



# 2024 LOBBYING DISCLOSURE Observations on Compliance with Requirements

Report to Congressional Requesters

April 2025

GAO-25-107523

United States Government Accountability Office

Accessible Version

# GAO Highlights

GAO Highlights For more information, contact Yvonne D. Jones at [JonesY@gao.gov](mailto:JonesY@gao.gov).

Highlights of [GAO-25-107523](#), a report to congressional committees

April 2025

## 2024 LOBBYING DISCLOSURE Observations on Compliance with Requirements

### Why GAO Did This Study

The Lobbying Disclosure Act of 1995, as amended, requires lobbyists to file quarterly lobbying disclosure reports and semiannual contribution reports, among other requirements. The law includes a provision for GAO to annually audit the extent of lobbyists' compliance with the act.

This report (1) determines the extent to which lobbyists demonstrated compliance with disclosure requirements, (2) identifies challenges or potential improvements to compliance that lobbyists report, and (3) describes the efforts of the U.S. Attorney's Office for the District of Columbia in enforcing compliance. This report is GAO's 18th annual review under the provision.

GAO reviewed a stratified random sample of 100 quarterly lobbying disclosure reports filed for the third and fourth quarters of calendar year 2023 and the first and second quarters of calendar year 2024. GAO also reviewed a random sample of 160 contribution reports from year-end 2023 and midyear 2024. This methodology allowed GAO to generalize to the population of 67,577 quarterly disclosure reports with \$5,000 or more in lobbying activity and 35,034 contribution reports. In addition, through a survey, GAO obtained the views of 99 different lobbyists on any challenges or potential improvements to aid compliance. GAO also interviewed U.S. Attorney's Office officials.

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

### What GAO Found

Most lobbyists provided documentation for key elements of their disclosure reports to demonstrate compliance with the Lobbying Disclosure Act of 1995, as amended. For the third and fourth quarters of 2023 and the first and second quarters of 2024, GAO estimates that

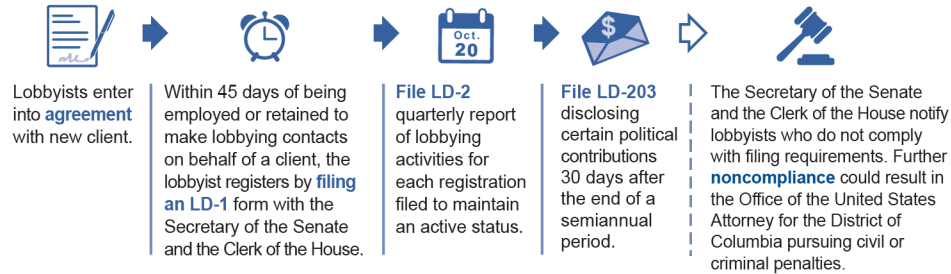
- 97 percent of lobbyists who filed new registrations also filed quarterly lobbying disclosure reports as required for the quarter in which they first registered,
- 93 percent of lobbyists who filed quarterly lobbying disclosure reports provided documentation for lobbying income and expenses, and
- 95 percent of semiannual contribution reports included all reportable political contributions.

These findings are generally consistent with GAO's findings since 2015.

Lobbyists are required to report certain criminal convictions. GAO found that, of the 258 individual lobbyists in its sample, none failed to report a conviction.

The figure below describes the typical filing and enforcement processes.

## Typical Lobbying Disclosure Process



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. GAO (icons). | GAO-25-107523

GAO found that most lobbyists surveyed reported some level of ease in complying with quarterly disclosure requirements and in understanding the definitions of terms used in quarterly lobbying disclosure reports. However, based on GAO's estimates, 21 percent of quarterly lobbying disclosure reports included individual lobbyists who had not properly disclosed covered positions—certain jobs in the executive and legislative branches—as required.

To bring lobbyists into compliance, the U.S. Attorney's Office for the District of Columbia continues to contact lobbyists who have not filed their disclosure reports. From 2015 through 2024, the office received 3,566 referrals from the Secretary of the Senate and the Clerk of the House for failure to file quarterly lobbying disclosure reports. As of December 2024, about 36 percent of these referrals were closed as in compliance, and about 63 percent were pending further action.

# Contents

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GAO Highlights	ii
<b>Why GAO Did This Study</b>	ii
<b>What GAO Found</b>	ii

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Letter	1
Background	3
Most Lobbyists Are Complying with Federal Lobbying Disclosure Requirements	7
Most Lobbyists Reported Some Level of Ease in Complying with Quarterly Lobbying Disclosure Requirements	17
U.S. Attorney’s Office for the District of Columbia Continues to Enforce the Lobbying Disclosure Act	20
Agency Comments	29

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Appendix I	List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports	31
Appendix II	List of Lobbyists from the Random Sample of Contribution (LD-203) Reports	37
Appendix III	Objectives, Scope, and Methodology	42
Appendix IV	GAO Contact and Staff Acknowledgments	47
	GAO Contact	47
	Staff Acknowledgments	47

---

Related GAO Products	48
----------------------	----

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Tables	
Table 1: Reasons Lobbyists in Our Sample Amended Their Quarterly Lobbying Disclosure (LD-2) Reports, August 2024 to December 2024	16
Table 2: Numbers and Percentages of Contribution (LD-203) Reports That Omitted One or More Political Contributions, 2015—2024	17
Table 3: Names of Lobbyists and Clients Listed on Random Sampling of Quarterly Lobbying Disclosure (LD-2) Reports Filed for the Third and Fourth Quarters of 2023 and First and Second Quarters of 2024	31
Table 4: Names of Lobbyists Listed on Random Sampling of Contribution (LD-203) Reports with Contributions Listed, Filed Year-End 2023 or Midyear 2024	37

Table 5: Names of Lobbyists Listed on Random Sampling of Contribution (LD-203) Reports Without Contributions Listed, Filed Year-End 2023 or Midyear 2024	39
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Figures

Figure 1: Typical Lobbying Disclosure Process	4
Figure 2: Comparison of Newly Filed Lobbying Registrations (LD-1) to Initial Quarterly Lobbying Disclosure (LD-2) Reports, 2015—2024	8
Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses, 2015—2024	9
Figure 4: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses, 2015—2024	10
Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2015—2024	12
Figure 6: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports Where Listed Lobbyists Filed Contribution (LD-203) Reports for Their Organizations and Individual Lobbyists, 2015—2024	14
Figure 7: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports Where Listed Individual Lobbyists May Not Have Properly Disclosed One or More Covered Positions, 2015—2024	15
Figure 8: Ease of Complying with Quarterly Lobbying Disclosure (LD-2) Requirements, 2015—2024	18
Figure 9: Ease of Understanding Key Lobbying Terms, 2015—2024	19
Figure 10: Overview of the Process for Addressing Noncompliance with the Lobbying Disclosure Act	22
Figure 11: Status of Lobbying Disclosure Act Referrals for Failure to File Quarterly Lobbying Disclosure (LD-2) Reports, 2015—2024 (as of December 2024)	24
Figure 12: Status of Lobbying Disclosure Act LD-203(R) Referrals for Lobbying Firms' Failure to File Contribution Reports, 2015—2024 (as of December 2024)	26
Figure 13: Status of Lobbying Disclosure Act LD-203 Referrals for Lobbying Firms That Employ Individual Lobbyists Who Failed to File Contributions Reports, 2015—2023 (as of December 2024)	27

Abbreviations

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, 2025

## 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.<sup>1</sup> 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 annually audit the extent of lobbyists' compliance with the Lobbying Disclosure Act of 1995, as amended (LDA), by reviewing publicly available lobbying registrations and other matters.<sup>2</sup> This is our 18th report under this provision.<sup>3</sup>

As with our prior reports, our objectives were to (1) determine the extent to which lobbyists demonstrated compliance with LDA disclosure requirements for reports filed in 2023-2024, and describe how that compliance compares with prior years; (2) identify the challenges or improvements lobbyists report in complying with LDA disclosure requirements; and (3) describe the resources and authorities available to the U.S. Attorney's Office for the District of Columbia (USAO) to enforce the LDA, and efforts USAO has made to improve enforcement.<sup>4</sup>

To determine the extent to which lobbyists could demonstrate compliance with reporting requirements, we examined a stratified random sample of 100 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 2023 and the first and second quarters of calendar year 2024.<sup>5</sup>

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<sup>1</sup>Pub. L. No. 110-81, 121 Stat. 735 (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 individual lobbyists.

<sup>2</sup>2 U.S.C. § 1614.

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

<sup>4</sup>For the purposes of this report, we use the term lobbyist to refer to individual lobbyists, lobbying firms (including self-employed individuals who are lobbyists), organizations with in-house lobbyists, or lobbyists' representatives who met with us during our review, unless noted otherwise. We group these terms together for the ease of reporting.

<sup>5</sup>Our original sample included 116 randomly selected LD-2 reports—25 reports per quarter and four additional reports for each quarter as alternates. We subsequently removed two LD-2s from the sample because the lobbyists associated with them were unable to participate in our review. We also removed three LD-2s because they had no lobbying activity in the sampled quarter. We then selected five LD-2 reports from the pool of alternates and did not use the remaining 11. Appendix I provides a complete list of lobbyists and clients in our original sample of LD-2 reports.

We selected the randomly sampled reports from the publicly downloadable database maintained by the Secretary of the Senate.<sup>6</sup> This methodology allows us to generalize some elements to the population of LD-2 reports. We then surveyed and interviewed each lobbyist in our sample.<sup>7</sup> Our questionnaire asked lobbyists to confirm key elements of LD-2 reports, such as the amount of income or expenses reported for lobbying activities, and whether the lobbyists maintained written documentation for these pieces of information, among other topics.

In our follow-up interviews, we asked lobbyists to provide written documentation for key elements of their LD-2 reports, including

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

We reviewed whether 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 2018 (JACK Act).<sup>8</sup> We also reviewed whether the lobbyists filed semiannual contribution reports listing certain federal political contributions.

To determine whether lobbyists reported their federal political contributions as required by the LDA, we analyzed a stratified random sample of year-end 2023 and midyear 2024 semiannual contribution (LD-203) reports. The sample contains 80 LD-203 reports that list contributions and 80 LD-203 reports that do not. We selected the randomly sampled reports from the publicly downloadable contributions database maintained by the Secretary of the Senate (see appendix II for a list of lobbyists 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.<sup>9</sup> This comparison helped us determine whether all relevant contributions reported in the FEC database were also reported on the LD-203s as required. As needed, we contacted

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<sup>6</sup>Our sample is only one of a large number of samples that we might have drawn. Because each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval. This interval would contain the actual population value for 95 percent of the samples we could have drawn. All 2024 percentage estimates have a maximum 95 percent confidence interval of within 10 percentage points or fewer of the estimate. However, percentage estimates from prior years may have a different maximum margin of error. For prior LD-2 reviews, we have drawn stratified random samples of 25 to 27 cases per quarter to attain 80 to 100 completed cases each review.

<sup>7</sup>Although we contacted each lobbyist in our sample, we did not always meet with the individuals identified as the points of contact or with individual lobbyists identified on the forms. In some instances, we met with individuals representing the lobbyists in our sample.

<sup>8</sup>Pub. L. No. 115-418, 132 Stat. 5440 (2019), *codified* at 2 U.S.C. §§ 1603(b)(7), 1604(b)(6).

<sup>9</sup>FEC is the independent regulatory agency charged with administering and enforcing federal campaign finance law. According to FEC's website, campaign finance law 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. See <https://www.fec.gov/about/mission-and-history/>. FEC has jurisdiction over the financing of campaigns for the U.S. House, Senate, presidency, and vice presidency.



lobbyists to ask them to provide explanations and 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 2023 and the first and second quarters of 2024 to the corresponding LD-2 reports on file with the Secretary of the Senate.

To identify any challenges or potential improvements to compliance, we used a structured web-based survey to obtain views from lobbyists included in our sample of reports. We asked lobbyists how easy or difficult it was to comply with the LD-2 disclosure requirements in general. We also asked them how well they understood lobbying terms such as lobbying activities, terminating lobbyists, issue codes, and covered positions.

To describe the resources and authorities available to USAO and its efforts to improve LDA enforcement, we reviewed USAO documents, analyzed USAO data, and interviewed USAO officials. A more detailed description of our methodology is provided in appendix III.

To assess the reliability of the data we used for this report, we reviewed available documentation, obtained information from knowledgeable officials, and tested and checked the data. We found the data to be sufficiently reliable for the purposes of our reporting objectives.

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

We conducted this performance audit from April 2024 to April 2025 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.

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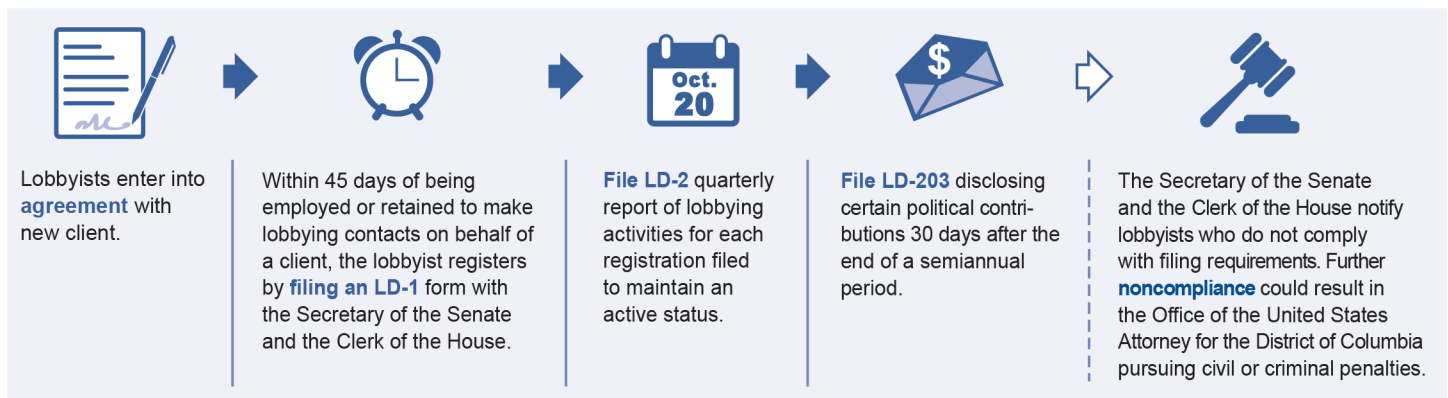
## Background

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 (certain written or oral communication to covered officials, such as a high-ranking agency official or a member of Congress made on behalf of a client), and whose lobbying activities represent at least 20 percent of the time the individual spends on behalf of the client during

the quarter.<sup>10</sup> 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.<sup>11</sup> However, 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), or organizations with in-house lobbyists, unless noted otherwise.<sup>12</sup>

The LDA requires lobbyists to register with the Secretary of the Senate and the Clerk of the House of Representatives and to file quarterly reports disclosing their lobbying activities.<sup>13</sup> Lobbyists are required to file their registrations and reports electronically with the Secretary of the Senate and the Clerk of the House through a single entry point. Registrations and reports must, to the extent practicable, be publicly available in downloadable, searchable databases from the Secretary of the Senate and the Clerk of the House. Figure 1 provides an overview of the registration and filing process.

