

November 15, 2019

The Honorable Jena Griswold, Secretary of State
Department of State
1700 Broadway
Denver, CO 80290

Via email to: sos.rulemaking@sos.state.co.us

Re: Proposed rules and changes to the

Dear Secretary Griswold,

Colorado Common Cause respectfully submits comment regarding edits and additions concerning proposed Lobbyist Rules (8 CCR 1505-8).

Colorado Common Cause is a nonpartisan, grassroots organization dedication to upholding the core values of American Democracy. We work to create open, honest, and accountable government that serves the public interest; promote equal rights, opportunity, and representation for all; and empower all people to make their voices heard in the political process.

We support a strong democracy where everyone's voice is heard and everyone plays by fair and commonsense rules. Making sure that lobbyist follow all the relevant laws and regulations is key to making sure .

We would like to submit the following suggestions and comments:

We propose a further clarification to existing rule 1.6 in light of recent legislation with addition in capital letters: "Professional lobbyist" means a person, a business entity, including a sole proprietorship, or an employee of a client, AND INCLUDING A PERSON WITH ATTORNEY-CLIENT PRIVILEGE who is compensated by a client, another professional lobbyist, or lobbying firm for lobbying services.

We approve of the change concerning the amendment to Rule 4.1.2 that removes the requirement that a complaint against a lobbyist be notarized. That is a completely unnecessary burden.

It might prove beneficial in Rule 4.1.2 to specifically add "witnesses to the alleged violation" or similar under (f).

Thank you for the opportunity to comment.

Sincerely,

Amanda Gonzalez

Executive Director
Colorado Common Cause