



April 2021

2020 LOBBYING DISCLOSURE

Observations on Lobbyists' Compliance with Disclosure Requirements

Accessible Version



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-21-375](#), a report to congressional committees

Why GAO Did This Study

The LDA, as amended, requires lobbyists to file quarterly disclosure reports and semiannual reports on certain political contributions. The law also includes a provision for GAO to annually audit lobbyists' compliance with the LDA.

This report (1) determines the extent to which lobbyists can demonstrate compliance with disclosure requirements, (2) identifies challenges or potential improvements to compliance that lobbyists report, and (3) describes the efforts of USAO in enforcing LDA compliance. This is GAO's 14th annual report under the provision.

GAO reviewed a stratified random sample of 97 quarterly disclosure LD-2 reports filed for the third and fourth quarters of calendar year 2019 and the first and second quarters of calendar year 2020. GAO also reviewed two random samples totaling 160 LD-203 reports from year-end 2019 and midyear 2020.

This methodology allowed GAO to generalize to the population of 52,289 disclosure reports with \$5,000 or more in lobbying activity and 29,447 reports of federal political campaign contributions. GAO also interviewed USAO officials.

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

View [GAO-21-375](#). For more information, contact Yvonne D. Jones at (202) 512-2717 or jonesy@gao.gov.

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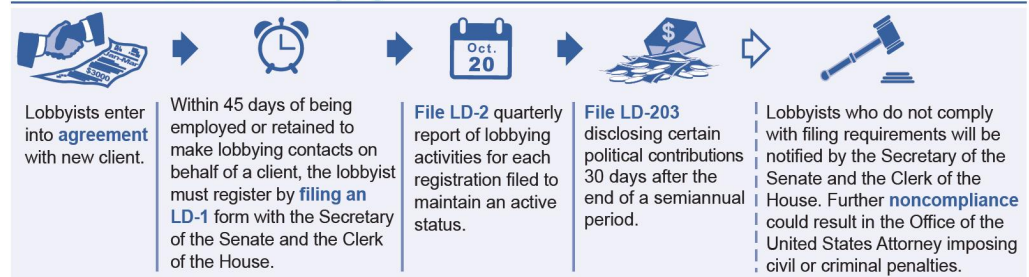
What GAO Found

For the 2020 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 contribution (LD-203) reports filed during the third and fourth quarters of 2019 and the first and second quarters of 2020, GAO estimates that

- 91 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);
- 99 percent of all lobbyists who filed could provide documentation for lobbying income and expenses;
- 29 percent of all LD-2 reports did not properly disclose one or more previously held covered positions as required; and
- 8 percent of LD-203 reports were missing reportable contributions.

These findings are generally consistent with GAO's findings since 2011. Under the Justice Against Corruption on K Street Act of 2018, lobbyists are required to report certain criminal convictions. GAO found that, of the 210 individual lobbyists in our sample, none failed to report a conviction.

Disclosure Process for Lobbying Firms



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. | GAO-21-375

GAO found that most lobbyists in a sample of 129 lobbyists 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 demonstrated compliance difficulties, such as failures to disclose covered positions or misreporting of income or expenses.

The U.S. Attorney's Office for the District of Columbia (USAO) tries to resolve noncompliance by having lobbyists file their reports, terminate their registrations, or by imposing civil and criminal penalties. USAO received 3,956 referrals from both the Secretary of the Senate and the Clerk of the House for failure to comply with reporting requirements cumulatively for years 2011 through 2020. Of the 3,956 referrals, about 36 percent are now compliant and about 63 percent are pending further action. The remaining 1 percent did not require action or were suspended because the lobbyist or client was no longer in business or the individual lobbyist was deceased.

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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
JACK Act	Justice Against Corruption on K Street Act of 2018
LDA	Lobbying Disclosure Act of 1995
USAO	U.S. Attorney's Office for the District of Columbia

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April 1, 2021

Congressional Committees

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 HLOGA 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 conduct an annual audit of the extent of lobbyists' compliance with the Lobbying Disclosure Act of 1995 (LDA), as amended by reviewing publicly available lobbying registrations and other matters.² This is our 14th report under this provision.³

As 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; 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 the efforts it has made to improve that enforcement.⁴

To determine the extent to which lobbyists can demonstrate compliance, we examined a stratified random sample of 97 quarterly lobbying disclosure (LD-2) reports with income or expenses of \$5,000 or more filed during the third and fourth quarters of calendar year 2019 and the first

¹Pub. L. No. 110-81, 121 Stat. 735 (Sept. 14, 2007), *codified at* 2 U.S.C. §§ 1601-1614. If the lobbyist is employed by a lobbying firm or other organization, the organization (rather than the individual lobbyist) is required to file some of these reports on behalf of the individual lobbyists.

²2 U.S.C. § 1614.

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

⁴For the purposes of our report, we use the term lobbyist to refer to individual lobbyists, lobbying firms (including self-employed individuals who are lobbyists), and organizations with in-house lobbyists, unless noted otherwise.

and second quarters of calendar year 2020.⁵ We selected the randomly sampled reports from the publicly downloadable database maintained by the Clerk of the House of Representatives.⁶ This methodology allows us to generalize some elements to the population of LD-2 reports. We then surveyed and interviewed each lobbyist who filed an LD-2 in our sample.⁷ Our questionnaire asked lobbyists about their income and expenses and accompanying supporting documentation.

In our follow-up interviews, we asked lobbyists 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 individual lobbyists listed in the report.

We reviewed this documentation to determine whether individual lobbyists listed on the LD-2 reports properly disclosed (1) prior covered official positions and (2) certain criminal convictions at the state or federal level as required by the Justice Against Corruption on K Street Act of

⁵Our original sample included 148 randomly selected LD-2 reports—25 reports per quarter and 12 additional reports for each quarter as alternates in case there were lower response rates due to the pandemic. After notification of our review, one lobbyist (with four reports selected) declined to participate and six lobbyists were non-responsive to requests for participation. We selected five alternates from the pool of additional reports and the remaining alternates were not used. Appendix I provides the complete list of lobbyists and clients for this report.

⁶Our 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 20 to 25 cases per quarter, to attain 80 to 100 completed cases each review.

⁷Although we contacted each lobbyist in our sample, we did not always meet with the individual lobbyists identified as the point of contact or with the individual lobbyists identified on the form. We often met with individuals representing the lobbyists in our sample.

2018.⁸ We also determined if the lobbyists filed the semiannual report of federal political contributions.

One lobbying firm in our sample, Townsend Public Affairs, declined to meet with us following our initial letters sent in July and September 2020 and follow up contacts in December 2020. We informed the firm that we would report its name to Congress, as provided for in HLOGA.⁹ Appendix I contains the 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 2019 and midyear 2020 semiannual political contributions (LD-203) reports. The samples contain 80 LD-203 reports that list contributions 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 the list of lobbyists we 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.¹⁰ 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 2019 and the

⁸Pub. L. No. 115-418, 131 Stat. 5440 (Jan. 3, 2019), *codified at* 2 U.S.C. §§ 1603(b)(7), 1604(b)(6). The act is also known as the JACK Act.

⁹2 U.S.C. § 1614(c).

¹⁰FEC is the independent regulatory agency charged with administering and enforcing federal campaign finance law, which covers three broad subjects: (1) public disclosure of funds raised and spent to influence federal elections; (2) restrictions on contributions and expenditures made to influence federal elections; and (3) the public financing of presidential campaigns. It has jurisdiction over the financing of campaigns for the U.S. House, Senate, presidency and the vice presidency. See <https://www.fec.gov/about/mission-and-history/>.

first and second quarters of 2020 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 about mechanisms to ensure validity, reliability, and consistency of data. We found the data to be sufficiently reliable for the purposes of our reporting objectives.

To identify challenges and potential improvements to compliance, we used a structured web-based survey to obtain views from lobbyists included in our sample of reports. In general, we asked lobbyists 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 issue area codes, and covered positions.

To describe the resources and authorities available to USAO and its 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.¹¹ A more detailed description of our methodology is provided in appendix III.

The mandate does not require us to identify lobbyists 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 April 2020 to April 2021 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.

¹¹When a lobbyist 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 may be in noncompliance. 2 U.S.C. § 1605(a)(8).

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),¹² and whose lobbying activities represent at least 20 percent of the time that he or she spends on behalf of the client during the quarter.¹³ Lobbying firms are persons or entities that have one or more employees who are lobbyists on behalf of a client other than that person or entity.¹⁴

The LDA requires lobbyists to register new clients with the Secretary of the Senate and the Clerk of the House and to file quarterly reports for each client disclosing their respective lobbying activities.¹⁵ 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 web portal. 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

¹²The 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)

¹³2 U.S.C. § 1602(10).

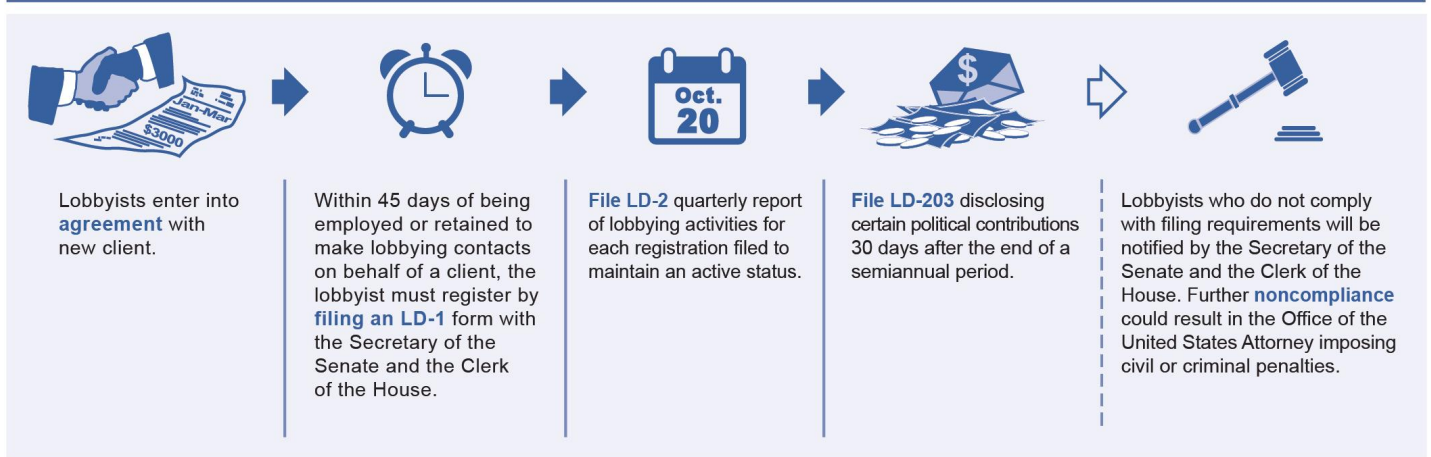
¹⁴2 U.S.C. § 1602(9).

¹⁵If an organization has one or more employees who are lobbyists, the organization is required to file a single registration for each client for whom the employees act as lobbyists. 2 U.S.C. § 1603 (a)(2).

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.

Figure 1: Lobbying Disclosure Process

Disclosure Process for Lobbying Firms



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. | GAO-21-375

Lobbyists are required to register with the Secretary of the Senate and the Clerk of the House for each client if the lobbyists receive or expect to receive more than \$3,000 in income in a quarterly period from that client for lobbying activities.¹⁶ 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;

¹⁶If an individual lobbyist is employed by a lobbying firm, the firm (rather than the individual lobbyist) is required to file the registration on behalf of the employees who are lobbyists. The \$3,000 threshold applies to total income related to lobbying activities on behalf of a client. Organizations employing in-house lobbyists to engage in lobbying activities on their behalf are required to file only one registration. An organization employing in-house lobbyists is exempt from filing if total expenses in connection with lobbying activities are not expected to exceed \$13,000 during a quarterly period. Amounts are adjusted for inflation and published in LDA guidance.