**Figure 1: Typical Lobbying Disclosure Process**



Source: GAO analysis of the Lobbying Disclosure Act of 1995, as amended. GAO (icons). | GAO-25-107523

Lobbyists are required to register with the Secretary of the Senate and the Clerk of the House by completing an LD-1 form for each client if the lobbyists receive or expect to receive more than \$3,500 in income in a

<sup>10</sup> 2 U.S.C. § 1602(10). The LDA defines a covered executive branch official as the President, Vice President, an officer or employee, or any other individual functioning in the capacity of such an officer or employee in the Executive Office of the President; an officer or employee serving in levels I through V of the Executive Schedule; members of the uniformed services whose pay grade is at or above O-7; and any officer or employee serving in a position of a confidential, policy-determining, policy-making or policy-advocating character who is excepted from competitive service as determined by the Office of Personnel Management (commonly called Schedule C employees). 2 U.S.C. § 1602(3). The LDA defines a covered legislative branch official as a member of Congress; an elected officer of either house of Congress; any employee, or any other individual functioning in the capacity of an employee, of a member of Congress, 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; or any other legislative branch employee serving in a position described under section 109(13) of the Ethics in Government Act of 1978. 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).

<sup>11</sup> 2 U.S.C. § 1602(9). A self-employed individual who is a lobbyist is also included in the LDA definition of a lobbying firm.

<sup>12</sup> In addition, we refer to the individuals who represented lobbyists and who met with us during our review as lobbyists.

<sup>13</sup> The LDA refers to a lobbyist who files an initial registration (LD-1) as a “registrant.” 2 U.S.C § 1603(a)-(d). 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). If 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).

quarterly period from that client for lobbying activities.<sup>14</sup> When registering, lobbyists must identify any affiliated organizations that contribute more than \$5,000 for lobbying in a quarterly period and actively participate in the planning, supervision, or control of the lobbying activities.<sup>15</sup>

Lobbyists are also required to submit a quarterly lobbying disclosure (LD-2) report for each registration filed. The information in LD-2s includes, among other details,

- the name of the client for whom the lobbyist lobbied;
- a list of individuals who acted as lobbyists on behalf of the client during the reporting period;
- whether any new individual lobbyists 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.

No specific statutory requirement exists for lobbyists to generate or maintain documentation in support of the information disclosed in the reports they file. However, guidance issued by the Secretary of the Senate and the

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<sup>14</sup>If 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 for the client. The \$3,500 threshold applies to total income related to lobbying activities on behalf of a client. Organizations employing in-house lobbyists 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 \$16,000 during a quarterly period. Amounts are adjusted for inflation and published in LDA guidance.

<sup>15</sup>2 U.S.C. § 1603(b)(3). The term “affiliated organization” is not found in statute but defined in the LDA guidance. See <https://lobbyingdisclosure.house.gov/ldaguidance.pdf>.

Clerk of the House recommends that lobbyists retain copies of their filings and documentation supporting reported income or expenses for at least 6 years after they file their reports.

In January 2019, the JACK Act was enacted.<sup>16</sup> The JACK Act amended the LDA. It requires that lobbyists disclose in their lobbying registrations and quarterly lobbying disclosure reports whether individual lobbyists have been convicted of certain criminal acts at the federal or state 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 to provide the date of conviction and a description of the offense in the lobbying registration and 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 periodically.<sup>17</sup> It was last revised on February 28, 2025, to update registration thresholds reflecting changes in the Consumer Price Index.

The guidance provides definitions of LDA terms, elaborates on registration and reporting requirements, includes specific examples of different disclosure scenarios, and explains 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 stated that they email registered lobbyists to provide reminders to file reports by the quarterly and semiannual 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 are to notify lobbyists in writing when they are not complying with LDA reporting requirements. Subsequently, they are to refer to USAO lobbyists who fail to provide an appropriate response within 60 days of being notified. USAO researches these referrals and communicates with the lobbyists by email, phone, or letter to inform them that they are not in compliance and what must be done to reach compliance. 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 conviction could lead to a maximum of 5 years in prison.

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<sup>16</sup>Pub. L. No. 115-418, 132 Stat. 5440 (2019).

<sup>17</sup>Office of the Clerk, U.S. House of Representatives, Secretary of the Senate, U.S. Senate, *Lobbying Disclosure Act Guidance* (Washington, D.C.: Feb. 28, 2025). See <https://lobbyingdisclosure.house.gov/ldaguidance.pdf>.

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## Most Lobbyists Are Complying with Federal Lobbying Disclosure Requirements

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### Lobbyists Filed Quarterly Lobbying Disclosure Reports as Required for Most New Lobbying Registrations

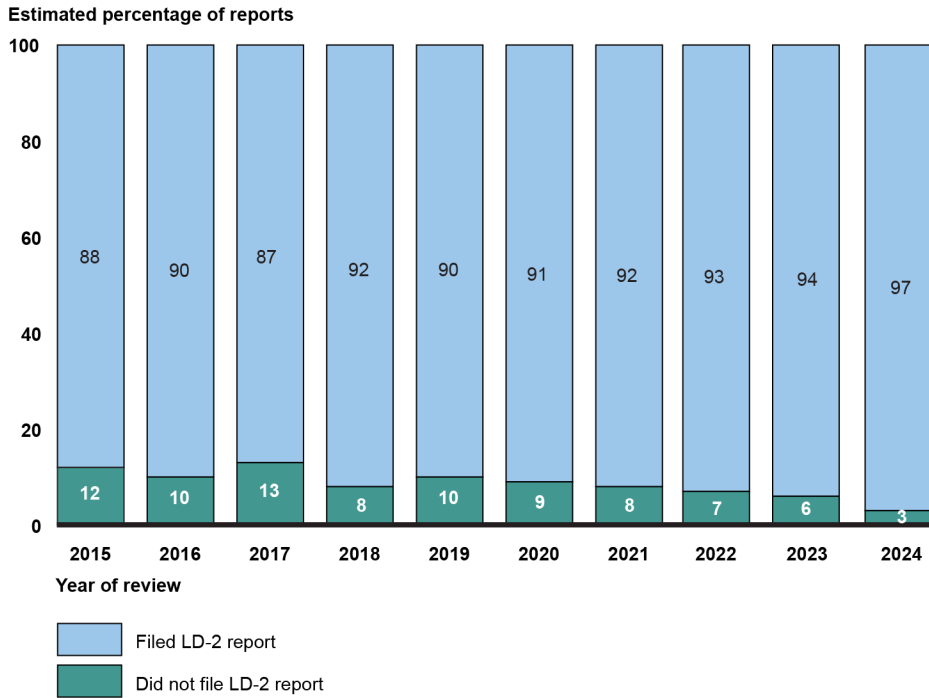
Under the LDA, within 45 days of being employed or retained to make a lobbying contact on behalf of a client, the lobbyist must register by filing an LD-1 form with the Secretary of the Senate and the Clerk of the House.<sup>18</sup> Thereafter, the lobbyist must file quarterly lobbying disclosure (LD-2) reports detailing the lobbying activities. Of the 4,051 new registrations we identified for the third and fourth quarters of 2023 and the first and second quarters of 2024, we identified a matching LD-2 report filed within the same quarter as the registration for 3,926 of them (97 percent).

These results are similar to the findings we have reported in prior reviews. We used the Senate lobbying disclosure database as the source of the reports. We also used an electronic matching algorithm that addresses 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 2015 through 2024.

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<sup>18</sup>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 (LD-1) to Initial Quarterly Lobbying Disclosure (LD-2) Reports, 2015—2024**



Source: GAO analysis of LD-1 and LD-2 reports data. | GAO-25-107523

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Filed LD-2 report	88	90	87	92	90	91	92	93	94	97
Did not file LD-2 report	12	10	13	8	10	9	8	7	6	3

As part of their regular compliance procedures, the Secretary of the Senate and the Clerk of the House are to follow up with lobbyists who filed new registrations if quarterly reports were not also filed. If the Secretary of the Senate and the Clerk of the House are unsuccessful in bringing the lobbyist into compliance, they must refer those cases to USAO.

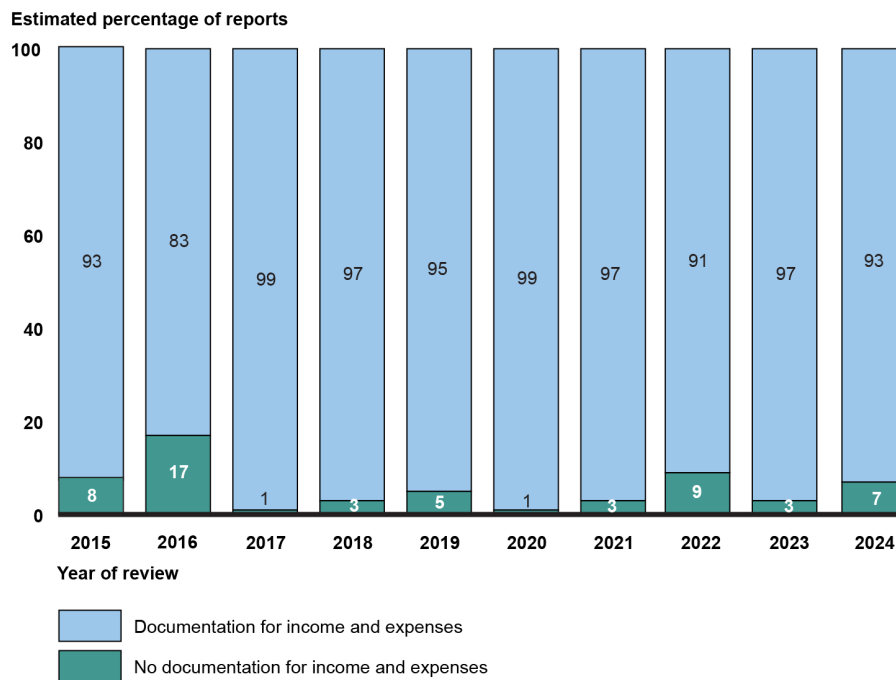
### For Most Quarterly Lobbying Disclosure Reports, Lobbyists Provided Documentation for Key Elements, Including Income and Expenses

For selected elements of lobbyists’ LD-2 reports in our sample that can be generalized to the population of lobbying reports, our findings have generally been consistent from year to year.<sup>19</sup> Most lobbyists reporting \$5,000 or more in income or expenses provided written documentation to varying degrees for the reporting elements in their disclosure reports.

<sup>19</sup>To 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.

Figure 3 shows that lobbyists provided documentation for income and expenses for most sampled LD-2 reports from 2015 through 2024.<sup>20</sup> Our 2024 estimate does not represent a statistically significant change from 2023.<sup>21</sup>

**Figure 3: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Documentation for Income and Expenses, 2015—2024**



Source: GAO analysis of LD-2 reports and lobbyists' documentation. | GAO-25-107523

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Documentation for income and expenses	93	83	99	97	95	99	97	91	97	93
No documentation for income and expenses	8	17	1	3	5	1	3	9	3	7

Note: Estimated percentages have a margin of error of 10 percentage points or fewer. For 2015, percentages do not total 100 due to rounding.

For LD-2 reports where lobbyists provided supporting documentation for income or expenses, we found that the reported income or expenses amount sometimes differed from the supporting documentation.<sup>22</sup> Figure 4 shows that in 2024, an estimated 4 percent of LD-2 reports had income or expenses amounts that differed by more than \$10,000 from the amounts lobbyists provided to us on their supporting documentation. In addition,

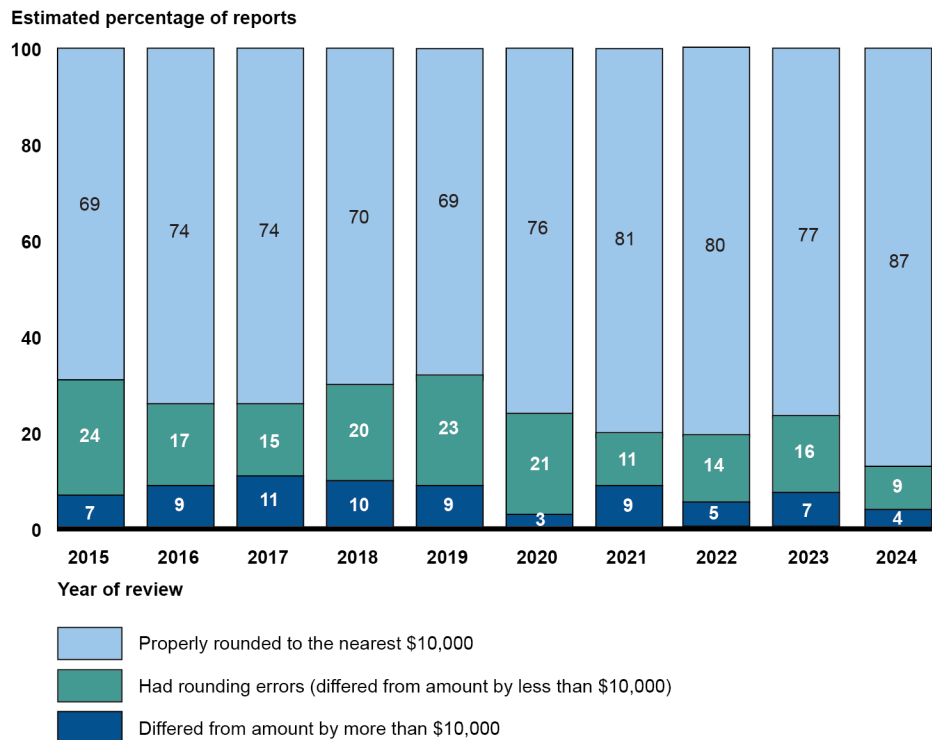
<sup>20</sup>In the last 10 years, the estimated percentage of LD-2 reports whose income and expenses were supported by written documentation has varied. Specifically, our estimates for 2017 (99 percent) and 2023 (97 percent) represented statistically significant increases from 2016 (83 percent). These apparent fluctuations may be attributable to sampling error, given generally consistent findings in other years.

