

POLICY ALERT



SEMI-ANNUAL CONTRIBUTION REPORTING SYSTEM AVAILABLE

The Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate released the Semi-Annual Contribution Reporting System on June 30, 2008. Beginning January 1, 2008, registered lobbyists and registrants under the Lobbying Disclosure Act (LDA) are required to file a semi-annual report (LD-203) disclosing payments and contributions and certifying compliance with the Rules of the House and Senate. The LD-203 must be filed every six months, even if no contributions or payments have been made, until a lobbyist or a registrant terminates their registration. The first of these reports is due Wednesday, July 30, 2008, and covers any payments and contributions made from January 1 through June 30.

ACCESSING THE ONLINE CONTRIBUTION REPORTING SYSTEM

All organizations currently registered (registrants) under the LDA have access to the online reporting system available at <https://ld.congress.gov:4433/LC/> by using their existing Senate ID number (numbers preceding the hyphen) and electronic filing password. When a registered entity signs into the system, they will notice that there is a menu option called "Manage Lobbyists." Registrants must click on the "Manage Lobbyists" tab and verify the registered lobbyists' names before an account can be created for each lobbyist. When a lobbyist's name has been verified by the registrant, the lobbyist will be notified via e-mail and prompted to create a unique password for their account before they can sign into the system.

FILING LD-203 REPORTS

Registrants and lobbyists will notice upon signing into the online filing system, that there is a menu option titled "File LD-203 Report." This option allows registrants and lobbyists to follow a step-by-step process that generates the LD-203 report. There are four sections beginning with selection of the reporting period and verification of the name of the entity. Second, the system asks for a listing of all affiliated political action committees (PAC) and then asks the filer for a list of contributions made during the reporting period. Before submitting the form electronically, the filer must check a box verifying that the statement below is accurate:

I certify that I have read and am familiar with the provisions of the Standing Rules of the Senate and the Rules of the House of Representatives relating to the provision of gifts and travel. I have not provided, requested, or directed a gift, including travel, to a Member of Congress or an officer or employee of either House of Congress with knowledge that receipt of the gift would violate rule XXXV of the Standing Rules of the Senate or rule XXV of the Rules of the House of Representatives during this filing period.

The filer then electronically “signs” the generated report using the password he or she used upon signing into the LD-203 online reporting system.

DISCLOSURE OF CERTAIN CONTRIBUTIONS

The information required in the contribution category is broken down into four contribution categories described in detail below. For each contribution, the filer must provide the date the contribution was made, the amount, payee name and honoree name.

1. FECA

This category covers political contributions regulated by the Federal Election Campaign Act and includes funds contributed to any federal candidate or officeholder, leadership PAC, or political party committee that equals or exceeds, in the aggregate, \$200. Please note that a lobbyist’s contributions to his or her company’s PAC do not have to be disclosed on his or her report.

2. Honorary Expenses

This category includes funds paid for the following types of events—

- funds paid for an event to honor or recognize a covered legislative branch or executive branch official
- funds paid to an entity or person that is named for a covered legislative branch official, or to an entity or person in recognition of such official
- funds paid to an entity established, financed, maintained or controlled by a covered legislative branch or executive branch official, or to an entity designated by such official
- funds paid to Presidential inaugural committees.

3. Meeting Expenses

This includes funds paid for a meeting, conference, retreat or other similar event held by, or in the name of, one or more covered legislative branch or executive branch officials. This would include payments made by a corporation to pay for events or appearances by candidates and covered officials before its restricted class. This would also include payments for bagels, coffee or other refreshments offered at meetings. The Secretary of the Senate has stated that “honoring” should be read expansively such that anytime there is an invitation issued for a covered official to attend, even if informally, the meeting should be treated as “honoring” that official for purposes of reporting.

4. Presidential Library Expenses

Included in this category are any funds paid to an entity or person that is intended to cover presidential library expenses.

CONTACT INFORMATION

If you have any questions about this alert, please contact:

Melissa L. Laurenza	202.887.4251	m Laurenza@akingump.com	Washington, D.C.
Carrie M. Hoback	202.416.5153	choback@akingump.com	Washington, D.C.
Kelly J. Eaton	202.887.4162	keaton@akingump.com	Washington, D.C.

Austin	Beijing	Dallas	Houston	London	Los Angeles	Moscow
New York	Philadelphia	San Antonio	San Francisco	Silicon Valley	Taipei	Washington, D.C.