- a list of individuals who acted as lobbyists on behalf of the client during the reporting period;
- whether any individual lobbyist listed 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;
- 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 also 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 lobbyist who has filed a registration and by each individual lobbyist listed on an LD-2 report. The lobbyists must

- list the name of each federal candidate or officeholder, leadership political action committee, or political party committee to which they 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.

In January 2019, the Justice Against Corruption on K Street Act of 2018 (also known as the JACK Act) was enacted.¹⁷ The JACK Act amends the Lobbying Disclosure Act of 1995 and requires that lobbyists disclose in their registrations and quarterly disclosure reports whether individual lobbyists have been convicted of certain criminal acts at the state or federal level. Specifically, the act requires that, for any listed individual lobbyist who has been convicted of an offense involving bribery, extortion, embezzlement, an illegal kickback, tax evasion, fraud, a conflict of interest, making a false statement, perjury, or money laundering, the lobbyist is required to provide the date of conviction and a description of the offense in the lobbying registration and in subsequent quarterly reports.

The LDA 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.

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 e-mail registered lobbyists quarterly about common compliance issues and to provide 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 in writing when 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, requesting that they file reports or terminate their

¹⁷Pub. L. No. 115-418.

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.

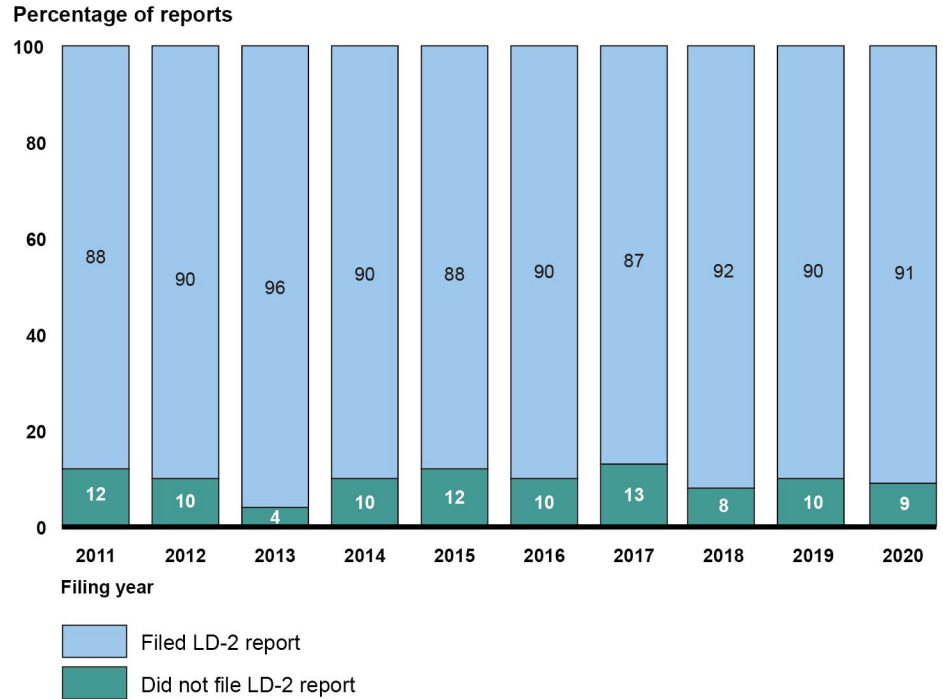
Lobbyists Filed Disclosure Reports as Required for Most New Lobbying Registrations

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 filing an LD-1 form with the Secretary of the Senate and the Clerk of the House.¹⁸ Thereafter, the lobbyist must file quarterly disclosure (LD-2) reports detailing the lobbying activities. Of the 4,182 new registrations we identified for the third and fourth quarters of 2019 and the first and second quarters of 2020, we matched 3,798 of them (91 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 2011 through 2020.

¹⁸ Where an organization uses its own employees to lobby on behalf of the organization, the requirement to register is triggered once an employee makes a second lobbying contact (thereby satisfying the definition of a “lobbyist” at 2 U.S.C. § 1602(10)). Registration is required within 45 days of the second contact. 2 U.S.C. § 1603(a)(1).

Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure Reports, 2011 through 2020



Source: GAO analysis. | GAO-21-375

As part of their regular enforcement procedures, the Clerk of the House and Secretary of the Senate are to follow up with newly filed registrations if 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.

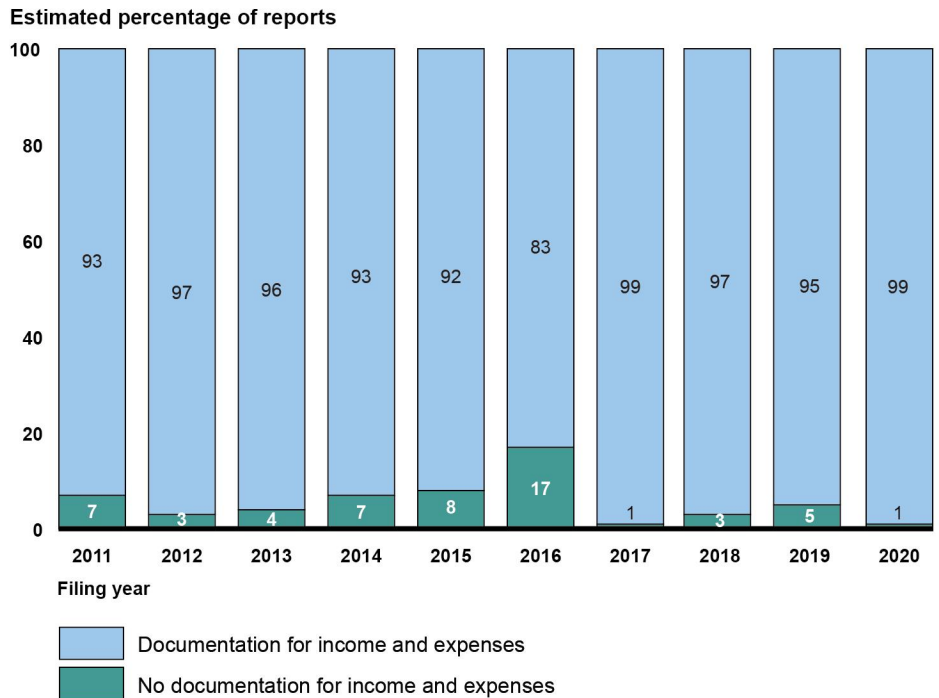
For Most LD-2 Reports, Lobbyists Provided Documentation for Key Elements, including Documentation for Their Income and Expenses

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.¹⁹ Most lobbyists reporting \$5,000 or more in

¹⁹To assess the statistical significance of change over time, we used statistical tests that adjusted for multiple comparisons across the 10 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.

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 2011 through 2020. Our 2020 estimate does not represent a statistically significant change from 2019.²⁰

Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure Reports with Documentation for Income and Expenses, 2011 through 2020



Source: GAO analysis. | GAO-21-375

Note: Estimated percentages have a margin of error of 10 percentage points or fewer.

Figure 4 shows that in 2020, 3 percent of lobbyists' income or expenses reported on their LD-2 differed from the amounts submitted to us on their

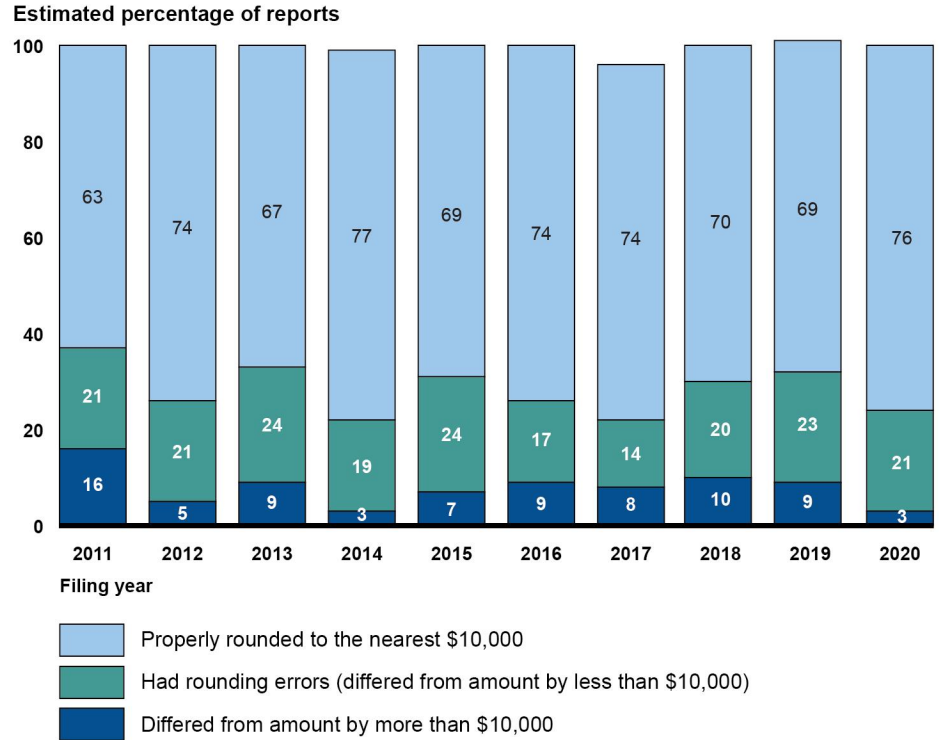
²⁰However, in recent years, our findings showed some variation in the estimated percentage of lobbyists who have reports with documentation for income and expenses supporting lobbying activities. Specifically, our estimate for 2017 (99 percent) represented a statistically significant increase from 2016 (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.

supporting documentation by \$10,000 or more, a 6 percentage point decrease from 2019. Additionally, for some LD-2 reports, lobbyists did not round their income or expenses as the law requires.²¹ For 2020, we estimated that 21 percent of reports did not round reported income or expenses. We have found that rounding difficulties have been a recurring issue on LD-2 reports from 2011 through 2020.²² In 2016, the guidance was updated to include an additional example about rounding expenses to the nearest \$10,000.

²¹Lobbyists reporting income or expenses are required to provide an estimate of the actual dollar amount rounded to the nearest \$10,000 for those amounts that exceed \$5,000. 2 U.S.C. § 1604(c)(1). In the event income or expenses do not exceed \$5,000, lobbyists are to include a statement that income or expenses totaled less than \$5,000 for the reporting period. 2 U.S.C. § 1604(c)(2).

²²Our 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.

