



Client Semi-Annual and Client Semi-Annual Amendment Information

*All individuals are required to have a personal NY.gov ID account and a **verified** User Profile before any Filing can be submitted in the Commission's Lobbying Application ('LA'). The User Profile is the mechanism that allows an individual access to an Organization's Profile so that they can manage their account as well as prepare and submit Filings on their behalf.*

PURPOSE

The purpose of this document is to provide Filers with further clarification of the information required to be disclosed in Client Semi-Annual Reports and Client Semi-Annual Report Amendments in the Commission's Lobbying Application.

NOTES: This document is **not** intended to assist Individuals/Organizations in determining whether their activities require registration and reporting to the Commission.

- For assistance in determining whether your activities are considered Lobbying Activities and require reporting to the Commission as a Lobbyist or a Client, please refer to the regulations available on the Commission website.
- For assistance with Filings themselves, please see the detailed step-by-step 'click here' instructions on how to file available on the Commission website.

THINGS TO KNOW

- **ETHICS TRAINING REQUIREMENT:** Lobbyists, Contractual Clients and Beneficial Clients listed on a submitted 2023-2024 Lobbyist or Public Corporation Statement of Registration are required to take the '**Ethical Standards for Lobbyists and Clients**' training course. (SEE the '[Ethics Training for Lobbyists and Clients](#)' page for the most up-to-date information regarding ethics training.)
- The Lobbying Act requires that any Contractual Client retaining, employing or designating a Lobbyist or Lobbyists - whether or not any such Lobbyist was required to file a Statement of Registration or Bi-monthly Report - who meets or reasonably anticipates that during the year an amount in excess of \$5,000 in combined **Reportable Compensation** and **Reportable Expenses** for Lobbying Activities on a State and/or Municipal level will be expended or incurred, is required to submit a Client Semi-Annual ("CSA") Report.
- Every CSA Report must list a Contractual Client and **at least one** Beneficial Client (the Contractual and Beneficial Client can be the same).
- Annually, one CSA Report for each reporting period per Contractual Client may be filed.

Client Semi-Annual and Client Semi-Annual Amendment Information (updated September 2023)

- The CSA Report requires disclosure of the **actual** Lobbying Activities that occurred during the specific reporting period.
- If the \$5,000 threshold is exceeded during the January/June reporting period, a July/December CSA Report must be filed even if no further monies are expended, unless the Lobbying Agreement or Authorization between the Principal Lobbyist and Contractual Client is terminated on or before June 30th.
- If a January/June CSA Report is filed, but the \$5,000 threshold has not been met for the calendar year, then a July/December CSA Report is **not** required to be filed.
- A CSA Report can be started, saved and submitted beginning on the first day of the CSA reporting period (example – the January/June CSA Report can be started January 1).
- A CSA Report can be completed and submitted after a Contractual Client’s relationship has terminated with a Principal Lobbyist (after the Termination Effective Date), as long as the Contractual Client had an ‘active’ relationship with at least one Principal Lobbyist during the CSA reporting period.
- Once submitted, the Filer cannot make any changes to the CSA Report; changes can only be made by submitting an Amended CSA Report.
- Once submitted, a CSA Report cannot be deleted. The Filer must submit a Request to Withdraw to remove the Filing from public view.
- Source of Funding (“SoF”) is considered part of the CSA Report. **Every Beneficial Client is required to either: (1) Disclose Source(s) of Funding (‘SoF’); or (2) Indicate SoF reporting is not required.** Contractual Clients are responsible for all other parts of the CSA Report.
- In addition to Contractual Clients, every Beneficial Client is also required to submit a **Reportable Business Relationship (“RBR”)** Report, if applicable. This filing will be appended to the Contractual Client’s CSA Report and will be viewable in the Beneficial Client(s) SoF & RBR tab.

CSA REPORTING PERIODS & DUE DATES

CSA REPORTING PERIOD	PERIOD COVERED	DUE DATE
January/June	January 1 – June 30	July 15
July/December	July 1 – December 31	January 15

NOTE: There is a 7-day grace period from a Filing’s statutory due date to submit a required Statement and/or Report(s) before any potential late fees *may* be imposed.

EXCEPTIONS TO THE CLIENT SEMI-ANNUAL FILING REQUIREMENT

If you are a Contractual Client who lobbies on your own behalf (you are the Principal Lobbyist, Contractual Client and Beneficial Client) and do not use a Retained Lobbyist, you are **NOT REQUIRED** to complete a CSA Report, **other than SoF Disclosures**. A system-generated CSA Report will be created for you; see information below*.

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

See SoF Instructions for more information

➤ **Information regarding the system-generated CSA Report*:**

- LA will automatically create a system-generated CSA Report for you based on the information disclosed in your Employed Lobbyist's applicable Bi-monthly Reports submitted during the corresponding CSA reporting period (the Statement of Registration, Bi-monthly Reports and any applicable amendments).
- No filing fee is required for system-generated CSA Reports.

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

INFORMATION COLLECTED ON THE CLIENT SEMI-ANNUAL REPORT

The online Client Semi-Annual form in the LA contains its own main navigation menu and can be viewed in a "tabbed format" or in "full view", depending on Filer preference.

Online Filings will populate specific information from existing Profiles, if available:

- Principal Lobbyist Information (including Public Corporations)
- Contractual Client Information
- Beneficial Client Information

Online Filings will also populate information from associated or previously submitted Filings, if available:

- **Employed Lobbyists** – Information disclosed in your Employed Lobbyist's applicable Bi-monthly Reports submitted during the corresponding six-month CSA reporting period (Employed Lobbyist names, Compensation, Expenses, Level of Government, and Lobbying Activities).

