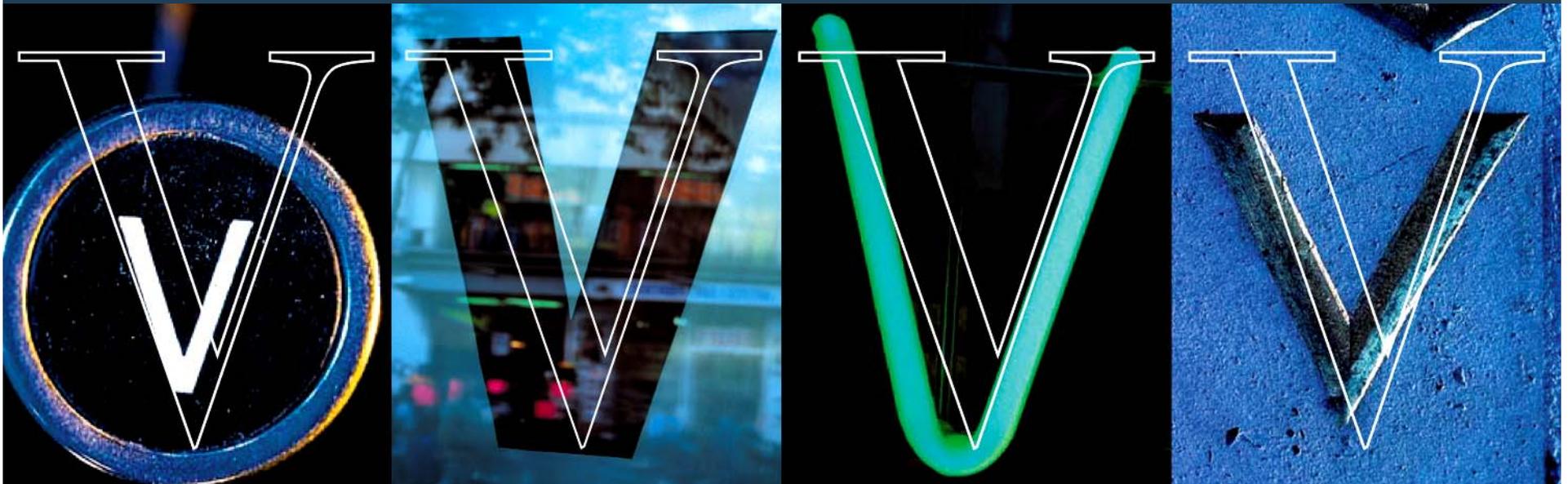


VENABLE[®]_{LLP}

American League of Lobbyists
The LD-203 Report

May 11, 2009



LD-203 Semiannual Report

Agenda for LD-203 Discussion

- Overview of Report
- Information Reported
- Filing the Report
- Suggestions



Overview of LD-203

- Semiannual disclosure of certain “political” contributions
 - FECA
 - Honoring
 - Meetings
 - Presidential libraries and inaugural committees
- Each organization with in-house lobbyist must complete form
- Each individual listed as a lobbyist must complete the form
- Includes certification of Gift Rule compliance
- Due July 30 and January 30



Report Contents

FECA Contributions

- Contributions to federal candidates, leadership PACs, and parties
 - Aggregate to recipient of \$200 or more
 - Aggregate during reporting period
 - **Leadership PAC:** political committee that is directly or indirectly established, financed, maintained or controlled by the candidate or the individual but which is not an authorized committee of the candidate or individual and which is not affiliated with an authorized committee of the candidates or individual



Report Contents

FECA Contributions

- Must report the date and amount of each contribution
- Aggregation is during semiannual period and does not carry over
 - E.g., \$199 in May is not aggregated with \$199 in August
- All of this information is already disclosed through the FEC
 - **Must still be disclosed on LD-203**
- Does not include state contributions or contributions to PACs (other than leadership PACs)



Report Contents

Honoring & Recognizing

- Payments for an event to honor or recognize a covered legislative or covered executive branch official
- Payments to an entity that is named for a covered legislative branch official or an entity in recognition of such official
- Payments to an entity established, financed, maintained or controlled by a covered legislative or covered executive branch official or to entity designated by such official



Report Contents

Honoring & Recognizing

- What is reported?
 - Payee
 - Date
 - Amount
 - Honoree
- Contributions disclosed under the FECA
 - E.g., payment for a fundraising event
- If reimbursed by a registrant, then registrant reports, not lobbyist