Figure 4: Estimated Percentage of Lobbying Disclosure Reports with Differences in Reported and Documented Amount of Income and Expenses, 2011 through 2020



Source: GAO analysis. | GAO-21-375

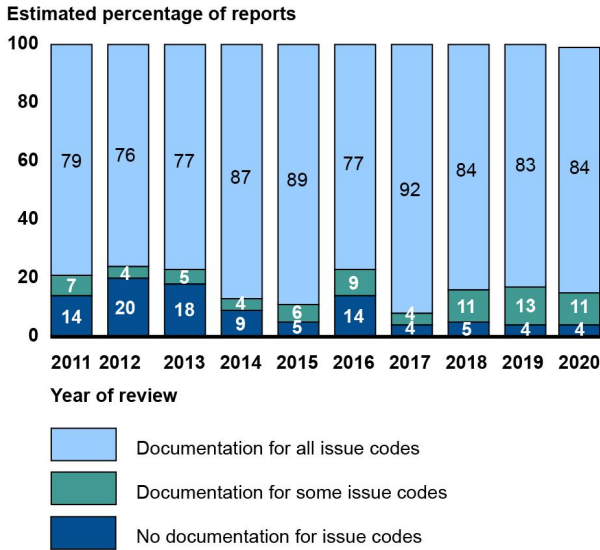
Note: Estimated percentages have a margin of error of 12 percentage points or fewer. In 2014, 2017, and 2019, percentages do not total 100 due to rounding.

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 97 LD-2 reports in our sample, 49 percent disclosed lobbying activities at federal agencies. Of those, lobbyists provided documentation for all disclosed lobbying activities at executive branch agencies for 52 percent of LD-2 reports and documentation for some lobbying activities at federal agencies for 16 percent of LD-2 reports.

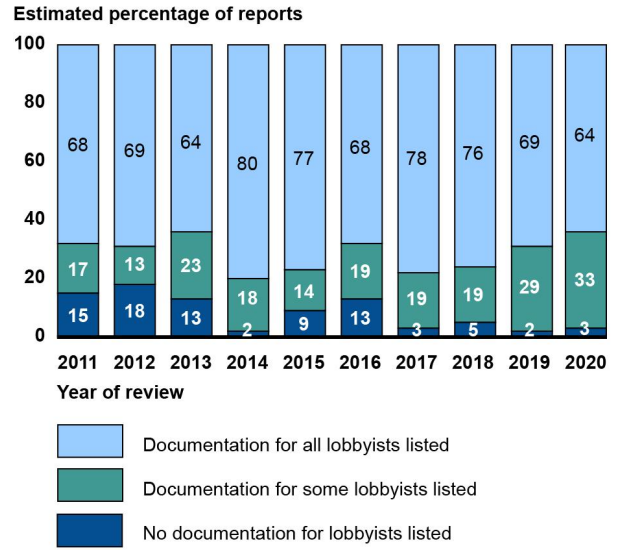
Figure 5 shows that lobbyists for most LD-2 reports provided documentation for selected elements of their LD-2 reports that include general issue area codes for lobbying activities, lobbying the House and the Senate, and individual lobbyists listed from 2011 through 2020. In 2020, documentation for lobbying the Senate decreased relative to 2018 and 2019, while documentation for lobbying the House decreased slightly but continued to reflect an improvement relative to prior years.

Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2011 through 2020

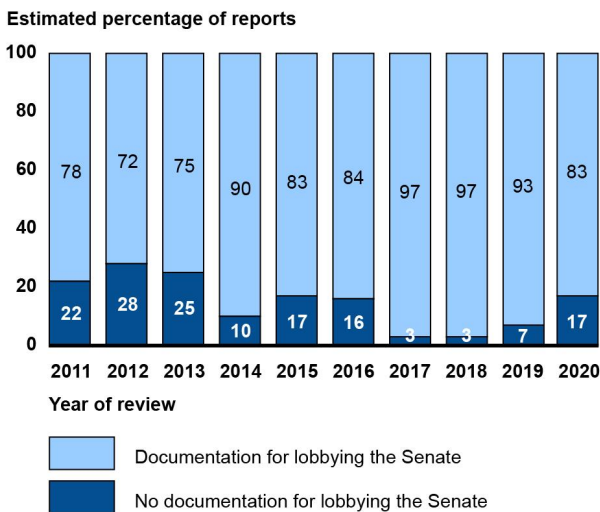
General Issue Areas



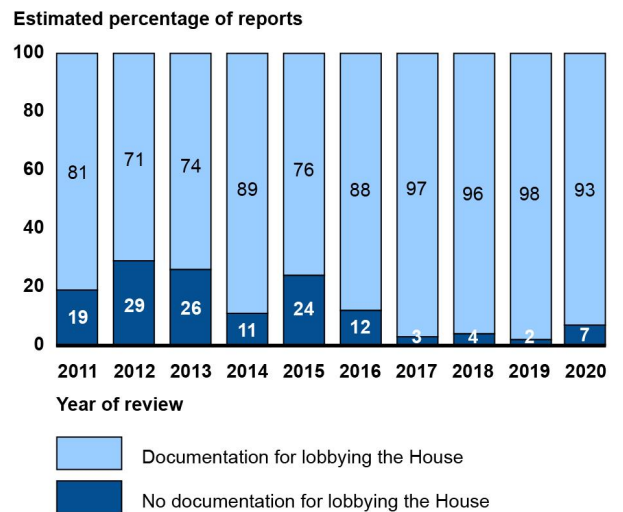
Individual Lobbyists Listed



Lobbying the United States Senate



Lobbying the House of Representatives



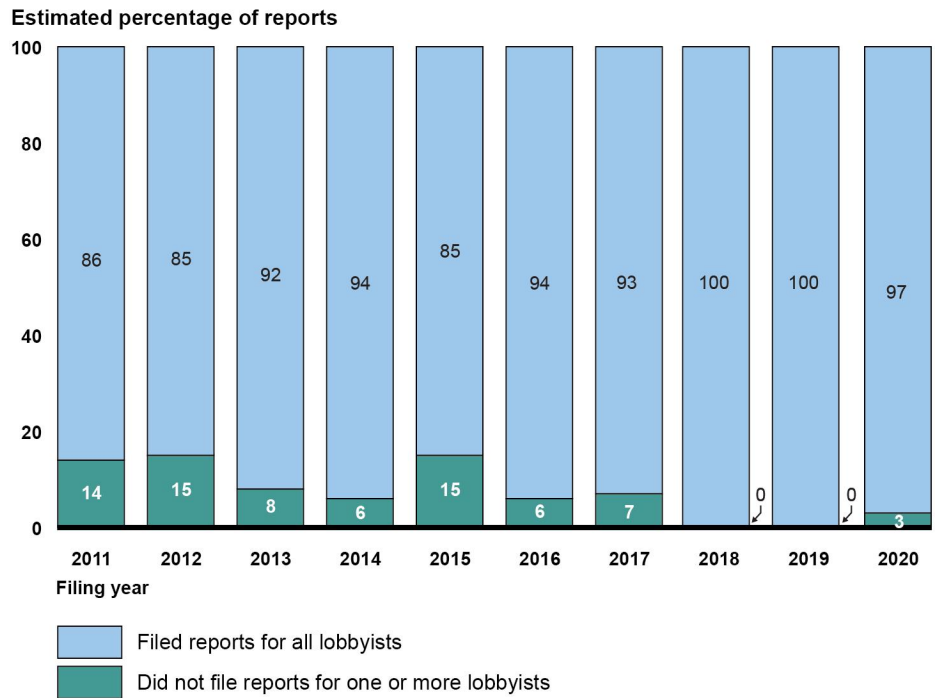
Source: GAO analysis of survey results. | GAO-21-375

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

For Most Lobbying Disclosure Reports, Lobbyists Filed Political Contribution Reports for All Listed Lobbyists

Figure 6 shows that most lobbyists filed contribution reports as required in our sample from 2011 through 2020. Lobbyists reporting lobbying activity are required to file LD-203 reports semiannually, even if they have no contributions to report, because they must certify compliance with the gift and travel rules. All lobbyists included in our 2019 sample and most lobbyists in our 2020 sample filed political contribution reports.

Figure 6: Extent to Which Lobbyists Filed Contribution Reports for All Listed Lobbyists, 2011 through 2020



Source: GAO analysis. | GAO-21-375

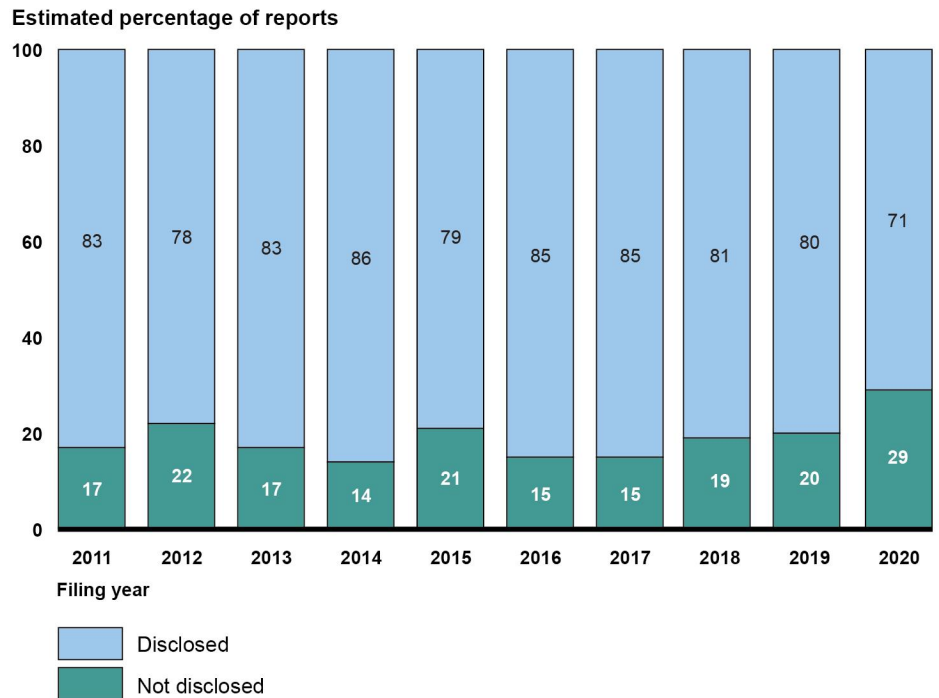
Note: Estimated percentages have a margin of error of 12 percentage points or fewer.

For Some LD-2 Reports, Lobbyists do Not Appear to Have Disclosed Their Previously Held Covered Positions

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

officials and congressional staff. This can be done either on an LD-1, where lobbyists list the employees who are expected to act as a lobbyist on behalf of the client, or on the quarterly LD-2 filing when adding a new individual lobbyist. For 2020, we estimated that 29 percent of all LD-2 reports contained individual lobbyists who may not have properly disclosed previously held covered positions as required.²³ 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 positions in congressional offices and executive agencies. Figure 7 shows the extent to which lobbyists did not appear to have properly disclosed one or more covered positions as required from 2011 through 2020.

Figure 7: Estimated Percentage of Lobbying Disclosure Reports Where Lobbyists Did Not Appear to Have Properly Disclosed One or More Covered Positions, 2011 through 2020



Source: GAO analysis. | GAO-21-375

²³Prior to each interview, we reviewed the individual lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Legistorm, and Google to determine whether the lobbyists properly disclosed their covered positions as required by the LDA.

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 branch positions. The term covered executive branch position refers to an officer or an employee serving in: (1) a position of the Executive Schedule or (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.

Lobbyists Reported No Criminal Convictions on LD-2 Reports for This Year's Review

Lobbyists were required to begin disclosing relevant convictions in their first quarter 2019 LD-2 reports. None of the lobbyists in our sample of LD-2 reports for the third and fourth quarters of 2019 and the first and second quarters of 2020—which together consisted of 210 individual lobbyists—disclosed any convictions in the reports. We researched these individual lobbyists and found no undisclosed JACK Act convictions. We were able to positively identify each individual lobbyist in our sample.²⁴

Some Lobbyists Amended Their Disclosure Reports after We Contacted Them

Of the 97 LD-2 disclosure reports in our original sample, lobbyists amended 31 of these reports to change previously reported information after we contacted them. Of the 31 reports, three were amended after we notified the lobbyists of our review but before we met with them. An additional 28 of the 31 reports were amended after we met with the lobbyists to review their documentation. We have consistently found a notable number of amended LD-2 reports in our sample each year following notification of our review. This suggests that our contact may spur some lobbyists to more closely scrutinize their reports than they would have without our review. Table 1 lists reasons lobbyists in our sample amended their LD-2 reports.

