



New York State Joint Commission on Public Ethics

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Important Information for Employed Principal Lobbyists and Client Semi-Annual ('CSA') Reports

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

Pursuant to Commission Regulations, Contractual Clients who lobby on their own behalf (you are the Principal Lobbyist, Contractual Client, and Beneficial Client) are **NOT REQUIRED** to file a Client Semi-Annual Report ("CSA"). Instead, a system-generated CSA will be created for you. You are, however, still required to either (1) disclose Source(s) of Funding (SoF) or (2) indicate SoF reporting is not required.

The Commission is set to launch the system-generated CSA Report feature in the NEW Lobbying Application ('LA') December 19, 2019.

Information regarding the system-generated CSA:

- The system-generated CSA is automatically created in the LA upon submission of your Source of Funding ("SoF") disclosure.
 - A system-generated CSA will be automatically created for those Filers who submitted their SoF for the 2019 January/June reporting period.
- The system-generated CSA information is directly imported from the data disclosed in your Lobbyist Bi-monthly Reports or amended Bi-monthly Reports that cover the applicable reporting period.
 - EXAMPLE: For the January/June Client Semi-Annual reporting period, data disclosed in the: January/February, March/April and May/June Bi-monthly Reports (and amendments) will be imported into the system-generated CSA.
- Submission of 'new' and/or amended Bi-monthly Reports will update the corresponding system-generated CSA so it will always contain the most up-to-date information.
- Submission of an amended Source of Funding Report will also update the corresponding system-generated CSA.
- No filing fee is required for system-generated Client Semi-Annual Reports.

- A system-generated CSA can only be amended to add Retained Lobbyist information. Otherwise, you must amend your Bi-monthly Report(s) if you wish to reflect any changes to the system-generated CSA.
 - **NOTE:** If you are amending a system-generated CSA to add Retained Lobbyist Information - you will be required to pay the \$50 filing fee and file CSAs going forward if you continue to use Retained Lobbyists.
- The following statement will appear on every system-generated CSA:

“THIS FILING WAS AUTOMATICALLY GENERATED USING INFORMATION REPORTED BY THE CONTRACTUAL CLIENT IN THEIR BI-MONTHLY REPORTS COVERING ACTIVITY ENGAGED IN DURING THE APPLICABLE CLIENT SEMI-ANNUAL PERIOD.”

PLEASE NOTE:

- Any new and/or amended Bi-monthly Reports will generate changes (amendments) to the corresponding system-generated CSA.
- The LA will **not** create a system-generated CSA if, as an Employed Principal Lobbyist, you submitted a January/June Client Semi-Annual Report. Likewise, if the January/June CSA has already been submitted, the report will not auto-generate an amendment. **Any changes to this report will require the Filer to submit an amendment to the CSA.**

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 Client Semi-Annual reporting period.

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.

ALSO SEE the 2019 Client Semi-Annual and Client Semi-Annual Amendment Information Document (Revised December 2019) for more information