<sup>21</sup>Our inability to detect significant differences may also be related to the nature of our sample, which was relatively small and designed only to ensure reliable estimates for a specific year.

<sup>22</sup>Lobbyists 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, the firm is to include a statement that income or expenses totaled less than \$5,000 for the reporting period. 2 U.S.C. § 1604(c)(2).

we estimated that 9 percent of reports for which lobbyists provided supporting documentation had rounding errors in amounts less than \$10,000 on reported income or expenses.<sup>23</sup> These values do not represent statistically significant changes as compared to 2023. In 2016, the Secretary of the Senate and the Clerk of the House updated guidance to include an additional example about rounding expenses to the nearest \$10,000. Nevertheless, we have found that rounding difficulties have been a recurring issue on LD-2 reports from 2015 through 2024.

**Figure 4: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports with Differences in Reported and Documented Amount of Income and Expenses, 2015–2024**



Source: GAO analysis of LD-2 reports and lobbyists' documentation. | GAO-25-107523

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Properly rounded to the nearest \$10,000	69	74	74	70	69	76	81	80	77	87
Had rounding errors (differed from amount by less than \$10,000)	24	17	15	20	23	21	11	14	16	9
Differed from amount by more than \$10,000	7	9	11	10	9	3	9	5	7	4

Note: Estimated percentages have a maximum margin of error of 12 percentage points or fewer. For 2019, 2021, and 2022, percentages do not total 100 due to rounding.

<sup>23</sup>Our estimate of the number of reports with rounding errors includes reports that disclosed the exact amount of income from or expenditures on lobbying activities but failed to round to the nearest \$10,000 as required.



The LDA requires that lobbyists disclose lobbying contacts made with federal agencies on behalf of the client during the reporting period. This year, of the 100 LD-2 reports in our sample, 36 disclosed lobbying activities at federal agencies. In 26 of those 36 cases, lobbyists provided supporting documentation. Specifically, 16 lobbyists provided documentation for all of their disclosed lobbying activities at federal agencies, and 10 lobbyists provided documentation for some of their disclosed lobbying activities at federal agencies.<sup>24</sup>

Figure 5 shows that, for most LD-2 reports, lobbyists provided documentation for selected elements of their LD-2 reports, such as general issue area codes for lobbying activities, lobbying the Senate and the House, and individual lobbyists listed from 2015 through 2024. Our 2024 estimates do not represent statistically significant changes from 2023.<sup>25</sup>

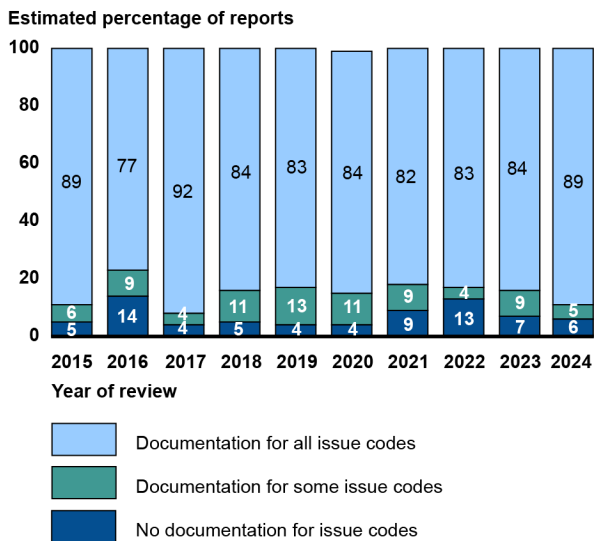
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<sup>24</sup>We could not calculate reliable percentage estimates for this analysis because the smaller subset of cases resulted in a higher margin of error.

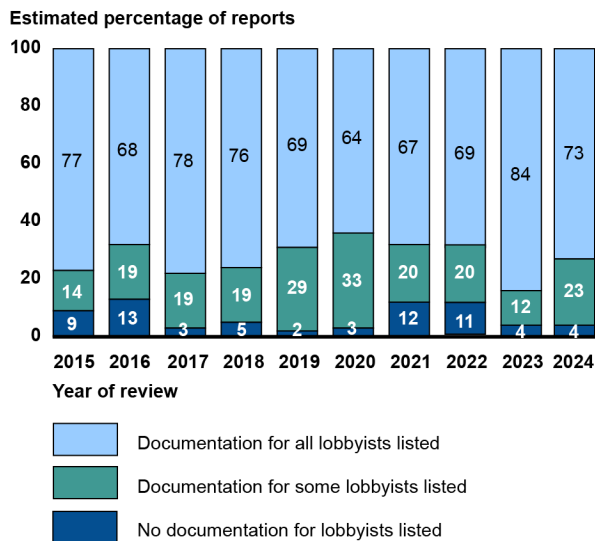
<sup>25</sup>However, in recent years, our findings showed some variation in the estimated percentage of lobbyists who had reports with documentation for lobbying the Senate and the House. In 2022, documentation for lobbying the Senate had statistically significant decreases relative to 2017 and 2018. Similarly, in 2022, documentation for lobbying the House had statistically significant decreases relative to 2017, 2018, and 2019.

**Figure 5: Extent to Which Lobbyists Provided Documentation for Various Reporting Requirements, 2015—2024**

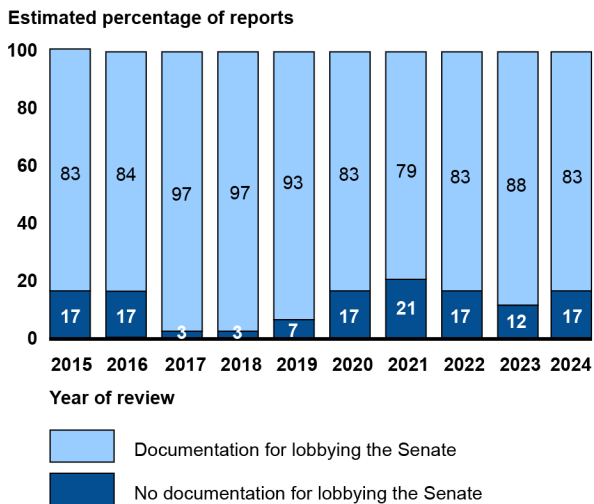
**General Issue Area Codes**



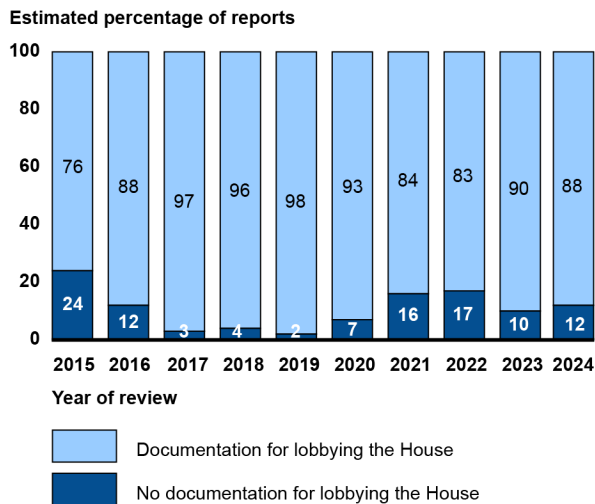
**Individual Lobbyists Listed**



**Lobbying the United States Senate**



**Lobbying the U.S. House of Representatives**



Source: GAO analysis of quarterly lobbying disclosure (LD-2) reports and lobbyists' documentation. | GAO-25-107523

**General Issue Area Codes**

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Documentation for all issue codes	89	77	92	84	83	84	82	83	84	89
Documentation for some issue codes	6	9	4	11	13	11	9	4	9	5
No documentation for issue codes	5	14	4	5	4	4	9	13	7	6

*Individual Lobbyists Listed*

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Documentation for all lobbyists listed	77	68	78	76	69	64	67	69	84	73
Documentation for some lobbyists listed	14	19	19	19	29	33	20	20	12	23
No documentation for lobbyists listed	9	13	3	5	2	3	12	11	4	4

*Lobbying the United States Senate*

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Documentation for lobbying the Senate	83	84	97	97	93	83	79	83	88	83
No documentation for lobbying the Senate	17	17	3	3	7	17	21	17	12	17

*Lobbying the U.S. House of Representatives*

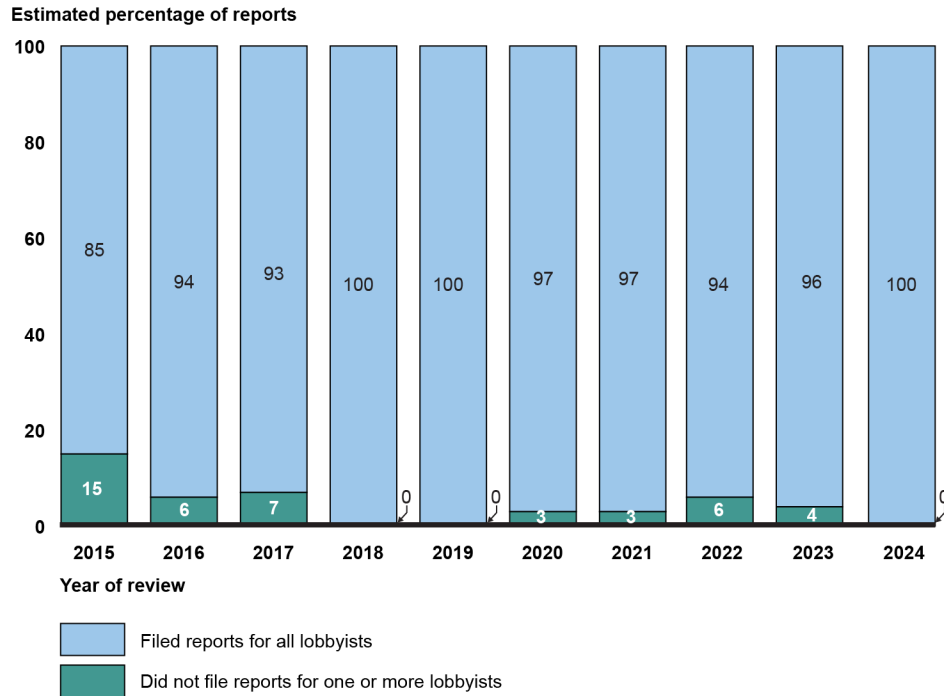
<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Documentation for lobbying the House	76	88	97	96	98	93	84	83	90	88
No documentation for lobbying the House	24	12	3	4	2	7	16	17	10	12

Note: Estimated percentages have a margin of error of 12 percentage points or fewer. For general issue area codes in 2020, individual lobbyists in 2021, and lobbying in the U.S. Senate in 2016, percentages do not total to 100 due to rounding.

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

We estimated that most lobbyists who filed quarterly lobbying disclosure (LD-2) reports for quarters 3 and 4 of 2023 and quarters 1 and 2 of 2024 also filed contribution (LD-203) reports as required. Our findings are consistent with those of prior years (see fig. 6). Individual lobbyists and lobbying firms 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.

**Figure 6: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports Where Listed Lobbyists Filed Contribution (LD-203) Reports for Their Organizations and Individual Lobbyists, 2015—2024**



Source: GAO analysis of LD-2 and LD-203 reports. | GAO-25-107523

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Filed reports for all lobbyists	85	94	93	100	100	97	97	94	96	100
Did not file reports for one or more lobbyists	15	6	7	0	0	3	3	6	4	0

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

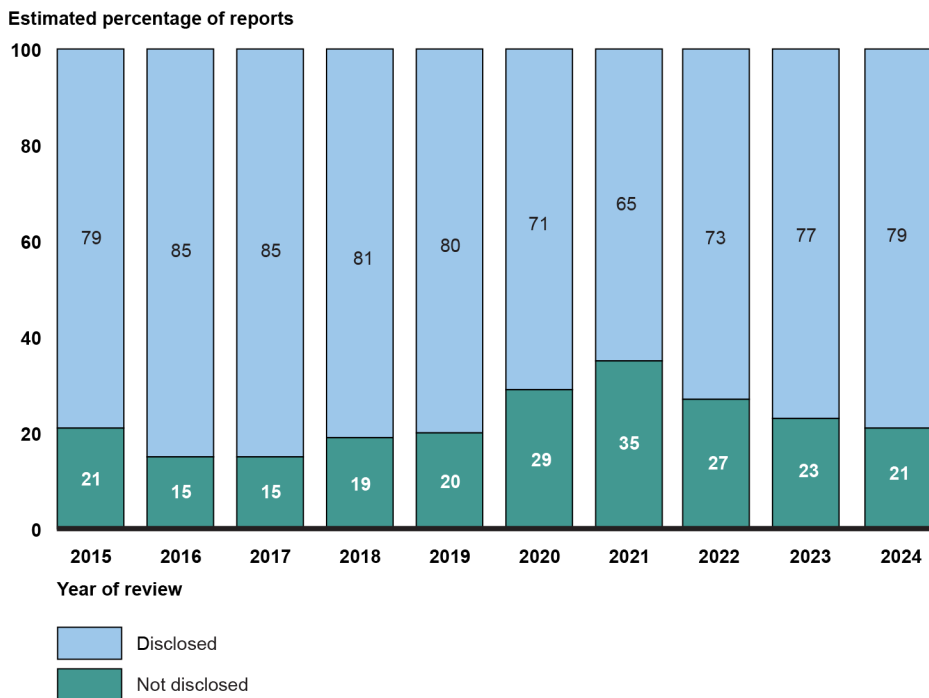
## Some Lobbyists May Not Have Properly Disclosed Their Previously Held Covered Positions

The LDA requires that lobbyists disclose previously held covered positions in the executive or legislative branch, such as high-ranking agency officials and congressional staff. Covered positions can be disclosed either on a lobbying registration (LD-1) report, where lobbyists list the employees who are expected to act as lobbyists on behalf of the new client, or on the quarterly lobbying disclosure (LD-2) filing when adding a new individual lobbyist. For 2024, we estimated that 21 percent of the LD-2 forms included individual lobbyists who had not properly disclosed covered positions as required.<sup>26</sup> This estimate does not represent a statistically significant change from 2023. As in our other reports, these results indicate that some lobbyists may be unclear about the need to disclose certain covered positions, such as paid congressional internships. Figure 7

<sup>26</sup>Prior to each interview, we reviewed the lobbyists' previous work histories by searching sources such as lobbying firms' websites, LinkedIn, LegiStorm, and Google to determine whether lobbyists properly disclosed their covered positions as required by the LDA.

shows the extent to which lobbyists may not have properly disclosed one or more covered positions as required from 2015 through 2024.