²⁴For more information, see appendix III.

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

Category	Number of times reason was selected
Updated covered position	22
Updated income or expenses	6
Changed House, Senate, or executive branch agency lobbying activity	6
Changed individual lobbyists	2
General issues	2
No Lobbying Activity	2
Other	1

Source: GAO analysis. | GAO-21-375

Note: Lobbyists amended 31 of the 97 LD-2 reports in our sample. Some 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 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 sample of LD-203 reports we reviewed contained 80 reports with contributions and 80 reports without contributions. We estimated that overall for 2020 lobbyists failed to disclose one or more reportable contributions on 8 percent of reports.²⁵ Additionally, 11 LD-203 reports were amended in response to our review. Table 2 shows our results from 2011 to 2020; estimates in the table have a maximum margin of error of 10 percentage points. The year to year differences are not statistically significant.

²⁵We did not estimate the percentage of other non-FEC political contributions that were omitted because they were a small minority of all listed contributions and cannot be verified against an external data source.

Table 2: Percentage of Lobbying Disclosure Contribution Reports That Omitted One or More Political Contributions, 2011-2020

Year of review	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Number of reports with contributions that had one or more omissions	12	14	10 ^a	8	11	9	11	9	6	13
Number of reports without contributions that had one or more omissions	2	4	0	1	0	1	2	0	0	0
Estimated percentage of all reports with one or more omissions	9%	9%	4%	4%	4%	5%	6%	4%	2%	8%

Source: GAO analysis. | GAO-21-375

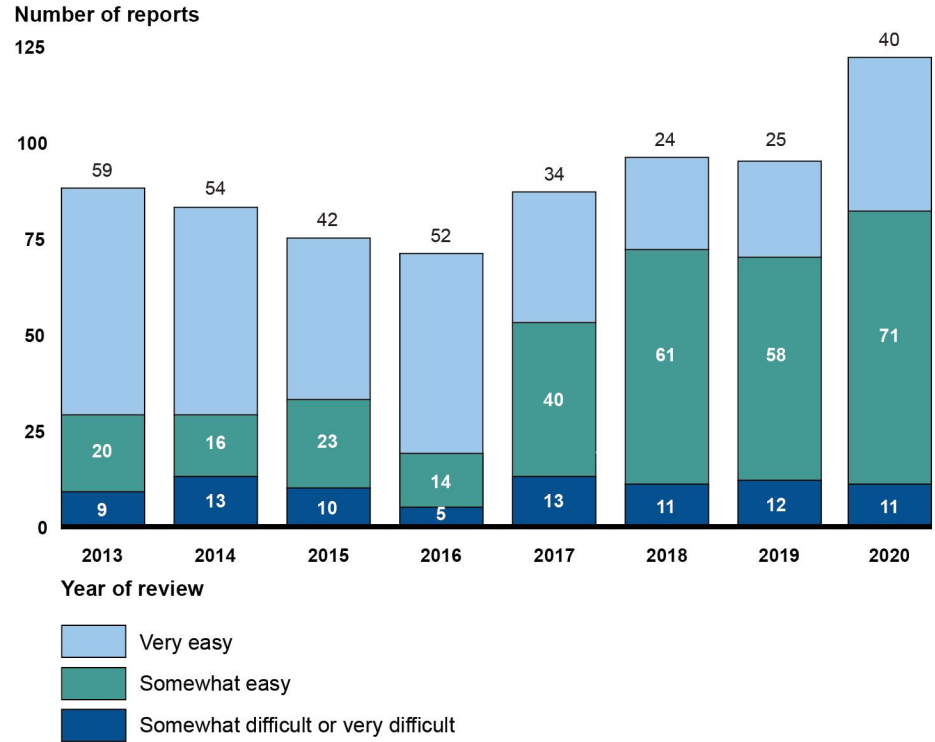
^aIn 2013, N=79. For all other years, N=80.

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

As part of our review, 129 different lobbyists were included in our 2020 sample of LD-2 disclosure reports.²⁶ There are more lobbyists in our sample than in years past, as we were unsure whether response rates would be lower due to the ongoing Coronavirus Disease 2019 (COVID-19) pandemic. Although the number of lobbyists in our sample increased, our results are consistent with prior reviews. Most lobbyists reported that they found it “very easy” or “somewhat easy” to comply with reporting requirements. Of the 129 different lobbyists in our sample, 40 reported that the disclosure requirements were “very easy,” 71 reported they were “somewhat easy,” and 11 reported they were “somewhat difficult” or “very difficult.” Seven lobbyists did not respond to this question (see fig. 8).

²⁶The use of the term “lobbyists” in this context includes individual lobbyists, lobbying firms, and organizations with in-house lobbyists.

Figure 8: Ease of Complying with Lobbying Disclosure Requirements, 2013 through 2020



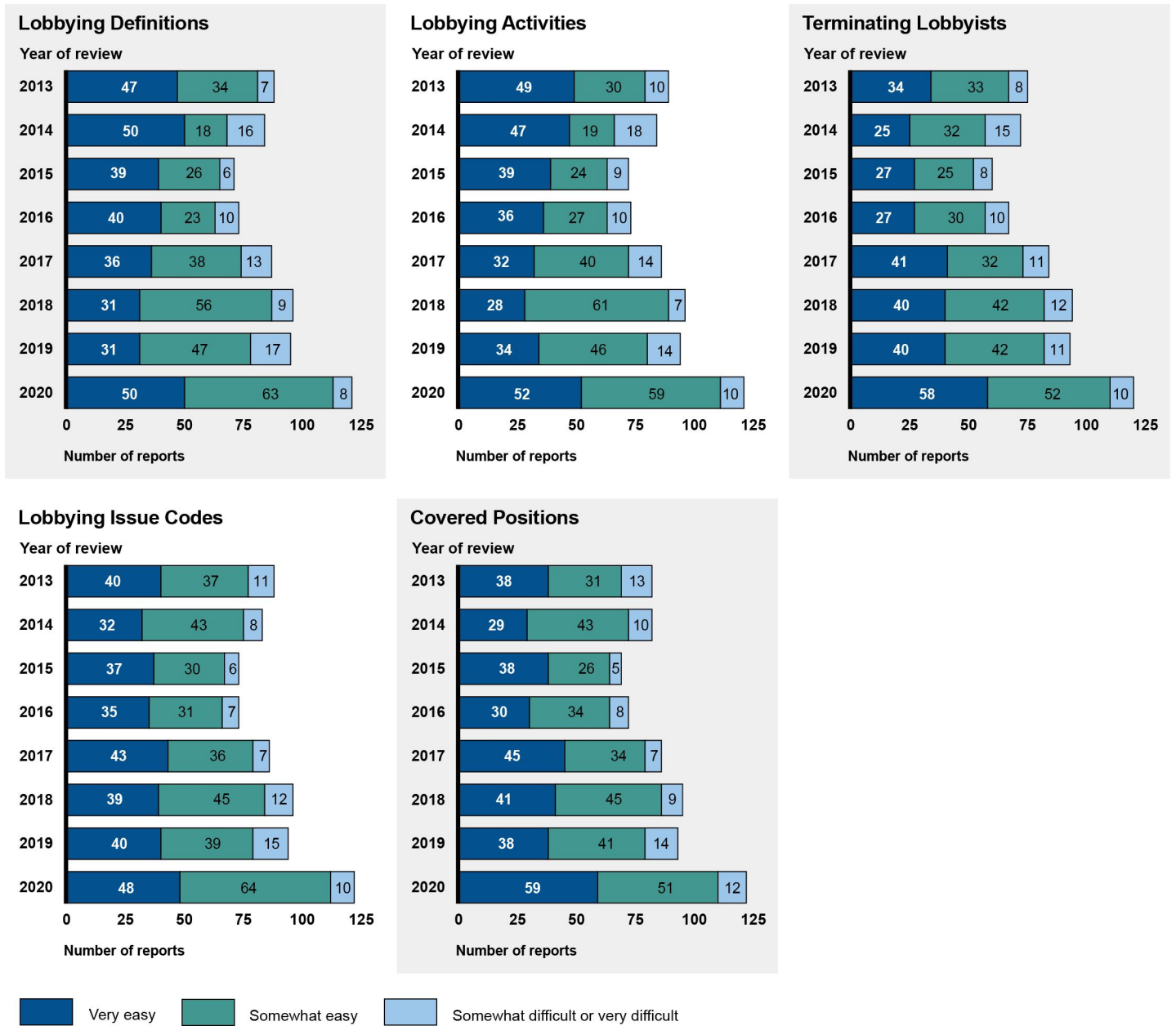
Source: GAO analysis of survey results. | GAO-21-375

Note: The number of possible responses varies because of changes in sample size over time. Smaller sample sizes in prior years have limited our ability to identify changes in the percentage of reports with documentation, and whether those changes were statistically significant. In 2020, the sample size increased to 129, as we oversampled lobbyists in the event we received lower response rates during the COVID-19 pandemic.

Most lobbyists 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 2013 through 2020.²⁷

²⁷Some lobbyists 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 lobbyists in figure 9.

Figure 9: Ease of Understanding Key Lobbying Terms, 2013 through 2020



Source: GAO analysis of survey results. | GAO-21-375

Note: The number of possible responses varies because of changes in sample size over time. Smaller sample sizes in prior years have limited our ability to identify changes in the percentage of reports with documentation, and whether those changes were statistically significant. In 2020, the

sample size increased to 129, as we oversampled lobbyists in the event we received lower response rates during the COVID-19 pandemic.

USAO Continues to Enforce the LDA

USAO Has Resources and Authorities to Enforce LDA Compliance

Officials from USAO stated that they continue to have sufficient personnel resources and authority under the LDA to enforce reporting requirements. Enforcement includes imposing civil or criminal penalties for noncompliance. Noncompliance refers to a lobbyist's failure to comply with the LDA. According to USAO officials, they have one contract paralegal specialist assigned full time; one paralegal specialist assigned part time; and one civil investigator as needed. In addition, criminal and civil assistant U.S. attorneys are also available as needed.

USAO officials stated that registrants resolve their noncompliance issues by filing their missing LD-2 or LD-203, by amending their LD-2, or by terminating their registration, depending on the issue.²⁸ Resolving referrals can take anywhere from a few days to years, depending on the circumstances.²⁹ 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 e-mail, 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/waiting for a response," "bad address," and "unable to locate." USAO officials noted that they attempt to review and update all pending cases every 6 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 unsuccessful attempts, USAO cannot contact

²⁸The LDA refers to a lobbyist or organization that files an initial registration (LD-1) as a "registrant." 2 U.S.C. § 1603(a)-(c). The LDA then requires the registrant to file quarterly reports (LD-2) and semiannual reports (LD-203). 2 U.S.C. § 1604(a), (d)(1).

²⁹Referrals are required notifications that the Secretary of the Senate and the Clerk of the House send to USAO about a lobbyist's possible noncompliance with the LDA. 2 U.S.C. § 1605(a)(8).

the noncompliant lobbyist, it confers with both the Secretary of the Senate and the Clerk of the House to determine whether further action is needed.

