



HOW TO PROPERLY DISCLOSE LOBBYING ACTIVITIES

A resource for Principal Lobbyists, Contractual Clients and Public Corporations

Lobbying Activities are required to be disclosed when activity included in Section 1-c(c) of the Lobbying Act is met. Lobbying Activities include the **Focus Type** (State and/or Municipal Bill, Rule, Regulation, Procurement Contract, Executive Order, etc.), 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** (Direct, Grassroots or Both), 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.

JCOPE has created the following guidelines to assist you in ensuring your Lobbying Activity information is correctly disclosed with the required specificity. JCOPE recommends you review these guidelines and the information disclosed in any previously submitted Report(s) (including Lobbyist, Client, Public Corporation and Disbursement of Public Monies filings) to ensure your Lobbying Activities have been properly disclosed and sufficiently identified. Upon review, if information has not been correctly disclosed with sufficient specificity, an amended Report should be submitted.

HOW TO DISCLOSE LOBBYING FOCUSES

How to disclose Known Focus Numbers

An **Identifying Focus Number** (such as a State and/or Municipal Bill, Rule, Regulation, Procurement Contract, Executive Order number, etc.) must be disclosed.

On the '**Lobbying Activities**' tab of your Filing:

1. Select '**Update**' in the '**Focuses**' box
2. Under '**Add Lobbying Focuses**', select the '**Focus Type**' and '**Communication Type**' from the drop-down list
3. Type *the number of the Senate and/or Assembly Bill, Chapter Law or Procurement Contract* in the '**Focus #**' box
 - Please see examples below of the correct format to use when data-entering each *Senate* and/or *Assembly Bill, Chapter Law or Procurement Contract* number
4. Select the **Enter** key on your keyboard to add this information under the '**My Selected Focuses**' section
 - If needed, you may change the '**Communication Type**' in this section
5. When finished adding Focuses, select the '**Close**' button

How to disclose multiple Known Focus Numbers

On the 'Lobbying Activities' tab of your Filing:

1. Select 'Update' in the 'Focuses' box
2. Under 'Add Lobbying Focuses', select the 'Focus Type' from the drop-down list
3. Select the green 'Load Multiple' button
4. Type (or copy/paste) *the number* of each Senate and/or Assembly Bill, Chapter Law or Procurement Contract in the corresponding 'Communication Type' box
 - Each number must be separated by a comma. *Example:* A1234,S5678
5. When finished adding multiple numbers, select the green 'Process' button
6. When finished adding Focuses, select the 'Close' button

Examples:

1. **Identify Senate and Assembly Bills** by entering a **capital 'S'** for a Senate Bill number, or a **capital 'A'** for an Assembly Bill number. *Do not add a space, hyphen, period, or other character between the capital letter and the bill number.*
 - **Correct:** A1234
 - **Incorrect:** a1234; or a 1234; or A 1234; or A_1234
2. **Identify Amended Senate and Assembly Bills** by denoting the corresponding letter suffix (A, B, C, D and so on). Amended State bills are altered to add a letter suffix each time the bill is amended. Please ensure the letter at the end of the amended Bill number includes a dash before it.
 - **Correct:** A1345-A
 - **Incorrect:** a1234A; or a 1234a; or A 1234a; or A_1234A
3. **Identify a Chapter Law** by providing the complete title.
 - **Correct:** Chapter 16 of the laws of 1971
 - **Incorrect:** Chapter 16; or Laws of 1971
4. **Identify a Procurement Contract** by identifying the number.
 - **Correct:** OER01-C11006MWBE-1120000

How to disclose Unknown Identifying Focus Numbers

If an **Identifying Focus Number** (such as a State and/or Municipal Bill, Rule, Regulation, Procurement Contract, Executive Order number, etc.) is *not known*, you must provide a **Description of the Focus** which clearly communicates the focus of the lobbying effort.

On the 'Lobbying Activities' tab of your Filing:

1. Select 'Update' in the 'Focuses' box
 2. Select the 'Focus Type' from the drop-down list
 3. Click the 'Add description if identifying number is unknown' hyperlink
 4. Select the 'Communication Type' from the drop-down list
 5. Type the description of the *Senate and/or Assembly Bill, Chapter Law or Procurement Contract* in the 'Description' box; then click the 'Add' button
 6. When finished adding Focuses, select the 'Close' button
- ! Please see examples below of the correct format to use when data-entering each *Senate and/or Assembly Bill, Chapter Law or Procurement Contract* description

Examples:

1. **Identify State Level Focuses** by providing a clear description of the focus of the lobbying effort (who and what is impacted).
 - **Correct:** Transportation Regulations that Impact Farmers Transporting Fresh Produce
 - **Incorrect:** Transportation; or Transportation Regulations
2. **Identify Municipal Level Focuses** by providing a clear description of the focus and the specific municipality the Lobbying Activity is intended to impact.
 - **Correct:** Municipal Bill regarding single stream recycling in the Town of Bethlehem, New York.
 - **Incorrect:** Single stream recycling

See 'How to File a Bi-monthly Report and Amendment in LA' OR 'How to File a CSA and CSA Amendment' for detailed information

HOW TO DISCLOSE PARTY(IES) LOBBIED

The direct connection (one-to-one relationship) between the Focus and the target(s) (referred to as 'Parties Lobbied') of any reportable "Lobbying Activity" must be identified.

