

From: [Carolyn Martin](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Comments on 8 CCR 1505-8 Lobbyist Regulation
Date: Thursday, November 21, 2019 10:31:23 AM

Comments on Changes to 8 CCR 1505-8 Rules Concerning Lobbyist Registration

Clarity of definition concerning professional lobbyists (Rule 1.6):

I work for a non-profit organization and watch over legislation and rulemaking that might impact the members of the organization. In the old rules “client” was defined, the new rules do not define this. As I look at my relationship with my employer, I don’t consider them a client.

Concerning mass media communication (Rule 2.5 (G)):

I contribute to my organization’s blog on a regular basis. It is still not clear to me how this is an expense on my part or how to account for this in the electronic filing. Because it is a part of my employment, the rule doesn’t really fit my situation as it says “amount given to the entity”.

Registering for “expenditures for gifts...in the aggregate amount of two hundred dollars” (CRS 24-6-302):

For the past several years, the organization I work for provides breakfast for all the legislators which costs more than \$200. They were instructed to register in the system and account for this expenditure. There is nothing in these rules that reflect that type of disclosure. Will this process change? Will they have to register? How will they disclose this expenditure?

Concerning the definition of legislation (Rule 1.4):

I agree with the other lobbyists that the expanded definition of legislation is problematic for the work we do.

Thank you,
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