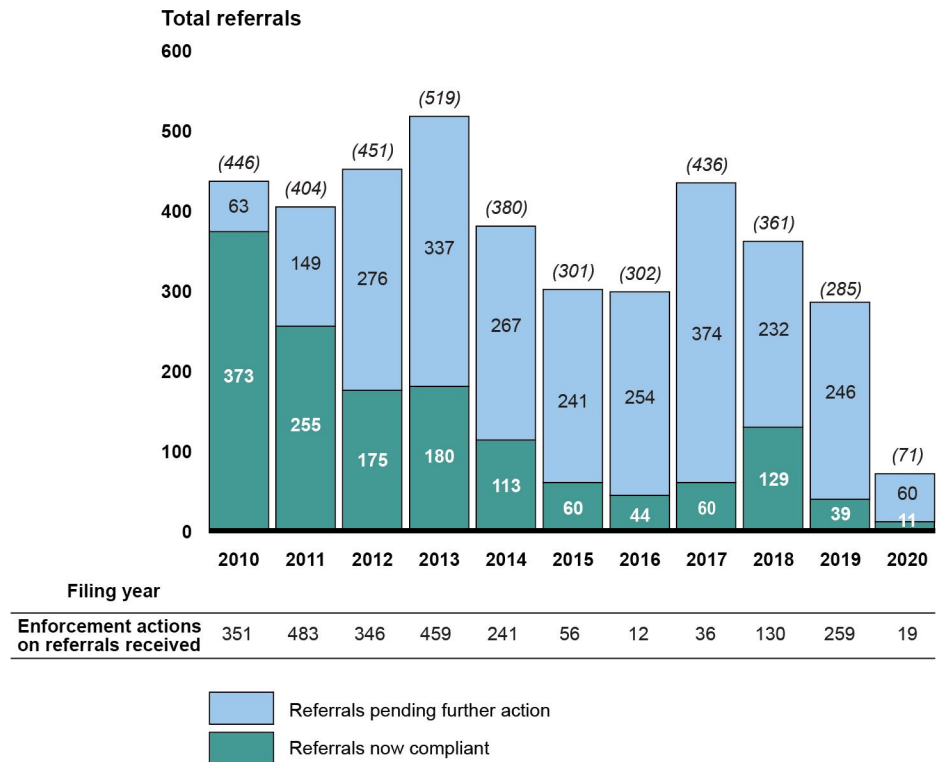
In cases where the lobbyist is repeatedly referred for not filing disclosure reports but does not appear to be actively lobbying, USAO suspends enforcement actions. USAO officials reported they continue to monitor these lobbyists and will resume enforcement actions if appropriate.

Status of LD-2 Enforcement Efforts

USAO received 3,956 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 2010 through 2020. Figure 10 shows the number and status of the referrals received and the number of enforcement actions taken by USAO to bring lobbyists into compliance. Enforcement actions include USAO attempts to bring lobbyists into compliance through letters, e-mails, and calls.³⁰

³⁰Referrals 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 Reporting, 2010 through 2020



Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Note: Referrals may be received by the U.S. Attorney's Office for the District of Columbia months or years after the filing period for which they relate.

According to USAO officials, about 36 percent (1,439 of 3,956) of the total referrals received are compliant as of November 10, 2020, because lobbyists 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 lobbyists respond to the contact letters from the Secretary of the Senate and the Clerk of the House after USAO received the referrals. About 63 percent (2,499 of 3,956) of referrals are pending further action because USAO could not locate the lobbyist, did not receive a response from the lobbyist after an enforcement action, or plans to conduct additional research to determine if it can locate the lobbyist. The remaining 18 referrals did not require action or were suspended because the lobbyist or client was no longer in business or the individual lobbyist was deceased.

Status of LD-203 Referrals

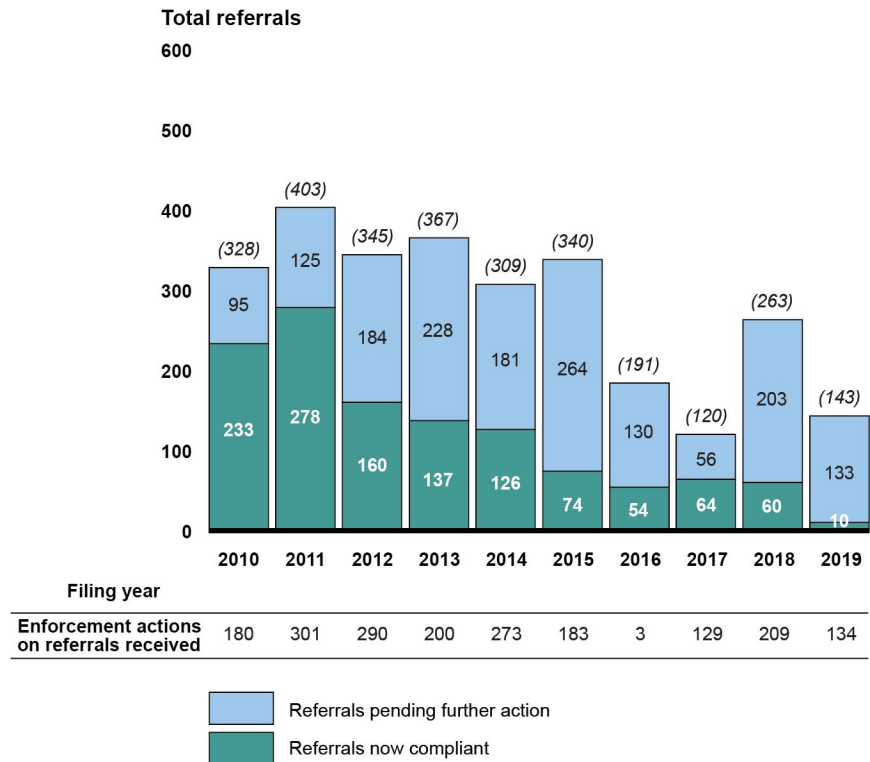
LD-203 referrals consist of two types: (1) LD-203(R) referrals represent lobbying firms that have failed to file LD-203 reports for their lobbying firm and (2) LD-203 referrals represent the individual lobbyists at the lobbying firm who have failed to file their individual LD-203 reports as required.³¹ USAO received 2,809 LD-203(R) referrals for lobbying firms (cumulatively from 2010 through 2019) and 7,038 LD-203 referrals for individual lobbyists (cumulatively from 2010 through 2019) 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 individual 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. According to USAO officials, this makes it difficult to locate an individual lobbyist who is not in compliance, particularly one who may have left the firm. Lobbyists who repeatedly fail to file reports are labeled by USAO officials as chronic offenders and referred to assigned attorneys for further enforcement action.

USAO officials said that many lobbying firms have assisted USAO by providing contact information for individual lobbyists but they are not required to do so. USAO officials told us that they collaborate with other law enforcement agencies, and use web searches and online databases, including social media, to find these missing individual lobbyists, but they are not always successful. Figure 11 shows the status of LD-203(R) referrals received and the number of enforcement actions taken by USAO to bring lobbying firms into compliance.

³¹The use of the term "lobbying firms" in this context includes organizations with in-house lobbyists and self-employed individuals. A self-employed lobbyist must file two LD-203s – one in the sole proprietorship business name and one as an individual lobbyist.

Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure, Lobbying Firms Only, 2010 through 2019



Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Note: No referrals have been received for 2020. Referrals may be received by the U.S. Attorney's Office for the District of Columbia months or years after the filing period to which they relate.

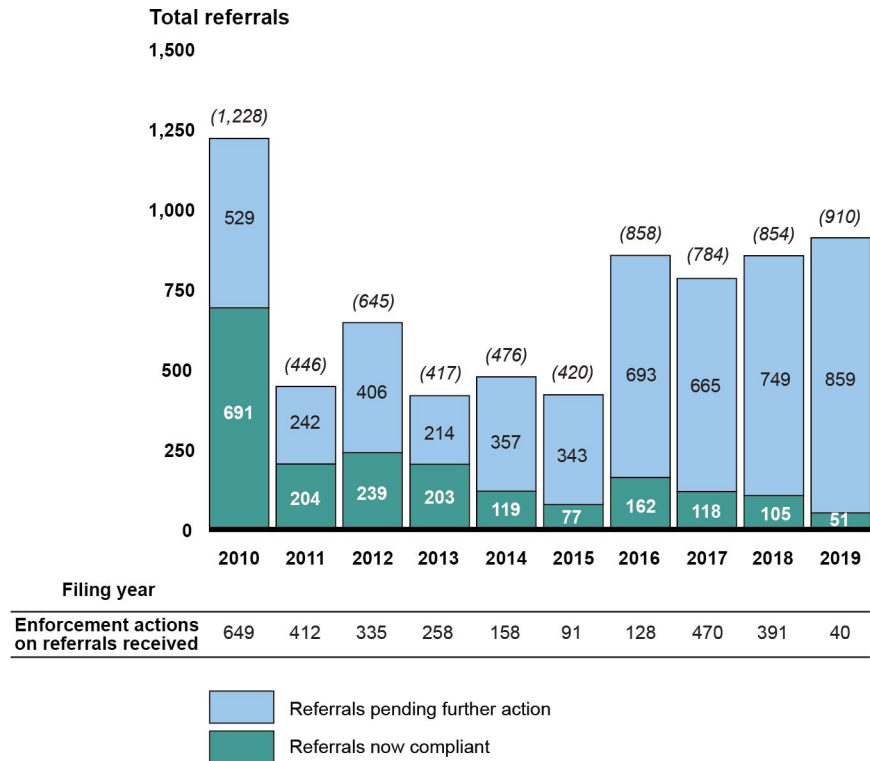
About 43 percent (1,196 of 2,809) of the lobbying firms referred by the Secretary of the Senate and Clerk of the House for noncompliance from calendar years 2010 through 2019 are compliant as of November 10, 2020, because they either filed their reports or terminated their registrations. About 57 percent (1,599 of 2,809) of the referrals are pending further action. The remaining 14 referrals did not require action or were suspended because the lobbying firm or client was no longer in business or the lobbyist (in the case of a self-employed individual) was deceased.

USAO received 7,038 LD-203 referrals from the Secretary of the Senate and Clerk of the House for lobbying firms where one or more lobbyists employed by the firm failed to comply with LD-203 reporting requirements for calendar years 2010 through 2019. Figure 12 shows the status of the

referrals received and the number of enforcement actions taken by USAO to bring these lobbyists into compliance. In addition, figure 12 shows that about 28 percent (1,969 of 7,038) of the referrals received are in compliance as of November 10, 2020, because all of the listed lobbyists had either filed their reports or were no longer registered as a lobbyist.

About 72 percent (5,057 of 7,038) 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 12 referrals did not require action or were suspended because the lobbyist or client was no longer in business or the individual lobbyist was deceased.