State Legislature, Committees, and staff

A communication sent to **the entire** Legislature (every member of the Senate and Assembly) regarding a specific Focus can be disclosed in the 'Party' field (so you do not have to select every Senator/Assembly person) by selecting one of the following three choices:

- A communication sent to entire Senate
- A communication sent to entire Assembly

- A communication sent to entire Legislature (includes all members of the Senate *and* Assembly)

If you directly lobbied a Senator and/or Assembly person, or a staff member, you must identify them using the drop-down list as described below. For your convenience, every State Legislator's name is included in the 'Party Name' field for selection, including the ability to select "staff member" of such State Legislator. (See below)

To identify Senate and Assembly members or their staff members

On the 'Lobbying Activities' tab, 'Parties Lobbied' section of your Filing:

1. Type the first few characters of the Legislator's last name in the 'Party' field; OR
2. Type the asterisk symbol (*) in the 'Party' field to view JCOPE's comprehensive list of Legislators

Once you start typing the first few characters, the Legislator's name and the '[Legislator's name], staff member' will appear in the drop-down list for your selection.

Example A: If you lobbied Assemblyman Doug Smith, or a staff member of Assemblyman Doug Smith:

1. Select 'Update' in the 'Parties Lobbied' box
2. Type *Smith* in the 'Party' field
3. Select the applicable choice from the drop-down list: 'Doug Smith' **OR** 'Doug Smith, staff member'

! Please contact JCOPE if a Legislator's name is missing from the list.

IMPORTANT:

! DO NOT use the '[Click here to add Party Name if not found](#)' hyperlink to add the name of a Senate or Assembly member, or staff person of such Senate or Assembly member.

! If you do not identify detailed information as specified in this document, a Ticket will be created and JCOPE will request you amend your Filing.

To identify a Legislative Committee or staff member of such a Committee

Example A: If you lobbied every member of a Senate or Assembly Committee (the entire Committee):

1. Select 'Update' in the 'Parties Lobbied' box
2. Type the first few characters of the Committee name in the 'Party' field
3. Select the applicable Senate or Assembly Committee name from the drop-down list; *i.e.* Aging (Senate Committee) **OR** Aging (Assembly Committee); then click the 'Add' button.
4. When finished adding Parties, select the 'Close' button

! Please contact JCOPE if a Committee's name is missing from the list

Example B: If you lobbied a specific staff member of a Senate and/or Assembly Committee:

1. Select **'Update'** in the **'Parties Lobbied'** box
2. Select **'Click here to add Party Name if not found'** hyperlink
3. Select the applicable Committee choice from the **'Government Body'** drop-down list: **'Senate Committee'** **OR** **'Assembly Committee'**
4. Type **XXX name** (Senate or Assembly Committee name), **staff member** in the **'Party'** field; **OR** **XXX name** (Senate or Assembly Committee name), **Jane Doe** in the **'Party Name'** field
 - **Task Force on Lyme and Tick-Borne Diseases, staff member; or**
 - **Task Force on Lyme and Tick-Borne Diseases, John Doe**

Governor, Lieutenant Governor, and staff

If you directly lobbied the Governor, Lieutenant Governor and/or a member of their staff, you must identify them using the drop-down list as described below. For your convenience, the Governor and Lt. Governor's names are included in the **'Party Name'** field for selection, including the ability to select "staff member". (See below)

Example A: If you lobbied Governor Andrew Cuomo:

1. Select **'Update'** in the **'Parties Lobbied'** box
2. Type **Governor** in the **'Party'** field
3. Select **'Governor Andrew Cuomo'** from the drop-down list

Example B: If you lobbied Lieutenant Governor Kathy Hochul:

1. Select **'Update'** in the **'Parties Lobbied'** box
2. Type **Lt. Governor** in the **'Party'** field
3. Select **'Lt. Governor Kathy Hochul'** from the drop-down list

Example C: If you lobbied a staff member of the Governor and/or Lieutenant Governor:

1. Select **'Update'** in the **'Parties Lobbied'** box
2. Type **Executive** in the **'Party'** field
3. Select **'Executive Chamber/Staff of Office of the Governor and Lt. Governor'** from the drop-down list

State Agencies

If you directly lobbied a Commissioner and/or staff member of a State Agency, you must identify them by using the drop-down list as described below.

