United States Government Accountability Office

Report to Congressional Committees

March 2019

2018 LOBBYING DISCLOSURE

Observations on Lobbyists' Compliance with Disclosure Requirements

Accessible Version

GAO-19-357

GAO Highlights

Highlights of GAO-19-357, a report to congressional committees

March 2019

2018 LOBBYING DISCLOSURE

Observations on Lobbyists' Compliance with Disclosure Requirements

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.

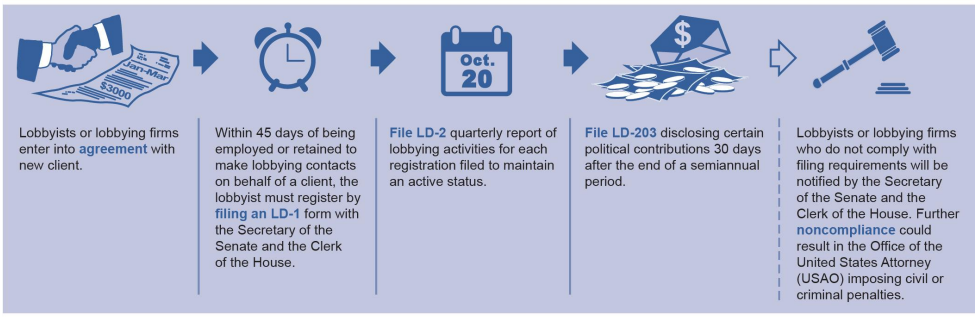
What GAO Found

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.

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Abbreviations

Clerk of the House	Clerk of the House of Representatives
FEC	Federal Election Commission
HLOGA	Honest Leadership and Open Government Act of 2007
LDA	Lobbying Disclosure Act of 1995
USAO	U.S. Attorney's Office for the District of Columbia

SAUSA	Special Assistant United States Attorneys

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
Washington, DC 20548

March 29, 2019

Congressional Committees

Questions regarding the influence of special interests in the formation of government policy have led to efforts to achieve more transparency and accountability from the lobbying community. The Honest Leadership and Open Government Act of 2007 (HLOGA) amended the Lobbying Disclosure Act of 1995 to require lobbyists to file quarterly lobbying disclosure reports and semiannual reports on certain political contributions.[1] HLGOA also increased civil penalties and added criminal penalties for failure to comply with lobbying disclosure requirements. In addition, HLOGA includes a provision for us to annually audit the extent of lobbyists' compliance with the Lobbying Disclosure Act of 1995, as amended (LDA) by reviewing publicly available lobbying registrations and other matters.[2] This is our 12th report under this provision.[3]

Consistent with our prior reports, our objectives were to (1) determine the extent to which lobbyists can demonstrate compliance with the requirements for registrations and reports filed under the LDA; (2) identify any challenges or potential improvements to compliance by lobbyists, lobbying firms, and registrants; and (3) describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) in its role in enforcing LDA compliance and any efforts it has made to improve that enforcement.

To determine the extent to which lobbyists can demonstrate compliance, we examined a stratified random sample of 99 quarterly lobbying disclosure (LD-2) reports with income and expenses of $5,000 or more filed during the third and fourth quarters of calendar year 2017, and the

[1]Pub. L. No. 110-81, 121 Stat. 735 (Sept. 14, 2007) *codified at* 2 U.S.C. §§ 1601-1614.

[2]2 U.S.C. § 1614.

[3]A complete list of our prior related reports is included at the end of this report.

first and second quarters of calendar year 2018.[4] We selected the randomly sampled reports from the publicly downloadable database maintained by the Clerk of the House of Representatives (Clerk of the House).[5] This methodology allows us to generalize some elements to the population of LD-2 reports. We then surveyed and interviewed each lobbyist or lobbying firm in our sample.[6] Our questionnaire asked lobbyists about their lobbying income and expenses and accompanying supporting documentation. In our follow-up interviews, we asked them to provide written documentation for key elements of their LD-2 reports. This documentation included the amount of income reported for lobbying activities, the amount of expenses reported, the houses of Congress or federal agencies lobbied, lobbying issue areas, and the names of lobbyists listed in the report. We also reviewed whether lobbyists listed on the LD-2 reports properly disclosed prior covered official positions, and whether the lobbyists filed the semiannual report of federal political contributions.

Two lobbying firms in our sample, Fierce Government Relations and Hawk International, declined to meet with us following our initial letters, sent in August 2018, and follow-up contacts in September and November 2018. We informed both firms that because they declined to meet, we would supply their names to Congress, as provided for in HLOGA.[7] Both

[4]Our original sample included 108 randomly selected LD-2 reports. After notification of our review, one lobbyist amended an LD-2 report to no lobbying activity. During our review, we identified three reports that were not associated with any lobbying activity, and additionally two lobbyists declined to participate in our survey. Each of these six cases was excluded from our review. Lastly, we excluded one report due to hardship experienced by the firm owner, and two reports that had been additional reports selected in case of significant nonresponse, which we determined that we did not need to include.

[5]Our sample is only one of a large number of samples that we might have drawn. Because each sample could have provided different estimates, we express our confidence in the precision of our estimate as a 95-percent confidence interval. This interval would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise stated, all percentage estimates have a maximum 95-percent confidence interval of within 12 percentage points or less of the estimate. For prior LD-2 reviews, we have drawn stratified random samples of 25 to 27 cases per quarter, to attain 80-100 completed cases each review.

[6]Although we contacted each lobbying firm, lobbying sole proprietorship, and organization with in-house lobbyists in our sample, we did not always meet with the lobbyists identified as the point of contact or with the actual lobbyists. We sometimes met with individuals representing the lobbyists in our sample. For the purposes of this review, we use the term lobbyists to refer to lobbyists, lobbying firms, organizations with in-house lobbyists, and individuals representing the lobbyists who were present during the interview.

[7]2 U.S.C. § 1614(c).

acknowledged understanding this provision. Appendix I contains a list of lobbyists and clients whose LD-2 reports we randomly selected for our review.

To determine whether lobbyists reported their federal political contributions as required by the LDA, we analyzed stratified random samples of year-end 2017 and midyear 2018 semiannual political contributions (LD-203) reports. The samples contain 80 LD-203 reports that have contributions listed and 80 LD-203 reports that list no contributions. We selected the randomly sampled reports from the publicly downloadable contributions database maintained by the Clerk of the House (see appendix II for a list of lobbyists and lobbying firms randomly selected for our review of LD-203 reports). We then checked the contributions reported in the Federal Election Commission's (FEC) database against the contributions identified in our sample reports.[8] This helped us determine whether all contributions reported in the FEC database were also reported on the LD-203s as required. We contacted lobbyists and asked them to provide documentation to clarify differences we observed. This methodology allows us to generalize to the population of LD-203 reports both with and without contributions.

To determine whether lobbyists were meeting the requirement to file an LD-2 report for the quarter in which they registered, we compared new registrations (LD-1) filed in the third and fourth quarters of 2017, and the first and second quarters of 2018 to the corresponding LD-2 reports on file with the Clerk of the House.

To assess the reliability of the data used, we reviewed available documentation and interviewed knowledgeable officials about the process of collecting, entering, and storing data, and mechanisms to ensure validity, reliability, and consistency of data. We found the data to be sufficiently reliable for our purposes.

To identify challenges and potential improvements to compliance, we used a structured web-based survey to obtain views from lobbyists

[8]FEC is the independent regulatory agency charged with administering and enforcing the federal campaign finance law that covers (1) public disclosure funds raised and spend to influence federal elections; (2) restrictions on contributions and expenditures made to influence federal elections; and (3) the public financing of Presidential campaigns. FEC has jurisdiction over the financing of campaigns for the U.S. House, Senate, Presidency and the Vice Presidency.

included in our sample of reports. In general, we asked lobbying firms whether it was easy or difficult to comply with the LD-2 disclosure requirements. Specifically, we asked in our survey whether they understood lobbying terms such as lobbying activities, terminating lobbyists, lobbying issues codes, and covered positions.

To describe the resources and authorities available to USAO and any efforts to improve LDA enforcement, we interviewed USAO officials and obtained information about their system's capabilities to track enforcement and compliance trends and referral data that it receives from the Secretary of the Senate and the Clerk of the House.[9] A more detailed description of our methodology is provided in appendix III.

The mandate does not require us to identify lobbyist organizations that failed to register and report in accordance with LDA requirements. The mandate also does not require us to determine whether reported lobbying activity or political contributions represented the full extent of lobbying activities that took place.

We conducted this performance audit from May 2018 to March 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The LDA defines a lobbyist as an individual who is employed or retained by a client for compensation for services that include more than one lobbying contact (written or oral communication to covered officials, such as a high ranking agency official or a Member of Congress made on behalf of a client), and whose lobbying activities represent at least 20 percent of the time that he or she spends on behalf of the client during the

[9]When a lobbyist or lobbying firm fails to provide an appropriate response to the Secretary of the Senate's or the Clerk of the House's' written notice that the individual or firm may be in noncompliance with the LDA, the Secretary of the Senate and the Clerk of the House are required to notify USAO that the lobbyist or lobbying firm may be in noncompliance. 2 U.S.C. § 1605 (a)(8).

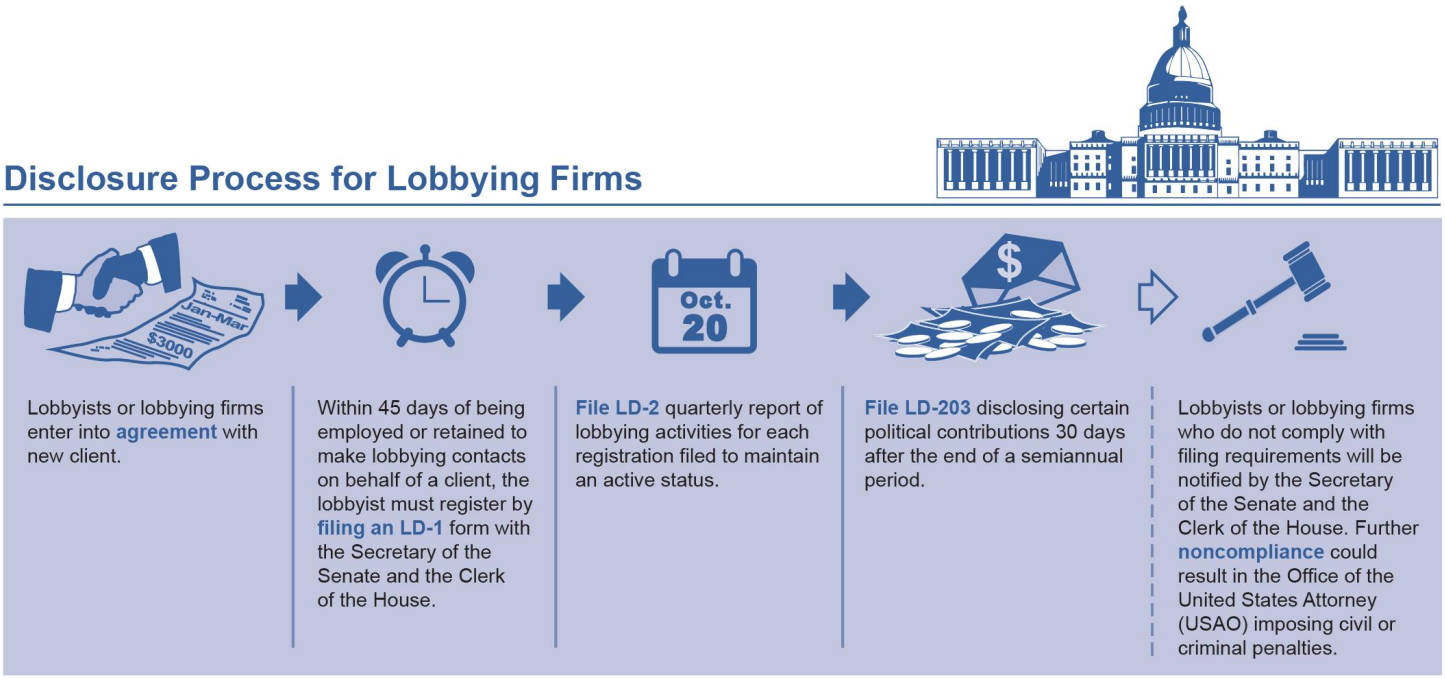
quarter.[10] Lobbying firms are persons or entities that have one or more employees who lobby on behalf of a client other than that person or entity.[11]

The LDA requires lobbyists to register with the Secretary of the Senate and the Clerk of the House, and to file quarterly reports disclosing their respective lobbying activities. Lobbyists are required to file their registrations and reports electronically with the Secretary of the Senate and the Clerk of the House through a single entry point. Registrations and reports must be publicly available in downloadable, searchable databases from the Secretary of the Senate and the Clerk of the House. No specific statutory requirements exist for lobbyists to generate or maintain documentation in support of the information disclosed in the reports they file. However, guidance issued by the Secretary of the Senate and the Clerk of the House recommends that lobbyists retain copies of their filings and documentation supporting reported income and expenses for at least 6 years after they file their reports. Figure 1 provides an overview of the registration and filing process.

