

Sonnenschein
SONNENSCHN NATH & ROSENTHAL LLP

and

Ward & Lawless LLC Present



Webinar: LD-203
Contributions
Reporting System

Thursday, July 10, 2008

3:00 p.m. - 4:00 p.m. EDT

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Introduction to LD-203

- Key Requirement of HLOGA
 - Focus on Political Contributions and Contributions to “Honor or Recognize” Covered Officials
 - Certification of Compliance with Gift and Ethics Rules
 - Completely **Online** System
- <https://ld.congress.gov:4433/LC/home.aspx>
- First Report Due **July 30, 2008**

LD-203 Contribution Report: Overview

Who must file?

- All active registrants under the LDA
 - Active registrant = not having filed valid termination report for all clients
- All individuals listed as active lobbyists
 - Active lobbyists = listed on any registrant's LD-1 or LD-2, and not terminated by registrant
- Active for **any** part of the semiannual period, regardless of contribution activity (or lack thereof)

LD-203 Contribution Report: Overview

What is in the LD-203 Contribution Report?

- Biographical information (name, address, employer, email, phone)
- All established or controlled PACs
- Political contributions
- Events involving covered officials
- Certification and signature

LD-203 Contribution Report: Certification and Signature

- Registrants and lobbyists must certify that the person or organization filing the LD-203:
 - Has read and is familiar with the House and Senate gift and travel rules; and
 - Has not provided, requested, or directed a gift (including travel) in violation of such rules.
- Filed via password

LD-203 Contribution Report: Certification and Signature

LD-203 Contribution Report — 2008 Mid-Year

Report Period & Name	List PACs	List Contributions
Certification & Signature		

Certification & Signature

[Review & Print Your Report](#)

Comments: (Optional)

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 XXXIV of the Standing Rules of the Senate or rule XXV of the Rules of the House of Representatives during this filing period.

Sign and Submit

LD-203 Contribution Report: What is Disclosed?

The screenshot shows a web browser window titled "LD-203 Contribution Report - Microsoft Internet Explorer". The address bar displays "https://ld.congress.gov:4433/LC/protected/LD3-Contributions.aspx". The page header is "CONTRIBUTIONS REPORTING" with navigation tabs for "Home", "File LD-203 Report", "Account Information", "Manage Lobbyists", and "Help".

The main content area is titled "LD-203 Contribution Report — 2008 Mid-Year". It features a progress bar with four steps: 1. Report Period & Name, 2. List PACs, 3. List Contributions (the current step), and 4. Certification & Signature. Below the progress bar is a checkbox labeled "No Contributions to Report".

The "List Contributions" section contains the following fields:

- *Contribution Type: A dropdown menu with "FECA" selected.
- *Contributor Name: A dropdown menu with "Honorary Expenses", "Meeting Expenses", and "Presidential Library Expenses" listed.
- *Date: An empty text input field.
- *Amount: An empty text input field.
- *Payee Name: An empty text input field.
- *Honoree Name: An empty text input field.

A "Review & Print Your Report" link is located to the right of the fields. The browser's status bar at the bottom shows "Internet".

LD-203 Contribution Report: What is Disclosed?

- Political contributions totaling \$200 or greater:
 - By the filer (lobbyist or organization)
 - By the registrant's PAC (i.e., corporate)
 - By a PAC established or "controlled" by registrant or lobbyist
 - Lobbyist as Treasurer or active board member (approval authority)
- Recipient must be candidate, leadership PAC, or party committee
- Disclosure: date, recipient (candidate & committee), and amount **for each contribution**

LD-203 Contribution Report: What is Disclosed?

- Payments to an entity named for a covered official or in recognition of a covered official
 - Member, staff, or covered executive branch official (LDA definitions)
 - Focus on honoraria, or member-sponsored charities
- Disclosure: date, recipient (entity), honoree/covered official and amount

LD-203 Contribution Report: What is Disclosed?

