



305 7th Avenue 9th Floor New York, NY 10001 212-243-7070 Fax: 212-620-5612 TTY: 800-376-0219
www.goodshepherds.org

March 2, 2012

Dear New York City Campaign Finance Board:

On behalf of Good Shepherd Services (GSS), I would like to give my sincere thanks to the Campaign Finance Board (CFB) for exempting 501(c)(3) organizations from reporting electioneering communications under the proposed Independent Expenditure Rules. The 501(c)(3) status already places limits on nonprofits' campaign activity. Introducing additional limitations on nonprofits' electioneering communications, would force these organizations to struggle with an added burden or curtail much needed advocacy efforts.

We very much appreciate the modification of the proposed rules so that they will not require 501(c)(3) organizations to disclose electioneering communications. In creating this exemption, the CFB recognized the fact that 501(c)(3) organizations are prohibited by the Internal Revenue Code from engaging in partisan political activities that support or oppose candidates for office. We appreciate that the CFB listened to our concerns that the definition of electioneering in the original proposed rules would require arduous reporting from 501(c)(3) organizations engaged in issue advocacy.

Nonprofit organizations have an important role to play in the policy process. Through our advocacy work, we help to represent the public interest in crucial debates that determine public policy and shape the kind of city we live in. Our advocacy leads to the creation of more efficient policies that address the underlying causes of societal problems.

GSS is a leading youth development, education, and family service agency that serves over 23,000 program participants a year. Focusing on high-need communities in Brooklyn and the Bronx, we provide a broad array of individual, family, and school-based services to prevent youth from becoming disconnected from family, school, and society.

I thank you, again, for your vital work and for the modification to the proposed rules. Please feel free to contact Michelle Yanche, Director of Public Policy, at michelle_yanche@goodshepherds.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Paulette Lo Monaco".

Sr. Paulette LoMonaco
Executive Director