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2011 NOV 9 P 12: 24
NOT RECEIVED

November 2, 2011

New York City Campaign Finance Board
40 Rector Street, 7th Floor
New York, NY 10006

Dear New York City Campaign Finance Board:

We would like to commend the Campaign Finance Board for their engagement with the public while creating proposed rules pursuant to the Charter amendment mandate. UJA-Federation of New York is a strong supporter of campaign finance rules and appreciates the ongoing dialogue on this important topic. Based upon our understanding of the proposed requirements, we respectfully suggest one clarification to the proposed rules.

We believe that creating a clearer distinction between issue advocacy and electioneering will help to preserve and promote transparency while allowing UJA-Federation of New York and other social service groups to continue our mission to serve the poor and vulnerable. Particularly during the last few months of the city fiscal year, UJA-Federation of New York frequently communicates with the over 100 agencies in our network to encourage outreach to elected officials with messaging at times similar to your electioneering example of "Tell Candidate X that her position on budget cuts is wrong."

UJA-Federation of New York does not refer to elected officials as candidates, nor do we engage in any election-related outreach as outlined under 501(c)3 regulations. However, we do consider budget and legislative advocacy to be an important part of our work and one that does not intrude into the realm of election campaigns.

We strongly urge a clear distinction between electioneering and advocacy that will allow UJA-Federation to continue with our advocacy efforts while continuing to comply with city lobbying and federal tax exemption laws. Civic participation is an important part of the democratic process and we look forward to a partnership with the Campaign Finance Board.

Thank you for your time and please do not hesitate to contact me for further feedback.

Sincerely,

Ronald Soloway
Managing Director, Government and External Relations

Cara Berkowitz
Director of City and Public Affairs