



April 2022

# 2021 LOBBYING DISCLOSURE

## Observations on Lobbyists' Compliance with Disclosure Requirements

Accessible Version

# GAO Highlights

Highlights of [GAO-22-105181](#), a report to congressional committees

## Why GAO Did This Study

The LDA, as amended, requires lobbyists to file quarterly disclosure reports and semiannual reports on certain political contributions. The law also includes a provision for GAO to annually audit lobbyists' compliance with the LDA.

This report, among other things, (1) determines the extent to which lobbyists can demonstrate compliance with disclosure requirements, (2) identifies challenges or potential improvements to compliance that lobbyists report, and (3) describes the efforts of USAO in enforcing LDA compliance. This is GAO's 15th annual report under the provision.

GAO reviewed a stratified random sample of 98 quarterly disclosure LD-2 reports filed for the third and fourth quarters of calendar year 2020 and the first and second quarters of calendar year 2021. GAO also reviewed two random samples totaling 160 LD-203 reports from year-end 2020 and midyear 2021.

This methodology allowed GAO to generalize to the population of 55,084 disclosure reports with \$5,000 or more in lobbying activity and 28,851 reports of federal political campaign contributions. GAO also interviewed USAO officials.

GAO provided a draft of this report to the Department of Justice for review. The Department of Justice did not have comments.

View [GAO-22-105181](#). For more information, contact Yvonne D. Jones at (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov).

April 2022

## 2021 LOBBYING DISCLOSURE

### Observations on Lobbyists' Compliance with Disclosure Requirements

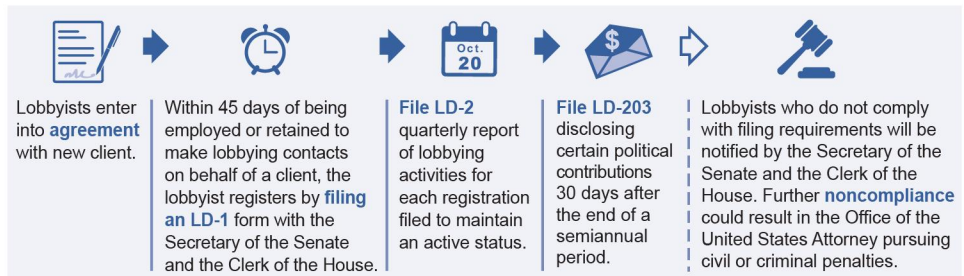
## What GAO Found

For the 2021 reporting period, most lobbyists provided documentation for key elements of their disclosure reports to demonstrate compliance with the Lobbying Disclosure Act of 1995, as amended (LDA). For lobbying disclosure (LD-2) reports and political contribution (LD-203) reports filed during the third and fourth quarters of 2020 and the first and second quarters of 2021, GAO estimates that

- 92 percent of lobbyists who filed new registrations also filed LD-2 reports as required for the quarter in which they first registered (the figure below describes the typical filing process and enforcement);
- 97 percent of all lobbyists who filed provided documentation for lobbying income and expenses;
- 35 percent of all LD-2 reports may not have properly disclosed one or more previously held covered positions as required; and
- 7 percent of LD-203 reports were missing reportable contributions.

These findings are generally consistent with GAO's findings since 2012. Under the Justice Against Corruption on K Street Act of 2018, lobbyists are required to report certain criminal convictions. Of the 245 individual lobbyists in GAO's sample none reported any such convictions. After conducting extensive background and website searches to determine the accuracy of the information reported, GAO could not positively identify one lobbyist due to that person's common name.

#### Typical Lobbying Disclosure Process Typical Lobbying Disclosure Process



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. | GAO-22-105181

#### Accessible Information for Typical Lobbying Disclosure Process Typical Lobbying Disclosure Process

- Lobbyists enter into agreement with new client.
- Within 45 days of being employed or retained to make lobbying contacts on behalf of a client, the lobbyist registers by filing an LD-1 form with the Secretary of the Senate and the Clerk of the House.
- File LD-2 quarterly report of lobbying activities for each registration filed to maintain an active status.
- File LD-203 disclosing certain political contributions 30 days after the end of a semiannual period.

- Lobbyists who do not comply with filing requirements will be notified by the Secretary of the Senate and the Clerk of the House. Further noncompliance could result in the Office of the United States Attorney pursuing civil or criminal penalties.

GAO found that most lobbyists in a sample of 99 reported some level of ease in complying with disclosure requirements and in understanding the definitions of terms used in the reporting. However, some disclosure reports demonstrate compliance difficulties, such as not properly disclosing covered positions or misreporting of income or expenses.

The U.S. Attorney's Office for the District of Columbia (USAO) continued its efforts to resolve noncompliance by having lobbyists file their reports, terminate their registrations, or by pursuing civil and criminal penalties. USAO received 3,473 referrals from both the Secretary of the Senate and the Clerk of the House for failure to comply with reporting requirements cumulatively for years 2012 through 2021. Of the 3,473 referrals, about 28 percent were compliant and about 72 percent were pending further action, as of February 2022. Less than one percent did not require action or were suspended because the lobbyist or client was no longer in business or the individual lobbyist was deceased.

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**Abbreviations**

Clerk of the House	Clerk of the House of Representatives
FEC	Federal Election Commission
HLGOA	Honest Leadership and Open Government Act of 2007

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JACK Act  
LDA  
USAO

Justice Against Corruption on K Street Act of 2018  
Lobbying Disclosure Act of 1995  
U.S. Attorney's Office for the District of Columbia

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April 1, 2022

### Congressional Committees

The Honest Leadership and Open Government Act of 2007 (HLOGA) amended the Lobbying Disclosure Act of 1995 to require lobbyists to file quarterly lobbying disclosure reports and semiannual reports on certain political contributions.<sup>1</sup> HLOGA also increased civil penalties and added criminal penalties for failure to comply with lobbying disclosure requirements. In addition, HLOGA includes a provision for us to annually audit the extent of lobbyists' compliance with the Lobbying Disclosure Act of 1995, as amended (LDA), by reviewing publicly available lobbying registrations and other matters.<sup>2</sup> This is our 15th report under this provision.<sup>3</sup>

As with our prior reports, our objectives were to (1) determine the extent to which lobbyists can demonstrate compliance with the requirements for registrations and reports filed under the LDA; (2) identify any challenges or potential improvements to compliance by lobbyists; and (3) describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) in its role in enforcing LDA compliance and the efforts it has made to improve that enforcement.<sup>4</sup>

To determine the extent to which lobbyists can demonstrate compliance, we examined a stratified random sample of 98 quarterly lobbying disclosure (LD-2) reports with income and expenses of \$5,000 or more filed during the third and fourth quarters of calendar year 2020 and the

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<sup>1</sup>Pub. L. No. 110-81, 121 Stat. 735 (2007), *codified at* 2 U.S.C. §§ 1601-1614. If the lobbyist is employed by a lobbying firm or other organization, the organization (rather than the individual lobbyist) is required to file some of these reports on behalf of the individual lobbyists.

<sup>2</sup>2 U.S.C. § 1614.

<sup>3</sup>A complete list of our prior related reports is included at the end of this report.

<sup>4</sup>For the purposes of this report, we use the term lobbyist to refer to individual lobbyists, lobbying firms (including self-employed individuals who are lobbyists), organizations with in-house lobbyists, or lobbyists' representatives who met with us in the course of our review, unless noted otherwise. We group these terms together for ease of reporting.



first and second quarters of calendar year 2021.<sup>5</sup> We selected the randomly sampled reports from the publicly downloadable database maintained by the Clerk of the House of Representatives (Clerk of the House).<sup>6</sup> This methodology allows us to generalize some elements to the population of LD-2 reports. We then surveyed and interviewed each lobbyist in our sample.<sup>7</sup> Our questionnaire asked lobbyists about their incomes and expenses and accompanying supporting documentation.

In our follow-up interviews, we asked lobbyists to provide written documentation for key elements of their LD-2 reports. This documentation included:

- the amount of income reported for lobbying activities,
- the amount of expenses reported,
- the houses of Congress or federal agencies lobbied,
- lobbying issue areas, and
- the names of individual lobbyists listed in the report.

We reviewed whether individual lobbyists listed on the LD-2 reports properly disclosed (1) prior covered official positions, and (2) certain criminal convictions at the state or federal level as required by the Justice

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<sup>5</sup>Our original sample included 116 randomly selected LD-2 reports 25 reports per quarter and four additional reports for each quarter as alternates. After notification of our review, one lobbyist was non-responsive to requests for participation and we excluded three lobbyists from participation due to hardship experienced by the lobbyists. We selected four alternates from the pool of additional reports and the remaining 12 alternates were not used. Moreover, the LD-2 reports for two lobbyists did not indicate any lobbying activity and were excluded from our analysis of LD-2 reports. Appendix I provides a complete list of lobbyists and clients for sampled lobbying disclosure reports.

<sup>6</sup>Our sample is only one of a large number of samples that we might have drawn. Because each sample could have provided different estimates, we express our confidence in the precision of our estimate as a 95 percent confidence interval. This interval would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise stated, all percentage estimates have a maximum 95 percent confidence interval of within 12 percentage points or less of the estimate. For prior LD-2 reviews, we have drawn stratified random samples of 25 to 27 cases per quarter to attain 80 to 100 completed cases for each review.

<sup>7</sup>Although we contacted each lobbyist, we did not always meet with the individuals identified as the point of contact or with individual lobbyists identified on the forms. In some instances we met with individuals representing the lobbyists in our sample.

Against Corruption on K Street Act of 2018.<sup>8</sup> We also reviewed whether the lobbyists filed the semiannual report of federal political contributions.

One lobbyist in our sample, Potomac Partners DC, did not fill out the survey despite our initial letters sent in July and September 2021 and follow-up contacts through October 2021. We informed the firm that because it declined to complete the survey, we would report its name to Congress, as provided for in HLOGA.<sup>9</sup> Appendix I contains a list of lobbyists whose LD-2 reports were randomly selected for our review.

To determine whether lobbyists reported their federal political contributions as required by the LDA, we analyzed stratified random samples of year-end 2020 and midyear 2021 semiannual political contributions (LD-203) reports. The samples contain 80 LD-203 reports that list contributions and 80 LD-203 reports that do not. We selected the randomly sampled reports from the publicly downloadable contributions database maintained by the Clerk of the House (see appendix II for a list of lobbyists randomly selected for our review of LD-203 reports).

We then checked the contributions reported in the Federal Election Commission's (FEC) database against the contributions identified in our sample.<sup>10</sup> This helped us determine whether all contributions reported in the FEC database were also reported on the LD-203s as required. We contacted lobbyists and asked them to provide documentation to clarify differences we observed. This methodology allows us to generalize to the population of LD-203 reports both with and without contributions.

To determine whether lobbyists were meeting the requirement to file an LD-2 report for the quarter in which they registered, we compared new registrations (LD-1) filed in the third and fourth quarters of 2020 and the

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<sup>8</sup>Pub. L. No. 115-418, 132 Stat. 5440 (2019), *codified at* 2 U.S.C. §§ 1603(b) (7), 1604(b) (6). The act is also known as the JACK Act.

<sup>9</sup>2 U.S.C. § 1614(c).

<sup>10</sup>FEC is the independent regulatory agency charged with administering and enforcing federal campaign finance law. According to FEC's website, federal campaign finance law covers three broad subjects: (1) public disclosure of funds raised and spent to influence federal elections; (2) restrictions on contributions and expenditures made to influence federal elections; and (3) the public financing of presidential campaigns. See <https://www.fec.gov/about/mission-and-history/>. FEC has jurisdiction over the financing of campaigns for the U.S. House, Senate, presidency and the vice presidency.

first and second quarters of 2021 to the corresponding LD-2 reports on file with the Clerk of the House.

To assess the reliability of the data used, we reviewed available documentation and interviewed knowledgeable officials about the process of collecting, entering, and storing data and about mechanisms to ensure validity, reliability, and consistency of data. We found the data to be sufficiently reliable for our purposes.

To identify any challenges or potential improvements to compliance, we used a structured web-based survey to obtain views from lobbyists included in our sample of reports. In general, we asked lobbyists whether it was easy or difficult to comply with the LD-2 disclosure requirements. Specifically, we asked in our survey whether they understood lobbying terms such as lobbying activities, terminating lobbyists, lobbying issue area codes, and covered positions.

To describe the resources and authorities available to USAO and its efforts to improve LDA enforcement, we interviewed USAO officials and obtained information about their system's capabilities to track enforcement and compliance trends and referral data that it receives from the Secretary of the Senate and the Clerk of the House.<sup>11</sup> A more detailed description of our methodology is provided in appendix III.

The mandate does not require us to identify lobbyists that failed to register and report in accordance with LDA requirements. The mandate also does not require us to determine whether reported lobbying activity or political contributions represented the full extent of lobbying activities that took place.

We conducted this performance audit from April 2021 to April 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>11</sup>When a lobbyist fails to provide a timely, appropriate response to the Secretary of the Senate's or the Clerk of the House's written notice that the individual or firm may be in noncompliance with the LDA, the Secretary of the Senate and the Clerk of the House are required to notify USAO that the lobbyist may be in noncompliance. 2 U.S.C. § 1605(a)(8).

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## Background

The LDA defines a lobbyist as an individual who is employed or retained by a client for compensation for services that include more than one lobbying contact (certain written or oral communication to covered officials, such as a high-ranking agency official or a member of Congress, made on behalf of a client),<sup>12</sup> and whose lobbying activities represent at least 20 percent of the time that he or she spends on behalf of the client during the quarter.<sup>13</sup> Lobbying firms are persons or entities that have one or more employees who are lobbyists on behalf of a client other than that person or entity.<sup>14</sup> However, for the purposes of our report, we use the term lobbyist to refer to individual lobbyists, lobbying firms, or organizations with in-house lobbyists, unless noted otherwise.<sup>15</sup>

The LDA requires lobbyists to register new clients with the Secretary of the Senate and the Clerk of the House and to file quarterly reports disclosing the lobbyists' respective lobbying activities.<sup>16</sup> Lobbyists are

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<sup>12</sup>The LDA defines a covered executive branch official as the President, Vice President, an officer or employee, or any other individual functioning in the capacity of such an officer or employee in the Executive Office of the President; an officer or employee serving in levels I through V of the Executive Schedule; members of the uniformed services whose pay grade is at or above O-7; and any officer or employee serving in a position of a confidential, policy-determining, policy-making or policy-advocating character who is excepted from competitive service as determined by the Office of Personnel Management (commonly called Schedule C employees). 2 U.S.C. § 1602(3). The LDA defines a covered legislative branch official as a member of Congress; an elected officer of either house of Congress; any employee or any other individual functioning in the capacity of an employee of a member of Congress, a committee of either house of Congress, the leadership staff of either house of Congress, a joint committee of Congress, or a working group or caucus organized to provide legislative services or other assistance to members; or any other legislative branch employee serving in a position described under section 109(13) of the Ethics in Government Act of 1978. 2 U.S.C. § 1602(4). Lobbying activities include not only direct lobbying contacts but also efforts in support of such contacts, such as preparation and planning activities, research, and other background work that is intended for use in contacts. 2 U.S.C. §1602(7).

