



NYC CFB RECEIVED
2011 OCT 27 P 12:40

Harry M. Kresky, Esq.
Chair
Election Law Committee
505 West 54th St., #419
New York, NY 10019
Phone: (212) 581-1516
Email: hkresky@harrykresky.com

President
Stewart D. Aaron

President-Elect
Barbara Moses

Vice President
Lewis F. Tesser

Secretary
Susan J. Walsh

Treasurer
Gail Donoghue

Immediate
Past President
James B. Kobak, Jr.

October 27, 2011

BY FAX AND MAIL

Hon. Amy M. Loprest
Executive Director
New York City Campaign Finance Board
40 Rector Street (7th fl)
New York, NY 10006

Re: Proposed Independent Expenditure Rules

Dear Ms. Loprest:

At its regular meeting yesterday evening the Election Law Committee voted to send this letter to you regarding the "Proposed Independent Expenditure Rules for New York City Elections."

The proposed rules raise significant concerns under the freedom of speech guarantees of the United States and New York State Constitutions for those engaging in independent political activity. The Committee urges that the Campaign Finance Board not adopt the proposed rules until there has been further discussion of these concerns.

The views expressed in this letter are those of the Election Law Committee and do not necessarily reflect those of the New York County Lawyers' Association.

Sincerely yours.



Harry Kresky