Example A: If you lobbied the Commissioner of Taxation and Finance:

1. Select **'Update'** in the **'Parties Lobbied'** box
2. Select **'Click here to add Party Name if not found'** hyperlink

3. Select 'State Agency' from the 'Government Body' drop-down list
4. Type 'Taxation and Finance, Commissioner' in the 'Party Name' field; **OR** 'Taxation and Finance, Commissioner Jane Doe' in the 'Party Name' field

Example B: **If you lobbied a staff member in a specific unit/division/department of the Office of Real Property Tax Services:**

1. Select 'Update' in the 'Parties Lobbied' box
2. Select the 'Click here to add Party Name if not found' hyperlink
3. Select 'State Agency' from the 'Government Body' drop-down list
4. Type 'Office of Real Property Tax Services, XXX (specify unit/division/department within the agency the staff member represents), *staff member*' in the 'Party Name' field; **OR**
5. 'Office of Real Property Tax Services, XXX (specify unit/division/department within the agency the staff member represents), *Jane Doe*' in the 'Party Name' field
 - *Office of Real Property Tax Services, General Counsel's Office, staff member; or*
 - *Office of Real Property Tax Services, General Counsel's Office, Janet Doe.*

Municipal Agencies:

If you directly lobbied a Mayor, Town Supervisor, etc., and/or staff member of a Municipality, you must identify them by using the drop-down list as described below.

Example A: **If you lobbied the Mayor of the City of Albany:**

1. Select 'Update' in the 'Parties Lobbied' box
2. Select 'Click here to add Party Name if not found' hyperlink
3. Select 'City' from the 'Government Body' drop-down list
4. Type 'City of Albany, Mayor' in the 'Party Name' field; **OR** 'City of Albany, Mayor Jane Doe' in the 'Party Name' field

Example B: **If you lobbied a staff member of a specific unit/division/department within the City of Albany:**

1. Select 'Update' in the 'Parties Lobbied' box
2. Select 'Click here to add Party Name if not found' hyperlink
3. Select 'City' from the 'Government Body' drop-down list
4. Type 'City of Albany, XXX (specify unit/division/department within the City the staff member represents), *staff member*' in the 'Party Name' field; **OR**
5. 'City of Albany, XXX (specify unit/division/department within the City the staff member represents), *Jane Doe*' in the 'Party Name' field
 - *City of Albany, Event Permits, staff member; or*
 - *City of Albany, Event Permits, Janet Doe*

Disclosing State and Municipal Level Parties Lobbied for the SAME Focus

You do not need to list a Focus more than once to show that you lobbied multiple Parties (Municipal and/or State) for that specific Focus. A combination of State and Municipal Level parties may be included on any State or Municipal level Focus (Bill, Resolution, Procurement, etc.).

1. Identify the Focus Number or Description

The identifying Focus number (such as a State and/or Municipal Bill, Rule, Regulation or Rate or Procurement Contract, Executive Order number, etc.) must be disclosed. If a Focus Number (identifying number) is **unknown**, a description of the Focus must be disclosed. The description must clearly communicate the Focus of the lobbying effort.

2. Identify the Party(ies) you directly lobbied

For your convenience, every State Legislator's name is included in the 'Party Name' field.

Example: If you performed Lobbying Activities on **both** a State and Municipal level on a Municipal Bill regarding single stream recycling in the Town of Bethlehem, New York, you would disclose the Focus **ONCE**, and disclose all the Parties lobbied for that Focus.

Please see [EXAMPLES](#) above for 'how' to properly disclose Focuses and Parties.

1. **Focus Type** = Municipal Bill
2. **Focus Number or Description** = Single stream recycling in the Town of Bethlehem, New York
3. **Parties Lobbied** = Town of Bethlehem, Supervisor; Assemblyman John Doe; Senator Jane Smith; City of Albany, Mayor

Other Best Practices:

Do not abbreviate Lobbying Activity information

- **Correct:** Brooklyn Community Board 4
- **Incorrect:** Brooklyn CB4

Always include the full State Agency Name

- **Correct:** NYS Office of General Services
- **Incorrect:** OGS

QUESTIONS?

Contact the JCOPE Helpdesk at helpdesk@jcope.ny.gov or by phone at 518-474-3973 for technical assistance on how to either disclose a Lobbying Activity or amend your filing in the JCOPE Lobbying Application.

To speak to the JCOPE Attorney of the Day for guidance on whether a specific lobbying activity needs to be disclosed on a filing email them at legal@jcope.ny.gov or call the JCOPE Hotline at phone at 1-800-87-ETHICS (873-8442) and press '2'.