

NEWSLETTER

Lessons Learned from GAO LDA Audits

May 2011

On April 1, 2011, the U.S. Government Accountability Office (GAO) issued its fourth Lobbying Disclosure Report, "Observations on Lobbyists' Compliance with Disclosure Requirements." Here are some of the lessons learned from this and previously issued reports:

- Always review your quarterly lobbying report (LD-2) before it is filed with the Clerk of the House of Representatives and Secretary of the Senate.
- Be sure to update your LD-2 report between filing quarters. In the April 2011 report, some lobbyists admitted to reporting the same lobbying issues every quarter without reviewing the report to determine if any of the information previously reported had changed.
- Maintain written documentation to support the LD-2 reports that are filed with the Clerk of the House of Representatives and the Secretary of the Senate for at least six years after filing the LD-2 report.
- Document all contacts made with covered officials, including meetings held and telephone calls made.
- Document all income accrued and all expenses relating to lobbying activity to verify the amount reported on Line 12 or 13.
- Standardize your process for collecting and maintaining lobbying activities and covered official contacts made within a quarterly period.
- Review the FEC's database before filing a Semi-Annual Report of Contributions (LD-203) to ensure that you are accurately reporting all contributions made within a semi-annual period.

Authors



Michael E. Toner Partner 202.719.7545 mtoner@wiley.law D. Mark Renaud Partner 202.719.7405 mrenaud@wiley.law

wiley.law 1

- Include an up-to-date contact name, telephone number and email address on your LD-2 report for any communication from the Clerk of the House of Representatives and the Secretary of the Senate.
- Ensure that departing lobbyist-employees understand their personal obligation to file the next semiannual Form LD-203.

wiley.law 2