



NEW YORK CITY CAMPAIGN FINANCE BOARD

PUBLIC HEARING ON THE DISCLOSURE OF
INDEPENDENT EXPENDITURES

October 27, 2011

TESTIMONY OF WOMEN'S CITY CLUB OF NEW YORK

The very non-partisan organizations that have advocated on behalf of campaign finance reform, urged increases in matching fund ratios, and demanded transparency for contributions to political campaigns, may now find themselves coming within the regulatory scope of the New York City Campaign Finance Law. The Women's City Club of New York is one of these groups. WCC is a nonprofit, nonpartisan, multi-issue activist organization founded in 1915. Our mission is to improve the lives of New Yorkers by helping to shape public policy and promoting responsible government. We do not support or oppose candidates for election, but we take positions on Mayoral budgets, on policies and actions by Mayoral agencies, on City Council bills, and on New York City ballot propositions.

The definition of express advocacy communications, §13-01(g) of the Proposed Independent Expenditure Rules, raises questions about how advocacy organizations can continue their historic role in New York City without having to file the burdensome reports previously required only of political campaigns and candidates.

WCC advocates for or against ballot proposals and our communications may praise or criticize the policies of office holders or candidates for office. Because we are an organization with a small staff, some interns, and a large number of volunteers doing policy and administrative work, it is possible that we would not reach the \$1,000 threshold. We are a multi-issue organization, and allocating expenses to one particular issue or comments on a particular candidate's policies, would be highly difficult. If we come close to the threshold, caution would dictate that we file.

In our past testimony WCC supported the exemption of routine newsletters or communications directed to one's own members as set forth in §13-02(c). We have traditionally used our member newsletters to inform our members of our policy positions. We now post our member newsletters on the WCC website and the contents are readily available to non-members. The express advocacy communications therein would apparently fall under the scope of §13-02(g). None of these items is specifically intended to help particular candidates in particular campaigns.

The proposed rules would create a heavy burden on small organizations such as ours. Can there not be a one-time form for such organizations, setting forth total expenditures during an election cycle if they spend more than \$1,000 but less than \$5,000? The public would still be adequately informed, and the requirement of the New York City Charter, Section 1052(a) (15) (b) that such expenditure, "...shall be required to be disclosed to the board" would be met.

The difficulties that will be faced by New York City's civic organizations in making sure they meet the CFB reporting requirements should not end up turning 'good government' groups into delinquents.

Respectfully submitted,

Barbara T. Rochman
Women's City Club of New York
307 Seventh Avenue, Suite 1403
New York, NY 10001
(212) 353-8070