Figure 12: Status of Lobbying Disclosure Act Referrals for Individual Lobbyists Employed at Lobbying Firms, 2010 through 2019

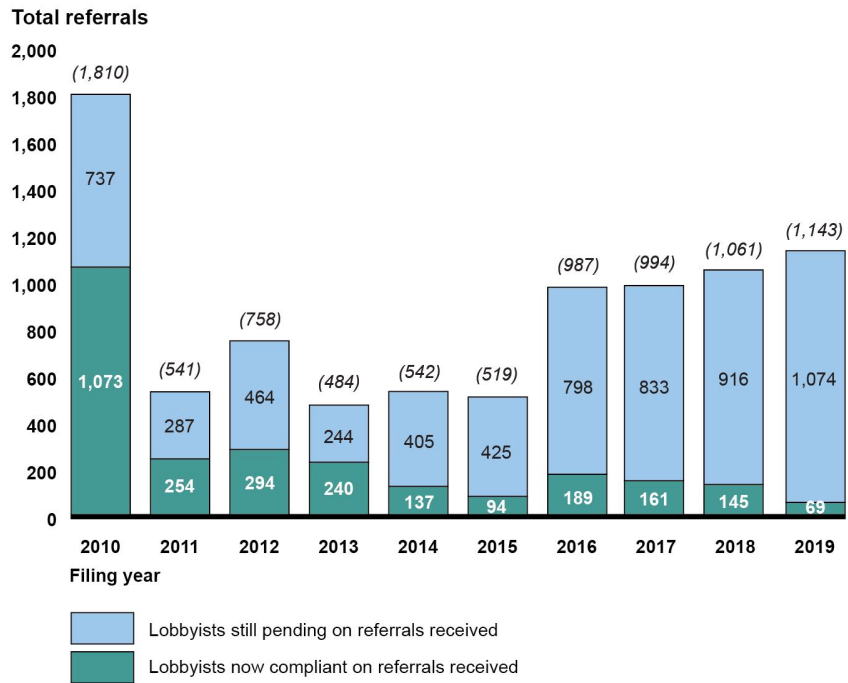


Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Note: No referrals have been received for 2020. Referrals may be received by the U.S. Attorney's Office for the District of Columbia 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 8,839 individual lobbyists who failed to comply with LD-203 reporting requirements for any filing year from 2010 through 2019. Figure 13 shows the status of compliance for individual lobbyists listed on referrals to USAO. About 30 percent (2,656 of 8,839) of the individual lobbyists had come into compliance by filing their reports or are no longer registered as a lobbyist. About 70 percent (6,183 of 8,839) 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 Referrals of Individual Lobbyists, 2010 through 2019



Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Note: No referrals have been received for 2020. Referrals may be received by the U.S. Attorney's Office for the District of Columbia months or years after the filing period to which they relate.

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

JACK Act Enforcement

According to USAO, its enforcement role regarding the JACK Act is the same as any other prosecution. If the individual or organization has misrepresented themselves on the LD-2 report, USAO may bring a criminal prosecution or impose civil penalties under the LDA. To date, no referrals have been made under the JACK Act.

Status of Enforcement Settlement Actions

According to USAO officials, they label lobbyists who repeatedly fail to file reports as chronic offenders and refer these offenders 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.

USAO has ongoing investigations for individuals and organizations based upon their noncompliance history. However, USAO officials told us that no suits have been initiated or cases settled since our 2018 lobbying report. They said that USAO continues to review its records to identify additional chronic offenders for further action due to noncompliance.³²

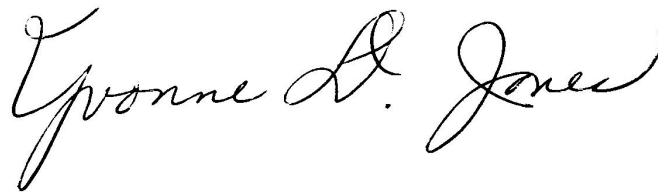
Agency Comments

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>.

³²On June 25, 2020, the lobbyist Jack Abramoff was charged in the District Court, Northern District of California, in the first criminal prosecution for violating the LDA, among other things. Mr. Abramoff was charged with one count of failure to comply with the LDA and subsequently pled guilty to the charge on July 14, 2020.

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.

A handwritten signature in black ink that reads "Yvonne D. Jones". The signature is written in a cursive style with a large initial "Y" and a long, sweeping underline.

Yvonne D. Jones
Director, Strategic Issues

List of Committees

The Honorable Gary C. Peters
Chairman
The Honorable Rob Portman
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Dick Durbin
Chairman
The Honorable Chuck Grassley
Ranking Member
Committee on the Judiciary
United States Senate

The Honorable Amy Klobuchar
Chairwoman
The Honorable Roy Blunt
Ranking Member
Committee on Rules and Administration
United States Senate

The Honorable Zoe Lofgren
Chairwoman
The Honorable Rodney Davis
Ranking Member
Committee on House Administration
House of Representatives

The Honorable Jerrold Nadler
Chairman
The Honorable Jim Jordan
Ranking Member
Committee on the Judiciary
House of Representatives

The Honorable Carolyn B. Maloney
Chairwoman
The Honorable James Comer
Ranking Member
Committee on Oversight and Government 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 combinations of House ID, lobbyist, and client names (see table 3).

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

Table 3: Names of Lobbyists and Clients Selected in Random Sampling of Lobbyist Disclosure Reports Filed in the Third and Fourth Quarters of 2019 and First and Second Quarters of 2020

Lobbyists	Clients
Akerman LLP	National Court Appointed Special Advocate Association (CASA)
Alcalde & Fay	Lake County
Alignment Government Strategies	Swing State Strategies on behalf of Youngstown-Warren Regional Chamber
Alpine Group, Inc. ^a	Pure Storage, Inc.
Alpine Group Partners, LLC ^a	Grassland Water District
American Humanist Association	American Humanist Association
American Immigration Lawyers Association	American Immigration Lawyers Association
Amitay Consulting	National Association of Security Companies (NASCO)
AnnDyl Policy Group, LLC	Pearl National Home Certification
Arent Fox LLP	Alliance of Nonprofits for Insurance, Risk Retention Group, Inc.
Bachner Group	Rivada Networks
Baxter Healthcare Corporation	Baxter Healthcare Corporation
BC Consulting, LLC	National Tank Truck Carrier, Inc.
Beacon Strategies	Assist Scholars
Blank Rome Government Relations	Shee Atika Inc.
Boehringer Ingelheim Pharmaceuticals, Inc.	Boehringer Ingelheim Pharmaceuticals, Inc.
Bracewell LLP	Denka Performance Elastomer LLC
Bryan Cave Leighton Paisner LLP	Technology Service Corporation
Buchanan Ingersoll & Rooney PC	New Jersey Resources Corporation
Capitol Hill Consulting Group	Shasta County Residents for Positive Community Development, Inc.
Carmen Group Incorporated	Ardagh Glass Inc.
Cavarocchi Ruscio Dennis Associates, L.L.C.	American Association of Bioanalysts
Ceres, Inc.	Ceres, Inc.
Crossroads Strategies, LLC	Action Now Initiative, LLC (ANI)
Crossroads Strategies, LLC	Google Inc.
CSX Corporation	CSX Corporation
Dentons US LLP	Cameco Corporation
Emergent Strategies	LiveRamp, Inc.
Ernst & Young LLP (Washington Council Ernst & Young)	Valero Energy Corporation
FACT COALITION (A Project of the Fund for Constitutional Government)	FACT COALITION (a project of the Fund for Constitutional Government)
Fierce Government Relations	eBay Inc.

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Sampled Lobbying Disclosure Reports**

Lobbyists	Clients
Frost Brown Todd LLC	U.S. Hemp Roundtable
Gordon Thomas Honeywell Governmental Affairs	Snohomish County Council
GrayRobinson PA	Green Dot Corporation
Hart Health Strategies	American Society of Plastic Surgery
Hobbs, Straus, Dean & Walker, LLP	Catawba Indian Nation
Holland & Hart LLP	UnCruise Adventures
Holland & Knight LLP	National Association Of EMS Physicians
Holland & Knight LLP	Railway Supply Institute
Holland & Knight LLP	Zovio Inc. f/k/a Bridgepoint Education
Horizon Government Affairs	Inmar Inc.
Ice Miller Strategies LLC	Truck Trailer Manufacturers Association
Indiana Farm Bureau, Inc.	Indiana Farm Bureau, Inc.
JDRF Intl. (formerly known as Juvenile Diabetes Research Foundation Intl.)	JDRF Intl. (formerly known as Juvenile Diabetes Research Foundation Intl.)
John T. Doolittle, LLC	NMAR, Inc.
Jones Walker, LLP	Association of Catastrophe Adjusters
K&L Gates LLP	Axiom Space, Inc.
Kadesh & Associates, LLC	City of Compton
Klein/Johnson Group	Burford Capital LLC
Liberty Partners Group, LLC	Hollister Incorporated
Lungren Lopina LLC	Medallia, Inc.
Lungren Lopina LLC	U.S. Chamber of Commerce Institute for Legal Reform
M.J. Simon & Company, LLC	Maximus, Inc.
Mapetsi Policy Group	San Carlos Apache Tribe
Marcus G. Faust, PC	City of St. George
McDermott+Consulting LLC	Point of Care Testing Association
McGuireWoods Consulting (A Subsidiary of McGuireWoods LLP)	Skaroreh Katenuaka Nation, Tuscarora Nation of Indians
Mehlman Castagnetti Rosen & Thomas, Inc.	FCA US LLC
Mehlman Castagnetti Rosen & Thomas, Inc.	Lyft, Inc.
Milne, Wiener & Shofe Global Strategies (FKA M & W Government Affairs, LLC)	Huron Consulting Services, LLC.
Mr. Jordan Wicker	The Trustees of Purdue University
Mr. Marshall Brachman	W. David Hemingway
Nathanson+Hauck	DaVita Inc.
National Association of College and University Business Officers (NACUBO)	National Association of College and University Business Officers (NACUBO)
Navigators Global LLC (Formerly DC Navigators, LLC)	Act for NIH

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Sampled Lobbying Disclosure Reports**

Lobbyists	Clients
NVG, LLC	Tobacco-Free Kids Action Fund
O'Brien, Gentry & Scott, LLC	Spaceflight Industries
Park&K Public Affairs LLC	Florida Association of Community Health Centers
Pillsbury Winthrop Shaw Pittman LLP	Blackhawk Network
Pillsbury Winthrop Shaw Pittman LLP	City of Burlington, North Carolina
Polsinelli PC	Physician Assistant Education Association
Prime Policy Group	Customized Logistics & Delivery Assn. (formerly Messenger Courier Association)
Prime Policy Group	NEC Corporation
Reinecke Strategic Solutions, Inc.	AARP
REM Strategies, LLC	Clausen House
Rich Feuer Anderson	Freedom Mortgage Corporation
Ruffalo and Associates, LLC	Riverside County Transportation Commission
Schwan's Company	Schwan's Company
Signal Group Consulting, LLC	National Industries for the Blind
Simon and Company	Sacramento Housing and Redevelopment Agency (SHRA)
Sirona Strategies LLC	Aledade, Inc.
Steptoe & Johnson LLP	American Outdoor Brands Corporation
Steptoe & Johnson LLP	The Carlyle Group
Subject Matter (fka Elmendorf Ryan)	Managed Funds Association
Summit Strategies Government Affairs LLC	SB Capitol Solutions on behalf of U.S. Travel Association
TG&C Group	RBS Citizens, N.A.
The Ferguson Group, LLC	Southern California Public Power Authority (SCPPA)
The Ferguson Group, LLC	Western Municipal Water District
The Gibson Group, LLC	eBay, Inc.
The Russell Group, Inc.	Global Crop Diversity Trust
The Travelers Cos., Inc. and Subsidiaries	The Travelers Cos., Inc. and Subsidiaries
Tiber Creek Health Strategies, Inc.	Genentech, Inc.
Townsend Public Affairs ^{b,c}	City of Buena Park
Townsend Public Affairs ^{b,c}	City of Merced
Townsend Public Affairs ^{b,c}	Guadalupe Union School District
Van Scoyoc Associates	College on Problems of Drug Dependence
W.L. Gore & Associates	W.L. Gore & Associates
Washington Premier Group	Federally Employed Women
Washington2 Advocates	City Of Auburn
Williams and Jensen, PLLC	General Electric Company (previously reported as GE Aviation)
Williams and Jensen, PLLC	MT Pharma America, Inc.

