To: politicalcommitteestatus@fec.gov
cc: FECcomment@moveon.org

Subject: Public comment on political commitees

Please see the attached document.
 Thanks
Deni Taveras

 . FEC.doc

March 31, 2004

1612 Webster St., NW
Washington, DC 20011

Ms. Mai T. Dinh
Acting Assistant General Counsel
Federal Elections Commission
999 E. St., NW
Washington, DC 20463

Dear Ms. Dinh:

I am writing to you as a board and general member of several not-for-profit organizations involved in increasing civic participation within low-income neighborhoods and communities of color that will be highly and negatively affected by the 11 CFR Parts 100, 102, 104, 106 and 114 proposed rule on political committee status and expenditures. I find the current proposal, open for public comment to the Federal Elections Commission ("FEC"), a serious and direct threat to the fundamental checks and balances of our political system, and to the values on which this country is based on--freedom of speech and democracy.

There are several reasons why I vehemently am against this rule. The Federal Elections Commission has no authority to regulate legitimate activities of nonprofit organizations in the future nor retroactively as delineated in the rule. Congress has considered and rejected to redefine nonprofits as political committees when they are engaged in legitimate nonpartisan activities that fall within their mission statements. Furthermore, the Supreme Court has upheld the decision to not treat non-profit interest groups as political committees. The McCain-Feingold campaign reform law is being misused to gag and change what independent nonprofit interest groups can do, including political organization (§527) never before subjected to FEC regulation. The fact is current disclosure laws are sufficient in providing the necessary transparency needed to inform the public of the activities of these types of nonpartisan organizations. In turn, the passing of such rule would cripple the necessary open and vigorous debate, and stonewall the necessary steps that are often needed surrounding important national issues.

If these changes are approved it will allow for the continued disenfranchisement of poor neighborhoods and communities of color that already bear an unprecedented socio-economic pressure due to high political apathy evident in low voter turnout rates, among other social ills. Moreover, Latinos are a growing ethnic population, as such, mechanisms--that are not stigmatized by sordid partisan politics--must be in place to allow for the social and civic integration of these very communities we are attempting to assimilate into the American political process. These organizations will be treated as federal political committees and therefore could not receive grants from any corporation, even an incorporated nonprofit foundation, from any union, or from any individual in

excess of $5,000 per year. Any 501 (c) (3) organization that spends $50,000 to increase "good government" behavior, or provide, encourage, and motivate voter mobilization, will be stigmatized for attempting to ensure that the political activities of our representatives are in the best interest of ALL their constituents. As such, these rules will destroy already poor and struggling not-for-profit, non-partisan organizations from raising and spending funds in pursuit of their mission. These organization often exists in communities of color and low-income communities, affecting nearly 100 million Americans.

Not-for-profit organizations, such as the ones I represent and am involved in, engaged in increasing political and legislative awareness, voter registration, voter identification, and get-out-the-vote campaigns, while decreasing continued voter disenfranchisement, are being unjustly charged with having a hidden partisan agenda. This is not only misleading, it is just plain wrong.

Cordially,

Deni L. Taveras, MS, MPA-URP
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Advisory Board Member, Empowerment and Justice Alliance
Member, Dominican-American National Roundtable