

*Email received November 30, 2021*

Dear Chair Jarrett and Commissioners:

Thank you for your thoughtful consideration of public comment.

I am writing to refine my verbal comments made on behalf of the LWVWA at your October 28, 2021 meeting. The League supports the overall intent of the proposed legislation including the work to define grassroots lobbying and align reporting with the legislative session. (Sec. 17) The concern we have is the \$500 threshold for reporting.

The League supports the PDC's mission to provide timely and meaningful access to accurate information about the financing of political activity. The League also believes that democratic government depends upon informed and active participation in the political process. We apply a diversity, equity, and inclusion lens to our work and consider intended and unintended outcomes. I urge the Commission to consider whether the \$500 threshold for reporting is meaningful and material to the public interest, when balanced with the impact to people and nonprofit organizations and other associations, who may not be able to comply with weekly reporting and use their limited resources to influence legislation that impacts their lives.

As an example, the Maine Commission on Governmental Ethics and Election Practices (report template is attached) uses an expenditure threshold of \$2,000 in a calendar month, and also limits the expenditure types to the cost of printed lobbying materials, advertising, professional services, etc. and does not require an allocation of time spent by in-house employees or *office expenses like rent and secretarial assistance (Sec. 17 (2) (e))*.

The League appreciates the PDC focus on filer assistance for successful compliance as this promotes accurate information and active participation. Would it seem reasonable that the public interest may be better served if the threshold for grassroots lobbying reporting was higher than \$500? Does the cost of the additional staff and regulated community time and effort reporting a few hundred dollars in weekly reports exceed the benefit to the public?

Thank you for your consideration.

Best regards,

Cindy Madigan  
Money in Politics Issue Chair  
League of Women Voters of Washington



## 2021 Grassroots Lobbying Report – 130<sup>th</sup> Legislature

Please refer to the last page for instructions and filing schedule.

Spender Information		
Spender	Contact Person	
Mailing Address		
City	State	Zip
Email	Phone	Fax
Description of business activity or mission of the Spender		
Legislative Actions		
List all Legislative Actions that are the subject of the grassroots lobbying. Attach additional pages as needed.		
L.D. / L.R. Number	Title	Support / Oppose
Expenditure Overview		
List the total expenditures in aggregate incurred in the calendar month for grassroots lobbying (itemized on Schedule A).		
Amount		
Month Covered by Report:		
Certification		
<p>I, _____, affirm that the information contained in this report is true and complete  <small style="margin-left: 100px;">Name</small></p> <p>and that no information is knowingly withheld to the best of my knowledge.</p>		
Name	Date	

Spender: \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_  
 Schedule A only  
 Duplicate as needed.

## SCHEDULE A Grassroots Lobbying Expenditures

- Enter all expenditures made to influence the Legislative Actions by grassroots lobbying listed on page 1.
- The Expenditure Type Codes are listed in the below chart.
- The Remarks section is to provide a more detailed description of the purchase. (For the LIT code the Remarks could be "Purchase of flyers to be distributed door-to-door by volunteers.")

EXPENDITURE TYPE CODES			
LIT	Printed grassroots lobbying materials (palmcards, signs, stickers, flyers etc.)	POL	Polling and survey research
MHS	Mail house and direct mail (design, printing, mailing, and postage)	POS	Postage for US Mail and mailbox fees
ONL	Social medial and online advertising only	PRO	Professional services (graphic design, legal services, web design)
OTH	Other	RAD	Radio ads and production costs only
PER	Personnel and campaign staff, consulting, and independent contractors; not in-house employees	TVN	TV/Cable ads, production, and media buyer costs only
PHO	Phones (phone banking, robocalls, and texts)	WEB	Website and internet costs (website domain and registration, etc.)

<b>Date</b>	<b>Payee Name</b>			<b>Amount</b>
	<b>Mailing Address</b>			
<b>Code Type</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
	<b>Remarks (Required)</b>			
<b>Date</b>	<b>Payee Name</b>			<b>Amount</b>
	<b>Mailing Address</b>			
<b>Code Type</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
	<b>Remarks (Required)</b>			
<b>Date</b>	<b>Payee Name</b>			<b>Amount</b>
	<b>Mailing Address</b>			
<b>Code Type</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
	<b>Remarks (Required)</b>			
<b>Date</b>	<b>Payee Name</b>			<b>Amount</b>
	<b>Mailing Address</b>			
<b>Code Type</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
	<b>Remarks (Required)</b>			
<b>Date</b>	<b>Payee Name</b>			<b>Amount</b>
	<b>Mailing Address</b>			
<b>Code Type</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
	<b>Remarks (Required)</b>			

**Total expenditures this page only ⇒**

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Spender: \_\_\_\_\_

Page \_\_\_\_ of \_\_\_\_  
Schedule B only  
Duplicate as needed.

