



moving victims of violence from crisis to confidence

November 2, 2011

Joseph P. Parkes, S.J., Chairman
New York City Campaign Finance Board
40 Rector Street, 7th Floor
New York, NY 10006

Dear Chairman Parkes:

On behalf of the Board and staff of Safe Horizon, I urge the Board to withdraw the proposal to force non-profit organizations which engage in advocacy with elected officials within three months of an election to register with the Campaign Finance Board (CFB). I believe this proposal goes well beyond the mandate and intent of the 2010 Charter amendment requiring the disclosure of independent expenditures by individuals and groups, and runs counter to the Board's mission of increasing citizen participation in the political process.

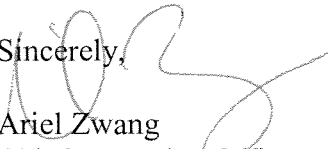
Specifically, the proposal would require us to register with the CFB if we spend at least \$1,000 asking our supporters to contact elected officials in support of critical legislation or desperately-needed budget allocations. We would be asked to state whether we "support" or "oppose" that elected official for re-election, even though as a 501(c)(3) non-profit entity we are strictly prohibited from engaging in this activity. We would be required to submit numerous reports to the CFB throughout the course of the election year, a task that would take us away from the mission of serving victims of crime and their families.

In short, this rule mistakenly treats non-profit organizations as if we were political candidates, political action committees, or other entities that engage in campaign activities.

The CFB can fulfill the City Charter amendment's goal of bringing transparency and accountability to independent political expenditures without stifling speech by limiting its proposal to "express advocacy", the spending that clearly supports or opposes candidates in elections. We respectfully ask that the CFB withdraw this proposal so that organizations like Safe Horizon can continue to engage elected officials in substantive advocacy.

Safe Horizon is the nation's leading victim assistance organization, helping 250,000 New Yorkers each year whose lives have been touched by violence. Our mission is to provide support, prevent violence, and promote justice for victims of crime and abuse, their families and communities.

Sincerely,


Ariel Zwang
Chief Executive Officer