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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

REDACTED

REPUBLICAN NATIONAL COMMITTEE,)
MIKE DUNCAN, as a member and as Treasurer)
of the Republican National Committee,)
REPUBLICAN PARTY OF COLORADO,)
REPUBLICAN PARTY OF OHIO,)
REPUBLICAN PARTY OF NEW MEXICO,)
DALLAS COUNTY (IOWA) REPUBLICAN)
COUNTY CENTRAL COMMITTEE,)
)
Plaintiffs,)
)
v.)
)
FEDERAL ELECTION COMMISSION,)
)
Defendant.)

Civ. No. 02-874
(CHK, KPH, RAL)

DECLARATION OF DEBRA CALLAHAN

1. My name is Debra Callahan. I am the President of the League of Conservation Voters ("LCV"), a Maryland non-profit corporation, and have held this position since January, 1996. This Declaration is based on my review of documents, discussions with senior members of the LCV staff and my personal knowledge.

2. I am submitting this Declaration in response to, and in complete fulfillment of, a subpoena for documents and testimony that the Republican National Committee served on LCV on June 14, 2002, in the above-captioned case ("RNC Subpoena"). This Declaration provides information about LCV, a corporation tax exempt under section 501(c)(4), its account organized under Section 527 of the Internal Revenue Code, and its federal Political Action Committee. Unless otherwise indicated, The term "LCV" refers to those three entities and the information set forth in this Declaration is for the time period January 1, 1995 through the present.

3. LCV is not a party to this litigation.

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4. As required by law, LCV files reports with the Federal Election Commission ("FEC"), with the Internal Revenue Service ("IRS"), and with state agencies that regulate solicitations of contributions. These reports contain information on the source and amount of donations to LCV and on the amount and purpose of disbursements by LCV. LCV's reports filed with the FEC are available to the public at the FEC's offices and on the FEC's web site.

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5.

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6.

7. LCV hosts two annual dinners at which federal office holders often speak or receive awards. Periodically, it also hosts smaller events for its major donors at which federal office holders frequently speak. These smaller events often occur in connection with the celebration of Earth Day, April 22. Other small events with elected officials are held on an occasional basis, usually only once or twice a year. Attached as exhibit B are invitations for the LCV annual dinners of 1999, 2000, and 2001.

8. Attached to this Declaration as Exhibit C are authentic copies of the Forms 990 for the years 1998, 1999, and 2000, which have been filed with the IRS by the 501(c)(4) membership organization. Information on specific donors has been removed from these copies pursuant to applicable law. These forms contain detailed information about operational expenses incurred during the applicable years. The total LCV expenses on activities not reportable to the Federal

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Election Commission for 2000 are \$3,705,688, for 2001 are \$3,565,189 and as of June 30, 2002 are \$2,079,872.

9. LCV, the nonprofit membership corporation, is exempt from federal income tax pursuant to section 501(c)(4) of the Internal Revenue Code. LCV's tax exempt status has not changed since January 1, 1995.

10. From time to time, LCV officers, Board members, employees, and agents meet with federal officeholders to discuss LCV, its political program and environmental policy issues. LCV officers, Board members, employees, and agents meet with federal candidates to discuss candidates' records and positions on issues of environmental policy.

11. In one state LCV has three employees who contact state or local officeholders or candidates. In other states, as part of LCV's assistance to local environmental organizations, its employees occasionally contact state or local officeholders or candidates. In addition, LCV is a member of a consortium of environmental organizations, and as part of the consortium's activities has occasionally asked its members to contact state officeholders. The consortium does not engage in activity on behalf of or in opposition to candidates for public office. LCV occasionally writes letters to governors concerning environmental policy issues.

12. LCV engages in minimal lobbying of federal officeholders. On information and belief, it spends far less than 1% of its budget on lobbying activities. While LCV Board members occasionally contact Members of Congress in support of environmental policy initiatives, LCV's principal lobbying activities are signing on to letters prepared by coalitions of environmental organizations and informing Members of Congress of important votes on environmental policy which are likely to be included in the Congressional Scorecard LCV publishes. Authentic copies of letters indicating that a Congressional vote may be scored are attached as Exhibit D.

13. LCV's federal political committee, LCV Action Fund, makes contributions to federal candidates which are reflected in LCV's publicly available reports filed with the FEC. In 2000, LCV Action Fund made cash and in-kind contributions of \$87,839.52; in 2001 LCV Action Fund did not make any cash or in-kind contributions; as of June 30, 2002, LCV Action Fund has made cash and in-kind contributions of \$17,342.24. In addition, LCV has contributed amounts estimated to be less than \$5,000 per year to other federal political committees; these contributions are also fully disclosed on the FEC reports. LCV has not made contributions to state or local candidates or officeholders or to national, state or local political parties.

14. LCV has not engaged in "electioneering communications" as that term is defined in the Bipartisan Campaign Reform Act.

15. LCV expressly advocates the election or defeat of some federal candidates regardless of their party affiliation. Environmental Champions is an LCV program which publicly promotes the outstanding records of environmental leaders and provides them with financial support;

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many of the Environmental Champions are the beneficiaries of positive independent expenditure campaigns. The Dirty Dozen is the name given to the program which highlights candidates for Congress whose very presence in Congress represents a threat to environmental protection. In 2000, LCV spent \$4,559,174.31 on independent expenditures; it did not spend any funds on independent expenditures in 2001; as of June 30, 2002, it has spent \$418,623.79 on independent expenditures. Scripts for several Dirty Dozen television ads are attached as exhibit E. In addition, more detailed information about its independent expenditure activities are available from LCV's publicly available reports filed with the FEC.

