

Good afternoon, I am Josh Gold, political director at New York's Hotel & Motel Trades Council.

I wanted to thank you for this opportunity to testify.

HTC represents approximately 30,000 non-managerial employees working in all hotel departments. More than 300 hotels and other related businesses employ our members and are under contract to our union. This accounts for approximately 75% of the hotel industry within the five boroughs of New York City. While I would like to read a short statement today, I look forward for the opportunity to comment, in full, after the Campaign Finance Board presents draft rules.

There is a compelling public interest to introduce disclosure requirements regarding political speech made to the general public. HTC strongly supports the idea that those who seek to independently influence the general public's voting decisions disclose who they are, their funding and spending.

We do, however, urge the CFB to refrain from attempting to introduce regulations of internal communication within a membership organization. Often, membership organizations from issue-oriented groups and neighborhood associations to labor unions, strive to increase awareness and participation amongst their members through internal communication. We believe that extensive, uninhibited, communication between organizations and their members' helps to increase both knowledge and turnout.

We are concerned that disclosure requirements would do little to "provide critical information and context for members of the public [nor] help them to evaluate advertising messages aimed at influencing their vote"<sup>1</sup>. Requirements, would, however, intimidate internal communication. Any attempt to communicate would create enhanced burdens, limiting the desire to do so and thereby stifling awareness and participation amongst our members, as well as members of organizations Citywide.

As the Charter Revision Commission noted, "the lack of citizen participation in the electoral process seriously weakens our democracy. Even among registered voters, the turnout in elections, especially in New York City, is quite low."<sup>2</sup> The Commission goes on to say that there is little they can do to increase turnout. By requiring membership organizations to disclose internal communications, the CFB may do just the opposite.

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<sup>1</sup> CFB Public Hearing Notice

<sup>2</sup> Final Report of the 2010 New York City Charter Revision Commission