

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LAKE TRAVIS CITIZENS COUNCIL,)
)
Plaintiff,)
)
v.)
)
NATALIA ASHLEY, in her official capacity)
as Executive Director of the Texas Ethics)
Commission,)
)
Defendant.)
)

Civil Case No. 1:14-cv-00994- LY

DECLARATION OF AMY CASTO IN SUPPORT OF
PLAINTIFF'S MOTION FOR DECLARATORY JUDGMENT AND PERMANENT AND
PRELIMINARY INJUNCTIONS

I, Amy Casto, declare as follows:

1. I am over the age of 21 and am competent to testify. I have personal knowledge of the facts stated herein and, if called upon, could and would testify competently thereto.
2. I am a Texas resident and a registered voter in Texas.
3. I currently serve as President of Lake Travis Citizens Council.
4. Lake Travis Citizens Council intends to run issue advocacy advertisements to the general public in the Lake Travis, Texas area in 2016 prior to the March 1, 2016, election.
5. Lake Travis Citizens Council wishes to endorse one or more candidates in the race for Texas Senate District 24, a seat that serves Lake Travis-area citizens and that is being vacated by a long-serving incumbent, who will support legislative initiatives and

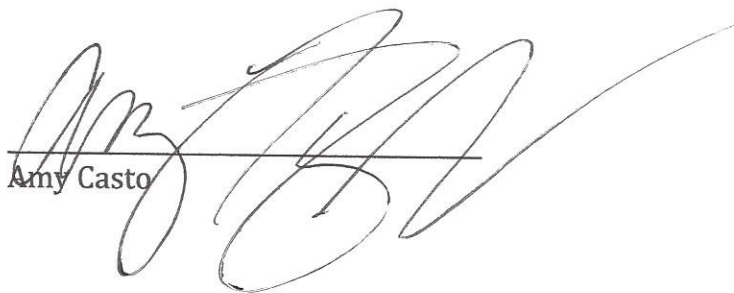
policies that are in the best interest of Lake Travis Citizens Council and the citizens it seeks to advocate on behalf of.

6. Lake Travis Citizens Council intends to run advertisements expressly advocating the election and/or defeat of one or more candidates in the race for Texas Senate District 24.

7. Lake Travis Citizens Council seeks to make the endorsement(s) and conduct such express advocacy communications without triggering "political committee" status in the State of Texas. Therefore, if Lake Travis Citizens Council must limit its expenditures for express advocacy communications to 25% of its expenditures over the entire 2016 calendar year, it is critical for Lake Travis Citizens Council to begin budgeting its annual expenditures (for both its issue advocacy communications and express advocacy communications) prior to the March 1, 2016, election.

8. Lake Travis Citizens Council believes that an overall express advocacy threshold of 25.01% in any given calendar year violates its rights under the First and Fourteenth Amendments to the United States Constitution.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 6th day of November 2015 in Austin, Texas.



Amy Casto