

GAO Highlights

Highlights of [GAO-23-105989](#), a report to congressional committees

Why GAO Did This Study

The Lobbying Disclosure Act, as amended, requires lobbyists to file quarterly disclosure reports and semiannual political contribution reports. The law includes a provision for GAO to annually audit the extent of lobbyists' compliance with the act.

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 the U.S. Attorney's Office for the District of Columbia in enforcing compliance. This is GAO's 16th annual report under the provision.

GAO reviewed a stratified random sample of 100 quarterly lobbying disclosure reports filed for the third and fourth quarters of calendar year 2021 and the first and second quarters of calendar year 2022. GAO reviewed two random samples totaling 160 political contribution reports from year-end 2021 and midyear 2022. GAO also surveyed lobbyists in its sample and obtained the views of 95 different lobbyists on challenges or potential improvements to aid compliance.

This methodology allowed GAO to generalize to the population of 62,627 disclosure reports with \$5,000 or more in lobbying activity and 33,991 reports of federal political campaign contributions. GAO also interviewed U.S. Attorney's Office 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-23-105989](#). For more information, contact Yvonne D. Jones at (202) 512-6806 or jonesy@gao.gov.

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2022 LOBBYING DISCLOSURE

Observations on Compliance with Requirements

What GAO Found

For the 2022 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. For lobbying disclosure reports and political contribution reports filed during the third and fourth quarters of 2021 and the first and second quarters of 2022, GAO estimates that

- 93 percent of lobbyists who filed new registrations also filed lobbying disclosure reports as required for the quarter in which they first registered (the figure below describes the typical filing process and enforcement);
- 91 percent of all lobbyists who filed provided documentation for lobbying income and expenses;
- 27 percent of all lobbying disclosure reports included individual lobbyists who had not properly disclosed covered positions on prior reports as required; and
- 7 percent of political contribution reports were missing reportable contributions.

These findings are generally consistent with GAO's findings since 2013. Lobbyists are required to report certain criminal convictions. GAO found that, of the 256 individual lobbyists in its sample, none failed to report a conviction.

Typical Lobbying Disclosure Process



Source: GAO analysis of Lobbying Disclosure Act requirements. | GAO-23-105989

GAO found that most lobbyists in a sample of 95 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 noncompliance, such as not properly disclosing covered positions or misreporting of income or expenses.

The U.S. Attorney's Office for the District of Columbia continued its efforts to resolve noncompliance by having lobbyists file their reports, terminate their registrations, or by pursuing civil and criminal penalties. It received 3,298 referrals from both the Secretary of the Senate and the Clerk of the House for failure to comply with quarterly lobbying disclosure reporting requirements cumulatively for years 2013 through 2022. Of the 3,298 referrals, about 27 percent were compliant and about 73 percent were pending further action, as of January 2023.