

To whom it concerns:

United Way of King County has significant concerns that the PDC's proposed grassroots lobbying rules will create significant administrative burdens on non-profit organizations like ourselves and the community-based organizations we fund.

A very small portion of our investments in King County communities are focused on building advocacy capacity in BIPOC nonprofits so that historically under-resourced community of color-led organizations can speak in their own voices on their communities' behalfs. These rules run counter to our efforts to remediate historical injustices by building advocacy capacity in small, BIPOC nonprofits. Creating new administrative burdens on speaking out against systemic racism is, in fact, a way that systemic racism shows up and is perpetuated. It would be a grave injustice for the PDC to create a barrier for organizations that lack administrative capacity to lift up the voices of historically marginalized communities so they can engage in our democracy.

This can be remedied by ensuring the thresholds are reasonably high. True grassroots campaigns should not meet the threshold for disclosure, because by their nature they are made up of community members coming together to begin organizing and engaging. A \$500 threshold is too low and will capture the efforts of tiny organizations as well as organizations that mostly do philanthropy but do a small amount of advocacy. A more reasonable threshold would be \$2,500 or more. It seems the PDC is unaware of the de minimus impact of a \$500 investment in grassroots advocacy

In terms of larger organizations' advocacy, you should know that, due to IRS restrictions on 501 (c) 3 lobbying and the cautious nature of nonprofit boards, even large nonprofits and community foundations have very limited advocacy budgets and staffing. Regardless of our overall budget, even an organization our size (over \$50M/year budget) will experience significant burdens and will find our ability to engage community members in our advocacy diminished as a result of the PDC's proposed rules. . As both a funder and manager of a small team that occasionally send out action alerts, I dread untangling the snarl the PDC is proposing to create. We will spend far more in complying with these proposed rules than we would in the grassroots advocacy itself.

Finally, because funding for advocacy is limited, most of United Way's advocacy work is funded by unrestricted donations, so there is no direct link between specific donors' gifts and staff advocacy activities like sending action alerts. The PDC's approach is far too broad for the nature of the grassroots advocacy that nonprofits engage in and the regulations are disproportionate to the level of activity. The PDC is casting too wide a net on this issue, which is naturally capped by IRS limits and is by definition one of nascent organizing and thus limited capacity to report.

The PDC should not be in the business of putting nonprofit funding and staffing for truly grassroots advocacy out of business, furthering harm to historically under-resourced communities, and keeping community voices out of Washington politics.

Thank you for your attention to our concerns.

Sincerely,

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