# 2. Fundraising and Free Speech

In 1980, the Supreme Court held that a town ordinance that regulated doorto-door or on-street solicitation of contributions was unconstitutionally overbroad.

Village of Schaumberg v. Citizens for A Better Environment, 444 U.S. 620 (1980).

The ordinance allowed solicitations only if the soliciting organization could show,
in applying for a permit, that 75% of its receipts would be used directly for
charitable purposes. Salaries or commissions for solicitors and administrative costs
and overhead could not be considered as used directly for charitable purposes
under the ordinance.

The Court, in an 8-1 decision, concluded that, although soliciting financial support is subject to reasonable regulation, the <u>Schaumberg</u> ordinance was drafted more broadly than reasonably necessary to regulate solicitation. As a result, the ordinance interfered with First and Fourteenth Amendment guarantees of the right of free speech and assembly.

Although it may not be apparent at first how solicitation of funds can be equated with the exercise of free speech, the Court was concerned that the ordinance in <u>Schaumberg</u> would prevent fundraising organizations that necessarily had high administrative costs from disseminating information from door-to-door or on the street. The organization in <u>Schaumberg</u> used a substantial part of its receipts for the salaries of its door-to-door solicitors, who distributed information on environmental issues as they asked for contributions. Without a salaried staff of solicitors, the organization would have been less able to obtain the help needed to make its information available to the public. The strict 75% requirement discouraged fundraising and public contacts by organizations that relied primarily

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### **Table of Contents Sample Fundraising Speeches**

- 1. Understanding the eBook Sample Fundraising Speeches
  - The Rise of Digital Reading Sample Fundraising Speeches
  - Advantages of eBooks Over Traditional Books
- 2. Identifying Sample Fundraising Speeches
  - Exploring Different Genres
  - $\circ\,$  Considering Fiction vs. Non-Fiction
  - Determining Your Reading Goals
- 3. Choosing the Right eBook Platform
  - Popular eBook Platforms
  - Features to Look for in an Sample Fundraising Speeches
  - User-Friendly Interface
- 4. Exploring eBook Recommendations from Sample Fundraising Speeches

- Personalized Recommendations
- Sample Fundraising Speeches User Reviews and Ratings
- Sample Fundraising Speeches and Bestseller Lists
- 5. Accessing Sample Fundraising Speeches Free and Paid eBooks
  - Sample Fundraising Speeches Public Domain eBooks
  - Sample Fundraising Speeches eBook Subscription Services
  - o Sample Fundraising Speeches Budget-Friendly Options
- 6. Navigating Sample Fundraising Speeches eBook Formats
  - o ePub, PDF, MOBI, and More
  - Sample Fundraising Speeches Compatibility with Devices
  - Sample Fundraising Speeches Enhanced eBook Features
- 7. Enhancing Your Reading Experience
  - Adjustable Fonts and Text Sizes of Sample Fundraising Speeches
  - Highlighting and Note-Taking Sample Fundraising Speeches
  - Interactive Elements Sample Fundraising Speeches
- 8. Staying Engaged with Sample Fundraising Speeches
  - o Joining Online Reading Communities
  - Participating in Virtual Book Clubs
  - Following Authors and Publishers Sample Fundraising Speeches
- 9. Balancing eBooks and Physical Books Sample Fundraising Speeches
  - Benefits of a Digital Library
  - Creating a Diverse Reading Collection Sample Fundraising Speeches
- 10. Overcoming Reading Challenges
  - Dealing with Digital Eye Strain
  - Minimizing Distractions
  - Managing Screen Time
- 11. Cultivating a Reading Routine Sample Fundraising Speeches
  - Setting Reading Goals Sample Fundraising Speeches
  - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Sample Fundraising Speeches

- Fact-Checking eBook Content of Sample Fundraising Speeches
- Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
  - Utilizing eBooks for Skill Development
  - Exploring Educational eBooks
- 14. Embracing eBook Trends
  - Integration of Multimedia Elements
  - Interactive and Gamified eBooks

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