[10]2 U.S.C. § 1602(10). The LDA defines a covered executive branch official as the President, Vice President, an officer or employee, or any other individual functioning in the capacity of such an officer or employee, in the Executive Office of the President; an officer or employee serving in levels I through V of the Executive Schedule; members of the uniformed services whose pay grade is at or above O-7; and any officer or employee serving in a position of a confidential, policy-determining, policy-making or policy-advocating character who is excepted from competitive service as determined by the Office of Personnel Management (commonly called Schedule C employees). 2 U.S.C. § 1602(3). The LDA defines a covered legislative branch official as a member of Congress, an elected officer of either house of Congress, or any employee or any other individual functioning in the capacity of an employee of a member, a committee of either house of Congress, the leadership staff of either house of Congress, a joint committee of Congress, or a working group or caucus organized to provide legislative services or other assistance to members. 2 U.S.C. § 1602(4). Lobbying activities include not only direct lobbying contacts but also efforts in support of such contacts, such as preparation and planning activities, research, and other background work that is intended for use in contacts. 2 U.S.C. §1602(7).

[11]2 U.S.C. § 1602(9).

Figure 1: Lobbying Disclosure Process



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

Lobbying firms are required to register with the Secretary of the Senate and the Clerk of the House for each client if the firms receive or expect to receive more than $3,000 in income from that client for lobbying activities.[12] Lobbyists are also required to submit an LD-2 quarterly report for each registration filed. The LD-2s contain information that includes:

- the name of the lobbyist reporting on quarterly lobbying activities;
- the name of the client for whom the lobbyist lobbied;
- a list of individuals who acted as lobbyists on behalf of the client during the reporting period;
- whether any lobbyists served in covered positions in the executive or legislative branch, such as high-ranking agency officials or congressional staff positions, in the previous 20 years;

[12]Organizations employing in-house lobbyists file only one registration. An organization is exempt from filing if total expenses in connection with lobbying activities are not expected to exceed $13,000. Amounts are adjusted for inflation and published in LDA guidance.

- codes describing general lobbying issue areas, such as agriculture and education;
- a description of the specific lobbying issues;
- houses of Congress and federal agencies lobbied during the reporting period; and
- reported income (or expenses for organizations with in-house lobbyists) related to lobbying activities during the quarter (rounded to the nearest $10,000).

The LDA requires lobbyists to report certain political contributions semiannually in the LD-203 report. These reports must be filed 30 days after the end of a semiannual period by each lobbying firm registered to lobby and by each individual listed as a lobbyist on a firm's lobbying report. The lobbyists or lobbying firms must:

- list the name of each federal candidate or officeholder, leadership political action committee, or political party committee to which he or she contributed at least $200 in the aggregate during the semiannual period;
- report contributions made to presidential library foundations and presidential inaugural committees;
- report funds contributed to pay the cost of an event to honor or recognize an official who was previously in a covered position, funds paid to an entity named for or controlled by a covered official, and contributions to a person or entity in recognition of an official, or to pay the costs of a meeting or other event held by or in the name of a covered official; and
- certify that they have read and are familiar with the gift and travel rules of the Senate and House, and that they have not provided, requested, or directed a gift or travel to a Member, officer, or employee of Congress that would violate those rules.

The LDA also requires that the Secretary of the Senate and the Clerk of the House guide and assist lobbyists with the registration and reporting requirements and develop common standards, rules, and procedures for LDA compliance. The Secretary of the Senate and the Clerk of the House review the guidance annually. It was last revised January 31, 2017, to (among other issues), revise the registration threshold to reflect changes in the Consumer Price Index, and clarify the identification of clients and

covered officials and issues related to rounding income and expenses.[13] The guidance provides definitions of LDA terms, elaborates on registration and reporting requirements, includes specific examples of different disclosure scenarios, and provides explanations of why certain scenarios prompt or do not prompt disclosure under the LDA. The offices of the Secretary of the Senate and the Clerk of the House told us they continue to consider information we report on lobbying disclosure compliance when they periodically update the guidance. In addition, they told us they email registered lobbyists quarterly on common compliance issues and reminders to file reports by the due dates.

The Secretary of the Senate and the Clerk of the House, along with USAO, are responsible for ensuring LDA compliance. The Secretary of the Senate and the Clerk of the House notify lobbyists or lobbying firms in writing that they are not complying with the LDA reporting. Subsequently, they refer those lobbyists who fail to provide an appropriate response to USAO. USAO researches these referrals and sends additional noncompliance notices to the lobbyists or lobbying firms, requesting that they file reports or terminate their registration. If USAO does not receive a response after 60 days, it decides whether to pursue a civil or criminal case against each noncompliant lobbyist. A civil case could lead to penalties up to $200,000 for each violation, while a criminal case—usually pursued if a lobbyist's noncompliance is found to be knowing and corrupt—could lead to a maximum of 5 years in prison.

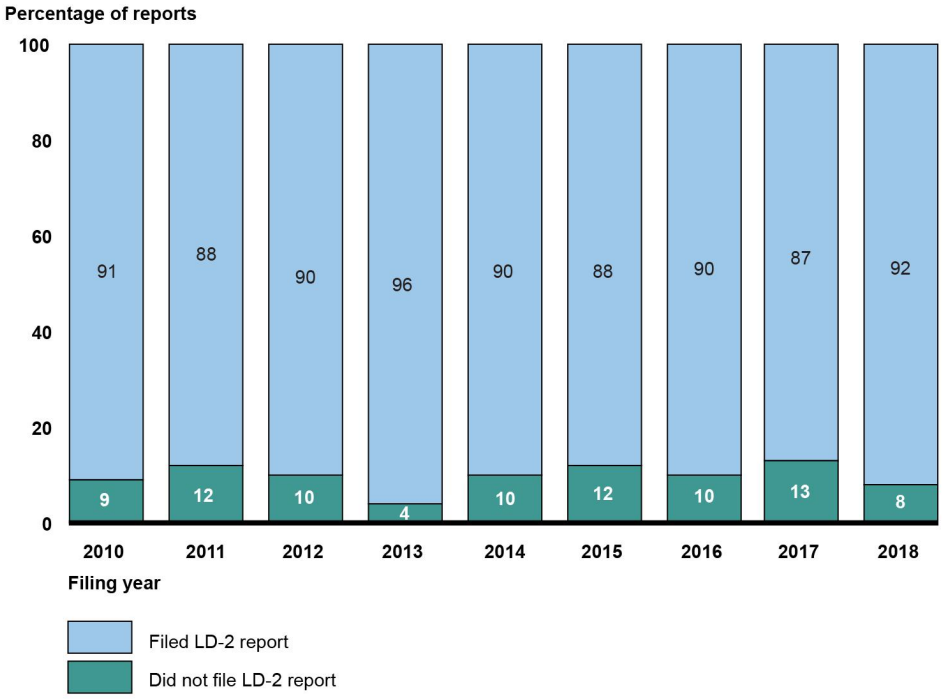
[13]An organization employing in-house lobbyists is exempt from registration if its total expenses for lobbying activities does not exceed and is not expected to exceed $13,000 during a quarterly period. The $3,000 income threshold for lobbying firms remains unchanged.

Lobbyists Generally Demonstrate Compliance with Disclosure Requirements

Lobbyists Filed Disclosure Reports as Required for Most New Lobbying Registrations

Generally, under the LDA, within 45 days of being employed or retained to make a lobbying contact on behalf of a client, the lobbyist must register by first filing an LD-1 form with the Secretary of the Senate and the Clerk of the House. Thereafter, the lobbyist must file quarterly disclosure (LD-2) reports that detail the lobbying activities, including filing a first report for the quarter in which the lobbyist registered. Of the 3,618 new registrations we identified for the third and fourth quarters of 2017 and the first and second quarters of 2018, we matched 3,329 of them (92.01 percent) to corresponding LD-2 reports filed within the same quarter as the registration. These results are consistent with the findings we have reported in prior reviews. We used the House lobbyists' disclosure database as the source of the reports. We also used an electronic matching algorithm that allows for misspellings and other minor inconsistencies between the registrations and reports. Figure 2 shows lobbyists filed disclosure reports as required for most new lobbying registrations from 2010 through 2018.

Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure (LD-2) Reports from 2010 through 2018



Source: GAO analysis. | GAO-19-357

As part of their regular enforcement procedures, the Clerk of the House and the Secretary of the Senate are to follow up with newly filed registrations where quarterly reports were not filed. If the Clerk of the House and the Secretary of the Senate are unsuccessful in bringing the lobbyist into compliance, they may refer those cases to USAO as described earlier in figure 1.

For Most LD-2 Reports, Lobbyists Provided Documentation for Key Elements, Including Documentation for Their Income and Expenses

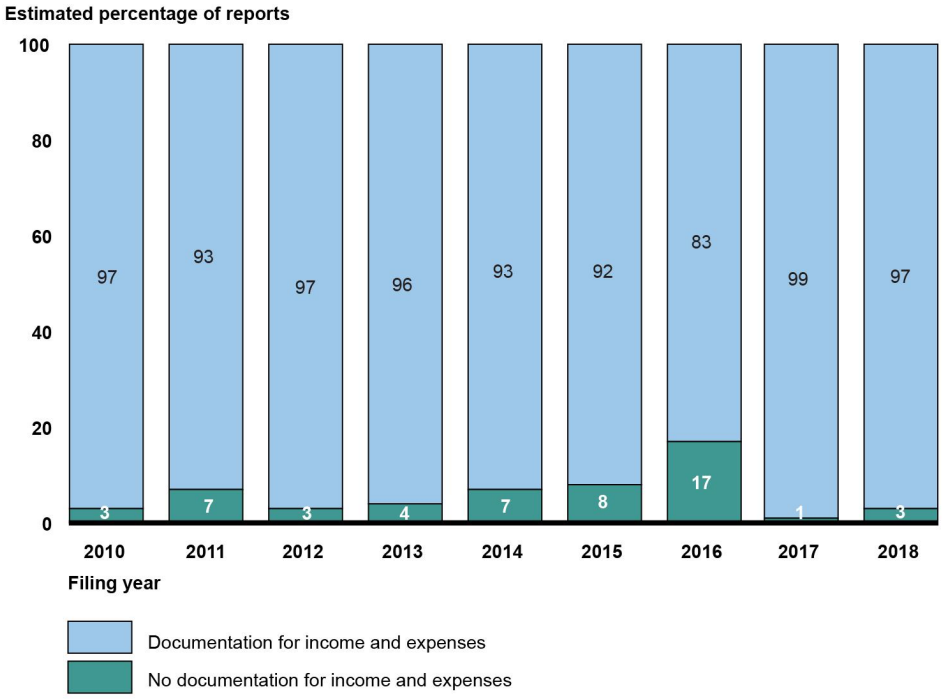
For selected elements of lobbyists' LD-2 reports that can be generalized to the population of lobbying reports, our findings have generally been

consistent from year to year.[14] Most lobbyists reporting $5,000 or more in income or expenses provided written documentation to varying degrees for the reporting elements in their disclosure reports. Figure 3 shows that for most LD-2 reports, lobbyists provided documentation for income and expenses for sampled reports from 2010 through 2018, and our 2018 estimate does not represent a statistically significant change from 2017.[15]

[14]To assess the statistical significance of change over time, we used statistical tests that adjusted for multiple comparisons across the 9 years included in our analysis. The percentage estimates of the LD-2 analysis have a maximum 95 percent confidence interval of within 12 percentage points or fewer.

[15]However, in recent years, our findings showed some variation in the estimated percentage of lobbyists who have reports with documentation for income and expenses supporting lobbying activities. Specifically, our estimate for 2017 (99 percent) represented a statistically significant increase from 2016 (83 percent). While the results provide some confidence that apparent fluctuations in our results across years are likely attributable to sampling error, the inability to detect significant differences may also be related to the nature of our sample, which was relatively small and designed only for cross-sectional analysis.

Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses from 2010 through 2018



Source: GAO analysis. | GAO-19-357

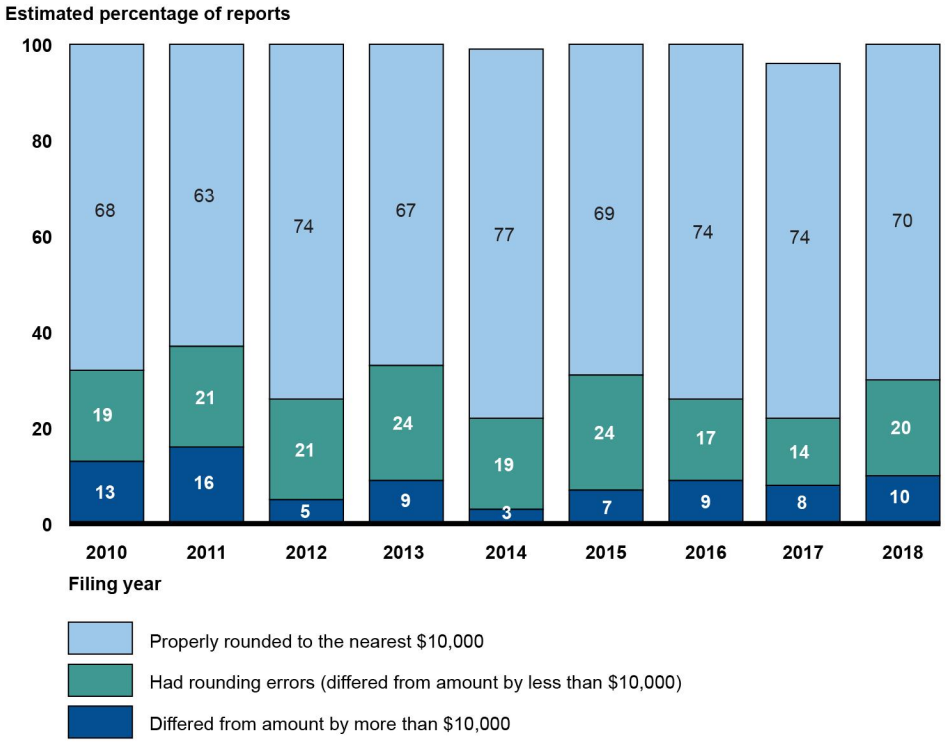
Note: Estimated percentages have a margin of error of 12 percentage points or fewer.

Figure 4 shows that in 2018, 10 percent of lobbyists' reported income or expenses differed by $10,000 or more. Additionally, for some LD-2 reports, lobbyists did not round their income or expenses as the guidance requires. In 2018, we estimate 20 percent of reports did not round reported income or expenses according to the guidance. We have found that rounding difficulties have been a recurring issue on LD-2 reports from 2010 through 2018.[16] As we previously reported, several lobbyists who listed expenses told us that based on their reading of the LD-2 form, they believed they were required to report the exact amount. While this is not consistent with the LDA and the guidance, this may be a source of some of the confusion regarding rounding errors. In 2016, the guidance was

[16]Under the LDA guidance, both the lobbying firm reporting income and the organizations reporting expenses are to provide a good faith estimate of the actual dollar amount rounded to the nearest $10,000. Our estimate of the number of reports with rounding errors includes reports that disclosed the exact amount of income from or expenditures on lobbying activities, but failed to round to the nearest $10,000 as required.

updated to include an additional example about rounding expenses to the nearest $10,000.

Figure 4: Estimated Percentage of Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses from 2010 through 2018



Source: GAO analysis. | GAO-19-357

Note: Estimated percentages have a margin of error of 12 percentage points or fewer. In 2014 and 2017, percentages do not total 100 due to rounding.

The LDA requires lobbyists to disclose lobbying contacts made with federal agencies on behalf of the client for the reporting period. This year, of the 99 LD-2 reports in our sample, 46 reports disclosed lobbying activities at federal agencies. Of those, lobbyists provided documentation for all disclosed lobbying activities at the federal agencies for 29 LD-2 reports. Figure 5 shows that lobbyists for most LD-2 reports provided documentation for selected elements of their LD-2 reports that include general issue area codes for lobbying activities, lobbying the House and the Senate, and individual lobbyists listed from 2010 through 2018. In 2017 and 2018, there was an improvement of compliance with documentation for lobbying the House and the Senate over the previous 7 years.

Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements from 2010 through 2018

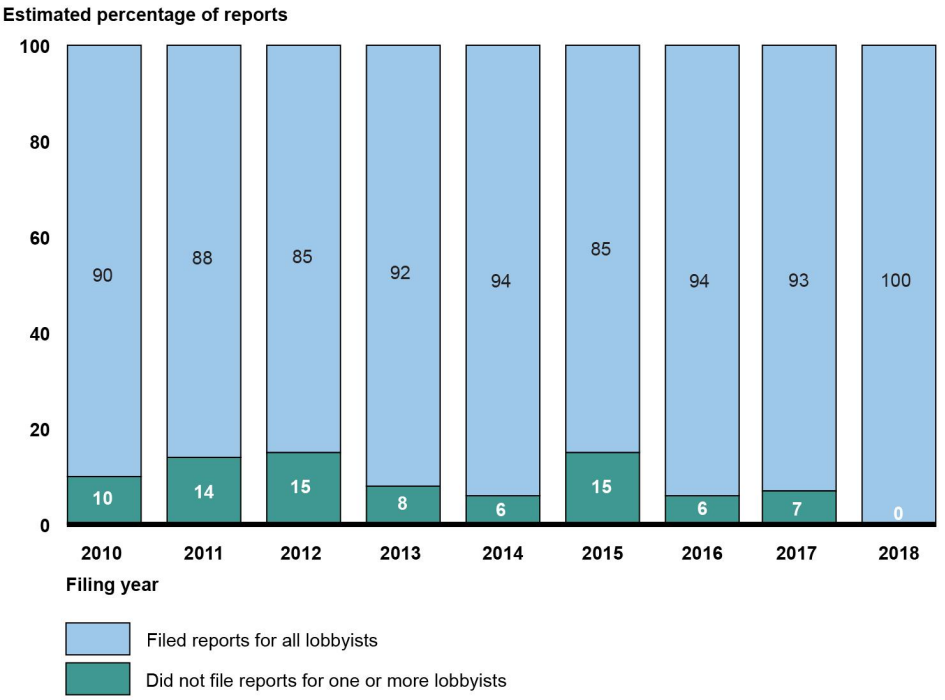
Source: GAO analysis of survey results. | GAO-19-357

Note: Estimated percentages have a margin of error of 12 percentage points or fewer.

For Most Lobbying Disclosure Reports (LD-2), Lobbyists Filed Political Contribution Reports (LD-203) for All Listed Lobbyists

Figure 6 shows that lobbyists for most lobbying firms filed contribution reports as required in our sample from 2010 through 2018. All individual lobbyists and lobbying firms reporting lobbying activity are required to file political contribution (LD-203) reports semiannually, even if they have no contributions to report, because they must certify compliance with the gift and travel rules.

Figure 6: Extent to Which Lobbyists on Lobbying Disclosure (LD-2) Reports Filed Contribution Reports for All Listed Lobbyists from 2010 to 2018



Source: GAO analysis. | GAO-19-357

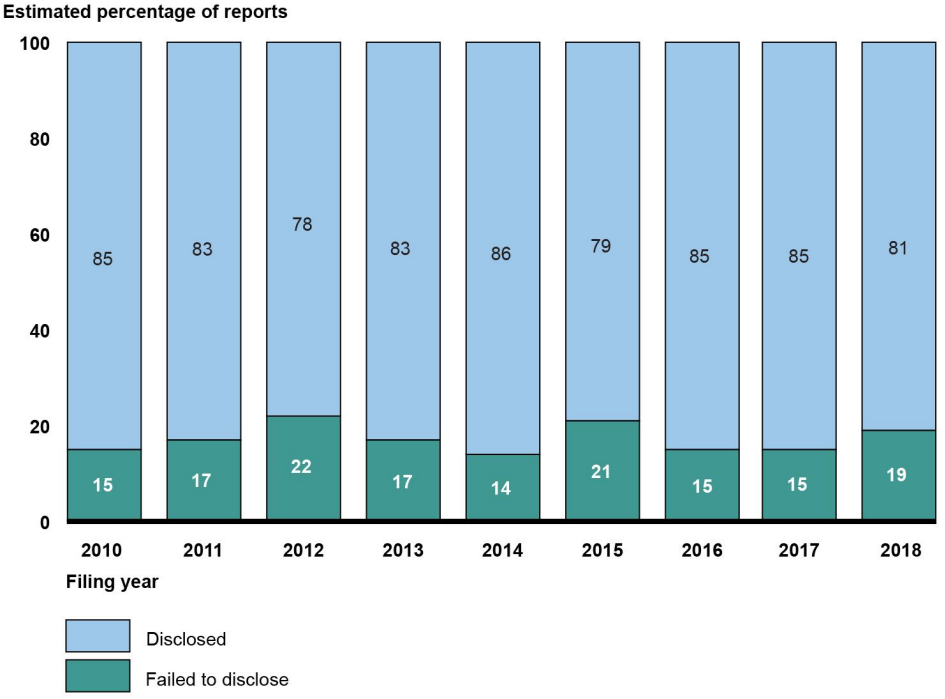
Note: Estimated percentages have a margin of error of 12 percentage points or fewer.

For Some LD-2 Reports, Lobbyists May Have Failed to Disclose Previously Held Covered Positions

The LDA requires a lobbyist to disclose previously held covered positions in the executive or legislative branch, such as high-ranking agency

officials and congressional staff, when first registering as a lobbyist for a new client. This can be done either on a new LD-1 or on the quarterly LD-2 filing when added as a new lobbyist. This year, we estimate that 19 percent of all LD-2 reports may not have properly disclosed previously held covered positions as required.[17] As in our other reports, some lobbyists were still unclear about the need to disclose certain covered positions, such as paid congressional internships or certain executive agency positions. Figure 7 shows the extent to which lobbyists may not have properly disclosed one or more covered positions as required from 2010 through 2018.

Figure 7: Estimated Percentage of Lobbying Disclosure (LD-2) Reports Where Lobbyists May Not Have Properly Disclosed One or More Covered Positions from 2010 through 2018



Source: GAO analysis. | GAO-19-357

Note: Estimated percentages have a margin of error of 12 percentage points or fewer. Lobbying disclosure requires reporting on two types of positions: covered executive branch and legislative

[17]Prior to each interview, we reviewed the lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Leadership Directories, Legistorm, and Google to determine whether lobbyists properly disclosed their covered positions as required by the LDA.

branch positions. The term covered executive branch position refers to an officer or an employee serving in: (1) a position of the Executive Schedule; (2) a position of a confidential, policy-determining, policy-making, or policy-advocating character, among others. The term covered legislative branch position refers to: (1) a Member of Congress; (2) an elected officer of either House of Congress; and (3) any employee of a Member of Congress, a committee, or the leadership staff of either House of Congress, among others.

Some Lobbyists Amended Their Disclosure Reports after We Contacted Them

Lobbyists amended 23 of the 99 LD-2 disclosure reports in our original sample to change previously reported information after we contacted them. Of the 23 reports, 10 were amended after we notified the lobbyists of our review, but before we met with them. An additional 13 of the 23 reports were amended after we met with the lobbyists to review their documentation. We consistently find a notable number of amended LD-2 reports in our sample each year following notification of our review. This suggests that sometimes our contact spurs lobbyists to more closely scrutinize their reports than they would have without our review. Table 1 lists reasons lobbying firms in our sample amended their LD-2 reports.

Table 1: Reasons Lobbyists in Our Sample Amended Their Disclosure Reports

Reason	Number of times reason was selected
Updated covered position	10
Updated income or expenses	7
Changed House, Senate or executive branch agency lobbying activity	6
Individual lobbyist	2
No lobbying activity	1
General issues	1

Source: GAO analysis. | GAO-19-357

Note: Some reports were amended for more than one reason.

Most LD-203 Contribution Reports Disclosed Political Contributions Listed in the Federal Election Commission Database

As part of our review, we compared contributions listed on lobbyists' and lobbying firms' LD-203 reports against those political contributions reported in the Federal Election Commission (FEC) database to identify whether political contributions were omitted on LD-203 reports in our

sample. The samples of LD-203 reports we reviewed contained 80 reports with contributions and 80 reports without contributions. We estimate that overall in 2018, lobbyists failed to disclose one or more reportable contributions on 33 percent of reports.[18] Additionally, eight LD-203 reports were amended in response to our review. Table 2 shows our results from 2010 to 2018; estimates in the table have a maximum margin of error of 11 percentage points. For this year's review, the estimated change in the percent of LD-203 reports missing one or more FEC-reportable contributions was a statistically significant increase compared to each of the prior 9 years.

