

**From:** Rob Harris  
**To:** [SoS Rulemaking](#)  
**Subject:** Western Resource Advocates" comments on working draft Lobbyist Regulation Rules  
**Date:** Thursday, March 8, 2018 11:43:44 AM  
**Attachments:** [image002.png](#)

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Dear Secretary Williams,

Thank you for the opportunity to comment on your office's pending recodification of Colorado's Rules Regarding Lobbyist Regulation, per the notice that your office issued February 23, 2018. Western Resource Advocates (WRA) is non-profit organization dedicated to protecting the West's land, air, and water. WRA currently has five staff members registered as lobbyists in Colorado.

WRA writes to request that you reject proposed Rule 2.2.4 which would require a registered lobbyist to file an amended report with 72 hours of any change in position on a bill. We respectfully submit that this proposed change is burdensome and adds little value to the statements of position that are currently available in the monthly reports. If there is interest in a stakeholder's current position such that a monthly report is not sufficiently timely, we believe that the best practice is to contact that stakeholder's representative directly for their most current position. Such contacts can foster constructive dialogue, and help ensure that all interested parties' time is spent productively.

Thank you for your consideration of these comments. WRA respectfully requests that you reject proposed Rule 2.2.4.

Sincerely,

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PROTECTING THE WEST'S LAND, AIR & WATER

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