



NEW YORK STATE JOINT COMMISSION ON PUBLIC ETHICS

540 Broadway * Albany, New York 12207

(P) 518.408.3976 * (F) 518.474.6216 * (Email) CSA@jcope.ny.gov

CLIENT SEMI-ANNUAL COURTESY REMINDER

The following reports are due by July 15, 2021:

- 2021 January/June Client Semi-Annual Reports ('CSA')
- 2021 Source of Funding ('SoF') information
- 2021 Reportable Business Relationship ('RBR') disclosure requirements

NEW FOR 2021 – 2022

- **Enhancements to the Lobbying Activities section** – Significant efforts have been made to streamline lobbying activity disclosures and increase transparency to the public by enhancing how Filers enter information related to Parties Lobbied. We have expanded the LA Parties Lobbied database and streamlined the process to help Filers identify government entities and include additional information related to existing parties. Filers no longer have the option to manually enter their own Party Name. (Refer to the '**How to Properly File Lobbying Activities 2021 Edition**' for detailed information on how to disclose Lobbying Activities).
- **Reportable Business Relationship ("RBR")** - If applicable, every Beneficial Client is responsible to submit a RBR Report. This filing will be appended to the Contractual Client's CSA in the Beneficial Client(s) SoF & RBR tab.
- **Changes to Coalition Member Reporting** – New rules regarding reporting of Coalition lobbying activity are in effect for the 2021 Biennial. Depending on the nature of the Coalition, either it must report as a Coalition, or its members must report Coalition activity on their own filings.
 - Coalitions that meet certain criteria (**Structured Coalitions**) must file lobbying reports as a Coalition. Such Coalitions are not required to disclose Coalition Members as Beneficial Clients on their Filings.
 - Reporting related to Coalitions that do not meet certain criteria (**Unstructured Coalitions**) must be handled by Coalition Members. In addition to disclosing the Coalition

Name and Contribution amounts, Members must disclose information related to expenses incurred on behalf of the Coalition.

- **For additional information** on these changes please see the guidance document entitled **'2021- 2022 Coalition Filing Requirements'** to determine if you meet the criteria of either a 'Structured' or 'Unstructured' Coalition.
- **Changes for Entering Itemized Expense Purposes** – A more comprehensive selection of Expense Purposes has been added to the drop-down menu relating to Itemized Expenses. Therefore, Filers may no longer manually enter their own Expense Purposes.
- **Information for Paper Filers** – Due to enhancements and changes to our existing reporting requirements, new Client Semi-Annual writable PDF forms are available on the JCOPE website.

2021 FILING REQUIREMENTS –Client Semi-Annual Reports

The Lobbying Act requires that any Contractual Client retaining, employing or designating a Lobbyist(s) - whether or not any such Lobbyist was required to file a Statement of Registration or Bi-monthly Report – who reasonably anticipates that during the year an amount in excess of \$5,000 in combined Reportable Compensation and Reportable Expenses for Lobbying will be expended or incurred, is required to submit a Client Semi-Annual Report ('CSA').

The CSA is due by the 15th day of the month following the end of the relevant reporting period. The two reporting periods are (i) January through June (due July 15th); and (ii) July through December (due January 15th). In the event that July 15th or January 15th falls on a weekend or holiday, the due date will be the following business day.

If the \$5,000 threshold is exceeded during the January through June reporting period, **both** the January/June **and** July/December CSAs are required to be filed even if there are no further lobbying expenditures during the second reporting period. However, if the Lobbyist and Client relationship terminates on or before June 30th of the calendar year, the Client is **not** required to file the July/December CSA.

If a January/June CSA is filed, but by the end of the calendar year, the \$5,000 threshold has still not been exceeded, a July/December CSA Report is not required to be filed.

A \$50 non-refundable Client Semi-Annual Report filing fee (payable in U.S. dollars) is required to be submitted with each Report. No additional filing fee is required for amended Client Semi-Annual Reports, provided an original is on file for that period.

Any filing fees paid by check must be paid separately from other filings; *i.e.*, one check *per* filing, made payable to the New York State Joint Commission on Public Ethics. The Commission will return any check that includes filing fees for more than one report. To facilitate processing and approval time, the online confirmation number must be written on the check. A fee may be charged for a returned check. Filing fees may be paid online with Visa, MasterCard, American Express or Discover, provided you file electronically.

EXCEPTIONS TO THE CLIENT SEMI-ANNUAL FILING REQUIREMENT

DO NOT submit a CSA if you ONLY lobby on your own behalf and do not utilize the services of a Retained Lobbyist.