- “To pay the cost of an event to honor or recognize” a covered official
 - Exceptionally broad scope
 - Sponsoring events where covered officials, **including staff**, are listed;
 - Paying to **attend** events such as conferences, galas, panels, or “speakers’ series”
- Pay the costs of “a meeting, retreat, conference held by, or in the name of, one or more covered officials.”
- Contributions of \$200 or more to a Presidential library foundation or Presidential inaugural committee

LD-203 Compliance Policies

- Potential Strategies for Compliance
 - Establish “point person” for LD-203 expenditures
 - Require pre-approval of all “political” expenses (defined as those subject to LD-203 reporting)
 - Conduct training sessions and ongoing outreach for all employees likely to “touch” covered activity
 - Require full documentation (invitation to event, agenda, etc.) for processing a contribution or expense request

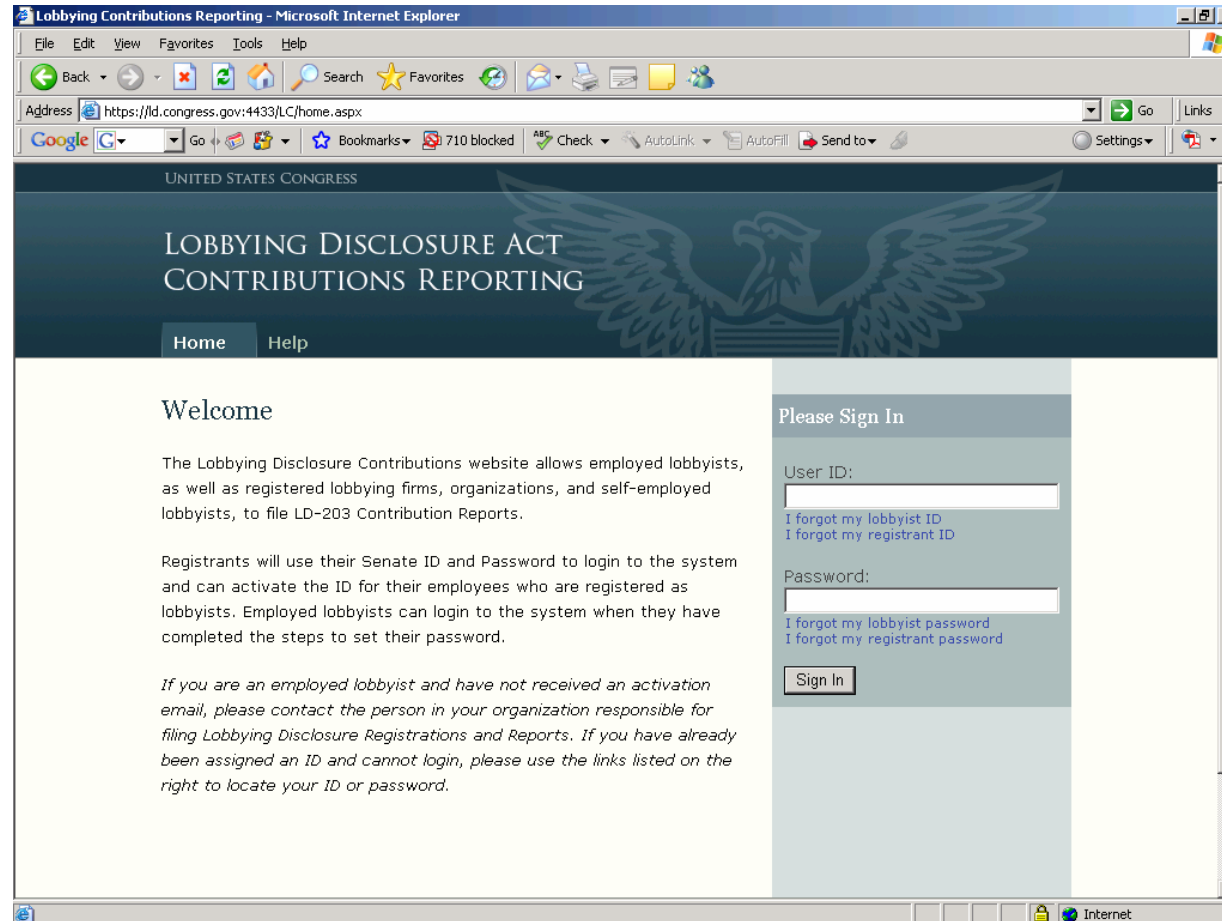
LD-203 Compliance Policies

- Tracking/Identifying Expenditures
 - Involve accounting
 - Include charitable, professional, and political events
 - Survey of departments/employees/executives
- Policies
 - LD-203 requirements
 - House and Senate gift and travel rules
 - Acknowledgement of receipt and awareness of policies