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

Lobbyists	Clients
Winning Strategies Washington	Zoll
Winston & Strawn LLP	Liberty Maritime Corporation
WPX Energy, Inc.	WPX Energy, Inc.
Yale University	Yale University

Source: Lobbying disclosure database of the Clerk of the House of Representatives for the third and fourth quarters of 2019 and the first and second quarters of 2020. | GAO-21-375

^aFirms did not respond to requests to participate.

^bFirms completed or partially completed the survey, but did not participate in an interview.

^cFirms declined to participate in GAO's 2020 lobbying disclosure survey.

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

Table 4: Lobbyists in Sample of Lobbying Contribution Reports with Contributions Listed, Filed Year-End 2019 or Midyear 2020

Lobbyist	Reporting period
A.J. Wojciak	Year-end 2019
AIRBNB, Inc.	Year-end 2019
American Association of Child & Adolescent Psychiatry	Year-end 2019
American Soybean Association	Year-end 2019
Anastasios Manatos	Midyear 2020
Anthony Herman	Midyear 2020
Arshi Siddiqui	Year-end 2019
Association of Oil Pipe Lines	Midyear 2020
Barbara Rohde	Midyear 2020
Barry Brown	Midyear 2020
Battelle Memorial Institute	Year-end 2019
Ben Turner	Midyear 2020
Benjamin Quayle	Midyear 2020
Bob Holmes	Year-end 2019
Brand Law Group	Year-end 2019
Brian Vanderbloemen	Year-end 2019
Catherine Beal	Midyear 2020
CEMEX Inc.	Year-end 2019
Chesapeake Energy Corporation	Midyear 2020
Christopher Roe	Midyear 2020
Commerce Bank	Midyear 2020
Curtis Legeyt	Midyear 2020
Dave Kemmerly	Midyear 2020
David Cohen	Year-end 2019
Delta Council	Year-end 2019
DTB Associates LLP	Year-end 2019
Elisabeth Ross	Midyear 2020
Elizabeth Dougherty	Year-end 2019
EMD Serono, Inc.	Year-end 2019
Eriade Williams	Midyear 2020
FMC Corporation	Year-end 2019

Lobbyist	Reporting period
Gaurav Parikh	Year-end 2019
Gibbons P.C.	Year-end 2019
GovBiz Advantage, Inc.	Year-end 2019
GrayRobinson PA	Midyear 2020
Greenberg Traurig, LLP	Midyear 2020
Greenwich Biosciences, Inc.	Year-end 2019
HawkEye 360 Inc.	Midyear 2020
Henry Ristuccia	Midyear 2020
Independent Electrical Contractors, Inc.	Midyear 2020
Intercontinental Exchange Group, Inc. (Formerly Intercontinental Exchange)	Midyear 2020
Jason Goggins	Year-end 2019
Jeff MacKinnon	Midyear 2020
Jennifer Berg	Year-end 2019
Jerry Driscoll	Midyear 2020
Jim Francesconi	Midyear 2020
Kenneth Moy	Year-end 2019
Kevin Binger	Year-end 2019
Laura Appel	Year-end 2019
Lawrence Gonzalez	Year-end 2019
Lesly Weber McNitt	Midyear 2020
Mary Pavel	Year-end 2019
Michael Bennett	Year-end 2019
Michael Dino	Midyear 2020
Michael Gertzman	Midyear 2020
Monica Popp	Midyear 2020
Mr. Aaron Oesterle	Year-end 2019
Nathan Cook	Midyear 2020
Olsson, Frank, Weeda, Terman & Matz, PC	Year-end 2019
Peter Grollman	Year-end 2019
Recording Academy (FKA National Academy of Recording Arts and Sciences)	Midyear 2020
Robert Goodlatte	Year-end 2019
Robert Livingston	Year-end 2019
Samantha Slater	Midyear 2020
Sarah Ducich	Midyear 2020
Scott Olson	Year-end 2019
Smith Davis	Year-end 2019

Lobbyist	Reporting period
Sports & Fitness Industry Association	Year-end 2019
Susan Brophy	Midyear 2020
Susan Buck	Midyear 2020
Susan Buck	Year-end 2019
Sydney Barron	Year-end 2019
Synchrony Financial	Midyear 2020
Theodore Bornstein	Midyear 2020
Theodore Okon	Midyear 2020
Total Administrative Services Corp.	Year-end 2019
Tricia Guay	Midyear 2020
Whirlpool Corporation	Midyear 2020
William Southerland	Year-end 2019
Ziebart Consulting, LLC	Midyear 2020

Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2019 and midyear reports for calendar year 2020. | GAO-21-375.

Table 5: Lobbyists in Random Sample of Lobbying Contribution Reports without Contributions Listed, Filed Year-End 2019 or Midyear 2020

Lobbyist	Reporting period
Alexander Olah	Year-end 2019
Alicia Epstein	Midyear 2020
Amanda Krzepicki	Year-end 2019
American Society for Dermatologic Surgery Association	Year-end 2019
American Thoracic Society	Year-end 2019
Amish Shah	Year-end 2019
Annie Kennedy	Year-end 2019
Benjamin Kallen	Year-end 2019
Benjamin Portis	Year-end 2019
Brendon Plack	Year-end 2019
Christina Erling	Year-end 2019
Christopher Rorick	Year-end 2019
Citizens Committee for the Right to Keep and Bear Arms	Midyear 2020
Craig Metz	Year-end 2019
Dakota Jablon	Year-end 2019
Dana Thompson	Year-end 2019
David Connolly	Midyear 2020
David Tinsley	Midyear 2020
Dwight Cates	Year-end 2019
Eli Joseph	Midyear 2020
Erika Nielsen	Year-end 2019
Francis Turner	Year-end 2019
Garrett Workman	Year-end 2019
Hannah Evans	Year-end 2019
Hannegan Landau Poersch & Rosenbaum Advocacy, LLC	Midyear 2020
Helena Hernandez	Midyear 2020
International Swaps & Derivatives Association, Inc.	Year-end 2019
Jennifer Thomas	Year-end 2019
Jenny Deberry	Year-end 2019
Joanne Faulkner	Year-end 2019
John Beisner	Year-end 2019
John McGlew	Midyear 2020
Katie Sarro	Midyear 2020
Kelly Bobek	Midyear 2020

Lobbyist	Reporting period
Kristi Martin	Year-end 2019
Lawrence Levinson	Year-end 2019
Lillie Brady	Midyear 2020
Lindsey Klaassen	Year-end 2019
LJ Consulting, LLC	Year-end 2019
Macon Edwards	Midyear 2020
Madeline Curtis	Midyear 2020
Maggie Lemmerman	Midyear 2020
Marc Scheessele	Midyear 2020
Mari Savickis	Midyear 2020
Meredith McGehee	Midyear 2020
Michael Tomberlin	Midyear 2020
Michelle Neblett	Midyear 2020
Montserrat Miller	Midyear 2020
Mr. Mark Malone	Midyear 2020
National Disability Rights Network	Year-end 2019
Neil Naraine	Midyear 2020
New Century Government Affairs (F/K/A Terrence C. Wolfe)	Midyear 2020
New Jersey Hospital Association	Midyear 2020
Nicolas Quinones	Midyear 2020
NORMINC	Midyear 2020
Novavax, Inc.	Year-end 2019
Patricia Koch	Midyear 2020
Patriot Strategies, Inc.	Midyear 2020
Paul Feenstra	Midyear 2020
Phyllis Arthur	Midyear 2020
Rachel Stauffer	Year-end 2019
Richard Price	Year-end 2019
Robert Edwards	Year-end 2019
Robert Herbert	Midyear 2020
Ryan Bowley	Year-end 2019
Ryan Miltner	Midyear 2020
Sally Veith	Midyear 2020
Sandy Marks	Midyear 2020
Sean Moore	Midyear 2020
St. Luke's Hospital & Health Network	Year-end 2019
Stefanie Dearie	Midyear 2020

Lobbyist	Reporting period
Stephen Kittredge	Midyear 2020
Stephen Plevniak	Year-end 2019
Steven Heeley	Year-end 2019
Sullivan & Cromwell LLP	Midyear 2020
Swinerton Builders	Midyear 2020
Team Builders	Year-end 2019
Tracey Glenn	Year-end 2019
Wendy Darwell	Year-end 2019
William McGahay	Midyear 2020

Source: Lobbying contributions database of the Clerk of the House of Representatives. Year-end reports for calendar year 2019 and midyear reports for calendar year 2020. | GAO-21-375.

Appendix III: Objectives, Scope, and Methodology

Our objectives were to (1) determine the extent to which lobbyists are able to demonstrate compliance with the requirements for registrations and reports filed under the Lobbying Disclosure Act of 1995, as amended (LDA); (2) identify any challenges or potential improvements to compliance by lobbyists; 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.¹

We used information in the lobbying disclosure database maintained by the Clerk of the House of Representatives. 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.

In our previous reviews, House staff told us 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 reasons

¹ For the purposes of our report, we use the term lobbyist to refer to individual lobbyists, lobbying firms (including self-employed individuals who are lobbyists), and organizations with in-house lobbyists, unless noted otherwise.

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 to sample LD-2 reports from the third and fourth quarters of 2019 and the first and second quarters of 2020, as well as for sampling year-end 2019 and midyear 2020 political contributions reports (LD-203).

We also used the database to match 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 97 LD-2 reports from the third and fourth quarters of 2019 and the first and second quarters of 2020.² We excluded reports with no lobbying activity or with income or expenses of less than \$5,000 from our sampling frame.³ We drew our sample from 52,289 activity reports filed for the third and fourth quarters of 2019 and the first and second quarters of 2020 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 2011 to 2020 for the generalizable elements of our review. We found that

²Our original sample included 148 randomly selected LD-2 reports, including twelve additional reports per quarter to supplement the base sample in the case of substantial non-response. One lobbyist with four selected reports declined to participate and six lobbyists were non-responsive to requests for participation. We selected five reports from the supplemental reports based on the quarter in which they were needed and we did not use the remaining 38 additional selected reports. Appendix I provides a complete list of lobbyists and clients for sampled lobbying disclosure reports.

³LD-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.

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.⁴

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 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 individual lobbyists or their designees 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 individual lobbyists properly disclosed their covered positions as required by the LDA. We reviewed the lobbyists' previous work histories by searching lobbying firms' websites, LinkedIn, Legistorm, and Google. Prior to 2008, individual lobbyists were only required to disclose covered

⁴A Bonferroni adjustment is a statistical adjustment designed to reduce the chance of making a type-1 inferential error, which 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.

official positions held within 2 years of registering as an individual 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 individual 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 an individual 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 an individual lobbyist appeared to hold a covered position that was not disclosed, we asked for an explanation during the interview 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 differ slightly from the minimum percentage estimates presented in prior reports.

The Justice Against Corruption on K Street Act of 2018 (also known as the JACK Act) amended the Lobbying Disclosure Act of 1995 and requires that lobbyists disclose in their registrations and quarterly disclosure reports whether individual lobbyists have been convicted of certain criminal acts at the state or federal level. Offenses include bribery, extortion, embezzlement, an illegal kickback, tax evasion, fraud, conflict of interest, making false statements, perjury, or money laundering.