Client Semi-Annual and Client Semi-Annual Amendment Information (updated September 2023)

- **Retained Lobbyists** – Lobbyist names who have an ‘active’ Contract/Authorization during corresponding the six-month CSA reporting period.
- **Lobbying Activities** – Information reported by your Retained Lobbyists on their applicable Bi-monthly Reports submitted during the corresponding six-month CSA reporting period are available for selection. (More information can be found below in the ‘Lobbying Activities’ section).
- **Source of Funding (“SoF”) information** is populated from the most recent SoF Filing or SoF Amendment submitted by affiliated Beneficial Client(s) listed on the CSA Report.
- **If applicable, Reportable Business Relationship (“RBR”) information** is populated from the most recent RBR filing or RBR Amendment submitted by affiliated Beneficial Client(s) listed on the CSA Report.

INFORMATION CONTAINED IN A CLIENT SEMI-ANNUAL REPORT

The Client Semi-Annual Report contains the following fields. Items denoted with a red asterisk “” are required fields.*

Client Information*

The **Client Organization** **MUST** have an active, verified Profile in LA **BEFORE** a CSA Report is started so the correct information is populated from their Organization Profile(s).

CLARIFICATION: The **term Client** includes both *Contractual* and *Beneficial* Clients. The name(s) of both the *Contractual* and *Beneficial* Client(s) (“BC”) must be identified on every CSA Report. The *Contractual* Client and *Beneficial* Client can be the same person or entity.

NOTE: A Member who retains a Lobbyist on behalf of an Unstructured Coalition is considered the Contractual and Beneficial Client on associated filings and must submit a Client Semi-Annual Report and Source of Funding disclosure, as applicable. Refer to the Coalition guidance document entitled ***Coalition Filing Requirements*** for detailed guidance on Lobbying Activities involving Coalitions.

CONTRACTUAL CLIENT

DEFINITION: An individual or Organization that retains the services of a Lobbyist for the benefit of itself or another.

NOTE: If you are a Contractual Client who lobbies on your own behalf (you are both the Principal Lobbyist and Contractual Client), you are **not required** to complete a CSA Report. However, **you are required to disclose Source of Funding (SoF) information.*** (SEE SoF Information Instructions). As previously noted, a system-generated CSA Report will automatically be created (SEE **Information regarding the system-generated CSA Report**).

BENEFICIAL CLIENT

DEFINITION: The specific individual(s) or organization(s) on whose behalf and at whose request or behest Lobbying Activity is conducted by the Principal Lobbyist(s).

An individual or Organization that lobbies on its own behalf is a Beneficial Client.

NOTE: If you are a Beneficial Client listed on a CSA Report who is also a member of an Unstructured Coalition, please refer to the *'Coalition Member Contributions to Unstructured Coalitions (if applicable)'* section of this document.

CSA Reporting Year*

Select the Biennial Period you are filing for from the drop-down menu (two-year periods commencing with the January 1, 2019 – December 31, 2020 period, and so on thereafter). CSA Reports within the corresponding Biennial Period that are available will be selectable.

CSA Year/Reporting Period*

- January/June
- July/December

Beneficial Client Information*

The name of any Beneficial Client(s) reported by your Principal Lobbyist(s) on their Statement of Registration(s) where you are listed as the Contractual Client will automatically populate on your CSA.

The **'Beneficial Client'** may be the *same* as the **'Contractual Client'**.

You can add a new Beneficial Client(s) directly to a CSA Report by either:

- (1) entering the first few characters of the **'Beneficial Client'** name in the text search box to select an Organization who has an existing Profile in LA; **OR**
- (2) saving your CSA Report and then creating a 'placeholder' Organization Profile for each Beneficial Client you wish to add. (*Refer to page 7 of 'Step 3: How to Claim or Create Lobbyist or Client Organization Profiles'* on the Commission's website).

NOTE: If you add new Beneficial Client(s) directly to your CSA Report, you may also be required to amend associated Filings to add the Beneficial Client(s).

➤ **When creating a 'placeholder' Organization Profile, you will be required to provide the following information:**

- (a) **Beneficial Client Business Name:** The **Organization Name** (including Structured Coalitions and Public Corporations)

- (b) **Beneficial Client Business Address, Phone Number, Email Address:** The address, phone number, and email address of the Beneficial Client's place of business.

You can remove a Beneficial Client(s) from CSA Report

You can only remove Beneficial Client(s) that you added. You **CANNOT** remove any *Beneficial Client(s) automatically populated on your CSA Report. (Beneficial Clients reported by your Principal Lobbyist(s) on their Statement of Registration(s) where you are listed as the Contractual Client.)* However, please be aware **at least one Beneficial Client must be listed on a CSA Report.**

NOTE: Removal of a **Beneficial Client** does **NOT** create an Amendment and/or Termination. Removing a **Beneficial Client** from a CSA Report has no impact on any associated Filings. If your relationship has terminated, you must submit a Termination.

Beneficial Client(s) RBR & SoF Section in LA

➤ **Reportable Business Relationship Information (if applicable)**

An RBR is required to be disclosed **if** a Beneficial Client has at least one active lobbying relationship in a calendar year, **and** has a business relationship with a State Person, or an Entity in which a State Person has the Requisite Involvement, at any time during that calendar year.

If the Beneficial Client already submitted a Reportable Business Relationship Report, the form confirmation number '**BRO...**' will display. If the Beneficial Client has yet to complete a Reportable Business Relationship Report, either '**No RBR Attached**' or '**See Business Relationships Tab**' will display.

For Contractual Clients who have a Reportable Business Relationship to disclose, please see the '**Reportable Business Relationship Information**' section.

➤ **Source of Funding Information**

Every Beneficial Client is required to either: (1) Disclose Source(s) of Funding ('SoF'); or (2) Indicate SoF reporting is **not** required. The SoF information will attach to every active CSA Report (including amended versions) submitted by the affiliated Contractual Client during the applicable Reporting Period.

If you are acting as **both** the Contractual Client **and** Beneficial Client, you will be required to fill-out your SoF form at this time by selecting the green '**Start SoF**' button next to your name. Any information already filled-out in your CSA will be saved. When you have completed your SoF form, you will be returned to your CSA to complete the remainder of information.

- Data disclosed on your Organization Profile (Organization name, contact information, etc.) will automatically populate information to your SoF form.