Table 2: Percentage of Lobbying Disclosure (LD-203) Reports That Omitted One or More Political Contributions from 2010-2018

Year of Review	2010	2011	2012	2013	2014	2015	2016	2017	2018
Number of reports with contributions that had one or more omissions	7	12	14	10[a]	8	11	9	18	42
Number of reports without contributions that had one or more omissions	1	2	4	0	1	0	1	6	11
Estimated percentage of all reports with one or more omissions	4%	9%	9%	4%	4%	4%	5%	12%	33%

Source: GAO analysis. | GAO-19-357

Note: N=80, except where noted [a]N=79

Most Lobbying Firms Reported Some Level of Ease in Complying with Disclosure Requirements and Understood Lobbying Terms

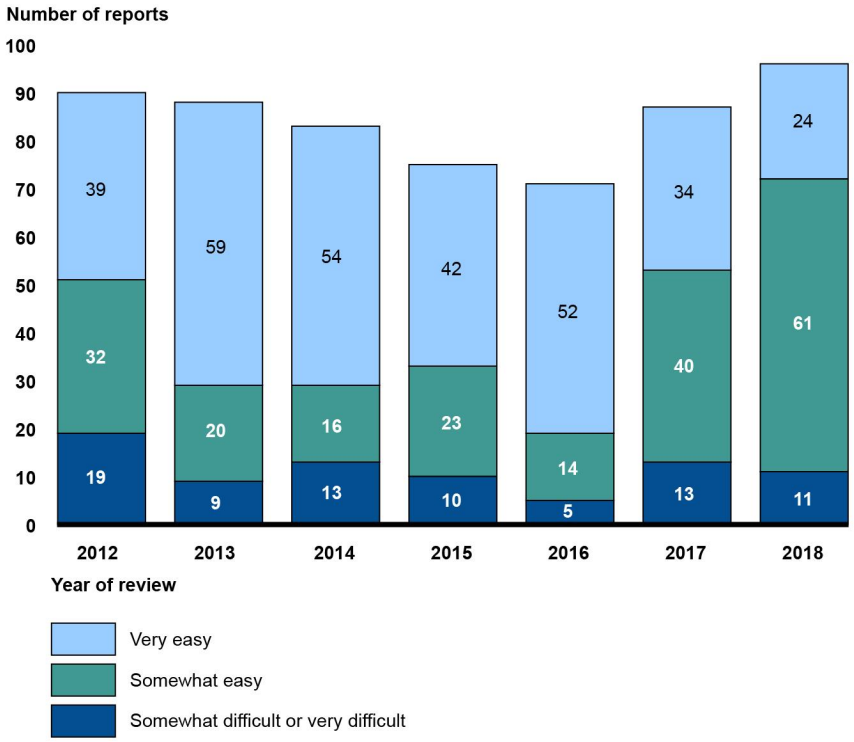
As part of our review, we conducted interviews with 97 different lobbying firms in the 2018 sample of LD-2 disclosure reports.[19] Consistent with prior reviews, most lobbying firms reported that they found it "very easy" or "somewhat easy" to comply with reporting requirements. Of the 97 different lobbying firms interviewed, 24 reported that the disclosure

[18]We did not estimate the percentage of other non-FEC political contributions that were omitted because they tend to constitute a small minority of all listed contributions and cannot be verified against an external data source.

[19]The use of the term "lobbying firms" in this context includes organizations with in-house lobbyists.

requirements were “very easy,” 61 reported them “somewhat easy,” and 11 reported them “somewhat difficult” or “very difficult.” One lobbying firm did not respond to this question (see figure 8).

Figure 8: Ease of Complying with Lobbying Disclosure Requirements 2012 through 2018

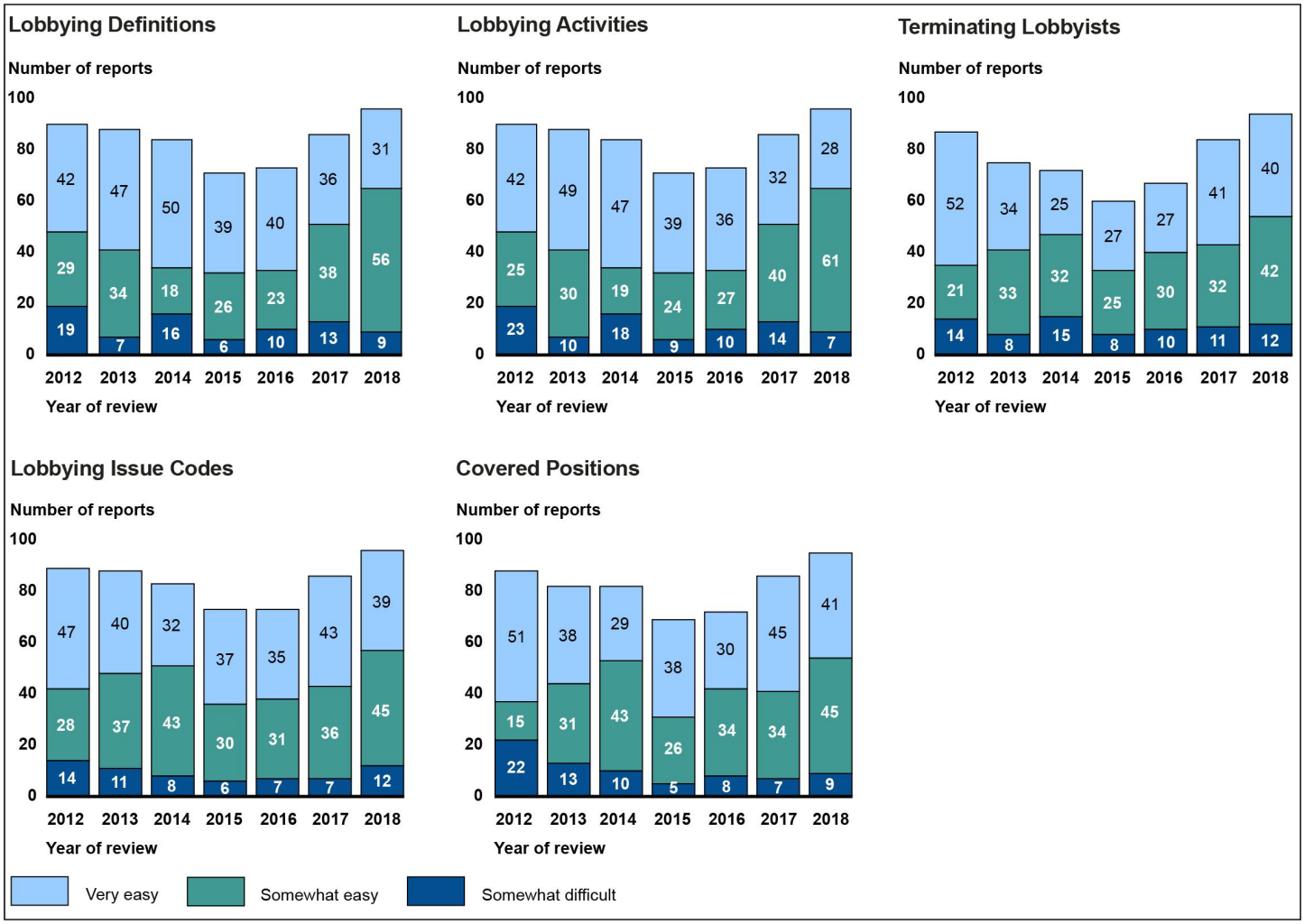


Source: GAO analysis of survey results. | GAO-19-357

Most lobbying firms we surveyed rated the definitions of terms used in LD-2 reporting as “very easy” or “somewhat easy” to understand with regard to meeting their reporting requirements. This is consistent with prior reviews. Figure 9 shows what lobbyists reported as their ease of understanding the terms associated with LD-2 reporting requirements from 2012 through 2018.[20]

[20]Some lobbying firms may not have responded to all of the questions about their ease of understanding the terms associated with LD-2 reporting requirements. Therefore, the number of responses may be inconsistent with the number of different lobbying firms in figure 9.

Figure 9: Ease of Understanding Key Lobbying Terms Definitions from 2012 through 2018



Source: GAO analysis of survey results. I GAO-19-357

Note: The number of possible responses varies because in 2015 and 2016, the sample size was reduced from 100 firms to 80 and only one response per firm is included. In 2017, the sample size increased to 100 because a reduced sample size did not give us enough power to detect and report on a change in the estimate of the percentage of reports that had documentation (83 percent down from 92 percent in 2015), or whether it was a statistically significant change. In 2018, the sample size remained 100.

The U.S. Attorney's Office for the District of Columbia Continues to Enforce the LDA

The U.S. Attorney's Office Has Resources and Authorities to Enforce LDA Compliance

The U.S. Attorney's Office for the District of Columbia (USAO) officials stated that they continue to have sufficient personnel resources and authority under the LDA to enforce reporting requirements. This includes imposing civil or criminal penalties for noncompliance. Noncompliance refers to a lobbyist's or lobbying firm's failure to comply with the LDA. However, USAO noted that due to attrition the number of the assigned personnel has changed from 2017 as indicated in table 3.

Table 3: USAO Staffing Levels, 2017-2018

2017	2018
• one contract paralegal specialist assigned full time • two paralegal specialists assigned part time	• one contract paralegal specialist assigned full time • one paralegal specialist assigned part time
• two civil attorneys – part time	• one civil attorney assigned part time
• one civil investigator as needed • one criminal attorney assigned part time • additional attorneys assigned as needed	• one civil investigator as needed • criminal and civil Assistant U.S. Attorneys are available as needed

Source: U.S. Attorney's Office for the District of Columbia. | GAO-19-357

USAO officials stated that lobbyists resolve their noncompliance issues by filing LD-2, LD-203, or LD-2 amendments, or by terminating their registration, depending on the issue. Resolving referrals can take anywhere from a few days to years, depending on the circumstances.[21] During this time, USAO creates summary reports from its database to track the overall number of referrals that are pending or become compliant as a result of the lobbyist receiving an email, phone call, or noncompliance letter. Referrals remain in the pending category until they are resolved. The pending category is divided into the following areas: "initial research for referral," "responded but not compliant," "no response

[21]Referrals are the notifications that USAO receives from the Secretary of the Senate or the Clerk of the House about a possible noncompliance of a lobbyist or lobbying firm with the LDA.

/waiting for a response," "bad address," and "unable to locate." USAO officials noted that they attempt to review and update all pending cases every six months.

USAO focuses its enforcement efforts primarily on the "responded but not compliant" and the "no response/waiting for a response" groups. Officials told us that, if after several attempts, it cannot contact the noncompliant firm or its lobbyist, it confers with both the Secretary of the Senate and the Clerk of the House to determine whether further action is needed.

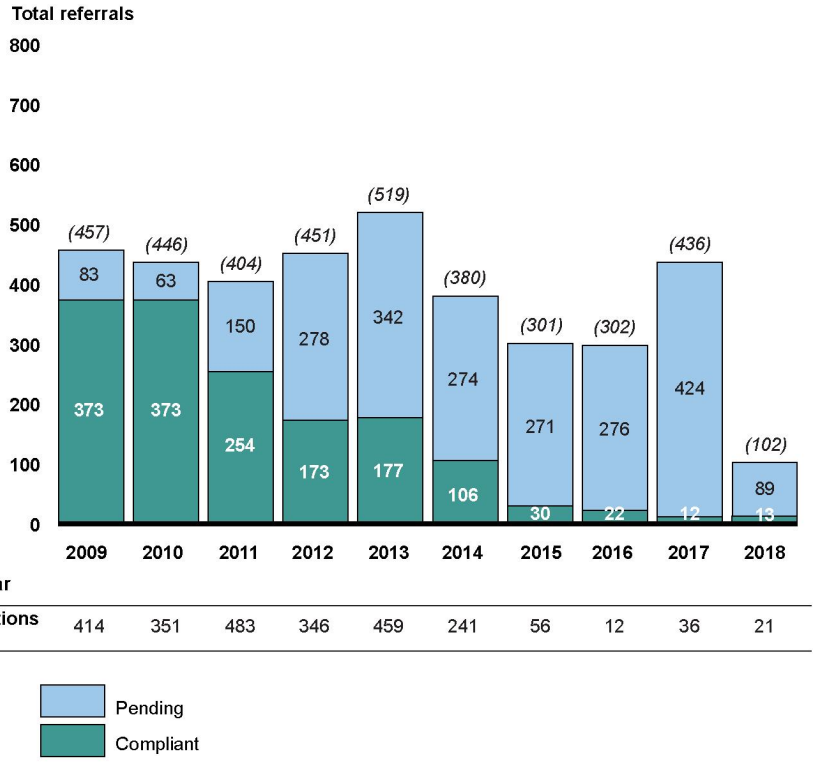
In the cases where the lobbying firm is repeatedly referred for not filing disclosure reports but does not appear to be actively lobbying, USAO suspends enforcement actions. USAO officials reported they will continue to monitor these firms and will resume enforcement actions if required.

