



campaign finance reform legislation at both the federal and state levels. Public Citizen and its attorneys have been involved in various capacities, including as party, amicus curiae and counsel, in many cases at all levels in the federal courts involving the constitutionality of such legislation.

Democracy 21 is a non-profit, non-partisan policy organization that works to eliminate the undue influence of big money in American politics and to ensure the integrity and fairness of our democracy. It supports campaign finance and other political reforms, conducts public education efforts to accomplish these goals, participates in litigation involving the constitutionality and interpretation of campaign finance laws, and engages in efforts to help ensure that campaign finance laws are effectively and properly enforced and implemented. Democracy 21 has participated as party, counsel or amicus curiae in many cases in the federal courts involving the constitutionality of the campaign finance laws.

The Campaign Legal Center is a nonpartisan, nonprofit organization that works in the area of campaign finance, election law, and government ethics. The Campaign Legal Center offers nonpartisan analyses of issues and participates in generating and shaping our nation's policy debate about money in politics, disclosure, political advertising, and enforcement issues before the Congress, the Federal Communications Commission, the Federal Election Commission and the IRS. It participates in state and federal court litigation throughout the nation regarding contribution limits, disclosure, political advertising, enforcement issues, and other campaign finance matters. It also participates in rulemaking and

advisory opinion proceedings at the Federal Election Commission to ensure that the agency is properly enforcing federal election laws.

These three organizations seek leave to file a brief as amicus curiae in this case because the case directly implicates issues of fundamental concern to them. The amici believe that their brief may be of assistance to the Court by identifying and concisely discussing critical legal issues that are central to the case and by highlighting the potential consequences of the theories advanced by the plaintiffs. Because the plaintiffs' claims have very far-reaching, nationwide consequences for our campaign-finance system, the amici respectfully suggest that it may be of importance for the Court to consider arguments presented not only by the immediate parties to the case, but also others including proponents of campaign finance reform whose interests are not always congruent with those advanced by the Federal Election Commission.

### **CONCLUSION**

For the foregoing reasons, the three movants respectfully request that their motion for leave to file a brief as amicus curiae be granted, and that the Court order that the accompanying brief be filed in this case.

Respectfully submitted,

/s/Scott L. Nelson

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was served by the Court's ECF system on all parties to this action.

/s/ Scott L. Nelson  
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