**Figure 7: Estimated Percentage of Quarterly Lobbying Disclosure (LD-2) Reports Where Listed Individual Lobbyists May Not Have Properly Disclosed One or More Covered Positions, 2015—2024**



Source: GAO analysis of LD-2 reports, LD-1 reports, and information on lobbyists' work histories. | GAO-25-107523

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Disclosed	79	85	85	81	80	71	65	73	77	79
Not disclosed	21	15	15	19	20	29	35	27	23	21

Note: Estimated percentages have a maximum margin of error of 11 percentage points or fewer. Covered positions can be disclosed either on a lobbying registration (LD-1) report, where lobbyists list the employees who are expected to act as lobbyists on behalf of the new client, or on the LD-2 report when adding a new individual lobbyist.

## Lobbyists Reported No Criminal Convictions on Quarterly Lobbying Disclosure 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 2023 and the first and second quarters of 2024—which together consisted of 258 individual lobbyists—disclosed any convictions in the reports. We researched these lobbyists and found no violations covered by the Justice Against Corruption on K Street Act of 2018.

## Most Lobbyists Did Not Report Working with Affiliated Organizations

Lobbyists must report working with affiliated organizations on the LD-1 or on any LD-2 report. Affiliated organizations are entities that contribute more than \$5,000 for lobbying in a quarterly period and actively participate in the planning, supervision, or control of the lobbying activities.<sup>27</sup> From our sample of LD-2 reports, three lobbyists reported working with an affiliated organization on the LD-1. All three listed the affiliated organizations on their LD-1 reports.<sup>28</sup> Of these three lobbyists, one confirmed working with an affiliated organization during our interview. The other two lobbyists stated that they did not work with affiliated organizations. A fourth lobbyist we interviewed told us they worked with an affiliated organization but had not reported it on the LD-2 in our sample or on the LD-1.<sup>29</sup>

## Some Lobbyists Amended Their Quarterly Lobbying Disclosure Reports After We Contacted Them

Of the 100 LD-2 reports in our sample, lobbyists amended 23 reports to change previously reported information after we contacted them. Of the 23 reports, five were amended after we notified the lobbyists of our review but before we met with them. The remaining 18 reports were amended after we met with the lobbyists to review their documentation. An additional five lobbyists said that they planned to amend their reports after the interview, but had not filed an amendment as of January 2025.

We consistently find a notable number of amended LD-2 reports in our sample each year following notification of our review. These amendments suggest that our contact may spur some lobbyists to scrutinize their reports more closely than they would have without our review. Table 1 lists reasons lobbyists in our sample amended their LD-2 reports after being notified of our review.

**Table 1: Reasons Lobbyists in Our Sample Amended Their Quarterly Lobbying Disclosure (LD-2) Reports, August 2024 to December 2024**

	Number of times reason was selected
Updated income or expenses	7
Changed Senate, House, or executive branch agency lobbying activity	19
Changed general issue area codes lobbied	2
Changed individual lobbyists	5

Source: GAO analysis of LD-2 reports. | GAO-25-107523

Note: Lobbyists amended 23 of the 100 LD-2 reports in our sample. Eight were amended for more than one reason. Data are as of January 2025.

<sup>27</sup>2 U.S.C. § 1603(b)(3). The term “affiliated organization” is not found in statute but defined in the LDA guidance. See <https://lobbyingdisclosure.house.gov/ldguidance.pdf>.

<sup>28</sup>On their lobbying disclosure reports, lobbyists have the option of listing the affiliated organizations or providing a website that lists the affiliated organizations.

<sup>29</sup>Lobbyists are not required to report working with affiliated organizations on every LD-2.

## Most Contribution Reports Disclosed Political Contributions Listed in the Federal Election Commission Database

As part of our review, we compared contributions listed on lobbyists' contribution (LD-203) reports against political contributions reported in the Federal Election Commission database to identify whether relevant 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 found that lobbyists failed to disclose one or more reportable contributions on 13 LD-203 reports in our sample, which represents an estimated 5 percent of all LD-203 reports filed for the second half of 2023 and the first half of 2024. All 13 LD-203 reports were amended in response to our review. Table 2 shows our results from 2015 through 2024.

**Table 2: Numbers and Percentages of Contribution (LD-203) Reports That Omitted One or More Political Contributions, 2015—2024**

Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Number of reports in our sample with contributions that had one or more omissions	11	9	11	9	6	13	8	14	9	12
Number of reports in our sample without contributions that had one or more omissions	0	1	1	0	0	0	3	2	4	1
Estimated percentage of all reports in the population with one or more omissions	4%	5%	6%	4%	2%	5%	6%	7%	7%	5%

Source: GAO analysis of LD-203 reports and Federal Elections Commission data. | GAO-25-107523

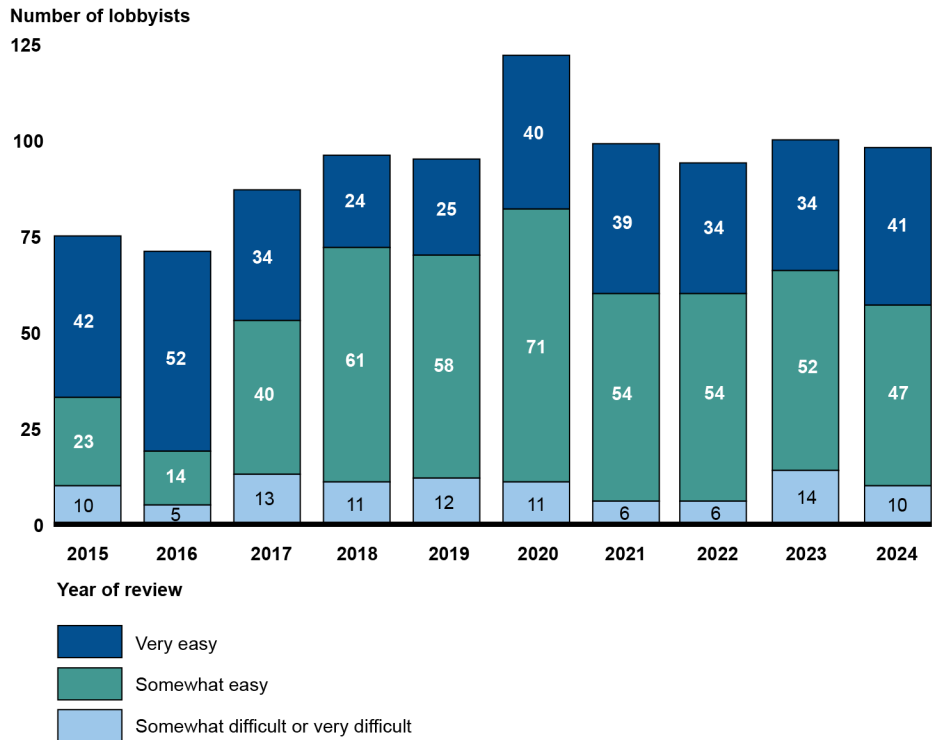
Note: Estimated percentages in the table have a maximum margin of error of 5 percentage points.

## Most Lobbyists Reported Some Level of Ease in Complying with Quarterly Lobbying Disclosure Requirements

Most lobbyists reported that they found it “very easy” or “somewhat easy” to comply with quarterly lobbying disclosure (LD-2) requirements. Of the 99 different lobbyists responding to our survey, 41 reported that complying with the disclosure requirements was “very easy,” 47 reported it was “somewhat easy,” and 10 reported it was “somewhat difficult” or “very difficult” (see fig. 8).<sup>30</sup>

<sup>30</sup>We sent our survey to the lobbyists who filed the 116 LD-2 reports in our sample, but the number of different lobbyists responding to the survey was 99. Two lobbyists did not have lobbying activity and did not complete the survey. One lobbyist was unable to complete the survey due to hardship. Thirteen lobbyists completed more than one survey because they had more than one LD-2 report in our sample; we only included one survey response from each lobbyist. Additionally, some lobbyists may not have responded to all of our survey questions. Therefore, the number of responses may be inconsistent with the number of different lobbyists.

**Figure 8: Ease of Complying with Quarterly Lobbying Disclosure (LD-2) Requirements, 2015—2024**



Source: GAO analysis of survey results. | GAO-25-107523

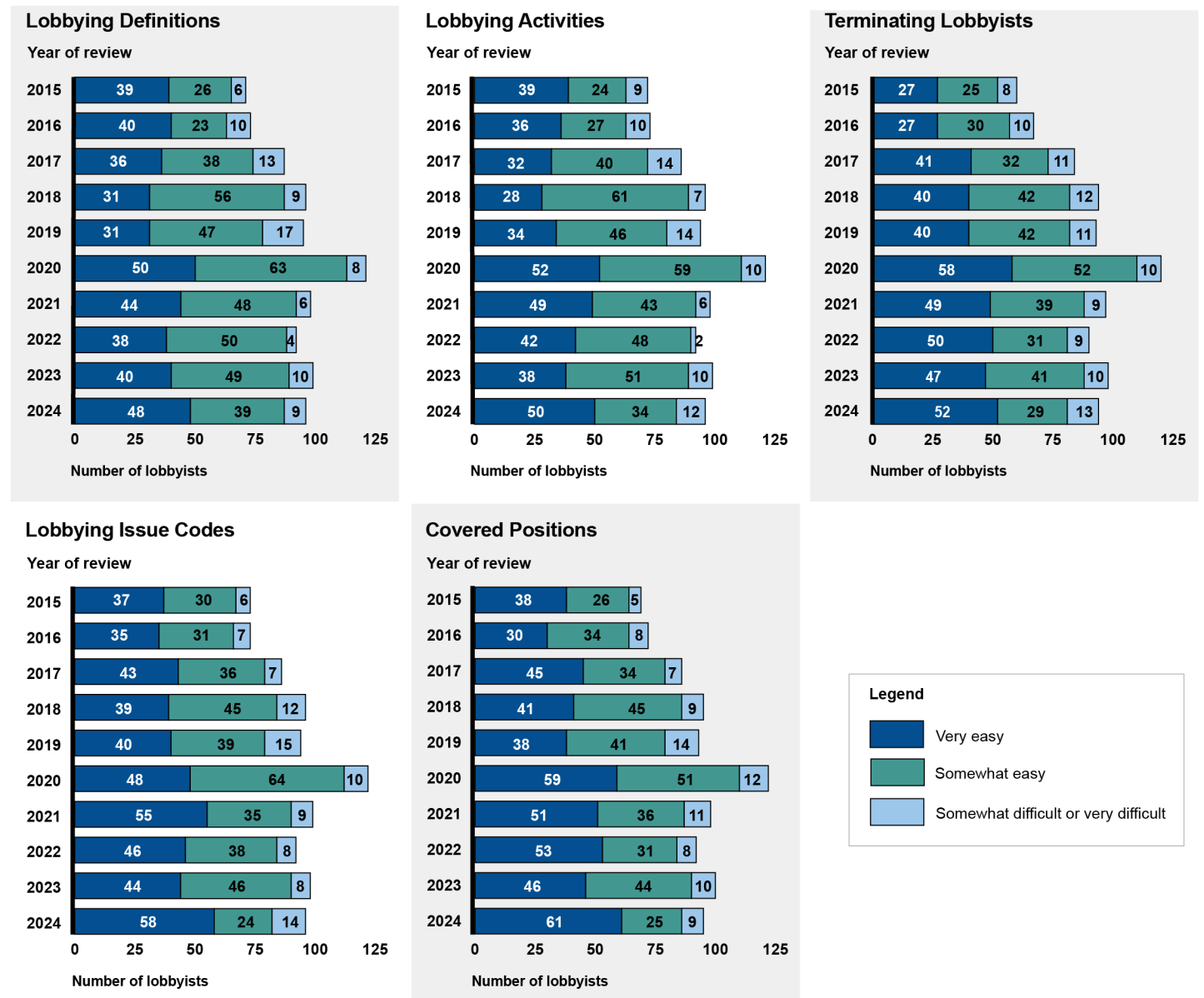
Year of review	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Very easy	42	52	34	24	25	40	39	34	34	41
Somewhat easy	23	14	40	61	58	71	54	54	52	47
Somewhat difficult or very difficult	10	5	13	11	12	11	6	6	14	10

Note: The number of possible responses varies because of changes in sample size over time. 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. Due to the nature of our sample, these results cannot be generalized to the population of lobbyists. For details on our methodology, see appendix III.

Most lobbyists we surveyed rated the definitions of terms used in LD-2 reporting as “very easy” or “somewhat easy” to understand to meet their reporting requirements. Figure 9 shows what lobbyists reported as their ease of understanding the terms associated with LD-2 reporting requirements from 2015 through 2024.



Figure 9: Ease of Understanding Key Lobbying Terms, 2015–2024



Source: GAO analysis of survey results. | GAO-25-107523

**Lobbying Definitions**

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Very easy	39	40	36	31	31	50	44	38	40	48
Somewhat easy	26	23	38	56	47	63	48	50	49	39
Somewhat difficult or very difficult	6	10	13	9	17	8	6	4	10	9

**Lobbying Activities**

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Very easy	39	36	32	28	34	52	49	42	38	50
Somewhat easy	24	27	40	61	46	59	43	48	51	34
Somewhat difficult or very difficult	9	10	14	7	14	10	6	2	10	12

**Terminating Lobbyists**

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Very easy	27	27	41	40	40	58	49	50	47	52
Somewhat easy	25	30	32	42	42	52	39	31	41	29
Somewhat difficult or very difficult	8	10	11	12	11	10	9	9	10	13

**Lobbying Issue Codes**

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Very easy	37	35	43	39	40	48	55	46	44	58
Somewhat easy	30	31	36	45	39	64	35	38	46	24
Somewhat difficult or very difficult	6	7	7	12	15	10	9	8	8	14

**Covered Positions**

<b>Year of review</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Very easy	38	30	45	41	38	59	51	53	46	61
Somewhat easy	26	34	34	45	41	51	36	31	44	25
Somewhat difficult or very difficult	5	8	7	9	14	12	11	8	10	9

Note: The number of possible responses varies because of changes in sample size over time. For example, 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. Due to the nature of our sample, these results cannot be generalized to the population of lobbyists. For details on our methodology, see appendix III.

## U.S. Attorney’s Office for the District of Columbia Continues to Enforce the Lobbying Disclosure Act

### The U.S. Attorney’s Office Has Resources and Authorities to Enforce Lobbying Disclosure Act Compliance

According to officials from the U.S. Attorney’s Office for the District of Columbia (USAO), the following personnel are assigned to enforce reporting requirements under the Lobbying Disclosure Act (LDA):

- two full-time employees—a permanent program compliance coordinator and a civil investigator;

- three paralegal specialists, assigned part time, one of whom was newly assigned in 2024;
- various assistant U.S. attorneys, assigned as needed, to pursue criminal or civil penalties; and
- two unpaid part-time student interns for the fall 2024 semester and new interns for the spring 2025 semester.