Status of LD-2 Enforcement Efforts

USAO received 3,798 referrals from both the Secretary of the Senate and the Clerk of the House for failure to comply with LD-2 reporting requirements cumulatively for filing years 2009 through 2018. Figure 10 shows the number and status of the referrals received, and the number of enforcement actions taken by USAO to bring lobbying firms into compliance. Enforcement actions include USAO attempts to bring lobbyists into compliance through letters, emails, and calls.[22] About 40 percent (1,533 of 3,798) of the total referrals received are now compliant because lobbying firms either filed their reports or terminated their registrations. In addition, some of the referrals were found to be compliant when USAO received the referral, so no action was taken. This may occur when lobbying firms respond to the contact letters from the Secretary of the Senate and the Clerk of the House after USAO received the referrals. About 59 percent (2,250 of 3,798) of referrals are pending further action because USAO could not locate the lobbying firm, did not receive a response from the firm after an enforcement action, or plans to conduct additional research to determine if it can locate the lobbying firm. The remaining 15 referrals did not require action or were suspended because the lobbyist or client was no longer in business or the lobbyist was deceased.

[22]Referrals can include multiple parts, such as LD-2s that were not filed for several clients or LD-203s that were not filed for several lobbyists. A referral cannot be in compliance unless all the parts have been resolved. Enforcement actions reflect attempts to bring each part of the referral into compliance.

Figure 10: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-2) Reporting



Filing year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Enforcement actions on referrals	414	351	483	346	459	241	56	12	36	21

Source: U.S. Attorney's Office for the District of Columbia. | GAO-19-357

Note: Referrals may be received by the USAO months or years after the filing period to which they relate.

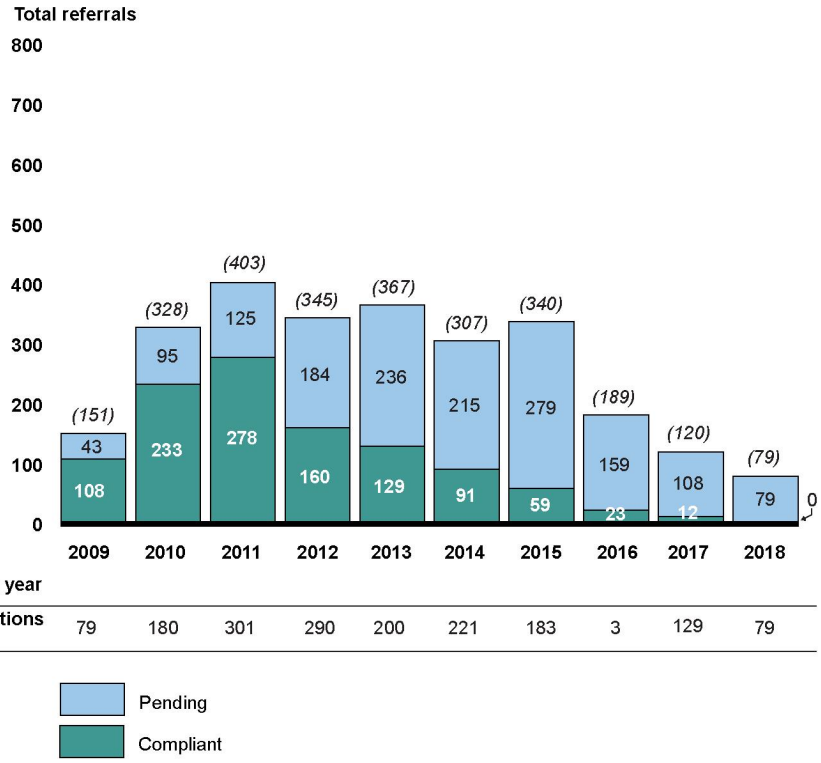
Status of LD-203 Referrals

LD-203 referrals consist of two types: (1) LD-203(R) referrals represent lobbying firms that have failed to file LD-203 reports for their lobbying firm; and (2) LD-203 referrals represent the lobbyists at the lobbying firm who have failed to file their individual LD-203 reports as required. USAO received 2,629 LD-203(R) referrals from lobbying firms (cumulatively from 2009 through 2018) and 5,897 LD-203 referrals for individual lobbyists (cumulatively from 2009 through 2017) from the Secretary of the Senate and the Clerk of the House for noncompliance with reporting requirements). LD-203 referrals are more complicated than LD-2 referrals because both the lobbying firm and the lobbyists within the firm are each required to file an LD-203. Lobbyists employed by a lobbying firm typically use the firm's contact information and not the lobbyists' personal contact

information. This makes it difficult to locate a lobbyist who is not in compliance and may have left the firm.

In 2018, USAO officials confirmed that, while many firms have assisted USAO by providing contact information for lobbyists, they are not required to do so. According to officials, USAO has difficulty pursuing LD-203 referrals for lobbyists who have departed a firm without leaving forwarding contact information with the firm. While USAO utilizes web searches and online databases, including social media, to find these missing lobbyists, it is not always successful. Figure 11 shows the status of LD-203(R) lobbying firm referrals received and the number of enforcement actions taken by USAO to bring lobbying firms into compliance. About 42 percent (1,093 of 2,629) of the lobbying firms referred by the Secretary of the Senate and the Clerk of the House for noncompliance from calendar years 2009 through 2018 are now considered compliant because firms either filed their reports or terminated their registrations. About 58 percent (1,523 of 2,629) of the referrals are pending further action. The remaining 13 referrals did not require action or were suspended because the lobbyist or client was no longer in business or the lobbyist was deceased.

Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-203(R)) Lobbying Firms Only



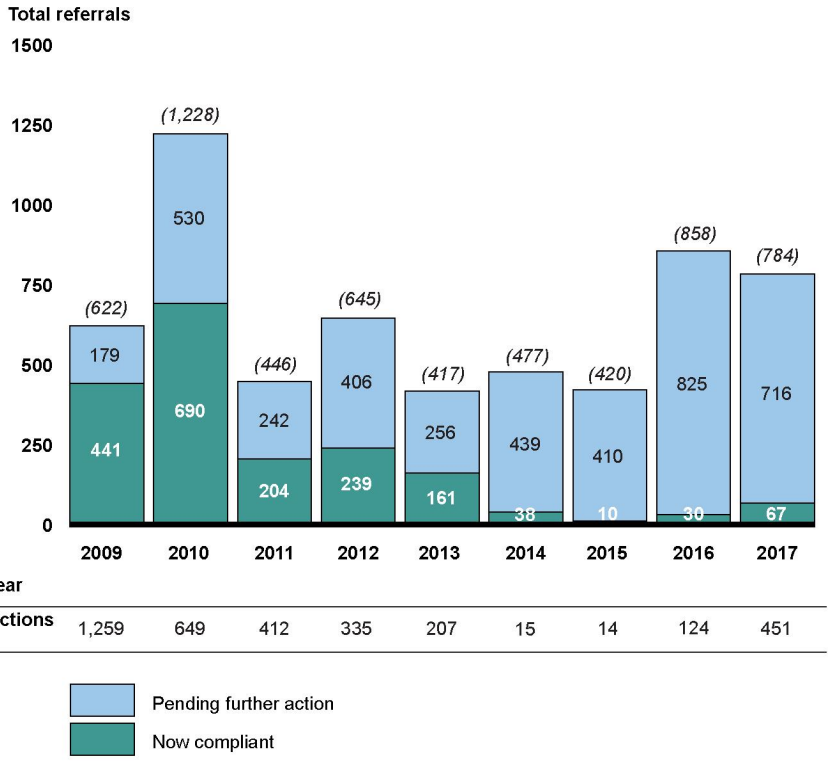
Filing year	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Enforcement actions on referrals	79	180	301	290	200	221	183	3	129	79

Source: U.S. Attorney's Office for the District of Columbia. | GAO-19-357

Note: Referrals may be received by the USAO months or years after the filing period to which they relate.

USAO received 5,897 LD-203 individual lobbyists referrals from the Secretary of the Senate and the Clerk of the House for lobbyists who failed to comply with LD-203 reporting requirements for calendar years 2009 through 2017. Figure 12 shows the status of the referrals received and the number of enforcement actions taken by USAO to bring lobbyists into compliance. In addition, figure 12 shows that about 32 percent (1,880 of 5,897) of the lobbyists had come into compliance by filing their reports or no longer being registered as a lobbyist. About 68 percent (4,003 of 5,897) of the referrals are pending further action because USAO could not locate the lobbyist, did not receive a response from the lobbyist, or plans to conduct additional research to determine if it can locate the lobbyist. The remaining 14 referrals did not require action or were suspended because the lobbyist or client was no longer in business or the lobbyist was deceased.

Figure 12: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-203) Lobbyists Only



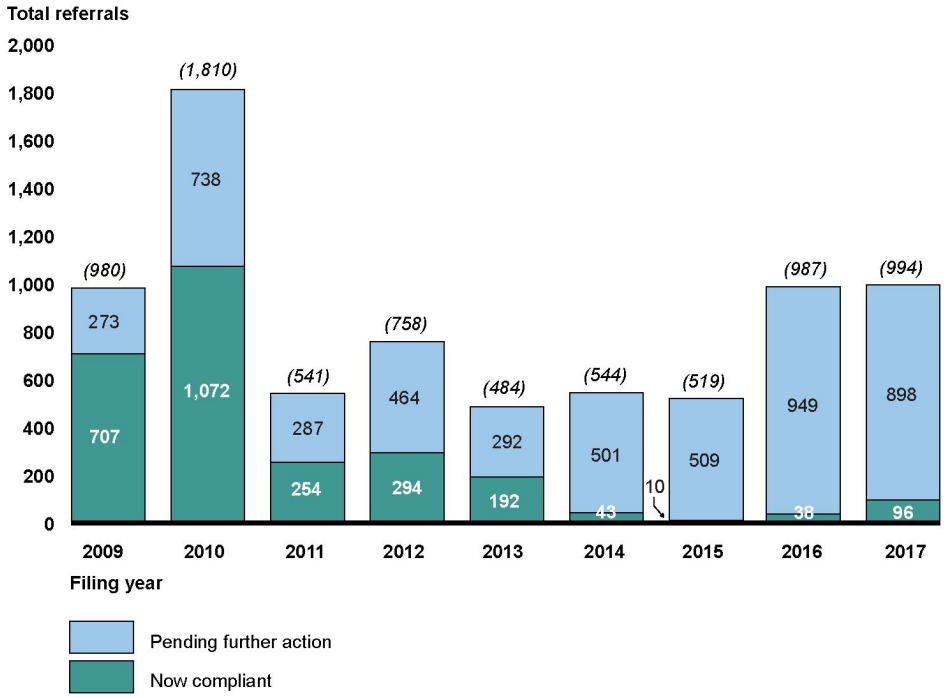
Filing year	2009	2010	2011	2012	2013	2014	2015	2016	2017
Enforcement actions on referrals	1,259	649	412	335	207	15	14	124	451

Source: U. S. Attorney's Office of the District of Columbia. | GAO-19-357

Note: No referrals have been received for 2018. Referrals may be received by the USAO months or years after the filing period to which they relate.

USAO received LD-203 referrals from the Secretary of the Senate and the Clerk of the House for 7,617 individual lobbyists who failed to comply with LD-203 reporting requirements for any filing year from 2009 through 2017. Figure 13 shows the status of compliance for individual lobbyists listed on referrals to USAO. About 36 percent (2,706 of 7,617) of the lobbyists had come into compliance by filing their reports or by not being registered as a lobbyist. About 65 percent (4,911 of 7,617) of the referrals are pending action because USAO could not locate the lobbyists, did not receive a response from the lobbyists, or plans to conduct additional research to determine if it can locate the lobbyists.