<sup>13</sup>2 U.S.C. § 1602(10).

<sup>14</sup>2 U.S.C. § 1602(9). A self-employed individual who is a lobbyist is also included in the LDA definition of a lobbying firm.

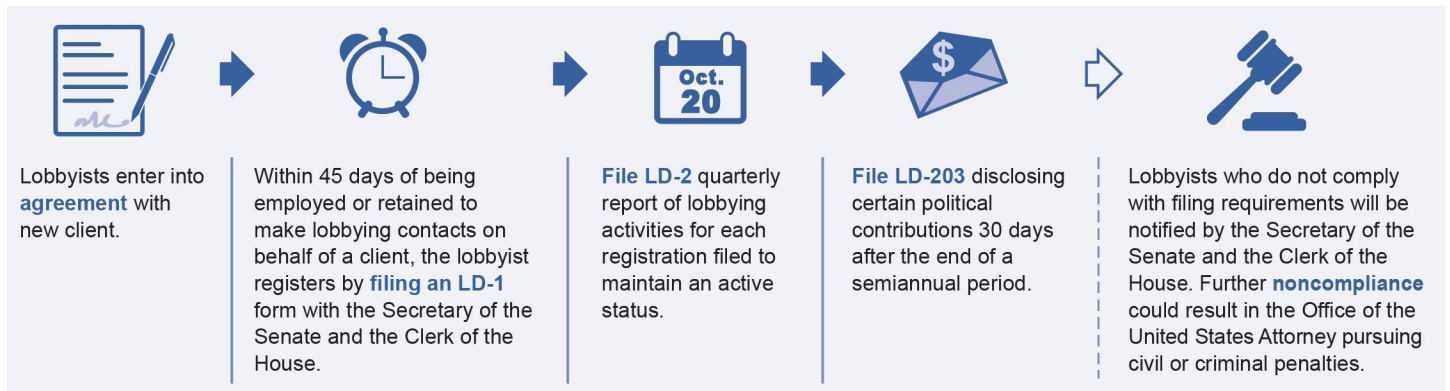
<sup>15</sup>In addition, we refer to the individuals who represented lobbyists and who met with us during the course of our review as lobbyists.

<sup>16</sup>If an organization has one or more employees who are lobbyists, the organization is required to file a single registration for each client for whom the employees act as lobbyists. 2 U.S.C. § 1603 (a)(2).

required to file their registrations and reports electronically with the Secretary of the Senate and the Clerk of the House through a single entry point. Registrations and reports must, to the extent practicable, be publicly available in downloadable, searchable databases from the Secretary of the Senate and the Clerk of the House.

No specific statutory requirements exist for lobbyists to generate or maintain documentation in support of the information disclosed in the reports they file. However, guidance issued by the Secretary of the Senate and the Clerk of the House recommends that lobbyists retain copies of their filings and documentation supporting reported income and expenses for at least 6 years after they file their reports. Figure 1 provides an overview of the registration and filing process.

**Figure 1: Typical Lobbying Disclosure Process**



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. | GAO-22-105181

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**Accessible Information for Figure 1: Typical Lobbying Disclosure Process**

- Lobbyists enter into agreement with new client.
- Within 45 days of being employed or retained to make lobbying contacts on behalf of a client, the lobbyist registers by filing an LD-1 form with the Secretary of the Senate and the Clerk of the House.
- File LD-2 quarterly report of lobbying activities for each registration filed to maintain an active status.
- File LD-203 disclosing certain political contributions 30 days after the end of a semiannual period.
- Lobbyists who do not comply with filing requirements will be notified by the Secretary of the Senate and the Clerk of the House. Further noncompliance could result in the Office of the United States Attorney pursuing civil or criminal penalties.

Lobbyists are required to register with the Secretary of the Senate and the Clerk of the House for each client if the lobbyists generally receive or expect to receive more than \$3,000 in income in a quarterly period from that client for lobbying activities.<sup>17</sup> When registering, lobbyists must identify any affiliated organizations that contribute more than \$5,000 for lobbying in a quarterly period and actively participate in the planning, supervision, or control of the lobbying activities.<sup>18</sup>

Lobbyists are also required to submit an LD-2 quarterly report for each registration filed. The LD-2s contain information that includes

- the name of the lobbyist reporting on quarterly lobbying activities;
- the name of the client for whom the lobbyist lobbied;
- a list of individuals who acted as lobbyists on behalf of the client during the reporting period;
- whether any individual lobbyists listed served in covered positions in the executive or legislative branch, such as high-ranking agency officials or congressional staff positions, in the previous 20 years;

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<sup>17</sup>If an individual lobbyist is employed by a lobbying firm, the firm (rather than the individual lobbyist) is required to file the registration on behalf of the employees who are lobbyists for the client. The \$3,000 threshold applies to total income related to lobbying activities on behalf of a client. Organizations employing in-house lobbyists file only one registration. An organization employing in-house lobbyists is exempt from filing if total expenses in connection with lobbying activities are not expected to exceed \$14,000 during a quarterly period. Amounts are adjusted for inflation and published in LDA guidance.

<sup>18</sup>2 U.S.C. § 1603(b)(3). The term “affiliate organization” is not found in the statute, but rather defined in the LDA guidance. See [https://lobbyingdisclosure.house.gov/amended\\_lda\\_guide.html](https://lobbyingdisclosure.house.gov/amended_lda_guide.html).

- codes describing general lobbying issue areas, such as agriculture and education;
- a description of the specific lobbying issues;
- houses of Congress and federal agencies lobbied during the reporting period; and
- reported income (or expenses for organizations with in-house lobbyists) related to lobbying activities during the quarter (rounded to the nearest \$10,000).

The LDA also requires lobbyists to report certain political contributions semiannually in the LD-203 report. These reports must be filed 30 days after the end of a semiannual period by each lobbyist that has filed a registration and by each individual lobbyist listed on an LD-2 report. The lobbyists must

- list the name of each federal candidate or officeholder, leadership political action committee, or political party committee to which they contributed at least \$200 in the aggregate during the semiannual period;
- report contributions made to presidential library foundations and presidential inaugural committees;
- report funds contributed to pay the cost of an event to honor or recognize an official who was previously in a covered position, funds paid to an entity named for or controlled by a covered official, and contributions to a person or entity in recognition of an official, or to pay the costs of a meeting or other event held by or in the name of a covered official; and
- certify that they have read and are familiar with the gift and travel rules of the Senate and House and that they have not provided, requested, or directed a gift or travel to a member, officer, or employee of Congress who would violate those rules.

In January 2019, the Justice Against Corruption on K Street Act of 2018 (JACK Act) was enacted.<sup>19</sup> The JACK Act amends the Lobbying Disclosure Act of 1995. It requires that lobbyists disclose in their lobbying registrations and quarterly lobbying disclosure reports whether individual lobbyists have been convicted of certain criminal acts at the state or federal level. Specifically, the act requires that, for any listed individual lobbyist who has been convicted of an offense involving bribery, extortion,

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<sup>19</sup>Pub. L. No. 115-418.

embezzlement, an illegal kickback, tax evasion, fraud, a conflict of interest, making a false statement, perjury, or money laundering, the lobbyist is to provide the date of conviction and a description of the offense in the lobbying registration and subsequent quarterly reports.

The LDA requires that the Secretary of the Senate and the Clerk of the House guide and assist lobbyists with the registration and reporting requirements and develop common standards, rules, and procedures for LDA compliance. The Secretary of the Senate and the Clerk of the House review the guidance periodically.<sup>20</sup> It was last revised on February 28, 2021, to, among other things, update registration thresholds reflecting changes in the Consumer Price Index, add a section on the JACK Act, and provide new sections regarding listing lobbyists and listing affiliates.

The guidance defines LDA terms, elaborates on registration and reporting requirements, includes specific examples of different disclosure scenarios, and explains why certain scenarios prompt or do not prompt disclosure under the LDA. Previously, the offices of the Secretary of the Senate and the Clerk of the House told us they continue to consider information we report on lobbying disclosure compliance when they periodically update the guidance. In addition, in previous years, they told us they email registered lobbyists quarterly about common compliance issues and to provide reminders to file reports by the due dates.

The Secretary of the Senate and the Clerk of the House, along with USAO, are responsible for ensuring LDA compliance. The Secretary of the Senate and the Clerk of the House notify lobbyists in writing when they are not complying with the LDA reporting requirements. Subsequently, they refer those lobbyists who fail to provide a timely, appropriate response to USAO. USAO researches these referrals and sends additional noncompliance notices to the lobbyists requesting that they file reports or terminate their registration. If USAO does not receive a response after 60 days, it decides whether to pursue a civil or criminal case against each noncompliant lobbyist. A civil case could lead to penalties up to \$200,000 for each violation, while a criminal conviction could lead to a maximum of 5 years in prison.

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<sup>20</sup>Lobbying Disclosure Act Guidance, see [https://lobbyingdisclosure.house.gov/amended\\_lda\\_guide.html](https://lobbyingdisclosure.house.gov/amended_lda_guide.html).



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## Lobbyists Filed Disclosure Reports as Required for Most New Lobbying Registrations

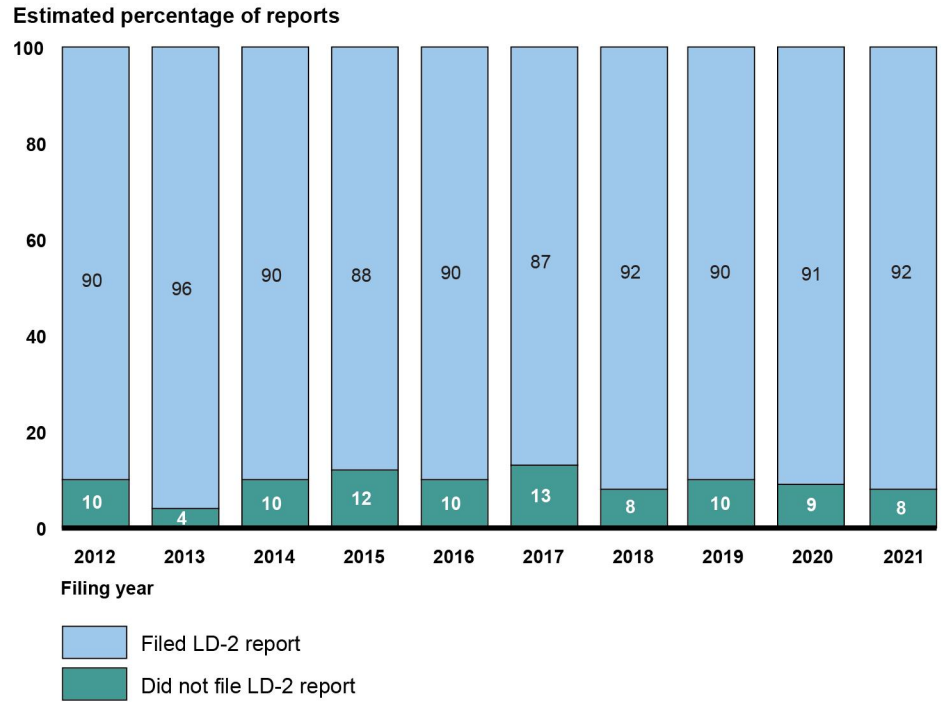
Under the LDA, within 45 days of being employed or retained to make a lobbying contact on behalf of a client, the lobbyist must register by filing an LD-1 form with the Secretary of the Senate and the Clerk of the House.<sup>21</sup> Thereafter, the lobbyist must file quarterly LD-2 reports detailing the lobbying activities. Of the 4,588 new registrations we identified for the third and fourth quarters of 2020 and the first and second quarters of 2021, we matched 4,220 of them (92 percent) to corresponding LD-2 reports filed within the same quarter as the registration.

These results are consistent with the findings we have reported in prior reviews. We used the House lobbyists' disclosure database as the source of the reports. We also used an electronic matching algorithm that addresses misspellings and other minor inconsistencies between the registrations and reports. Figure 2 shows lobbyists filed disclosure reports as required for most new lobbying registrations from 2012 through 2021.

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<sup>21</sup>Where an organization uses its own employees to lobby on behalf of the organization, the requirement to register is triggered once an employee makes a second lobbying contact (thereby satisfying the definition of a "lobbyist" at 2 U.S.C. § 1602(10)). Registration is required within 45 days of the second contact. 2 U.S.C. § 1603(a)(1).

**Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure (LD-2) Reports, 2012 through 2021**



Source: GAO analysis of lobbying disclosure (LD-2) reports data. | GAO-22-105181

**Accessible Data for Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure (LD-2) Reports, 2012 through 2021**

Filing year	Did Not File LD-2 report (percentage)	Filed LD-2 report (percentage)
2012	10	90
2013	4	96
2014	10	90
2015	12	88
2016	10	90
2017	13	87
2018	8	92
2019	10	90
2020	9	91
2021	8	92

As part of their regular enforcement procedures, the Clerk of the House and Secretary of the Senate are to follow up with newly filed registrations if quarterly reports were not filed. If the Clerk of the House and the Secretary of the Senate are unsuccessful in bringing the lobbyist into compliance, they must refer those cases to USAO.