USAO, along with the Secretary of the Senate and the Clerk of the House, is responsible for ensuring LDA compliance. USAO's process for enforcing the LDA begins when the Secretary of the Senate or the Clerk of the House sends USAO a referral.<sup>31</sup> Referrals are the notifications indicating that lobbyists have not filed quarterly lobbying disclosure (LD-2) reports or semiannual contributions (LD-203) reports as required by the LDA.<sup>32</sup>

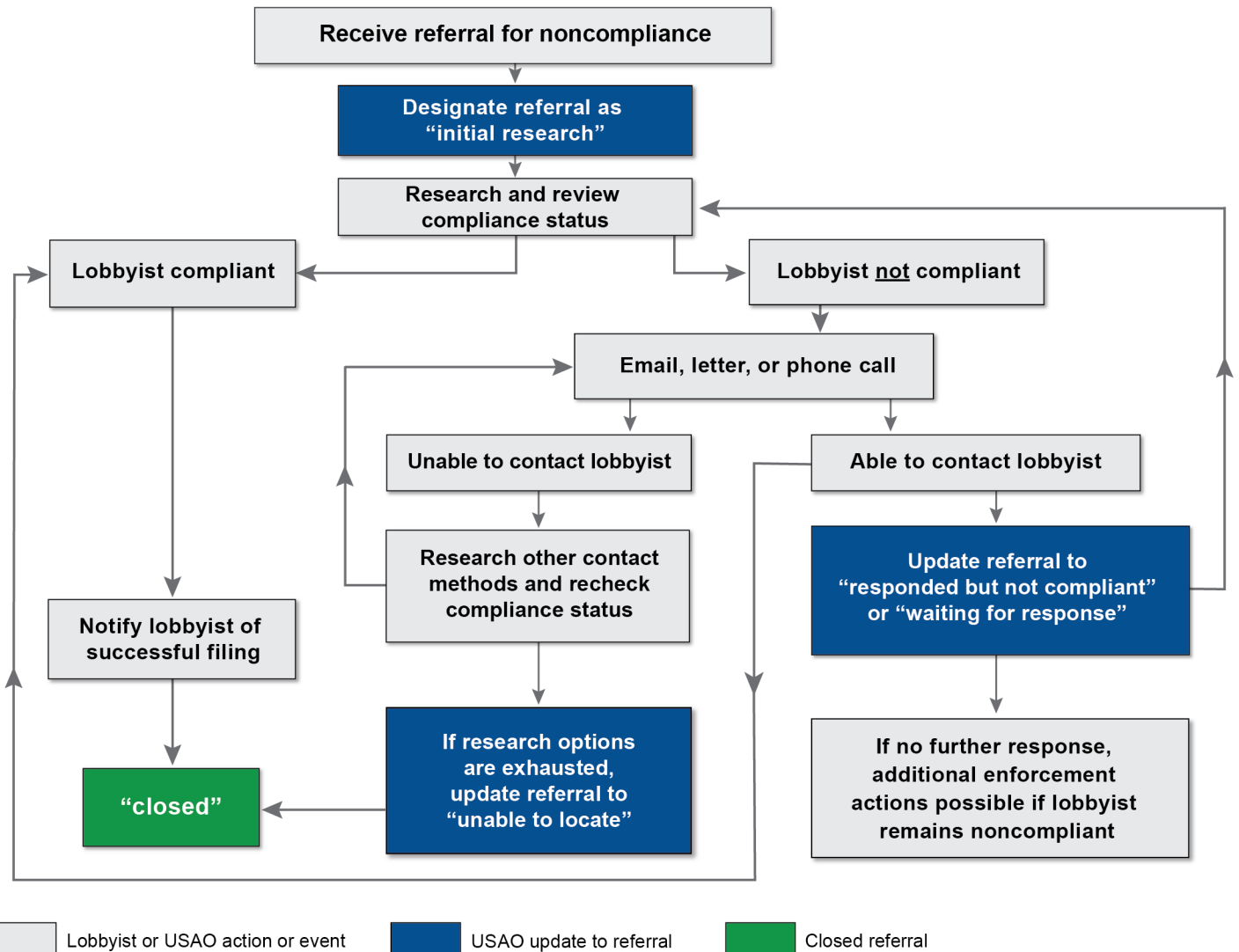
Enforcement actions reflect attempts to bring lobbyists into compliance. These actions include, but are not limited to, sending emails or letters and making phone calls. According to USAO officials, resolving referrals for noncompliance can take anywhere from a few days to years, depending on circumstances. Figure 10 provides an overview of USAO's process for enforcing LDA compliance.

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<sup>31</sup>The Secretary of the Senate or the Clerk of the House notifies lobbyists in writing if they are noncompliant. If the lobbyist fails to comply within 60 days of being notified, the Secretary of the Senate or the House Clerk sends a referral to USAO.

<sup>32</sup>See 2 U.S.C. § 1605(a)(8).

Figure 10: Overview of the Process for Addressing Noncompliance with the Lobbying Disclosure Act



Source: GAO analysis of information from the U.S. Attorney’s Office for the District of Columbia (USAO). | GAO-25-107523

When USAO receives a referral, officials enter it into a database where they track referrals’ status. In the database, USAO officials stated they mark all referrals as pending until they close them and track the status of pending referrals through action codes, such as

- initial research,
- responded but not compliant,
- waiting for a response/no response, and
- unable to locate.

USAO officials initially categorize all pending referrals as “initial research.” During this initial phase, USAO officials research whether the lobbyist is still noncompliant. If the lobbyist has complied, USAO officials said

they close the referral as in compliance. This situation may occur when lobbyists respond to written notifications of noncompliance from the Secretary of the Senate or the Clerk of the House after USAO receives the referral.

If USAO officials find in their initial research that lobbyists for whom they received referrals continue to be noncompliant, they contact the lobbyists by letter, email, or phone.<sup>33</sup> The communications inform the lobbyists that they are noncompliant with the LDA, the actions needed to reach compliance, and the potential consequences for failure to comply.

After USAO officials initially contact the lobbyist, they update the referral in their database based on the lobbyist's response. If officials successfully contact the lobbyist but the lobbyist is not yet compliant, they change the status of the referral to either "responded but not compliant" or "waiting for a response/no response." These referrals remain pending. USAO officials noted that they attempt to review and update cases on a rolling basis. If USAO officials are unable to make contact with the lobbyist after exhausting all options for contacting the lobbyist, they update the referral to "unable to locate" and may designate a reason, such as "bad address" or "deceased." These "unable to locate" referrals are closed. USAO officials said approximately 10 percent of referrals in USAO's database are classified as "unable to locate."

Once USAO officials receive the necessary information to support that the lobbyist is compliant, they send notice to the lobbyist to confirm the lobbyist's successful filing. USAO officials then close the referral as in compliance.

In cases where a 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 required.

USAO considers lobbyists chronic offenders if (1) they repeatedly fail to file LD-2 and LD-203 reports but are allegedly lobbying, and (2) USAO has received more than 10 referrals for them. USAO officials track chronic offenders in their database.<sup>34</sup> They send all chronic offenders "chronic offender letters," which identify all reporting periods where the lobbyist remains noncompliant. In addition, USAO assigns an investigator to review all the facts and circumstances surrounding each chronic offender. If the investigator finds good cause to pursue the case, an attorney is assigned. The assigned attorney is to follow up with the chronic offender and determine the appropriate enforcement actions, which may include a settlement or other civil action.

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## Status of LD-2 Enforcement Efforts

USAO received 3,566 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 2015 through 2024. Figure 11 shows the

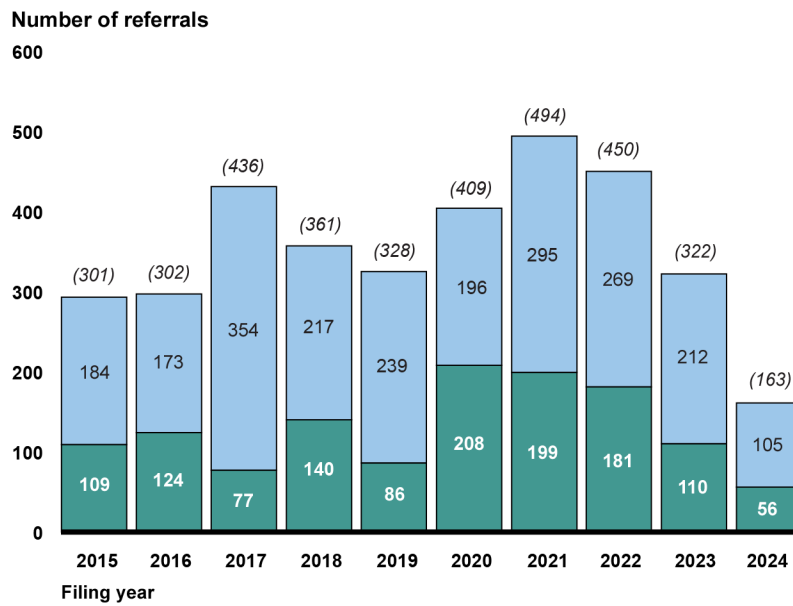
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<sup>33</sup>According to USAO officials, starting in September 2024, they send lobbyists enforcement letters via email and only send enforcement letters by mail only if the email address is invalid and officials cannot find an alternate email address. USAO officials also stated that they are updating their referral database to automatically email enforcement letters to lobbyists through the database rather than manually. They added that they plan to complete this update in 2025.

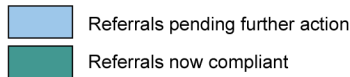
<sup>34</sup>USAO officials stated that they updated their database in summer 2024 to reflect their current definition of chronic offenders. Previously, the database defined chronic offenders as all registrants referred more than twice, including those who later became compliant and those who could not be located.

number and status of the referrals received and the number of enforcement actions taken by USAO to bring lobbyists into compliance. Enforcement actions include letters, emails, and telephone calls.

**Figure 11: Status of Lobbying Disclosure Act Referrals for Failure to File Quarterly Lobbying Disclosure (LD-2) Reports, 2015—2024 (as of December 2024)**



Enforcement actions on referrals received	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	58	16	39	133	263	343	337	414	307	170



Source: U.S. Attorney's Office for the District of Columbia. | GAO-25-107523

Filing year	Number of Referrals Received	Referrals now compliant	Referrals pending further action	Enforcement actions on referrals received
2015	301	109	184	58
2016	302	124	173	16
2017	436	77	354	39
2018	361	140	217	133
2019	328	86	239	263
2020	409	208	196	343
2021	494	199	295	337
2022	450	181	269	414
2023	322	110	212	307
2024	163	56	105	170

Note: According to Secretary of the Senate and Clerk of the House staff, they send most referrals to the U.S. Attorney's Office for the District of Columbia within 6 months of the filing deadline. However, some referrals fall outside this 6-month period. The number of referrals pending further action and the number of referrals now compliant may not sum to the total number of referrals, shown in parentheses. This difference occurs because referrals for lobbyists or clients who are deceased or no longer in business are included in the total number of referrals but are not displayed in the bar chart.

According to USAO data, about 36 percent (1,290 of 3,566) of the total LD-2 referrals received were closed as in compliance as of December 2024, because lobbyists filed their outstanding reports before or after the Department of Justice contacted them. About 63 percent (2,244 of 3,566) of LD-2 referrals were pending further action because USAO could not locate the lobbyists, did not receive a response from the lobbyists after an enforcement action, or planned to conduct additional research to determine if it can locate the lobbyist. The remaining 32 LD-2 referrals (about 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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## Status of LD-203 Enforcement Efforts

Both lobbying firms and the individual lobbyists with each firm are required to file LD-203 reports, which disclose contributions to federal political campaigns, among other details.<sup>35</sup> USAO categorizes referrals for failure to file LD-203s into two types:

1. LD-203(R) referrals for lobbying firms or organizations with in-house lobbyists that failed to file LD-203s disclosing the firms' or organizations' contributions, as required.
2. LD-203 referrals for lobbying firms or organizations with in-house lobbyists whose employees failed to file LD-203s disclosing the individual lobbyists' contributions, as required.

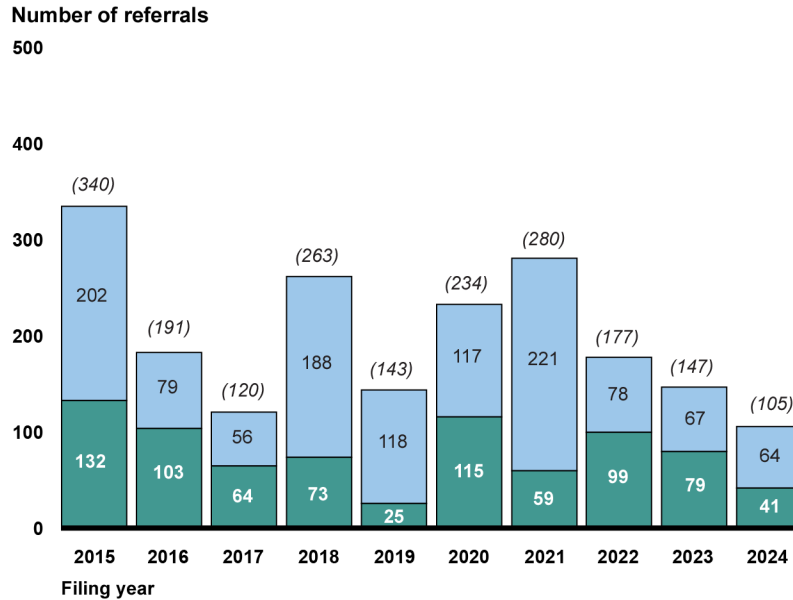
Cumulatively from 2015 through 2024, USAO received 2,000 LD-203(R) referrals. As of December 2024, USAO closed about 40 percent (790 of 2,000) of these LD-203(R) referrals as in compliance because the lobbying firms filed their outstanding reports. About 60 percent (1,190 of 2,000) of the referrals were pending further action. The remaining 20 referrals (1 percent) were suspended because the lobbyist or client was no longer in business, or the lobbyist was deceased.<sup>36</sup> Figure 12 shows the number and status of LD-203(R) referrals received and the number of enforcement actions taken by USAO to bring lobbying firms into compliance.

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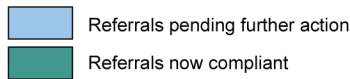
<sup>35</sup>The use of the term "lobbying firms" in this context includes organizations with in-house lobbyists and self-employed individuals. A self-employed lobbyist must file two LD-203s—one in the sole proprietorship business name and one as an individual lobbyist.

<sup>36</sup>Due to rounding, these percentages sum to more than 100.

