

GAO Highlights

Highlights of [GAO-19-357](#), a report to congressional committees

Why GAO Did This Study

The LDA, as amended, requires lobbyists to file quarterly disclosure reports and semiannual reports on certain political contributions. The law also includes a provision for GAO to annually audit lobbyists' compliance with the LDA. GAO's objectives were to (1) determine the extent to which lobbyists can demonstrate compliance with disclosure requirements; (2) identify any challenges or potential improvements to compliance that lobbyists report; and (3) describe the resources and authorities available to USAO in its role in enforcing LDA compliance. This is GAO's 12th annual report under the provision.

GAO reviewed a stratified random sample of 99 quarterly disclosure LD-2 reports filed for the third and fourth quarters of calendar year 2017, and the first and second quarters of calendar year 2018. GAO also reviewed two random samples totaling 160 LD-203 reports from year-end 2017 and midyear 2018. This methodology allowed GAO to generalize to the population of 49,918 disclosure reports with \$5,000 or more in lobbying activity, and 29,798 reports of federal political campaign contributions. GAO also interviewed USAO officials.

GAO is not making any recommendations in this report. GAO provided a draft of this report to the Department of Justice for review and comment. The agency stated that it did not have comments.

View [GAO-19-357](#). For more information, contact Yvonne D. Jones, at (202) 512-2717 or jonesy@gao.gov.

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2018 LOBBYING DISCLOSURE

Observations on Lobbyists' Compliance with Disclosure Requirements

What GAO Found

For the 2018 reporting period, most lobbyists provided documentation for key elements of their disclosure reports to demonstrate compliance with the Lobbying Disclosure Act of 1995, as amended (LDA). For lobbying disclosure (LD-2) reports and political contributions (LD-203) reports filed during the third and fourth quarter of 2017 and the first and second quarter of 2018, GAO estimates that

- 92 percent of lobbyists who filed new registrations also filed LD-2 reports as required for the quarter in which they first registered (the figure below describes the filing process and enforcement);
- 97 percent of all lobbyists who filed could provide documentation for lobbying income and expenses. However, an estimated 20 percent of these LD-2 reports were not properly rounded to the nearest \$10,000;
- 19 percent of all LD-2 reports did not properly disclose one or more previously held covered positions as required; and
- 33 percent of LD-203 reports were missing reportable contributions, which was a statistically significant increase compared to prior years.

Except as noted above, these findings are generally consistent with prior reports GAO issued from 2010 through 2017.

Disclosure Process for Lobbying Firms



Sources: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. | GAO-19-357

GAO continues to find that most lobbyists in the sample reported some level of ease in complying with disclosure requirements and in understanding the definitions of terms used in the reporting. However, some disclosure reports demonstrate compliance difficulties, such as failure to disclose covered positions or misreporting of income or expenses.

The U.S. Attorney's Office for the District of Columbia (USAO) stated it has sufficient resources to enforce compliance. USAO continued its efforts to resolve noncompliance through filing reports or terminating registrations, as well as imposing civil and criminal penalties.