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### For Most LD-2 Reports, Lobbyists Provided Documentation for Key Elements, Including Documentation for Their Income and Expenses

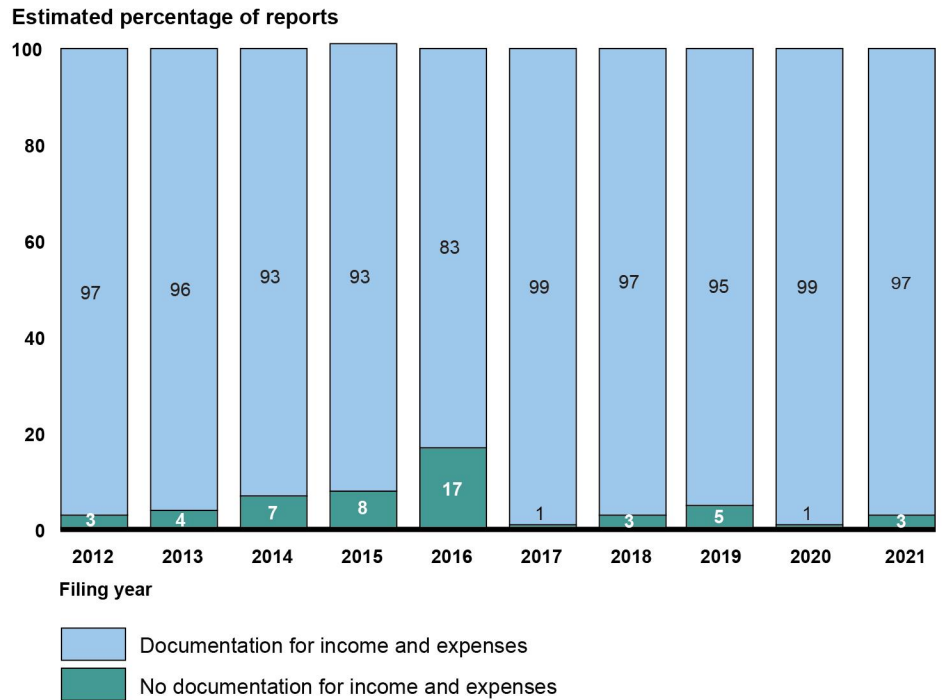
For selected elements of lobbyists' LD-2 reports that can be generalized to the population of lobbying reports, our findings have generally been consistent from year to year.<sup>22</sup> Most lobbyists reporting \$5,000 or more in income or expenses provided written documentation to varying degrees for the reporting elements in their disclosure reports. Figure 3 shows that for most LD-2 reports, lobbyists provided documentation for income and

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<sup>22</sup>To assess the statistical significance of change over time, we used statistical tests that adjusted for multiple comparisons across the 10 years included in our analysis. The percentage estimates of the LD-2 analysis have a maximum 95 percent confidence interval of within 12 percentage points or fewer.

expenses for sampled reports from 2012 through 2021. Our 2021 estimate does not represent a statistically significant change from 2020.<sup>23</sup>

**Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses, 2012 through 2021**



Source: GAO analysis of lobbying disclosure (LD-2) reports data. | GAO-22-105181

<sup>23</sup>However, in recent years, our findings showed some variation in the estimated percentage of lobbyists who have reports with documentation for income and expenses supporting lobbying activities. Specifically, our estimate for 2017 (99 percent) represented a statistically significant increase from 2016 (83 percent). While the results provide some confidence that apparent fluctuations in our results across years are likely attributable to sampling error, the inability to detect significant differences may also be related to the nature of our sample, which was relatively small and designed only for cross-sectional analysis.

**Accessible Data for Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses, 2012 through 2021**

Filing year	No documentation for income and expenses (percentage)	Documentation for income and expenses (percentage)
2012	3	97
2013	4	96
2014	7	93
2015	8	93
2016	17	83
2017	1	99
2018	3	97
2019	5	95
2020	1	99
2021	3	97

Note: Estimated percentages have a margin of error of 10 percentage points or fewer. In 2015 percentages do not total 100 due to rounding.

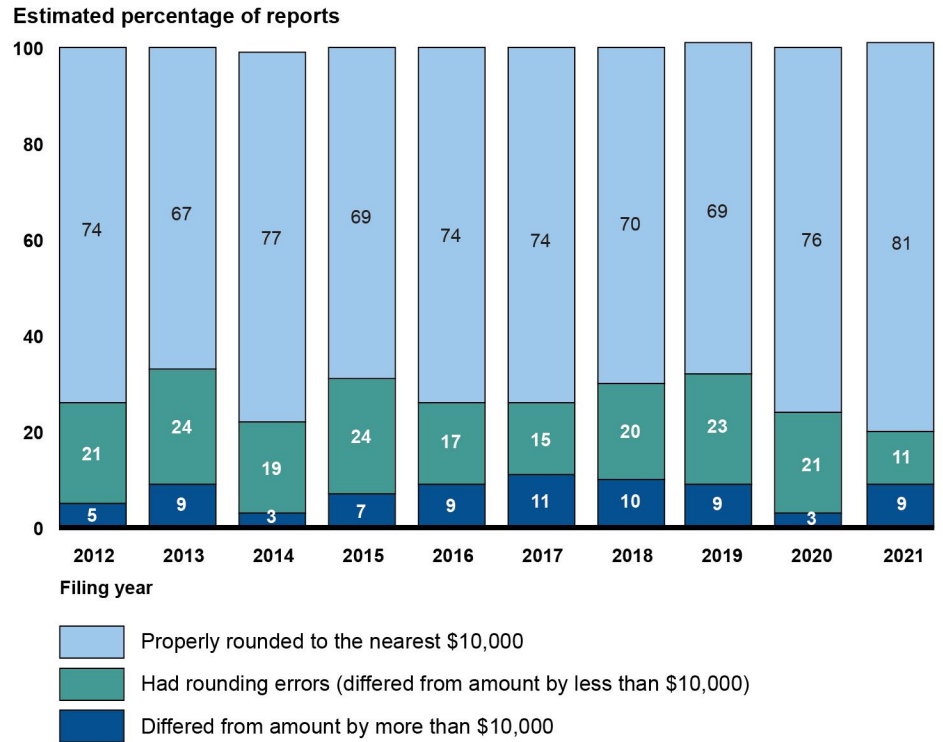
Figure 4 shows that in 2021, 9 percent of lobbyists' reported income or expenses recorded on their LD-2s differed from the amounts submitted to us on their supporting documentation by more than \$10,000. This is a 6 percentage point increase from 2020. Additionally, for some LD-2 reports, lobbyists did not round their income or expenses as the law requires.<sup>24</sup> For 2021, we estimated that 11 percent of reports had rounding errors in amounts less than \$10,000 on reported income or expenses. We have found that rounding difficulties have been a recurring issue on LD-2 reports from 2012 through 2021.<sup>25</sup> In 2016, the guidance was updated to include an additional example about rounding expenses to the nearest \$10,000.

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<sup>24</sup>Lobbyists reporting income or expenses are required to provide an estimate of the actual dollar amount rounded to the nearest \$10,000 for those amounts that exceed \$5,000. 2 U.S.C. § 1604(c)(1). In the event income or expenses do not exceed \$5,000, the firm is to include a statement that income or expenses totaled less than \$5,000 for the reporting period. 2 U.S.C. § 1604(c)(2).

<sup>25</sup>Our estimate of the number of reports with rounding errors includes reports that disclosed the exact amount of income from or expenditures on lobbying activities but failed to round to the nearest \$10,000 as required.

**Figure 4: Estimated Percentage of Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses, 2012 through 2021**



Source: GAO analysis of lobbying disclosure (LD-2) reports data. | GAO-22-105181

**Accessible Data for Figure 4: Estimated Percentage of Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses, 2012 through 2021**

Filing year	Differed from amount by more than \$10,000 (percentage)	Had rounding errors (differed from amount by less than \$10,000) (percentage)	Properly rounded to the nearest \$10,000 (percentage)
2012	5	21	74
2013	9	24	67
2014	3	19	77
2015	7	24	69
2016	9	17	74
2017	11	15	74
2018	10	20	70
2019	9	23	69
2020	3	21	76
2021	9	11	81

Note: Estimated percentages have a margin of error of 12 percentage points or fewer. In 2014, 2019, and 2021 percentages do not total 100 due to rounding.

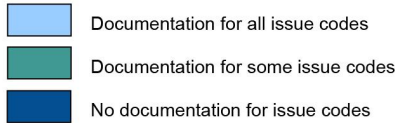
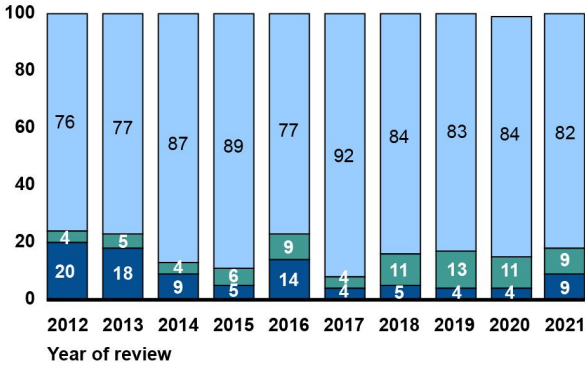
The LDA requires lobbyists to disclose lobbying contacts made with federal agencies on behalf of the client for the reporting period. This year, of the 98 LD-2 reports in our sample, 52 percent disclosed lobbying activities at federal agencies. Of those, lobbyists provided documentation for all disclosed lobbying activities at executive branch agencies for 51 percent of LD-2 reports and documentation for some lobbying activities at federal agencies for 15 percent of LD-2 reports.

Figure 5 shows that, for most LD-2 reports, lobbyists provided documentation for selected elements of their LD-2 reports that include general issue area codes for lobbying activities, lobbying the House and the Senate, and individual lobbyists listed from 2012 through 2021. In 2021, documentation for lobbying the Senate had statistically significant decreases relative to 2017, 2018, and 2019. Similarly, in 2021, documentation for lobbying the House had statistically significant decreases relative to 2017 and 2019.

**Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2012 through 2021**

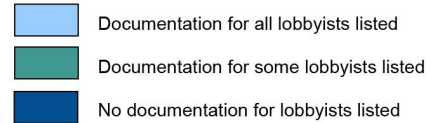
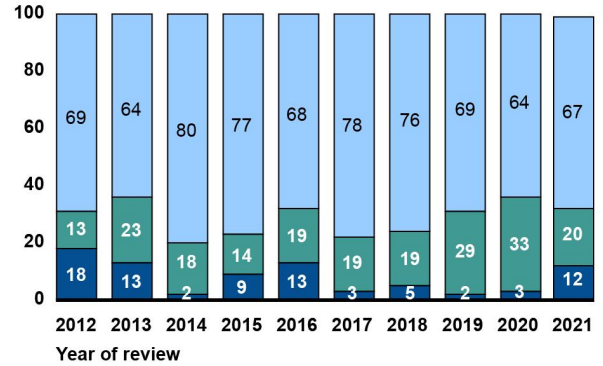
**General Issue Areas**

Estimated percentage of reports



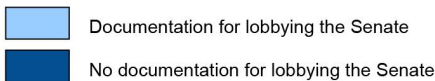
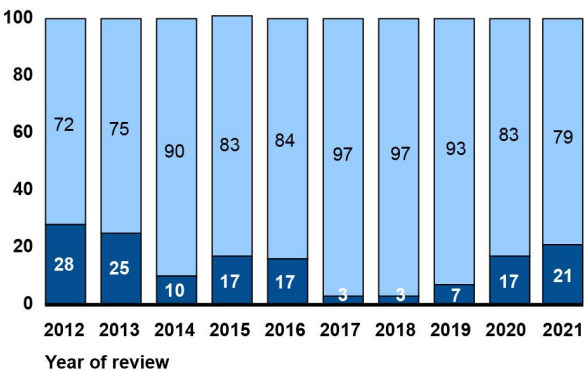
**Individual Lobbyists Listed**

Estimated percentage of reports



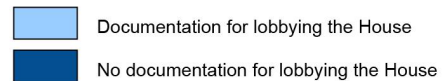
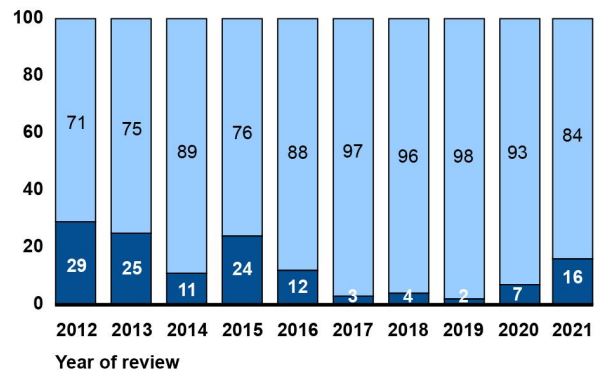
**Lobbying the United States Senate**

Estimated percentage of reports



**Lobbying the House of Representatives**

Estimated percentage of reports



Source: GAO analysis of survey results. | GAO-22-105181



**Accessible Data for Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2012 through 2021**

**General Issue Areas**

Year of review	No Documentation for Issue Codes (percentage)	Documentation for Some Issue Codes (percentage)	Documentation for All Issue Codes (percentage)
2012	20	4	76
2013	18	5	77
2014	9	4	87
2015	5	6	89
2016	14	9	77
2017	4	4	92
2018	5	11	84
2019	4	13	83
2020	4	11	84
2021	9	9	82

**Individual Lobbyists Listed**

Year of review	No Documentation for Issue Codes (percentage)	Documentation for Some Issue Codes (percentage)	Documentation for All Issue Codes (percentage)
2012	18	13	69
2013	13	23	64
2014	2	18	80
2015	9	14	77
2016	13	19	68
2017	3	19	78
2018	5	19	76
2019	2	29	69
2020	3	33	64
2021	12	20	67

**Lobbying the United States Senate**

Year of review	No Documentation for lobbying the Senate (percentage)	Documentation for lobbying the Senate (percentage)
2012	28	72
2013	25	75
2014	10	90
2015	17	84
2016	16	84
2017	3	97
2018	3	97
2019	7	93
2020	17	83
2021	21	79

**Lobbying the House of Representatives**

Year of review	No Documentation for lobbying the Senate (percentage)	Documentation for lobbying the Senate (percentage)
2012	29	71
2013	25	75
2014	11	89
2015	24	76
2016	12	88
2017	3	97
2018	4	96
2019	2	98
2020	7	93
2021	16	84

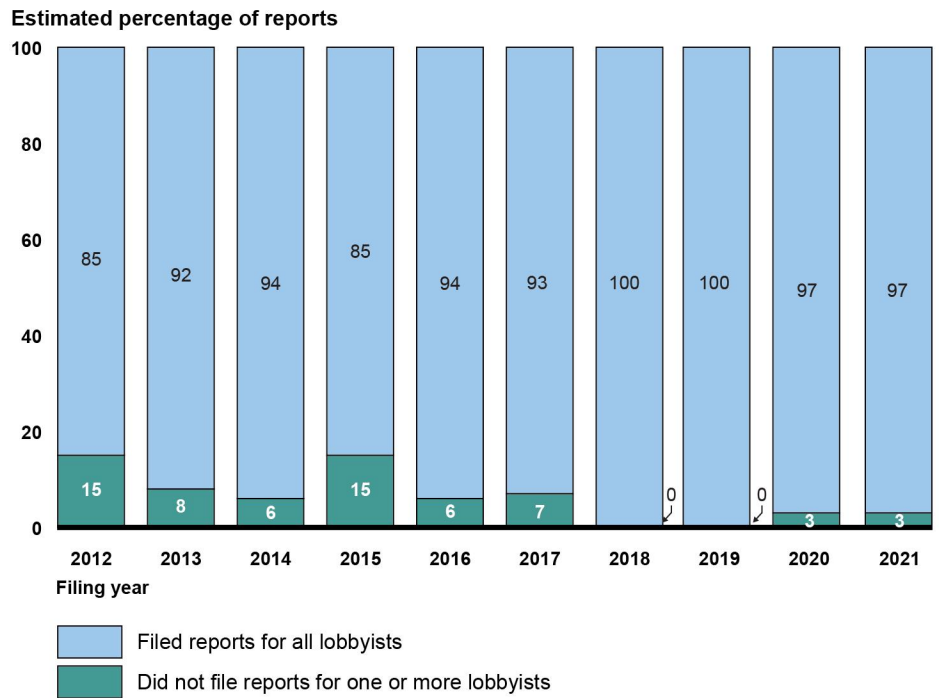
Note: Estimated percentages have a margin of error of 12 percentage points or fewer. For general issue areas in 2020, individual lobbyists in 2021, and Lobbying in US Senate 2016, percentages do not total 100 due to rounding.

