



August 19, 2024

Minnesota Campaign Finance and Public Disclosure Board

190 Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

Re: Lobbying Definitions Study

Dear Minnesota Campaign Finance Board:

On behalf of the Greater Minnesota Partnership (“GMNP”), an organization focused on expanding economic prosperity in Greater Minnesota, thank you for the opportunity to weigh-in on the state’s campaign finance regulations. Members of the GMNP are nonprofits, Economic Development Associations, businesses, local chambers of commerce, and Greater Minnesota cities.

Should the laws regulating lobbying distinguish between lobbying public officials in state government and lobbying local officials in political subdivisions?

Yes, the laws regulating lobbying should distinguish between lobbying state officials versus lobbying local officials in political subdivisions.

Most of our members work regularly with local government to address community challenges and opportunities in a spirit of collaboration and for mutual benefit. The work our members do with local governments is different in nature than the advocacy and lobbying that they do at the state level. It would be unusual in Greater Minnesota communities to be advocating for changes to a city ordinance or around the allocation of resources, but most of our members regularly work with local governments on community issues in the normal course of business. These activities can include working with city staff and local government officials to address transportation issues with a development project or working with local government to develop a housing project as just two examples.

Members have expressed concerns that changing the requirements for this sort of activity to require reporting it to the Campaign Finance Board as lobbying would vastly expand the reporting requirements for these community groups in terms of the number of staff reporting and the breath of the activities they would need to report. This change could also potentially create issues for some members around their nonprofit status and would vastly expand the time and resources that organizations would be required to commit to reporting. MGNP members strongly encourage the Board to distinguish between activities lobbying public officials in state government and lobbying local officials in political subdivisions and to narrow those activities that constitute lobbying with respect to political subdivisions.

Feedback on the Definition of Local Government Employees as Lobbyists

Members have also expressed concern that the definition of lobbyist under Minn.Stat. 10A.01 Subd. 21 (2)(b)(4) is overly broad. Under the current definition, it’s easy for an employee of a political subdivision to spend more

than 50 hours in any month in the normal course of business doing work that meets the definition in (4). To ensure compliance with this statute, employees will need to track all hours doing qualifying work so in any given month they can report those activities if they exceed 50 hours. We urge you to narrowly construe the definition of local government employees as lobbyists.

Thank you again for giving us a chance to share our feedback. If you have questions, please contact me at darielle@gmnp.org.

Thank you,

A handwritten signature in black ink, appearing to read 'Darielle', with a long horizontal flourish extending to the right.

Darielle Dannen
Executive Director
Greater Minnesota Partnership