

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 CRAIG HOLMAN IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

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

1. I am one of the signers of the administrative complaint filed with the Federal Election Commission (FEC) against Crossroads GPS that is 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 employed by Plaintiff Public Citizen as its Legislative Representative specializing in campaign finance and government ethics issues. I have a Ph.D. in Political Science from the University of Southern California and I have studied the impact of money on politics for many years, both before and after joining Public Citizen. My duties as an employee of Public Citizen, as well as my independent research interests, involve the study of contributions

to and expenditures by political organizations of various types, including political committees that report contributions and expenditures to the FEC. I rely on disclosure information to advocate for new policies and to evaluate the interests to which lawmakers may be beholden.

4. Based on my work and that of my colleagues, Public Citizen, Inc., has studied and published information about the sources of funds of politically active nonprofit groups, as well as their influence on elections and resulting public policies. Some of that published information can be found on Public Citizen's website at <http://www.citizen.org/Page.aspx?pid=4544> and at <http://www.brightlinesproject.org/>. Public Citizen's ability to study and report on the funding of electioneering activity by nonprofit organizations is impeded by Crossroads GPS's failure to report its donors. That nondisclosure, in turn, is attributable to the FEC's failure to enforce the requirements applicable to political committees against Crossroads GPS. If information about Crossroads GPS's funders were available, Public Citizen would use that information to prepare and publish reports that identified its funders and analyzed the relationship between its political advocacy and the interests of its funders.

5. I am a citizen of the United States and a registered voter in the District of Columbia. 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 Public Citizen 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, Public Citizen and I will continue to be injured by the deprivation of information to which we are entitled under FECA.

8. My injuries and those of Public Citizen 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.



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Craig Holman  
309 Maryland Avenue, NE #3  
Washington, D.C. 20002