

## **Proposed Revision**

### 943.5 Lobbying Activities – General Provisions and Restrictions.

#### (b) Online Ethics Training

(1) All [~~registered~~] Individual Lobbyists listed on a Statement of Registration must complete an online ethics training, as provided by the Commission

#### **(1) Kasirer Recommendations**

- We would like clarification of the language. If this is enacted, are all lobbyists on a statement of registration required to do the training within a certain period of time? If so, we recommend clarifying the definition of "Individual lobbyist."
  - Individual lobbyists are defined in the law as "retained, designated, or employed," it is unclear if one representative from a retained firm or each lobbyist within a retained firm must complete the training, which is why we are requesting a clarification.
- We would also like clarification on the type of training ie. digital, group session, in-person etc.

## **Proposed Revision**

### 943.10 Lobbyist Statement of Registration

(d) Once a Lobbyist meets or anticipates meeting the cumulative \$5,000 threshold, a Lobbyist must file a Statement of Registration for every Client for whom the Lobbyist lobbies, regardless of Compensation or Expenses paid by each Client individually.

(1) A Statement of Registration must be filed for each Lobbyist/Client relationship emanating from the same lobbying agreement or authorization to lobby for the same purpose.

### 943.10 Lobbyist Statement of Registration

(2) If, after Termination, a new Lobbying Agreement is executed during the biennial period, a new Statement of Registration must be submitted with the applicable filing fee.

## **(2) Kasirer Recommendations**

- We recommend neither of the above recommended changes be added to the regulations.
- We believe the added burden of multiple registrations, client reports, and fees will deter clients from re-engaging, directly slowing businesses.
- We believe multiple registrations for a single client is a complicated way to present public filings and discourages transparency.

## **Proposed Revision**

### 943.10 Lobbyist Statement of Registration

(2) Un-Executed Lobbying Agreement Form. A lobbyist who is prepared to register, but is awaiting the return of an executed lobbying agreement back from a Client may avoid the statutory late fees, provided the following criteria are met:

(i) A Statement of Registration is otherwise filed completely and timely with: (a) a copy of the un-executed Agreement that was provided to the Client for signature; and (b) a completed Un-Executed Lobbying Agreement form, as provided by the Commission;

(ii) No lobbying occurs and no compensation is received or billed until the executed Agreement is provided to the Commission; and

(iii) The executed Agreement is provided within 30 days of the original submission of the Statement of Registration.

(a) An amended Statement of Registration must be submitted within 10 days of the date the Agreement is executed.

## **(3) Kasirer Recommendations**

- We recommend including this option *in addition to* submitting extension requests. We also recommend adding language regarding the extension request tab and the process for extension to this section.
- The above is an administrative burden. JCOPE should give both options, not replace extension requests, and we would like that clarified.

## **Proposed Revision**

### 943.3 Definitions

(f) Contractual Client means an individual or organization that retains the services of a Lobbyist for the benefit of itself or another.

(1) A Contractual Client is the individual or organization that signs and/or enters into a lobbying agreement with a Lobbyist;

(2) Compensation and Expenses are typically, but not necessarily, paid for or incurred by the Contractual Client.

#### **(4) Kasirer Recommendations**

- We recommend adding the below provision for clarity (under Section (f)(2) above)
- An entity other than the Contractual Client, such as, but not limited to a third party or related entity may pay for or incur the Compensation and Expenses.