

How Senate Legislation Would Regulate the Grassroots: **A Summary**¹

**S. 2349, Title II – Lobbying Transparency and Accountability Act of 2006,
amending The Disclosure of Lobbying Activities Act of 1995,
codified at 2 USC 1601 *et seq.***

I. Introduction – Senate Bill Would Regulate More Than Just Grassroots Communications

S. 2349, the Legislative Transparency and Accountability Act of 2006, was passed by the U.S. Senate on March 29, 2006. Title II of that bill, called the Lobbying Transparency and Accountability Act (the “LTA”), incorporates provisions of what was S. 2128 regulating grassroots “lobbying.” The LTA amends the Disclosure of Lobbying Activities Act of 1995 (DLA), codified at 2 USC 1601 *et seq.*

The DLA regulates the lobbying contacts and activities between traditional lobbyists and government officials. The DLA places regulation merely on contacts with government officials and the background work supporting those contacts, but expressly excludes attempts to regulate the First Amendment rights of association and petitioning the government.

The LTA, however, is a radical and unconstitutional departure from the DLA. Instead of regulating contacts with just Congress and government officials, the LTA regulates communications to and with *citizens*.

Despite warnings from constitutional experts and the grassroots community that regulation of the grassroots would abridge the First Amendment rights of speech, the press, petitioning the government and association, this legislation (the LTA) would treat grassroots communications to the public, for all intents and purposes, the same as face-to-face lobbying between K Street and government officials. Making matters worse, S. 2349 would make the regulation of grassroots lobbying even more stringent than existing regulation of face-to-face lobbying in an atmosphere in which Congress is trying to find scapegoats for its own ethical, moral and legal failings.

The LTA would require registration and quarterly reporting of “paid” efforts to contact as few as 500 citizens. The legislation would increase the size of fines from the current limit of \$50,000 to up as much as \$100,000 for certain failures to comply. In essence, this would create penalties for failure to get congressional “permission” to engage in First Amendment rights.

Not only would this legislation impose unconstitutional restraints on First Amendment rights, but costs of tracking data, registering and reporting on a quarterly basis will burn

¹ Prepared for The Free Speech Coalition by Mark J. Fitzgibbons. Not intended to be used or relied upon as legal advice.

valuable time and money of grassroots causes, and will even prevent many new and cash-strapped causes from being able to issue their communications. Non-reporting grassroots causes, their employees and consultants would be subject to substantial fines for publishing and disseminating communications that otherwise constitute core political speech and engaging in rights of association.

For example, the registration and reporting requirements would apply to efforts to

- (1) create and place newspaper and other media ads,
- (2) publish and disseminate newsletters, congressional report cards and other direct mail,
- (3) develop interactive Web sites, and
- (4) use virtually any medium, such as books, magazines, television, radio, videos, CDs, podcasts, and telephone banks, to contact citizens

to “influence” citizens to contact government officials on public policy matters as long as the low and unconstitutional thresholds of this legislation are met. See pages 4 – 6 for some startling examples.

Below is a more detailed summary of the actual legislative details, referencing provisions of the LTA.

II. Who Is Affected

Section 220(a) of the LTA (amending the definitions in 2 USC 1602(7)) defines “lobbying activities” to include “paid efforts to stimulate grassroots lobbying.”

New paragraph (18)(A) is added to 2 USC 1602 to define “paid efforts to stimulate grassroots lobbying” as “**any paid attempt** in support of lobbying contacts on behalf of a client **to influence the general public** or segments thereof **to contact one or more covered legislative or executive branch officials** (or Congress as a whole) **to urge such officials (or Congress) to take specific action with respect to a [public policy] matter**, except that such term does not include any communications by an entity directed to its members, employees, officers or shareholders.” (Emphasis added.)

A “paid attempt to influence the general public” **must be targeted at merely 500 or more members of the general public** to meet the threshold, under what would be new 2 USC 1602(18)(B).

