

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

PUBLIC CITIZEN, *et al.*,
Plaintiffs,

v.

FEDERAL ELECTION COMMISSION,
Defendant.

Civil Action No: 14-148 (RJL)

**DECLARATION OF KEVIN ZEESE IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

In accordance with 28 U.S.C. § 1746, Plaintiff Kevin Zeese declares as follow:

1. I am one of the signers of the administrative complaint filed with the Federal Election Commission (FEC) against Crossroads GPS at issue in this litigation.
2. The Federal Election Campaign Act (FECA) requires detailed disclosure by political committees, including itemized disclosure of donors who contribute more than \$200 to them. Crossroads GPS has not complied with FECA's political committee organizational, recordkeeping, registration and reporting requirements, and as a result information about the identity of its donors is unavailable to me and other members of the public.
3. I am an attorney with Plaintiff ProtectOurElections.org and am committed to reforming politics and elections. I rely on information about campaign-related spending to evaluate different speakers and messages and to monitor the impact of large expenditures on officeholders and public policy.

4. Based on my work and that of my colleagues, ProtectOurElections.org has studied the extent of money in politics and its corrosive effects, with a particular focus on anonymous funding of political advertising. ProtectOurElections.org supports legislation to ensure greater transparency in campaign financing and in order to support that advocacy we monitor political fundraising and spending and report on it. ProtectOurElections.org has also filed complaints with federal agencies including the FEC, Department of Justice and IRS about campaign finance practices that violate federal laws, and in order to take these actions we need disclosure of political fundraising and spending.

5. I am a citizen of the United States and a registered voter in Maryland. As a registered voter, I am entitled to receive the information that FECA requires political committees and others to disclose to the public, and my informed exercise of my vote is impaired when such information is unavailable.


6. The FEC's dismissal of my administrative complaint against Crossroads GPS injures ProtectOurElections.org and me directly, as we are not receiving the full, accurate, and timely disclosures regarding contributors to Crossroads GPS and other information required under FECA, which we would use in our work if it were available.

7. If the FEC does not faithfully implement FECA's political committee organizational, registration and reporting requirements, ProtectOurElections.org and I will continue to be injured through deprivation of information to which we are entitled under FECA.

8. My injuries and those of ProtectOurElections.org would be redressed were this Court to declare that the Commission's decision to dismiss our administrative complaint was arbitrary, capricious, an abuse of discretion, based on an impermissible interpretation of FECA, and otherwise contrary to law—and to order the FEC to conform to such declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of July, 2014.



Kevin Zeese
402 E. Lake Avenue
Baltimore, MD 21212