

American Federation of State, County & Municipal Employees, AFL-CIO

125 BARCLAY STREET • NEW YORK, NY 10007-2179

**Political Action &
Legislation Department**

Telephone: 212-815-1550

Fax: 212-815-1553

District Council 37

LILLIAN ROBERTS
Executive Director

EDDIE RODRIGUEZ
President

CLIFFORD KOPPELMAN
Secretary

MAF MISBAH UDDIN
Treasurer

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New York City Campaign Finance Board
40 Rector Street, 7th Floor
New York, NY 10006

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Dear New York City Campaign Finance Board:

The concerns that DC 37 raised at the last public hearing have not been addressed by the revised rules. We believe that CFB has failed to consider the implications and burdens created by these rules, which will require many organizations to hire additional staff people, just to file reports with CFB.

For DC 37, these rules impose a framework that does not reflect how we operate. DC 37 is an amalgam of 55 separate and distinct locals.

Each of these locals has its own constitution, and its own elected executive board.

One of the greatest strengths of DC 37 is that we share resources amongst each other, like supplies, a communications director, and my office, which is political action.

What happens if there are proposed cuts to an agency like ACS? These cuts could conceivably impact over 10 locals. Local 371 represents social service employees. Local 1549 represents the clerical workers. Local 2627 represents the technical support workers. Local 375 represents engineers and city planners. Historically, these locals have taken different political positions, operate independently, and have endorsed different candidates.

Each local may want to do its own mailing to its membership, with a unique message. DC 37 may also do a mailing.

If the printing and mailing is done by a central print shop and mail room within DC 37, who has made the expenditure? What if the copying is done with a photocopier owned by the Local, but the paper is from DC 37? If the DC 37 communications director contacts the press or coordinates a radio show with an elected

official who is running for office, is this a contribution? Who is responsible for filing the disclosure? DC 37 or the Local? Which Local?

Trying to pinpoint who did what and place a dollar amount, or risk \$10,000 fine and years of investigation could tie up union resources in a way that is inimical to the goals of encouraging voter participation. And having to do so within 24 hours of the printing of such materials will require a staff member to spend significant time doing so, instead of educating our membership—which is the mission of DC 37!

While DC 37 supports any effort to level the playing field in electoral politics, the overbreadth of these proposed regulations will lead the Union to have devote significant resources, solely to correspond with CFB. There is nothing secretive about what DC 37 does. We believe the current rules in place meet the objective of letting the public know who supports a candidate, and the type of grassroots and member-to-member lobbying done by labor unions should be exempt from these regulations.

Yours truly,

A handwritten signature in black ink, appearing to read 'Wanda Williams', with a stylized flourish at the end.

Wanda Williams
Director
Political Action and Legislation Department
District Council 37