Section 220(a) would add new 2 USC 1602(19), which defines a “**grassroots lobbying firm**” as any person or entity (1) retained by one or more clients to engage in paid efforts to stimulate grassroots lobbying, and (2) receives income of, or spends or agrees to spend, an aggregate of \$25,000 or more for such efforts in any quarterly period.

Explanation. This new definition of “lobbying activities” subject to registration and reporting requirements (explained below) is triggered by very low thresholds. There are

several important definitions and rules that would result in a radical departure from regulating traditional lobbying contacts. As explained below, these new rules would regulate publications and speech to the general public. There is also an important distinction between what constitutes a “grassroots lobbying firm” versus in-house grassroots lobbying subject to registration.

A. Lobbying “contacts” versus lobbying “activities.” Current law defines “lobbying contact” as any oral or written (including electronic) communication with a “covered” elected or government official (including their staff) regarding a broad array of public policy matters, such as formulation, modification or adoption of legislation, federal rules and regulations, administration of policy, and nominations subject to confirmation by the Senate. Exempted from “lobbying contacts” are various communications such as (1) testimony, (2) statements by media organizations for gathering and disseminating news, and (3) speeches, articles and publications distributed through radio, television and other mass media. 2 USC 1602(8).

“Lobbying activities” had been defined under the DLA as the research, planning and strategy work done to support the lobbying contact. Paid efforts to stimulate grassroots activities are now part of that definition of lobbying activities, thus communications to the general public are now regulated and subject to reporting.

The exemptions to lobbying “contacts” do not apply to lobbying “activities.” This is a critical definitional distinction. An article in a publication or a radio broadcast to over 500 people may now qualify as part of “lobbying activities” if it cost money to write or publish that article, or to broadcast.

B. Grassroots lobbying “firm” versus “in-house” grassroots activities. The LTA adds a new definition, “grassroots lobbying firm.” Its sweep may be surprising, as examples below describe. A grassroots lobbying “firm” is any person or entity that is “retained,” and receives, spends or agrees to spend \$25,000 or more in any three-month period on efforts to stimulate grassroots lobbying. Receiving, paying or agreeing to pay \$25,000 or more, aggregated over a three-month period to communicate with as few as 500 members of the public, may be met by the placement of just one editorial ad in a national newspaper, or simply the postage for one national direct mailing.

This \$25,000 threshold does not apply to persons or entities whose in-house, paid attempts to influence the public are targeted at 500 or more people. Therefore, an in-house effort need not spend \$25,000 or more to be deemed a grassroots lobbying activity. It must merely engage in any “paid efforts” to stimulate 500 or more citizens. A surprisingly large amount of in-house activity would therefore be subject to the registration and reporting requirements.

Existing law, 2 USC 1602(2), defines “client” as **any person or entity** that employs or retains another person for financial or other compensation to conduct lobbying **activities**. An employee is distinguished from an independent contractor in the existing statute. However, a person or entity whose employees engage in this new definition of “lobbying

activities” on behalf of that person or entity is **both** client and employer of such lobbying employees. Therefore, **persons or entities** that **employ individuals** who engage in grassroots lobbying therefore would be required to register and report.

An employee becomes a lobbyist by having more than one “lobbying contact,” and spending 20 percent or more of his or her time on “lobbying activities,” which now includes communications to the public. Section 220(d) of the LTA excludes grassroots lobbying from the *de minimus* dollar exemptions for employees of face-to-face lobbyists in 2 USC 1603(A)(3)(A), which means that more employees of grassroots efforts will need to be reported as lobbyists than employees of K Street firms.

The communications must be intended to “**influence**” the general public to contact “covered” government or elected officials. Existing law defines “covered executive branch official” to include White House, higher-level administrative agency and military personnel, and other policy-making personnel. “Covered legislative branch officials” include Members of Congress, their staff and committee staff.

Comments. Despite some of the technical jargon of the statute, most of the grassroots communications that are subject to the registration and reporting requirements should be apparent to the reader. A person or entity that has employees who write, publish and disseminate newsletters and fundraising appeals on public policy issues will likely fit the new definition of “paid” efforts to stimulate grassroots lobbying.

