

Comments to Proposed Staff Regulations

1. Additional Bi-monthly disclosure requirement: Bi-monthly reports must include specific disclosures of individual names of who was directly lobbied, and intended targets for grassroots lobbying. This is problematic because:

- **It exceeds JCOPE's authority** because it is seeking to unilaterally redefine the requirements under the Lobby Act (the act requires name of the person, organization OR legislative body being lobbied, not all three).
- **It creates a chilling effect** on officials willingness to meet with individuals who lobby, which undermines the intent of the Lobby Act to protect these opportunities
- **It is unnecessarily burdensome**, potentially requiring the record-keeping and reporting of hundreds of names for each report filed, and without any clear purpose

2. Social Media and direct/grassroots lobbying: specifies what is/is not lobbying when engaging on social media. This is problematic because:

- **It exceeds JCOPE's authority** because the legislature already defined lobbying in the Lobby Act and these provisions fundamentally change that definition.
- **It further complicates the law** rather than offering clarification, creating a gray area that could have broad impact and open floodgates of what is reportable.