

FREQUENTLY ASKED QUESTIONS ABOUT PHILADELPHIA'S LOBBYING LAW

1. What is the purpose of the Philadelphia Lobbying Law?

The City's Lobbying Law ensures disclosure of money spent to influence City government. It does this by requiring principals, lobbyists, and lobbying firms to register with the Board of Ethics and file expense reports when they spend more than \$2,500 on lobbying in a certain time period.

2. What is Lobbying?

Lobbying is an effort to influence any legislative or administrative action by: a) direct communications; b) indirect communications; or c) providing any gift, hospitality, transportation or lodging to a City official or employee for the purpose of advancing the interest of the lobbyist, lobbying firm or principal.

3. What is a principal?

A principal is an individual, association, corporation, business or other person that: a) engages in lobbying on its own behalf; or b) pays someone else to lobby.

4. What is a lobbyist?

A lobbyist is any individual who is paid to lobby on behalf of a principal.

Note: An attorney can be a lobbyist. Unpaid volunteers are not lobbyists.

5. What is a lobbying firm?

A lobbying firm is an entity that is paid to engage in lobbying on behalf of a principal.

Note: A lobbying firm is composed of individual lobbyists who are members, employees or agents of the lobbying firm.

6. When does a principal, lobbyist, or lobbying firm have to register with the Board?

Principals: A principal must register with the Board within ten days of incurring expenses of more than \$2,500 for non-exempt lobbying in a quarter.

Lobbyists: A lobbyist must register with the Board within ten days of engaging in non-exempt lobbying for which the lobbyist has or will be paid more than \$2,500 in a quarter. *However*, if the lobbyist is an employee of the principal (an "in-house" lobbyist) they need not register until they have *also* engaged in 20 or more hours of lobbying activity in that same quarter.

Lobbying Firms: A lobbying firm must register with the Board within ten days of engaging in non-exempt lobbying for which it has or will be paid more than \$2,500 in a quarter.

The law exempts certain expenditures from the \$2,500 thresholds referenced above. A list of these exemptions is located in Regulation 9. See [Board Reg. 9 Subpart D](#).

Quarter #	Covers the time period
1	January 1 through March 31
2	April 1 through June 30
3	July 1 through September 30
4	October 1 through December 31

7. What information must be included in a registration?

Principals: A principal is required to disclose:

- The principal's contact information;
- The date the principal commenced lobbying;
- The name and the Department of State filer identification number of any affiliated political action committees, and acronym, if applicable;
- The nature of the principal's business;
- The name, business address, and PLIS registration number of each paid lobbyist working on behalf of the principal who is required to file a registration statement; and
- For a principal that is an association or organization with members, the approximate number of dues-paying members of the association or organization in the most recently completed calendar year.

Lobbyists: A lobbyist is required to disclose:

- The lobbyist's contact information;
- The date the lobbyist commenced lobbying;
- The name and the Department of State filer identification number of any affiliated political action committees, and acronym, if applicable;
- The name, business address, telephone number and PLIS registration number of each principal for whom the lobbyist is engaged in lobbying;
- The name and PLIS registration number of any lobbying firm with which the lobbyist has a relationship involving economic consideration;
- The name, acronym (if any), and Department of State filer identification number of any candidate political committee of which the lobbyist is the Chair or Treasurer; and
- A statement as to whether the lobbyist is an attorney.

Lobbying Firms: A lobbying firm is required to disclose:

- The lobbying firm's contact information;
- The date the lobbying firm commenced lobbying;
- The name and the Department of State filer identification number of any affiliated political action committees, and acronym, if applicable;
- The nature of the lobbying firm's business;
- The name, business address, and PLIS registration number of each paid lobbyist working on behalf of the lobbying firm who is required to file a registration statement;
- The name, business address, telephone number and PLIS registration number of each principal for whom the lobbying firm is engaged in lobbying.

8. When does a principal, lobbyist, or lobbying firm have to file an expense report with the Board?

Typically, only registered principals are required to file quarterly expense reports. A principal must file an expense report when its non-exempt lobbying expenses exceed \$2,500 in a quarter.

The law exempts certain expenditures from the \$2,500 thresholds referenced above. A list of these exemptions is located in Regulation 9. See [Board Reg. 9 Subpart D](#).

Quarter #	Covers the time period	Expense Report due on or before
1	January 1 through March 31	April 30
2	April 1 through June 30	July 30
3	July 1 through September 30	October 30
4	October 1 through December 31	January 30

If the registered principal's lobbying expenses are \$2,500 or less in a quarter, the principal may, in lieu of an expense report, file a statement stating this fact.

9. What information must be included in an expense report?

An expense report must disclose:

- The name and PLIS registration number of each lobbyist the principal paid more than \$2,500 to in the quarter;
- Information about the principal's quarterly expenses for direct communications;
- Information about the principal's quarterly expenses for indirect communications; and
- Information about all gifts, hospitality, transportation and lodging the principal provided to City officers and employees and their immediate family members during the quarter.

For further guidance about what must be included in expense reports, see [Board Regulation 9 ¶ 9.13](#).

10. How does someone file a registration or an expense report?

All lobbying-related filings must be submitted electronically using the [Philadelphia Lobbying Information System \("PLIS"\)](#). To file, a registrant must create an account in PLIS. The registrant will then create a new registration. Upon completion of the registration process, including payment of the annual registration fee, the registrant will receive a PLIS registration number, which one uses to file expense reports.

11. Are there any exceptions to the reporting requirements?

Yes. The reporting exemptions are listed in [Regulation 9 Subpart D](#). Application of these exemptions is important in determining whether the financial thresholds for registration and expense reports (\$2,500 in a financial quarter) are satisfied.

Some of the more notable exemptions involve lobbying-related activities regarding:

- a. Unpaid volunteers. See [Board Reg. 9 ¶ 9.19\(c\)](#).
- b. Communications with a City officer or employee on a routine, ministerial matter. See [Board Reg. 9 ¶ 9.19\(j\)](#).
- c. Testifying or commenting before City Council or a committee of City Council. See [Board Reg. 9 ¶ 9.19\(a\)](#).
- d. Activities and efforts directly related to responding to publicly advertised invitations to bids and requests for proposals. See [Board Reg. 9 ¶ 9.19\(i\)](#).

NOTE: The applicability of the exemptions listed in Regulation 9 Subpart D is often very fact-specific. If you have questions about the applicability of any of these exemptions you should contact the Board of Ethics.