Report Contents

Honoring & Recognizing: Not Reported

- **Speaking Events:** Payments for events where covered officials are speakers do not have to be reported unless the speaker receives an award or other special recognition.
- **Appearing on Program:** Listing a covered official as an attendee of an event does not have to be reported unless the speaker receives an award or other special recognition.
- **Co-Hosts:** An event that lists a covered official as an “Honorary Co-Host” is not one honoring or recognizing such officials, or one named for the covered official, unless they are given an award or other special recognition at the event.
- **Titles:** Using the recognized honorific “The Honorable” before a person’s name does not make the event one honoring or recognizing the official.
- **Tickets:** Purchasing a ticket, or even a table, to an event where a covered official will be honored or recognized does not have to be reported, even if the host organization would report its costs for the event.
- **Solicitation:** A solicitation by a covered official for a charitable contribution is not one “designated” by that official unless the official has some other role, such as being on the board of the entity to receive the contribution
- **Honorarium:** Contributions to charity made in lieu of a payment for speaking must be reported



Report Contents

Honoring & Recognizing: Reported

- **Plaques, Awards, Etc.:** If a covered official will be given a “special award, honor, or recognition by the organization” at an event, then it is one honoring or recognizing the official. While not entirely clear from the *Guidance*, this appears to mean more than a simple “thank you for being here today and speaking to us” and more akin to giving that person a specific award or plaque.
- **Payments:** If an individual or organization makes a specific donation to fund an event honoring or recognizing an official, and the donor is aware that the event will be a reportable event at the time of the contribution, then it must be disclosed. This is different than a payment to purchase a ticket or a table at the event.
- **Block Purchases:** If an entity purchases enough tables or tickets to an event that “it would appear that they are paying the costs of the event and/or would not appear to be just ticket or table buyers,” then the payment would have to be disclosed.



Report Contents

Honoring & Recognizing: Examples

- Request for contribution to Iowa relief from Senate staff person
- Looking only at email, is this made at the designation of a covered official?
 - Not merely because of the request BUT because she is on the board of the organization



Report Contents

Honoring & Recognizing: Examples

- Guidance excludes this event because the Covered Officials are only “honorary hosts”

THE STATE SOCIETY OF IOWA
In conjunction with
The Capital Area Iowa Club University of Northern Iowa Alumni Association
Iowa State University Alumni Association Drake University National Alumni Association

Event Sponsors
American Council of Life Insurers
Honeywell
National Beer Wholesalers Association

With Honorary Hosts
Governor Chet Culver
Senator Chuck Grassley
Senator Tom Harkin
Congressman Leonard Boswell
Congressman Tom Latham
Congressman Steve King
Congressman Bruce Braley
Congressman David Loebsack

Invite you to

IOWA
Disaster Relief
2008

**A FUNDRAISER TO BENEFIT
THE VICTIMS OF IOWA'S RECENT FLOODS AND
TORNADOES**

**SUGGESTED MINIMUM
CONTRIBUTION \$20**

Date: Monday June 23, 2008
Time: 6:00-8:00
Location: 101 Constitution Avenue, NW,
Rooftop, Washington, DC
Questions: social@iowasociety.org



*All proceeds will be given to the relief efforts.
The State Society of Iowa is a 501(c)(4) tax-exempt organization.
Tax deductible charitable giving options are available.*