For any individual lobbyist who has been convicted of these offenses, lobbyists must provide the date of the conviction and a description of the offense. Lobbyists were required to begin disclosing this information in

their first quarter 2019 LD-2 reports. For each individual lobbyist listed on LD-2 reports filed in 2020, we conducted a search to determine whether lobbyists properly disclosed their criminal convictions as required by the LDA. We researched lobbyists' websites, LinkedIn, and Google to positively identify individual lobbyists. Once we positively identified individual lobbyists, we searched Accurint and Clear, two databases that compile records obtained from public and private sources, for any available information regarding criminal arrests or convictions. Where those search results were unclear, we followed up with criminal background checks. We then compared the results of our searches against criminal offenses specified by the JACK Act.

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 lobbyist listed on the LD-2 reports in our random sample. Although this review represents a random selection of lobbyists, 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 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 2019 and the first and second quarters of 2020, 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 3,798, or 90.82 percent, of the 4,182 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 29,447 total LD-203 reports. The first sample contains 80 reports of the 8,835 reports with political contributions and the second contains 80 reports of the 20,612 reports listing no contributions. Each sample contains 40 reports from the year-end 2019 filing period and 40 reports from the midyear 2020 filing period. The samples from 2020 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, we conducted tests of significance for changes from 2011 to 2020 and found no statistically significant differences after adjusting for multiple comparisons.⁵

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.

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 lobbyists to explain why the contribution was not listed on the LD-203 report or to provide documentation of those contributions. To ensure the accuracy of this process, we incorporated intermediate review steps and inter-rater reliability processes, including consulting with general counsel.

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

⁵We used a Bonferroni adjustment to adjust for three comparisons to account for the ten pairwise tests for each item examined.

were omitted because they tended 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 129 different lobbyists included in our sample on any challenges to compliance. The number of different lobbyists is 129—less than our original sample of 148 reports—because some lobbyists had more than one LD-2 report included in our sample. The number is higher than in prior years because we included 12 additional LD-2 reports for each quarter in case of lower response rates due to the Coronavirus 2019 (COVID) pandemic. We calculated responses based on the number of different lobbyists that we contacted rather than the number of interviews. Prior to our calculations, we removed the duplicate lobbyists 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 largest assigned case identification number.

To obtain lobbyists' 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.⁶

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

The mandate does not require us to identify lobbyists who failed to register and report in accordance with the LDA requirements or to 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.

⁶Seven lobbyists did not respond to the question about their ease of understanding the terms associated with LD-2 reporting requirements.

**Appendix III: Objectives, Scope, and
Methodology**

We conducted this performance audit from April 2020 to April 2021 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, Shirley Hwang (Assistant Director), Clifton G. Douglas, Jr. (Assistant Director), Hannah Laufe (Assistant General Counsel), Sherrice Kerns (Analyst-in-Charge), James Ashley, Michael Bechetti, Jazzmin Cooper, Daniel Bibeault, Jeffrey DeMarco, Lydia Koeller, Amalia Konstas, Krista Loose, Amanda Miller, Sharon Miller, Laurel Plume, Bryan Sakakeeny, Susan Sato, Wesley Sholtes, Peter Verchinski, John Villecco, and Khristi Wilkins made key contributions to this report.

Assisting with lobbyist file reviews were Chloe Kay, Alan Rozzi, Mark Ryan, and Jessica Walker.

Appendix V: Accessible Data

Data Tables

Accessible Data for Figure 2: Comparison of Newly Filed Lobbying Registrations to Initial Lobbying Disclosure Reports, 2011 through 2020

Filing year	Did not file LD-2 report	Filed LD-2 report
2011	12	88
2012	10	90
2013	4	96
2014	10	90
2015	12	88
2016	10	90
2017	13	87
2018	8	92
2019	10	90
2020	9	91

Sources: GAO analysis. | GAO-21-375

Accessible Data for Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure Reports with Documentation for Income and Expenses, 2011 through 2020

Filing year	No documentation	Documentation
2011	7	93
2012	3	97
2013	4	96
2014	7	93
2015	8	92
2016	17	83
2017	1	99
2018	3	97
2019	5	95
2020	1	99

Sources: GAO analysis. | GAO-21-375

Accessible Data for Figure 4: Estimated Percentage of Lobbying Disclosure Reports with Differences in Reported and Documented Amount of Income and Expenses, 2011 through 2020

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
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
2019	9	23	69
2020	3	21	76

Sources: GAO analysis. | GAO-21-375

Accessible Data for Figure 5a: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2011 through 2020 (data for general issue areas)

Year or review	Documentation for all issue codes	Documentation for some issue codes	No documentation for issue codes
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
2019	83	13	4
2020	84	11	4

Accessible Data for Figure 5b: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2011 through 2020 (data for individual lobbyists listed)

Year of review	No documentation for lobbyists	Documentation for some	Documentation for all
2011	15	17	68
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
2019	2	29	69
2020	3	33	64

Accessible Data for Figure 5c: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2011 through 2020 (data for lobbying the House of Representatives)

Year of review	No documentation for lobbying the House	Documentation for lobbying the House
2011	19	81
2012	29	71
2013	26	74
2014	11	89
2015	24	76
2016	12	88
2017	3	97
2018	4	96
2019	2	98
2020	7	93

Accessible Data for Figure 5d: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2011 through 2020 (data for lobbying the U.S. Senate)

Year of review	No documentation for lobbying the Senate	Documentation for lobbying the Senate
2011	22	78
2012	28	72
2013	25	75
2014	10	90
2015	17	83
2016	16	84
2017	3	97
2018	3	97
2019	7	93
2020	17	83

Sources: GAO analysis of survey results. | GAO-21-375

Accessible Data for Figure 6: Extent to Which Lobbyists Filed Contribution Reports for All Listed Lobbyists, 2011 through 2020

Filing year	Did not file reports for one or more lobbyists	Filed reports for all lobbyists
2011	14	86
2012	15	85
2013	8	92
2014	6	94
2015	15	85
2016	6	94
2017	7	93
2018	0	100
2019	0	100
2020	3	97

Sources: GAO analysis. | GAO-21-375

Accessible Data for Figure 7: Estimated Percentage of Lobbying Disclosure Reports Where Lobbyists Did Not Appear to Have Properly Disclosed One or More Covered Positions, 2011 through 2020

Year	Not disclosed	Disclosed
2011	17	83
2012	22	78
2013	17	83
2014	14	86
2015	21	79
2016	15	85
2017	15	85
2018	19	81
2019	20	80
2020	29	71

Sources: GAO analysis. | GAO-21-375

Accessible Data for Figure 8: Ease of Complying with Lobbying Disclosure Requirements, 2013 through 2020

Year	Somewhat difficult or very difficult	Somewhat easy	Very easy
2013	9	20	59
2014	13	16	54
2015	10	23	42
2016	5	14	52
2017	13	40	34
2018	11	61	24
2019	12	58	25
2020	11	71	40

Sources: GAO analysis of survey results. | GAO-21-375

Appendix V: Accessible Data

Accessible Data for Figure 9a: Ease of Understanding Key Lobbying Terms, 2013 through 2020 (data for lobbying definitions)

Year	Somewhat difficult	Somewhat easy	Very easy
2013	7	34	47
2014	16	18	50
2015	6	26	39
2016	10	23	40
2017	13	38	36
2018	9	56	31
2019	17	47	31
2020	8	63	50

Accessible Data for Figure 9b: Ease of Understanding Key Lobbying Terms, 2013 through 2020 (data for lobbying activities)

Year	Somewhat difficult	Somewhat easy	Very easy
2013	10	30	49
2014	18	19	47
2015	9	24	39
2016	10	27	36
2017	14	40	32
2018	7	61	28
2019	14	46	34
2020	10	59	52

Accessible Data for Figure 9c: Ease of Understanding Key Lobbying Terms, 2013 through 2020 (data for terminating lobbyists)

Year	Somewhat difficult	Somewhat easy	Very easy
2013	8	33	34
2014	15	32	25
2015	8	25	27
2016	10	30	27
2017	11	32	41
2018	12	42	40
2019	11	42	40
2020	10	52	58

Accessible Data for Figure 9d: Ease of Understanding Key Lobbying Terms, 2013 through 2020 (Data for Lobbying Issue Codes)

Year	Somewhat difficult	Somewhat easy	Very easy
2013	11	37	40
2014	8	43	32
2015	6	30	37
2016	7	31	35
2017	7	36	43
2018	12	45	39
2019	15	39	40
2020	10	64	48

Accessible Data for Figure 9e: Ease of Understanding Key Lobbying Terms, 2013 through 2020 (Data for Covered Positions)

Year	Somewhat difficult	Somewhat easy	Very easy
2013	13	31	38
2014	10	43	29
2015	5	26	38
2016	8	34	30
2017	7	34	45
2018	9	45	41
2019	14	41	38
2020	12	51	59

Sources: GAO analysis of survey results. | GAO-21-375

Appendix V: Accessible Data

Accessible Data for Figure 10: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure Reporting, 2010 through 2020

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2010	446	373	63	10	351
2011	404	255	149	0	483
2012	451	175	276	0	346
2013	519	180	337	2	459
2014	380	113	267	0	241
2015	301	60	241	0	56
2016	302	44	254	4	12
2017	436	60	374	2	36
2018	361	129	232	0	130
2019	285	39	246	0	259
2020	71	11	60	0	19
Totals	3956	1439	2499	18	2392

Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Appendix V: Accessible Data

Accessible Data for Figure 11: Status of Lobbying Disclosure Act Referrals for Lobbying Disclosure, Lobbying Firms Only, 2010 through 2019

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2010	328	233	95	0	180
2011	403	278	125	0	301
2012	345	160	184	1	290
2013	367	137	228	2	200
2014	309	126	181	2	273
2015	340	74	264	2	183
2016	191	54	130	7	3
2017	120	64	56	0	129
2018	263	60	203	0	209
2019	143	10	133	0	134
2020	0	0	0	0	0
Totals	2809	1196	1599	14	1902

Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Appendix V: Accessible Data

Accessible Data for Figure 12: Status of Lobbying Disclosure Act Referrals for Individual Lobbyists Employed at Lobbying Firms, 2010 through 2019

Filing year	Referrals received	Referrals now compliant	Referrals pending further action	Referrals suspended or with deceased lobbyist	Enforcement actions on referrals received
2010	1,228	691	529	8	649
2011	446	204	242	0	412
2012	645	239	406	0	335
2013	417	203	214	0	258
2014	476	119	357	0	158
2015	420	77	343	0	91
2016	858	162	693	3	128
2017	784	118	665	1	470
2018	854	105	749	0	391
2019	910	51	859	0	40
2020	0	0	0	0	0
Totals	7,038	1,969	5,057	12	2,932

Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

Accessible Data for Figure 13: Status of Compliance for Lobbying Disclosure Referrals of Individual Lobbyists, 2010 through 2019

Filing year	Number of lobbyists on referrals received	Lobbyist now compliant on referrals received	Lobbyists still pending on referrals received
2010	1,810	1073	737
2011	541	254	287
2012	758	294	464
2013	484	240	244
2014	542	137	405
2015	519	94	425
2016	987	189	798
2017	994	161	833
2018	1,061	145	916
2019	1,143	69	1074
2020	0	0	0
Totals	8,839	2,656	6,183

Source: U.S. Attorney's Office for the District of Columbia. | GAO-21-375

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.

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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.

Related GAO Products

2018 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements. [GAO-19-357](#), Washington, D.C.: March 29, 2019.

2019 Lobbying Disclosure Observations on Lobbyists' Compliance with Disclosure Requirements. [GAO-20-449](#), Washington, D.C.: March 31, 2020.

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