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2 IN THE UNITED STATES DISTRICT COURT

3 THREE JUDGE COURT, WASHINGTON, D.C.

4

5 MCCONNELL, et al.,

6 Plaintiffs,

7 v. Case No. 02-0582

8 FEDERAL ELECTION COMMITTEE, CONSOLIDATED CASES

9 et al.,

10 Defendants

11

12

13 C O N F I D E N T I A L

14 Deposition of

15 PLAINTIFFS NATIONAL RIFLE ASSOCIATION AND NATIONAL

16 RIFLE ASSOCIATION POLITICAL VICTORY FUND BY

17 MARY ROSE ATKINS

18 INDIVIDUALLY AND AS 30(b)6

19 Washington, D. C.

20 Thursday, September 12, 2002

21 8:10 a.m.

22

23 Job No: 12-5007

24 Pages 1 - 33

25 Reported by: Amy L. Massengale, RPR

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Deposition of PLAINTIFFS NATIONAL RIFLE ASSOCIATION
AND NATIONAL RIFLE ASSOCIATION POLITICAL VICTORY FUND BY

MARY ROSE ATKINS, held at the offices of:

WILMER, CUTLER & PICKERING

2445 M Street, Northwest

Eighth Floor

Washington, D. C. 20037

(202) 663-6000

Pursuant to agreement of counsel, before
Amy L. Massengale, Registered Professional
Reporter and Notary Public in and for the District
of Columbia.

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A P P E A R A N C E S

ON BEHALF OF THE INTERVENORS:

FREDERICK SCHWARZ, ESQUIRE

BRENNAN CENTER FOR JUSTICE

161 Sixth Avenue

New York, New York

(212) 998-6730

ON BEHALF OF THE NATIONAL RIFLE ASSOCIATION:

DAVID H. THOMPSON, ESQUIRE

COOPER & KIRK

1500 K Street

Suite 200

Washington, D. C. 20005

(202) 220-9659

ALSO PRESENT: Laura Moulton, Brennan Center for

Justice

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C O N T E N T S

EXAMINATION OF MARY ROSE ATKINS PAGE

By Mr. Schwarz 5

E X H I B I T S

(No exhibits were marked.)

7

1 MARY ROSE ATKINS

2 P R O C E E D I N G S

3 PLAINTIFFS NATIONAL RIFLE ASSOCIATION AND NATIONAL RIFLE

4 ASSOCIATION POLITICAL VICTORY FUND BY MARY ROSE ATKINS

5 having been duly sworn, testified as follows:

6 EXAMINATION BY COUNSEL FOR THE INTERVENORS

7 BY MR. SCHWARZ:

8 Q So, Ms. Atkins, how long have you been

9 employed at NRA?

10 A Since 1975.

11 Q In what department or departments have you

12 worked?

13 A Currently, I am in the Fiscal Division and

14 previously, it was in the Federal Affairs Division.

15 Q Federal which?

16 A Federal Affairs.

17 Q In Federal Affairs what sort of work did

18 you do?

19 A Secretary. That was back in 1975.

20 Q Was working at the NRA your first job?

21 A No.

22 Q It should be looking at what your age

23 looks like, but where did you work before that?

24 A Pharmaceutical manufacturers.

25 Q And in the last four years, what have been

1 MARY ROSE ATKINS

2 your responsibilities at NRA?

3 A Basically, budgeting for the institute for
4 the legislative action, the keeping of the books,
5 the administrative duties of fund-raising for the
6 institute and the Political Victory Fund and
7 treasury of the PAC.

8 Q Treasury of the PAC?

9 A Yes.

10 Q You are on sort of both sides of the
11 fence, the ILA side, the PAC side?

12 A Yes.

13 Q And the NRA side also, do you actually --
14 maybe I wasn't listening properly. Do you do fiscal
15 work for NRA as opposed to ILA and the PAC?

16 A No, I don't.

17 Q Can you tell me how many -- let's take the
18 year 2000. How many donors were there to the
19 Victory Fund?

20 A Approximately maybe over 200,000.

21 Q Comparing to in that year precisely,
22 according to a document you gave us, 3.2 million,
23 3.241598 million? You gave us --

24 MR. THOMPSON: Do you mean members, you
25 said 3.24.

1 MARY ROSE ATKINS

2 BY MR. SCHWARZ:

3 Q This was donors -- you have ILA and NRA
4 donors for the year and it says 3.241598 for
5 members?

6 A That includes members who contribute
7 besides just --

8 Q You use the word "donor" and "member"
9 differently?

10 A Yes.

11 Q But the 3,200,000 number would include
12 both donors and members for the NRA and ILA?

13 A Correct.

14 Q And does that compare -- in the case of
15 the Victory Fund, you just talk about donors; you
16 don't talk about members, correct?

