

From: [George Beck](#)
To: [Pope, Jodi \(CFB\)](#); [peggyleppik](#); [Bobmoilanen abelladonna](#); [ktomsich](#); [mwitte](#)
Cc:
Subject: Coordination rule
Date: Tuesday, September 19, 2017 9:28:05 AM

Dear Subcommittee Members and Jodi:

I will not be able to be at the 9/20 meeting due to a conflict, but I did want to respond to recent changes in the rule.

The changes to date include a progressive weakening of the rule accomplished outside of the statutory APA rulemaking process. The staff comments do not justify this apart from deletions "due to public comments." This procedure avoids the requirement of a Statement of Need as well as the agency's responsibility to explain changes. The unusually lengthy process utilized by the Board discouraged attendance at meetings by interested volunteer non-profits.

The staff changes made include exclusion of expenditures to reproduce candidate materials from the rule as well as the exclusion of children and the parents of a candidate from those who would not be able to direct expenditures. Also, independent expenditures used later in the election cycle by a candidate is now permissible.

In order to correct the defect, I think the Board should immediately proceed to hearing with its original rule and accept comment on the original draft.

George Beck
Chair
Minnesota Citizens for Clean Elections.