

June 5, 2020

Carol Quinn
Deputy Director of Lobbying Guidance
New York State Joint Commission on Public Ethics
540 Broadway
Albany, NY 12207

Re: Amendments to the Comprehensive Lobbying Regulations, Title 19 NYCRR Part 943

Transmitted electronically to: carol.quinn@jcope.ny.gov

Dear Ms. Quinn:

The following statement is submitted on behalf of myself, a registered lobbyist and member of the Empire State Society of Association Executives (ESSAE). I represent several small trade associations as a registered lobbyist and therefore have direct knowledge of the extremely limited resources these associations operate from. Yet they remain committed to adequately represent their members and their specific trade before state government. I endorse the comments and recommendations submitted by ESSAE regarding the Comprehensive Lobbying Regulations and recommend they be adopted in the final rule.

Volunteer advocacy engagement by association leaders is a limited yet not uncommon function and is undertaken because the associations do not have the means for professional representation sufficient to adequately cover their advocacy needs. Therefore, my agricultural trade association leaders volunteer their time and financial resources to advocate for their community because of their commitment to improve their community and their families.

In my opinion, the draft regulations impose financial hurdles that will discourage small trade associations from engaging in the democratic process. The draft regulations will render the essential requirement of interfacing with elected and appointed policy makers to those entities who can afford to invest additional resources into the additional compliance requirements. I strongly encourage the Commission to carefully evaluate the relative costs of compliance, for volunteer trade associations, and ensure that the final regulations do not increase the financial burden of participating in our democratic process.

The comments and recommendations submitted by ESSAE identify specific issues, within the draft regulations, impacting not-for-profit trade associations and make specific recommendations to mitigate these issues. I endorse all the statements and recommendations submitted by ESSAE for the reasons identified above.

Sincerely,

A handwritten signature in black ink that reads "Rick Zimmerman". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Rick Zimmerman, President
Zimmerman and Associates
194 Washington Ave, Suite 610
Albany, NY 12210