

The Hon. Mary M. James

**IN THE CIRCUIT COURT FOR THE STATE OF OREGON
COUNTY OF MARION**

**BRYN HAZELL, FRANCIS NELSON, TOM
CIVILETTI, DAVID DELK, GARY DUELL,
JOAN HORTON, and KEN LEWIS,**

Plaintiffs,

v.

**BILL BRADBURY, Secretary of State of the
State of Oregon,**

and

**HARDY MYERS, Attorney General of the
State of Oregon,**

Defendants.

Case No. 06C-22473

**DECLARATION OF
BRYN HAZELL**

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For Plaintiffs Hazell, Nelson, Civiletti, Delk, and Duell

I, BRYN HAZELL, a plaintiff herein, make the declare under penalty of perjury the following statements based on my own personal knowledge and observation and in support of the Motion for Summary Judgment by Plaintiffs Hazell, Nelson, Civiletti, Delk, and Duell, in the above-captioned court proceeding under ORCP 47.D.

1. I have been an Oregon resident and taxpayer since 1974, with the exception of 2.5 years in Rhode Island during 1989-91.
2. I have been a registered voter in Oregon since 1995, also with the exception of 2.5 years during 1989-91.
3. I have been active in groups interested in campaign finance reform in Oregon for about 8 years. These groups have included Money is Not Democracy (MIND), which has sponsored several initiative petitions for campaign finance reform in Oregon since 1999.
4. I was a Chief Petitioner on Measure 47 of 2006.
5. The participants in these groups, and particularly MIND, have engaged in extensive reading and research into the effect of unlimited campaign contributions and expenditures on Oregon elections and government, including the influence of campaign contributions on the outcomes of elections and on the policies adopted by the winners of elections. This knowledge was used in developing the legislative findings of fact in Section (1) of Measure 47 as we met and discussed the proposed language.
6. To the best of my recollection, among the sources we consulted included:

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Organization	Internet Site
Brennan Center for Justice	www.brennancenter.org
Brookings Institution	www.brook.edu
Center for Responsive Politics	www.opensecrets.org
Common Cause	www.commoncause.org/site/pp.asp?c=dkLNK1MQIwG&b=191979
Federal Election Commission compilations of state laws	www.fec.gov/pubrec/cfl/cfl02/cfl02.shtml
Institute on Money in State Politics	www.followthemoney.org
Money in Politics Action Project	www.oregonfollowthemoney.org
National Conference of State Legislatures	www.ncsl.org/programs/legismgt/about/campfin.htm
National Voting Rights Institute	www.nvri.org
Oregon Center for Public Policy	www.ocpp.org
Public Campaign	www.publiccampaign.org
Public Citizen	www.citizen.org
Reclaim Democracy	www.reclaimdemocracy.org
The Campaign Disclosure Project (Center for Governmental Studies, UCLA Law School)	www.campaigndisclosure.org
U.S. Public Interest Research Group	uspirg.org/money-politics

7. We also conducted extensive and ongoing research in local sources of information, including newspapers and other publications prior to finalizing the language in the text.
8. A participant in many of these discussions was Daniel Meek. He reported to the group (or made available) books and studies, and upon my request has supplied me with a list, which includes:

Birnbaum, Jeffrey H., THE LOBBYISTS (Crown 1992)

Birnbaum, Jeffrey H., THE MONEY MEN – THE REAL STORY OF FUND-RAISING'S INFLUENCE ON POLITICAL POWER IN AMERICA (Crown 2000)

Bretton, Henry L., THE POWER OF MONEY: A POLITICAL-ECONOMIC ANALYSIS WITH SPECIAL EMPHASIS ON THE AMERICAN ECONOMIC SYSTEM (SUNY Press 1980)

Commission of the Association of the Bar of the City of New York, DOLLARS AND DEMOCRACY: A BLUEPRINT FOR CAMPAIGN FINANCE REFORM (Fordham University Press 2000)

Corrado, Anthony, CAMPAIGN FINANCE REFORM: A SOURCEBOOK (Brookings Institution Press 1997)

Green, Mark, SELLING OUT: HOW BIG CORPORATE MONEY BUYS ELECTIONS, RAMS THROUGH LEGISLATION AND BETRAYS OUR DEMOCRACY (ReganBooks 2002)

Jackson, Brooks, HONEST GRAFT– BIG MONEY AND THE AMERICAN POLITICAL PROCESS (Knopf 1988)

Lonsdale, Harry, RUNNING (AuthorHouse 2002)

Palast, Greg, THE BEST DEMOCRACY MONEY CAN BUY (Pluto 2002)

Phillips, Kevin, ARROGANT CAPITAL (Little, Brown 1994)

Stern, Phillip M., THE BEST CONGRESS MONEY CAN BUY (Pantheon Books 1988)

9. We also consulted publications specific to campaign finance reform in Oregon, including:

League of Women Voters of Oregon, CAMPAIGN FINANCE REFORM IN OREGON (2004)

Oregon Secretary of State, THE EFFECT OF 1994 BALLOT MEASURE 9 ON LEGISLATIVE ELECTIONS IN OREGON (1997)

Money in Western Politics Project, CAMPAIGN FINANCE IN OREGON: THE IMPACT OF CAMPAIGN FINANCE REFORM ON THE 1996 OREGON ELECTIONS (1997)

10. We posted on our web site, www.fairelections.net, our findings regarding the influence on money on public officeholders in Oregon, in particular on the home page and at:

www.fairelections.net/cfr-spiel.htm
www.fairelections.net/fe5.htm

Dated: February _____, 2007

Bryn Hazell
City or Town _____
County of Deschutes