

# INSTRUCTIONS FOR COMPLETING THE ELECTRONIC SOURCE OF FUNDING DISCLOSURE

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As part of the required filing of the Client Semi-Annual Report, the reporting of Source of Funding (SoF) is available via the Commission’s online Lobbying Filing System (<http://onlineapps.jcope.ny.gov/LobbyWatch>).

Users must use the pre-formatted Microsoft Excel Spreadsheet to enter all data related to Source of Funding disclosures. Only this pre-formatted Excel Spreadsheet will be accepted for use. If a different form is used, the system will automatically reject the submission.

The SoF Excel Spreadsheet contains twelve (12) columns:

- Source ID
- Type of Source
- Source Name (Entity)
- Source Last Name (Person)
- Source First Name (Person)
- Address
- City
- State
- Zip Code
- Phone
- Date of Contribution
- Amount of Contribution

## Entering Sources

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**Complete all required information for each contribution in each row.**

**\*Additional Instructions for reporting a contribution can be found [here](#)\***

### Source ID Column

You must determine the “ID” number for each *source of funding*. All contributions from that source should have the same source ID number.

	A	B
2	Source ID	Type of Source
3		1 Single
4		2 Single
5		3 Multiple
6		3 Multiple
7		3 Multiple

## Type of Source Column

There are three types of sources – [single](#), [multiple](#), and [affiliated](#).

**Reminder:** You only need to report contributions that exceed \$5,000 in the aggregate over the previous 12 months.

When disclosing a **single source**, identify the entity or individual with its source ID number.

	A	B
2	Source ID	Type of Source
3		1 Single
4		2 Single
5		3 Multiple
6		3 Multiple
7		3 Multiple

When disclosing **multiple or affiliated sources**, identify all entities or individuals that are part of the source with the same Source ID number.

	A	B
2	Source ID	Type of Source
3		1 Single
4		2 Single
5		3 Multiple
6		3 Multiple
7		3 Multiple

## Source Name (Entity) Column

If the source is an [entity](#) (not an individual), enter the name of the entity in this column.

B	C
Type of Source	Source Name (Entity)
Single	ABC CORPORATION
Single	CITIZENS FOR THINGS, LLC
Multiple	XYZ CENTER FOR EXCELLENCE
Multiple	XYZ CENTER FOR EXCELLENCE
Multiple	XYZ CENTER FOR EXCELLENCE

### Source Last Name (Person) Column

If the source is a [person](#), enter their last name in this column.

	C	D	E
2	Source Name (Entity) ▾	Source Last Name (Person) ▾	Source First Name (Person) ▾
3		Jones	Bob
4		Smith	John
5	XYZ CENTER FOR EXCELLENCE		
6	XYZ CENTER FOR EXCELLENCE		
7	XYZ CENTER FOR EXCELLENCE		

### Source First Name (Person) Column

If the source is a [person](#), enter their first name in this column.

	C	D	E
2	Source Name (Entity) ▾	Source Last Name (Person) ▾	Source First Name (Person) ▾
3		Jones	Bob
4		Smith	John
5	XYZ CENTER FOR EXCELLENCE		
6	XYZ CENTER FOR EXCELLENCE		
7	XYZ CENTER FOR EXCELLENCE		

\*Additional Instructions for completing the remaining columns can be found [here](#)\*

## Saving the Spreadsheet

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When you have completed entry of all data related to Source of Funding disclosures; save the file as either an Excel Workbook (.xlsx) or a Comma Separated Values (.csv) file.



# Submitting the Spreadsheet

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## Completing the Source of Funding Section of the Client Semi-Annual Report:

Select "Reporting is required and will be uploaded" on the "Source of Funding" tab of your Client Semi-Annual Report:

The screenshot shows the "Source of Funding" tab selected in a navigation bar. Below the tab, a dropdown menu is open, displaying the following options:

- Reporting is required and will be uploaded
- Reporting is required and filed on paper
- Exemption pending or previously approved
- Reporting is not required - under spending threshold
- Reporting is not required - no applicable contributions
- Reporting not required -501(c)(3) or gov't organization

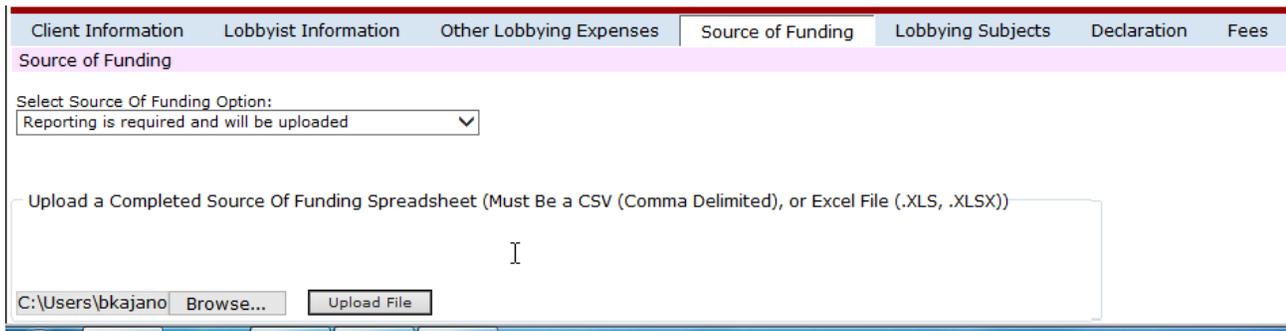
The screenshot shows the "Source of Funding" tab selected. Below the tab, the text "Select Source Of Funding Option:" is followed by a dropdown menu where "Reporting is required and will be uploaded" is selected.