**For Most Lobbying Disclosure Reports (LD-2), Lobbyists Filed Political Contribution Reports (LD-203) for All Listed Lobbyists**

Figure 6 shows that most lobbyists filed contribution reports as required in our sample from 2012 through 2021. Individual lobbyists reporting lobbying activity are required to file LD-203 reports semiannually, even if

they have no contributions to report, because they must certify compliance with the gift and travel rules. All lobbyists included in our 2019 sample and almost all lobbyists in our 2020 and 2021 samples filed political contribution reports.

**Figure 6: Extent to Which Lobbyists on Lobbying Disclosure (LD-2) Reports Filed Contribution Reports for All Listed Lobbyists, 2012 through 2021**



Source: GAO analysis of Federal Election Commission data. | GAO-22-105181

**Accessible Data for Figure 6: Extent to Which Lobbyists on Lobbying Disclosure (LD-2) Reports Filed Contribution Reports for All Listed Lobbyists, 2012 through 2021**

Filing year	Did not file reports for one or more lobbyists (percentage)	Filed reports for all lobbyists (percentage)
2012	15	85
2013	8	92
2014	6	94
2015	15	85
2016	6	94
2017	7	93
2018	0	100
2019	0	100
2020	3	97
2021	3	97

Note: Estimated percentages have a margin of error of 12 percentage points or fewer.

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## Lobbyists May Not Have Properly Disclosed Their Previously Held Covered Positions

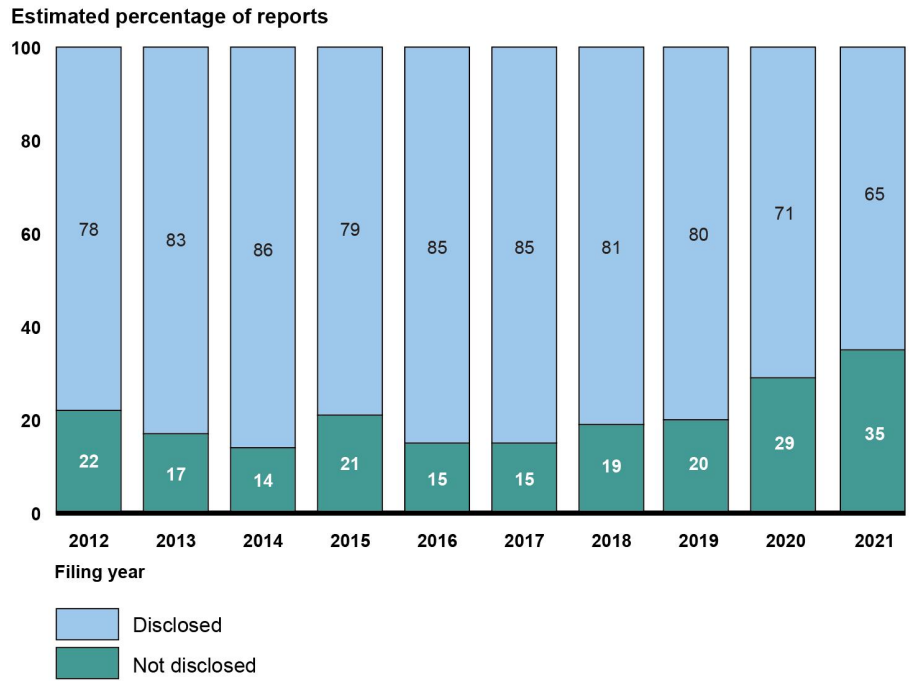
The LDA requires a lobbyist to disclose previously held covered positions in the executive or legislative branch, such as high-ranking agency officials and congressional staff. This can be done either on a new LD-1, where lobbyists list the employees who are expected to act as a lobbyist on behalf of the client, or on the quarterly LD-2 filing when adding a new individual lobbyist. For 2021, we estimated that 35 percent of all lobbyists may not have properly disclosed previously held covered positions as required.<sup>26</sup> This is a statistically significant increase in the percentage of lobbyists not properly disclosing covered positions compared to years 2013, 2014, 2016, and 2017. As in our other reports, some lobbyists stated they were still unclear about the need to disclose certain covered positions, such as paid congressional internships or certain executive agency positions. Figure 7 shows the extent to which lobbyists may not

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<sup>26</sup>Prior to each interview, we reviewed the lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Legistorm, and Google to determine whether lobbyists properly disclosed their covered positions as required by the LDA.

have properly disclosed one or more covered positions as required from 2012 through 2021.

**Figure 7: Estimated Percentage of Lobbying Disclosure (LD-2) Reports Where Lobbyists May Not Have Properly Disclosed One or More Covered Positions, 2012 through 2021**



Source: GAO analysis of lobbying disclosure (LD-2) reports data. | GAO-22-105181

**Accessible Data for Figure 7: Estimated Percentage of Lobbying Disclosure (LD-2) Reports Where Lobbyists May Not Have Properly Disclosed One or More Covered Positions, 2012 through 2021**

Filing year	Not Disclosed (percentage)	Disclosed (percentage)
2012	22	78
2013	17	83
2014	14	86
2015	21	79
2016	15	85
2017	15	85
2018	19	81
2019	20	80
2020	29	71
2021	35	65

Note: Estimated percentages have a margin of error of 12 percentage points or fewer. Lobbying disclosure requires reporting on two types of positions: covered executive branch and legislative branch positions. The term covered executive branch position refers to an officer or an employee serving in: (1) a position of the Executive Schedule or (2) a position of a confidential, policy-determining, policy-making, or policy-advocating character, among others. The term covered legislative branch position refers to: (1) a member of Congress; (2) an elected officer of either house of Congress; and (3) any employee of a member of Congress, a committee, or the leadership staff of either house of Congress, among others.

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### Lobbyists Reported No Criminal Convictions on LD-2 Reports for This Year’s Review

Lobbyists were required to begin disclosing relevant convictions in their first quarter 2019 LD-2 reports. None of the lobbyists in our sample of LD-2 reports for the third and fourth quarters of 2020 and the first and second quarters of 2021—which together consisted of 245 individual lobbyists—disclosed any convictions in the reports. While we found information relevant to the JACK Act for one lobbyist, we could not locate any relevant court records. In addition, after conducting extensive background and website searches to determine the accuracy of the information reported, we could not positively identify one lobbyist due to that person’s common name.<sup>27</sup>

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<sup>27</sup>For more information, see appendix III.

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## Some Lobbyists Amended Their Disclosure Reports after We Contacted Them

Of the 98 LD-2 reports in our original sample, lobbyists amended 33 of the reports to change previously reported information after we contacted them. Of the 33 reports, six were amended after we notified the lobbyists of our review but before we met with them. An additional 27 of the 33 reports were amended after we met with the lobbyists to review their documentation.

We consistently find a notable number of amended LD-2 reports in our sample each year following notification of our review. This suggests that our contact may spur some lobbyists to more closely scrutinize their reports than they would have without our review. Table 1 lists reasons lobbyists in our sample amended their LD-2 reports.

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**Table 1: Reasons Lobbyists in Our Sample Amended Their Disclosure Reports from July 2020 to July 2021**

Category	Number of times reason was selected
Updated covered position	18
Updated income or expenses	6
Changed House, Senate, or executive branch agency lobbying activity	5
Changed individual lobbyists	4
Changed specific lobbying issue	4
Attributed changes to general issues	2
No lobbying activity	1
Other	1

Source: GAO analysis of amended LD-2 reports. | GAO-22-105181

Note: Lobbyists amended 33 of the 98 LD-2 reports in our sample. Some were amended for more than one reason.

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## Most LD-203 Contribution Reports Disclosed Political Contributions Listed in the Federal Election Commission Database

As part of our review, we compared contributions listed on lobbyists' LD-203 reports against those political contributions reported in the Federal Election Commission (FEC) database to identify whether political contributions were omitted on LD-203 reports in our sample. The sample

of LD-203 reports we reviewed contained 80 reports with contributions and 80 reports without contributions. We estimated that overall for 2021 lobbyists failed to disclose one or more reportable contributions on 7 percent of reports.<sup>28</sup> Additionally, eight LD-203 reports were amended in response to our review. Table 2 shows our results from 2012 to 2021; estimates in the table have a maximum margin of error of 10 percentage points.

**Table 2: Numbers and Percentages of Lobbying Disclosure (LD-203) Reports That Omitted One or More Political Contributions, 2012-2021**

Year of review	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Number of reports with contributions that had one or more omissions	14	10 <sup>a</sup>	8	11	9	11	9	6	13	8
Number of reports without contributions that had one or more omissions	4	0	1	0	1	2	0	0	0	3
Estimated percentage of all reports with one or more omissions	9	4	4	4	5	6	4	2	8	7

Source: GAO analysis of LD-203 reports. | GAO-22-105181

<sup>a</sup>In 2013, N=79. For all other years, N=80.

## Most Lobbyists Reported Some Level of Ease in Complying with Disclosure Requirements and Understood Lobbying Terms

Most lobbyists reported that they found it “very easy” or “somewhat easy” to comply with reporting requirements. Of the 99 different lobbyists in our sample, 39 reported that the disclosure requirements were “very easy,” 54 reported they were “somewhat easy,” and six reported they were “somewhat difficult” or “very difficult.”<sup>29</sup> (see figure 8).

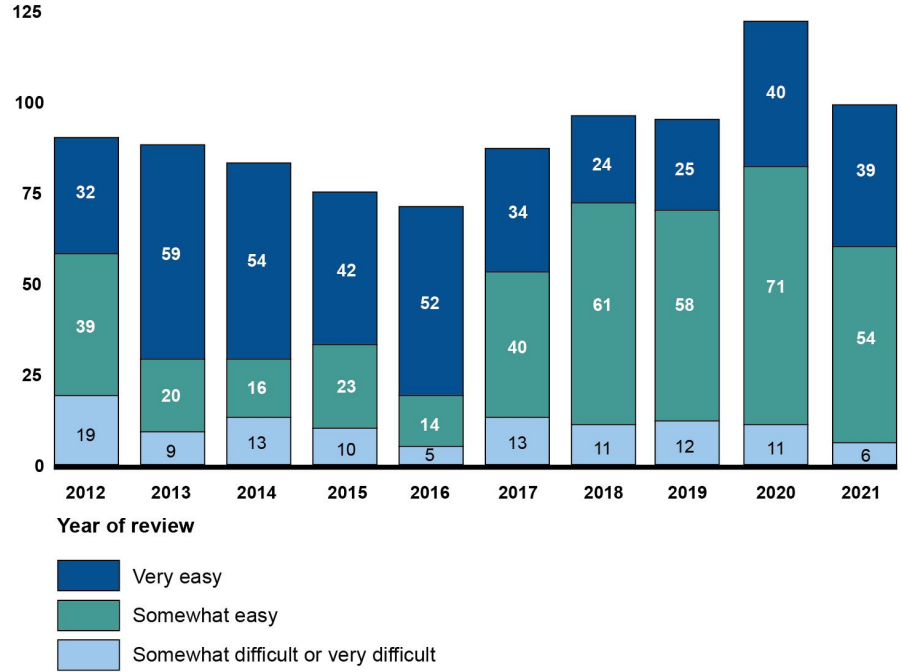
<sup>28</sup>We did not estimate the percentage of other non-FEC political contributions that were omitted because they tend to constitute a small minority of all listed contributions and cannot be verified against an external data source.

<sup>29</sup>Our survey was sent to 116 lobbyists, but the number of different lobbyists responding to the survey was 99. We removed one lobbyist for non-responsiveness to requests for participation, three lobbyists due to hardship, and 13 duplicate lobbyists. There are duplicate lobbyists because some lobbyists had more than one LD-2 report included in our sample.



**Figure 8: Ease of Complying with Lobbying Disclosure Requirements, 2012 through 2021**

Number of reports



Source: GAO analysis of survey results. | GAO-22-105181

**Accessible Data for Figure 8: Ease of Complying with Lobbying Disclosure Requirements, 2012 through 2021**

Filing year	Number of Difficult reports	Number of Somewhat easy reports	Number of Easy Reports
2012	19	39	32
2013	9	20	59
2014	13	16	54
2015	10	23	42
2016	5	14	52
2017	13	40	34
2018	11	61	24
2019	12	58	25
2020	11	71	40
2021	6	54	39

Note: The number of possible responses varies because of changes in sample size over time. Smaller sample sizes in prior years have limited our ability to identify changes in the percentage of

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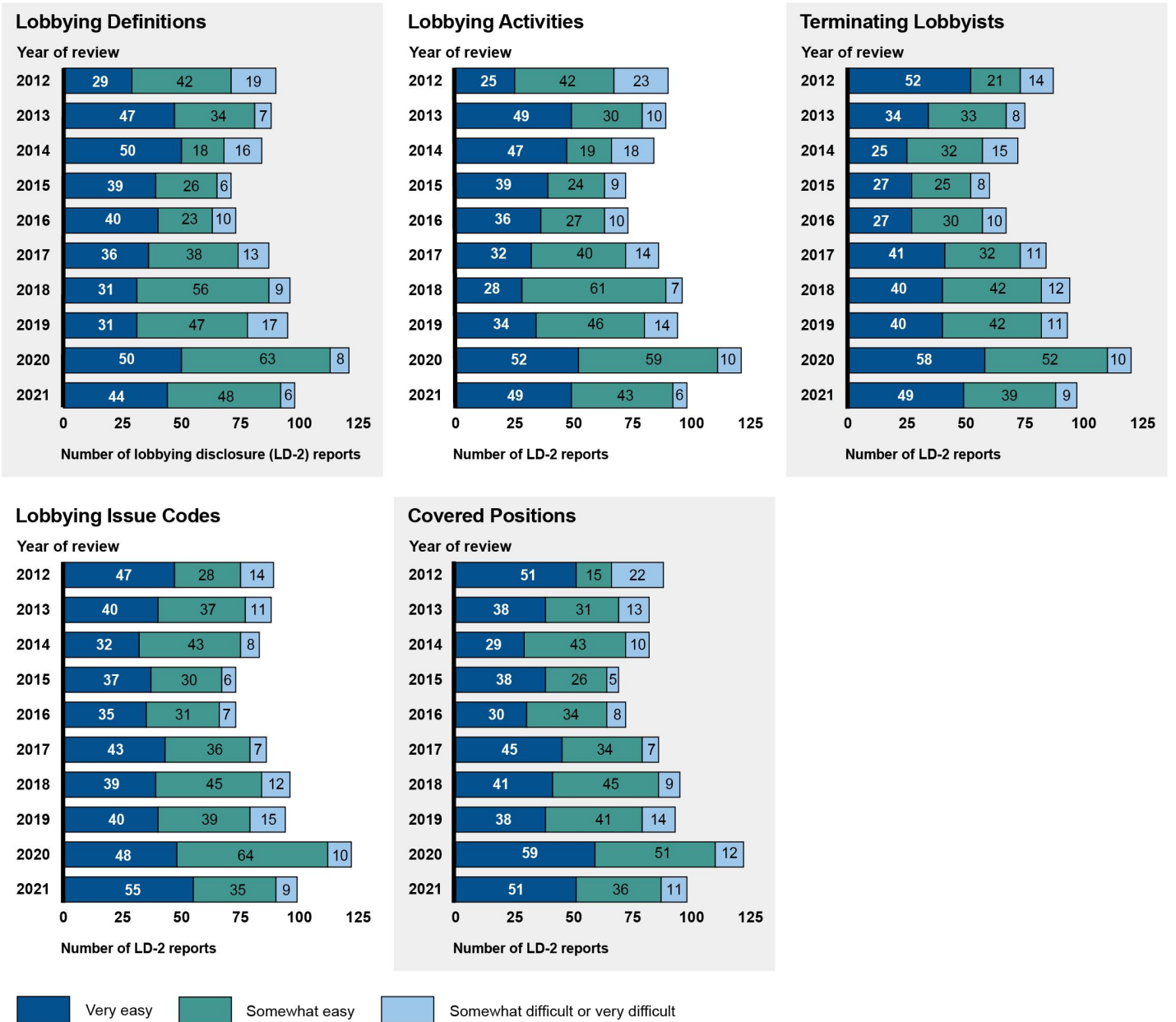
LD-2 reports with documentation, and whether those changes were statistically significant. In 2020, the sample size increased to 129, as we oversampled lobbyists in the event we received lower response rates during the COVID-19 pandemic.

