

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

REDACTED

REPUBLICAN NATIONAL COMMITTEE, <i>et al.</i> ,)	
Plaintiffs,)	
v.)	
FEDERAL ELECTION COMMISSION,)	Civ. No. 02-874 (CKK. KLH. RJL)
Defendant.)	

DECLARATION OF FRANCES G. BEINECKE

Frances G. Beinecke, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am the Executive Director of the Natural Resources Defense Council ("NRDC"). NRDC has designated me pursuant to Federal Rule of Civil Procedure 30(b)(6) to respond in the form of an affidavit to the subpoena served upon NRDC on July 2, 2002 by Plaintiffs in the matter of *Republican National Committee, et al. v. Federal Election Commission*, Civ. No. 02-874 (the "Subpoena").

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3. As a nonprofit 501(c)(3) organization, NRDC files Form 990s with the Internal Revenue Service. NRDC's Form 990s filed in years 1999-2001 are attached as Exhibit

1. NRDC does not file any disclosure forms with the Federal Election Commission.

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9. NRDC applies to and receives grants from various foundations and the government. In fiscal year 2000, approximately 96 foundations awarded NRDC grants totaling approximately \$7,512,100, which represents approximately 19% of NRDC's total income for that year. In addition, NRDC received approximately 9 government grants totaling

approximately \$759,600 or approximately 2% of its total income in fiscal year 2000. In fiscal year 2001, approximately 112 foundations awarded NRDC grants totaling approximately \$10,287,800, which represents approximately 18% of NRDC's total income for that year. In addition, NRDC received approximately eleven government grants totaling approximately \$679,300 or approximately 1% of its total income in fiscal year 2001. In fiscal years 2000 and 2001, the W. Alton Jones Foundation, The Energy Foundation, the John D. and Catherine T. MacArthur Foundation, and The Pew Charitable Trust were among the foundations awarding the largest grants to NRDC. Attached as Exhibit 3 is a sample proposal submitted by NRDC to a foundation in year 2000. NRDC does not publicly disclose the amount of money awarded to it by any specific foundation.

10. NRDC receives major gifts from individuals. In fiscal year 2000, NRDC received approximately \$9,652,000 from individuals. This included approximately 222 gifts from major donors. Major gift contributions from individuals, including major donors, represented 25% of NRDC's total income for fiscal year 2000. In fiscal year 2001, NRDC received approximately \$14,036,600 from individuals. This included approximately 366 gifts from major donors. Major gift contributions from individuals, including major donors, represented 25% of NRDC's total income for fiscal year 2001. The largest major gift received in fiscal year 2000 was \$2 million and in fiscal year 2001 \$1.8 million. NRDC does not publicly disclose the precise amount of money donated to it by any specific individual.

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30. I declare under penalty of perjury that the foregoing is true and correct.

Executed on Aug. 27 2002

Frances G. Beinecke
FRANCES G. BEINECKE