

LOBBYING FIRM  
REGISTRATION FORM  
[Form EC-801]

## INTRODUCTION

Lobbying Firms must register with the City Clerk within ten calendar days of qualifying as a “lobbying firm.” The City’s Lobbying Ordinance defines “lobbying firm” to mean “any entity that receives or becomes entitled to receive any amount of monetary or in-kind compensation to engage in lobbying activities on behalf of any other person, and that has at least one direct communication with a City Official for the purpose of influencing a municipal decision.” In other words, a firm is a “lobbying firm” if it lobbies the City on behalf of another party, even if that party only pays \$1 for the services. A lobbying firm also includes any entity that engages in lobbying activities on behalf of another person pursuant to a contingency fee agreement.

Lobbying Firms register by completing and filing this Registration Form with the City Clerk, and paying the applicable registration fees. On this form, identify your firm’s lobbyists and clients, as well as the campaign fundraising activities, campaign-related services, and City contracts associated with the owners, officers, and lobbyists in your firm.

File one Registration Form to cover the activities of the entire lobbying firm. Note that this is a departure from the City’s previous reporting procedures. Under the new procedures, individual lobbyists do not register. All information relevant to an individual lobbyist should be contained within the firm’s Registration Form.

The Registration Form is available from the City Clerk. Electronic versions are available on the City Clerk’s website: [www.sandiego.gov/city-clerk/elections/lobby/index.shtml](http://www.sandiego.gov/city-clerk/elections/lobby/index.shtml)

You may type or print on the form. If printing, use blue or black ink. If using the electronic version of the form, note that you can type on the form with your computer, but you cannot save the information you enter unless you have the full version of Adobe Acrobat.

When you file the Registration Form, include only the cover sheet and the schedules that contain the firm’s disclosures. Do not file the instruction sheets or any schedules on which the firm has nothing to report.

File the original completed and signed form with the City Clerk.

**Registration Terminates Every January 5. Annual Re-Registration is Required.**

## COMPLETING THE FORM

**Cover Sheet**

- Identify the calendar year in the upper left-hand portion of the form.
- If the report is an amendment, check the applicable box. You are required to file an amendment when information on a previously filed Registration Form has changed, e.g., the firm adds a new client or a new lobbyist. You must amend your Registration Form within ten calendar days of the change in information.
- Identify the name, address, and telephone number of the lobbying firm. For the portion of the cover sheet pertaining to Schedule C (Activities Disclosure), check the applicable boxes to indicate whether or not the firm has information to report. For information regarding how to complete the individual schedules, see the instructions that are located immediately preceding each schedule.
- After you have completed the Registration Form, identify (in the designated location at the top of the cover sheet) the total number of pages you are submitting. Count the cover sheet and all attached schedules. Do not count (and do not file) any of the instruction sheets or any schedules that are blank.
- A duly authorized owner or officer of the lobbying firm must complete the bottom of the cover sheet to verify the accuracy of the information disclosed on the Registration Form.



## Instructions for Schedule A: Lobbyist Disclosure

This schedule must be completed as part of a Lobbying Firm's registration. Use this schedule to identify every owner, officer, and employee in the firm who lobbied the City within the past 30 calendar days, as well as any individual in the firm who is reasonably likely to lobby the City later in the year.

### Completing the form:

- Identify the firm's name at the top of the schedule.
- List the first and last name of every individual in the firm who:
  - ✓ has lobbied a City Official within the past 30 calendar days, or
  - ✓ the firm reasonably anticipates will engage in lobbying the City later in the year.
- Check the box at the bottom of the page if you have additional Lobbyist information to report, and disclose that information on a continuation sheet (i.e., another copy of the "Lobbyist Disclosure" schedule). Be sure to identify the name of the firm on each continuation sheet.
- If you are filing an amendment to a Registration Form filed earlier in the year, identify only the names of the new lobbyists; do not repeat the names of individuals already registered for the year.



**Note:** Including the name of prospective lobbyists on the registration form enables the firm to identify these individuals without having to amend the form each time another person in the firm starts lobbying the City.



