

THOMAS P. GANNON, MEMBER  
CHAIRMAN  
HOUSE JUDICIARY COMMITTEE

BRIAN J. PRESKI  
CHIEF COUNSEL  
HOUSE BOX 202020  
ROOM 18, CAPITOL ANNEX  
HARRISBURG, PA 17120-2020  
(717) 772-6946

RECEIVED

99 MAR 25 AM 8:49



HOUSE OF REPRESENTATIVES  
REVIEW COMMISSION  
*House of Representatives*  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

ORIGINAL: 1997  
BUSH  
COPIES: McGinley  
Sandusky  
Legal  
Notebook

March 22, 1999

John J. Contino, Executive Director  
Pennsylvania State Ethics Commission  
309 Finance Building, P.O. Box 11470  
Harrisburg, PA 17108-1470

MAR 22 4 40 PM '99

Dear Mr. Contino:

In addition to the previous comments provided to the Act 93 committee by the Judiciary Committee of the House of Representatives on March 17, 1999 and March 19, 1999, please accept this additional clarifying comment.

On page 4 of the March 17, 1999, correspondence at Comment No. 4, the Committee requested that "The regulations should eliminate the option of dividing the total expenditure by the number of officials. Reporting should be based on the actual service received by the official." To clarify, it is the intention of the committee that this comment indicated that it desires that the regulations require that the same accounting methods, of the two options presented, be consistently applied to all officials present at a single event.

The Committee would also request that the regulations make clear that the accounting method employed by the lobbyist/principal in reaching the attributable amount be the most appropriate and practical for the event. For example, a large dinner group would dictate a pro-rata method whereas a smaller group where there was a disparity between the benefits conferred would lend itself to an actual accounting per individual.

If you or your staff have any questions or would like to discuss any of these points in greater detail, please let me know.

Very truly yours,

Brian J. Preski, Chief Counsel  
House Judiciary Committee

RECEIVED BY  
LEGAL DIVISION

MAR 22 1999

cc: **Honorable Matthew J. Ryan, Speaker**  
**Honorable John M. Perzel, Majority Leader**  
**Honorable William DeWeese, Minority Leader**  
**Honorable Thomas Gannon, Chairman, Judiciary Committee**  
**Honorable Kevin Blaum, Democratic Chairman, Judiciary Committee**  
**Edward C. Hussie, Chief Counsel to the Majority Leader**  
**Reizdan B. Moore, Chief Counsel to the Democratic Caucus**  
**Michael P. Edmiston, General Counsel, Democratic Caucus**  
**Vincent J. Dopko, Chief Counsel, State Ethics Commission**

COMMONWEALTH OF PENNSYLVANIA

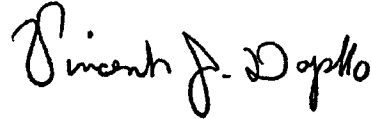
DATE: March 23, 1999

SUBJECT: Lobbying Disclosure Proposed Rulemaking (63-06)

TO: Robert E. Nyce, Executive Director  
IRRC  
Honorable F. Joseph Loeper, Chairman  
Senate Rules and Executive Nominations Committee

FROM: Vincent J. Dopko, Chief Counsel  
State Ethics Commission

ORIGINAL: 1997  
BUSH  
COPIES: McGinley  
Sandusky  
Legal  
Notebook



For your information, I am enclosing photocopies of the following comments as to the proposed Lobbying Disclosure Regulations (63-06).

Commentator(s)

Received at State Ethics Commission

Brian J. Preski, Chief Counsel  
House Judiciary Committee  
(additional clarifying comment)

March 22, 1999

VJD/mlj

Enclosure

cc: Honorable Thomas P. Gannon, Chairman  
House Judiciary Committee (without enclosure )  
Members, Lobbying Disclosure Committee (with enclosure)

RECEIVED  
99 MAR 25 AM 8:49  
STATE ETHICS COMMISSION