ALL SAINTS CHURCH

POLICY PROHIBITING POLITICAL CAMPAIGN ACTIVITY

In order to maintain its exemption from federal income tax under section 501(c)(3) of the Code, All Saints Church (the "Church") has a long-established policy that prohibits the use of Church resources to support partisan political activity or to intervene in an election or political campaign on the side of any candidate or party. Thus, while we encourage all members of the Church community to share and advance their diverse opinions regarding the important social and political issues of the day and to embody the social justice vision of the Bible, we must all avoid statements or activities that could be considered endorsements by the Church of particular candidates or political parties. This rule has no exceptions and prohibits all electioneering activity, even if it is *de minimis* or inadvertent.

The following guidelines support this policy:

- 1) The ban on electioneering on behalf of candidates or parties, covers state and local elections, not just federal. Primaries are treated the same as the general election.
- 2) An individual is a "candidate for public office" from the moment he or she holds himself or herself out (or is held out by others) to the public as a candidate. Hence, providing any kind of support to someone who is seeking public office will violate the prohibition even if the election is still months away.
- 3) The electioneering ban encompasses any activity that benefits (or opposes) a particular candidate or slate of candidates. Hence, activities that fall well short of an explicit endorsement or campaign contribution can violate the prohibition.
- 4) No Church resources may be used for any partisan political purpose. For this purpose, "resources" are defined broadly to include its facilities, personnel, equipment, intellectual property, information, or contacts gained while working for the organization.
- 5) The ban on electioneering does not extend to ballot initiatives and propositions. Thus, the Church is free to use its resources to oppose or support particular issues that are encompassed within a ballot initiative or proposition so long as lobbying activities, including these efforts, do not constitute a substantial part of the Church's activities.

Of course, Church employees, volunteers and members are free to get involved in campaigns during their free time as private citizens. However, in no case may Church

resources be used. For example, the following hypothetical scenarios would constitute prohibited activities:

- A church member gains access to the Church's membership mailing list while assisting with Katrina disaster relief efforts and later uses the mailing list to recruit volunteers for a political campaign;
- A Church leader provides non-public information about the Church to a candidate's campaign or political party;
- Members of one of the Church Ministries use their Ministry's budget or other Church resources (such as telephones, copiers, computers, or email) to endorse or oppose a candidate or political party;
- A group of Church employees or volunteers uses a conference room or other Church facility to work for a political campaign during hours when they are compensated by the Church or during which they are purportedly volunteering for the Church;
- A Church leader uses the Church's logo, trademarks/intellectual property, or letterhead when communicating with a candidate or with the public about a candidate.
- A Church ministry makes available to Church members on the property of the Church copies of literature supporting or opposing a particular candidate or party.

The prohibition on use of Church resources in a candidate's campaign goes to the heart of our tax-exempt status. Any Church representative who gets involved in a candidate's campaign must convey to all interested parties that he or she cannot and does not represent the views of the Church. In some instances, this may require the individual to provide a disclaimer, clearly stating (in advance of any work performed) that actions taken or the statements made are those of the individual and not of the Church.

Finally, any Church representative who speaks, writes or otherwise participates in a forum sponsored by the Church will be asked to refrain from expressing views that endorse any specific candidate or political party.

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We appreciate your cooperation and trust that you will follow these Guidelines to help ensure that Church preserves its tax exempt status, thereby enabling us to continue our important work in the community. If you have any questions, please do not hesitate to contact the Rector, the Parish Administrator or any member of the Vestry.