## Instructions for Schedule B: Client Disclosure

This schedule must be completed as part of every Lobbying Firm's registration. Use this form to identify every client for whom the firm is lobbying the City. A "client" is defined as "any person who provides compensation to a lobbying firm for the purpose of influencing a municipal decision, and any person on whose behalf lobbying activities are performed by a lobbying firm." Thus, the term "client" includes any the person who pays the firm to lobby, and also includes any person who does not pay the firm but who for whom the firm provides lobbying services. (If a firm has met the registration threshold, i.e., it has received \$1 or more for lobbying, it must disclose all of its clients, including its *pro bono* clients.) A "client" also includes any person who retains a firm to engage in lobbying activities pursuant to a contingency agreement, even if the lobbying efforts are unsuccessful and no fees are received.

### Completing the form:

- Identify the firm's name at the top of the schedule.
- List the client's name, address and telephone number.
- Describe the client in sufficient detail to inform the public of the nature and purpose of the client's business. For example, "building contractor" or "wireless telecommunications vendor."
- Describe either the:
  - ✓ specific municipal decision for which the firm was retained (e.g., Living Wage Ordinance) , or
  - ✓ the general types of municipal decisions for which the firm was retained (e.g., any matter relating to City storm drain pollution).
- Identify the outcome the client is seeking. For example, "passage of the Living Wage Ordinance," or "the adoption of stricter laws and policies designed to reduce storm drain pollution).
- If a client is a coalition or membership organization, state the name, address, and telephone number of each individual member of the coalition who has paid, or agreed to pay, at least \$1,000 to the firm for lobbying activities performed on behalf of the coalition or organization with regard to a specific municipal decision.
  - ✓ For example, Bill is a restaurant owner who organizes Citizens for a Brighter Future, a coalition that supports a City Ordinance designed to reduce crime in the Gaslamp Quarter by increasing the number of streetlights. Bill convinces a dozen other restaurant owners to join the coalition, and he takes up a collection to hire a lobbyist. Most of the owners contribute between \$100 and \$500 to retain the lobbyist. Bill kicks in \$5,000. When the lobbying firm reports its clients, it will disclose that its client is Citizens for a Brighter Future, and will also identify Bill, whose payment for the firm's lobbying services exceeded the \$1,000 reporting threshold.
  - ✓ If a coalition member does not meet the \$1,000 threshold when the Registration Form is filed, but later makes, or agrees to make, a payment that would cause the member to reach that threshold, the firm must file an amendment to the form to disclose the identify of that member.
- Check the box at the bottom of the page if you have additional client information to report, and disclose that information on a continuation sheet (i.e., another copy of the "Client Disclosure" schedule). Be sure to identify the name of the firm on each continuation sheet.



**Note:** If you add a new client after you've filed your Registration Form, you must file an amendment to the form, identifying that new client.



**Note:** When filing an amendment, do not repeat the names of clients already registered for the year unless the information for that client has changed, e.g., a change in the outcome sought; the client re-retained you for an entirely different purpose; the client is a coalition and a member of that coalition has reached the \$1,000 threshold.

# SCHEDULE B: CLIENT DISCLOSURE

Name of Lobbying Firm: \_\_\_\_\_

<b>CLIENT'S NAME:</b> _____		Telephone No.: _____		
Client's Address	(Number & Street)	(City)	(State)	(Zip)
Nature and Purpose of Client's Business: _____				
Specific or General Municipal Decisions (see instructions) _____				
Outcome(s) sought: _____				
If this client is a coalition or membership organization, state the name, address, and telephone number of each member of the coalition who has reached the \$1,000 threshold (see instructions):				
_____				
_____				
_____				

<b>CLIENT'S NAME:</b> _____		Telephone No.: _____		
Client's Address	(Number & Street)	(City)	(State)	(Zip)
Nature and Purpose of Client's Business: _____				
Specific or General Municipal Decisions (see instructions) _____				
Outcome(s) sought: _____				
If this client is a coalition or membership organization, state the name, address, and telephone number of each member of the coalition who has reached the \$1,000 threshold (see instructions):				
_____				
_____				
_____				

If more space is needed, check box and attach continuation sheet(s).

## Instructions for Schedule C: Activities Disclosure

Use this form to identify the fundraising activities, campaign services, and City contracting services provided by any owner, officer, or lobbyist in the firm during the past two years.