Most lobbyists we surveyed rated the definitions of terms used in LD-2 reporting as “very easy” or “somewhat easy” to understand with regard to meeting the reporting requirements. This is consistent with prior reviews. Figure 9 shows what lobbyists reported as their ease of understanding the terms associated with LD-2 reporting requirements from 2013 through 2021.<sup>30</sup>

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<sup>30</sup>Some lobbyists may not have responded to all of the questions about their ease of understanding the terms associated with LD-2 reporting requirements. Therefore, the number of responses may be inconsistent with the number of different lobbying firms in figure 9.

Figure 9: Ease of Understanding Key Lobbying Terms, 2012 through 2021



Source: GAO analysis of survey results. | GAO-22-105181

Accessible Data for Figure 9: Ease of Understanding Key Lobbying Terms, 2012 through 2021

**Lobbying Definitions**

Year of review	Number of very easy lobbying disclosure (LD-2) reports	Number of somewhat easy lobbying disclosure (LD-2) reports	Number of somewhat difficult or very difficult lobbying disclosure (LD-2) reports
2012	29	42	19
2013	47	34	7
2014	50	18	16
2015	39	26	6
2016	40	23	10
2017	36	38	13
2018	31	56	9
2019	31	47	17
2020	50	63	8
2021	44	48	6

**Lobbying Activities**

Year of review	Number of very easy lobbying disclosure (LD-2) reports	Number of somewhat easy LD-2 reports	Number of somewhat difficult or very LD-2 reports
2012	25	42	23
2013	49	30	10
2014	47	19	18
2015	39	24	9
2016	36	27	10
2017	32	40	14
2018	28	61	7
2019	34	46	14
2020	52	59	10
2021	49	43	6

**Terminating Lobbyists**

Year of review	Number of very easy lobbying disclosure (LD-2) reports	Number of somewhat easy LD-2 reports	Number of somewhat difficult or very LD-2 reports
2012	52	21	14
2013	34	33	8
2014	25	32	15
2015	27	25	8
2016	27	30	10
2017	41	32	11
2018	40	42	12
2019	40	42	11
2020	58	52	10
2021	49	39	9

**Lobbying Issue Codes**

Year of review	Number of very easy lobbying disclosure (LD-2) reports	Number of somewhat easy LD-2 reports	Number of somewhat difficult or very LD-2 reports
2012	47	28	14
2013	40	37	11
2014	32	43	8
2015	37	30	6
2016	35	31	7
2017	43	36	7
2018	39	45	12
2019	40	39	15
2020	48	64	10
2021	55	35	9

**Covered Positions**

Year of review	Number of very easy lobbying disclosure (LD-2) reports	Number of somewhat easy LD-2 reports	Number of somewhat difficult or very LD-2 reports
2012	51	15	22
2013	38	31	13
2014	29	43	10
2015	38	26	5
2016	30	34	8
2017	45	34	7
2018	41	45	9
2019	38	41	14
2020	59	51	12
2021	51	36	11

Note: The number of possible responses varies because of changes in sample size over time. Smaller sample sizes in prior years have limited our ability to identify changes in the percentage of LD-2 reports with documentation, and whether those changes were statistically significant. In 2020, the sample size increased to 129, as we oversampled lobbyists in the event we received lower response rates during the COVID-19 pandemic.

**USAO Continues to Enforce the LDA**

**USAO Has Resources and Authorities to Enforce LDA Compliance**

Officials from USAO stated that they continue to have sufficient personnel resources and authority under the LDA to enforce reporting requirements. Enforcement includes pursuing civil or criminal penalties for noncompliance. Noncompliance refers to a lobbyist’s failure to comply with the LDA. According to USAO officials, they have one full-time permanent program compliance coordinator; one paralegal specialist assigned part time; and one full time civil investigator. In addition, a criminal assistant U.S. attorney and civil assistant U.S. attorneys are also available as required to pursue criminal or civil penalty actions.

USAO officials stated that registrants resolve their noncompliance issues by filing their outstanding reports, and when applicable, paying a fine.<sup>31</sup> Resolving referrals can take anywhere from a few days to years, depending on the circumstances.<sup>32</sup> During this time, USAO creates summary reports from its database to track the overall number of referrals that are pending or become compliant as a result of the lobbyist receiving an email, phone call, or noncompliance letter. Referrals remain in the pending category until they are resolved. The pending category is divided into the following areas: “initial research for referral,” “responded but not compliant,” “no response/waiting for a response,” “bad address,” and “unable to locate.” USAO officials noted that they attempt to review and update all pending cases every 6 months.

USAO focuses its enforcement efforts primarily on the “responded but not compliant” and the “no response/waiting for a response” groups. In prior years, officials told us that, if after several unsuccessful attempts, USAO cannot contact the noncompliant lobbyist, it confers with both the Secretary of the Senate and the Clerk of the House to determine whether further action is needed.

In cases where the lobbyist is repeatedly referred for not filing disclosure reports but does not appear to be actively lobbying, USAO suspends enforcement actions. USAO officials reported they continue to monitor these lobbyists and will resume enforcement actions if appropriate.

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## Status of LD-2 Enforcement Efforts

USAO received 3,473 referrals from both the Secretary of the Senate and the Clerk of the House for failure to comply with LD-2 reporting requirements cumulatively for filing years 2012 through 2021. Figure 10 shows the number and status of the referrals received and the number of enforcement actions taken by USAO to bring lobbyists into compliance.

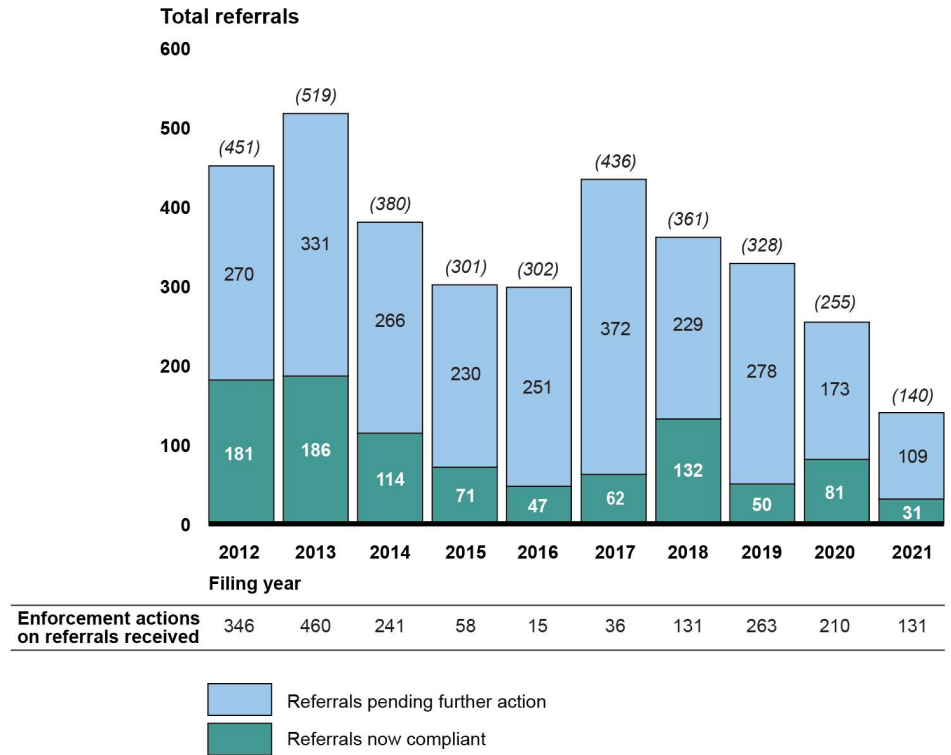
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<sup>31</sup>The LDA refers to a lobbyist that files an initial registration (LD-1) as a “registrant.” 2 U.S.C. § 1603(a)-(d). The LDA then requires the registrant to file quarterly reports (LD-2) and semiannual reports (LD-203). 2 U.S.C. § 1604(a), (d)(1).

<sup>32</sup>Referrals are required notifications that the Secretary of the Senate and the Clerk of the House send to USAO about a lobbyist’s possible noncompliance with the LDA. 2 U.S.C. § 1605(a)(8).

Enforcement actions include USAO attempts to bring lobbyists into compliance through letters, emails, and calls.<sup>33</sup>

**Figure 10: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure Reporting, 2012 through 2021 (as of February 2022)**



Source: U.S. Attorney's Office for the District of Columbia. | GAO-22-105181

<sup>33</sup>Referrals can include multiple parts, such as LD-2s that were not filed for several clients or LD-203s that were not filed for several lobbyists. A referral cannot be in compliance unless all the parts have been resolved. Enforcement actions reflect attempts to bring each part of the referral into compliance.



**Accessible Data for Figure 10: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure Reporting, 2012 through 2021 (as of February 2022)**

Filing year	Referrals now Compliant	Referrals pending further action	Enforcement Actions on Referrals Received
2012	181	270	346
2013	186	331	460
2014	114	266	241
2015	71	230	58
2016	47	251	15
2017	62	372	36
2018	132	229	131
2019	50	278	263
2020	81	173	210
2021	31	109	131

Note: Referrals may be received by the U.S. Attorney’s Office for the District of Columbia months or years after the filing period for which they relate.

According to USAO data, about 28 percent (955 of 3,473) of the total referrals received were compliant as of February 22, 2022, because lobbyists filed their outstanding reports. In addition, some of the referrals were found to be compliant when USAO received the referral, so no action was taken. This may occur when lobbyists respond to the contact letters from the Secretary of the Senate and the Clerk of the House after USAO received the referrals.

About 72 percent (2,509 of 3,473) of referrals were pending further action because USAO could not locate the lobbyists, did not receive a response from the lobbyists after an enforcement action, or plans to conduct additional research to determine if it can locate the lobbyist. The remaining nine referrals (less than 1 percent) did not require action or were suspended because the lobbyist or client was no longer in business or the individual lobbyist was deceased.

### Status of LD-203 Referrals

LD-203 referrals consist of two types: (1) LD-203(R) referrals represent lobbyists that have failed to file LD-203 reports for their lobbying firms and (2) LD-203 referrals represent the individual lobbyists at the lobbying firm

who have failed to file their individual LD-203 reports as required.<sup>34</sup> USAO received 2,291 LD-203(R) referrals for lobbying firms (cumulatively from 2012 through 2021) and 6,323 LD-203 referrals for individual lobbyists (cumulatively from 2012 to 2020) from the Secretary of the Senate and the Clerk of the House for noncompliance with reporting requirements.

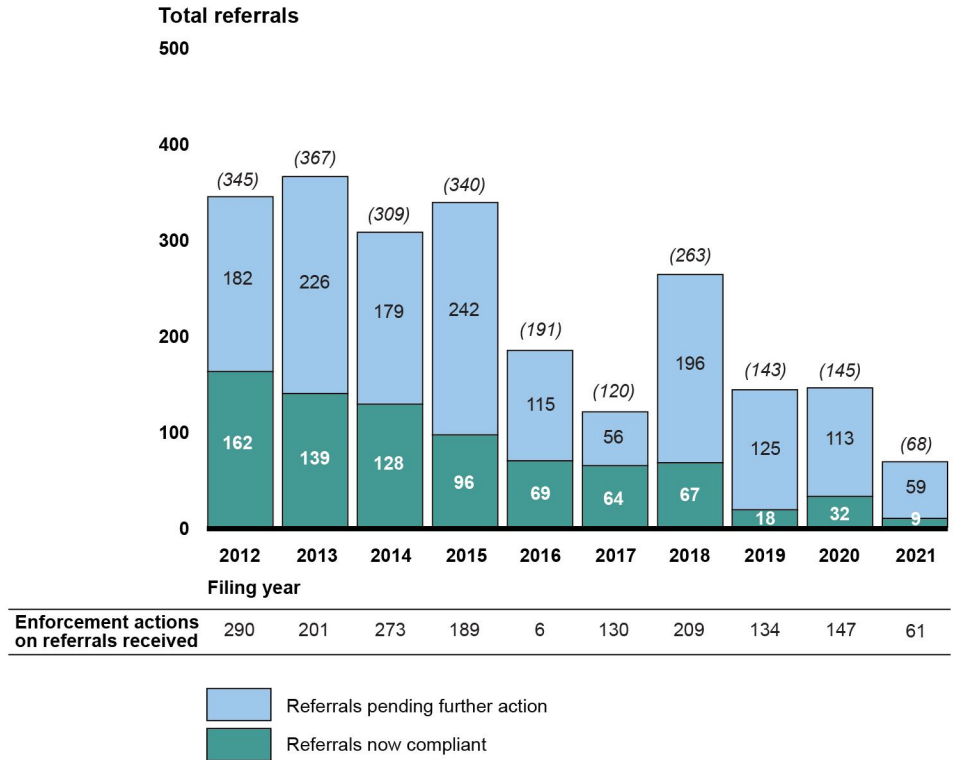
LD-203 referrals are more complicated than LD-2 referrals because both the lobbying firm and the individual lobbyists within the firm are each required to file an LD-203. Lobbyists employed by a lobbying firm typically use the firm's contact information and not the lobbyists' personal contact information. According to USAO officials, this makes it difficult to locate an individual lobbyist who is not in compliance, particularly one who may have left the firm. Lobbyists who repeatedly fail to file reports are labeled by USAO officials as chronic offenders and referred to assigned attorneys for further enforcement action.

USAO officials said that many lobbying firms have assisted USAO by providing contact information for individual lobbyists. USAO officials told us that they collaborate with other law enforcement agencies, and use web searches and online databases, to find these missing individual lobbyists, but they are not always successful. Figure 11 shows the status of LD-203(R) referrals received and the number of enforcement actions taken by USAO to bring lobbying firms into compliance.