17 A Correct. They are members, though, but we
18 call them donors.

19 Q They are members of the Victory Fund?

20 A They are members of NRA.

21 Q Do some people give money to the Victory
22 Fund that are not members of the NRA?

23 A Yes.

24 Q Roughly how many people do you think give
25 money to the Victory Fund who are not members of the

1 MARY ROSE ATKINS

2 NRA?

3 A I'm not quite sure, but a small percentage

4 or a small percent.

5 Q What would small be?

6 A Less than 1 percent.

7 Q In the year 2000, again, how many people

8 gave \$1,000 or more to the Victory Fund?

9 A I don't recall, but 2,000 maybe.

10 Q Okay. Of the people who gave \$1,000 or

11 more to the Victory Fund, how many of those did not

12 give \$1,000 or more to NRA/ILA?

13 A I don't remember the paperwork I gave you

14 but -- so I don't recall.

15 Q I'm asking these questions because the

16 things I'm asking about aren't in the paperwork you

17 gave me.

18 A Could you repeat the question?

19 MR. SCHWARZ: Read it back.

20 (The Reporter read the pending question.)

21 THE WITNESS: I really don't know at this

22 point.

23 BY MR. SCHWARZ:

24 Q But there would be some?

25 A There would be some, but I couldn't give

1 MARY ROSE ATKINS

2 you a number.

3 Q Let me go back to the answer about how
4 many people gave \$1,000 or more to the Victory Fund
5 where you said it was about 2,000, and that was in
6 the year 2000, correct?

7 A I believe that was what you asked me.

8 Q That is what I asked, yeah.

9 A Uh-huh.

10 Q If you were to estimate for 1999, how many
11 people gave \$1,000 or more to the Victory Fund?

12 A I don't recall.

13 Q Do you have anything at all that you can
14 think of?

15 A I really don't remember a number.

16 Q In 2001, what is your best estimate of how
17 many people gave \$1,000 or more to the Victory Fund?

18 A I don't recall, but I would assume it
19 would be less than the year 2000.

20 Q Just as the number who gave money to the
21 NRA, \$1,000 or more, was less in 2001 than it was in
22 2000?

23 A I would assume.

24 Q For the same reason?

25 A It is an off election year.

1 MARY ROSE ATKINS

2 Q So let's pick an election year. Earlier,
3 1998, how many people gave \$1,000 or more to the
4 Victory Fund in 1998, approximately?

5 A I really don't remember that year.

6 Q Now, let's focus on people who gave \$1,000
7 or more to NRA and ILA but did not give to the
8 Victory Fund, and your chart said there were 1,912
9 such people, correct -- David, do you have your
10 chart?

11 MR. THOMPSON: I don't have the chart.

12 MR. SCHWARZ: Can I show this to you? It
13 has a lot of my notes to it.

14 MR. THOMPSON: You show it to her. I
15 won't look at it.

16 BY MR. SCHWARZ:

17 Q Just look at your chart, look at this
18 document. Did you prepare this document?

19 A No, I didn't. Let's see.

20 Q You certainly didn't prepare my
21 handwriting.

22 A That is correct probably. Yes, I did.

23 Q And what was the --

24 A I didn't look at the numbers, though. I'm
25 sorry.

1 MARY ROSE ATKINS

2 Q I will give it back to you. What data did
3 you look at when you prepared that document? The
4 document is the Bates stamped NRA2074.

5 What data did you look at in order to
6 prepare that document?

7 A Contributor data on our files.

8 Q Do you press a button and get an answer?

9 A We have our Information Services.

10 Q What is Information Services?

11 A Our Information Services manages our
12 contributive database.

13 Q So they push a button and get some
14 information?

15 A Something like that, yeah.

16 Q So this is data that was provided to you
17 by Information Services?

18 A Correct.

19 Q Now, the number you gave us for 2000 was
20 1,912, people who gave?

21 A Okay.

22 Q With respect to those people, and just let
23 me show it to you again, but when it says "did not
24 give to PVF" -- that is the heading of the document
25 you have provided, correct?