 - Tracking system for disclosable contributions (preferably online to a central person or department)

How to File LD-203 Contribution Report

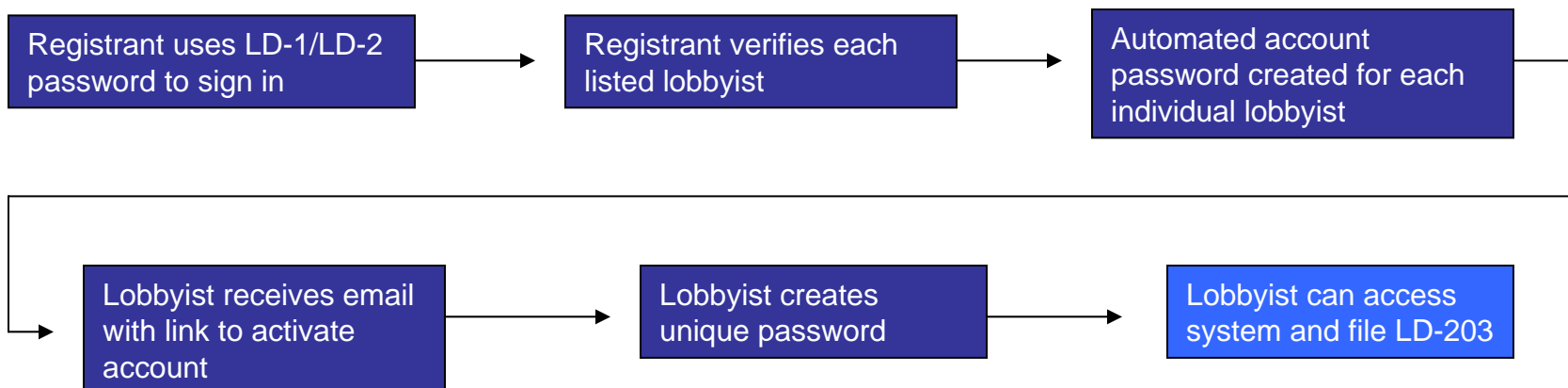
- Online filing required
- Registrant entity must verify each employee lobbyist and review pre-populated contact information
- Individual lobbyists will receive ID via email to access system once verified by registrant employer
- File simultaneously with House and Senate
- Password does not change if filer changes employers

Introduction to LD-203



How to File LD-203 Contribution Report

- Accessing the Online System
 - <https://ld.congress.gov:4433/LC/home.aspx>



Examples and Issues

- What about expenses reimbursed by organization – who reports?
- What if I pay an annual membership for attendance at regular events, like the DLC?
- What about conferences attended by non-lobbyists?

Examples and Issues

- What is the difference between my PAC report and the LD-203?
- Does an active lobbyist for more than one registrant have to file multiple LD-203s?
- What about contributions made before the semiannual period for events occurring during the semiannual period?
- Does a self-employed lobbyist file one or two LD-203s?

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