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<sup>34</sup>The use of the term "lobbying firms" in this context includes organizations with in-house lobbyists and self-employed individuals. A self-employed lobbyist must file two LD-203s, one in the sole proprietorship business name and one as an individual lobbyist.

**Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure, Lobbying Firms Only, 2012 through 2021 (as of February 2022)**



Source: U.S. Attorney's Office for the District of Columbia. | GAO-22-105181

**Accessible Data for Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure, Lobbying Firms Only, 2012 through 2021 (as of February 2022)**

Filing year	Referrals now Compliant	Referrals pending further action	Enforcement Actions on Referrals Received
2012	162	182	290
2013	139	226	201
2014	128	179	273
2015	96	242	189
2016	69	115	6
2017	64	56	130
2018	67	196	209
2019	18	125	134
2020	32	113	147
2021	9	59	61

Note: Referrals may be received by the U.S. Attorney’s Office for the District of Columbia months or years after the filing period to which they relate. No referrals have been received for 2021. Referrals may be received by the U.S. Attorney’s Office for the District of Columbia months or years after the filing period to which they relate.

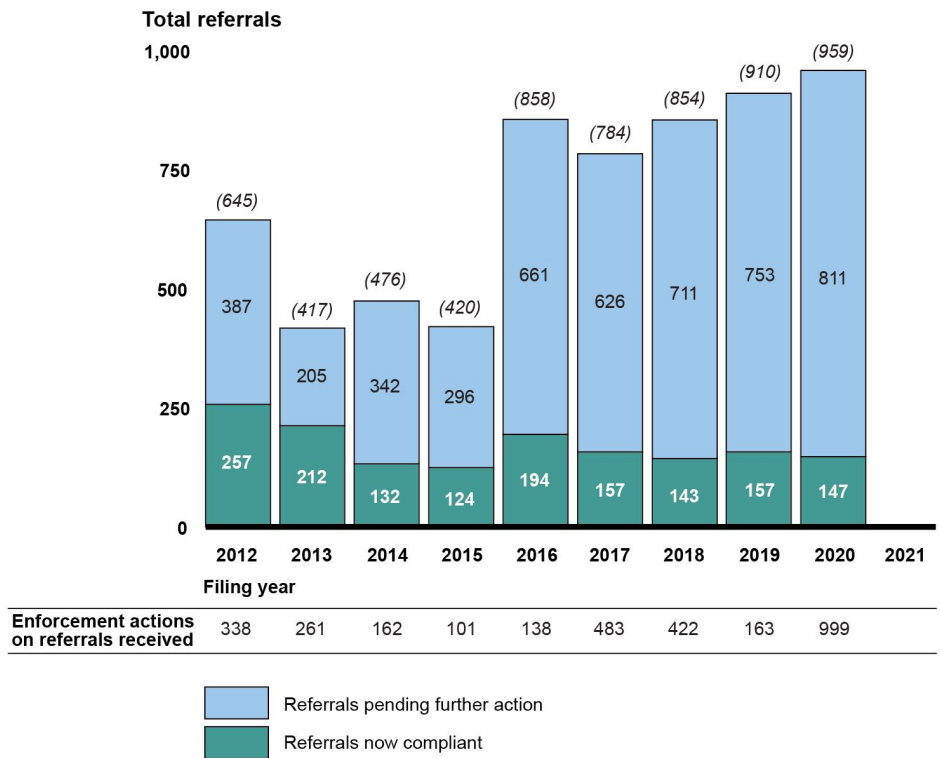
About 34 percent (784 of 2,291) of the lobbying firms referred by the Secretary of the Senate and Clerk of the House for noncompliance from calendar years 2012 through 2021 were compliant as of February 22, 2022, because they filed their outstanding reports. About 65 percent (1,493 of 2,291) of the referrals were pending further action. The remaining 14 referrals either did not require action, were suspended, or the lobbyist was deceased.

USAO received 6,323 LD-203 referrals from the Secretary of the Senate and Clerk of the House for lobbying firms where one or more lobbyists employed by the firm failed to comply with LD-203 reporting requirements for calendar years 2012 through 2020. Figure 12 shows the status of the referrals received and the number of enforcement actions taken by USAO to bring these lobbyists into compliance. In addition, figure 12 shows that about 24 percent (1,523 of 6,323) of the referrals received were in compliance as of February 22, 2022, because all of the listed lobbyists had either filed their reports or were no longer registered as a lobbyist.

About 76 percent (4,792 of 6,323) of the referrals were pending further action because USAO could not locate the lobbyists, did not receive a

response from the lobbyists, or plans to conduct additional research to determine if it can locate the lobbyists. The remaining eight referrals either did not require action, were suspended, or the individual lobbyist was deceased.

**Figure 12: Status of Lobbying Disclosure Act Referrals for Individual Lobbyists Employed at Lobbying Firms, 2012 through 2021 (as of February 2022)**



Source: U.S. Attorney's Office for the District of Columbia. | GAO-22-105181

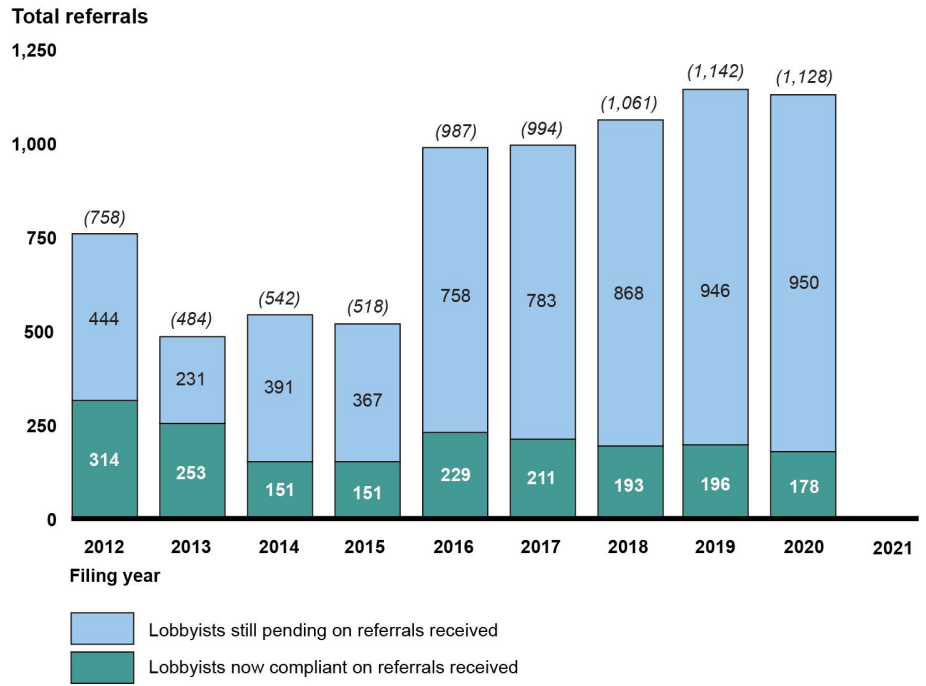
**Accessible Data for Figure 12: Status of Lobbying Disclosure Act Referrals for Individual Lobbyists Employed at Lobbying Firms, 2012 through 2021 (as of February 2022)**

Filing year	Referrals now Compliant	Referrals pending further action	Enforcement Actions on Referrals Received
2012	257	387	338
2013	212	205	261
2014	132	342	162
2015	124	296	101
2016	194	661	138
2017	157	626	483
2018	143	711	422
2019	157	753	163
2020	147	811	999
2021	0	0	0

Note: Referrals may be received by the U.S. Attorney's Office for the District of Columbia (USAO) months or years after the filing period to which they relate. GAO did not receive referral data from USAO for 2021.

USAO received LD-203 referrals from the Secretary of the Senate and the Clerk of the House for 7,614 individual lobbyists who failed to comply with LD-203 reporting requirements for any filing year from 2012 through 2020. Figure 13 shows the status of compliance for individual lobbyists listed on referrals to USAO. About 25 percent (1,876 of 7,614) of the individual lobbyists had come into compliance by filing their reports or are no longer registered as a lobbyist. About 75 percent (5,738 of 7,614) of the referrals were pending action because USAO could not locate the lobbyists, did not receive a response from the lobbyists, or plans to conduct additional research to determine if it can locate the lobbyists.

**Figure 13: Status of Compliance for Lobbying Disclosure Referrals of Individual Lobbyists, 2012 through 2021 (as of February 2022)**



Source: U.S. Attorney's Office for the District of Columbia. | GAO-22-105181

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**Accessible Data for Figure 13: Status of Compliance for Lobbying Disclosure Referrals of Individual Lobbyists, 2012 through 2021 (as of February 2022)**

Filing year	Lobbyists Now Compliant On Referrals Received	Lobbyists Still Pending On Referrals Received
2012	314	444
2013	253	231
2014	151	391
2015	151	367
2016	229	758
2017	211	783
2018	193	868
2019	196	946
2020	178	950
2021	0	0

Note: Referrals may be received by the U.S. Attorney's Office for the District of Columbia (USAO) months or years after the filing period to which they relate. GAO did not receive referral data from USAO for 2021.

USAO officials said that many of the pending LD-203 referrals represent individual lobbyists who no longer lobby for the firms affiliated with the referrals, even though these firms may be listed on the individual lobbyist's LD-203 report.

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### Status of Enforcement Settlement Actions

According to USAO officials, lobbyists who repeatedly fail to file reports are labeled chronic offenders and referred to one of the assigned attorneys for follow-up. USAO also receives complaints regarding lobbyists who are allegedly lobbying but never filed an LD-203. USAO officials added that USAO monitors and investigates chronic offenders to ultimately determine the appropriate enforcement actions, which may include settlement or other civil actions.

USAO has ongoing investigations for individuals and organizations based upon their noncompliance histories. The United States Attorney brought criminal charges against one lobbyist under the Lobbying Disclosure Act in June 2020. The lobbyist was charged with one count under the



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Lobbying Disclosure Act<sup>35</sup>. USAO officials said that USAO continues to review its records to identify additional chronic offenders for further action due to noncompliance.

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## JACK Act Enforcement

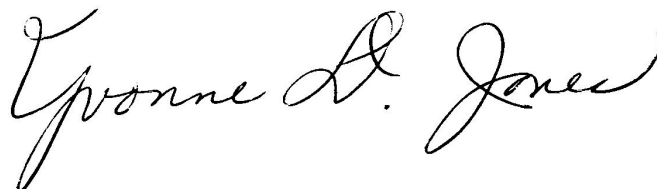
According to USAO, its enforcement role regarding the JACK Act is the same as any other prosecution. If the individual or organization has filed an LD-2 report with misrepresentations, USAO can refer them for criminal prosecution or impose civil penalties under the LDA. As of January, 2022, no referrals have been made under the JACK Act.

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## Agency Comments

We provided a draft of this report to the Department of Justice for review and comment. The Department of Justice did not have comments. However, after we provided a draft of the report to the Department of Justice for review and comment, the agency provided us with updated data as of February 2022. This report reflects the updated data. We are sending copies of this report to the Attorney General, the Secretary of the Senate, the Clerk of the House of Representatives, and appropriate congressional committees and members. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov). Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix IV.



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<sup>35</sup>On June 25, 2020, the lobbyist Jack Abramoff was charged in the District Court, Northern District of California, in the first criminal prosecution for violating the LDA, among other things. Mr. Abramoff was charged with one count of failure to comply with the LDA. He subsequently pled guilty to the charge on July 14, 2020.

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Letter

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Yvonne D. Jones  
Director, Strategic Issues

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*List of Committees*

The Honorable Gary C. Peters  
Chairman  
The Honorable Rob Portman  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Dick Durbin  
Chairman  
The Honorable Chuck Grassley  
Ranking Member  
Committee on the Judiciary  
United States Senate

The Honorable Amy Klobuchar  
Chairwoman  
The Honorable Roy Blunt  
Ranking Member  
Committee on Rules and Administration  
United States Senate

The Honorable Zoe Lofgren  
Chairwoman  
The Honorable Rodney Davis  
Ranking Member  
Committee on House Administration  
House of Representatives

The Honorable Jerrold Nadler  
Chairman  
The Honorable Jim Jordan  
Ranking Member  
Committee on the Judiciary  
House of Representatives

The Honorable Carolyn B. Maloney  
Chairwoman  
The Honorable James Comer  
Ranking Member  
Committee on Oversight and Reform  
House of Representatives

# Appendix I: List of Lobbyists and Clients for Sampled Lobbying Disclosure Reports

The random sample of lobbying disclosure reports we selected was based on unique combinations of House ID, lobbyist, and client names (see table 3).