1 MARY ROSE ATKINS

2 A Yes, sir.

3 Q And does that mean -- did you intend to
4 mean they gave nothing to the PVF, these individuals
5 who you list, the numbered 1900, whatever you list
6 there.

7 A Yes.

8 Q Okay.

9 MR. THOMPSON: What is the Bates number?

10 MR. SCHWARZ: 2074, NRA2074.

11 BY MR. SCHWARZ:

12 Q So there were, according to the records of
13 this department, 1912 people who gave \$1,000 or more
14 to NRA/ILA but didn't give a penny to the Victory
15 Fund?

16 A That is what I remember as having gotten,
17 yes.

18 Q You would agree, wouldn't you, that there
19 would be lots of reasons why people would give money
20 to the NRA/ILA and not give it to the Victory Fund?

21 A Yes.

22 Q Those reasons could include they didn't
23 like giving money to political funds, that would be
24 one possible reason, right?

25 A Yes.

1 MARY ROSE ATKINS

2 Q Or they agreed with the NRA's general
3 programs on gun safety and hunting and so forth but
4 didn't agree with the NRA's approach to politics;
5 that is another possible reason, correct?

6 MR. THOMPSON: Objection, calls for
7 speculation.

8 BY MR. SCHWARZ:

9 Q You can answer.

10 A I'm not sure what the members would do,
11 but it possibly could be a reason. I don't know.

12 Q Yeah, and you don't know actually the
13 reasons for these people, do you, it is just a
14 number, and you don't know the reasons why they
15 chose to give \$1,000 or more to NRA and ILA but not
16 to the Victory Fund; isn't that correct?

17 A No, I don't know.

18 Q Okay. And indeed, anybody can give up to
19 \$200 under existing law and does not have to have
20 any disclosure made about their donations; isn't
21 that correct?

22 A Could you repeat the question?

23 Q Yes. Are you familiar with the existing
24 law on when disclosure has to be made with respect
25 to someone who has given money to a PAC?

1 MARY ROSE ATKINS

2 A Yes.

3 Q And is there a figure above which you have
4 to make disclosure and below you don't have to make
5 disclosure?

6 A The disclosure is in excess of 200.

7 Q So anybody who was concerned about
8 disclosure could give up to \$200 without having to
9 worry about disclosure, correct?

10 A Yes.

11 Q Now, someone who is worried about
12 disclosure could have lots of possible reasons for
13 that worry, correct?

14 A I don't know.

15 Q You don't know why a person might be
16 worried about disclosure unless they actually talk
17 to you, correct?

18 A Yes.

19 Q Some people just don't like to give
20 information to the government at all; isn't that
21 correct?

22 A That is correct.

23 Q And there are NRA members who are what I
24 might call Libertarians, correct?

25 A I assume there would be.

1 MARY ROSE ATKINS

2 Q And Libertarians are people that just
3 don't like giving any information to the government;
4 isn't that correct?

5 A Possibly. I don't know.

6 Q You don't know, Ms. Atkins, do you, why
7 people choose to give a particular level of money to
8 the NRA or a particular level of money to the
9 Victory Fund; isn't that correct?

10 A I know from certain -- from pulling
11 certain documents that people do not want to have
12 their names disclosed or their occupation disclosed
13 to the Federal Election Commission.

14 Q And are the documents you say you pulled
15 the ones that David was kind enough to give me this
16 morning and that I have in my hand now?

17 A Yes, sir.

18 Q That is the full extent of whatever it is
19 you say you know about why people choose to give
20 various amounts of money to the Victory Fund or the
21 NRA?

22 A Also knowledge from phone calls and
23 talking to my staff and phone calls that they get.

24 Q So let's first talk about the materials
25 that you provided to us this morning.

1 MARY ROSE ATKINS

2 One member said in response to a
3 letter asking for employment information to be
4 provided to the FEC, one member said, quote, you
5 have to ask, but I don't, underlined, have to tell,
6 tell the FEC, I said to go pound sand for freedom,
7 3/31/02.

8 So is that a person that told you
9 just I don't want to give the FEC information,
10 didn't tell you anything more about the reasons,
11 correct?

12 A Right.

13 Q And then another person writes a note at
14 the bottom of a similar letter, the identical letter
15 saying occupation, retiree, but noting under that,
16 quotes, please note, I don't think the FEC should
17 have the power to demand this info, just another
18 example of govt. intruding into our lives, close
19 quotes.