Figure 13: Status of Compliance for Lobbying Disclosure (LD-203) Lobbyists Only Referrals



Source: U.S. Attorney's Office for the District of Columbia. | GAO-19-357

Note: No referrals have been received for 2018. Referrals may be received by the USAO months or years after the filing period to which they relate.

USAO officials said that many of the pending LD-203 referrals represent lobbyists who no longer lobby for the lobbying firms affiliated with the referrals, even though these lobbying firms may be listed on the lobbyist's LD-203 report.

Status of Enforcement Settlement Actions

According to USAO officials, lobbyists and lobbying firms who repeatedly fail to file reports are labeled chronic offenders and referred to one of the assigned attorneys for follow-up. USAO also receives complaints regarding lobbyists who are allegedly lobbying but never filed an LD-203. USAO officials added that USAO monitors and investigates chronic offenders to ultimately determine the appropriate enforcement actions, which may include settlement or other civil actions.

Additionally, USAO officials reported that they are working to resolve an active case involving a chronic offender firm and lobbyist that was

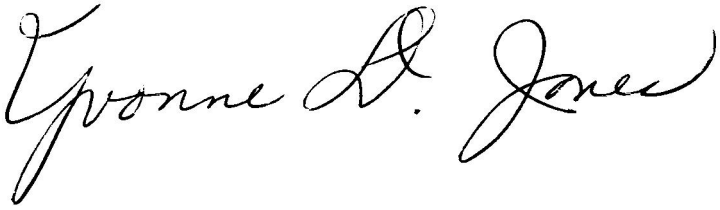
pending as of 2018. USAO officials noted that the agency is continuing settlement discussions with the company that failed to respond to required LDA violation notices and its lobbyist did not respond to individual violations for semiannual reporting. The company is now current on filing its reports and USAO is working with the Secretary of the Senate and the Clerk of the House on settling past violations. USAO continues to review its records to identify additional chronic offenders for further action due to noncompliance.

Agency Comments

We provided a draft of this report to the Department of Justice for review and comment. The Department of Justice did not have comments.

We are sending copies of this report to the Attorney General, the Secretary of the Senate, the Clerk of the House of Representatives, and interested congressional committees and members. In addition, this report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-2717 or jonesy@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix IV.



Yvonne D. Jones
Director, Strategic Issues

List of Committees

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The Honorable Gary C. Peters
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The Honorable Jerrold Lewis Nadler
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The Honorable Doug Collins
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House of Representatives

The Honorable Elijah E. Cummings
Chairman
The Honorable James D. Jordan
Ranking Member
Committee on Oversight and Reform
House of Representatives

Appendix I: List of Lobbyists and Clients for Sampled Lobbying Disclosure Reports

The random sample of lobbying disclosure reports we selected was based on unique combination of House ID, lobbyist, and client names (see table 4).

Table 4: Names of Lobbyist and Clients Selected in Random Sampling of Lobbyist Disclosure Reports Filed in the Third and Fourth Quarters of 2017 and First and Second Quarters of 2018

Lobbyists	Clients
Airbnb, Inc.	Airbnb, Inc.
Akerman LLP	Port of Palm Beach
Akerman LLP	Scotts Valley Band of Pomo Indians
Akin Gump Strauss Hauer & Feld	TerreStar Corporation
Alcalde & Fay	City of Riviera Beach, Florida
Alliance of Community Health Plans, Inc.	Alliance of Community Health Plans, Inc.
Alpine Group, Inc.	Grassland Water District
Alston & Bird LLP	CHE Senior Psychological Services
Alzheimer's Association	Alzheimer's Association
American Association for Clinical Chemistry	American Association for Clinical Chemistry
American Continental Group	The Jockey Club
American Defense International, Inc.	Xtreme Concepts, Inc.
American Horse Council	American Horse Council
American Kidney Fund	American Kidney Fund
American Public University System	American Public University System
Anndyl Policy Group, LLC	Renew Financial
Arnold & Porter Kaye Scholer LLP	Verisign, Inc.
BGR Government Affairs	American Family Mutual Insurance Company S.I.
Bracewell LLP	Pier 1 Imports, Inc.
Brooks Bawden, LLC	Major County Sheriffs' Association
Brownstein Hyatt Farber Schreck, LLP	Ardent Health Services
Brownstein Hyatt Farber Schreck, LLP	Guaranteed Asset Protection Alliance
Cannae Policy Group LLC	Veterans Assembled Electronics, LLC

Lobbyists	Clients
Capitol Hill Partners	Western Alliance of Farmworker Advocates
Capitol Legislative Strategies LLC	Home Builders Association of Central Arizona
Capitol Tax Partners, LLP	H & R Block Management, LLC
Card & Associates, LLC	PillPack
Cassidy & Associates, Inc.	University of Southern Mississippi
Center for Individual Freedom	Center for Individual Freedom
CF Industries, Inc.	CF Industries, Inc.
Comcast Corporation	Comcast Corporation
Cornerstone Government Affairs, Inc.	Catholic Health Association
Corus Federal Strategies	Deep Springs Technology, LLC
Covington & Burling LLP	Unisys Corporation
Crossroads Strategies, LLC	Salesforce.Com, Inc.
Crossroads Strategies, LLC	Spotify USA Inc.
Crossroads Strategies, LLC	Northrop Grumman Corporation
CSL Behring LLC	CSL Behring LLC
Faegre Baker Daniels Consulting	Global Down Syndrome Foundation
Federal Science Partners LLC	Vaisala, Inc.
Fierce Government Relationsa	Kindred Healthcare
Fonterra Cooperative Group Limited	Fonterra Cooperative Group Limited
Foresight Law + Policy PLLC	Consortium for School Networking
General Electric Company (Including Subsidiaries)	General Electric Company (Including Subsidiaries)
Grizzle Company	Regional Airport Authority of Louisville & Jefferson County
Harbinger Strategies, LLC	Facebook, Inc.
Hawk International, LLC[a]	International Chiropractors Association
Health and Medicine Counsel of Washington	U.S. Hereditary Angioedema Association
Hobart Hallaway & Quayle Ventures, LLC	SF Motors, Inc.
Hogan Lovells US LLP	Credit Suisse Securities (USA)
Hollier & Associates	National Shooting Sports Foundation
ImmigrationWorks USA	ImmigrationWorks USA
Invariant LLC	ChowNow, Inc.
J.A. Green & Company (Formerly LLC)	Electron Energy Corporation
K&L Gates LLP	Velocys Inc
K&L Gates LLP	Coalition for Energy Efficient Jobs & Investment
K&L Gates LLP	Gulf of Mexico Reef Fish Shareholders' Alliance
K&L Gates LLP	Trans-Atlantic Business Council
Kelley Drye & Warren LLP	Outdoor Amusement Business Association
King & Spalding LLP	BioScrip, Inc.

Lobbyists	Clients
Lewis-Burke Associates, LLC	California Institute of Technology
Lewis-Burke Associates, LLC	University of Cincinnati
Lord Corporation	Lord Corporation
Lyondell Chemical Company	Lyondell Chemical Company
Marcus G. Faust, PC	Clark County Water Reclamation District
Mercury	Movement Mortgage
Michael Best Strategies LLC	Plains All American Pipeline, L.P.
MI Strategies, LLC	PriceSmart, Inc.
Monument Policy Group, LLC	Target Logistics Management LLC (Formerly Known as Target Lodging Management LLC
Mr. Alan Reuther	UAW Retiree Medical Benefits Trust
Mr. James Edwards	National Association of Small Trucking Companies
Mr. Marshall Brachman	Physicians Realty Trust
Ms. Marla Grossman	American Continental Group on Behalf of the Songwriters Guild of America
NAIOP	NAIOP
Nathanson+Hauck	Pew Charitable Trusts
National Association of Electrical Distributors, Inc.	National Association of Electrical Distributors, Inc.
O'Neill And Associates	Alaska Airlines
Polaris-Hutton Group, LLC	General Motors Company
Policy Matters, LLC (Formerly Known As TKB Consulting, LLC)	The Community Reach Center
Porterfield, Fettig & Sears, LLC	Prudential Financial
Potomac Partners DC	9/11 Memorial
Powers, Pyles, Sutter & Verville, PC	ID Experts Corp
Prime Policy Group	New Hanover County
Prime Policy Group	New Hanover County
Raffaniello & Associates	American Institute of Certified Public Accountants
Roberti Global (F/K/A Roberti White, LLC)	General Motors, LLC
S-3 Group	Arise Virtual Solutions
SBL Strategies, LLC	Santa Rosa County, FL
Signal Group Consulting, LLC	Microsoft Corporation
Stanton Park Group	ScribeAmerica
Strategic Health Care	Gaylord Hospital
Subject Matter (fka Elmendorf Ryan)	Davita Inc.
Taylor Strategies	Intrexon Corporation
The American Public Gas Association	The American Public Gas Association
The Colwell Group, LLC	USI Insurance Services
The FGA Group LLC	American E-Liquids Manufacturing Standards Association

Lobbyists	Clients
The Livingston Group, L.L.C.	Sasol Chemicals (USA) LLC
The Livingston Group, L.L.C.	TenCate Protective Fabrics North America
The Margolin Group	County of Santa Clara
The McManus Group	Achaogen
The Russell Group, Inc.	National Association of Clean Water Agencies
The Simmons & Russell Group, LLC	Google Inc.
Thomas Walters & Associates, Inc.	County of Santa Barbara
Thorsen French Advocacy LLC	Beer Institute
Van Scoyoc Associates	Corporate Friends of CDC, Inc.
Venable LLP	State Street Bank and Trust Company
Venn Strategies	Lifetouch
Williams And Jensen, PLLC	Plasma Protein Therapeutics Association

Source: Lobbying disclosure database of the Clerk of the House of Representatives for the third and fourth quarters of 2017 and the first and second quarters of 2018. | GAO-19-357

[a]Firms did not participate in GAO's lobbying disclosure survey.

Appendix II: List of Sampled Lobbying Contribution Reports with and without Contributions Listed

Table 5: Lobbyists and Lobbying Firms in Sample of Lobbying Contribution Reports with Contributions Listed, Filed Year-End 2017 and Midyear 2018

Lobbyist or lobbying firm	Reporting period
Act For America	Year-end 2017
Air Line Pilots Association Inc. PAC	Midyear 2018
American Lung Association	Midyear 2018
American Society for Radiation Oncology	Midyear 2018
American Traffic Safety Services Association	Midyear 2018
Andrew Howell	Year-end 2017
Atlantic Strategies Group	Midyear 2018
Bryce L. Harlow	Midyear 2018
Building and Construction Trades Dept., AFL-CIO	Year-end 2017
Carlos Becerra	Midyear 2018
Catherine Finley	Year-end 2017
Celgene Corporation	Year-end 2017
Charles Garrison	Year-end 2017
Chet Thompson	Midyear 2018
Clint Hackney	Midyear 2018
David Anderson	Year-end 2017
David C. Rich	Midyear 2018
Dora Hughes	Year-end 2017
Elizabeth Reicherts	Midyear 2018
Erik Robert Olson	Year-end 2017
Erika Nijenhuis	Year-end 2017
Gary Michael Hall	Midyear 2018
George Cooper	Midyear 2018
Intel Corporation PAC	Year-end 2017
Jacqueline S. Glassman	Midyear 2018

Lobbyist or lobbying firm	Reporting period
James Hall	Year-end 2017
James Heimbach	Midyear 2018
Jamie Gregorian	Midyear 2018
Janice Kupiec	Year-end 2017
Jason Hill	Midyear 2018
Javier DeJesus Martinez	Midyear 2018
Jeffrey McMillen	Midyear 2018
Jerry “Jay” Driscoll	Year-end 2017
Jesse Barba	Midyear 2018
Jessica Lawrence-Vaca	Year-end 2017
Jessica Woolley	Midyear 2018
John Tolman	Midyear 2018
Jonathan Paone	Midyear 2018
Katherine Cullen	Midyear 2018
Kevin Allis	Midyear 2018
Kristin Welsh	Midyear 2018
Laurence Lane	Midyear 2018
Lucas Tomanelli	Year-end 2017
Manuel Ortiz	Year-end 2017
Mark Eugene Kinney	Year-end 2017
Marti Thomas	Midyear 2018
Matthew Lee Johnson	Year-end 2017
Michael A. Andrews	Year-end 2017
Michael A. Brairton	Year-end 2017
Michael Mattoon	Midyear 2018
Michael Rapelyea	Year-end 2017
Mike Biagi	Midyear 2018
Miranda Franco	Year-end 2017
Nancy Dorn	Year-end 2017
National Multifamily Housing Council, Inc.	Midyear 2018
National Nurses United: a Fund for a Healthy America	Year-end 2017
National Organization for The Reform of Marijuana Laws	Year-end 2017
Navient Solutions, LLC	Midyear 2018
Nina Ozlu Tunceli	Year-end 2017
Owens-Illinois, Inc. Employees Good Citizenship Fund	Year-end 2017
Paul T. Donovan	Year-end 2017
Peter Haller	Year-end 2017

Lobbyist or lobbying firm	Reporting period
Peter Haller	Midyear 2018
Princeton University	Year-end 2017
Ricky Le	Midyear 2018
Robert Flock	Midyear 2018
SSA Marine	Midyear 2018
SSAB Americas PAC	Year-end 2017
Stanley G. Fendley	Midyear 2018
Steve Glaze	Year-end 2017
Stuart P. Ingis	Year-end 2017
Susan Esserman	Midyear 2018
Beef PAC of Texas Cattle Feeders Association	Midyear 2018
The Velasquez Group, LLC	Year-end 2017
Tiahrt Enterprises, LLC	Year-end 2017
Valero Energy Corporation	Year-end 2017
Vanguard Group	Year-end 2017
Wiley Rein LLP	Year-end 2017
William Piper	Midyear 2018
William Simpson	Year-end 2017

Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2017 and midyear reports for calendar year 2018. | GAO-19-357.