**Table 3: Names of Lobbyists and Clients Selected in Random Sampling of Lobbyist Disclosure Reports Filed in the Third and Fourth Quarters of 2020 and First and Second Quarters of 2021**

Lobbyists	Clients
Akin, Gump, Strauss, Hauer & Feld	US Physician Partners (Informal Coalition)
Albertine Enterprises, Inc.	International Brotherhood of Teamsters / Airline Express Delivery Divisions
Alcalde & Fay	Tampa Port Authority
Alliance For Patient Access	Alliance For Patient Access
American Capitol Group	MD Save
Amnesty International of the USA, Inc.	Amnesty International of the USA, Inc.
B+S Strategies	Airlines for America
BGR Government Affairs	White & Case LLP On Behalf Of Dana Holdings Limited
Bockorny Group, Inc.	American Resort Development Association
Boundary Stone Partners	TerraPower, LLC
Brownstein Hyatt Farber Schreck, LLP	Rocky Mountain Industrials fra RMR Industrials
Building and Construction Trades Dept., AFL-CIO	Building and Construction Trades Dept., AFL-CIO
Campaign for Tobacco-Free Kids	Campaign for Tobacco-Free Kids
Cansler Consulting, LLC	California Agricultural Commissioners and Sealers Association
Capitol Counsel LLC	NCTA - The Internet & Television Association (FKA Nat'L Cable & Telecom Assoc.)
Capitol Counsel, LLC	NIKE, Inc.
Capitol Counsel, LLC	Amalgamated Bank
Capitol Hill Consulting Group	Knife Rights, Inc.
Capitol Integration	AdvanTec Global
Capitol Point Group, LLC	Lufthansa German Airlines
Cassidy & Associates, Inc.	Bradley University
Cassidy & Associates, Inc.	LS Power
Chambers, Conlon & Hartwell, LLC	Southern California Regional Rail Authority

**Appendix I: List of Lobbyists and Clients for  
Sampled Lobbying Disclosure Reports**

<b>Lobbyists</b>	<b>Clients</b>
Cogent Strategies LLC	Sotheby'S
Commonwealth Strategic Partners, LLC	Churchill Mortgage
Cornerstone Government Affairs, Inc.	Marshall University Research Corp.
Cornerstone Government Affairs, Inc.	Saab Barracuda
Cozen O'Connor Public Strategies	Ambac Assurance Corporation
Cypress Advocacy, LLC	LPL Financial LLC
Doctors Hospital at Renaissance	Doctors Hospital at Renaissance
Dutko Worldwide, LLC	Wyelands Capital
Edgepoint, LLC	Fayetteville Technical Community College
ENS Resources, Inc.	Chevron, USA, Inc.
ENS Resources, Inc.	City of San Buenaventura
FDJ Solutions, LLC	Eaves Law Firm, LLC
Forbes-Tate	Altria Client Services LLC
Forbes-Tate	Insured Retirement Institute
Gephardt Group Government Affairs	Prairie State Generating Company
Gray & Oscar, LLC (formerly Bob Gray, LLC)	Steamfitters Local 420
Griffin Global Outreach LLC	Engineering And Software System Solutions, Inc. Dba Es3
GRTyree Consulting LLC <sup>b</sup>	Mescalero Apache Telecom, Inc.
Health and Medicine Counsel of Washington	St. George's University School of Medicine
Hobart Hallaway & Quayle Ventures, LLC	Scaletta Moloney Armoring Corp. dba Scaletta Armoring
Holland & Knight LLP	Peninsula Corridor Joint Powers Board
Horizon Government Affairs	HCA Management Services, L.P.
HURT, NORTON & ASSOCIATES, INC.	JCB, Inc.
Invariant LLC	Accenture LLP
John Mckechnie LLC	Tennessee Credit Union League
Kanner & Associates, LLC	Enervision
Linde Inc.	Linde Inc., Linde, plc and other entities related to Linde, plc
Liz Williams and Company	Altria Client Services LLC
Madison Services Group, Inc	GovEvolve
Magellan Health, Inc.	Magellan Health, Inc.
Mr. Dan Perrin <sup>b</sup>	Alliance of Health Care Sharing Ministries
Mr. Philip Maggi	BioFire Defense LLC
Mr. Richard F. Hohlt <sup>b</sup>	SK Hynix America, Inc
Murray, Montgomery & O'Donnell	City of Healdsburg
Natural Resource Results LLC	Scenic Hudson
Peck Madigan Jones	Johnson Controls Inc.
Perkins Coie, LLP	Kent School

**Appendix I: List of Lobbyists and Clients for  
Sampled Lobbying Disclosure Reports**

<b>Lobbyists</b>	<b>Clients</b>
Potomac Partners DC <sup>a</sup>	El Paso County, CO
Professional Services Council	Professional Services Council
Public Strategies Washington, Inc.	Cleveland Clinic Foundation
Saab, Inc. (fka Saab Defense and Security USA LLC)	Saab, Inc. (fka Saab Defense and Security USA LLC)
Sierra Nevada Corporation	Sierra Nevada Corporation
Sirona Strategies LLC	Aligning for Health
Sivon Natter & Wechsler, P.C.	Consumer First Coalition
Smiths Group Services Corporation	Smiths Group Services Corporation
Squire Patton Boggs	TransDigm Group Incorporated
Steptoe & Johnson LLP	Democracy Fund Voice
Steptoe & Johnson LLP	Council of Insurance Agents and Brokers
Steptoe & Johnson LLP	Alliant Energy
Strategic Marketing Innovations	United States Footwear Manufacturers Association (Fka Rpfma)
Subject Matter (fka Elmendorf Ryan)	Pac-12 Conference
Sullivan Strategies LLC (FKA SB Capitol Solutions)	Center for Transportation and the Environment
Telecommunications Industry Association	Telecommunications Industry Association
The CJR Group, Inc.	Cleveland State University
The Dow Chemical Company, dba Dow	The Dow Chemical Company, dba Dow
The Ferguson Group, LLC	Mooresville-NC, Town of
The Ferraro Group	The Rogosin Institute
The Fiorentino Group	SNCF America, Inc.
The Friedkin Group, Inc.	The Friedkin Group, Inc.
The Keelen Group, LLC	United Brotherhood of Carpenters
The Livingston Group, L.L.C.	Junior Achievement USA
The National Alliance for Eye and Vision Research	The National Alliance for Eye and Vision Research
The Nature Conservancy	The Nature Conservancy
The Simmons & Russell Group, LLC	ExxonMobil Corporation
The Smith-Free Group, LLC	Scotch Whisky Association
The Society of Thoracic Surgeons	The Society of Thoracic Surgeons
Todd Strategy, LLC dba Todd Strategy Group	Veracyte, Inc.
Townsend Public Affairs	City Of Stanton
Troutman Pepper Strategies, LLC (fka Troutman Sanders Public Affairs Group, LLC)	Aaron's Inc.
U.S. Global Leadership Campaign	U.S. Global Leadership Campaign
University of Central Florida	University of Central Florida
Van Fleet Associates	Full Spectrum Omega, Inc.
Van Scoyoc Associates	Community Funds, Inc. dba The New York Community Trust

**Appendix I: List of Lobbyists and Clients for  
Sampled Lobbying Disclosure Reports**

<b>Lobbyists</b>	<b>Clients</b>
Van Scoyoc Associates	B.E. Meyers & Co., Inc.
Van Scoyoc Associates	County of Orange, California
Vectis DC	Women's College Coalition
W Strategies, LLC	Secure Identity, LLC
Ward And Smith, P.A.	Town Of Holden Beach
Williams And Jensen, PLLC	Sanofi, U.S.
Winning Strategies Washington	Olivian
Ziontz Chestnut	Fallon Paiute-Shoshone Tribe

Source: Lobbying disclosure database of the Clerk of the House of Representatives for the third and fourth quarters of 2020 and the first and second quarters of 2021. | GAO-22-105181

<sup>a</sup>Lobbyist did not respond to our requests to participate in the survey.

<sup>b</sup>Lobbyists were excluded from participation in our survey due to hardship experienced by the lobbyists.

## Appendix II: List of Sampled Lobbying Contribution Reports with and without Contributions Listed

**Table 4: Lobbyists in Sample of Lobbying Contribution Reports with Contributions Listed, Filed Year-End 2020 or Midyear 2021**

<b>Lobbyists</b>	<b>Reporting period</b>
4C Communications, Inc.	Year-end 2020
Alan Rosenbloom	Midyear 2021
American Retirement Association	Year-end 2020
American Sugar Beet Growers Association	Year-end 2020
Amy Sandgren Plaster	Year-end 2020
Anesthesia Service Medical Group Advocacy Fund	Year-end 2020
Anthony Livingston	Midyear 2021
Applied Research Associates APC	Midyear 2021
Assurant, Inc. PAC	Year-end 2020
Barclays Card	Year-end 2020
Bella Sewall Wolitz	Midyear 2021
Ben Vonachen	Year-end 2020
Benjamin J. Wallner	Midyear 2021
Brian D. Vanderbloemen	Midyear 2021
CEMEX, Inc. Employees PAC	Midyear 2021
Chad Schulken	Midyear 2021
Charles E. Symington	Midyear 2021
Clark Street Associates, LLC PAC	Midyear 2021
Craig S. Brightup	Midyear 2021
Curtis John Legeyt	Midyear 2021
CVS Health PAC	Midyear 2021
Daniel Ritter	Midyear 2021
Dean R. Sackett	Year-end 2020
DGA Victory Fund	Midyear 2021
Dustin Todd	Year-end 2020
Edward Randall Royce	Midyear 2021



**Appendix II: List of Sampled Lobbying  
Contribution Reports with and without  
Contributions Listed**

<b>Lobbyists</b>	<b>Reporting period</b>
Farmers Educational Cooperative Union of America	Midyear 2021
George Laws Garcia	Year-end 2020
Harrison Allen	Year-end 2020
Helen Devlin	Midyear 2021
Isaac A. Fordjour	Year-end 2020
Jake Perry	Year-end 2020
Jameel William Aalim-Johnson	Year-end 2020
Jason Goggins	Midyear 2021
Jeff Navin	Year-end 2020
Jeffrey Speaks	Midyear 2021
Jeremy Craig Empol	Year-end 2020
Jeremy Pederson	Midyear 2021
John W. Timmons	Midyear 2021
Kenneth J. Klein	Midyear 2021
Kevin J. Brosch	Year-end 2020
King & Spalding Committee PAC	Midyear 2021
Kirsten Chadwick	Year-end 2020
Laine Evans Striegel	Year-end 2020
Layth Sami Elhassani	Year-end 2020
Lehigh Hanson, Inc. PAC	Midyear 2021
Marie Sanderson	Midyear 2021
Marjorie Strayer Prindle	Midyear 2021
Marsha Greenfield	Year-end 2020
Mathew Sturges	Year-end 2020
Michael Anthony Shupp	Midyear 2021
Michael Goodman	Midyear 2021
Michael R. Duenas	Midyear 2021
Mitchell Moonier	Year-end 2020
Mr. Paul Schroeder	Year-end 2020
Mr. Thomas Kahn	Year-end 2020
NASDAQ, Inc. PAC	Midyear 2021
National Agricultural Aviation Association	Year-end 2020
Pacific Life Insurance Company	Year-end 2020
Peter J. Roskam	Year-end 2020
Philip Vaughn	Year-end 2020
Phillip Cronin	Year-end 2020
Rachel Hicks	Year-end 2020

**Appendix II: List of Sampled Lobbying  
Contribution Reports with and without  
Contributions Listed**

<b>Lobbyists</b>	<b>Reporting period</b>
Ralph Hellman	Year-end 2020
Regina Maria Sherick	Midyear 2021
Robert F. Hagan	Year-end 2020
Roberto Adrian Haddad	Midyear 2021
Scott H. Segal	Year-end 2020
Select Medical Corporation PAC	Year-end 2020
Shelley Stewart	Year-end 2020
Stephen Adam Francis	Year-end 2020
Stephen Pastrick	Midyear 2021
Steven R. Phillips	Midyear 2021
Theodore Okon	Year-end 2020
Thomas Edwards	Midyear 2021
Tim Donovan	Midyear 2021
Todd Bertson	Year-end 2020
USA Rice Federation	Midyear 2021
Walmart, Inc. PAC for Responsible Government	Midyear 2021
Williams and Jensen, PLLC	Midyear 2021

Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2020 and midyear reports for calendar year 2021. | GAO-22-105181

**Appendix II: List of Sampled Lobbying  
Contribution Reports with and without  
Contributions Listed**

**Table 5: Lobbyists in Random Sample of Lobbying Contribution Reports without Contributions Listed, Filed Year-End 2020 or Midyear 2021**

<b>Lobbyists</b>	<b>Reporting period</b>
Alan Inouye	Midyear 2021
Alexandria Tran	Year-end 2020
Alison O'Donnell	Midyear 2021
Alliance for Patient Access	Year-end 2020
American Bird Conservancy	Year-end 2020
American Health Care Association PAC	Year-end 2020
American Institute of Architects	Year-end 2020
Ann Loomis	Midyear 2021
Ashley Durmer	Year-end 2020
Caroline Anne Hoyt	Year-end 2020
Cathy A. Ball	Year-end 2020
Charles M. Clapton	Year-end 2020
Charles Purcell Adams	Midyear 2021
Charles Randal Nuckolls	Midyear 2021
Coalition on Human Needs	Year-end 2020
Colleen Kelleher Purcell	Year-end 2020
Crestview Strategy US, LLC	Midyear 2021
Curtis Lee Decker	Midyear 2021
Danielle Neal	Midyear 2021
Douglas P. Wheeler	Midyear 2021
Douglas R. Morris	Year-end 2020
Eric Keber	Year-end 2020
Eugene Trisko	Midyear 2021
G2 Strategies	Midyear 2021
Gabrielle Friedman	Midyear 2021
Gavin Lindberg	Year-end 2020
J. David Grossman	Midyear 2021
James Carlisle	Year-end 2020
Jason Scull	Midyear 2021
John Charles Zang	Midyear 2021
Joo Young Lee	Year-end 2020
Joshua Adam Jones	Year-end 2020
Joshua Shields	Midyear 2021
JV Schwan	Year-end 2020

**Appendix II: List of Sampled Lobbying  
Contribution Reports with and without  
Contributions Listed**

<b>Lobbyists</b>	<b>Reporting period</b>
Kareem Dale	Midyear 2021
Karen Sealander	Year-end 2020
Katie R. Larson	Midyear 2021
Khary Isiah Cauthen	Midyear 2021
Kimberly Glas	Year-end 2020
Large Public Power Council	Year-end 2020
Leah McCormick Howard	Year-end 2020
Lowell Warren Randel	Year-end 2020
Mariah Shriner	Year-end 2020
Mark Cothran	Midyear 2021
Martin G. Malsch	Midyear 2021
Matthew Chiller	Midyear 2021
Matthew R. Cox	Midyear 2021
Max Markham	Midyear 2021
MBDA Incorporated	Midyear 2021
Megan Gordonon	Year-end 2020
Michael Powell	Year-end 2020
Michael Roeder	Midyear 2021
Minnesota Farm Bureau Federation	Midyear 2021
Neela Swanson	Midyear 2021
Nick Goldstein	Midyear 2021
NWG Advocacy LLC	Year-end 2020
Ochsner Clinic Foundation	Midyear 2021
Olsson Frank Weeda Terman Matz PAC	Midyear 2021
Owen Reilly	Year-end 2020
Patrick Krekels	Midyear 2021
Paul G. Martino	Year-end 2020
Peter Judge	Year-end 2020
Peter Norman	Year-end 2020
Preti, Flaherty, Beliveau & Pachios, Chartered, LLP	Year-end 2020
Professional Photographers of America/Alliance of Visual Artists	Year-end 2020
Reese Edmondson Goldsmith	Year-end 2020
Robin Douglas Ferriby	Midyear 2021
Roman Gonzales	Midyear 2021
Sandra Fulton	Year-end 2020
Sandra Luff	Midyear 2021
Scott Everett Talbott	Year-end 2020

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**Appendix II: List of Sampled Lobbying  
Contribution Reports with and without  
Contributions Listed**

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<b>Lobbyists</b>	<b>Reporting period</b>
Shannon Meissner	Midyear 2021
Shukria Dellawar	Midyear 2021
Steven Boms	Year-end 2020
The Good Food Institute	Year-end 2020
Tiffany Joy Howard	Midyear 2021
Timothy William Kennedy	Year-end 2020
Velocity Government Relations, LLC	Year-end 2020
Volkswagen Group of America, Inc.	Midyear 2021
Winward Strategies	Midyear 2021

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Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2020 and midyear reports for calendar year 2021. | GAO-22-105181

## Appendix III: Objectives, Scope, and Methodology

Our objectives were to (1) determine the extent to which lobbyists are able to demonstrate compliance with the requirements for registrations and reports filed under the Lobbying Disclosure Act of 1995, as amended (LDA); (2) identify any challenges or potential improvements to compliance by lobbyists; and (3) describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) in its role in enforcing LDA compliance and any efforts it has made to improve that enforcement.<sup>1</sup>

We used information in the lobbying disclosure database maintained by the Clerk of the House of Representatives (Clerk of the House). To assess whether these disclosure data were sufficiently reliable for the purposes of this report, we reviewed relevant documentation and consulted with knowledgeable officials. Although registrations and reports are filed through a single web portal, each chamber subsequently receives copies of the data and follows different data-cleaning, processing, and editing procedures before storing the data in either individual files (in the House) or databases (in the Senate). Currently, there is no means of reconciling discrepancies between the two databases caused by the differences in data processing. For example, Senate staff told us during previous reviews they set aside a greater proportion of registration and report submissions than the House for manual review before entering the information into the database. As a result, the Senate database would be slightly less current than the House database on any given day pending review and clearance.