20 Now, that is an example of someone
21 who takes, as I put it earlier, a Libertarian
22 position and just doesn't want to give information
23 to the government, correct?

24 A Could you repeat that?

25 (The Reporter read the pending question.)

1 MARY ROSE ATKINS

2 THE WITNESS: Possibly.

3 BY MR. SCHWARZ:

4 Q Well, let me ask the question a different
5 way.

6 That person doesn't say why they
7 don't want to give information to the government;
8 they just don't like giving information to the
9 government because it is, quotes, intruding into our
10 lives; isn't that correct?

11 A Correct.

12 Q Then the next example is on the same sort
13 of letter asking for employment information and says
14 in handwriting, "I refuse this information. Screw
15 them."

16 That doesn't tell you any reason why
17 the person is refusing the information, does it?

18 A No.

19 Q Then the next piece of paper you handed
20 over to us says -- it is a different form and -- let
21 me see how I can describe it.

22 Look at this form, how can you
23 describe the form so I can say it correctly?

24 A Solicitation.

25 Q Solicitation, okay, this is a solicitation

1 MARY ROSE ATKINS
2 letter and the person is sending in \$39 and it says
3 at the bottom next to occupation and employer,
4 quotes, my contributions to NRA PVF do not and will
5 not exceed \$200 this year (calendar year), which
6 there are some initials that you might want to white
7 out. Okay.

8 That doesn't indicate any reason,
9 does it, for the statement the person is making
10 about what they plan to do with respect to donations
11 to the PVF, correct?

12 A Correct.

13 Q Then I'm skipping over the statistics, but
14 looking at another form, which is like the first
15 three that asks for employment information, the
16 person types in, "If I'm required to fill in any
17 information, please remove me from your mailing list
18 in regards to any future contributions. If this
19 creates a problem, please refund my contribution."

20 Again, that doesn't give any reason
21 the person is saying they don't want to provide the
22 information, does it?

23 A No.

24 Q Now, you have then given us two pages of
25 statistics showing people who gave in one set of

1 MARY ROSE ATKINS

2 statistics, and this is for the year 2000.

3 It shows people who gave \$199 through
4 \$199.99, and the other page shows people who gave --
5 it doesn't show the names of the people, it shows
6 their towns, who gave exactly \$200 to the PVF in the
7 year 2000.

8 Now, with respect to those
9 statistics, one isn't able to tell why the person
10 gave exactly 199 or 199.99 or \$200; you can't tell
11 that from the statistics, can you?

12 A No.

13 Q Indeed, as I questioned you earlier,
14 people could have many reasons for choosing to give
15 a certain amount, even if -- strike that question.
16 I will do another one.

17 Even if, as the handwritten examples
18 that we looked at earlier, and I asked you about
19 earlier, even if a person chose to give 199 or 200
20 because they didn't want the government to know, to
21 get information, as you testified earlier, there are
22 all sorts of reasons why the people may not want the
23 government to have information, correct?

24 A Right.

25 Q In fact, nobody on those handwritten notes

1 MARY ROSE ATKINS

2 said they were worried about any disclosure to the

3 public.

4 What they said they were worried

5 about when they talked about tell the FEC to go away

6 and so forth was just giving it to the government

7 because they indicated they didn't like giving

8 information to the government; isn't that right?

9 A Could you repeat that or rephrase it?

10 Q Well, why don't I strike it.

11 You agreed there are all kinds of

12 reasons why people might want to limit their

13 contributions to the NRA Political Victory Fund,

14 right?

15 A Yes.

16 Q And you can't tell from the statistics

17 anything about people's reasons, correct?

18 A Correct.

19 Q And then I was saying even if a person's

20 reason was that they did not want to make disclosure

21 to the government, there are all sorts of reasons

22 why people might not want to make disclosure to the

23 government, correct?

24 A Correct.

25 Q Those include people that just believe it

1 MARY ROSE ATKINS

2 is a violation of their rights to provide
3 information to the government because the government
4 is, as one of them said, intruding into our lives;
5 isn't that correct?

6 A That is correct.

7 Q Now, all the people who gave \$1,000 or
8 more to the NRA/ILA but didn't give a penny to the
9 PVF could have given \$200 to the PVF, couldn't they?

