

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

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REPUBLICAN NATIONAL COMMITTEE		)	
310 First Street, SE		)	
Washington, DC 20003		)	
		)	
	Plaintiff,	)	
		)	
v.		)	Civil Case: _____
		)	
INTERNAL REVENUE SERVICE		)	
1111 Constitution Avenue NW		)	
Washington, DC 20224,		)	
		)	
	Defendant.	)	
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**DECLARATION OF KRIS ANDERSON**

Kris Anderson hereby declares and states as follows:

1. I am the Research Director at the Republican National Committee. I worked with Jonathan Waclawski to draft and file the Freedom of Information Act (“FOIA”) request at issue in this lawsuit. I am providing this declaration in support of Plaintiff’s Motion for a Preliminary and Permanent Injunction in this case under FOIA.

2. I have come to learn that the IRS has produced many of the categories of documents that the Republican National Committee requested to other organizations.

3. Both the extended statutory deadline under FOIA, July 23, 2013, and the self-imposed deadline from the IRS, August 23, 2013, have passed. To date the Republican National Committee has received no records and no notice of withheld records in response to my request, and the Republican National Committee still has no firm date by which the IRS will produce any records. The Republican National

Committee merely has a date, April 18, by which the IRS will notify it if it still cannot respond to the request.

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

Executed in Washington, DC, this 15<sup>th</sup> day of April, 2014.

/s/ Kris Anderson  
Kris Anderson