Report Contents

Presidential Entities

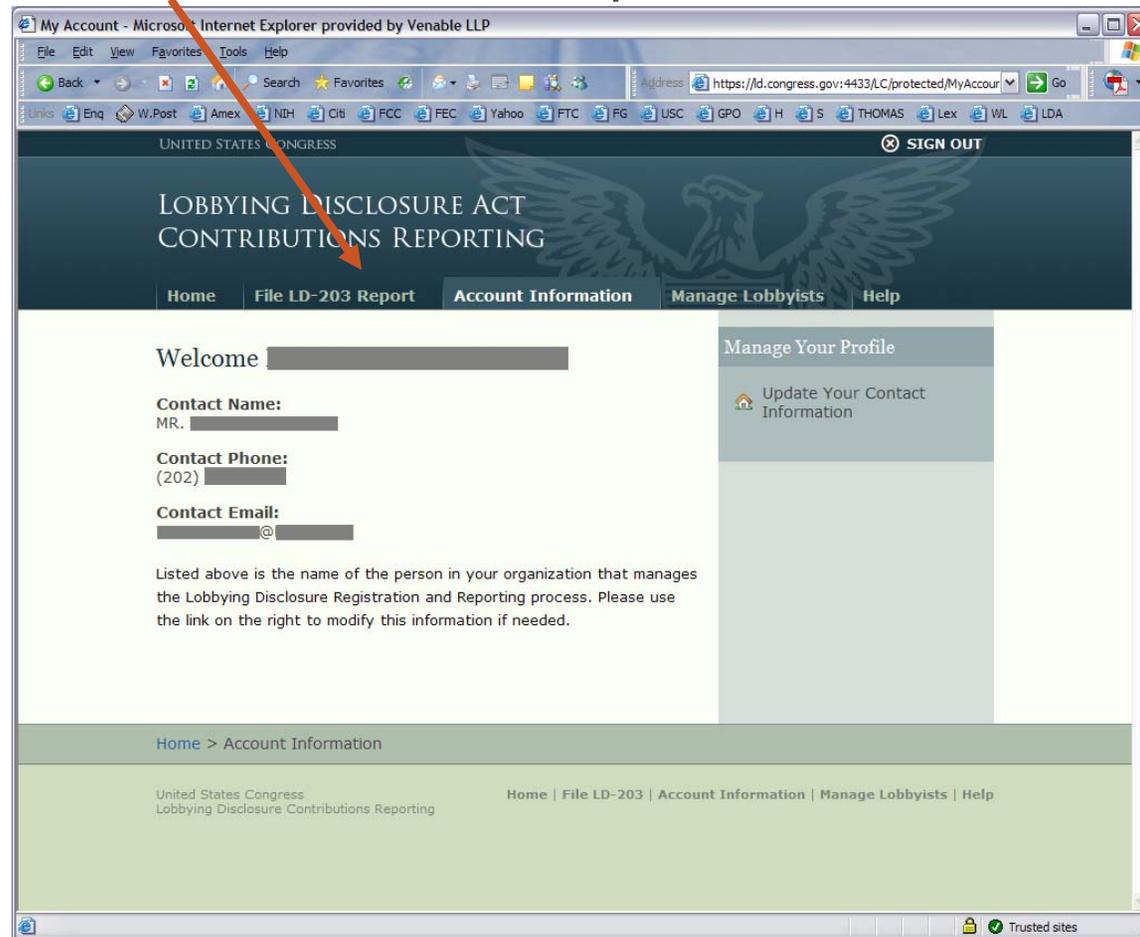
- Name of each Presidential Library Foundation to which contributions aggregating \$200 or more in the semiannual period are given, along with date and amount of contribution
- Name of each Presidential Inaugural Committee to which contributions aggregating \$200 or more in the semiannual period are given, along with the date and amount of the contributions
 - Would include tickets purchased from such committees



Filing the Report

Initial Steps

- Go to <https://ld.congress.gov:4433/LC/>
- Login using ID and password
- Click “File LD-203 Report”



Filing the Report

Initial Steps

- Click create new report



Filing the Report

Initial Steps

- Select reporting period

LD-203 Contribution Report - Microsoft Internet Explorer provided by Venable LLP

File Edit View Favorites Tools Help

UNITED STATES CONGRESS SIGN OUT

LOBBYING DISCLOSURE ACT
CONTRIBUTIONS REPORTING

Home File LD-203 Report Account Information Manage Lobbyists Help

LD-203 Contribution Report

1 Report Period & Name 2 List PACs 3 List Contributions 4 Certification & Signature

Report Period & Name

Report Year: 2008

Mid-Year (Jan. 1-Jun. 30) Year-End (Jul. 1-Dec. 31)

This report amends a previously filed version of this report

Continue

Home > File LD-203 Report

United States Congress
Lobbying Disclosure Contributions Reporting

Home | File LD-203 | Account Information | Manage Lobbyists | Help

Done Trusted sites



Filing the Report

Initial Steps

- Review information & click “Continue to PACs”

LD-203 Contribution Report - Microsoft Internet Explorer provided by Venable LLP

UNITED STATES CONGRESS SIGN OUT

LOBBYING DISCLOSURE ACT
CONTRIBUTIONS REPORTING

Home **File LD-203 Report** Account Information Manage Lobbyists Help

LD-203 Contribution Report – 2008 Mid-Year

1 Report Period & Name 2 List PACs 3 List Contributions 4 Certification & Signature

Report Period & Name

Name:

Contact Name:

Contact Phone:
(202) _____

Contact Email:
_____@_____

When you have confirmed the above information is correct, use the button below to continue to PACs. If this information is incorrect, please use the Update Contact Information page inside the Account Information tab.