Table 6: Lobbyists and Lobbying Firms in Random Sample of Lobbying Contribution Reports without Contributions Listed, Filed Year-End 2017 or Midyear 2018

Lobbyist or lobbying firm	Reporting period
60 Plus Association	Year-end 2017
American Financial Services Association PAC	Year-end 2017
American Small Manufacturers Coalition	Midyear 2018
Andrew Saelens	Midyear 2018
Barbara G. Broussard	Year-end 2017
Bartlett Naylor	Midyear 2018
Billy Howe	Midyear 2018
Carolina L. Mederos	Year-end 2017
Carolyn B. Gleason	Year-end 2017
Carrie Hunt	Midyear 2018
Christopher LaGrone	Year-end 2017
Courtney Piron	Midyear 2018
Da Vinci Group	Year-end 2017

Lobbyist or lobbying firm	Reporting period
Daniel Bryant	Year-end 2017
Danielle Burr	Midyear 2018
Deborah Saxon	Year-end 2017
Denise B. Muha	Midyear 2018
Eric Dixon	Year-end 2017
Erik Schneider	Year-end 2017
Evan Rachkovsky	Midyear 2018
Feng-Yen Li	Year-end 2017
Fernando Gomez	Year-end 2017
Geoffrey Plague	Midyear 2018
GRQ, LLC	Midyear 2018
Harbinger Strategies, LLC	Year-end 2017
Heather McNatt Hennessey	Midyear 2018
Jack Thompson	Midyear 2018
Jacqueline Ball	Midyear 2018
Jane Starke	Midyear 2018
Jeffery Fluck	Midyear 2018
Jennifer Rachel Kefer	Midyear 2018
Jessica Carlton	Midyear 2018
John D. Van Etten	Year-end 2017
John Ladd	Year-end 2017
John Scott Gray	Year-end 2017
Jose Ceballos	Year-end 2017
Joseph Kuklis	Year-end 2017
Joseph Mondello	Year-end 2017
Joshua Habursky	Year-end 2017
Karl Brooma	Midyear 2018
Kenneth A. Brown	Midyear 2018
Maile L. Wilson	Midyear 2018
Mark Cothran	Year-end 2017
Martin Frost	Midyear 2018
Matthew Schafle	Midyear 2018
Medical Group Management Association	Year-end 2017
Michael F. Scanlon	Year-end 2017
Morna Willens	Midyear 2018
Mrs. Holly Stevens	Year-end 2017
Ms. Diane O'Toole	Midyear 2018

Lobbyist or lobbying firm	Reporting period
Ms. Rebecca Halkias	Year-end 2017
Nokia of America Corporation	Midyear 2018
Nydia Bonnin	Midyear 2018
Patricia Davitt Long	Midyear 2018
Patrick Arness	Midyear 2018
Paul T. Kelly	Year-end 2017
Phillip Lovell	Year-end 2017
Robert Kappelmann	Midyear 2018
Ronald Bird	Year-end 2017
Ryan D. Flickner	Year-end 2017
S-3 Group	Year-end 2017
Scott Olson	Year-end 2017
Sean Peter Devery	Year-end 2017
Shaun Sahlhoff	Midyear 2018
Slover & Loftus	Midyear 2018
Spiegel & McDiarmid, LLP	Midyear 2018
Stephanie Gupta	Year-end 2017
Stephen G. Wood	Year-end 2017
Suzanne C. Sterner	Midyear 2018
Thair Phillips	Year-end 2017
Anesthesia Service Medical Group Advocacy Fund	Midyear 2018
The Lambos Firm, LLP (Formerly Known as The Lambos Firm)	Year-end 2017
The Shelburne Group	Year-end 2017
The Trade Partnership	Year-end 2017
Thomas Lindsley	Midyear 2018
Thomas Paris	Midyear 2018
TJS III Holdings LLC	Midyear 2018
Ultra Electronics Advanced Tactical Systems	Year-end 2017
University of Central Florida	Midyear 2018
Zachary Scott	Midyear 2018

Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2017 and midyear reports for calendar year 2018. | GAO-19-357.

Appendix III: Objectives, Scope, and Methodology

Our objectives were to determine the extent to which lobbyists are able to demonstrate compliance with the Lobbying Disclosure Act of 1995, as amended (LDA) by providing documentation (1) to support information contained on registrations and reports filed under the LDA; (2) to identify challenges or potential improvements to compliance, if any; and (3) to describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO), its role in enforcing LDA compliance, and any efforts it has made to improve LDA enforcement.

We used information in the lobbying disclosure database maintained by the Clerk of the House of Representatives (Clerk of the House). To assess whether these disclosure data were sufficiently reliable for the purposes of this report, we reviewed relevant documentation and consulted with knowledgeable officials. Although registrations and reports are filed through a single web portal, each chamber subsequently receives copies of the data and follows different data-cleaning, processing, and editing procedures before storing the data in either individual files (in the House) or databases (in the Senate). Currently, there is no means of reconciling discrepancies between the two databases caused by the differences in data processing. For example, Senate staff told us during previous reviews they set aside a greater proportion of registration and report submissions than the House for manual review before entering the information into the database. As a result, the Senate database would be slightly less current than the House database on any given day pending review and clearance.

House staff told us during previous reviews that they rely heavily on automated processing. In addition, while they manually review reports that do not perfectly match information on file for a given lobbyist or client, staff members approve and upload such reports as originally filed by each lobbyist, even if the reports contain errors or discrepancies (such as a variant on how a name is spelled). Nevertheless, we do not have reason to believe that the content of the Senate and House systems would vary substantially. Based on interviews with knowledgeable officials and a review of documentation, we determined that House disclosure data were sufficiently reliable for identifying a sample of quarterly disclosure reports

(LD-2) and for assessing whether newly filed lobbyists also filed required reports. We used the House database for sampling LD-2 reports from the third and fourth quarters of 2017 and the first and second quarters of 2018, as well as for sampling year-end 2017 and midyear 2018 political contributions reports (LD-203). We also used the database for matching quarterly registrations with filed reports. We did not evaluate the Offices of the Secretary of the Senate or the Clerk of the House, both of which have key roles in the lobbying disclosure process. However, we did consult with officials from each office. They provided us with general background information at our request.

To assess the extent to which lobbyists could provide evidence of their compliance with reporting requirements, we examined a stratified random sample of 99 LD-2 reports from the third and fourth quarters of 2017 and the first and second quarters of 2018.[1] We excluded reports with no lobbying activity or with income or expenses of less than $5,000 from our sampling frame.[2] We drew our sample from 49,918 activity reports filed for the third and fourth quarters of 2017 and the first and second quarters of 2018 available in the public House database, as of our final download date for each quarter.

Our sample of LD-2 reports was not designed to detect differences over time. However, we conducted tests of significance for changes from 2010 to 2018 for the generalizable elements of our review. We found that results were generally consistent from year to year and there were few statistically significant changes (as noted in our report) after using a Bonferroni adjustment to account for multiple comparisons.[3] For this

[1]Our original sample included 108 randomly selected LD-2 reports. After notification of our review, one lobbyist amended an LD-2 report to no lobbying activity. During our review, we identified three reports that were not associated with any lobbying activity, and additionally two lobbyists declined to participate in our survey. Each of these six cases were excluded from our review. Lastly, we excluded one report due to hardship experienced by the firm owner and two additional reports selected in case of significant nonresponse.

[2]LD-2 activity reports with “no lobbying issue activity” and reports with less than $5,000 in reported income or expenses are filtered out because they do not contain verifiable information on income, expenses, or activity.

[3]A Bonferroni adjustment is a statistical adjustment designed to reduce the chance of making a type-1 inferential error that is concluding that a difference exists when it is instead an artifact of sampling error. The adjustment raises the threshold for concluding that any single difference is “statistically significant” so that overall the chance of making at least one type-1 error when making multiple comparisons does not exceed a specified level.

year's review, we estimated that 97 percent of LD-2 reports provided written documentation for the lobbying income and expenses.

Our sample is based on a stratified random selection and is only one of a large number of samples that we may have drawn. Because each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95-percent confidence interval. This interval would contain the actual population value for 95 percent of the samples that we could have drawn. The percentage estimates for LD-2 reports have 95-percent confidence intervals of within plus or minus 12 percentage points or fewer of the estimate itself.

We contacted all the lobbyists and lobbying firms in our sample and, using a structured web-based survey, asked them to confirm key elements of the LD-2 and whether they could provide written documentation for key elements in their reports, including

- the amount of income reported for lobbying activities;
- the amount of expenses reported on lobbying activities;
- the names of those lobbyists listed in the report;
- the houses of Congress and the federal agencies that they lobbied, and
- the issue codes listed to describe their lobbying activity.

After reviewing the survey results for completeness, we interviewed lobbyists and lobbying firms to review the documentation they reported as having on their online survey for selected elements of their respective LD-2 report.

Prior to each interview, we conducted a search to determine whether lobbyists properly disclosed their covered position as required by the LDA. We reviewed the lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Leadership Directories, Legistorm, and Google. Prior to 2008, lobbyists were only required to disclose covered official positions held within 2 years of registering as a lobbyist for the client. The Honest Leadership and Open Government Act of 2007 amended that time frame to require disclosure of positions held 20 years before the date the lobbyists first lobbied on behalf of the client. Lobbyists are required to disclose previously held covered official positions either on the client registration (LD-1) or on an LD-2 report. Consequently, those who held covered official positions may have disclosed the information on the LD-1 or a LD-2 report filed prior to the report we examined as part of

our random sample. Therefore, where we found evidence that a lobbyist previously held a covered official position, and that information was not disclosed on the LD-2 report under review, we conducted an additional review of the publicly available Secretary of the Senate or Clerk of the House database to determine whether the lobbyist properly disclosed the covered official position on a prior report or LD-1. Finally, if a lobbyist appeared to hold a covered position that was not disclosed, we asked for an explanation at the interview with the lobbying firm to ensure that our research was accurate.

In previous reports, we reported the lower bound of a 90-percent confidence interval to provide a minimum estimate of omitted covered positions and omitted contributions with a 95-percent confidence level. We did so to account for the possibility that our searches may have failed to identify all possible omitted covered positions and contributions. As we have developed our methodology over time, we are more confident in the comprehensiveness of our searches for these items. Accordingly, this report presents the estimated percentages for omitted contributions and omitted covered positions rather than the minimum estimates. As a result, percentage estimates for these items will differ slightly from the minimum percentage estimates presented in prior reports.

In addition to examining the content of the LD-2 reports, we confirmed whether the most recent LD-203 reports had been filed for each firm and lobbyist listed on the LD-2 reports in our random sample. Although this review represents a random selection of lobbyists and firms, it is not a direct probability sample of firms filing LD-2 reports or lobbyists listed on LD-2 reports. As such, we did not estimate the likelihood that LD-203 reports were appropriately filed for the population of firms or lobbyists listed on LD-2 reports.