**Figure 12: Status of Lobbying Disclosure Act LD-203(R) Referrals for Lobbying Firms' Failure to File Contribution Reports, 2015—2024 (as of December 2024)**



Enforcement actions on referrals received	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	189	84	133	209	135	232	164	181	145	24



Source: U.S. Attorney's Office for the District of Columbia. | GAO-25-107523

Filing year	Number of Referrals Received	Referrals pending action	Referrals now compliant	Enforcement actions on referrals received
2015	340	202	132	189
2016	191	79	103	84
2017	120	56	64	133
2018	263	188	73	209
2019	143	118	25	135
2020	234	117	115	232
2021	280	221	59	164
2022	177	78	99	181
2023	147	67	79	145
2024	105	64	41	24

Note: According to Secretary of the Senate and Clerk of the House staff, they send most referrals to the U.S. Attorney's Office for the District of Columbia within 6 months of the filing deadline. However, some referrals fall outside this 6-month period. The number of referrals pending further action and the number of referrals now compliant may not sum to the total number of referrals, shown in parentheses. This difference occurs because referrals for lobbyists or clients who are deceased or no longer in business are included in the total number of referrals but are not displayed in the bar chart.

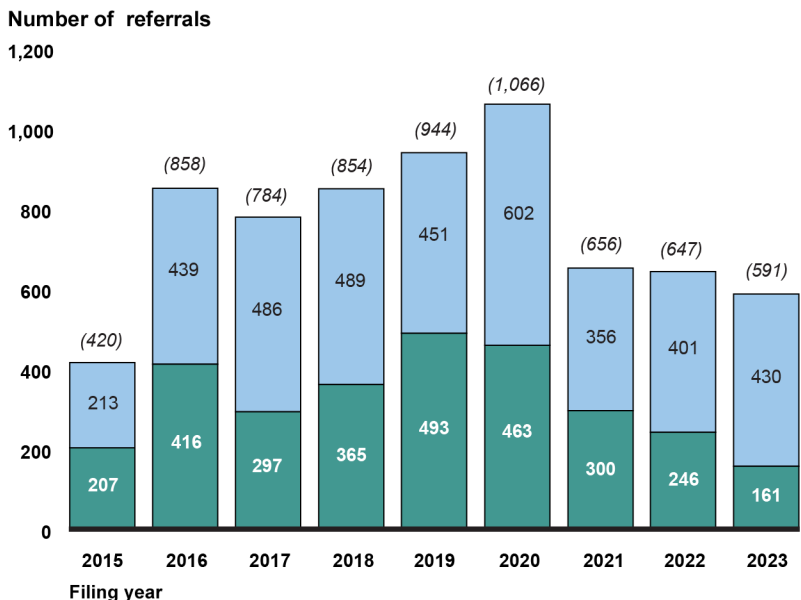
Because LD-203 referrals are addressed to lobbying firms or organizations that employ individual lobbyists who failed to file LD-203s, a single LD-203 referral may list multiple individual lobbyists. For example, if two individual lobbyists employed by the same lobbying firm failed to file their LD-203s, then USAO would receive a



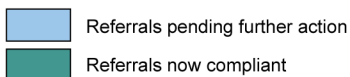
single referral for the lobbying firm with two lobbyists listed. USAO tracks both the number of LD-203 referrals it receives and the number of lobbyists listed on these referrals.

Cumulatively from 2015 through 2023, USAO received 6,820 LD-203 referrals from the Secretary of the Senate and the Clerk of the House for lobbying firms or organizations with in-house lobbyists whose employees failed to file LD-203s disclosing the individual lobbyists' contributions (see fig. 13). As of January 2025, USAO officials have not yet received LD-203 referrals for 2024. Therefore, we have omitted 2024 data in the LD-203 analysis and figure below. Officials expect the Secretary of the Senate and the Clerk of the House to send these referrals in early 2025, similar to previous years.

**Figure 13: Status of Lobbying Disclosure Act LD-203 Referrals for Lobbying Firms That Employ Individual Lobbyists Who Failed to File Contributions Reports, 2015—2023 (as of December 2024)**



<b>Number of lobbyists on referrals received</b>	518	987	993	1,060	1,180	1,243	799	818	716
<b>Enforcement actions on referrals received</b>	102	141	490	428	349	1,014	190	651	592



Source: U.S. Attorney's Office for the District of Columbia. | GAO-25-107523

Filing year	Number of Referrals Received	Referrals now compliant	Referrals pending action	Enforcement actions on referrals received	Number of lobbyists on referrals received
2015	420	207	213	102	518
2016	858	416	439	141	987
2017	784	297	486	490	993
2018	854	365	489	428	1,060
2019	944	493	451	349	1,180
2020	1,066	463	602	1,014	1,243
2021	656	300	356	190	799
2022	647	246	401	651	818
2023	591	161	430	592	716

Note: As of December 2024, no referrals had been received for 2024. According to Secretary of the Senate and Clerk of the House staff, they send most referrals to the U.S. Attorney’s Office for the District of Columbia within 6 months of the filing deadline. However, some referrals fall outside this 6-month period. The number of referrals pending further action and the number of referrals now compliant may not sum to the total number of referrals, shown in parentheses. This difference occurs because referrals for lobbyists or clients who are deceased or no longer in business are included in the total number of referrals but are not displayed in the bar chart.

Figure 13 shows the number and status of LD-203 referrals received and the number of enforcement actions taken by USAO to bring lobbyists into compliance. About 43 percent (2,948 of 6,820) of LD-203 referrals received were closed as in compliance as of December 2024, because all of the listed lobbyists had filed their outstanding reports before or after USAO contacted them. About 57 percent (3,867 of 6,820) of the referrals are pending further 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.<sup>37</sup> USAO officials said that many of the LD-203 referrals are still pending because the individual lobbyists no longer lobby for the firms affiliated with the referrals. The remaining five referrals (less than 1 percent) were suspended because the lobbyist or client was no longer in business, or the individual lobbyist was deceased.

## Status of Civil and Criminal Enforcement Actions

USAO officials reported that, in 2024, the Department of Justice took one civil enforcement action against a lobbyist. Specifically, the department reached a civil settlement with a lobbyist that included a \$65,000 penalty and an agreement that the lobbyist permanently retire from lobbying at the federal level. USAO officials stated that they had identified this lobbyist as a chronic offender. USAO officials did not report taking any criminal enforcement actions in 2024. Civil and criminal enforcement actions for LDA violations can include complaints, lawsuits, settlements, civil penalties, and prosecutions.

## Justice Against Corruption on K Street Act of 2018 Enforcement

USAO officials stated that, as of December 2024, the Department of Justice has not brought any prosecutions related to nondisclosure of relevant crimes under the Justice Against Corruption on K Street Act of 2018 (JACK Act) since the law’s requirements went into effect. USAO confirmed its enforcement role regarding the JACK Act is the same as any other prosecution. If the individual or organization has filed a lobbying disclosure report

<sup>37</sup>As of December 2024, 45 percent (3,745 of 8,314) of the lobbyists listed on LD-203 referrals were compliant. The remaining 55 percent of the lobbyists were not yet compliant.

with misrepresentations, USAO officials said they can initiate criminal prosecution or impose civil penalties under the LDA.

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## Agency Comments

We provided a draft of this report to the Department of Justice for review and comment. The Department of Justice provided technical comments, which we incorporated as appropriate.

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

If you or your staff have any questions about this report, please contact me at [jonesy@gao.gov](mailto: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.

**//SIGNED//**

Yvonne D. Jones  
Director, Strategic issues

*List of Committees*

The Honorable Rand Paul, M.D.  
Chairman  
The Honorable Gary C. Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Charles E. Grassley  
Chairman  
The Honorable Richard J. Durbin  
Ranking Member  
Committee on the Judiciary  
United States Senate

The Honorable Mitch McConnell  
Chairman  
The Honorable Alex Padilla  
Ranking Member  
Committee on Rules and Administration  
United States Senate

The Honorable Bryan Steil  
Chairman  
The Honorable Joe Morelle  
Ranking Member  
Committee on House Administration  
House of Representatives

The Honorable Jim Jordan  
Chairman  
The Honorable Jamie Raskin  
Ranking Member  
Committee on the Judiciary  
House of Representatives

The Honorable James Comer  
Chairman  
The Honorable Gerald E. Connolly  
Ranking Member  
Committee on Oversight and Government Reform  
House of Representatives

# Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports

Table 3 includes the lobbyists and clients listed on the 116 randomly selected LD-2 reports in our sample. We removed some LD-2 reports from the original sample; see appendix III for details on our methodology.

**Table 3: Names of Lobbyists and Clients Listed on Random Sampling of Quarterly Lobbying Disclosure (LD-2) Reports Filed for the Third and Fourth Quarters of 2023 and First and Second Quarters of 2024**

Lobbyists	Clients
A10 ASSOCIATES, LLC	FLAMINGO AIR, INC.
ACG ADVOCACY	ATI, INC.
AKIN GUMP STRAUSS HAUER & FELD	ATLANTIC AVIATION HOLDINGS CORPORATION
ALPINE GROUP PARTNERS, LLC.	BABEL STREET
ALSTON & BIRD LLP	ALLSUP, INC.
ALSTON & BIRD LLP	MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA
ALSTON & BIRD LLP	FAIRVIEW HEALTH SERVICES
AMERICAN COMPOSITES MANUFACTURERS ASSOCIATION	AMERICAN COMPOSITES MANUFACTURERS ASSOCIATION
ARTEMIS POLICY GROUP LLC	THE HEMOPHILIA ALLIANCE
AVOQ, LLC (FRA TEAM SUBJECT MATTER, LLC)	PFIZER, INC.
BARKER LEAVITT, PLLC (SKA MR. JAMES C. BARKER)	WASATCH FRONT REGIONAL COUNCIL
BOSE PUBLIC AFFAIRS GROUP	GEORGE E. WARREN CORPORATION
BROWNSTEIN HYATT FARBER SCHRECK, LLP	MODERNATX, INC.
BROWNSTEIN HYATT FARBER SCHRECK, LLP	AMERICAN HOTEL & LODGING ASSOCIATION
CAE USA INC.	CAE USA INC.
CAPITOL COUNSEL LLC	LAS VEGAS SANDS CORPORATION
CAPITOL HILL CONSULTING GROUP	DAVITA INC

**Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports**

<b>Lobbyists</b>	<b>Clients</b>
CAPITOL SOUTH, LLC	ENVIRONMENTAL WORKING GROUP
CAPITOL VENTURE LLC	AMERICAN OPTOMETRIC ASSOCIATION
CAPROCK STRATEGIES, LLC	MCLANE GROUP INTERNATIONAL, LP
CORNERSTONE GOVERNMENT AFFAIRS, INC.	AMERICAN FEDERATION FOR AGING RESEARCH
CORNERSTONE GOVERNMENT AFFAIRS, INC.	UNIVERSITY OF CHICAGO
COZEN O'CONNOR PUBLIC STRATEGIES	ASSOCIATION OF REGIONAL WATER ORGANIZATIONS
CRESTVIEW STRATEGY US LLC	CAPITAL POWER CORPORATION
CROSSROADS STRATEGIES, LLC	VIFOR INTERNATIONAL AG (CSL VIFOR)
CROSSROADS STRATEGIES, LLC	SECURITIES INDUSTRY AND FINANCIAL MARKETS ASSOCIATION (SIFMA)
CROWELL & MORING LLP	FLEXTRONICS INTERNATIONAL USA, INC.
DCI GROUP, L.L.C.	EN+ GROUP, IPJSC
DESIMONE CONSULTING, LLC	WASHINGTON STATE UNIVERSITY
DICKINSON WRIGHT PLLC	AFFIRM, INC.
DORSEY & WHITNEY LLP	VAREX IMAGING CORPORATION
EFRUS FEDERAL ADVISORS LLC	AUTERION GOVERNMENT SOLUTIONS
ELEVATE GOVERNMENT AFFAIRS, LLC	GENERAL ELECTRIC COMPANY
ELEVATE GOVERNMENT AFFAIRS, LLC	ENERGY FAIR TRADE COALITION
FAEGRE DRINKER BIDDLE & REATH LLP	NATIONAL ACADEMY OF ELDER LAW ATTORNEYS
FARRAGUT PARTNERS LLP	T-MOBILE ASSOCIATION

**Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports**

<b>Lobbyists</b>	<b>Clients</b>
FEDERAL HALL POLICY ADVISORS, LLC	ALLSTATE INSURANCE COMPANY
FEDERAL HALL POLICY ADVISORS, LLC	VANTAGESCORE SOLUTIONS, LLC
FRANKLIN SQUARE GROUP, LLC	ROBLOX CORPORATION
FS VECTOR LLC	BANK POLICY INSTITUTE
GOVBIZ ADVANTAGE, INC.	APTERA MOTORS CORP
HOLLAND & KNIGHT LLP	RED LAKE BAND OF CHIPPEWA INDIANS
HOLLAND & KNIGHT LLP	UL LLC D/B/A UL SOLUTIONS
HYUNDAI MOTOR COMPANY	HYUNDAI MOTOR COMPANY
ICE MILLER STRATEGIES LLC	ITSEASY PASSPORT & VISA SERVICES
INVARIANT LLC	ARM HOLDINGS PLC
INVARIANT LLC	CALIFORNIA DATE COMMISSION
IRRIGATION AND ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA, INC.	IRRIGATION AND ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA, INC
JBS COMMUNICATIONS, LLC	KENTUCKY AND TENNESSEE MARINA ASSOCIATIONS
K&L GATES, LLP	AMERICAN SUPERCONDUCTOR CORPORATION
KASOWITZ BENSON TORRES LLP	IAI NORTH AMERICA
KELLER PARTNERS & COMPANY	UNIVERSAL HEALTH SERVICES, INC.: UHS
LAND TRUST ALLIANCE	LAND TRUST ALLIANCE
LAVENDER CONSULTANTS	ENOVA INTERNATIONAL, INC
LEDGE COUNSEL, INC.	ZERO TO THREE
LEWIS-BURKE ASSOCIATES, LLC	BOSTON UNIVERSITY
LOT SIXTEEN LLC	ADVANCED ENERGY UNITED (FKA ADVANCED ENERGY ECONOMY)

**Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports**

<b>Lobbyists</b>	<b>Clients</b>
LOT SIXTEEN LLC	BPC ACTION (BIPARTISAN POLICY CENTER)
MAERSK AGENCY U.S.A., INC.	MAERSK AGENCY U.S.A., INC.
MARCH OF DIMES	MARCH OF DIMES
MASON STREET CONSULTING, LLC	GLOBAL MEDICAL RESPONSE
MATTOON & ASSOCIATES, LLC	IHEARTMEDIA INC
MCALLISTER & QUINN, LLC	THE MARGOLIN GROUP ON BEHALF OF COUNTY OF SANTA CLARA
MERCHANT MCINTYRE & ASSOCIATES, LLC	COLUMBIA GORGE COMMUNITY COLLEGE
MG HOUSING STRATEGIES LLC	THE WISHCAMPER COMPANIES
MICHAEL POWELSON	ECOLOGICAL RESTORATION BUSINESS ASSOCIATION
MILLER STRATEGIES, LLC	GRAIL LLC
MINDSET ADVOCACY, LLC	INVESTMENT ADVISER ASSOCIATION (IAA)
ML STRATEGIES, LLC	CREARE
MONUMENT ADVOCACY	VALVE CORPORATION
MORAN GLOBAL STRATEGIES, INC.	NATIONAL ASSOCIATION OF FEDERAL EQUITY RECEIVERS (NAFER)
MR. DOYCE BOESCH	CR CAPITAL PARTNERS
NATIONAL ASSOCIATION OF SURETY BOND PRODUCERS	NATIONAL ASSOCIATION OF SURETY BOND PRODUCERS
NATIONAL AUTOMATIC MERCHANDISING ASSOCIATION	NATIONAL AUTOMATIC MERCHANDISING ASSOCIATION
NELSON MULLINS RILEY & SCARBOROUGH	ORANGEBURG COUNTY
NELSON MULLINS RILEY & SCARBOROUGH	HEMOPHILIA OF GEORGIA
NEW FRONT STRATEGIES GROUP, LLC	W.L. GORE & ASSOCIATES, INC.
NVG, LLC	OATLY INC.



**Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports**

<b>Lobbyists</b>	<b>Clients</b>
OCULUS STRATEGIES, LLC	DATALOCKER
PENN STRATEGIES	BUTTON HOLDINGS
POLARIS GOVERNMENT RELATIONS, LLC	PERFORMANCE DRONE WORKS
RICH FEUER ANDERSON	APPRAISAL INSTITUTE
RUBIN HEALTH POLICY CONSULTING, LLC	KINDRED HEALTHCARE D/B/A SCIONHEALTH (FKA KINDRED HEALTHCARE OPERATING, INC)
S-3 GROUP	KOCH GOVERNMENT AFFAIRS, LLC FKA KOCH COMPANIES PUBLIC SECTOR, LLC
S-3 GROUP	STANDARD INDUSTRIES LTD.
SHIONOGI INC.	SHIONOGI INC.
SONORAN POLICY GROUP, LLC D/B/A STRYK GLOBAL DIPLOMACY, FORMERLY KNOWN AS SONORAN POLICY GROUP, LLC	HORIZON THERAPEUTICS (F/K/A) HORIZON PHARMA USA INC
SPLITOAK STRATEGIES LLC	BRISTOL-MYERS SQUIBB
SQUIRE PATTON BOGGS	NLMK PENNSYLVANIA
SUSTAINABLE STRATEGIES DC	CITY OF HUNTINGTON, WV
SWISHER INTERNATIONAL, INC., F/K/A SI GROUP CLIENT SERVICES	SWISHER INTERNATIONAL, INC., F/K/A SI GROUP CLIENT SERVICES
TENCENT HOLDINGS LIMITED	TENCENT HOLDINGS LIMITED
THE FERGUSON GROUP	MOORESVILLE-NC TOWN OF
THE GABOTON GROUP, LLC	BODYSPHERE CORPORATION
THE GALLAGHER GROUP, LLC	SMT CORPORATION, INC.
THE MADISON GROUP	INTUIT, INC. AND AFFILIATES (FORMERLY INTUIT, INC.)
THE MAJORITY GROUP, LLC	NATIONSTAR MORTGAGE

**Appendix I: List of Lobbyists and Clients from the Random Sample of Quarterly Lobbying Disclosure (LD-2) Reports**

<b>Lobbyists</b>	<b>Clients</b>
THE VOGEL GROUP	GOTION, INC.
THORN RUN PARTNERS	BOEHRINGER INGELHEIM PHARMACEUTICALS, INC.
THORN RUN PARTNERS	ASTRANIS SPACE TECHNOLOGIES CORP.
TIBER CREEK GROUP	DEUTSCHE BANK USA (FKA DEUTSCHE BANK SECURITIES INC.)
TORREY ADVISORY GROUP (FORMERLY MICHAEL TORREY ASSOCIATES, LLC)	SOUTHEASTERN LUMBER MANUFACTURERS ASSOCIATION
U.S. APPLE ASSOCIATION	U.S. APPLE ASSOCIATION
UNITED SERVICE ORGANIZATIONS	UNITED SERVICE ORGANIZATIONS
UNIVERSITY OF ALASKA	UNIVERSITY OF ALASKA
VAN BUSKIRK AND ASSOCIATES LLC	OCEANEERING INTERNATIONAL INC
VAN SCOYOC ASSOCIATES	CITY OF THOUSAND OAKS, CA
VAN SCOYOC ASSOCIATES	SAN DIEGO COUNTY
VANTAGE KNIGHT, INC.	VICINITY ENERGY, LLC
VENABLE LLP	THE VISION COUNCIL
VENN STRATEGIES	7-ELEVEN
VENTURE GOVERNMENT STRATEGIES, LLC (FKA HOBART HALLAWAY & QUAYLE VENTURES, LLC)	MICROSOFT CORPORATION
WEST FRONT STRATEGIES LLC	VAPOR TECHNOLOGY ASSOCIATION
WESTMORELAND160, LLC	SRC INC.
WINNING STRATEGIES WASHINGTON	FAIRLEIGH DICKINSON UNIVERSITY
ZIEBART CONSULTING, LLC	ENERGY INFRASTRUCTURE COUNCIL FKA MASTER LIMITED PARTNERSHIP ASSOCIATION

Source: Lobbying disclosure database of the Secretary of the Senate. | GAO-25-107523

## Appendix II: List of Lobbyists from the Random Sample of Contribution (LD-203) Reports

**Table 4: Names of Lobbyists Listed on Random Sampling of Contribution (LD-203) Reports with Contributions Listed, Filed Year-End 2023 or Midyear 2024**

Lobbyists	Reporting Period
AFLAC INCORPORATED	Midyear 2024
AMERICAN ACADEMY OF PHYSICIAN ASSOCIATES	Year-end 2023
AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS	Year-end 2023
AMERICAN ASSOCIATION OF ORAL AND MAXILLOFACIAL SURGEONS	Midyear 2024
AMERICAN TRUCKING ASSOCIATIONS	Midyear 2024
AMERICAN WATER	Year-end 2023
ARCONIC CORPORATION	Midyear 2024
HECTOR ALCALDE	Year-end 2023
JOHN ARIALE	Year-end 2023
JAMES BAILEY	Midyear 2024
RYAN BERNSTEIN	Midyear 2024
KATHLEEN BLACK	Midyear 2024
JORDAN BONFITTO	Year-end 2023
MICHAEL BOPP	Midyear 2024
JOHN BREAUX	Year-end 2023
BURTON STRATEGY GROUP	Year-end 2023
CAE USA INC.	Year-end 2023
CARRIER GLOBAL CORPORATION	Year-end 2023
C.H. ROBINSON WORLDWIDE, INC.	Midyear 2024
MEGHAN CLUNE WOLTMAN	Midyear 2024
COMCAST CORPORATION	Year-end 2023
STEPHEN CONAFAY	Midyear 2024
DAVID CONNOLLY	Year-end 2023
BOBBY CUNNINGHAM	Year-end 2023
DOMINION ENERGY, INC.	Year-end 2023
JORDAN ELSBURY	Midyear 2024
SHAWNA FRANCIS WATLEY	Midyear 2024
JUSTIN GOODMAN	Midyear 2024
REBECCA GOULD	Midyear 2024
GEOFFREY GRAY	Midyear 2024
KELSE GRISWOLD-BERGER	Midyear 2024
TREVOR HANGER	Year-end 2023
ANDREW HARKER	Year-end 2023

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**Appendix II: List of Lobbyists from the Random Sample of Contribution (LD-203) Reports**

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<b>Lobbyists</b>	<b>Reporting Period</b>
TODD HARMER	Midyear 2024
WILLIAM HEYNIGER	Year-end 2023
IHEARTMEDIA, INC.	Year-end 2023
JORDAN LAW FIRM, LLC	Midyear 2024
JAMES KLEIN	Midyear 2024
PATRICIA KNIGHT	Year-end 2023
OLIVIA KURTZ	Midyear 2024
JULIE LASSETER	Midyear 2024
JOHN LONGSTRETH	Year-end 2023
ANASTASIOS MANATOS	Year-end 2023
MARNE MAROTTA	Midyear 2024
BRUCE MARSH	Midyear 2024
JOHN MASON	Year-end 2023
DANIEL MATTOON	Year-end 2023
STEPHEN MCCALL	Year-end 2023
MATTHEW MCGINLEY	Year-end 2023
STERLING MCHALE	Year-end 2023
BOBBY MCMILLIN	Midyear 2024
GUSTAF MILLER	Year-end 2023
PAUL MORINVILLE	Midyear 2024
JEFFERY MORTIER	Midyear 2024
BARBARA ROHDE	Year-end 2023
M&T BANK CORPORATION	Year-end 2023
NATIONAL AIR CARRIER ASSOCIATION	Year-end 2023
NATIONAL ASSOCIATION OF POSTAL SUPERVISORS	Year-end 2023
NATIONAL ASSOCIATION OF WHEAT GROWERS	Midyear 2024
NEW LANTERN, LLC	Year-end 2023
NEXTDECADE CORPORATION	Midyear 2024
DAVID OHRENSTEIN	Midyear 2024
RODNEY PEELE	Year-end 2023
ROCK CENTRAL	Year-end 2023
MARK RODGERS	Midyear 2024
CHRISTOPHER ROE	Midyear 2024
MICHAEL SAYRE	Year-end 2023
DOUG SCHWARTZ	Midyear 2024
DANIEL SHORTS	Midyear 2024
JEFFREY STOLTZFOOS	Midyear 2024
ELIZABETH SULLIVAN	Midyear 2024
JONATHAN TALISMAN	Year-end 2023
THE J.M. SMUCKER COMPANY	Year-end 2023
LEONOR TOMERO	Midyear 2024

Appendix II: List of Lobbyists from the Random Sample of Contribution (LD-203) Reports

Lobbyists	Reporting Period
LAURA VAUGHT	Midyear 2024
PUNEET VERMA	Year-end 2023
MELISSA WADE	Year-end 2023
LISA WHISLER	Midyear 2024
JOEL WHITE	Year-end 2023
DAVID WHITMER	Midyear 2024

Source: Lobbying contribution database of the Secretary of the Senate. Year-end reports for calendar year 2023 and midyear reports for calendar year 2024. | GAO-25-107523

**Table 5: Names of Lobbyists Listed on Random Sampling of Contribution (LD-203) Reports Without Contributions Listed, Filed Year-End 2023 or Midyear 2024**

Lobbyist	Reporting Period
ALLIANCE FOR EXCELLENT EDUCATION	Midyear 2024
ALLIED FOR PROGRESS	Midyear 2024
AMERICAN DEFENSE INTERNATIONAL	Year-end 2023
AUGUSTA UNIVERSITY (FORMERLY GEORGIA REGENTS UNIVERSITY)	Year-end 2023
THEODORE AUSTELL	Midyear 2024
DONALD BARNES	Midyear 2024
GIDGET BENITEZ	Year-end 2023
PEGGY BINZEL	Midyear 2024
THOMAS BISHOP	Year-end 2023
ZACH BODHANE	Midyear 2024
STEPHEN BONNER	Year-end 2023
COLIN BRAINARD	Year-end 2023
CAPITOL 6 ADVISORS	Year-end 2023
CAPITOL CHAMBERS STRATEGIES	Midyear 2024
CENTER FOR CLIMATE AND ENERGY SOLUTIONS	Midyear 2024
JOHN CHAMBERS	Year-end 2023
CLOUDFACTORS LLC	Year-end 2023
TARA CORVO	Midyear 2024
JACOB COURVILLE	Year-end 2023
ROBERT CURIS	Year-end 2023
JODIE CURTIS	Year-end 2023
HOPE DAMPHOUSSE	Midyear 2024
KIMBERLY DEAN	Midyear 2024
DEANNA DEVENEY	Midyear 2024
LUKE DOUGLAS	Year-end 2023
DRUG POLICY ALLIANCE	Year-end 2023
NIA DUGGINS	Midyear 2024
DAVID DUNLAP	Midyear 2024
BRIAN EAGLE	Midyear 2024

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**Appendix II: List of Lobbyists from the Random Sample of Contribution (LD-203) Reports**

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<b>Lobbyist</b>	<b>Reporting Period</b>
ANNA FEDEWA	Midyear 2024
BART FISHER	Year-end 2023
DANIEL FISHER	Midyear 2024
SARA FLETCHER	Year-end 2023
FREE PRESS ACTION FUND	Midyear 2024
TODD GILLENWATER	Year-end 2023
EDWIN GILROY	Year-end 2023
JOHN GLASS	Midyear 2024
JESSICA GREENE	Year-end 2023
DAVID GRIMALDI	Midyear 2024
HNI CORPORATION	Year-end 2023
JASON HOIS	Year-end 2023
INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	Midyear 2024
HANNAH IZON	Midyear 2024
JAMES P. KEESE	Year-end 2023
JOHN J. FASO CONSULTING LLC	Year-end 2023
KATE KALUTKIEWICZ	Midyear 2024
MARTIN KANNER	Year-end 2023
KATHERINE OH	Midyear 2024
YOGIN KOTHARI	Midyear 2024
HAROLD LAWRENCE	Midyear 2024
LIBERTY PARTNERS GROUP, LLC	Year-end 2023
MICHAEL LIEBERMAN	Year-end 2023
ROBERT LIKINS	Midyear 2024
GARRETT LUKKEN	Midyear 2024
RACHEL MAGNUSON	Year-end 2023
HELEN MENEFEE-LIBEY	Year-end 2023
ALYSSA MORRISSEY	Midyear 2024
RAYMOND MORRISSEY	Midyear 2024
ALAN PASETSKY	Midyear 2024
SHARI RENDALL	Year-end 2023
NATIONAL COUNCIL FOR COMMUNITY AND EDUCATION PARTNERSHIPS	Midyear 2024
PHIL OLIVA	Midyear 2024
EBEN PECK	Year-end 2023
PEGGY RAMIN	Midyear 2024
SCOTT SALMON	Midyear 2024
SANDHILLS STRATEGIC SOLUTIONS	Midyear 2024
JOHN SHEA	Year-end 2023
DANELLE SMITH	Midyear 2024
SOUTHERN CALIFORNIA PUBLIC RADIO	Year-end 2023

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**Appendix II: List of Lobbyists from the Random Sample of Contribution (LD-203) Reports**

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<b>Lobbyist</b>	<b>Reporting Period</b>
GRANT SPELLMEYER	Year-end 2023
PETER STEHOUWER	Year-end 2023
AUGUSTINE TANTILLO	Year-end 2023
RICARDO TERRAZAS	Midyear 2024
THE ESTOPINAN GROUP, LLC	Year-end 2023
MADLINE VEY	Year-end 2023
MARK VIETH	Year-end 2023
WASHINGTON ADVOCACY GROUP	Midyear 2024
DAVID WILLIAMSON	Midyear 2024
STEVEN WILSON	Year-end 2023
CHARLES YESSAIAN	Year-end 2023

Source: Lobbying contribution database of the Secretary of the Senate. Year-end reports for calendar year 2023 and midyear reports for calendar year 2024. | GAO-25-107523

## Appendix III: Objectives, Scope, and Methodology

Our objectives were to (1) determine the extent to which lobbyists demonstrated compliance with Lobbying Disclosure Act (LDA) disclosure requirements for reports filed in 2023-2024, and describe how that compliance compares with prior years; (2) identify the challenges or improvements lobbyists report in complying with LDA disclosure requirements; and (3) describe the resources and authorities available to the U.S. Attorney’s Office for the District of Columbia (USAO) to enforce the LDA and efforts USAO has made to improve enforcement.<sup>1</sup>

We used information in the lobbying disclosure database maintained by the Secretary of the Senate. To assess whether these disclosure data were sufficiently reliable for the purposes of this report, we reviewed relevant documentation, consulted with knowledgeable officials, and completed electronic data testing. Based on our review of this information, we determined that Senate data were sufficiently reliable for the purposes of our reporting objectives.