If the Beneficial Client already submitted a SoF, the form confirmation number 'SFO...' will display. If the Beneficial Client has yet to complete their SoF, 'No SoF Attached' will display.

See 'Source of Funding Information' guidance instructions available on the Commission's website for more information.

Principal Lobbyist Information for the Specified Reporting Period*

If you are a Contractual Client who lobbies on your own behalf **AND/OR** utilizes the services of any Retained Lobbyist(s), certain information reported on Filings submitted during the corresponding six-month Reporting Period will automatically populate your CSA Report:

- The name(s) of each Principal Lobbyist who has listed you as a Contractual Client on a Statement of Registration;
- The names of all Beneficial Client(s) reported by your Principal Lobbyist(s) on their Registration(s);
- Information disclosed in your Employed Lobbyist's applicable Bi-monthly Reports submitted during the corresponding six-month CSA reporting period (Employed Lobbyist names, Compensation, Expenses, Level of Government, and Lobbying Activities). **NOTE:** There are no Reimbursed Expenses for *Employed Lobbyist(s)*.

NOTE: You should **NOT** remove a Principal Lobbyist from your Client Semi-Annual Report unless your relationship terminated prior to the CSA Reporting Period.

➤ **You can add a new Principal Lobbyist(s) directly to a CSA Report by either:**

- (1) entering the first few characters of the 'Principal Lobbyist' name in the text search box to select an Organization who has an existing Profile in LA; **OR**
- (2) saving your CSA Report and then creating a 'placeholder' Organization Profile for each Principal Lobbyist you wish to add. (*Refer to page 7 of 'Step 3: How to Claim or Create Lobbyist or Client Organization Profiles'* on the Commission's website).

NOTE: If you add new Principal Lobbyist(s) directly to your CSA Report, you may also be required to amend associated Filings to add the Principal Lobbyist(s).

➤ **When creating a 'placeholder' Organization Profile, you will be required to provide the following information:**

- Principal Lobbyist Business Name:** The **Organization Name** (including Structured Coalitions and Public Corporations)
- Principal Lobbyist Business Address, Phone Number, Email Address:** The address, phone **number**, and email address of the Principal Lobbyist's place of business.

Additional information you are required to provide after a new Principal Lobbyist is added to your CSA Report:

1. **Type of Lobbying Relationship between the Lobbyist and the Contractual Client**

- **Employed** – Select if you use employee(s) to lobby on behalf of the Organization
- **Retained** – Select if you engaged (retained) a person or Organization to lobby for your benefit

2. **Level of Government Lobbied** by your Principal Lobbyist during this Reporting Period

- State Lobbying
- Municipal Lobbying
- State/Municipal (Both)

3. **Principal Lobbyist ‘Start Date’**

When entering a **new** Principal Lobbyist on your CSA (the PL was not pre-populated on your CSA), you must provide the date (the “first day”) your Principal Lobbyist was authorized to lobby on behalf of the Contractual Client.

➤ **You can remove a Principal Lobbyist (s) from a CSA Report**

Select the red and white circle ‘X’ icon located to the right of the name of the Organization you wish to remove. If you accidentally remove a Principal Lobbyist in error you will need to discard the saved filing and start again for the name to re-appear, or contact the Commission and staff will be able to add the Principal Lobbyist name back for you.

NOTE: Removal of a **Principal Lobbyist** does **NOT** create an Amendment and/or Termination. Removing a **Principal Lobbyist** from a CSA Report has no impact on any associated Filings. If your relationship has terminated, you must submit a Termination.

Level of Government, Compensation, and Reimbursed Expense Information for each Retained Lobbyist listed on the CSA*

Compensation and Reimbursed Expenses for Retained Lobbyists must be disclosed during the reporting period in which they are expended, received or incurred.

All Compensation and Expenses associated with Lobbying Activity should be accounted for using accrual basis accounting, i.e., costs are reported in the period in which they are incurred.

For purposes of calculating total Compensation and Expenses received, expended or incurred by a Lobbyist or Client, the \$5,000 annual threshold shall be computed cumulatively for all Lobbying Activities undertaken by the Lobbyist or Client (whether as a Beneficial Client or Contractual Client).

NOTE: For Contractual Clients who lobby on their own behalf - the Level of Government and Compensation Amount will automatically populate your CSA from information disclosed in your Bi-monthly Reports (and applicable amendments). **Please be aware** you will be

required to disclose this information if you add a **new Employed Lobbyist** to your CSA Report.

➤ **Level of Government**

Indicate the '**Level of Government**' Lobbied by your Principal Lobbyist during this Reporting Period.

- State Lobbying
- Municipal Lobbying
- State/Municipal (Both)

➤ **Compensation**

Compensation is all direct or indirect payments of salaries or other things of value provided to a Lobbyist in exchange for Lobbying or services that are otherwise in furtherance of Lobbying Activity, including year-end or other bonuses but not fringe benefits.

NOTE: A Member who retains a Lobbyist on behalf of an Unstructured Coalition must disclose the total amount paid to the Retained Lobbyist (whether it came from pooled Coalition funds, the Member, or some combination thereof) as Compensation and then also list it in the 'Expense Section' of the CSA Report. Refer to the Coalition guidance document entitled ***Coalition Filing Requirements*** for detailed guidance on Lobbying Activities involving Coalitions.

➤ **Reimbursed Expense(s)**

The aggregated dollar amount reimbursed to the Lobbyist (regardless of the value of any individual Expense) in connection with a Lobbying Activity, excluding Lobbyist Compensation.

NOTE: The Reimbursed Expense Total must be \$0 if there are no Lobbying Expenses disclosed in the Expense Section.

Lobbying Expenses (Summary of Client Expenses for the Reporting Period)*

An Expense is any cost of Lobbying Activity that is **not** Compensation paid to a Lobbyist and that is incurred by or reimbursed in connection with a Lobbying Activity.

Expenses must be disclosed during the reporting period in which they are expended, received or incurred.

