

NATIONAL RIFLE ASSOCIATION OF AMERICA  
**INSTITUTE FOR LEGISLATIVE ACTION**

11250 WAPLES MILL ROAD  
FAIRFAX, VIRGINIA 22030



**NRA**

Office of the Executive Director  
**CHRIS W. COX**

May 16, 2007

Dear House Judiciary Committee Member:

The NRA opposes H.R. 2093, the Meehan-Shays proposal that is expected to be offered as an amendment to the House Lobbying Reform bill. Meehan-Shays would define communications mobilizing citizens to contact Congress as "lobbying," subjecting those efforts to onerous registration and reporting requirements for the first time in America's history.

The First Amendment protects the rights of Americans to petition their government. More than a decade ago, when Congress adopted the federal Lobbying Disclosure Act of 1995, Congress was very careful not to infringe on the First Amendment right to petition. Recognizing the dangers of sweeping citizen contacts with Congress into the new system of registration and disclosure, Congress *specifically exempted* grassroots mobilizing from the definition of "lobbying."

Congress got it right in 1995. And there is no need to change that definition today.

The pro-regulation crowd has come up with a new proposal in H.R. 2093 that would subject every direct mail vendor, webmaster, telemarketing firm, media consultant, media buyer, public spokesman for a cause, talk show host, and a myriad of other people and entities who have no direct contact with Congress to be potentially - and unwittingly - swept into this new definition of "lobbyists and lobbying firms."

All that is necessary for any of these people or entities to become "lobbyists" is that they have the temerity to call on citizens to "contact Congress" and that their platform receives or spends \$100,000 in a three month period. Under H.R. 2093, these people or entities would become "lobbyists."

The definition is so vague that it could be literally interpreted to bring within the registration system countless people and entities who have *no* direct contact with Congress — *ever*. But they would nonetheless now be deemed by law to be "lobbyists."

What sense does that make? And, more importantly, what difference does it make?

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In S. 1 (the Senate passed lobbying "reform" bill) and presumably to be enacted in the House version, the complex new reporting requirements for lobbyists and the dramatically tougher criminal penalties for violating the reporting requirements will be daunting even for seasoned lobbyists and lobbying firms. To sweep unsuspecting communications firms and individuals into the definition of "lobbyists," subject to the new criminal penalties, is a frightening prospect.

The NRA urges you to vote against H.R. 2093 and any effort to include grassroots communications in the definition of "lobbying". These communications are protected First Amendment activity, and the rights of the citizens must not be trampled by a small band of regulatory zealots in Washington, D.C.

For us to protect the Second Amendment, we must fight to protect the First Amendment rights of our members to communicate with their elected officials. That's democracy, not "lobbying".

We urge you to vote "NO" on a Meehan-Shays amendment and any other similar effort to regulate or restrict grassroots lobbying.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris W. Cox", with a stylized flourish at the end.

Chris W. Cox