## Uploading the Spreadsheet:

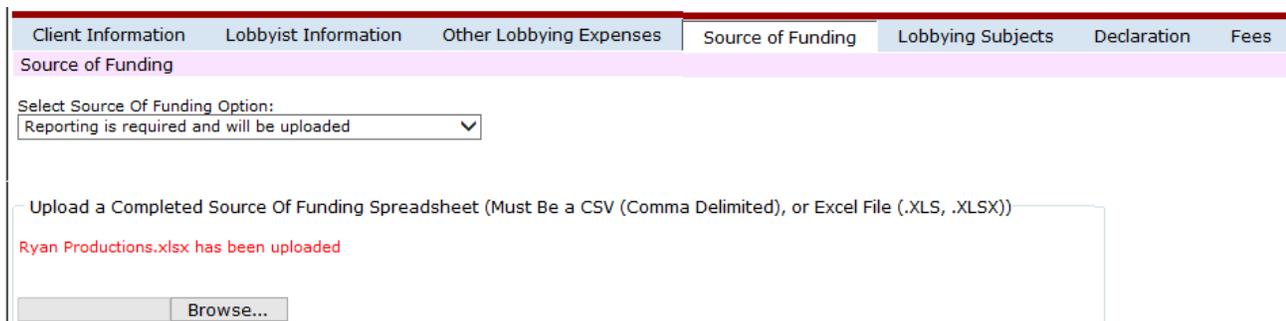
Select **Browse**. Locate Source of Funding Disclosure Spreadsheet and select **Open**.

The screenshot shows the "Source of Funding" tab selected. Below the tab, the text "Select Source Of Funding Option:" is followed by a dropdown menu where "Reporting is required and will be uploaded" is selected. Below this, there is a text box with the instruction "Upload a Completed Source Of Funding Spreadsheet (Must Be a CSV (Comma Delimited), or Excel File (.XLS, .XLSX))" and a "Browse..." button.

### Select Upload File.



You will see a message in red notifying you that the Source of Funding Disclosure Spreadsheet was uploaded.



Complete the remainder of the Client Semi-Annual Report form, including a payment option, and then submit the filing.

Your Client Semi-Annual Report will not appear in the [Main Menu](#) view until the Source of Funding Excel Spreadsheet has been electronically reviewed for processing. If the spreadsheet cannot be processed, a system-generated e-mail will be sent to the user describing the error(s). These errors must be resolved prior to resubmitting the Client Semi-Annual Report.

The rejected SoF spreadsheet will display in the [Main Menu](#) view. The user can upload the revised spreadsheet by selecting **Re-Submit SOF**, which will automatically direct you to the portion on the form where the revised Excel Spreadsheet can be uploaded. When the resubmitted Source of Funding spreadsheet is accepted by the system, the initial submission date is recognized as the submission date. The report will then be pending as not yet approved.

2014	January - June	SOF Rejected	Re-Submit SOF Vie...
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NOTE: While the Client Semi-Annual Report is not “rejected” in total, in order to correct the errors in the SoF Excel Spreadsheet, the Client Semi-Annual Report must ‘technically’ be resubmitted with the revised Excel Spreadsheet.

After selecting the **Re-Submit SOF** link, select **Browse**, re-upload Source of Funding Excel Spreadsheet and select **Submit Form**.

The screenshot shows the user interface of the New York State Joint Commission on Public Ethics Lobbying Online Filing System. At the top left is the logo for the Joint Commission on Public Ethics, with the text "NEW YORK STATE JOINT COMMISSION ON PUBLIC ETHICS LOBBYING ONLINE FILING SYSTEM". To the right of the logo is a navigation menu with links for "Main Menu", "Manage Profile", "Termination", and "Help". Below the navigation menu is a horizontal bar with a red link for "Change Password | Logout". The main content area contains a heading: "Use the form below to upload your revised Source Of Funding Spreadsheet for Semi-Annual Report Number 62822". Below this heading is a text input field with the placeholder text "Upload a Completed Source Of Funding Spreadsheet (Must Be a CSV (Comma Delimited), or Excel File (.XLS, .XLSX))". To the right of the input field are two buttons: "Browse..." and "Submit File".

For more information, please see the [SoF Training Materials](#) or contact JCOPE at [jcope@jcope.ny.gov](mailto:jcope@jcope.ny.gov) or 518-408-3976.