Most effective efforts to communicate with citizens nationally about public policy matters, and to influence them to petition the government, will cost more than \$25,000 in any three-month period. Thus, retaining contractors, such as marketing agencies and other consultants, would result in those contractors being deemed “grassroots lobbying firms” if those consultants are paid, spend or agree to spend \$25,000 or more aggregated over three months.

As noted above, the LTA would regulate communications to the general public, thereby infringing on the First Amendment rights of speech, the press and association. Making matters worse, the LTA’s thresholds apply to communications that would “influence” members of the public to contact government officials, thereby infringing on the right to petition the government. The legislation does not even require that the grassroots causes “urge” citizens to petition the government, but to merely “influence” citizens to make such contacts with government and elected officials.

The following examples may show how far-reaching, absurd and unconstitutional this legislation is. Examples A and B show how easy it is to become a grassroots lobbying firm, and Examples C and D show surprising results of what may now constitute in-house lobbying.

Example A (grassroots lobbying firm)

A nationally circulated newspaper contains an editorial written by the newspaper supporting an open-borders immigration law, and urging readers to contact Congress in support of legislation. A grassroots cause that has privately communicated its opposition to such law to congressional committee members and staff (the lobbying “contact”), retains a public relations firm to write and place a full-page editorial ad (costing \$30,000) in that same newspaper in response to the newspaper’s editorial, and opposing the legislation. The paid ad “influences” readers to contact Congress in opposition to the legislation. The paid ad by the grassroots organization would constitute a lobbying “activity.” Thus, the grassroots organization would be the client, and the public relations firm that wrote and placed the ad would be the “grassroots lobbying firm.”

Example B (grassroots lobbying firm)

A busy public figure, who’s also well-known to be associated with the cause of physical fitness, hires a ghostwriter to write a book about her favorite cause. She has previously sent several emails to the White House and Congress urging creation of a new national fitness program for kids (the lobbying contact). The book expressly influences readers to write the White House and demand action on that public policy matter. The ghostwriter is paid \$30,000 over three months. The author donates 1,000 books to teachers’ organizations. The ghostwriter apparently fits the definition of a “grassroots lobbying firm” since the book is disseminated to more than 500 people, and is intended to influence those members of the general public to contact covered government officials about the cause.

The same author and her publisher of the book retain a publicist to publicize the book. The publicist agrees that he will spend \$40,000 in two months to publicize the book. That publicist appears to fit the definition of “grassroots lobbying firm.”

Example C (in-house lobbying)

A nationally syndicated radio talk show host also has a monthly newsletter, and uses paid staff to research and write for him. On air he heavily promotes passage of legislation called the Fair Tax, which is not a lobbying “contact” since it is conducted as part of his broadcasts. However, he orders his staff to contact Members of Congress and committee staff to explain that his listeners really want to see the Fair Tax passed (the lobbying contact). For three months, more than 20 percent of each of his newsletters is dedicated to the Fair Tax, and influence citizens to petition Congress to pass Fair Tax legislation (the lobbying activities). The talk show host has become at least a client, and possibly a lobbyist, of a grassroots lobbying campaign subject to registration and reporting.

Example D (in-house lobbying)

A publisher of a quarterly public policy magazine hosts a dinner at his Georgetown home attended by several friends, including Members of Congress and some high-

level White House staffers. At dinner, he asks pointedly when Congress is going to pass a balanced budget amendment (the lobbying contact). The government officials say that they don't think there are enough Members of Congress who would vote for one, and that it does not seem to be a pressing concern among citizens. The next week he emails his friends to tell them to read his next publication, which will be devoted exclusively to the balanced budget amendment. His publisher's note in the magazine urges readers to contact Congress to pass the legislation (the lobbying activity). The publisher appears to be both client and grassroots lobbyist.