- If you are a Contractual Client who lobbies on your own behalf (i.e. you are the Principal Lobbyist, Contractual Client and Beneficial Client) **AND** do not use a Retained Lobbyist, you are **NOT REQUIRED** to complete a Client Semi-Annual Report (“CSA”). HOWEVER, a **Source of Funding (SoF) Disclosure is still required.** (*SEE SoF Instructions for more information*)

NOTE: A system-generated CSA will be created for you.

Please be aware, you (as a Beneficial Client) **are still required** to complete a Source of Funding (“SoF”) summary statement. Every Contractual Client who lobbies on their own behalf and **any** Beneficial Client is required to either (1) disclose Source(s) of Funding or (2) indicate SoF reporting is not required.

If applicable, you must also report any Reportable Business Relationships that have commenced or continued during the January/June Reporting period. RBR filing(s) previously submitted during the applicable Reporting Period are appended to system-generated CSA Reports.

Information regarding the system-generated CSA:

- If applicable, a system-generated CSA will automatically be created for you from information disclosed in applicable Bi-monthly Reports submitted during the corresponding CSA reporting period (the Statement of Registration, Bi-monthly Reports and any applicable amendments) upon submission of your Source of Funding disclosure.
 - **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 (used) to populate the system-generated CSA.
- No filing fee is required for system-generated Client Semi-Annual Reports.
- System-generated CSAs can only be amended to add Retained Lobbyist information. To change any other information (which is directly imported from your Bi-monthly Reports), you must amend the applicable Bi-monthly Report(s).

NOTE: If you are amending a system-generated CSA to add Retained Lobbyist Information, you will be required to pay the \$50 filing fee. (CSAs are required by any Contractual Client who retains any Principal Lobbyist and meets the reporting threshold.)

- **NOTE:** Once a system-generated CSA is amended to add Retained Lobbyist information, LA will **not** automatically amend the system-generated CSA to reflect changes made to any of the corresponding Bi-monthly Reports. When you select the ‘Edit’ button to amend your CSA, LA will automatically update the CSA with the amended/changed Bi-monthly information, but you must then submit the amended CSA for the changes to be saved.
- The following statement appears 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.”

Public Corporations:

Public Corporations who only employ Lobbyists (requiring the Public Corporation to submit a Registration and Bi-monthly Reports) are not required to file CSAs. However, if the Public Corporation retains a Principal Lobbyist (and is thereby considered a Contractual Client), a CSA may be required.

RESOURCES AVAILABLE TO YOU

The most up-to-date information for the 2021-2022 Biennial Period can be found at the '[2021-22 Lobbying Biennial Period Information](#)' section of the JCOPE website. Information includes:

- [How to Properly Disclose Lobbying Activities](#) (2021 Edition)
- [2021-2022 Coalition Filing Requirements](#) (*revised June 2021*)
- [2021-2022 Client Semi-Annual Filing Instructions](#) (*revised June 2021*)
- [2021-2022 Source of Funding Filing Instructions](#) (*revised June 2021*)
- New Client Semi-Annual PDF form for 'paper filers' (*revised July 2021*)

GENERAL FILING INFORMATION

We encourage all Filings to be submitted through the Lobbying Application ("LA").

Timely reports are those that are received in the Commission's office on or before the due date. The Commission does not consider the submission date, postmarked date or declaration signature date as the date of receipt. Paper reports (PDFs) must be submitted with original signatures; photocopies and faxes will not be accepted.

CONTACT US

If you have any questions about navigating the LA or for technical assistance, please contact the JCOPE Helpdesk at helpdesk@jcope.ny.gov or by phone at 518-474-3973.

For questions related to the:

- Lobbyist Statement of Registration – email us at registrations@jcope.ny.gov
- Bi-monthly and Disbursement of Public Monies Reports – email us at bimonthlies@jcope.ny.gov
- Client Semi-Annual Report and Source of Funding – email us at CSA@jcope.ny.gov
- Reportable Business Relationship Report – email us at discrepancies@jcope.ny.gov

To speak to the JCOPE Attorney of the Day, email them at legal@jcope.ny.gov or call the JCOPE Hotline at phone at 1-800-87-ETHICS (873-8442) and press '2'.

PLEASE NOTE: We anticipate experiencing a larger than normal call volume due to enhancements in the Lobbying Application. **The preferred method of contact is via the email addresses listed above.** Emails are responded to in the order they are received. We appreciate your patience during this busy filing period.