

ASSOCIATION OF CONNECTICUT LOBBYISTS

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TO: Government Administration and Elections Committee

FROM: Association of Connecticut Lobbyists (ACL)

DATE: February 6, 2015

RE: **SB 850** - AA Amending the Code of Ethics for Lobbyists to Redefine "Lobbying",
define "Grass Roots Lobbying" and Raise the Threshold for Lobbyist Registration

Testimony

The Association of Connecticut Lobbyists (ACL) is a professional association whose membership includes 150 registered communicator lobbyists. ACL has concerns with the unintended consequences should this bill become law.

First, the Association applauds the sensible raising of the threshold amount needed from \$2,000 to \$3,000 to trigger registration, as well as the section of the bill excluding certain transportation activities from the definition of expenditure in the furtherance of lobbying.

Second, the Association has concerns with the definition of grassroots lobbying and when that activity triggers registration as a lobbyist.

Of most concern is the language at lines 176-179 of the Raised Bill that includes "organizing grass roots lobbying" as "soliciting others to communicate". This would have the effect of not only triggering a registration for anyone who pays for grassroots activity but also triggering registration for anyone merely organizing that grass roots lobbying.

This seems to overreach what constitutes a professional lobbyist by spreading a wide net over who that includes. This could include public relations firms, member businesses of associations, or any person or business that is doing any of the very broad activities covered under the

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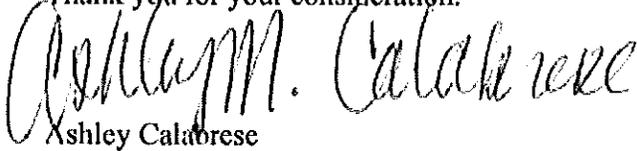
definition of "grass roots lobbying". The Association does not believe this was the intention of those proposing these changes, but the way the bill is drafted would have that effect.

Organizing grassroots lobbying without the compensation portion should not be included in the definition of "soliciting others to communicate". We believe the issue could be avoided by removing "(ii) organizing grassroots lobbying" from line 179.

Finally the Association feels the definition of "grass roots lobbying" is overly broad and needs to be better defined. For example, what exactly is "a segment of the general public"? Could this be one person? Two? Seven? Also, "expressing a view" is very vague and too open to interpretation.

The Association looks forward to working with the Office of State Ethics and the Committee on this issue.

Thank you for your consideration.

A handwritten signature in cursive script that reads "Ashley M. Calabrese".

Ashley Calabrese
President
Association of Connecticut Lobbyists