Levy, Holly (JCOPE)

From: Jim Calvin
Sent: Tuesday, November 24, 2015 10:10 AM
To: Levine, Martin (JCOPE)
Subject: Comments on Proposed Advisory Opinion

Dear Mr. Levine -

Thank you for the opportunity to review and comment on the proposed advisory opinion regarding reporting obligations for a party compensated for consulting services in connection with lobbying activity.

I) We're getting pretty far afield here. Conceivably, a $50,000-a-year administrative assistant who spends 10% of his/her time scheduling LOB appointments for the registered lobbyist he/she works for could be captured by this definition.

II.) I agree that a consultant who attends or otherwise participates in a lobbying meeting with a public official is engaging in lobbying activity. But I don't understand why the definition of "direct interaction" would include actions that are indirect, such as writing a letter for someone else to use in their direct contact with the public official. Packing snowballs is not combat.

III.) While someone who packs snowballs should not be obligated to report, I agree that someone who both packs and throws snowballs should be required to do so.

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