## SCHEDULE B Original Sources

Any person who pays \$1,000 or more in a lobbying year to any other person for the purpose of grassroots lobbying is an original source, except if the payments are membership dues to non-profit corporations. If an original source is a for-profit or non-profit corporation or limited partnership, then that organization is the original source and not its individual members.

Complete this section if any funds were received by the person required to complete this report for the purpose of the reported grassroots lobbying activity.

<b>Name of Source</b>		<b>Payment Amount</b>	
<b>Mailing Address</b>			
<b>City</b>	<b>State</b>	<b>Zip</b>	
<b>Name of Source</b>		<b>Payment Amount</b>	
<b>Mailing Address</b>			
<b>City</b>	<b>State</b>	<b>Zip</b>	
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<b>Mailing Address</b>			
<b>City</b>	<b>State</b>	<b>Zip</b>	
<b>Name of Source</b>		<b>Payment Amount</b>	
<b>Mailing Address</b>			
<b>City</b>	<b>State</b>	<b>Zip</b>	

## Instructions and Definitions for Grassroots Lobbying Report

*(Please refer the statutes for exact definitions and requirements.)*

“Grassroots lobbying” means to communicate with members of the general public to solicit them to communicate directly with any covered official for the purpose of influencing legislative action, other than legislation that is before the Legislature as a result of a direct initiative, when that solicitation is made by:

- A. A broadcast, cable or satellite transmission;
- B. A communication delivered by print media;
- C. A letter or other written communication delivered by mail or by comparable delivery service;
- D. A communication delivered by e-mail, a website or any other digital format;
- E. Telephone; or
- F. A method of communication similar to those listed in paragraphs A to E.

Grassroots lobbying does not include a person communicating with the person’s stockholders, employees, board members, officers or dues-paying members. (3 M.R.S. § 312-A(7-B))

“Covered official” means an official in the executive branch, an official in the legislative branch, a constitutional officer, the Governor and the Governor’s cabinet and staff. (3 M.R.S. § 312-A(4-B))

“Legislative action” means a bill, resolution, amendment, or other matter before the Legislature, legislative committee, or before the Governor for approval or veto. (3 M.R.S. § 312-A(8))

“Lobbying year” starts on December 1<sup>st</sup> and ends on November 30<sup>th</sup> of the following year. (3 M.R.S. § 312-A(15))

“Solicit” means to entreat, implore, urge, or ask. (3 M.R.S. § 312-A(14-A))

“Person” means an individual, corporation, proprietorship, association, professional association, labor union, firm, partnership, municipality or quasi-municipality, or group of persons acting in concert. (3 M.R.S. § 312-A(12))

*Expenditure Threshold.* When a person makes or incurs expenditures for grassroots lobbying exceeding \$2,000 in a calendar month, the purchaser must file a grassroots lobbying report. (3 M.R.S. § 317-A)

*Report Due Date.* A grassroots lobbying report is due on the 15<sup>th</sup> day of the month following the month the expenditure threshold was exceeded. (3 M.R.S. § 317-A)

### Filing Schedule

Report Name	Due Date	Report Period
December Grassroots Lobbying Report	January 15, 2021	December 1 – December 31
January Grassroots Lobbying Report	February 16, 2021	January 1 – January 31
February Grassroots Lobbying Report	March 15, 2021	February 1 – February 28
March Grassroots Lobbying Report	April 15, 2021	March 1 – March 31
April Grassroots Lobbying Report	May 17, 2021	April 1 – April 30
May Grassroots Lobbying Report	June 15, 2021	May 1 – May 31
June Grassroots Lobbying Report	July 15, 2021	June 1 – June 30
July Grassroots Lobbying Report	August 16, 2021	July 1 – July 31
August Grassroots Lobbying Report	September 15, 2021	August 1 – August 31
September Grassroots Lobbying Report	October 15, 2021	September 1 – September 30
October Grassroots Lobbying Report	November 15, 2021	October 1 – October 31
November Grassroots Lobbying Report	December 15, 2021	November 1 – November 30