Expense Types required to be reported on a Filing include:

1. **Aggregated** – Expenses of \$75 or less may be reported as a single aggregated total dollar amount.

2. **Salaries of non-Lobbying staff** (aggregated) – Compensation paid to those professional and clerical employees who do not engage in Direct or Grassroots Lobbying Activity.
3. **Itemized** – Expenses valued at more than \$75 must be itemized and include the payee, and nature and value of the expense.

➤ **Itemized Expenses**

Any **Reportable Expense** valued at more than \$75 must be fully identified on CSA Reports and must include the name of the person or entity to whom it was paid, the date of the Expense, as well as the purpose for which it was paid.

If applicable, you may select the checkbox **labeled ‘Check here if you have no itemized expenses to report for this period’**.

Information required when reporting Itemized Expenses valued at more than \$75.

1. **Name of Organization or Individual** the Expense was paid to
2. **Date of the Expense** (any date within the Client Semi-Annual reporting period)
3. **Total** (Dollar amount) of the Itemized Expense
4. **Expense Purpose** – when to use
 - **Advertising – Billboards**
Expenses related to purchasing and maintaining a billboard advertisement.
 - **Advertising – Consulting**
Expenses related to hiring a consultant for the purpose of using their expertise in evaluating advertising, public relations, communications and/or marketing goals.
 - **Advertising – Design Services for Media Buy**
Expenses related to hiring and utilizing the services of a graphic designer.
 - **Advertising – Flyers/Posters**
Expenses related to staff time spent creating, designing, purchasing, and printing flyers and posters.
 - **Advertising – Media Relations and Strategy**
Expenses related to the analysis of specific advertising goals for the purpose of developing a targeted media relations strategy related to Lobbying or advocacy efforts.
 - **Advertising – Multi-Platform Media Buy (Print, Online, TV, Web)**

Expenses related to purchasing advertisements that include multiple platforms such as print, television, and online advertising. (*i.e.* purchasing an advertisement in the Times Union print newspaper and online web edition).

- **Advertising – Newspaper Inserts**
Expenses related to the design, development (including staff time), and market research related to the purchase and distribution of newspaper inserts.
- **Advertising – Print Media/Publishing fees over \$500**
Expenses related to printing and publishing materials for advertising that is more than \$500.
- **Advertising – Social Media Platforms (Facebook, Twitter, Instagram, etc.)**
Expenses related to the design and execution of advertisements posted to Social Media accounts including but not limited to Facebook, Twitter, Instagram, etc.
- **Advertising – Television**
Expenses related to airing advertisements on television stations/channels.
- **Advocacy – Civic Engagement/Community Organizing**
Expenses related to staff time preparing a Community event where lobbying activity will occur.
- **Advocacy – Email marketing/Email blasts**
Expenses related to the design, purchase of software applications/licenses, development and target audience research related to email marketing and mass emails.
- **Advocacy – Legislative Bill Tracking**
Expenses related to subscriptions fees or hiring law firms to track legislative bills on search engines such as: Legislative Retrieval System (LRS), and State Watch.
- **Advocacy – Legislative Research**
Expenses related to subscriptions to legal search engines such as West Group or Lexis, POLITICO or hiring law firms to conduct Legislative Research.
- **Advocacy – Mass Mailings/Bulk Mailing**
Expenses related to the purchase of supplies and staff time spent developing and preparing mass/bulk mailings.
- **Advocacy – Phone Advocacy**
Expenses related to organizing, paying staff/volunteers, phone equipment and service fees related to phone advocacy efforts.

- **Advocacy – Postage over \$500**
Expenses related to postage and mailing items valued more than \$500.
- **Advocacy – Technology (cellphones, iPad, hotspots)**
Expenses related to purchasing devices, data plans, and internet services/personal hotspots to be used specifically for Lobbying Activities.
- **Reimbursement to Lobbyist – Only used when multiple expenses are submitted and purpose is unknown**
- **Social Event – Booth Rentals/Meeting Space Fees**
Expenses related to renting a conference space and/or booth table for a Lobby Day or other social event.
- **Social Event – Buses/transportation for Lobby Day**
Expenses related to transportation (bus, train, rental cars) of volunteers and staff members but NOT LOBBYISTS to a Lobby Day or other social event.
- **Social Event – Catering/Meals for Lobby Day**
Expenses related to supplying food for attendees of a Lobby Day.
- **Social Event – Civic Engagement/Community Organizing**
Expenses related to staff time planning and preparing for a Lobby Day or other social event.
- **Social Event – Consulting**
Expenses related to hiring an event planner or organizer for Lobby Day or other social event.
- **Social Event – Equipment and A/V Rentals**
Expenses related to the rental and usage of technology and audio-visual equipment for a Lobby Day or other social event.
- **Social Event – Event Sponsorship**
Expenses related to the act of supporting an individual, organization or event financially for the purpose of creating exposure to a brand or set of issues, access to attendee information, and/or speaking opportunities.
- **Social Event – Lodging**
Expenses related to hotel reservations and accommodations for staff and volunteers who attend a Lobby Day or other social event.
- **Social Event – Parking fees**

Expenses related to fees for parking for a Lobby Day or other social event.

- **Social Event – Print fees over \$500**
Expenses related to printing of name badges, and informational materials/pamphlets distributed at a Lobby Day or other social event.
- **Social Event – Promotional Materials**
Expenses related to the creation and purchase of materials used to promote an Organizations message during a Lobby Day or other social event, such as shirts, hats, mugs, pencils and stress balls.
- **Social Event – Rallies**
Expenses related to staff time for setting up and organizing a Rally.
- **Social Event – Reception/Banquet**
Expenses related to staff time organizing a reception, renting out the banquet space, and catering/food expenses.
- **Social Event – Rental Fees**
Expenses related to renting equipment such as microphones and tables for events such as a Lobby Day or other social event.
- **Social Event – Travel Reimbursement (Train, Airfare, Car, Hotel)**
Expenses related to reimbursing staff and or volunteers for travel expenses they paid for themselves.
- **Social Event – Volunteer Training**
Expenses related to organizing and holding training events for volunteers prior to an event, such as a Lobby Day or other social event.
- **Social Media – Media Relations and Strategy**
Expenses related to hiring an individual or company to establish and/or oversee an Organization’s social media presence.
- **Social Media – Online Advocacy (sponsored posts)**
Expenses related to search engine optimization and sponsoring, such as expenses incurred to create, or promote or place content on Social Media. This would also include the cost of hiring an individual to place content related to the Organization on the individual’s own Social Media accounts based on the individual’s popularity on Social Media (i.e. an “influencer”).

