



November 18, 2016

Martin Levine
Director of Lobbying and FDS Compliance
Joint Commission on Public Ethics
540 Broadway
Albany, NY 12207
Via email: martin.levine@jcope.ny.gov

Re: Comments on staff draft Lobbying Act regulations

Dear Mr. Levine,

The Nonprofit Coordinating Committee of New York (NPCC) writes to express our strong and unqualified support for the Lawyers Alliance for New York's positions regarding the draft Lobbying Act regulations, as expressed in its November 11, 2016 letter to the Joint Commission on Public Ethics (JCOPE).

NPCC is a membership organization with more than 1,450 nonprofit members throughout New York City, Westchester and Long Island. Founded in 1984 to contest a government proposal to remove the charitable property tax exemption from many of New York City's nonprofit cultural institutions, NPCC has since evolved into the area's "go-to" capacity building and information resource for local nonprofits. NPCC strengthens the nonprofit sector through a number of programs that convene, resource, and advocate for nonprofits throughout New York City and New York State. With programs designed to provide valuable benefits and guidance for 501(c)(3) organizations, NPCC's mission is to serve as the voice and information source for the New York City area nonprofit community, creating a sector that is better informed, managed, transparent, and represented at all levels of government.

NPCC is concerned with the draft Lobbying Act regulations because they will affect most, if not all, of our nonprofit members. We agree without reservation with the Lawyer's Alliance for New York that, while the proposed regulations will streamline and improve compliance in important ways, JCOPE lacks authority to regulate people and entities that have neither engaged a lobbyist nor accepted money to lobby on behalf of another person or entity or to regulate the personal social media accounts of members and employees. We further agree with the additional issues raised by the Lawyers Alliance for New York.

NPCC urges JCOPE to revise its draft regulations as outlined by the Lawyers Alliance for New York in its November 11th letter. Thank you for your attention to this matter. I can be reached at sstapel@npccny.org with any questions you might have.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sharon Stapel".

Sharon Stapel
President

cc: Laura Abel, Lawyers Alliance for New York, by email: label@lawyersalliance.org