

From: [Bryan Lake](#)
To: [Sigurdson, Jeff \(CFB\)](#)
Subject: Proposed amendments to draft rules re lobbyist registration
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Mr. Sigurdson,

I am writing on behalf of the MN State Bar Association to request that the Campaign Finance Board consider two proposed modifications to the draft rules regarding lobbyist registration.

First, we suggest including language to clarify that communications concerning litigation and judicial proceedings are not lobbying. (For example, litigation with a city could involve settlement negotiations that involve elected officials or major expenditures.) We suggest that the following be considered exempt: "A party or a party's representative communicating with a public official or a local official concerning a legal dispute involving the political subdivision of the public official or local official."

Second, the draft rules exclude from the definition of "approval by an elected local official" the acts of "issuing a government license, permit, or variance that is routinely provided when the applicant has complied with the requirements of existing state code or local ordinances." [Page 23 lines 35 and 36]. We believe it would be appropriate to include the same exemption under the preceding subpart (i.e. "An action that requires a vote of the governing body").

We appreciate the Board's consideration of these requests. Feel free to contact me at any time if you have questions or need more information.

Thank you,

Bryan Lake
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