

Andrea Gyger

From: Ali Mickelson <mickelson@coloradofiscal.org>
Sent: Monday, August 19, 2013 3:33 PM
To: SoS Rulemaking
Subject: Comments on Proposed Changes to Lobbying Rules

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To Whom it May Concern,

Please find our general comments about the proposed lobbyist rules changes below:

As a nonprofit organization, we feel that it is inaccurate to define our staff members as "professional lobbyists". Professional lobbyist implies that our profession is lobbying and that we are hired with the exclusive purpose of lobbying. This is not the case for us or for most nonprofit advocacy organizations. We understand that the statute does not draw a distinction but we see these rules as an opportunity to distinguish between lobbying professionals and the professional that occasionally lobbies as part of the mission of their organization.

We would like to see a more appropriate definition for the nonprofit advocates who incidentally do lobby work at the Capitol. We feel there should be another category of lobbyist that includes those who work in a policy or communications arena and do some lobbying work as a incidental component of working for our employer, but certainly not as the main or only component. Even simply "registered lobbyist" was more appropriate for nonprofit employees who occasionally takes the product of their work to the Legislature or to other decision makers.

Furthermore, as a nonprofit, non-professional lobbying organization, we find the format used for disclosure reporting very confusing. The format and categories are very clearly tailored to professional lobbying work and do not make much sense when applied to non-professional lobbying and advocacy. We would like to see another, more simple format for non-professional lobbyists. In particular, the filing page that a registered lobbyist fills out when they have no expenses to report gives two options, neither of which seems applicable to our situation: we are always employees of the organization for whom we occasionally lobby and even if the legislature is not in session, by definition we could possibly be engaging in activities that would constitute lobbying. We would happy to provide further suggestions on what this different type of disclosure reporting should look like.

We appreciate your efforts to improve the reporting system and are fully supportive of lobbying disclosure. Thank you for seeking our input.

Sincerely,

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Ali Mickelson, Esq.

Tax Policy Attorney

Colorado Fiscal Institute

1905 Sherman St., Suite 225

Denver, CO 80203

720-379-3019 x 222

mickelson@coloradofiscal.org