

To: Jodi Pope

From: George Beck, Chair, Minnesota Citizens for Clean Elections

Re: Comments on Possible Coordination Rules

Subp. 2.A. – The Democracy 21 model bill has the election segment as the period from the last general election to the next. This would bring in more activity and I think would be preferable.

Subp. 5 – The definition of agent is limited to the current election segment. The model act looks back 4 years. I think the current segment and the prior segment would be more appropriate since the people named would still be close to the candidate in the prior election segment.

Subp. 7 – Add an item I. – “An expenditure made by a spender that only raises funds for one candidate.” The greatest potential for circumvention of contribution limits exists with single candidate independent committees. They should be prohibited.

Subp. 8.H. – This item has the potential to be a loophole to the prohibition against a candidate raising funds for the independent committee. It’s a fine (invisible?) line between a candidate appearing to speak and the candidate promoting his or her election. This should either be deleted or at a minimum, the following language added – “unless the event is within 120 days of the primary or general election for the office that the candidate is seeking.” See Conn. Sec. 9-601C. (c).

Subp. 8.I. – Similarly, a potential loophole. It seems to allow a corporation to raise general treasury funds for the candidate.

Thank you for considering our comments.