Expense Detail (if applicable)

If an Itemized Expense is **paid to an Organization** *on behalf of an Individual (or Individuals)*, an **Expense Detail** is required and must include the following information:

- Name of individual(s) (Multiple individuals can be added)
- Portion of Itemized Expense Amount that is attributed to the Individual listed

The Total (Dollar Amount) of the Itemized Expense paid to the Organization is the sum of each Individual's portion of the Itemized Expense when added together (Expense Detail A + B + C = Total (Dollar amount) of the Itemized Expense.)

➤ **How to Disclose an Expense Detail**

EXAMPLE: If Principal Lobbyist ABC Company paid an expense in the amount of \$300 to American Airlines (on behalf of Individuals affiliated to the Principal Lobbyist) during the January/February reporting period, the disclosure might look like this:

NAME OF ORGANIZATION: American Airlines
DATE OF THE EXPENSE: February 20, YEAR
TOTAL (Dollar amount) of the Itemized Expense: \$300
EXPENSE PURPOSE: Travel

EXPENSE DETAIL A

NAME OF INDIVIDUAL

Last Name: Smith
First Name: John
Middle [optional]

TITLE OF INDIVIDUAL: Lobbyist

AMOUNT OF EXPENSE THAT IS ATTRIBUTED TO THE INDIVIDUAL: \$100

EMPLOYER OF INDIVIDUAL: ABC Company

EXPENSE DETAIL B

NAME OF INDIVIDUAL

Last Name: Doe
First Name: Jane
Middle [optional]

TITLE OF INDIVIDUAL: Lobbyist

AMOUNT OF EXPENSE THAT IS ATTRIBUTED TO THE INDIVIDUAL: \$100

EMPLOYER OF INDIVIDUAL: ABC Company

EXPENSE DETAIL C

NAME OF INDIVIDUAL

Last Name: Smith
First Name: Peter
Middle [optional]

TITLE OF INDIVIDUAL: Lobbyist

AMOUNT OF EXPENSE THAT IS ATTRIBUTED TO THE INDIVIDUAL: \$100

EMPLOYER OF INDIVIDUAL: ABC Company

Unstructured Coalition Member Contributions (if applicable)

Members of Unstructured Coalitions must disclose their Contributions made to the Coalition in the 'Expense' section of their own Lobbying Reports (typically in their CSA Reports).

NOTE: A **Structured Coalition** that files as a Lobbyist or Client is **NOT** required to disclose Coalition Member Contributions on their CSA Report. Instead, the **Structured Coalition** must register and file Lobbying Reports as a "Coalition" ("Coalition" Profile Type). Like every other Lobbying Organization, the **Structured Coalition** must disclose all of its Lobbying Activity, and Reportable Compensation and Expenses related to the **Structured Coalition**.

*Refer to the Coalition guidance document entitled **Coalition Filing Requirements** for detailed guidance on Lobbying Activities involving Coalitions.*

Lobbying Subjects*

Lobbying Subjects identify the specific subject matter area(s) on which Lobbying occurred. These Subjects identify the 'Nature of Business' between the Lobbyist and Contractual Client.

At least one Lobbying Subject *is required* to be disclosed on each CSA Report.

Refer to APPENDIX A in this document and/or the Commission's website for the most up-to-date list.

Lobbying Activities*

Reportable "**Lobbying**" or "**Lobbying Activity**" is defined as any **Attempt to Influence** activity included in Section 1-c(c) of the Lobbying Act and includes both Direct Lobbying and Grassroots Lobbying.

The **actual** Lobbying Activities that occurred during the specific reporting period must be disclosed by identifying the Focus Type, the Focus (Identifying Number or Description), the Type of Lobbying Communication, and the Party(ies) Lobbied.

If **NO** Reportable "**Lobbying Activity**" was performed during the Reporting Period, you can select the checkbox to indicate such.

NOTE: The LA will automatically populate all Lobbying Activity information reported by your Employed Lobbyists on their Bi-monthly Reports. You CANNOT remove/edit these Lobbying Activities. You must submit an Amended Bi-monthly Report to change any Lobbying Activity information auto-populated from a Bi-monthly Report(s).

The LA offers you the opportunity to populate your CSA Report with all of the Lobbying Activities reported by your Retained Principal Lobbyist(s) on their Bi-monthly Reports (as of the submission date of the CSA). Select the “**Focuses Reported by Lobbyists**” sub tab on the Lobbying Activities tab, and select the check-box next to the Principal Lobbyist’s name. (You can select all check-boxes.)

NOTE: You are not required to use the Lobbying Activities reported by your Principal Lobbyist(s). However, the Commission recommends you utilize this feature since the CSA Report requires disclosure of the **actual** Lobbying Activities performed by your Principal Lobbyist(s) during the specific Reporting Period.

If your Retained Lobbyist submits a new and/or amends Lobbying Activity information **after it has been added to your CSA Report**, you are required to amend the associated CSA Report to reflect these changes since the Lobbying Activity information provided by the Lobbyist in their Bi-monthly Reports should match that disclosed in the CSA Report.

You can also manually data-enter Lobbying Activity information to your CSA Report by selecting the “**My Own Focuses**” sub tab on the Lobbying Activities tab.

