



Cassandra Garrison <cgarrison@oregonfoodbank.org> on 02/04/2004

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To: mdove@fec.gov

cc:

Subject: Oregon Food Bank

Oregon Food Bank agrees with the comments submitted today by 324 organizations. I am writing regarding the pending action by the Federal Election Commission that could severely restrict the ability of 501(c)(3) and 501(c)(4) organizations to engage in federal policy advocacy that could be considered to "promote, support, attack, or oppose" any candidate for federal office, including people currently in office.

This action would mean that our 501(c)(3) and 501(c)(4) organization could not issue a press release, a report, a fundraising letter, post something on a website, or engage in any other form of public communication that was critical or supportive of the policy positions of President Bush, any other candidate for President, or anyone running for Congress or the Senate unless it was using funds specifically raised from individuals who would be limited to contributions of \$5,000 or less.

Because our mission is to address the root causes of hunger, we educate our stakeholders and the public on important public policy issues. Sometimes, these issues are also taken by candidates for public office. As a 501(c)(3), we do not endorse or even comment on candidates for election. We focus solely on public policies issues. If the draft opinion is adopted as proposed by the General Counsel, the result may be that we could no longer conduct unless we raise and spend funds in accordance with the source and contribution limitations of the FECA.

For most of our regional food bank organizations, raising funds under these restrictions would be impossible. For most of these organizations represented by the Oregon Food Bank, we are not permitted under federal tax law to establish or maintain a separate segregated fund to engage in political activity. Therefore, this opinion would entirely shut down many of the advocacy activities of our organization.

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"...because no one should be hungry."