III. Initial Registration

Section 220(b) of the LTA (amending 2 USC 1603(a)) requires registration with the Clerk of the House or Representatives and the Secretary of the Senate within 45 days of being "retained" by a client to engage in "paid efforts to stimulate grassroots lobbying." The registration requirements apply to any person or entity who "participates in a substantial way in the planning, supervision or control of" the grassroots lobbying activities. See LTA section 217(a), amending 2 USC 1603(b)(3)(B).

Explanation. Whoever fits the definition of a grassroots lobbying "firm" or lobbyist must, within 45 days of the earlier of being retained or making their first lobbying contact, file the Lobbying Registration Form LD-1. The current version of Form LD-1 is at Appendix A to this summary. Any given grassroots effort may have multiple "firms" or in-house lobbyists employed for the same grassroots communications effort, increasing the costs of the grassroots effort times the number of persons or entities that fit the definition of grassroots lobbying "firm" or lobbyist.

The current Form LD-1 requires disclosure of (1) the name, contact information and general business description of the lobbyist, (2) the name, contact information and general business description of the client, (3) the general lobbying issue areas, and (4) affiliated organizations contributing more than \$10,000 to the lobbying effort.

Comments. The registration requirement constitutes a "prior restraint" on First Amendment rights because many, if not most, grassroots campaigns take more than 45 days to plan and implement. Since the date triggering registration is the earlier of the date the person or entity is "retained" or makes the first lobbying contact, grassroots communications published and disseminated after 45 days would be in violation of the law, and subject to the civil penalties (described below) unless the client, firm and/or lobbyist are registered.

This will especially impact on grassroots causes that use their communications to not only "stimulate" citizen action, but who use those communications to seek financial support from citizens for these grassroots efforts. Costs of compliance will be incurred regardless of how little financial support is raised from donors. Large, established, wealthy causes, and those funded by wealthy individuals and corporations, will more easily be able to finance not only their grassroots communications, but the costs of registration and reporting as well (see below).

Since the registration and reporting regulations apply to communications to the public, this will especially hurt donor acquisition or “prospecting” grassroots communications, which often lose money anyway. It takes time to build a supporter base that can finance grassroots efforts, so this registration requirement will work to the detriment especially of small, start-up and unpopular causes that rely on small-dollar citizen support.

The new definition of lobbyist subject to registration is expanded, and applies to any persons or entities that “participate in a substantial way in the planning, supervision or control of” grassroots lobbying. The existing definition under the DLA applies only to persons or entities who “in whole or in major part plan, supervise, or control . . . lobbying activities.” The legislation does not define “participate in a substantial way.”

This definition, however, seems to clearly apply to creative professionals and consultants who are retained for grassroots projects, such as advertising, marketing, and political consultants. Registration would seem to apply to lawyers, research analysts and others who help plan and coordinate grassroots communications.

A single grassroots campaign may require more than one person or entity to register as a grassroots lobbying firm. For example, a grassroots cause plans a campaign in which (1) \$25,000 will be spent on a public policy strategist, (2) \$25,000 will be spent on a research specialist, (3) \$25,000 will be spent on a creative copy writer to prepare ads, (4) \$25,000 will be spent on placement of ads in various newspapers, (5) \$25,000 will be spent on direct mail, and (6) \$25,000 will be spent on developing an interactive Web site. If the six functions were done by six different contractors, each of the six people would be required to register as grassroots lobbying firms on behalf of the grassroots client, thereby incurring six separate registration and reporting costs for this coordinated effort.

IV. Quarterly Reporting

Section 211 of the LTA (amending 2 USC 1604), changes all lobbying reporting requirements from semiannual to **quarterly**.

Explanation. Within 45 days of the end of each quarterly reporting period (the 20th day of January, April, July and October of each year), grassroots lobbying efforts must file Lobbying Report LD-2 with the Secretary of the Senate and the Clerk of the House of Representatives. See Appendix B. The reports must list (1) the reporting person or entity, (2) the client, (3) income and expenses, and (4) the lobbying activity (which include the legislative, executive branch and nomination actions intended to be influenced).