A specific Lobbying Activity can be removed **after** it has been populated to your CSA. **NOTE:** An exception to this rule is Lobbying Activity information auto-populated from your Employed Lobbyist’s Bi-monthly Report(s). You must submit an Amended Bi-monthly Report to change any Lobbying Activity information auto-populated from your Bi-monthly Report(s).

NOTES:

- Removal of a Lobbying Activity from your CSA Report does not affect the information reported on your Principal Lobbyist’s Bi-monthly Report(s).)
- Any Amended Bi-monthly Report submitted by a Principal Lobbyist who lobbies on their own behalf (uses only Employed and/or Designated Lobbyists; and is therefore, not required to submit a CSA) will automatically generate an Amendment to the auto-generated CSA Report.

➤ **Information required when disclosing Lobbying Activities**

1. **Type of Lobbying Focus**

A *Focus Type* (State or Municipal Level) must be identified for each Focus number (such as the bill or procurement number), or brief description of the Focus area if the identifying number is unknown. Focus Types available for selection include:

- State Bill
- State Executive Order
- State Funding
- State Land Use

- State Permits/Licensing
- State Procurement
- State Regulation/Rate-making/Rule
- State Resolution
- State Tribal Compact Agreement - NYS Indian Nations
- Municipal Bill
- Municipal Executive Order
- Municipal Funding
- Municipal Land Use
- Municipal Ordinance
- Municipal Permits/Licensing
- Municipal Procurement
- Municipal Regulation/Rate-making-Rule
- Municipal Resolution

2. **Type of Communication**

A *Type of Communication* (Monitoring Only, Direct Lobbying, Grassroots Lobbying or Both) must be assigned to every Lobbying Focus disclosed. This includes Focuses where the identifying number is known, or a brief description of the Focus is provided.

- **Direct Lobbying**

Direct Lobbying is an attempt to influence a Lobbying Activity through Direct or Preliminary Contact with a Public Official, or through communication or interaction directed to a Public Official, or the Public Official's staff.

If '**Direct Lobbying**' is selected, you must disclose the name(s) of the '**Party(ies) Lobbied**' for that specific Focus.

- **Grassroots Lobbying**

Grassroots Lobbying is an attempt to influence a Public Official indirectly, or through a person or organization who solicits another to deliver a message to a Public Official.

If '**Grassroots Lobbying**' is selected, you must disclose the '**Government Body(ies)**' (State Agencies, Municipalities, or Legislative Bodies) Lobbied for that specific Focus.

- **Both (Direct and Grassroots Lobbying)**

If BOTH Direct and Grassroots Lobbying was performed, you must disclose the following information:

- **For Direct Lobbying** – identify the Parties (targets) of the Direct Contact (the name of a Public Official or Public Official's Office; OR Legislative Committee, etc.).

- **For Grassroots Lobbying** – identify the intended ‘targets’ of the Grassroots Lobbying Activity, which may be a person; state agency; municipality; or legislative body.

- **Monitoring Only**

If you have **not actually Lobbied a specific Party on a specific Focus**, you may select the ‘**Monitoring Only**’ check-box once the Focus has been added to your ‘**My Selected Focuses**’ section. You are not required to disclose the names of any ‘**Party(ies) Lobbied**’ for that specific Focus.

3. **Focuses**

The government activity on which Reportable "**Lobbying Activity**" occurred, which shall include the following, as known at the time of filing:

- bill, rule, regulation, rate number or brief description relative to the introduction or intended introduction of legislation or a resolution;
- the title and identifying numbers of Procurement Contracts/documents or a general description of the Procurement;
- the number or subject matter of an Executive Order of the Governor or Municipality; and
- the subject matter of and tribes involved in tribal-state compacts.

(a) Focus Number (identifying number, if known)

The identifying Focus number (such as a State and/or Municipal Bill, Rule, Regulation or Rate or Procurement Contract, Executive Order number, etc.) must be disclosed.

Identify Senate and Assembly Bills by entering a capital ‘S’ for a Senate Bill number, or a capital ‘A’ for an Assembly Bill number. *Do not add a space, hyphen, period, or other character between the capital letter and the bill number.* **Senate and Assembly Bills are the ONLY Focus Types that require special formatting rules for data entry.**

- **Correct:** A1234
- **Incorrect:** a1234; or a 1234; or A 1234; or A_1234

NOTE: If a State bill is amended, versions are denoted by a letter suffix A, B, C, D and so on for each time the bill is altered. Please ensure the letter at the end of the amended Bill number includes a dash before it.

- **Correct:** A1345-A
- **Incorrect:** a1234A; or a 1234a; or A 1234a; or A_1234A

Identify a Chapter Law by providing the complete title.

- **Correct:** Chapter 16 of the laws of 1971
- **Incorrect:** Chapter 16; **or** Laws of 1971

Identify a Procurement Contract by identifying the number.

- **Correct:** OER01-C11006MWBE-1120000

(b) Description of the Focus

If a Focus Number (identifying number) is **unknown**, a description of the Focus must be disclosed. The description must clearly communicate the Focus of the lobbying effort.

- **Correct:** Transportation Regulations that Impact Farmers Transporting Fresh Produce
- **Incorrect:** Transportation; **or** Transportation Regulations

Identify Municipal Level Focuses by providing the description and the specific municipality the Lobbying Activity is intended to impact.

- **Correct:** Municipal Bill regarding single stream recycling in the Town of Bethlehem , New York.
- **Incorrect:** Single stream recycling

(c) Information on Loading Multiple State or Municipal Bills

The LA offers Filers the ability to **upload multiple State and Municipal Bill numbers**.

Use commas to separate bill numbers. Each State Bill number (Senate and Assembly) must be separated by a comma. Senate Bill numbers and Assembly Bill numbers do not need to be loaded separately.

- **Correct:** A1234,S1234,A4567,A8790,S2345

Once you have added your Focuses, they will be added to the **'My Focuses'** section of your Filing.

4. **Parties Lobbied**

The target(s) of the Reportable **"Lobbying Activity"**, including the person, organization, entity, or legislative body before which the Lobbyist Lobbied.