We used the Senate lobbying disclosure database to draw a sample of quarterly disclosure (LD-2) reports from the third and fourth quarters of 2023 and the first and second quarters of 2024, to draw a sample of year-end 2023 and midyear 2024 contribution reports (LD-203), and to download documents associated with these samples (e.g., amended LD-2 reports). We also used the database to download data on the population of new client registration (LD-1) reports filed for the third and fourth quarters of 2023 and the first and second quarters of 2024, and to download data on the associated population of LD-2 reports filed in the quarter of registration.

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 consulted with officials from these offices, who 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 100 LD-2 reports from the third and fourth quarters of 2023 and the first and second quarters of 2024.<sup>2</sup> We removed reports with no lobbying activity and with income or expenses of less than \$5,000 from our sample.<sup>3</sup> We drew our sample from the population of 67,577 quarterly disclosure reports filed for the third and fourth quarters of 2023 and the first and second quarters of 2024 available in the public Senate 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 to compare generalizable estimates for 2024 with those from each preceding year, dating back to

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<sup>1</sup>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), organizations with in-house lobbyists, and lobbyists’ representatives who met with us during our review, unless noted otherwise.

<sup>2</sup>Our original sample included 116 randomly selected LD-2 reports—25 reports per quarter and four additional reports for each quarter as alternates. We subsequently removed two LD-2s from the sample because the lobbyists associated with them were unable to participate in our review. We also removed three LD-2s because they had no lobbying activity in the sampled quarter. We then selected five LD-2 reports from the pool of alternates and did not use the remaining 11. Appendix I provides a complete list of lobbyists and clients in our original sample of LD-2 reports.

<sup>3</sup>LD-2 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.



2015. We found that results were generally consistent from year to year and few statistically significant changes existed (as noted in our report) after using a Bonferroni adjustment to account for multiple comparisons.<sup>4</sup>

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 we present in our report about LD-2 reports have 95 percent confidence intervals of within plus or minus 12 percentage points or fewer of the estimates themselves. We report the maximum margin of error of 12 percentage points, though individual estimates may have smaller margins of error.

Using a structured web-based survey, we asked all lobbyists in our sample to confirm key elements of the LD-2 reports, including

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

We also used the survey to ask whether the lobbyists maintained and could provide written documentation for these pieces of information. After lobbyists submitted survey responses, we interviewed them or their designees to review their documentation supporting selected elements of their LD-2 reports.

Prior to each interview, we conducted research to determine whether individual lobbyists properly disclosed their covered positions as required by the LDA. We reviewed the individual lobbyists' previous work histories by searching sources such as lobbying firms' websites, LinkedIn, LegiStorm, and Google. Prior to 2008, individual lobbyists were only required to disclose covered 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.

Individual lobbyists are required to disclose previously held covered official positions either on the LD-1 or on an LD-2 report.<sup>5</sup> Consequently, those who held covered official positions may have disclosed the information on the LD-1 or an LD-2 report filed prior to the report we examined as part of our random sample. 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 database to determine whether the lobbyist properly disclosed the covered official position on a prior report or LD-1. Finally, if, based on our searches, an individual lobbyist appeared to have

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<sup>4</sup>A 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.

<sup>5</sup>Specifically, when an individual lobbyist is added after the LD-1 has been submitted, the individual lobbyist should disclose covered positions on the first LD-2 where the individual lobbyist appears.

held a covered position that was not disclosed, we asked for an explanation during the interview to ensure that our research was accurate. Despite these discussions and our research, we cannot be certain that we identified all covered positions lobbyists held.

To determine whether lobbyists in our LD-2 sample worked with affiliated organizations, we reviewed lobbying disclosure reports and interviewed lobbyists.<sup>6</sup> Prior to interviews, we reviewed the LD-2 reports in our sample, as well as the LD-1s associated with them, to identify whether lobbyists listed one or more affiliated organizations. During interviews, we also asked lobbyists whether they worked with affiliated organizations on behalf of the client listed on that LD-2. In discussing lobbyists' work with affiliated organizations, we must rely on information lobbyists self-report because no independent or outside source exists that would allow us to verify the information they provide.

The Justice Against Corruption on K Street Act of 2018 (JACK Act), which amended the Lobbying Disclosure Act of 1995, added disclosure requirements for lobbyists. The JACK Act requires that lobbyists disclose on all LD-1 and LD-2 reports whether individual lobbyists have been convicted of certain criminal acts at the federal or state level. Offenses include bribery, extortion, embezzlement, an illegal kickback, tax evasion, fraud, conflict of interest, making false statements, perjury, or money laundering. Lobbyists who have been convicted of these offenses must provide the date of the conviction and a description of the offense. Lobbyists were required to begin disclosing this information on their quarter one 2019 LD-2 reports.

To determine whether lobbyists in our sample of LD-2 reports complied with the JACK Act, we analyzed information on their criminal background records. First, we used lobbyists' websites, LinkedIn, and Google to positively identify these individual lobbyists. Then, we downloaded criminal background records on each individual lobbyist from the Accurint and CLEAR databases. The information in these databases comes from public and private sources and includes details such as criminal arrests or convictions. We used this information to determine whether each lobbyist had committed a crime that the lobbyist would be required to report under the JACK Act. When the information in CLEAR and Accurint reports was unclear (i.e., we could not determine whether the lobbyist had been convicted of relevant crimes), we followed up with additional criminal background checks.

In addition to examining the content of the LD-2 reports, we determined whether the lobbyists in our sample of LD-2 reports filed certain LD-203 reports. We searched the Senate lobbying disclosure database to find these reports. In all cases, we determined whether both the lobbying firms (or organizations with in-house lobbyists) and the individual lobbyists listed on the LD-2s in our sample filed LD-203 reports. For LD-2s filed for the third and fourth quarters of 2023 in our sample, we determined whether the lobbyists submitted LD-203 reports covering the second half of calendar year 2023 (year-end reports). For LD-2s filed for the first and second quarters of 2024 in our sample, we determined whether the lobbyists submitted LD-203 reports covering the first half of calendar year 2024 (midyear reports).

We conducted this review of LD-203 filings on our random selection of LD-2 reports. As a result, our findings are generalizable to the population of LD-2 reports; we can estimate the percentage of LD-2 reports that listed

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<sup>6</sup>An "affiliated organization" is an organization that both (1) contributes more than \$5,000 to the lobbying effort; and (2) actively participates in the planning, supervision, or control of the lobbying activities. See 2 U.S.C. § 1603(b)(3); the term "affiliated organization" itself is not found in the law but defined in the LDA guidance. Office of the Clerk, U.S. House of Representatives, Secretary of the Senate, U.S. Senate, *Lobbying Disclosure Act Guidance* (Washington, D.C.: Feb. 28, 2025). See <https://lobbyingdisclosure.house.gov/ldguidance.pdf>, accessed March 19, 2025.

lobbying firms, organizations with in-house lobbyists, and individual lobbyists who filed LD-203 reports. However, our sample is not a direct probability sample of lobbying firms, organizations with in-house lobbyists, or individual lobbyists listed on LD-2 reports. As such, we cannot estimate the likelihood that LD-203 reports were appropriately filed for the populations of lobbying firms, organizations with in-house lobbyists, or individual lobbyists listed on LD-2 reports.

We also determined the extent to which the population of lobbyists who registered in the third and fourth quarters of 2023 and the first and second quarters of 2024 met the LDA's requirement to file an LD-2 report in the quarter of registration. To match LD-1s with corresponding LD-2s, we used data filed with the Secretary of the Senate and an electronic matching algorithm that includes strict and loose text matching procedures. We began by matching reports and registrations using the Senate identification number, which is linked to a unique lobbyist-client pair. For registrations not matched to a report by the Senate identification number, we searched for matching filings based on cleaned and standardized versions of the client and registrant name.

For reports we could not directly match by identification number or standardized name, we attempted to match reports and registrations based on near matches between clients' and registrants' names. This process allowed for variations in the names to accommodate minor misspellings or typographical errors. In these cases, we used professional judgment to determine whether cases with typographical errors were sufficiently similar to consider as matches.

To determine the extent to which lobbyists accurately reported information on their LD-203 reports as required by the LDA, we analyzed a stratified random sample of LD-203 reports. The sample contains 80 reports that listed political contributions and 80 reports that did not list political contributions. In each category, half are from the year-end 2023 filing period and half are from the midyear 2024 filing period. We drew our sample from the population of 35,034 LD-203 reports, which included 17,817 year-end 2023 reports (5,003 listed political contributions and 12,814 did not) and 17,217 midyear 2024 reports (5,387 listed political contributions and 11,830 did not).<sup>7</sup>

We compared the contents of the LD-203 reports in our sample to corresponding political contribution data found in the publicly available Federal Election Commission's (FEC) political contributions database. This comparison allowed us to determine whether each LD-203 report contained all relevant political contributions listed in the FEC data, as required by the LDA. In cases where we found contributions in the FEC database that were not included on the associated LD-203 reports, we asked lobbyists to explain why the contributions were missing. We then analyzed the information and documentation lobbyists provided to make a final determination on whether the lobbyists should have listed the contributions on their LD-203 reports.

To assess whether FEC's data were sufficiently reliable for the purposes of this report, we reviewed relevant documentation, consulted with knowledgeable FEC officials, and checked the data for missing values and internal consistency. Based on our review of this information, we determined that FEC data were sufficiently reliable for our purposes.

Our sampling approach allows us to generalize our estimates of LD-203 accuracy to either the population of LD-203 reports with contributions or reports without contributions with a 95 percent confidence interval of within plus or minus 10 percentage points or fewer. Although our sample of LD-203 reports was not designed to

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<sup>7</sup>These population numbers are as of our download date (Sept. 17, 2024).

detect differences over time, we conducted tests of significance for differences between 2024 and prior years. We found no statistically significant differences after adjusting for multiple comparisons.<sup>8</sup>

To identify any challenges or potential improvements to compliance by lobbyists, we used a structured web-based survey. We asked lobbyists to rate their ease of complying with 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 terms associated with LD-2 reporting requirements.<sup>9</sup>

We sent our survey to the lobbyists who filed the 116 LD-2 reports in our sample, but the number of different lobbyists responding to the survey was 99. Two lobbyists did not have lobbying activity and did not complete the survey. One lobbyist was unable to complete the survey due to hardship. Thirteen lobbyists completed more than one survey because they had more than one LD-2 report in our sample; we only included one survey response from each lobbyist.

To describe the resources and authorities available to the U.S. Attorney’s Office for the District of Columbia (USAO) and efforts the office has made improve its LDA enforcement, we analyzed information, data, and documents we obtained from USAO officials. Specifically, we interviewed USAO officials, analyzed data from the internal system they use to track their actions to enforce lobbyists’ compliance with the LDA, and reviewed their semiannual reports to Congress. To assess whether USAO’s data were sufficiently reliable for the purposes of this report, we reviewed relevant documentation and consulted with knowledgeable USAO officials. Based on our review of this information, we determined that USAO data were sufficiently reliable for our purposes.

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

We conducted this performance audit from April 2024 to April 2025 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.

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<sup>8</sup>We used a Bonferroni adjustment to account for the nine pairwise tests for each item examined.

<sup>9</sup>Some lobbyists may not have responded to all survey questions about their ease of complying with LD-2 reporting requirements, or about their understanding of terms associated with these reporting requirements. Therefore, the number of responses to each question may be inconsistent with the number of different lobbyists.

# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Yvonne D. Jones, [jonesy@gao.gov](mailto:jonesy@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Elizabeth Fan (Assistant Director), Colenn Berracasa (Analyst in Charge), James Ashley, Daniel Bibeault, Ann Czapiewski, Lydia Koeller, Krista Loose, Sheila R. McCoy, Dylan Stagner, Evalin Olson, Hannah Ritchey, Jason Rodriguez, Rebecca Sero, Andrew J. Stephens, Peter Verchinski, and Jessica Villatoro made key contributions to this report.

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## Related GAO Products

*2023 Lobbying Disclosure: Observations on Compliance with Requirements.* [GAO-24-106799](#). Washington, D.C.: April 1, 2024.

*2022 Lobbying Disclosure: Observations on Compliance with Requirements.* [GAO-23-105989](#). Washington, D.C.: March 31, 2023.

*2021 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-22-105181](#). Washington, D.C.: April 1, 2022.

*2020 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-21-375](#). Washington, D.C.: April 1, 2021.

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

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

*2017 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-18-388](#). Washington, D.C.: March 30, 2018.

*2016 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-17-385](#). Washington, D.C.: March 31, 2017.

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*2010 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.* [GAO-11-452](#). Washington, D.C.: April 1, 2011.

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*2009 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.*  
[GAO-10-499](#). Washington, D.C.: April 1, 2010.

*2008 Lobbying Disclosure: Observations on Lobbyists' Compliance with Disclosure Requirements.*  
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[GAO-08-1099](#). Washington, D.C.: September 30, 2008.

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