Comments. In addition to filing 990s with the IRS, completing annual reporting to state and local governments under charitable solicitation laws, and all other regulation compliance costs, grassroots causes will now need to pay to track and report this extensive quarterly reporting data for each separate public policy issue to which the person or entity weighs in. As noted above, the reporting requirements are triggered by

amounts spent on the grassroots communications, thus donor acquisition programs that lose money will still need to expend the time and money to track information, and prepare and file reports. These tracking and reporting requirements must be segregated, so grassroots lobbying on five different issues require separate tracking and reporting for each of the five issues.

V. Harsher Penalties

Section 216 of the LTA (amending 2 USC 1606) increases the penalties from \$50,000 to as much as **\$100,000** for failures to register and report. Section 218 (amending 2 USC 1605) requires the United States Attorney for the District of Columbia to report to several congressional committees the number of enforcement actions and fines collected.

Explanation. Anyone required to register and report who knowingly fails (1) to remedy a defective filing within 60 days of notice, or (2) to comply with any provision of the Disclosure of Lobbying laws, shall be subject to a civil penalty of up to \$100,000. The fine is imposed based on (1) a “preponderance” of evidence, which means evidence for is greater than evidence against by as little as one percent, and (2) the extent and gravity of the violation.

Comments. The standards for imposing penalties are very easily met. If the accused is a critic of the government or an unpopular cause, expect the government to seek higher fines.

The reporting requirements of the U.S. Attorney under Section 218 do exclude the names of those against whom enforcement actions were taken, but that is meaningless because actions by the U.S. Attorney will likely be publicized through other means. Thus, grassroots causes that are charged even without being fined will have the public relations stigma of having violated the law *even though they were engaging in core political speech that may have caused no harm to person or property.*

VI. Disclosure of Membership Lists – Not Yet, Anyway

Section 217 of the LTA (amending 2 USC 1603(b)) states that nothing in this law shall be construed to require disclosure of information about members or donors of grassroots causes.

Comments. The 1995 Disclosure of Lobbying Activities law, at 2 USC 1607(a), also said that nothing would be construed to interfere with (1) the right to petition the government, (2) the right to express opinions, and (3) the right of association. The current legislation breaks these commitments, so why shouldn’t grassroots causes expect Congress to later legislate to obtain lists of members and donors?

VII. Effective Date

These new requirements would become effective January 1, 2007.

Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510
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LOBBYING REGISTRATION

Lobbying Disclosure Act of 1995 (Section 4)

Check One New Registrant New Client for Existing Registrant Amendment (mm/dd/yyyy)

1. Effective Date of Registration _____

2. House Identification Number _____ Senate Identification Number _____

REGISTRANT Organization Individual

3. Registrant name Organization _____

Address _____ Address2 _____

City _____ State _____ Zip _____ Country USA

4. Principal place of business (if different than line 3)

City _____ State _____ Zip _____ Country _____

5. Telephone number and contact name Prefix Full Name

Telephone _____ Contact Mr. _____ E-mail _____

6. General description of registrant's business or activities _____

CLIENT *A Lobbying firm is required to file a separate registration for each client. Organizations employing in-house lobbyists should check the box labeled "Self" and proceed to line 10.* Self

7. Client name _____

Address _____

City _____ State _____ Zip _____ Country _____

8. Principal place of business (if different than line 7)

City _____ State _____ Zip _____ Country _____

9. General description of client's business or activities _____

LOBBYISTS Go to page 3 to add more lobbyists >

10. Name of each individual who has acted or is expected to act as a lobbyist for the client identified on line 7. If any person listed in this section has served as a "covered executive branch official" or "covered legislative branch official" within two years of first acting as a lobbyist for the client, *state the executive and/or legislative position(s) in which the person served.*

First	Name		Covered Official Position (if applicable)
	Last	Suffix	

Registrant Name _____ Client Name _____

LOBBYING ISSUES Find the code to select below. [Go to page 3 to add more lobbying issues >](#)

11. General lobbying issue areas. Select all applicable codes listed in instructions and on the reverse side of Form LD-1, page 1.