The direct connection (one-to-one relationship) between the Focus and the target(s) (referred to as 'Parties Lobbied') of any reportable **"Lobbying Activity"** must be identified. For the 2021 biennial period, **you can no longer create a new Party Name in LA.**

Identifying a Specific Group of Parties related to a Focus

If you sent a communication to a *group of Parties* regarding a specific Focus, the following options are available in the ‘Party’ field (so you do not have to select every Individual):

- A communication sent to entire Senate
- A communication sent to entire Assembly
- A communication sent to entire Legislature
- A communication sent to all NYC Council Members
- A communication sent to all [Specific County] Legislators

Otherwise, you must identify the name(s) of the specific Senator/Assembly person you directly lobbied. For your convenience, every State Legislator’s name is included in the ‘Party Name’ field. **Identify and select Senate and Assembly members by:**

- entering the first few characters of the ‘Party Name’ in the text search box
- or**
- typing the asterisk symbol (*) in the search field to view the Commission’s comprehensive list

Certain ‘Party Names’, when selected from the LA Database, will require Filers to include additional information.

This most often occurs when you lobby a State or Municipal Agency. Additional information, when required, can be disclosed by data-entering the information in **either** of the two categories provided:

1. Unit, Division, or Department Lobbied*; **OR**
2. First Name/Last Name or Title of Person Lobbied

NOTE: You are NOT required to disclose information in BOTH categories; but you are also not prohibited from disclosing information in BOTH categories *if known*.

For more detailed instructions on how to disclose Parties Lobbied on the CSA Report please reference the ‘How to File a Client Semi Annual Report in LA’ and the Commission’s updated document, How to Properly File Lobbying Activities, for EXAMPLES of ‘how’ to disclose additional information related to an EXISTING Party Name in LA.

➤ **Government Bodies associated to Parties Lobbied:**

Every ‘Party’ name listed in the LA Database contains two components: the main ‘Party’ name and the ‘Government Body’. Below is a list of all government bodies represented in LA.

- Senate Committee
- Assembly Committee

- State Agency
- NYS Assembly
- NYS Senate
- Executive Chamber
- NYS School Districts
- State and Local Public Authorities and Local Development Corporations
- NYC Council Members and ‘Communications sent to all [specific County] Legislators’
- Industrial Development Agency
- Village
- Town
- City
- County
- Improvement/Special Districts
 - County Special District
 - Town Special District
 - Consolidated Health District
 - Fire District
 - Independent Special District

Business Relationship Information (if applicable)

An RBR is required to be disclosed if a Contractual or Beneficial Client has at least one active lobbying relationship in a calendar year, and has a business relationship with a State Person, or an Entity in which a State Person has the Requisite Involvement, at any time during that calendar year.

PLEASE NOTE: If a Filer is both a Lobbyist and a Client, the RBR should be filed as part of the Statement of Registration.

If you (as the Contractual or Beneficial Client) previously submitted a Reportable Business Relationship Report, the RBR form will populate to this Section of your Filing (if the CSA is required) and the form confirmation number ‘**BRO...**’ will display.

If you have not yet submitted any RBR forms, you must indicate whether a Reportable Business Relationship exists during this Calendar Year by selecting either ‘**Yes**’ or ‘**No**’ from the drop-down menu.

You can disclose a new RBR by selecting the ‘**Create New RBR**’ button. You can also amend your previously submitted RBR form by selecting the ‘**pencil**’ icon in the Action column next to the RBR form.

You will be required to fill-out your RBR form at this time. Any information already filled-out in your CSA Report will be saved. When you have completed your RBR form, you will be returned to your CSA Report to complete the remainder of information.

Attestation Information*

An Attestation is required before any Filing can be submitted. By attesting, the Filer acknowledges that the information (provided by the Filer) in all statements and reports required under Legislative Law Article 1-A is true, correct and complete to the best knowledge and belief of the signor under penalty of perjury. (See Section 1-p of the Lobbying Act)

Payment Information*

Once you 'Submit' your CSA Report, you will be directed to the Payment Portal. Your CSA will remain in 'Saved Status' until the payment portion is completed.

The following payment options are available:

- (a) **Remit payment via Online Lobbying Application** with Visa, MasterCard, American Express or Discover. Payment must be made **at the time of submission.** *

NOTE: For security purposes, the LA will only permit two attempts to pay your filing fee by credit card. After the second failed attempt, you will be required to pay by check or money order.

- (b) **Check/Money Order.** You may indicate payment will be made by submitting a check or money order. You must provide your check or money order number in the appropriate field of the online form.

Please make all checks payable to the **Commission on Ethics & Lobbying in Government (NYS)** and include the Filing Confirmation number in the memo section.

Mail your check to:

New York State Commission on Ethics and Lobbying in Government
540 Broadway
Albany, NY 12207

CLIENT SEMI-ANNUAL REPORT AMENDMENTS – WHEN TO FILE

Contractual Clients are required to submit an amended CSA Report for any change, permanent or temporary, to the information noted below during the specified reporting period, which should be completed and submitted to the Commission **within 10 days of such change.**

Each Amended CSA Report requires the Filer to provide a specific date the change(s) are effective; known as an **"Effective Date of Change"**. Multiple changes can be made on an Amended CSA Report **as long as the changes being made on the Filing have the same "Effective Date of Change"**. Otherwise, separate Amendments are required for each Effective Date of Change.

Amended CSA Reports can be submitted at any time during the calendar year regardless of whether the original CSA Report or other Amended CSA Reports are pending, as long as the **"Effective Date of Change"** is within the same reporting period as the CSA Report being Amended.

Amended CSA Report Effective Date

An Amended CSA Report “**Effective Date of Change**” is the date a specific change (or changes) takes effect; **not the date the Amendment is submitted**.

An Amended CSA can be completed and filed *after* a **Termination End Date**, as long as the contract was “active” during the Reporting Period of the CSA being amended.

All information will pre-populate from your Profile and most recently submitted CSA, Amended CSA Report(s).