# Additional Instructions for reporting a contribution

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## TYPE OF SOURCE COLUMN

### Single Source

A single source may make more than one contribution during the reporting period; list each such contribution separately using the same Source ID.

Example: If ExampleCorp is a single source with a Source ID of “1”, and contributes \$3,000 on February 1, 2015 and another \$3,000 on May 1, 2015, two contributions would be reported on the form, both with a Source ID of “1”.

### Multiple Source

When disclosing a **multiple source**, identify each entity or individual that is part of the multiple source with a Source ID number followed by a letter, e.g., “2A,” “2B,” “2C” in the Source ID Column. Thus, a multiple Source comprised of a parent company and a subsidiary company would be listed as “1A” and “1B.”

Example: If ParentCorp contributes \$7,000 on February 1, 2015, this source’s contribution would be listed as “2A”; if SubsidiaryCorp contributes \$7,000 on May 1, 2015, this source’s contribution would be listed as “2B.” Every contribution from the parent or subsidiary would have a Source ID of “2A” or “2B”, respectively.

### Affiliated Source

An **affiliated source** is a source that meets any of the following criteria:

- (1) The Client Filer makes decisions or establishes policy for the corporation, partnership, organization, or entity;
- (2) The corporation, partnership, organization, or entity makes decisions or establishes policy for the Client Filer;
- (3) The Client Filer has the authority to hire, appoint, discipline, discharge, demote, remove, or otherwise influence other persons who make decisions or establish policies for the corporation, partnership, organization, or entity;
- (4) The corporation, partnership, organization, or entity has the authority to hire, appoint, discipline, discharge, demote, remove, or otherwise influence other persons who make decisions or establish policies for the Client Filer; or
- (5) The Client Filer and the corporation, partnership, organization, or entity, share a majority of directors on their governing boards, or share a majority of executive management, or maintain banks accounts with shared signatories.

Note: When reporting an **affiliated source**, you must also report either: (1) the name, address and principal place of business of at least one natural person (such as an officer, director, partner or proprietor) who shares or exercises discretion or control over the activities of the corporation, partnership, organization, or entity; or (2) the sources of the funds contributed by the corporation, partnership, organization, or entity to the Client Filer. See 19 NYCRR Part 938.3(e)(iii).

Similar to reporting a multiple source, when disclosing an **affiliated source**, identify the entity making the Contribution to the Client Filer with a number followed by a letter, e.g., “3A”. The accompanying person (who exercises the requisite control) or accompanying sources of funding to the original contributor would have a source ID of “3B”, “3C”, and so forth.

Example (affiliated source – controlling person identified): If ExampleCorp, LLC meets the definition of an affiliated source, and contributes \$7,000 to the Client Filer on February 1, 2015, all contributions by ExampleCorp, LLC would have a Source ID of “3A”; if John Q. Public exercises control over ExampleCorp, LLC, his Source ID would be “3B”.

Note: when reporting a controlling person, the contribution amount for this controlling person is zero (0). See Amount of Contribution Column below.

Example (affiliated source – underlying sources of funding disclosed): If ExampleCorp, LLC meets the definition of an affiliated source, and contributes \$7,000 to the Client Filer on February 1, 2015, all contributions by ExampleCorp, LLC would have a Source ID of “4A”; if not disclosing a person who exercises control over ExampleCorp, LLC (like John Q. Public in the example above), the entities that provide funding to ExampleCorp, LLC should be listed with a Source ID of “4B”, “4C”, “4D”, and so on. Note: when reporting **such underlying sources the contribution amounts for these underlying sources should be zero (0)**.

## SOURCE COLUMNS

### Source Name (Entity) Column

If the source is an entity (not an individual), include the full corporate name of the entity. Please spell out terms such as “corporation” or “association” where the term is part of the entity’s name. If there are multiple sources, identify the relationship between the entities (such as affiliate, parent, or subsidiary) in this Column.

*Skip this column if the source is an individual.*

### Source Last Name (Person) Column

Identify the last name of the source if they are a person.

*Skip this column if the source is an entity.*

### Source First Name (Person) Column

Identify the first name of the source if they are a person.

*Skip this column if the source is an entity.*

## **Additional Instructions for completing the remaining columns**

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### **Address Column**

Insert the street address of the Source.

Where the contributor has a non-U.S. address and/or phone number, enter the entire address and phone number here and enter "N/A" in the City, State, ZIP Code, and Phone Columns.

### **City Column**

Insert the city where the source is located.

### **State Column**

Insert the official United States Postal Service two letter abbreviation of the State where the source is located.

### **ZIP Code Column**

Insert the five-digit ZIP Code where the source is located.

### **Phone Column**

Insert the 10-digit telephone number for the Source. Do not include dashes or other punctuation.

### **Date of Contribution Column**

Insert the date of each contribution from each source. The correct format is XX/XX/XXXX.

Reminder: each contribution from the same source should be listed separately.

### **Amount of Contribution Column**

Insert the dollar amount of each contribution from each source, denominated in U.S. dollars. Use numerals only, without any currency symbols.