10 A I believe we ran the report that they did
11 not give to PVF, if I recall correctly.

12 Q Yes, I'm saying -- that is what you
13 testified this chart means, that they gave zero to
14 the PVF.

15 But all of these people could have,
16 if they wanted to, given \$200 to the PVF without any
17 disclosure being made to the government, correct?

18 A Correct.

19 Q Now, you testified that you had, you, Mary
20 Rose Atkins, had received some telephone calls from
21 people about the question of disclosure to the
22 Federal Election Commission, correct?

23 A Yes.

24 Q How many such calls have you received?

25 A I have not received that many. Maybe

1 MARY ROSE ATKINS

2 three that I can recall.

3 Q Okay. And when did you have those? When
4 did you have those three calls?

5 A That would have been back a few years,
6 five, six years ago.

7 Q So you got three calls, and they were five
8 or six years ago?

9 A Yes.

10 Q And none more recently than five or six
11 years ago?

12 A Not for me, no.

13 Q And as you sit here today, can you
14 remember what any of those three people said five or
15 six years ago?

16 A Just approximately, that they will not
17 like their names disclosed for fear that their jobs
18 are being put out there, their occupation and their
19 name.

20 Q So they said I don't want my name
21 disclosed to whom?

22 A To the Federal Election Commission.

23 Q And did any of them in these three
24 conversations that occurred five or six years ago
25 tell you anything else than what you have summarized

1 MARY ROSE ATKINS

2 in that testimony?

3 A Just that they are afraid that sometimes
4 their employer would find out where they gave money.

5 Q And were these people who -- were you
6 talking with them about a particular amount of
7 money?

8 A I don't recall.

9 Q So you don't know whether these are people
10 who were giving \$50 or \$100 or \$200 or \$300?

11 A No.

12 Q And what did you say to them when they
13 made those comments to you?

14 A That they have the right to feel that way.

15 Q Now, you also testified that certain staff
16 people had said something to you at some time on the
17 subject we are talking about today.

18 A Right.

19 Q How many such conversations have you had
20 with staff people in the course of your work?

21 A Quite a few.

22 Q And were those conversations you had in
23 order to prepare for this deposition, or were those
24 conversations you had during the course of your
25 regular work?

1 MARY ROSE ATKINS

2 A Both.

3 Q So when you say "quite a few," give us --

4 MR. THOMPSON: Just so we are clear, these
5 are the conversations with the staff people,
6 they are not the conversations that the staff
7 people have had with the potential donors,
8 right?

9 MR. SCHWARZ: That is a fair point.

10 BY MR. SCHWARZ:

11 Q You don't actually know what conversations
12 your staff people had with any potential donors, do
13 you? You weren't listening in to any conversations?

14 A No.

15 Q How many times in the year 2000, for
16 example, did any staff person make any comment to
17 you relating to the subject of our discussion today?

18 A A handful.

19 Q And a handful means five or less or what?

20 That is a handful, five or less?

21 A Yes.

22 Q Would that be a typical year, or would
23 that be more than most because you had more
24 fund-raising during the year 2000 as an election
25 year?

1 MARY ROSE ATKINS

2 A Could you repeat the question?

3 Q Would 2000 be a typical year, another --

4 you said there was a handful, which is something up

5 to five, or would there be more such conversations

6 in 2000 because NRA was doing more fund-raising in

7 2000 because it was an election year?

8 A I don't know.

9 Q Has there been any year when you have had

10 more than a handful of any such conversations?

11 A Not that I recall.

12 Q In those conversations, have you any idea

13 how much money the person who you say your staff

14 person was referring to was thinking about giving to

15 the Victory Fund?

16 A From my conversations, some people checked

17 to see what their history has been to the PVF so

18 they do not go over the limit, so they --

19 Q So they don't go over the \$200 limit?

20 A Right.

21 Q Did the staff people tell you anything

22 other than I got a call from someone -- what did the

23 staff people tell you in the conversations, the

24 handful of conversations you remember, precisely

25 what did they tell you?

1 MARY ROSE ATKINS

2 A People would call and ask to check their
3 donation to see how much they had given so they
4 don't go over the limit to have their names and
5 occupations disclosed.

6 Q That is all you were told?

7 A Yes.

8 Q Now, you also testified that in addition
9 to these handful of examples during your work,
10 regular work, that to prepare for this deposition,
11 you talked to some people about this subject?

