

GAO Highlights

Highlights of [GAO-15-310](#), a report to congressional committees

Why GAO Did This Study

LDA requires lobbyists to file quarterly lobbying disclosure reports and semiannual reports on certain political contributions. The law also requires that GAO annually audit lobbyists' compliance with the LDA. GAO's objectives were to (1) audit the extent to which lobbyists can demonstrate compliance with disclosure requirements, (2) identify challenges to compliance that lobbyists report, and (3) describe the resources and authorities available to USAO in its role in enforcing LDA compliance, and the efforts USAO has made to improve enforcement. This is GAO's eighth report under the mandate.

GAO reviewed a stratified random sample of 100 quarterly disclosure LD-2 reports filed for the third and fourth quarters of calendar year 2013 and the first and second quarters of calendar year 2014. GAO also reviewed two random samples totaling 160 LD-203 reports from year-end 2013 and midyear 2014. This methodology allowed GAO to generalize to the population of 46,599 disclosure reports with \$5,000 or more in lobbying activity, and 30,524 reports of federal political campaign contributions. GAO also met with officials from USAO to obtain status updates on its efforts to focus resources on lobbyists who fail to comply.

GAO provided a draft of this report to the Attorney General for review and comment. The Department of Justice provided a technical comment, which GAO incorporated as appropriate.

View [GAO-15-310](#). For more information, contact J Christopher Mihm at (202) 512-6806 or mihmj@gao.gov.

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2014 LOBBYING DISCLOSURE

Observations on Lobbyists' Compliance with Disclosure Requirements

What GAO Found

For the 2014 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 2013 and the first and second quarter of 2014, GAO estimates that

- 90 percent of lobbyists filed initial LD-2 reports as required for new lobbying registrations (lobbyists are required to file LD-2 reports for the quarter in which they first register).
- 93 percent could provide documentation for income and expenses. However, 21 percent of these LD-2 reports were not properly rounded to the nearest \$10,000 and 6 percent of those reports listed the exact amount.
- 94 percent filed year-end 2013 reports as required.
- 14 percent of all LD-2 reports did not properly disclose one or more previously held covered positions (certain positions in the executive and legislative branches) as required.
- 4 percent of all LD-203 reports omitted one or more reportable political contributions that were documented in the Federal Election Commission database.

These findings are generally consistent with prior reports GAO issued for the 2010 through 2013 reporting periods and can be generalized to the population of disclosure reports.

Over the past several years of reporting on lobbying disclosure, GAO has found that most lobbyists in the sample rated the terms associated with LD-2 reporting as "very easy" or "somewhat easy" to understand with regard to meeting their reporting requirements. However, some disclosure reports demonstrate compliance difficulties, such as failure to disclose covered positions or misreporting of income or expenses. In addition, lobbyists amended 19 of 100 original disclosure reports in GAO's sample, changing information previously reported.

The U.S. Attorney's Office for the District of Columbia (USAO) stated it has sufficient resources and authority to enforce LD-2 and LD-203 compliance with LDA. It has one contract paralegal working full time and six attorneys working part time on LDA enforcement issues.

USAO continued its efforts to follow up on referrals for noncompliance with lobbying disclosure requirements by contacting lobbyists by e-mail, telephone, and letter. Also, USAO has finalized a settlement with a lobbyist to resolve multiple instances of noncompliance and is in the process of finalizing another settlement.