House staff told us during previous reviews that they rely heavily on automated processing. In addition, while they manually review reports that do not perfectly match information on file for a given lobbyist or client, staff members approve and upload such reports as originally filed by each lobbyist, even if the reports contain errors or discrepancies (such as a variant on how a name is spelled). Nevertheless, we do not have reasons

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<sup>1</sup>For the purposes of our report, we use the term lobbyist to refer to individual lobbyists, lobbying firms (including self-employed individuals who are lobbyists), and organizations with in-house lobbyists, unless noted otherwise.

to believe that the content of the Senate and House systems would vary substantially.

Based on interviews with knowledgeable officials and a review of documentation, we determined that House disclosure data were sufficiently reliable for identifying a sample of quarterly disclosure reports (LD-2) and for assessing whether newly filed lobbyists also filed required reports. We used the House database to sample LD-2 reports from the third and fourth quarters of 2020 and the first and second quarters of 2021, as well as for sampling year-end 2020 and midyear 2021 political contributions reports (LD-203). We also used the database to match quarterly registrations with filed reports. We did not evaluate the Offices of the Secretary of the Senate or the Clerk of the House, both of which have key roles in the lobbying disclosure process. However, we did consult with House Clerk officials, who provided us with general background information at our request.

To assess the extent to which lobbyists could provide evidence of their compliance with reporting requirements, we examined a stratified random sample of 98 LD-2 reports from the third and fourth quarters of 2020 and the first and second quarters of 2021.<sup>2</sup> We excluded reports with no lobbying activity or with income or expenses of less than \$5,000 from our sample.<sup>3</sup> We drew our sample from 55,084 activity reports filed for the third and fourth quarters of 2020 and the first and second quarters of 2021 available in the public House database, as of our final download date for each quarter.

Our sample of LD-2 reports was not designed to detect differences over time. However, we conducted tests of significance for changes from 2012 to 2021 for the generalizable elements of our review. We found that

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<sup>2</sup>Our original sample included 116 randomly selected LD-2 reports, including four additional reports per quarter to supplement the base sample in the case of substantial non-response. After notification of our review, one lobbyist was nonresponsive to requests for participation and we excluded three lobbyists from participation due to hardship experienced by the lobbyists. We selected four alternates from the pool of additional reports and the remaining 12 alternates were not used. Moreover, the LD-2 reports for two lobbyists did not indicate any lobbying activity and were excluded from our analysis of LD-2 reports. Appendix I provides a complete list of lobbyists and clients for sampled lobbying disclosure reports.

<sup>3</sup>LD-2 activity reports with “no lobbying issue activity” and reports with less than \$5,000 in reported income or expenses are filtered out because they do not contain verifiable information on income, expenses, or activity.

results were generally consistent from year to year and there were few statistically significant changes (as noted in our report) after using a Bonferroni adjustment to account for multiple comparisons.<sup>4</sup>

Our sample is based on a stratified random selection and is only one of a large number of samples that we may have drawn. Because each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval. This interval would contain the actual population value for 95 percent of the samples that we could have drawn. The percentage estimates that LD-2 reports have 95 percent confidence intervals of within plus or minus 12 percentage points or fewer of the estimate itself.

We contacted all the lobbyists in our sample and, using a structured web-based survey, asked them to confirm key elements of the LD-2 and whether they could provide written documentation for key elements in their reports, including

- the amount of income reported for lobbying activities;
- the amount of expenses reported on lobbying activities;
- the names of those lobbyists listed in the report;
- the houses of Congress and the federal agencies that they lobbied; and
- the issue codes listed to describe their lobbying activity.

After reviewing the survey results for completeness, we interviewed individual lobbyists or their designees to review the documentation they reported as having on their online survey for selected elements of their respective LD-2 report.

Prior to each interview, we conducted a search to determine whether individual lobbyists properly disclosed their covered positions as required by the LDA. We reviewed the lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Legistorm, and Google. Prior to 2008, individual lobbyists were only required to disclose covered

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<sup>4</sup>A Bonferroni adjustment is a statistical adjustment designed to reduce the chance of making a type-1 inferential error, which is concluding that a difference exists when it is instead an artifact of sampling error. The adjustment raises the threshold for concluding that any single difference is "statistically significant" so that overall the chance of making at least one type-1 error when making multiple comparisons does not exceed a specified level.



official positions held within 2 years of registering as an individual lobbyist for the client.

The Honest Leadership and Open Government Act of 2007 amended that time frame to require disclosure of positions held 20 years before the date the individual lobbyists first lobbied on behalf of the client. Lobbyists are required to disclose previously held covered official positions either on the client registration (LD-1) or on an LD-2 report. Consequently, those who held covered official positions may have disclosed the information on the LD-1 or a LD-2 report filed prior to the report we examined as part of our random sample. Where we found evidence that an individual lobbyist previously held a covered official position and that information was not disclosed on the LD-2 report under review, we conducted an additional review of the publicly available Secretary of the Senate or Clerk of the House database to determine whether the lobbyist properly disclosed the covered official position on a prior report or LD-1. Finally, if an individual lobbyist appeared to hold a covered position that was not disclosed, we asked for an explanation during the interview to ensure that our research was accurate.

In previous reports, we reported the lower bound of a 90 percent confidence interval to provide a minimum estimate of omitted covered positions and omitted contributions with a 95 percent confidence level. We did so to account for the possibility that our searches may have failed to identify all possible omitted covered positions and contributions. As we have developed our methodology over time, we are more confident in the comprehensiveness of our searches for these items. Accordingly, this report presents the estimated percentages for omitted contributions and omitted covered positions rather than the minimum estimates. As a result, percentage estimates for these items differ slightly from the minimum percentage estimates presented in prior reports.

We also reviewed the LD-1s for our sample to identify lobbyists that reported one or more affiliated organizations.<sup>5</sup> This entailed searching the Secretary of the Senate and the Clerk of the House databases for the LD-1s for each lobbyist in our sample. We found that for four lobbyists the LD-1 identified an affiliated organization, for seven lobbyists the LD-1 was

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<sup>5</sup>An “affiliated organization” is an organization that both (1) contributes more than \$5,000 to the lobbying effort; and (2) actively participates in the planning, supervision, or control of the lobbying activities. See 2 U.S.C. § 1603(b) (3); the term “affiliated organization” itself is not found in the law but rather defined in the LDA guidance. See [https://lobbyingdisclosure.house.gov/amended\\_lda\\_guide.html](https://lobbyingdisclosure.house.gov/amended_lda_guide.html).

unavailable to review, and that the remaining 87 lobbyists did not identify an affiliated organization.

The Justice Against Corruption on K Street Act of 2018 (JACK Act) amended the Lobbying Disclosure Act of 1995. It requires that lobbyists disclose in their registrations and quarterly disclosure reports whether individual lobbyists have been convicted of certain criminal acts at the state or federal level. Offenses include bribery, extortion, embezzlement, an illegal kickback, tax evasion, fraud, conflict of interest, making false statements, perjury, or money laundering.

For any individual lobbyist who has been convicted of these offenses, lobbyists must provide the date of the conviction and a description of the offense. Lobbyists were required to begin disclosing this information in their first quarter 2019 LD-2 reports. For each individual lobbyist listed on LD-2 reports filed in 2020 and 2021 for the stratified sample of 98 LD-2s, we conducted a search to determine whether the lobbyists properly disclosed their criminal convictions as required by the LDA. We researched lobbyists' websites, LinkedIn, and Google to positively identify 245 individual lobbyists.

Once we positively identified individual lobbyists, we searched Accurant and Clear, two databases that compile records obtained from public and private sources, for any available information regarding criminal arrests or convictions. Where those search results were unclear, we followed up with criminal background checks. We then compared the results of our searches against criminal offenses specified by the JACK Act. Our research found information for one lobbyist that was relevant to the JACK Act; however, we could not locate any court records. We also could not positively identify one lobbyist due to that person's common name.

In addition to examining the content of the LD-2 reports, we confirmed whether the most recent LD-203 reports had been filed for each lobbyist listed on the LD-2 reports in our random sample. Although this review represents a random selection of lobbyists, it is not a direct probability sample of firms filing LD-2 reports or lobbyists listed on LD-2 reports. As such, we did not estimate the likelihood that LD-203 reports were appropriately filed for the population of lobbyists listed on LD-2 reports.

To determine if the LDA's requirement for lobbyists to file a report in the quarter of registration was met for the third and fourth quarters of 2020 and the first and second quarters of 2021, we used data filed with the Clerk of the House to match newly filed registrations with corresponding

disclosure reports. Using an electronic matching algorithm that includes strict and loose text matching procedures, we identified matching disclosure reports for 4,216, or 91.89 percent, of the 4,588 newly filed registrations.

We began by standardizing client and lobbyist names in both the report and registration files (including removing punctuation and standardizing words and abbreviations, such as “company” and “CO”). We then matched reports and registrations using the House identification number (which is linked to a unique lobbyist-client pair), as well as the names of the lobbyist and client.

For reports we could not match by identification number and standardized name, we also attempted to match reports and registrations by client and lobbyist name, allowing for variations in the names to accommodate minor misspellings or typographical errors. For these cases, we used professional judgment to determine whether cases with typographical errors were sufficiently similar to consider as matches. We could not readily identify matches in the report database for the remaining registrations using electronic means.

To assess the accuracy of the LD-203 reports, we analyzed stratified random samples of LD-203 reports from the 28,851 total LD-203 reports. The first sample contains 80 reports of the 9,030 reports with political contributions and the second contains 80 reports of the 19,821 reports listing no contributions. Each sample contains 40 reports from the year-end 2020 filing period and 40 reports from the midyear 2021 filing period. The samples from 2020 allow us to generalize estimates in this report to either the population of LD-203 reports with contributions or the reports without contributions to within a 95 percent confidence interval of within plus or minus 11 percentage points or fewer. Although our sample of LD-203 reports was not designed to detect differences over time, we conducted tests of significance for changes from 2012 to 2021 and found no statistically significant differences after adjusting for multiple comparisons.<sup>6</sup>

We analyzed the contents of the LD-203 reports and compared them to contribution data found in the publicly available Federal Elections Commission’s (FEC) political contribution database. We consulted with

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<sup>6</sup> We used a Bonferroni adjustment to adjust for three comparisons to account for the 10 pairwise tests for each item examined.

staff at FEC responsible for administering the database. We determined that the data are sufficiently reliable for the purposes of our reporting objectives.

We compared the FEC-reportable contributions on the LD-203 reports with information in the FEC database. The verification process required text and pattern matching procedures so we used professional judgment when assessing whether an individual listed is the same individual filing an LD-203. For contributions reported in the FEC database and not on the LD-203 report, we asked lobbyists to explain why the contribution was not listed on the LD-203 report or to provide documentation of those contributions.

As with covered positions on LD-2 disclosure reports, we cannot be certain that our review identified all cases of FEC-reportable contributions that were inappropriately omitted from a lobbyist's LD-203 report. We did not estimate the percentage of other non-FEC political contributions that were omitted because they tended to constitute a small minority of all listed contributions and cannot be verified against an external source.

To identify challenges to compliance or potential improvements, we sent a structured web-based survey to 116 lobbyists and obtained the views from 99 different lobbyists included in our sample on any challenges to compliance or potential improvements. The number of different lobbyists is 99 because four lobbyists did not respond to the survey and some lobbyists had more than one LD-2 report included in our sample. We calculated responses based on the number of different lobbyists that we contacted rather than the number of interviews. Prior to our calculations, we removed 13 duplicate lobbyists based on the most recent date of their responses. For those cases with the same response date, the decision rule was to keep the cases with the largest assigned case identification number.

To obtain lobbyists' views, we asked them to rate their ease with complying with the LD-2 disclosure requirements using a scale of "very easy," "somewhat easy," "somewhat difficult," or "very difficult." In addition, using the same scale, we asked them to rate the ease of understanding the terms associated with LD-2 reporting requirements.<sup>7</sup>

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<sup>7</sup>Five lobbyists did not respond to the question about their ease of understanding the terms associated with LD-2 reporting requirements.

To describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) and its efforts to improve its LDA enforcement, we interviewed USAO officials. We obtained information on the capabilities of the system officials established to track and report compliance trends and referrals and on other practices established to focus resources on LDA enforcement. USAO provided us with reports from the tracking system on the number and status of referrals and chronically noncompliant lobbyists.

The mandate does not require us to identify lobbyists who failed to register and report in accordance with the LDA requirements or to determine for those lobbyists who did register and report whether all lobbying activity or contributions were disclosed. Therefore, this was outside the scope of our audit.

We conducted this performance audit from April 2021 to April 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Appendix IV: GAO Contact and Staff Acknowledgments

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### GAO Contact

Yvonne D. Jones, (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov)

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### Staff Acknowledgments

In addition to the contact named above, Lisa Pearson (Assistant Director), Tyler Spunaugle (Assistant General Counsel), Erik Shive (Analyst-in-Charge), James Ashley, Maggie Baucom, Daniel Bibeault, Blake Faucher, Lydia Koeller, Amy Konstas, Krista Loose, Bailey McCoy, Amanda Miller, Alan Rozzi, Peter Verchinski, Khristi Wilkins and Alicia White made key contributions to this report.

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## Related GAO Products

*Lobbying Disclosure: Observations on Lobbyists' Compliance with New Disclosure Requirements.* [GAO-08-1099](#). Washington, D.C: September 30, 2008.

*2008 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-09-487](#). Washington, D.C: April 1, 2009.

*2009 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-10-499](#). Washington, D.C: April 1, 2010.

*2010 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-11-452](#). Washington, D.C: April 1, 2011.

*2011 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-12-492](#). Washington, D.C: March 30, 2012.

*2012 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-13-437](#). Washington, D.C: April 1, 2013.

*2013 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-14-485](#). Washington, D.C: May 28, 2014.

*2014 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-15-310](#). Washington, D.C.: March 26, 2015.

*2015 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-16-320](#). Washington, D.C.: March 24, 2016.

*2016 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-17-385](#). Washington, D.C.: March 31, 2017.

*2017 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-18-388](#), Washington, D.C.: March 30, 2018.

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**Related GAO Products**

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*2018 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-19-357](#), Washington, D.C.: March 29, 2019.

*2019 Lobbying Disclosure Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-20-449](#), Washington, D.C.: March 31, 2020.

*2020 Lobbying Disclosure Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-21-375](#), Washington, D.C.: April 1, 2021.



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