

PRACTICAL GUIDANCE

What Nonprofits Need to
Know About Lobbying in

NEW YORK

Inside This Guide:

This Practical Guidance resource is designed to help your nonprofit organization determine if lobbying rules in New York might apply to your state or local work. It includes:

- Summary of registration and reporting triggers
- Key takeaways for nonprofit organizations
- FAQs
- Case study for a hypothetical small student voting rights organization
- List of helpful additional resources

What Lobbying Activities Trigger Registration Requirements in New York?

DIRECT OR GRASSROOTS LOBBYING OF:	CAN THIS TRIGGER?	TRIGGER
State Legislators	Yes	An organization that spends more than \$5,000 in a calendar year on prorated staff compensation and other lobbying expenses (not including overhead) to attempt to influence the passage or defeat of State legislation. This trigger amount is cumulative with lobbying of State executive branch officials and local officials.
State Executive Branch Officials	Yes	Same trigger, applied to attempts to influence a gubernatorial executive order, or the adoption or rejection of any rule or regulation with the force of law by a New York State agency. This trigger amount is cumulative with lobbying of legislators and local officials.
Local Legislators or Local Executive Branch Officials	Yes	Same trigger, applied to attempts to influence the passage or defeat of any local law, ordinance, resolution, or to influence a local executive order. This trigger amount is cumulative with lobbying of State legislators and State executive branch officials. New York City and Nassau and Suffolk counties have their own separate ordinances that may also apply.

Procurement, rate-making and Tribal-State compact lobbying: There are additional specific regulations in New York regarding attempting to influence public officials involved in procurement contracts, rate-making, and Tribal-State compacts. We recommend that you seek additional advice if your organization might engage in these kinds of lobbying.

KEY LOBBYING TAKEAWAYS FOR NONPROFIT ADVOCACY ORGANIZATIONS IN NEW YORK:

- **New lobbying regulatory body:** As of July 2022, New York lobbying regulations are enforced by the Commission on Ethics and Lobbying in Government, which replaced the former Joint Commission of Public Ethics (JCOPE). The rules themselves are not expected to change materially, but you should be sure to consult the latest rules and guidance.
- **Lobbying of New York City officials:** New York City has its own lobbying rules that govern lobbying directed at New York City public officials. If a separate \$5,000 New York City registration trigger threshold is met, your New York City lobbying activity must be reported **both** to the New York State authorities **and** to New York City authorities.
- **Short reporting deadlines and detailed itemized expenses:** New York requires that prorated staff time and expenses incurred in lobbying must be reported only 15 days after the applicable reporting period ends, and that all expenses over \$75 must be itemized. Careful and efficient systems for tracking of staff time and lobbying expenses are crucial to meet these obligations.

This resource is current as September 2022. We do our best to periodically update our resources and welcome any comments or questions regarding new developments in the law. Please e-mail us at advocacy@afj.com or at info@democracycapacity.org with any comments.

This resource is meant to convey the basic principles of sections of State law that are most relevant for nonprofit advocacy and does not cover all aspects or all details of the State statutes. Please refer to the full text of the law for more details. This resource also does not cover details of federal lobbying disclosure law, IRS regulations related to lobbying, or any separate county or municipal regulations that may apply to lobbying-related activities. In some states there is an ongoing movement towards the enactment of additional local county and municipal level lobbying regulations, and organizations are urged to check with the appropriate local jurisdiction before undertaking local lobbying activity.

Q: How should we think about using this Practical Guidance resource?

This Practical Guidance – What Nonprofits Need to Know About Lobbying resource is designed to help your nonprofit organization determine if state or local regulations might apply to your existing or proposed advocacy work. The answer is surprisingly often – **YES!** – but there are also often many advocacy activities that do not require state lobbyist registration or reporting.

This Guide will help you identify which of your state or local activities might trigger registration and reporting, and also give you potential alternative program design ideas that would allow your program to be in compliance with the regulations but not require registration and reporting.

If you do need to register and report with the state, this Guide will also give you practical tips about what information needs to be included in your reports, and how to try to minimize your operational burden while remaining in compliance with the rules.

While this Guide does provide some information about the federal IRS rules that apply to nonprofit lobbying, it is designed to cover state and local regulations. Links to resources containing more information about federal IRS rules can be found in the federal lobbying FAQ below.

We also hope that this Guide will prove useful to legal counsel and other advocacy advisors who are working to assist nonprofit advocacy organizations, as well as the funders who generously support this work. Advisors and funders are invited to use the free Bolder Advocacy Technical Assistance Hotline and the written legal resources available in Bolder Advocacy's resource library at <https://bolderadvocacy.org/>

Comparing New York State and New York City registration and reporting requirements:

We have primarily focused on New York State registration and reporting requirements in this Guide because all lobbying work above the registration trigger in New York State, both at the state and local level, will need to be reported to the State. Where practicable, we have also included information under each FAQ to describe how the separate New York City regime may be implicated. Additional New York City level resources are included on the Additional Resources section at the end of this Guide.

Q: What activities count as lobbying in New York State?

Lobbying is defined by New York State as any attempt to influence a specific list of covered governmental actions or decisions, at the State or local level.

Both **direct communications** with targeted **public officials**, and **grassroots communications** designed to encourage the public to themselves call on public officials count as lobbying in New York.