16. To the extent set forth below, LCV engages in the following activities referenced in the lettered subparagraphs of Subject Matters of Testimony number 15 of the RNC Subpoena:

A. LCV Action Fund makes cash contributions to federal candidates as reflected in LCV's publicly available reports filed with the FEC. During 2000 it gave cash contributions of \$75,000; it gave no cash contributions in 2001; as of June 30, 2002 has given \$11,500. It does not contribute to state or local candidates.

B. LCV makes in-kind contributions to a small number of federal candidates, as reflected in LCV's publicly available reports filed with the FEC. In 2000 LCV made in-kind contributions of \$12,840; it made none in 2001; as of June 30, 2002 it has made in kind contributions of \$5,933. It does not provide its employees or field staff to political parties.

C. LCV provides fundraising assistance to a limited number of federal candidates, and it provides fundraising advice and assistance to some state environmental organizations that support state and local candidates.

D. LCV does not conduct candidate training or education programs.

E. As part of its political program, LCV conducts political opinion polls, demographic research, and opposition research.

F. LCV does not develop lists of voters for its use in electoral activities; it does, however, buy lists of voters from voter file vendors for use in its independent expenditure campaigns.

G. LCV publishes the National Environmental Scorecard. LCV Scorecards dating back to 1979 are publicly available on LCV's web site. From time to time, LCV publishes Presidential Report Cards. Authentic copies of Scorecards for 1999, 2000, and 2001 are attached as Exhibit F.

H. LCV has engaged in very little voter registration. In one election in 1996, it hired an organizer to encourage voter registration.

I. As part of its political program, LCV conducts voter identification activities.

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J. As part of its independent expenditure campaigns, LCV engages in get out the vote activities including mailing GOTV messages to voter lists, running radio ads, and calling its members. LCV spent \$4,559,174.31 on all of the activities of its independent expenditure campaign in 2000; no money was spent for this purpose in 2001; and as of June 30, 2002, LCV has spent \$418,623.79 on independent expenditure activities.

L. LCV is unable to determine without an unreasonable expenditure of effort whether it ever supported or opposed a ballot measure during the time period at issue in this Declaration. At most, it would have done so in 1995 in one state.

M. As part of its independent expenditure campaigns, LCV occasionally produces printed express advocacy materials such as door hangers. All such activities are reflected in LCV's publicly available reports filed with the FEC.

N. LCV produces certain token items for its members such as bumper stickers and pins, but none of these items refer to specific candidates.

O. LCV has not engaged in any absentee ballot programs.

P. LCV occasionally contacts its members by telephone or Email with regard to environmental policy issues and in some cases as part of its independent expenditure campaigns. LCV telephones members in support of or opposition to federal candidates. The expenses of LCV endorsements to members are reflected as in-kind contributions or independent expenditures on its reports filed with the FEC. As part of its independent expenditure campaigns, LCV has contacted potential voters about candidates; these costs are reported to the FEC and reflected in the total costs of independent expenditure campaigns cited in this declaration.

Q. LCV has run ads on environmental policy issues. Authentic copies of such ads are attached as Exhibit G.

R. As stated above, LCV contributes to federal candidates and files with the FEC publicly available reports of these contributions. LCV solicits its members for direct contributions earmarked for federal candidates.

S. LCV raises funds for its account organized under section 527 of the Internal Revenue Code. LCV, the 501(c)(4) membership corporation, has received contributions from organizations qualified under 501(c)(3) of the Internal Revenue Code. See numbered paragraph 5 above. In previous years, LCV has made grants averaging less than \$5,000 per year to 501(c) organizations which work on local environmental policy issues.

17. LCV uses both its PAC and its treasury funds to communicate with its members by the methods set forth in paragraph 6 above.

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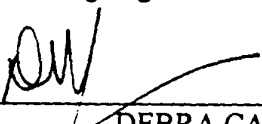
18. LCV endorses federal candidates to its members and to the public. It does not endorse state or local candidates. Attached as Exhibit H are lists of candidates endorsed by LCV in the 1996, 1998 and 2000 elections.

19. While the subpoena was directed to the League of Conservation Voters, the Republican National Committee has also sought information concerning the League of Conservation Voters Education Fund ("LCVEF"). LCVEF, a nonprofit corporation created under the laws of the District of Columbia and tax exempt under section 501(c)(3) of the Internal Revenue Code, operates independently from LCV. The mission of LCVEF is to help build the grassroots power of the environmental movement and to involve citizens in policy decisions at all levels of American governance. It develops innovative campaign and communication technologies, builds pro-conservation coalitions, and trains environmental leaders on how to be strategic and successful participants in the democratic process.

20. As President of LCVEF I am familiar with each of the following documents and able to state that each document is what it purports to be. A general description of its mission and programs is attached as Exhibit I and its 1998-1999 report and information on 2001 donors are attached as Exhibit J. LCVEF conducts training programs described in Exhibit K. LCVEF conducts public opinion polls on the public's attitudes toward environmental issues and releases the results to the public; examples of state and national polls and reports are attached as Exhibit L. LCVEF has helped to organize e-action networks in 17 states; a research report on these networks is attached as Exhibit M and an example of a program in a particular state is attached as Exhibit N. On Earth Day 2000, LCVEF launched its Vote Environment Campaign; copies of those materials are attached as Exhibit O. LCVEF publishes several educational handbooks; one, attached as Exhibit P explains a program to make more effective use of membership lists. LCVEF's web site provides issue briefing reports and has been used to generate comments on environmental regulations; exemplary materials are attached as Exhibit Q.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 3/31/02



DEBRA CALLAHAN