

To: NYC Campaign Finance Board

As a candidate for the City Council in the 2009 election your proposed draft guidelines in case the Mayors term limits proposal is enacted appears to give an enormous advantage to incumbents. The ability for them to transfer funds from their frozen accounts means that they will have raised the maximum amount for a council run in one fell swoop. This enormous monetary advantage clearly distorts the playing field and no longer makes it a level one.

I believe you must re-think this proposal and absolutely not allow any transfer of funds from a frozen account to a new account. This draft proposal which I call "The Incumbents Protection Plan" will be embraced by incumbents. The cost of the transfer of funds from "frozen" accounts to their new council campaign accounts would be the 6-to-1 match. This is a small cost for a campaign to absorb especially when most of these candidates have raised hundreds of thousands if not millions in their frozen accounts. Since they were mostly running for higher office and are incumbents they have raised enormous sums as opposed to the new crop of council candidates that have only begun to put together their grass roots campaign.

This plan does everything to tilt the Level Playing Field. You really need to do better. I am disappointed.

Thank you.

-Bob Friedrich-
NYC Council Candidate 23rd CD