



March 2, 2012

To: New York City Campaign Finance Board

On behalf of Cardinal McCloskey Services, I would like to thank the Campaign Finance Board (CFB) for exempting 501(c)(3) organizations from reporting electioneering communications under the proposed Independent Expenditure Rules. Nonprofits are already limited in campaign activity by their 501(c)(3) status, and requiring them to report electioneering communications, which are allowable under federal guidelines, would place a significant burden on nonprofits, or force them to curtail much needed advocacy efforts.

We greatly appreciate the modification of the proposed rules to exempt 501(c)(3) organizations from disclosure requirements for electioneering communications. In creating this exemption, the CFB recognized that 501(c)(3) organizations are prohibited by the Internal Revenue Code from engaging in partisan political activities to support or oppose candidates for office. We appreciate the CFB hearing our concerns that the definition of electioneering in the original proposed rules would subject 501(c)(3) organizations engaged in issue advocacy to onerous reporting.

Nonprofit organizations have a unique and essential role to play in the policy process. Through our advocacy work, we help ensure the public interest is represented in critical debates that determine public policy and help shape the kind of City we live in. Our advocacy leads to more effective policies enacted to address the underlying causes of societal problems.

Again, we would like to thank the Campaign Finance Board for your important work, and for the modification to the propose rules. Please feel free to contact me at 914-997-8000 x113 if you have any questions.

Sincerely,

Beth Finnerty  
President & CEO