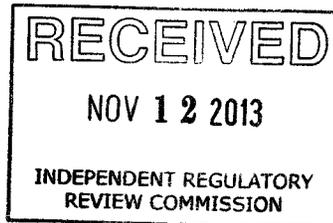


**Conrad
O'Brien**



Stephen MacNett
Attorney at Law
Direct Dial: 717.232.2141
Direct Fax: 717.232.3797
smacnett@conradobrien.com

3012

November 5, 2013

Carol Aichelle
Secretary of the Commonwealth
302 North Office Building
Room 302
Harrisburg, PA 17120

RE: Lobbying Registration Fee Increase

Dear Secretary Aichelle:

I write to share my concerns about your Department's proposed regulation which dramatically increases the registration fee under the Lobbying Registration and Reporting law. While I am loathe to discourage efforts to shelter the General Fund from spending pressures, I am convinced that the proposal as reviewed by IRRC goes well beyond reasonable in its planned form and should not be finalized unless changed dramatically.

The First Amendment enshrines the right to petition our government for redress of grievances as a fundamental right of Americans. Pennsylvania's Declaration of Rights in Article I of the Commonwealth's Constitution declares that Pennsylvanians have the right to "apply to those invested with the powers of government for redress of grievances". Those who need assistance in exercising these rights can secure assistance by dispatching advocates for their grievances and those advocates can be paid for their services or they can provide them without compensation.

While overseeing this advocacy and affording transparency regarding who is advocating – attempting to influence the outcome of governmental decisions – is a legitimate role for Government, that oversight must not chill the right to exercise these fundamental rights and it should not diminish the People's need for a measure of transparency. I fear that the proposed regulation, unwittingly, does both of those. For some, the spiked registration fee will keep them away from exercising their rights; others will slip underground with a resulting loss of transparency. A careful balancing is required; restraints on the exercise of the right to petition for redress of grievances must be minimal. The proposed fee tips the balance and should be scaled back in a major way. As noted above, I respect efforts to protect the General Fund but achieving that goal should not burden the exercise of the fundamental rights affected by the draft proposal.

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Further, on the fiscal impact minimalizing you seek, the revenues received from the taxation of lobbying services should be included when using the measuring stick.

By way of background, I am not a lobbyist and have no current plans to become one. I write simply because I find the fee hike, as proposed, to be bad policy; that is a personal view and is not indicative of the views of Conrad O'Brien, PC.

I strongly urge that the proposal be modified to advance a much more modest increase in the fee or in the alternative be withdrawn.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Stephen MacNett". The signature is written in black ink and is positioned above the printed name.

Stephen MacNett

SMC/ld

Cc: Honorable Lloyd Smucker
Honorable Matthew Smith
Honorable Daryl Metcalfe
Honorable Mark Cohen
Silvan Lutkewiffe