12. Specific lobbying issues (current and anticipated)

AFFILIATED ORGANIZATIONS [Go to page 3 to add more organizations >](#)

13. Is there an entity other than the client that contributes more than \$10,000 to the lobbying activities of the registrant in a semiannual period **and** in whole or in major part plans supervises or controls the registrant's lobbying activities?

No ⇨ Go to line 14. Yes ⇨ Complete the rest of this section for each entity matching the criteria above, then proceed to line 14.

Name	Address	Principal place of Business (city and state or country)
	Address C/S/Z/C	City State Country
	Address C/S/Z/C	City State Country
	Address C/S/Z/C	City State Country

FOREIGN ENTITIES [Go to page 3 to add more foreign entities >](#)

14. Is there any foreign entity that:

- a) holds at least 20% equitable ownership in the client or any organization identified on line 13: **OR**
- b) directly or indirectly, in whole or in major part, plans, supervises, controls, directs, finances or subsidizes activities of the client or any organization identified on line 13; **OR**
- c) is an affiliate of the client or any organization identified on line 13 and has a direct interest in the outcome of the lobbying activity?

No ⇨ Sign and date the registration. Yes ⇨ Complete the rest of this section for each entity matching the criteria above, then sign and date the registration.

Name	Address			Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client
	Street Address	State/Province	Country			
	City			City State Country		%
	City			City State Country		%

Form Complete >

Printed Name and Title _____

Registrant Name _____ Client Name _____

ADDITIONAL LOBBYISTS Return to page 2 to finish the form <

10 Supplemental. List any additional lobbyists for this client not listed on page 1, number 10.

First	Name Last	Suffix	Covered Official Position (if applicable)

ADDITIONAL LOBBYING ISSUES Return to page 2 to finish the form <

11 Supplemental. General lobbying issue areas. Enter any additional codes for issues not listed on page 2, number 11.

Find the code to select below.

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AFFILIATED ORGANIZATIONS Return to page 2 to finish the form <

13 Supplemental. List any other affiliated organization that meets the criteria specified and is not listed on page 2, number 13.

Name	Address	Principal place of Business (city and state or country)
	Address C/S/Z/C	City State Country
	Address C/S/Z/C	City State Country
	Address C/S/Z/C	City State Country

ADDITIONAL FOREIGN ENTITIES Return to page 2 to finish the form <

14 Supplemental. List any other foreign entity that meets the criteria specified and is not listed on page 2, number 14.

Name	Street Address City	Address State/Province... Country	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client
			City State Country		%
			City State Country		%
			City State Country		%

Add an additional supplementary information page >

Printed Name and Title _____

Appendix B

Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510
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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant name			
2. Address		Check if different than previously reported	
3. Principal place of business (if different than line 2)			
City		State/Zip or Country	
4a. Contact Name	b. Telephone number	c. E-mail	5. Senate ID #
7. Client Name	Self		6. House ID #

TYPE OF REPORT 8. Year _____ Midyear (January 1-June 30) OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report ⇨ Termination Date _____ 11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13	
<p align="center">12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000</p> <p>\$10,000 or more ⇨ \$ _____</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000</p> <p>\$10,000 or more ⇨ \$ _____</p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p>Method A. Reporting amounts using LDA definitions only</p> <p>Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p>Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Registrant Name _____ Client Name _____

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. **Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.**

15. General issue area code _____ (one per page)

16. Specific lobbying issues

17. House(s) of Congress and Federal agencies contacted Check if None

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Registrant Name _____ Client Name _____

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different than line 20)

City

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the client

ISSUE UPDATE

24. General lobbying issues that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal place of Business (city and state or country)

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client

28. Name of each previously reported foreign entity that **no longer** owns, **or** controls, **or** is affiliated with the registrant, client or affiliated organization