➔ Continue to PACs

Home > File LD-203 Report

United States Congress
Lobbying Disclosure Contributions Reporting

Home | File LD-203 | Account Information | Manage Lobbyists | Help

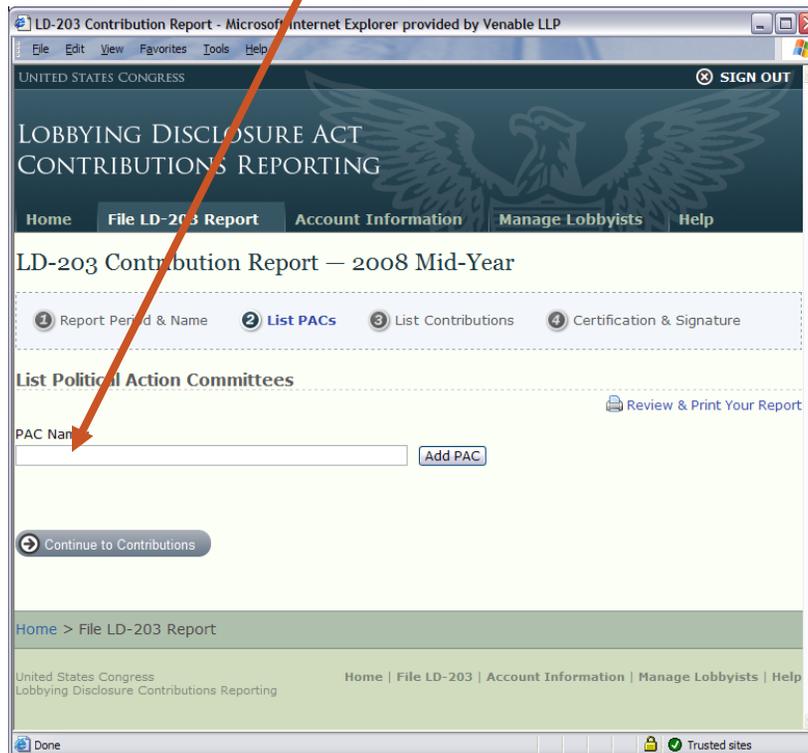
Done Trusted sites



Filing the Report

Controlled PACs

- List PACs that the lobbyist or organization controls
 - Connected PAC must be disclosed by lobbyist but not all contributions
 - Board members “control” a PAC under Guidance
- Click Continue to Contributions



Filing the Report

Contributions

- Type – one of four types (see next page)
- Contributor Name will be self (unless control a PAC)
- Date is date payment made
- Honoree Name is the name of the covered official



Filing the Report

Contributions

- Click Continue to Certification after all contributions are in

LD-203 Contribution Report - Microsoft Internet Explorer provided by Venable LLP

UNITED STATES CONGRESS SIGN OUT

LOBBYING DISCLOSURE ACT
CONTRIBUTIONS REPORTING

Home File LD-203 Report Account Information Manage Lobbyists Help

LD-203 Contribution Report – 2008 Mid-Year

1 Report Period & Name 2 List PACs 3 List Contributions 4 Certification & Signature

No Contributions to Report

List Contributions [Review & Print Your Report](#)

*Contribution Type: FECA

*Contributor Name: Self

*Date:

*Amount:

*Payee Name:

*Honoree Name:

Add Contribution

Continue to Signature

Home > File LD-203 Report

United States Congress
Lobbying Disclosure Contributions Reporting

Home | File LD-203 | Account Information | Manage Lobbyists | Help

Done Trusted sites



Filing the Report

Gift Rule Certification

- Click certification box
- Click Sign and Submit

The screenshot shows a web browser window titled "LD-203 Contribution Report - Microsoft Internet Explorer provided by Venable LLP". The page header includes "UNITED STATES CONGRESS" and a "SIGN OUT" link. The main heading is "LOBBYING DISCLOSURE ACT CONTRIBUTIONS REPORTING". Below this is a navigation menu with "Home", "File LD-203 Report", "Account Information", "Manage Lobbyists", and "Help". The current page is "LD-203 Contribution Report — 2008 Mid-Year". A progress bar shows four steps: 1. Report Period & Name, 2. List PACs, 3. List Contributions, and 4. Certification & Signature (which is highlighted). Below the progress bar is a "Certification & Signature" section with a "Review & Print Your Report" link. A "Comments: (Optional)" text area is present. A checkbox is checked, indicating certification: "I certify that I have read and am familiar with the provisions of the Standing Rules of the Senate and the Rules of the House of Representatives relating to the provision of gifts and travel. I have not provided, requested, or directed a gift, including travel, to a Member of Congress or an officer or employee of either House of Congress with knowledge that receipt of the gift would violate rule XXXV of the Standing Rules of the Senate or rule XXV of the Rules of the House of Representatives during this filing period." Below this is a "Sign and Submit" button with a checkmark icon. The footer includes "Home > File LD-203 Report" and "United States Congress Lobbying Disclosure Contributions Reporting" with navigation links.



Filing the Report

Certification

- “Has read and is familiar with” the House and Senate Gift Rules
- “Has not provided, requested, or directed a gift, including travel, to a Member of Congress or an officer or employee of either House of Congress with knowledge that receipt of the gift would violate” the House or Senate Gift Rules



Filing the Report

Certification

- Lobbyist will show as having signed his or her report
- Organization signature shows the contact name
 - LD-1 and LD-2 allow you to enter the name of the person signing
 - Change contact name in LD-203 to proper signor



Suggestions for LD-203

- Implement Gift Rule compliance program
 - Training
 - Internal controls
- Implement tracking of payments/undertake look-back if not already in place
 - Use accounting codes
 - Require government affairs to sign off on reportable payments
- Establish filing procedures to complete report and have appropriate individual review report



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