



2019 Client Semi-Annual ('CSA') Reporting Period and Source of Funding ('SoF') Information

Information for *Clients* who have not yet logged-in to the new Lobbying Application

If you received an email notifying you that you have been listed on an Organization Profile as a Chief Administrative Officer ("CAO") or Delegated Administrator ("DA") in the new online Lobbying Application **and have not yet attempted** to access the new LA, please contact JCOPE.

If you need assistance with creating your NY.gov ID account and claiming your *Client* Organization Profile, please contact the JCOPE Helpdesk at 518-408-3976 or by email at helpdesk@jcope.ny.gov and a Helpdesk representative will assist you.

As in previous launches related to the new Lobbying Application, we anticipate a higher call volume, and as such, we encourage our Filers to contact JCOPE now with assistance on how to claim and update your Organization Profile to minimize unnecessary filing delays before the statutory due date.

Information for Contractual Clients who lobby on their own behalf (you do **NOT** utilize the services of any Retained Lobbyists)

If you are a Contractual Client who lobbies on your own behalf (you are the Principal Lobbyist, Contractual Client and Beneficial Client) and do not use a Retained Lobbyist, you are **NOT REQUIRED** to file a Client Semi-Annual Report ("CSA"). A system-generated CSA will be created for you; see information below.

DO NOT submit a CSA for the upcoming 2019 January/June reporting period if you **ONLY** lobby on your own behalf and do not utilize the services of a Retained Lobbyist.

Information regarding the system-generated CSA

- A system-generated CSA will automatically be created for you with information disclosed in applicable Filings submitted during the corresponding CSA Reporting Period.
- No filing fee is required for system-generated Client Semi-Annual Reports.

NOTE: This feature is not yet functional. We anticipate having the system-generated CSA functionality available in late August.

Additional Disclosure Requirements for Employed Principal Lobbyists

- Employed Principal Lobbyists are still required to complete a Source of Funding summary statement; and,
- If applicable, report any Reportable Business Relationships that have commenced or continued during the January/June Reporting period.

Refer to the *'Important Information for Employed Principal Lobbyists for the 2019 Client Semi-Annual ('CSA') Reporting Period'* document for more detailed information regarding additional disclosure requirements.

Information for Contractual Clients who lobby on their own behalf AND utilize the services of any Retained Lobbyists

If you are a Contractual Client who lobbies on your own behalf **AND** utilizes the services of any Retained Lobbyist(s), the following information pertains to you:

- Certain information disclosed in applicable Filings submitted during the corresponding CSA Reporting Period will automatically populate your CSA:
 - The name(s) of each Retained Principal Lobbyist who has listed you as a Contractual Client on a Statement of Registration;
 - The name of any Beneficial Client(s) reported by your Principal Lobbyist(s) on their Registration(s);
 - The Level of Government and Compensation Amount(s) paid to your *Employed Lobbyist(s)* reported in your Bi-monthly Reports; and,
 - RBR filing(s) previously submitted during the applicable Reporting Period.
- You are required to provide the Level of Government, Compensation Amount(s), and Reimbursed Expense amounts paid to each Retained Lobbyist.
- You are required to disclose any Reportable Business Relationships which have commenced during the applicable reporting period; or indicate you have no Reportable Business Relationships to disclose.

NOTE: If you already submitted the RBR Form as a Lobbyist (part of a Statement of Registration), you are not required to disclose the RBR again on the CSA. (**SEE** Reportable Business Relationship Instructions)

- Every Beneficial Client is required to either (1) disclose Source(s) of Funding (“SoF”); or (2) indicate that SoF disclosure is not required. The information will be appended to every

active CSA and Amended CSA submitted by the affiliated Contractual Client(s) during the specified Reporting Period. (**SEE** Source of Funding Instructions – Coming Soon)

NOTE: Contractual Clients and Beneficial Clients can be the same party/entity.

