



Rico Mastrodonato <rmastrodonato@ecovote.org> on 04/07/2004 02:31:30 PM

To: politicalcommitteestatus@fec.gov
cc:
Subject: Comments on Proposed Rule Changes

Please accept attached letter as formal comment on proposed rule changes.

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. FEC rule change Final.doc

Dear Ms. Mai T. Dinh,

I am writing to you regarding proposed rule changes from the Federal Election Commission (FEC) and am submitting this letter as formal comment.

Under the proposed rules, nonprofit organizations that advocate for cancer research, gun and abortion restrictions or rights, fiscal discipline, tax reform, poverty issues, immigration reform, the environment, or civil rights or liberties - all these organizations could be transformed into political committees if they criticize or commend members of Congress or the President based on their official actions or policy positions.

The chilling effect of the proposed rules on free speech cannot be overstated. Merely expressing an opinion about an officeholder's policies could turn a nonprofit group OVERNIGHT into a federally regulated political committee with debilitating fund-raising restrictions.

Such changes would cripple the ability of groups to raise and spend funds in pursuit of their mission and could be so ruinous that organizations would be forced to back away from meaningful conversations about public policies that affect millions of Americans.

The FEC should not, in a few weeks, tear up the fabric of tax-exempt law that has existed for decades and under which thousands of nonprofit groups have structured their activities and their governance. The Internal Revenue Code already prohibits 501(c)(3) charities from intervening in political candidate campaigns, and IRS rules for other 501(c) groups prohibit them from ever having a primary purpose to influence any candidate elections -- federal, state, or local.

Please consider our vigorous opposition to the proposed rule changes by the FEC. It is our sincere opinion that the FEC's proposed rule changes would dramatically impair vital and robust debate about important national issues. It would hurt nonprofit groups across the political spectrum and restrict First Amendment freedoms in ways that are unhealthy for our democracy.

Sincerely,

Susan Smartt

Executive Director