

CONFIDENTIAL DEPOSITION OF PAUL R. HUARD
CONDUCTED ON THURSDAY, SEPTEMBER 26, 2002

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COPY

IN THE UNITED STATES DISTRICT COURT
THREE JUDGE COURT, WASHINGTON, D.C.

MCCONNELL, et al.,

Plaintiffs,

v.

Case No. 02-0582

FEDERAL ELECTION COMMITTEE,

CONSOLIDATED CASES

et al.,

Defendants

Deposition of
PLAINTIFFS NATIONAL ASSOCIATION OF MANUFACTURERS BY
PAUL R. HUARD
INDIVIDUALLY AND AS 30(b)(6) WITNESS



Washington, D.C.

Thursday, September 26, 2002

9:10 a.m.

Job No: 12-5430

Pages 1 - 121

Re:  LEGALINK,  MyMinha Mas Bengade, TRF 2-557-7400
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CONFIDENTIAL: RD

what "T" or "S"

A No. the

person that wrote Judge Kollar-Kotelly cites The thing
Huard Deposition at 58 on page
to me. 252 of her opinion for the propo-
sition that The Coalition spent
MR. SC \$5 million. Page 58 of The Huard rk as
Deposition does not say this,
Huard 9 a r nonetheless page 66 states that ask
The Coalition raised "five to
force to T six million" and is enclosed 5. And
herewith.

I think my ferent

ads were r

(There marked for
identification a ript.)

BY MR. SCHWARZ:

Q Lookir from
NAM files, do yo rough
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"Flag" and somet

A Uh-huh

Q And we es of
different ads th

A Yes.

Q So do least
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1 CONFIDENTIAL - COUNSEL ONLY - PAUL R. HUARD

2 wouldn't even hazard a guess.

3 Q Did you participate in any fund-raising
4 for The Coalition?

5 A Yes.

6 Q And I'm not certain I need to know the
7 names, Tom tries to stop us from asking about names,
8 but I'm not sure if you are right or wrong on that,
9 but I don't know that I need to know the names. But
10 speaking generally, what were the sources from which
11 you sought money to support the activities of The
12 Coalition?

13 A Members of the National Association of
14 Manufacturers.

15 Q And those would be American corporations?

16 A For the most part.

17 Q Do you have a ballpark figure about how
18 much money you were able to raise from your members?

19 A Two million.

20 Q Do you have a ballpark idea about how much
21 The Coalition altogether raised?

22 A Five to six million.

23 Q Again, I'm not asking for a specific name,
24 but what was the largest gift you obtained from a
25 American corporation to support The Coalition's