An Amended CSA is required to reflect any changes to:

1. Principal Lobbyist Information

You can add *new* Principal Lobbyists directly to an Amended CSA Report (*Individuals/Organizations who were **NOT** populated on the CSA Report*).

NOTE: An Amendment to add a *new* Principal Lobbyist requires **two** Effective Dates.

Principal Lobbyist Effective Date

The Principal Lobbyist’s “**Effective Date**” is the earliest date that Individual/Organization was authorized to engage in Lobbying Activities on behalf of the Contractual Client.

Amendment Effective Date of Change

The Amendment “**Effective Date of Change**” is the date the change(s) are (or will be) effective.

2. Beneficial Client Information

You can make changes (additions/deletions) to Beneficial Client information on an Amended CSA Report.

3. Amounts and/or information relating to:

- Compensation
- Reimbursed Expenses
- Expenses
- Unstructured Coalition Member Contributions

NOTE: Any decision to waive, write down or otherwise reduce Compensation and Expenses owed to a Lobbyist by a Client after the Contract Termination of a Lobbying Agreement does not require an Amendment.

4. Lobbying Activities:

Since the CSA Report requires disclosure of the *actual* Lobbying Activities that occurred during the specific Reporting Period (including the direct relationships that exist between a Focus and Party(ies) Lobbied), **an Amended CSA Report is required if any of the information reported in the original CSA was inaccurate or changes.**

If your Retained Lobbyist submits new and/or amends Lobbying Activity information **after it has been added to your CSA Report**, you are required to amend the associated CSA Report to reflect these changes since the Lobbying Activity information provided by the Lobbyist in their Bi-monthly Reports should match that disclosed in the CSA Report.

NOTE: Any amendments by a Principal Lobbyist (who lobbies on its own behalf, uses only Employed and/or Designated Lobbyist and is, therefore, not required to submit a CSA) to Bi-monthly Reports used to auto-generate a CSA will automatically generate an amendment to the auto-generated CSA.

TICKETING IN THE NEW LOBBYING APPLICATION

The LA provides for a mechanism of communication between the Filer and the Commission staff, facilitating filing issue awareness and deficiency resolution through a system of Ticketing. Tickets may be generated by Staff to address a specific issue, or in some cases, auto-generated by the Lobbying Application. Tickets will appear on your dashboard in the online application.

APPENDIX A

LOBBYING SUBJECTS

Refer to the Commission's website for the most up-to-date list.

1. Agribusiness – General
2. Agribusiness – Agricultural Services & Products
3. Agribusiness – Food Processing & Sales
4. Agribusiness – Tobacco
5. Budget/Appropriations
6. Cannabis/Marijuana
7. Chemicals/Chemical Industry
8. Construction – General
9. Construction – Building Materials & Equipment
10. Construction – Construction Services
11. Consumer Issues/Safety/Protection
12. Criminal Justice – General
13. Criminal Justice – Criminal Law & Procedures (includes sentencing)
14. Criminal Justice – Law Enforcement
15. Criminal Justice – Police Issues
16. Corrections
17. Economic Development – General
18. Economic Development – Tourism
19. Economic Development – Sports/Entertainment
20. Economic Development – Tax Incentives
21. Education – General
22. Education – Testing
23. Education – Funding
24. Education – Charter Schools
25. Education – Evaluations
26. Energy & Natural Resources – General
27. Energy & Natural Resources – Alternative Energy Production & Services
28. Energy & Natural Resources – Oil/Fuel/Gas
29. Energy & Natural Resources – Waste Management
30. Energy & Natural Resources – Environmental Conservation/Preservation
31. Energy & Natural Resources – Parks & Recreational Activities
33. Ethics Laws and Regulations
34. Finance, Insurance & Financial Services – General
35. Finance, Insurance & Financial Services – Commercial Banks & Credit Unions
36. Finance, Insurance & Financial Services – Finance & Credit Companies
37. Finance, Insurance & Financial Services – Mortgage Finance
38. Finance, Insurance & Financial Services – Securities & Investment

39. Gaming – General
40. Gaming – Casinos
41. Gaming – Horse Racing
42. Gaming – Lottery
43. Gaming – Recreation & Live Entertainment
44. Health – General
45. Health – Health Professions
46. Health – Health Services / HMOs
47. Health – Hospitals & Nursing Homes
48. Health – Pharmaceuticals/ Health Products
49. Health – Medicine/ Medicaid
50. Health – Cigarette/ Tobacco
51. Human Rights/Civil Rights
52. Insurance – General
53. Insurance – Auto
54. Insurance – Health
55. Insurance – Life
56. Insurance – Property & Casualty
57. Labor – General
58. Labor – Labor Issues/ Unions
59. Labor – Prevailing wage/ Minimum Wage
60. Labor – Pensions/ Retirement
61. Lobbying Laws and Regulations
62. Media – General
63. Media – Printing & Publishing
64. Media – Books, Magazines & Newspapers
65. Media – Motion Picture/Television/Recorded Music/Music Production & Distribution
66. Media – First Amendment – Press
67. Miscellaneous Business – General
68. Miscellaneous Business – Advertising/ Public Relations
69. Public Utilities – General
70. Public Utilities – Telecommunications
71. Public Utilities – Cable/Broadband
72. Public Utilities – Water
73. Public Utilities – Gas
74. Public Utilities – Electric
75. Real Estate – General
76. Real Estate – Affordable Housing
77. Real Estate – Construction
78. Tax – General
79. Tax – Corporate
80. Tax – Exempt Organizations
81. Tax – Personal Income

- 82. Tax – Real Property
- 83. Tax – School
- 84. Tax – Development Credits
- 85. Transportation – General
- 86. Transportation – Mass Transit
- 87. Transportation– Railroad/Canals
- 88. Transportation – Safety
- 89. Transportation – Trucking
- 90. Transportation – Air Transport
- 91. Transportation – Automotive Industry/ Manufacturers
- 92. Veterans Affairs