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**Commander in Chief**  
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**General Order #14**  
**Series 2020-2021**  
**13 April 2020**

**Lobbying**

1. **Introduction.** GO #35, Series 2019-2020, dated 14 August 2020, was a prudent measure to keep the SUVCW from any inadvertent violations while the 501(c)3 status of subordinate organizations was still under review by the IRS. The IRS has since granted that status, and the Order has had sufficient time to investigate and understand the rules for lobbying to develop long term guidance for Departments, Camps and SVR Units.
2. **Revocation of GO #35.** Therefore, the aforesaid GO #35 is hereby revoked and replaced with the following guidance regarding lobbying.
3. **Status of the SUVCW.** The National Organization, subordinate Departments, Camps, and Sons of Veterans Reserve Military Districts and Units are now considered 501(c)(3) entities.
4. **General Rules on Lobbying and Definitions.** In general, a 501(c)(3) organization can do a limited amount of lobbying (attempting to influence legislation), but too much could jeopardize its tax-exempt status (i.e., it cannot be a substantial part of its activities).
  - a. Legislation includes action by Congress, any state legislature, any local council, or similar governing body, with respect to acts, bills, resolutions, public referendum, ballot initiative, constitutional amendment, or similar procedure.
  - b. Legislation does not include actions by executive, judicial, or administrative bodies.
  - c. An organization will be regarded as attempting to influence legislation if it contacts, or urges the public to contact, members or employees of a legislative body for the purpose of proposing, supporting, or opposing legislation, or if the organization advocates the adoption or rejection of legislation.
5. **Scope of Permitted Lobbying.** The National Organization, subordinate Departments, Camps, and Sons of Veterans Reserve Military Districts and Units are permitted to undertake a limited amount of lobbying as long as the subject of the lobbying is directly related to one of the six purposes stated in the SUVCW's Congressional Charter (36 USC, Chapter 2003, §200302), and in particular to the following:
  - To perpetuate the memory of the Grand Army of the Republic and the men who saved the Union in 1861 to 1865.
  - To assist in every practical way in preserving and making available for research documents and records pertaining to the Grand Army of the Republic and its members.

- To cooperate in honoring all those who have served our country in any war.
- a. The following limited lobbying activities are allowable activities for Departments, Camps, and SVR subordinate units once the CinC has granted his written permission (see paragraph 7, below):
  - 1) The encouragement of members and non-members to write letters;
  - 2) Conduct educational meetings to inform the public about planned projects and events. Education sessions for current legislative leaders and potential candidates for elected office may be conducted as long as the information is offered to all parties and candidates without partisanship;
  - 3) prepare, and distribute educational materials or otherwise consider public policy issues in an educational manner that does not jeopardize our tax-exempt status;
  - 4) Testify at public hearings;
  - 5) Provide research, analysis, and commentary;
  - 6) Join amicus curiae briefs (additional permission is required on a case-by-case basis).
- 6. **Restrictions and Prohibitions.** Lobbying shall remain nonpartisan. It is prohibited to conduct or engage in political campaign activities to intervene in elections to public office. The Johnson Amendment to the 1954 Tax Code applies to all 501(c)(3) organizations, not just religious 501(c)(3) organizations. This includes, but is not limited to the following restrictions:
  - a. At no time will any Department, Camp, or SVR subordinate unit of the Sons of Union Veterans of the Civil War, contribute or otherwise donate funds to any political campaign;
  - b. At no time will any Department, Camp, or SVR subordinate unit raise funds for candidates in any manner;
  - c. At no time will any Department, Camp, or SVR subordinate unit publicly support or oppose any candidates;
  - d. At no time will the National, Departments, Camps, or SVR subordinate units post partisan political messages on any social media platform (e.g., Facebook, Twitter, Tumblr, Reddit, Imgur, Gab, etc.) or on organizational websites;
  - e. At no time will the National, Departments, Camps or SVR subordinate units engage in ad hominem criticism of public officials, or give the appearance thereof (including but not limited to attacks on one's personal characteristics or one's status or qualifications);
  - f. At no time will the National, Departments, Camps or SVR subordinate units connect, compare, or assess the organization's position on an issue(s) with voting recommendations for or against candidates for office in any election(s). This prohibition includes but is not limited to making and/or distributing voter guides for or against candidates;
  - g. At no time will the National, Departments, Camps, or SVR subordinate units, during an election, compare the organization's issue position with that of a candidate.
- 7. **Permission to Lobby.** Prior permission of the Commander-in- Chief of the Sons of Union Veterans must be obtained before any Department, Camp, or SVR subordinate unit conduct any lobbying efforts whatsoever.
  - a. Requests for permission must be made in writing to the Commander-in-Chief, a duplicate copy to be filed with the National Executive Director, National Treasurer, and National Counselor in

writing or by electronic means. No lobbying activities will take place prior to receiving the Commander-in-Chief's written permission under penalty of suspension. Copies of the aforesaid written requests and permissions will be maintained on file by the Executive Director and National Treasurer.

- b. Once the lobbying activity has been completed, the Department, Camp, or SVR subordinate unit which was engaged in a lobbying effort shall report to the Commander-in-Chief as follows:
  - 1) Who was contacted and on what date(s);
  - 2) What was discussed, and any other relevant information concerning the lobbying activities, including how many hours were spent;
  - 3) The report shall include copies of any written communications to and from the party(s) which were lobbied;
  - 4) For in-person (face to face) meetings, a synopsis of the conversation(s) shall be attached.
8. **Rights of Brothers as Private Citizens.** Brothers are free to communicate as private citizens with their local, state, or national representatives on any legislation; however, in this case, they must refrain from mentioning or otherwise implying they are representing the SUVCW, nor may they use letterhead of the SUVCW National Organization, Department, Camp, or SVR Military District or Unit.
9. **Penalties for Non-Compliance.** As the failure of a Department, Camp, or SVR subordinate unit to comply with this order may jeopardize our 501(c)3 tax exempt status, the National Organization must practice prudence and take action for the good of the Order against any subordinate body which fails to follow this General Order, namely suspension as well as any other actions as necessary to ensure the Order retains its 501(c)3 tax exempt status.

Ordered this 14th Day of April, 2021



Brian C. Pierson  
Commander-in-Chief  
Sons of Union Veterans of the Civil War

Attest:

*Jonathan C. Davis*  
Jonathan C. Davis  
National Secretary  
Sons of Union Veterans of the Civil War