Information for Contractual Clients who ONLY utilize Retained Lobbyists

If you are a Contractual Client who **only** uses the services of a Retained Lobbyist, the following information pertains to you:

- Certain information disclosed in applicable Filings submitted during the corresponding CSA six-month Reporting Period will automatically populate your CSA:
 - The name(s) of each retained Principal Lobbyist who has listed you as a Contractual Client on a Statement of Registration;
 - The names of all Beneficial Client(s) reported by your Principal Lobbyist(s) on their Registration(s); and,
 - RBR filing(s) previously submitted during the applicable Reporting Period.
- You are required to provide the Level of Government, Compensation Amount(s), and Reimbursed Expense amounts paid to each Retained Lobbyist.
- You are required to disclose any **new** Reportable Business Relationships which have commenced during the applicable reporting period; or indicate you have no Reportable Business Relationships to disclose. (**SEE** Reportable Business Relationship Instructions)
- Every Beneficial Client is required to either (1) disclose Source(s) of Funding (“SoF”); or (2) indicate that SoF disclosure is not required. The information will be appended to every active CSA and Amended CSA submitted by the affiliated Contractual Client(s) during the specified Reporting Period. (**SEE** Source of Funding Instructions – Coming Soon)

NOTE: Contractual Clients and Beneficial Clients can be the same party/entity.

Entering Lobbying Activities (Focuses and Parties Lobbied)

For the 2019 Client Semi-Annual Reporting Period, the **actual** Lobbying Activities that occurred during the specific Reporting Period **must** be disclosed by identifying the Focus Type, the Focus (including the specific Bill, Resolution, Executive Order, etc.), the Identifying Number, if known, or Description of the Focus, the Type of Lobbying Communication, and the names of the Party(ies) Lobbied on the specific Focus. Proper disclosure of these Lobbying Activities necessitates a level of specificity that makes clear to the public exactly *what* and *who* is being lobbied.

NOTE: Prior to disclosing Lobbying Activities utilizing Option 1 or Option 2, refer to the **'How to Properly Disclose Lobbying Activities'** document for detailed instruction on how to disclose Lobbying Activities with the correct amount of specificity and formatting requirements.

Both of the following options are available to Filers:

➤ **Option 1 – RECOMMENDED Add Focuses reported by your Retained Lobbyists on their Bi-Monthly Reports (and applicable amendments)**

Lobbying Activities reported by your Retained Principal Lobbyist(s) on their Bi-Monthly Reports submitted during the applicable reporting period are available for you to add on the CSA.

This function allows you to seamlessly add all the Lobbying Activities [the Focus Type, the Focus (Identifying Number or Description), Type of Communication, and Party(ies) Lobbied] reported by your Lobbyist(s) on your CSA without having to manually enter the information.

NOTES:

- Lobbying Activity information is directly imported from the data disclosed in your Lobbyist's Bi-monthly Reports or Amended Bi-monthly Reports that cover the applicable reporting period **as of the submission date of the CSA**. For the January - June Client Semi-Annual Reporting period, data disclosed in the: January/February and March/April Bi-monthly Reports (and amendments) will be included.
- A specific Lobbying Activity populated to your CSA can be removed **after** it has been added. (**NOTE:** Removal of a Lobbying Activity on your CSA does not affect the information reported by your Principal Lobbyist's on their Bi-monthly Report(s).)
- The CSA requires disclosure of the **actual** Lobbying Activities that occurred during the specific Reporting Period. If your Retained Lobbyist submits a new and/or amends Lobbying Activity information **after it has been added to your CSA**, you are required to amend the associated CSA to reflect these changes since the Lobbying Activity information provided by the Lobbyist in their Bi-monthly Reports should match that disclosed in the CSA.

➤ **Option 2 – Add Focuses manually**

You must manually data-enter each Lobbying Activity by identifying the Focus Type, the Focus (including the specific Bill, Resolution, Executive Order, etc.), the Identifying Number, if known, or Description of the Focus, the Type of Lobbying Communication, and the names of the Party(ies) Lobbied on the specific Focus.

Resources available to you on launch day

1. Comprehensive written instructions on how to complete and file the 2019 January/June Client Semi-Annual Report and Source of Funding Disclosure form.
2. Instructions for Filers that utilize the pre-formatted Excel Spreadsheet to disclose Source of Funding Information.
3. Detailed step-by-step 'click here' instructions on how to file your Client Semi-Annual Report and Source of Funding Disclosure form in the new online Lobbying Application. These instructions include screen shots and are written in plain language. ("How-To" videos will be coming soon).
4. Information on how to properly disclose Lobbying Activities
5. PDF 'paper' forms for both the Client Semi-Annual Report and Source of Funding Disclosure Form.

Questions:

As always, if you have any questions about navigating the LA, please contact our **Lobbying Helpdesk** at **(518) 408-3976** or by emailing helpdesk@jcope.ny.gov. For any questions about what you need to include in your Filings, please contact our **Attorney of the Day** at **800-87-ETHICS (800-873-8442)**, and press '2' when prompted.