

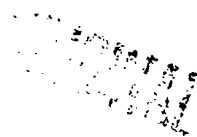
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DISTRICT OF COLUMBIA

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SENATOR MITCH MC CONNELL, :  
et al., :  
Plaintiffs, : Civil Action Number  
vs. : 02-0582  
FEDERAL ELECTION COMMISSION, : (CKK, KLH, RJL)  
et al., :  
Defendants. :



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REPUBLICAN NATIONAL COMMITTEE, :  
et al., :  
Plaintiffs, : Civil Action Number  
vs. : 02-0874  
FEDERAL ELECTION COMMISSION, : (CKK, KLH, RJL)  
et al., :  
Defendants. :

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CONFIDENTIAL DEPOSITION OF E. BLAISE HAZELWOOD

Washington, D.C.

Saturday, September 21, 2002

ACE-FEDERAL REPORTERS, INC.

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1 Deposition of ELIZABETH BLAISE HAZELWOOD, called  
2 for examination pursuant to notice of deposition, on  
3 Saturday, September 21, 2002, in Washington, D.C.,  
4 at the offices of Covington & Burling,  
5 1201 Pennsylvania Avenue NW, at 8:20 a.m., before  
6 SARA EDGINGTON, RPR, CRR, a Notary Public within and  
7 for the District of Columbia, when were present on  
8 behalf of the respective parties:

9

10 BOBBY R. BURCHFIELD, ESQ.  
11 Covington & Burling  
12 1201 Pennsylvania Avenue NW  
13 Washington, DC 20044  
14 202-662-5350  
15 On behalf of Plaintiff Republican National  
16 Committee

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--continued--

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1 APPEARANCES (CONTINUED):

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Republican National Committee

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310 First Street SE

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Washington, DC 20003

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On behalf of Plaintiff Republican National

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Committee

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KRISAN PATTERSON, ESQ.

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ERIC J. MOGILNICKI, ESQ.

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On behalf of Defendant-Intervenors

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1 A 1995, I think.

2 Q Now, that campaign management college, is  
3 that something that you had further contact with or  
4 interaction with?

5 A Not that specific campaign management  
6 college.

7 Q Can you tell me your current employer and  
8 your job title?

9 A It's the Republican National Committee,  
10 and my title is political director.

11 Q Can you tell me a little bit about what  
12 you do as political director?

13 A I oversee the grassroots department. I  
14 oversee the field and the victory programs and  
15 surrogate programs, team leader programs.

16 Q Okay. Can you tell me a little bit about  
17 each of those different fields? Grassroots is more  
18 familiar, but if you could give me a description of  
19 what you mean by "grassroots," that would be  
20 helpful.

21 A Coalitions and outreach.

22 Q So when you say "coalitions," do you mean

1 BY MS. PATTERSON:

2 Q I guess I would like to know if you're  
3 aware, in your experience, of the RNC directing a  
4 state party to run a media advertisement or to buy a  
5 media advertisement.

6 A I generally don't deal with broadcast  
7 media. And so I don't have much experience in it.  
8 Maybe you can -- that's really where -- I just don't  
9 have much experience in it.

10 Q So you're not, in your experience, aware  
11 of that kind of activity?

12 A What do you mean by "directing"?

13 Q In your experience, does the RNC send  
14 state parties -- transfer funds to state parties  
15 asking them to buy media time?

16 A The RNC transfers money to state parties.

17 Q And are you aware of transfers being made  
18 to state parties in connection with requests that  
19 those state parties run media advertisements?

20 A I'm familiar with the parties sending --  
21 transferring money to state parties, uh-huh.

22 Q For that purpose?

1 A Yes; for media broadcasts, uh-huh.

2 Q In your experience, is that something that  
3 happens in a variety of states, or is it generally  
4 targeted?

5 A I don't have enough experience to  
6 speculate on that really.

7 Q As the political director, do you identify  
8 states that are more competitive for federal races?

9 MR. BURCHFIELD: Object to form.

10 THE WITNESS: Again, can you give me an  
11 example?

12 BY MS. PATTERSON:

13 Q Well, for a presidential race -- sorry.  
14 Let me get my timeline right.

15 For Congressional races, is a part of your  
16 job to identify those races where it's a close race?

17 A That's really not a part of my job, to  
18 identify close races.

19 Q Do you treat states -- districts where the  
20 races are close differently than you treat races  
21 where they're not close?

22 A We look at a state and everything that's