



Testimony for Freelancers Union

Thank you for the opportunity to offer comments about proposed independent expenditure regulations.

My name is Althea Erickson, and I am the Director of Advocacy and Policy at Freelancers Union, a national nonprofit membership organization that promotes the interests of independent workers—the self-employed, independent contractors, temporary and part-time workers—through advocacy, education, and services. We have over 90,000 members in New York City, and regularly communicate with our members about upcoming elections, the candidates running in their districts, and their stances on freelancer issues. Due to the nature of independent work, many of our members do not have strong ties to traditional institutions and rely on Freelancers Union to let them know about opportunities to engage in the democratic process. In a world where very few people can name their Congressional representative, we give our members a reason to care about who their City Council member is and how local elections relate to their daily lives. There is no doubt that our communications with our members have increased their participation in the electoral process—a goal we all share of getting more people to exercise their democratic rights.

While we support the intent of the amendment to the City Charter—requiring greater disclosure and transparency of independent expenditures—this should not be done at the expense of membership organizations' ability to educate their members about upcoming elections. Unfortunately, the administrative burdens proposed under independent expenditure rules for New York City elections would hamper our ability to communicate with our members, likely reducing their participation in the democratic process.

If we spend as little as \$1,000 communicating with our members about a candidate's stand on legislative issues, we would have to file extensive financial reports for the first time. Reporting is not a simple process that our staff can easily add to their current responsibilities, and we may have to incur new accounting and legal costs to comply. There would be as many as 12 scheduled reports, plus up to 14 more just before the primary or general election. Each report would require a great deal of information and documentation. For instance, we would have to keep track of staff's time dedicated to designing and disseminating a leaflet to vote for a particular candidate. Failure to report, or reporting incorrectly, could lead to lengthy investigations, \$10,000 fines, and even criminal prosecution—a risk we are all reluctant to take. Overall, such proposed rules make it onerous for us to encourage our members to engage in the democratic process.

By excluding communications that are only directed to an organization's membership from the proposed rule, the Campaign Finance Board can fulfill the City Charter amendment's goal of bringing transparency and accountability to independent political expenditures without stifling speech that is critical to our democracy.

Thank you again for the opportunity to speak today.