To determine if the LDA's requirement for lobbyists to file a report in the quarter of registration was met for the third and fourth quarters of 2017 and the first and second quarters of 2018, we used data filed with the Clerk of the House to match newly filed registrations with corresponding disclosure reports. Using an electronic matching algorithm that includes strict and loose text matching procedures, we identified matching disclosure reports for 3,329, or 92.01 percent, of the 3,618 newly filed registrations. We began by standardizing client and lobbyist names in both the report and registration files (including removing punctuation and standardizing words and abbreviations, such as "company" and "CO"). We then matched reports and registrations using the House identification

number (which is linked to a unique lobbyist-client pair), as well as the names of the lobbyist and client.

For reports we could not match by identification number and standardized name, we also attempted to match reports and registrations by client and lobbyist name, allowing for variations in the names to accommodate minor misspellings or typos. For these cases, we used professional judgment to determine whether cases with typos were sufficiently similar to consider as matches. We could not readily identify matches in the report database for the remaining registrations using electronic means.

To assess the accuracy of the LD-203 reports, we analyzed stratified random samples of LD-203 reports from the 29,798 total LD-203 reports. The first sample contains 80 reports of the 9,502 reports with political contributions and the second contains 80 reports of the 20,296 reports listing no contributions. Each sample contains 40 reports from the year-end 2017 filing period and 40 reports from the midyear 2018 filing period. The samples from 2018 allow us to generalize estimates in this report to either the population of LD-203 reports with contributions or the reports without contributions to within a 95-percent confidence interval of within plus or minus 11 percentage points or fewer. Although our sample of LD-203 reports was not designed to detect differences over time, for this year's review, the estimated change in percentage of LD-203 reports missing one or more reportable contributions was a statistically significant increase compared to each of the prior 9 years.[4]

While the results provide some confidence that apparent fluctuations in our results across years are likely attributable to sampling error, the inability to detect significant differences may also be related to the nature of our sample, which was relatively small and designed only for cross-sectional analysis. We analyzed the contents of the LD-203 reports and compared them to contribution data found in the publicly available Federal Elections Commission's (FEC) political contribution database. We consulted with staff at FEC responsible for administering the database. We determined that the data are sufficiently reliable for the purposes of our reporting objectives.

[4]We used a Bonferroni adjustment to adjust for multiple comparisons to account for the pairwise tests for each item examined.

We compared the FEC-reportable contributions on the LD-203 reports with information in the FEC database. The verification process required text and pattern matching procedures so we used professional judgment when assessing whether an individual listed is the same individual filing an LD-203. For contributions reported in the FEC database and not on the LD-203 report, we asked the lobbyists or organizations to explain why the contribution was not listed on the LD-203 report or to provide documentation of those contributions. As with covered positions on LD-2 disclosure reports, we cannot be certain that our review identified all cases of FEC-reportable contributions that were inappropriately omitted from a lobbyist's LD-203 report. We did not estimate the percentage of other non-FEC political contributions that were omitted because they tend to constitute a small minority of all listed contributions and cannot be verified against an external source.

To identify challenges to compliance, we used a structured web-based survey and obtained the views from 97 different lobbying firms included in our sample on any challenges to compliance. The number of different lobbying firms is 97, which is less than our original sample of 99 reports because some lobbying firms had more than one LD-2 report included in our sample. We calculated responses based on the number of different lobbying firms that we contacted rather than the number of interviews. Prior to our calculations, we removed the duplicate lobbying firms based on the most recent date of their responses. For those cases with the same response date, the decision rule was to keep the cases with the smallest assigned case identification number. To obtain their views, we asked them to rate their ease with complying with the LD-2 disclosure requirements using a scale of "very easy," "somewhat easy," "somewhat difficult," or "very difficult." In addition, using the same scale, we asked them to rate the ease of understanding the terms associated with LD-2 reporting requirements.[5]

To describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) and its efforts to improve its LDA enforcement, we interviewed USAO officials. We obtained information on the capabilities of the system officials established to track and report compliance trends and referrals and on other practices established to focus resources on LDA enforcement. USAO provided us

[5]One lobbying firm did not respond to the questions about their ease of understanding the terms associated with LD-2 reporting requirements.

with reports from the tracking system on the number and status of referrals and chronically noncompliant lobbyists and lobbying firms.

The mandate does not require us to identify lobbyists who failed to register and report in accordance with the LDA requirements, or determine for those lobbyists who did register and report whether all lobbying activity or contributions were disclosed. Therefore, this was outside the scope of our audit.

We conducted this performance audit from May 2018 to March 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Yvonne D. Jones, (202) 512-2717 or jonesy@gao.gov

Staff Acknowledgments

In addition to the contact named above, Clifton G. Douglas Jr. (Assistant Director), Shirley Jones (Managing Associate General Counsel), Ulyana Panchishin (Analyst-in-Charge), James Ashley, Krista Loose, Kathleen Jones, Amanda Miller, Sharon Miller, Robert Robinson, Stewart W. Small, Peter Verchinski, and Khristi Wilkins made key contributions to this report. Assisting with lobbyist file reviews were Adam Brooks, Jazzmin R. Cooper, Colleen Corcoran, Rianna B. Jansen, Benjamin Legow, Regina Morrison, Andrew Olson, Amanda R. Prichard, Alan Rozzi, Bryan Sakakeeny, Kate Wulff, and Edith P. Yuh.

Appendix V: Accessible Data

Data Tables

Accessible Data for Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure (LD-2) Reports from 2010 through 2018

Filing year	Did not file LD-2 report	Filed LD-2 report
2010	9	91
2011	12	88
2012	10	90
2013	4	96
2014	10	90
2015	12	88
2016	10	90
2017	13	87
2018	8	92

Accessible Data for Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses from 2010 through 2018

Filing year	No documentation	Documentation
2010	3	97
2011	7	93
2012	3	97
2013	4	96
2014	7	93
2015	8	92
2016	17	83
2017	1	99
2018	3	97

Accessible Data for Figure 4: Estimated Percentage of Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses from 2010 through 2018

Filing year	Differed from amount by more than $10,000	Had rounding errors (differed from amount by less than $10,000	Properly rounded to the nearest $10,000
2010	13	19	68
2011	16	21	63
2012	5	21	74
2013	9	24	67
2014	3	19	77
2015	7	24	69
2016	9	17	74
2017	8	14	74
2018	10	20	70

Accessible Data for Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements from 2010 through 2018

Data for General Issue Areas

Year or review	Documentation for all issue codes	Documentation for some issue codes	No documentation for issue codes
2010	85	9	6
2011	79	7	14
2012	76	4	20
2013	77	5	18
2014	87	4	9
2015	89	6	5
2016	77	9	14
2017	92	4	4
2018	84	11	5

Data for Individual Lobbyists Listed

Year of review	No documentation for lobbyists	Documentation for some	Documentation for all
2010	7	21	72
2011	15	17	68

Year of review	No documentation for lobbyists	Documentation for some	Documentation for all
2012	18	13	69
2013	13	23	64
2014	2	18	80
2015	9	14	77
2016	13	19	68
2017	3	19	78
2018	5	19	76

Data for Lobbying House of Representatives

Year of review	No documentation for lobbying the House	Documentation for lobbying the House
2010	22	78
2011	19	81
2012	29	71
2013	26	74
2014	11	89
2015	24	76
2016	12	88
2017	3	97
2018	4	96

Data for Lobbying the Senate

Year of review	No documentation for lobbying the Senate	Documentation for lobbying the Senate
2010	21	79
2011	22	78
2012	28	72
2013	25	75
2014	10	90
2015	17	83
2016	16	84
2017	3	97
2018	3	97

Accessible Data for Figure 6: Extent to Which Lobbyists on Lobbying Disclosure (LD-2) Reports Filed Contribution Reports for All Listed Lobbyists from 2010 to 2018

Filing year	Did not file reports for one or more lobbyists	Filed reports for all lobbyists
2010	10	90
2011	14	86
2012	15	85
2013	8	92
2014	6	94
2015	15	85
2016	6	94
2017	7	93
2018	0	100

Accessible Data for Figure 7: Estimated Percentage of Lobbying Disclosure (LD-2) Reports Where Lobbyists May Not Have Properly Disclosed One or More Covered Positions from 2010 through 2018

Year	Failed to disclose	Disclosed
2010	15	85
2011	17	83
2012	22	78
2013	17	83
2014	14	86
2015	21	79
2016	15	85
2017	15	85
2018	19	81

Accessible Data for Figure 8: Ease of Complying with Lobbying Disclosure Requirements 2012 through 2018

Year	Somewhat difficult	Somewhat easy	Very easy
2012	19	32	39
2013	9	20	59
2014	13	16	54
2015	10	23	42

Year	Somewhat difficult	Somewhat easy	Very easy
2016	5	14	52
2017	13	40	34
2018	11	61	24

Accessible Data for Figure 9: Ease of Understanding Key Lobbying Terms Definitions from 2012 through 2018

Data for Lobbying Definitions

Year	Somewhat difficult	Somewhat easy	Very easy
2012	19	29	42
2013	7	34	47
2014	16	18	50
2015	6	26	39
2016	10	23	40
2017	13	38	35
2018	9	56	31

Data for Lobbying Activities

Year	Somewhat difficult	Somewhat easy	Very easy
2012	23	25	42
2013	10	30	49
2014	18	19	47
2015	9	24	39
2016	10	27	36
2017	14	40	32
2018	7	61	28

Data for Terminating Lobbyists

Year	Somewhat difficult	Somewhat easy	Very easy
2012	14	21	52
2013	8	33	34
2014	15	32	25
2015	8	25	27
2016	10	30	27
2017	11	32	41

Year	Somewhat difficult	Somewhat easy	Very easy
2018	12	42	40

Data for Lobbying Issue Codes

Year	Somewhat difficult	Somewhat easy	Very easy
2012	14	28	47
2013	11	37	40
2014	8	43	32
2015	6	30	37
2016	7	31	35
2017	7	36	43
2018	12	45	39

Data for Covered Positions

Year	Somewhat difficult	Somewhat easy	Very easy
2012	22	15	51
2013	13	31	38
2014	10	43	29
2015	5	26	38
2016	8	34	30
2017	7	34	45
2018	9	45	41

Accessible Data for Figure 10: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-2) Reporting

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2009	457	373	83	1	414
2010	446	373	63	10	351
2011	404	254	150	0	483
2012	451	173	278	0	346
2013	519	177	342	0	459
2014	380	106	274	0	241
2015	301	30	271	0	56
2016	302	22	276	4	12

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2017	436	12	424	0	36
2018	102	13	89	0	21
Total	3,798	1,533	2,250	15	2,419

Accessible Data for Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-203(R)) Lobbying Firms Only

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2009	151	108	43	0	79
2010	328	233	95	0	180
2011	403	278	125	0	301
2012	345	160	184	1	290
2013	367	129	236	2	200
2014	307	91	215	1	221
2015	340	59	279	2	183
2016	189	23	159	7	3
2017	120	12	108	0	129
2018	79	0	79	0	79
Total	2,629	1,093	1,523	13	1,665

Accessible Data for Figure 12: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure (LD-203) Lobbyists Only

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2009	622	441	179	2	1259
2010	1228	690	530	8	649
2011	446	204	242	0	412
2012	645	239	406	0	335

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2013	417	161	256	0	207
2014	477	38	439	0	15
2015	420	10	410	0	14
2016	858	30	825	3	124
2017	784	67	716	1	451
Totals	5,897	1,880	4,003	14	3,466

Accessible Data for Figure 13: Status of Compliance for Lobbying Disclosure (LD-203) Lobbyists Only Referrals

Filing year	Number of lobbyists on referrals received	Lobbyist now compliant on referrals received	Lobbyists still pending on referrals received
2009	980	707	273
2010	1810	1072	738
2011	541	254	287
2012	758	294	464
2013	484	192	292
2014	544	43	501
2015	519	10	509
2016	987	38	949
2017	994	96	898
Totals	7,617	2,706	4,911

Related GAO Products

Lobbying Disclosure: Observations on Lobbyists' Compliance with New Disclosure Requirements. GAO-08-1099. Washington, D.C: September 30, 2008.

2008 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-09-487. Washington, D.C: April 1, 2009.

2009 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-10-499. Washington, D.C: April 1, 2010.

2010 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-11-452. Washington, D.C: April 1, 2011.

2011 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-12-492. Washington, D.C: March 30, 2012.

2012 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-13-437. Washington, D.C: April 1, 2013.

2013 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-14-485. Washington, D.C: May 28, 2014.

2014 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-15-310. Washington, D.C.: March 26, 2015.

2015 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-16-320. Washington, D.C.: March 24, 2016.

2016 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-17-385. Washington, D.C.: March 31, 2017.

2017 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. GAO-18-388, Washington, D.C.: March 30, 2018.

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