



**Carly Marie Knudson, Executive Director
New Yorkers for Clean, Livable and Safe Streets**

Testimony before the New York City Campaign Finance Board



I am Carly Knudson, Executive Director of New Yorkers for Clean, Livable and Safe Streets (NYCLASS). We are a non-profit animal advocacy organization committed to bettering the lives of New York City's animals. I would like to thank you for this opportunity to testify to offer comments about proposed independent expenditure regulations.

Advocacy allows us to serve this city and promote new causes through educating the public and policymakers, conducting research, litigating, organizing, lobbying, and keeping an open dialogue. City Council members depend on nonprofits to surface the impacts of proposed legislation, policies and budgeting on New York City communities.

It's critical for nonprofits like NYCLASS to take part in the democratic process, and advocacy is one of our most effective tools to achieve our goals. This is not only our First Amendment right - it is our responsibility to the individuals and communities we serve and represent.

We strongly believe these new rules will destroy non-profit, grassroots and member-to-member legislative advocacy programs.

The proposed regulations would make it extremely difficult for non-profit membership organizations to communicate with the public about political issues. When our supporters communicate with each other about current affairs, it increases participation in the political process. History demonstrates that when organizations communicate with their members about politics — those members are more likely to participate in the electoral process.

However, instead of purely regulating speech intended to help influence the public and directly affect an election, the proposed regulations would dictate speech which is supposed to educate the public on the decisions and policies of elected officials as well as communication by organizations with their own members.

It would also limit or prohibit much of our membership and public advocacy, and our everyday engagement with public officials, by treating it as a so-called "in-kind contribution" to a "candidate."



New Yorkers for Clean, Livable & Safe Streets

Moving forward with these regulations threatens our ability to communicate with the public about legislative issues and participating effectively in policy debates.

As many of you already know, a horse collapsed and died in Midtown last weekend. In notifying our supporters of this horrific incident, we asked that they call their Councilmembers to voice the need to pass Intro 86A to remove horses from hectic city streets. Had this been an election year, this simple act of communicating information would have to be considered an independent expenditure.

We are not political campaigns and shouldn't be required to file campaign disclosures.

As you can see, many, including NYCLASS fear the response to the CFB's proposed rules will result in limiting their own speech – an outcome at odds with the CFB's broad goal of increasing participation in the democratic process.

While we support the Charter amendment requiring disclosures for election related independent expenditures, as drafted, the regulations threaten the ability of organizations such as NYCLASS to participate effectively in policy debates and communicate with the public about legislative issues. The Board should focus on what the Charter amendment was designed to do: ensure that when wealthy people spend money communicating directly with the general public they have to disclose it.

In summary, nonprofit organizations have a unique and essential role to play in the policy process. The CFB should not interfere with our right to participate in legislative and issue advocacy. The consequences of these actions run counter to the CFB's broad goal of increasing participation in the democratic process.

Thank you again for the opportunity to offer testimony.