

Ethics Commission Fact Sheet:

Lobbyist Contributions, Fundraising & Activity Expenses



This fact sheet outlines key reporting requirements for lobbyists in San Francisco, including disclosure of political contributions, fundraising activities, and activity expenses.

Political Contributions

As a lobbyist, you must disclose on your monthly report all political contributions of \$100 or more you made to any City officer or candidate, to their controlled committees, or to City ballot measure committees. For each contribution, you must disclose:

- The contributor's name, occupation, and employer or business;
- The amount of the contribution;
- The date the contribution was made; and
- The committee to which the contribution was made.

Fundraising Activities

You must also report contributions you know (or have reason to know) were raised as a result of fundraising activity by you, your agent, or your employer. Fundraising activities include:

- Asking another person to make a contribution;
- Inviting a person to a fundraising event;
- Supplying names to be used for invitations to a fundraising event;
- Allowing one's name or signature to appear on a solicitation for contributions or an invitation to a fundraising event;
- Allowing one's home or business to be used for a fundraising event;
- Paying for at least 20 percent of the costs of a fundraising event;
- Hiring another person to run a fundraising event;
- Delivering a contribution (other than one's own), by mail, by messenger, or in person; and
- Acting as an agent or intermediary in the making of a contribution.

Multiple Party Contributions: Fundraising events sometimes involve several lobbyists working together to arrange the contributions. If the lobbyists work for the same employer, then only one lobbyist needs to report the contributions. If the lobbyists do not work for the same employer, then the collective contributions should be reported by:

- The lobbyist primarily responsible for soliciting the contribution; or
- Each of the lobbyists reporting separately, in rough proportion to their individual participation in the fundraising activity.

If the lobbyist arranges contributions with non-lobbyists, then the lobbyist should report all the contributions.

Example 1: A lobbyist's employer's name is listed as a co-host on the invitation to a campaign fundraiser for a candidate for the Board of Supervisors, which is paid for by the candidate's committee. Contribution checks totaling \$5,000 are collected by the campaign at the event from ten attendees. The lobbyist must disclose those ten contributions.

Example 2: A lobbyist solicits a contribution from one person to a candidate for the Board of Supervisors. The solicited person specifically indicates that he will mail a contribution check for \$500 to the candidate the next day. After confirming the next day that the contribution has been made, the lobbyist must disclose that contribution.

Activity Expenses

Activity expenses are expenses you incur or payments you make within three months of a contact with an officer, a candidate, or a Supervisor's aide (or their immediate family member or registered domestic partner), and which benefit the person contacted. Gifts are common activity expenses.

You must report all your activity expenses, including those made or arranged by your client or employer at your behest.

Importantly, gifts to public officials are regulated by both state and local law. Before making a gift, you may wish to contact the Ethics Commission or an attorney for guidance.

Last Updated 12/8/14