



To: New York City Campaign Finance Board

On behalf of the Federation of Protestant Welfare Agencies, I would like to express our appreciation to the Campaign Finance Board (CFB) for exempting 501c(3) organizations from reporting electioneering communications under the proposed Independent Expenditure Rules.

Nonprofits are already prohibited by the Internal Revenue Code, i.e. their 501c(3) status, from engaging in partisan political activities to support or oppose candidates for office. 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 appreciate the CFB's recognition of our concerns about the definition of electioneering in the original proposed rules. Nonprofit organizations have a unique and essential role to play in the policy making process. We help to ensure the public interest is represented in critical debates that determine public policy of the city we live in. Through our advocacy, more effective policies were enacted to address the underlying causes of societal problems.

Sincerely,

Fatima Goldman
Executive Director/CEO