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*District Council*

**37**

**Wanda Williams' Testimony  
before the Campaign Finance Board  
October 27, 2011**

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Good afternoon. My name is Wanda Williams and I am the Director of the Political Action Department of District Council 37. DC 37 is the City's largest municipal labor union. We represent close to 120,000 members, the people who make every city agency in New York City run. When elected officials make decisions about the City's budget or how a City agency will operate, it directly impacts our members, not only as residents and taxpayers, but precisely because these decisions directly impact their jobs.

DC 37 has always prioritized and made political education and activity an integral part of its mission. And we have always done so in a public way. Indeed, educating and promoting political activity is central to what we do and who we are. When DC 37 endorses a candidate, we do so publicly. The folks you see on street corners on election day from DC 37 are undeniably from DC 37. How do you know? Because we make sure that DC 37 members wear their green t-shirts. When DC 37 or another local contributes to a campaign, that information is, as it should be, disclosed to the CFB. We support the goals of making the financing of campaigns transparent to the public.

But the ambiguity and overreach of these proposed rules creates more questions than answers, and will impact DC 37 in a way that most memberships will not have to face. The result may be during the election cycle, every single communication or action DC 37 or one of our affiliated locals takes will require approval from a lawyer, and disclosure to the CFB. The proposed rules require disclosure within 24 hours in some cases.

I thank you for allowing me to explain how this will impact DC 37.

DC 37 is an amalgam of 55 separate and distinct locals. Each of these locals has its own constitution, and its own elected executive board. One of the greatest strengths of DC 37 is that we share resources amongst each other, like supplies, a communications director, and my office, which is political action.

As you know, DC 37 has a PAC. But 8 other locals have their own PACs. The individual locals and DC 37 do not always endorse the same candidate or have the same political views. So while there are lawyers who work for DC 37, not every local, particularly smaller locals, have access to people who can tell them whether or not a particular flier or mailing falls within the new disclosure rules of CFB. We recognize that the goal of the CFB is not to stifle political speech and discussion, but if these new rules are promulgated this is exactly what will occur. If, for example, one of our smaller locals wants to mail out a flier denouncing a particular candidate's position on an issue that directly impacts its members, these rules could very well make them think twice about doing so. Why? Because now this local would have to potentially hire a lawyer or other individual review the mailing and if appropriate prepare the disclosure paperwork. This small local may very well simply say – it isn't worth it. The end result is a stakeholder would be barred from expressing its views about important issues that impact its membership.

Let me give you a real life example of how confusing this will be for DC 37. What happens if there are proposed cuts to an agency like ACS? These cuts could conceivably impact over 10 locals. Local 371 represents social service employees. Local 1549 represents the clerical workers. Local 2627 represents the technical support workers. Local 375 represents engineers and city planners. Historically, these locals have taken different political positions, operate independently, and have endorsed different candidates.

Each local may want to do its own mailing to its membership, with a unique message. DC 37 may also do a mailing. If the printing and mailing is done by a central print shop and mail room within DC 37, who has made the expenditure? What if the copying is done with a photocopier owned by the Local, but the paper is from DC 37? If the DC 37 communications director contacts the press or coordinates a radio show with an elected official who is running for office, is this a contribution? Who is responsible for filing the disclosure? DC 37 or the Local? Which local?

What happens at a rally, where 5 candidates appear to speak about the importance of providing service to needy children? And 15 different DC 37 local presidents speak at the rally? The costs of

the literature and sound truck and logistics would have to be disclosed, according to these proposed rules. Which local made the expenditure? If it is considered coordinated activity because someone from DC 37 invited the candidates to speak about a matter of public importance, which candidate is the perceived beneficiary of the activity? What happens at joint Municipal Labor Coalition rallies? Unions exist to help working people have their voices heard, through the power of collective organizing. Trying to pinpoint who did what and place a dollar amount, or risk \$10,000 fine and years of investigation could tie up union resources in a way that is inimical to the goals of encouraging voter participation.

While DC 37 supports any effort to level the playing field in electoral politics, the overbreadth of these proposed regulations will lead the Union to have to devote significant resources, solely to correspond with CFB. There is nothing secretive about what DC 37 does. We believe the current rules in place meet the objective of letting the public know who supports a candidate, and the type of grassroots and member-to-member lobbying done by labor unions should be exempt from these regulations.

Thank you for allowing me the opportunity to testify before you today. I will be happy to answer any questions that you may have.