From: Donna Brosemer
To: SoS Rulemaking

Subject: Comments - working draft Lobbyist Regulation Rules

Date: Friday, March 9, 2018 2:13:16 PM

Rule 2.2.4

This proposed rule creates chaos in an already-chaotic process. As bills are amended, and strike-belows are adopted, usually without any opportunity for anyone but committee members to read them, our positions change based upon changing language. As we may be able to work out some of those changes, our positions may change again. Just trying to keep up with what constitutes a 72-hour compliance period becomes an unrealistic, impractical, and seemingly punitive preoccupation when we are trying to resolve issues of importance to our clients. The current process works. Please leave it alone.

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