

To the New York City Campaign Finance Board

Thank you for the timely release of draft guidelines in response to extension of term limits.

There is a situation not explicitly covered in the guidelines – unlikely, perhaps, but possible. This deals with a previously term-limited candidate who anticipated running for higher city office but chose, instead, to run for re-election and “froze” the old campaign committee until 2013 (Group 1, Option A in the guidelines).

Such a candidate might later decide not to run at all or might decide to run for a state office. We wondered what would happen with those “frozen” funds. Are there rules already in place that apply if a candidate decides not to run after establishing a campaign committee or switches to run for a non-city position?

We appreciate the work you have done to respond quickly to the new City Council legislation. Except for the issue stated above, we have no further comment on your draft.

The Women’s City Club of New York, founded in 1915, advocates for policies and programs to improve the lives of all New Yorkers.

Sincerely,

Barbara Zucker  
Vice President for Public Policy