### Completing the form:

- Identify the firm's name at the top of the schedule.
- For Part 1, Fundraising Activities, identify each owner, officer, and lobbyist in the firm who engaged in "fundraising activities" for a current elected City Official within the past two years, along with the name of the applicable City Official.
  - ✓ Do not report fundraising activities for a candidate who lost or withdrew from the election.
  - ✓ "Fundraising activity" means soliciting, or directing others to solicit, campaign contributions from one or more contributors, either personally or by hosting or sponsoring a fundraising event, and either:
    - (1) personally delivering \$1,000 or more in contributions to a candidate or a candidate's controlled committee, or
    - (2) identifying oneself to a candidate or a candidate's controlled committee as having any degree of responsibility for \$1,000 or more in contributions received as a result of that solicitation.
  - ✓ When determining whether or not someone has reached the \$1,000 threshold, keep in mind that the amount of contributions attributable to an individual is the total amount raised, even if that individual was one of several persons involved in a fundraising effort. Do not divide the total amount raised by the number of persons involved in the fundraising activities.
  - ✓ Do not report fundraising activities that took place prior to January 1, 2007.
- For Part 2, Campaign Services, identify each owner, officer, and lobbyist in the firm who received compensation to provide campaign-related services, such as serving as a consultant or treasurer, to a current elected City Official within the past two years, along with the name of the applicable City Official.
  - ✓ Do not report volunteer services provided to a campaign.
  - ✓ Do not report services provided to a candidate who lost or withdrew from the election.
  - ✓ Do not report campaign services that were provided prior to January 1, 2007.
- For Part 3, Contract Services, identify each owner, officer, and lobbyist in the firm who received compensation to provide services to a City department, agency, or board within the past two years, along with the name of the applicable City department, agency, or board.
  - ✓ Report City employee, City consultant, and City independent contractor contracts.
  - ✓ Do not report volunteer services, such as serving on a City board, commission, or committee.
  - ✓ Do not report any City contract services that were provided prior to January 1, 2007.
- Check the box at the bottom of the page if you have additional activities to report, and disclose those activities on a continuation sheet (i.e., another copy of the "Activities Disclosure" schedule). Be sure to identify the name of the firm on each continuation sheet.

# SCHEDULE C: ACTIVITIES DISCLOSURE

Name of Lobbying Firm: \_\_\_\_\_

## PART 1 – FUNDRAISING ACTIVITIES

**Identify Fundraising Activities** List each owner, officer, and lobbyist of the firm who engaged in “fundraising activities” for a current elected City Official in the last two years, along with the name of the City Official.

Name of Individual

Name of Current Elected City Official

\_\_\_\_\_ fundraised for: \_\_\_\_\_

\_\_\_\_\_ fundraised for: \_\_\_\_\_

\_\_\_\_\_ fundraised for: \_\_\_\_\_

\_\_\_\_\_ fundraised for: \_\_\_\_\_

## PART 2 – CAMPAIGN SERVICES

**Identify Campaign Services** List each owner, officer, and lobbyist of the firm who provided compensated campaign-related services, including consulting services, to a current elected City Official within the past two years, along with the name of the City Official.

Name of Individual

Name of Current Elected City Official

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

## PART 3 – CONTRACT SERVICES

**Identify Contract Services.** List each owner, officer, and lobbyist of the firm who provided compensated services under a City contract within the past two years.

Name of Individual

Name of City Department, Agency, or Board

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

\_\_\_\_\_ worked for: \_\_\_\_\_

If more space is needed, check box and attach continuation sheet(s).

## **Instructions for Schedule D: Deleting Clients (Amendments Only)**

Use this form to identify former clients of the firm who were previously identified on this year's Registration Form if you are no longer providing lobbying services for that client and you do not anticipate providing such services to that client later in the year.

### **Completing the form:**

- Identify the firm's name at the top of the schedule.
- Identify the name of the former client.
  - ✓ You are not required to remove a client if you may perform services for that client later in the year.
  - ✓ If you list a client on this form, and then perform lobbying services for that client later in the year, you will have to file another amendment to the Registration Form, and pay another registration fee for re-disclosing that client.
- Be sure to check the box on the cover sheet indicating that you are filing an Amendment.
- Check the box at the bottom of the page if you have additional clients to delete, and disclose those deletions on a continuation sheet (i.e., another copy of the "Deleting Clients" schedule). Be sure to identify the name of the firm on each continuation sheet.

# SCHEDULE D: DELETING CLIENTS (Amendment Only)

Name of Lobbying Firm: \_\_\_\_\_

Identify in the spaces below the names of any clients previously registered this calendar year for whom you are no longer providing lobbying services, and for whom you do not anticipate providing such services later in the year (be sure to check the "amendment" box on cover sheet):

<u>Client Names</u>	
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

If more space is needed, check box and attach continuation sheet(s).