

From: [Amanda Duerr](#)
To: [Olson, Andrew \(CFB\)](#)
Subject: Comments on Proposed Lobbying Rules
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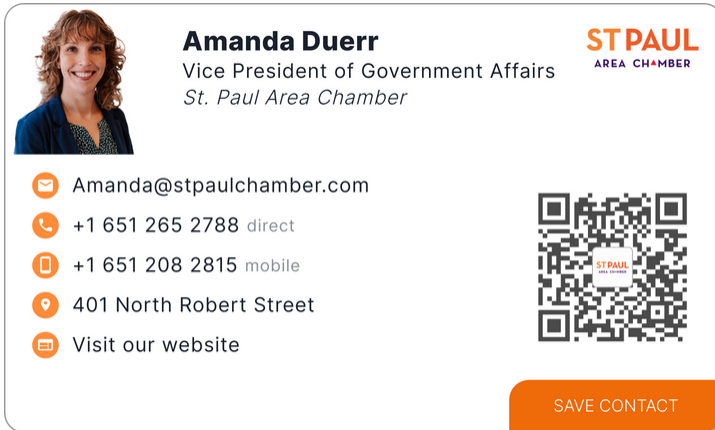
Dear Andrew:

Although there are numerous concerns and sources of confusion with the new lobbyist reporting statutes/proposed rules, I will highlight a few that come top of mind to my organization and members:

- First and foremost, I am concerned about the proposed rulemaking surrounding the reporting of "original source of funding" for membership organizations. The St. Paul Area Chamber has roughly 1,700 members. Dues support the operation of the entire organization, not just government affairs. Is the CFB suggesting that principles will need to report the dues paid by every member (that pays over \$500)? Is the CFB planning to make the reporting form large enough for principles to literally enter thousands of individual members of their organization? Does that not seem administratively burdensome?
- As an organization that engages in advocacy at both the state and political subdivision level, members are concerned about interactions with government that will now trigger lobbyist registration. A few examples:
 - CEO's interacting with Governor/mayors now needing to calculate their time/salary and monitor if a specific ask is made to determine if a lobbying threshold is met.
 - Employees interacting with political subdivisions on normal course of business: the rules surrounding "routine" interactions do not provide much clarity, nor does the explanation of when interactions with appointed officials (especially unelected commissions/staff with decision-making authority) are lobbying.
 - Consider especially developers working on housing/business developments. Numerous decisions need to be made over the course of a project, many of which require approval by council or parks/planning commissions or require ongoing conversation with departmental staff. Most of these conversations are conducted by employees well outside the realm of a typical lobbyist (planning, design, finance, engineering, etc). Under the proposed rules, many aspects of finalizing a development agreement/project would be considered lobbying, which is burdensome.
- The distinction between a subject matter expert being "invited" to testify or choosing to testify in the CFB considering whether the testimony is lobbying activity is not practical from a free speech perspective.
- Representing several non-profit members, I'm also concerned about the differences between what the state and federal government consider lobbying as it pertains to an organization's


tax-exempt status. Significantly more guidance is needed in this area.


As the CFB works to provide clear guidance to the regulated lobbying community, please consider these outstanding questions and concerns.





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