growth ran a third ad just before the general election. I understand this ad was run on local cable television. The ad featured a man getting ready for work and describing all the aspects of his life as to which I had purportedly raised taxes. It ended with the man saying that he would need to work harder if I was in Congress. These ads were clearly intended to influence the election results, and I believe that they did influence the election results in the 2000 race.

16. Federal candidates appreciate interest group electioneering ads like those described above that benefit their campaigns, just as they appreciate large donations that help their campaigns. I appreciated the ads run by EMILY's List on my behalf. In general, candidates in the midst of a hard-fought election like mine appreciate any help that comes their way.

17. I support the restrictions on the use of soft money to affect federal elections in the new McCain-Feingold legislation. Large political donations are a problem at every level of

government because they give the donors too large a role in the outcome of campaigns, and they ~~have the potential to influence the conduct of elected officials once the campaign is over. Even~~ the perception of such influence damages the belief of citizens in the democratic system. I think the most egregious thing of all is the lack of disclosure with regard to interest groups that spend a great deal of soft money on ads designed to affect election results, particularly when they adopt names such as "The Committee to Avoid Cutting the Tails Off of Puppy Dogs." Often the public--and candidates who are being attacked--can't tell who these groups are, where they come from, or where they get their money. Of course, the candidates these groups are helping know.

18. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.



Linda W. Chapin

Executed on this 12 day of September, 2002

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