12 A Yes.

13 Q Who did you talk to?

14 A David Thompson, Wayne La Pierre, my staff.

15 Q Well, David Thompson didn't give you any
16 information that helps you provide facts to me, did
17 he?

18 A No.

19 Q And Mr. La Pierre, you don't know what he
20 said in his deposition, so I can't ask you whether
21 he told you anything different than what he told me
22 in his deposition.

23 Did Mr. La Pierre tell you about his
24 being deposed to me last week?

25 A He said he was deposed.

1 MARY ROSE ATKINS

2 Q Did he tell you the subject we are talking
3 about had come up?

4 A No.

5 Q What did Mr. La Pierre say to you about
6 the subject that I questioned him about last week
7 and that I'm questioning you today?

8 A He just said that he has members that
9 don't want to join because of fear of retaliation.

10 Q So he didn't tell you anything more
11 concrete than he told me last week. I don't think
12 La Pierre is relevant to our discussion.

13 You say you also got information from
14 staff people, and were these the same staff people
15 who had made the handful of reports to you that you
16 talked about?

17 A No.

18 Q Which were these staff people?

19 A Grass roots staff.

20 Q And what does "grass roots staff" mean?

21 A Information Services. They answer the
22 phone calls that come in.

23 Q How did you pick out which grass roots
24 staff to talk to?

25 A People who answer the phones.

1 MARY ROSE ATKINS

2 Q You went wandering around the NRA offices

3 to talk to everybody that answers the phones; I

4 can't imagine you did that?

5 A No. No.

6 Q Who did you decide to talk to?

7 A I don't recall their name, but it was an

8 information specialist.

9 Q And she is someone who answers the phone

10 and is sort of a general purpose information

11 specialist for NRA?

12 A Yeah.

13 Q What did this person tell you?

14 A They do get some calls on why we have to

15 disclose our names.

16 Q And is that all she told you?

17 A Yes.

18 Q And you haven't talked to anybody else to

19 prepare for this deposition?

20 A No.

21 Q Major donors, do you have a class of

22 givers called major donors?

23 A ILA does not.

24 Q Does NRA?

25 A I don't recall. I don't know.

1 MARY ROSE ATKINS

2 Q Does the PVF?

3 A No.

4 Q What was the biggest gift given to the PVF
5 in the year 2000?

6 A The biggest gift would have been 5,000.

7 Q You had nobody give a gift larger than
8 5,000?

9 A No.

10 Q Do you accept gifts larger than 5,000?

11 A No.

12 Q Is that a matter of NRA policy not to
13 accept gifts larger than 5,000?

14 A No.

15 Q Suppose somebody came in and said you guys
16 are doing the right thing, I want to give you
17 50,000. What would you say?

18 A Are you talking about the PVF?

19 Q Yes, the PVF can't take more than 5,000?

20 A Correct.

21 MR. THOMPSON: We are trying to give you
22 latitude on the 30(b)(6).

23 MR. SCHWARZ: You are saying she is not a
24 witness for general fund-raising?

25 We are off the record.

1 MARY ROSE ATKINS
 2 (Off-the-record discussion.)
 3 (Signature having not been waived, the
 4 deposition of Mary Rose Atkins was concluded at
 5 8:51 a.m.)

6
 7

8 ACKNOWLEDGMENT OF DEPONENT

9 I, Mary Rose Atkins, hereby certify that I
 10 acknowledge that I have read and examined the
 11 foregoing testimony, and the same is a true, correct
 12 and complete transcription of the testimony given by
 13 me and any corrections appear on the attached Errata
 14 sheet signed by me.

15
 16
 17 _____

18 (DATE)

(SIGNATURE)

19
 20
 21
 22
 23
 24
 25

1 MARY ROSE ATKINS
2 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

3 I, Amy L. Massengale, Registered
4 Professional Reporter, the officer before whom
5 the foregoing deposition was taken, do hereby
6 certify that the foregoing transcript is a true
7 and correct record of the testimony given; that
8 said testimony was taken by me stenographically
9 and thereafter reduced to typewriting under my
10 supervision; and that I am neither counsel for
11 or related to, nor employed by any of the
12 parties to this case and have no interest,
13 financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 15th day
16 of September, 2002.

17 My commission expires:
18 July 14, 2006.

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21 NOTARY PUBLIC IN AND FOR THE
22 DISTRICT OF COLUMBIA

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1 MARY ROSE ATKINS

2 E R R A T A S H E E T

3 IN RE: MCCONNELL, ET AL., VS. FEC, ET AL.

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