

END CITIZENS UNITED — ACTION FUND —

November 4, 2019

CC:PA:LPD:PR
(REG-102508-16)
Room 5203, Internal Revenue Service
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

We've seen an explosion of dark money political spending--spending by groups that don't have to disclose their donors--since the Supreme Court's disastrous *Citizens United v. FEC* decision nearly a decade ago. In fact, roughly \$965 million of dark money has been spent in the elections since the 2010 decision, a seven-fold increase in such spending from the eight years before the decision. As we learned from the 2016 election, some of that spending was paid for by foreign agents trying to sow discord, turn Americans against each other, and depress voter turnout.

This proposed rule would make that situation worse.

Transparency is critical to a democracy that's open and accountable to the people. No longer requiring politically-active nonprofit organizations to disclose their major donors to the IRS will undermine this core tenet of our political system and make it easier for unscrupulous organizations to accept and spend dark money and illegal foreign contributions on our elections without oversight or consequence.

On behalf of End Citizens United Action Fund and our more than four million members, we vigorously oppose this proposed rule and strongly urge the IRS to focus on proposals that will make government more responsive to the needs of Americans, not less.

Sincerely,

A handwritten signature in black ink, appearing to read "Tiffany Muller". The signature is fluid and cursive, with the first name being more prominent.

Tiffany Muller
President