

**From:** Dianne Criswell  
**To:** [SoS Rulemaking](#)  
**Cc:** [Gini Pingnot](#); [Eric Bergman](#); [Michael Valdez](#); [Kevin Bommer](#); [Allison Wright](#)  
**Subject:** Comments on 8CCR 1505-8 -- Lobbyist and Lobbying Firm Reporting Requirements  
**Date:** Tuesday, April 17, 2018 5:36:26 PM

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To whom it may concern,

I apologize for the late response for comments on the proposed changes to 8CCR 1505-8 (attached).

#### Disclosure – Payments/Expenditures

In the Proposed Rules related to Lobbyist Regulation, I do not see reference in the proposed Rule 3.2 (Lobbying Firms – Disclosure) to the exception in CRS 24-6-302(2.5)(c), which provides that a firm engaged in lobbying for a trade association, public interest group, or governmental organization need not disclose dues, assessments or fees. Without that clarification that no disclosure of our membership dues is required, I believe many non-profits who advocate on behalf of governmental entities, including the Colorado Municipal League, may be uncertain what obligation they have as “lobbying firms” to disclose under proposed Rule 3.2.2.(B).

Further, under proposed rule 3.2.2.(D), our lobbying “expenditures” are for lobbyist compensation – and the disclosure of which, even in aggregate, may raise privacy concerns. Further, I do not see reference to the exception for reasonable expenses from disclosure in CRS 24-6-302(2) in the Proposed Rules.

#### Disclosure of Clients

In the disclosure statement in Proposed Rule 3.2, the lobbying firm must file a monthly disclosure that provides a name and address of each client – and further detail as to each client. Proposed Rule 3.2.2.(A). Proposed Rule 3.2.2.(A)(3) requires a “description” of the association – but not as an alternative to listing the name and address of each client. CML has 270 municipal members – and there is no single “client” in each municipality. I do not know how we would report client information under this proposed rule.

Thank you for the opportunity to provide input – and please let me know if you have any questions or need additional information.

Sincerely,



**Dianne Criswell, J.D.**  
**Legislative Counsel**

Colorado Municipal League  
1144 Sherman Street, Denver, CO 80203  
(p) 303-831-6411 / 866-578-0936 • (f) 303-860-8175  
[dcriswell@cml.org](mailto:dcriswell@cml.org) • [www.cml.org](http://www.cml.org)

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