

THE ROOSEVELT INSTITUTION

Phone: (202) 483-2515 • Fax: (202) 483-2657 • 1527 New Hampshire Avenue, NW, 4th floor, DC

Memo: Chapter Legal Guidelines

Date: 8/5/07

Subject: Guidelines for chapters on the legal status of RI

Introduction

The Roosevelt Institution is now widely known for its success as a network of student-run think tanks, with chapters forming on over one hundred college campuses across the United States. What many do not know is that the Roosevelt Institution is also a nonprofit corporation registered in the State of New York as a subsidiary of the Franklin and Eleanor Roosevelt Institute. By existing as a separate legal entity from any of the universities and colleges of which we are a part, we are able to pursue many long-term goals that could not otherwise be accomplished.

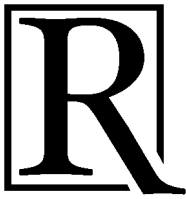
Besides the benefits of having a separate support structure that can both serve and organize the needs of the Roosevelt Institution's chapters, this corporation allows us to pursue tax-exempt status with the Internal Revenue Service and the State of New York.

Our charter is to get student ideas into the public discourse and to train young people in leadership and public policy, and so we can register as a 501(c)(3) educational institution. This is the same status held by universities and colleges. This tax exemption requires that all resources of the Roosevelt Institution and its chapters must be used only for charitable, scientific, literary, or educational purposes.

The benefit of these restrictions is that we are now able to receive donations and other types of income without paying taxes, while our donors are also allowed to write off their donations on their tax returns each year.

The grant and continuation of our 501(c)(3) status is absolutely critical to our organization's success. The loss of this status would result in back taxes being due to the IRS for every donation we have ever received. The importance of this memo cannot be overstated.

The policies outlined below are designed to prevent any chapter or other agent of the Roosevelt Institution from jeopardizing the terms of our tax-exempt status, and will be included in the upcoming chapter contract. Failure to comply with these policies will result in disciplinary action, including the possibility of the termination of an offending chapter's status as an affiliate of The Roosevelt Institution.



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Policy

Fundamentally, by granting us tax-exempt status the government now views our activities as necessarily being both *educational* and *for the benefit of the greater public*. This changes how we act as chapters and as an organization in several ways, many of which are obvious but some of which are not.

The following guidelines fall into three categories:

- 1) Endorsement of candidates
- 2) Coordination with or participation in political campaigns
- 3) Lobbying or taking positions on specific legislation

These three categories will be addressed in detail below.

1) Endorsement of candidates

The Roosevelt Institution CANNOT endorse candidates under any circumstances.

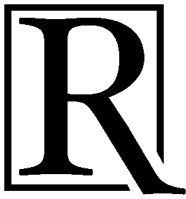
Note that this includes all types of elections, including local, state, federal, and those occurring on your campus. This is simultaneously both the easiest pitfall to avoid and the one with the gravest consequences. Unfortunately, there is no wiggle room, no grey area, and there are no second chances. If the Roosevelt Institution or any of its chapters endorses a political candidate, our tax-exempt status will immediately come under fire.

The easiest way to get in trouble because of a political candidate is to have a large number of the members of your chapter work for a candidate's campaign. Your members are of course free to do this as private citizens, but it is absolutely essential that you make clear to the candidate that they are not being endorsed by your chapter of the Roosevelt Institution.

2) Coordination with or participating in political campaigns

While political campaigns and candidates are welcome to use Roosevelt Institution publications or policy pieces for their platforms, Roosevelt Institution chapters cannot contract or coordinate with campaigns (including candidates, propositions, and ballot initiatives) to develop policy for the specific purpose of supporting that campaign's or candidate's platform.

On the other hand, Roosevelt Institution chapters are allowed and in fact encouraged to undertake research and policy development for legislative bodies or government agencies. This is in keeping with our charter to educate and act in the interest of the greater public good and creates an ideal avenue for the ideas of students to reach the world of public policy.



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In addition, any arrangements with outside organizations that may involve financial transactions should be cleared with the Roosevelt National Director of Legal Affairs and the Executive Director of the Roosevelt Institution before proceeding or signing any such agreements.

3) Lobbying or taking positions on specific legislation

The Roosevelt Institution cannot use a significant portion of its resources to lobby or take positions at the local, state, or federal levels, including the following:

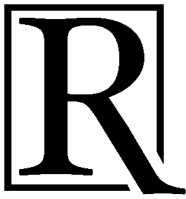
- Specific pieces of legislation
- Propositions or ballot initiatives
- Regulations
- Executive branch decisions
- Appointments
- Litigation

Since some policy pieces published by the Roosevelt Institution could be construed to support or oppose particular issues, all policy published by the Roosevelt Institution will be considered the opinions exclusively those of Roosevelt's members and not the views of the Roosevelt Institution, or any of its chapters, centers, advisors, or affiliates.

It should also be noted that this includes both attempts to influence particular pieces of legislation by contacting policymakers, which is known as “lobbying”, as well as attempts to influence the opinions of the general public in a similar way, which is known as “grassroots lobbying”. Grassroots lobbying includes such activities as letters to the editor, op-eds, press releases, or announcements on the web site that would mention particular pieces of legislation

Op-eds that simply address public policy or political issues in a general way are, of course, part of what the Roosevelt Institution does and are highly encouraged. Chapters and their membership are asked to use their best judgment on whether an opinion comes too close to backing a specific piece of legislation or other activity listed above, and they are asked to check with Roosevelt National before proceeding should there be any doubt.

For any new project that may include activities that could be construed as lobbying or taking positions on particular issues, a notice must be submitted to the appropriate members of Roosevelt National, including the Director of Legal Affairs, who will make a decision as to whether a full proposal is necessary.



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Notes

It will always be the responsibility of the chapter to notify the Roosevelt National of any activities on the part of its members or chapter that could be construed as violating the terms of this memo.

Please direct all questions related to this matter to:

Nate Loewentheil

Executive Director

Nate.loewentheil@rooseveltinstitution.org

(443) 690-6189