- These covered governmental actions include:
 - The passage, defeat, introduction, or non-introduction of State or local legislation or resolution (including budget legislation), and the approval or disapproval of such legislation by the Governor or a local level mayor/chief executive
 - The adoption, issuance, rescission, or modification of terms of an executive order (by the Governor or a local level mayor/chief executive)
 - The adoption or rejection of any State agency or local rule or regulation having the force of law
 - Procurement decisions, rate-setting and Tribal-State compacts

Note that the State lobbying regulations apply at the local level for any counties, cities, towns, villages, and improvement/special districts with populations over 5,000, and school districts of any size.

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- A **public official** includes:
 - The Governor, Lieutenant Governor, Comptroller, or Attorney General (and their staffs)
 - Members of the State legislature (and their staffs)
 - State officers and employees (which includes officers and employees of State agencies, as well as State public benefit corporations and commissions where at least one member is appointed by the Governor if the corporation or commission has the legal authority to issue regulations or make final decisions in adjudicatory proceeding; court personnel are included only in connection with procurement decisions)
 - Municipal officers and employees (which include local elected officials, members of local level boards, commissions, and agencies)
- A **State agency** means any department, board, bureau, commission, division, office, council, committee, or other division of the State, including any public benefit corporation or public authority with at least one member appointed by the Governor that is empowered by law to issue regulations or to make final decisions in adjudicatory proceedings. Courts are considered State agencies only in connection with an attempt to influence a court's activities in connection with a government procurement.
- **Direct contact** means any written or verbal communication or interaction directed to a public official or their staff, whether in person or electronic. Importantly, social media communications can be considered direct contact when they are “directly sent” to an account owned or controlled by a public official, or when they include a grassroots call to action linking such an account.
- **Grassroots** communications are included within the definition of lobbying when three conditions are met. The communication:
 - References one of the above covered government actions,
 - Takes a clear position on such action, **and**
 - Includes a **call to action**
- A **call to action** is any “solicitation, exhortation, or encouragement” to members of the public to contact a public official, or to themselves encourage others to contact a public official, about a covered government action. The inclusion of an official's contact information may be sufficient, even if the solicitation to use it is only implied. The inclusion of a petition, or of an email or text message to send, may also count, assuming your communication meets the three factors above. Even activities such as organizing a rally could count as grassroots lobbying if your communications to the public at the rally include a specific call to action relating to specific or proposed legislation or rules.

Note that the State lobbying regulations also consider procurement decisions, rate-making decisions, and Tribal-State agreements to be covered government actions – and additional rules may apply to your work in these areas.

Procurement lobbying: New York's procurement lobbying regulations are complicated! Other actions besides trying to win a New York State contract for your organization can potentially trigger these additional procurement rules. For example, asking a government agency to include a requirement in an RFP that offerors must have language or cultural proficiency could be procurement lobbying. Note that there may be some exceptions for advice requested by a state agency about an RFP but these exceptions are limited and even in a situation where your organization has been invited to weigh in on the terms of an RFP you should be sure you have carefully considered the ramifications with respect to the lobbying regulations.

If you think you might be engaging in procurement lobbying, you should consult the additional detailed procurement lobbying regulations in Section 943.8 of the regulations available here: <https://ethics.ny.gov/system/files/documents/2018/05/part-943-comprehensive-lobbying-regulations-5918.pdf>, the Plain Language Guide to Procurement Lobbying at: <https://ethics.ny.gov/system/files/documents/2018/03/plain-language-guide-procurement-lobbying31518.pdf> and consider seeking additional legal advice as these regulations are particularly convoluted. .

Q: Does New York City have its own rules for lobbying?

Yes! Lobbying of New York City officials is reportable to New York State and counts toward the expenditure threshold for State registration and reporting, but such activities and expenses must **also** separately be reported to the New York City Clerk’s Lobbying Bureau if your organization spends more than \$5,000 on prorated staff compensation and other lobbying expenses specifically for lobbying work aimed at New York City public officials. For the New York City registration threshold, none of your lobbying work aimed at federal or New York State level public officials is counted.

Examples of how New York State and New York City registration thresholds overlap with each other are outlined below.

NYS Prorated Lobbying Comp + Expenses	NYC Prorated Lobbying Comp + Expenses	Need to Register In:
\$3,000	\$3,000	NYS only since NYS combined trigger of \$5,000 is met, but NYC trigger of \$5,000 for NYC lobbying only is not met
\$2,000	\$2,000	Neither NYS nor NYC since the NYS + NYC work totals only \$5,000 and is under the NYS trigger. NYC work is also under the \$5,000 NYC trigger
\$0	\$6,000	Both NYS and NYC, since NYS + NYC work is \$6,000 and over the NYS trigger of \$5,000. The work also is over the \$5,000 NYC only trigger

Note that if you have to register and report in New York City you will almost always also have to register and report in New York State, since if you have met the trigger threshold for New York City you will almost always have also met the trigger threshold for the State.

The structure of the New York City lobbying rules are very similar to those of New York State. Where practicable, we outline in this Guide differences in the two sets of rules.

For New York City, the government actions that lobbying applies to include:

- Any determination made by the City Council, or any member of the City Council (or their staffs), with respect to the introduction, passage, defeat, or substance of any local legislation or resolution
- Any determination made by the Mayor (or their staff) to support, oppose, approve, or disapprove and local legislation or regulation, whether or not such legislation or resolution has been introduced to the City Council

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- Any City-level procurement decisions
- Any determination made by an officer or employee of the City, the City Planning Commission, a borough president, a borough board, or a community board with respect to zoning, land use, acquisition, or disposition of property
- The proposal, adoption, amendment, or rejection by any City agency of any rule having the force and effect of law
- The agenda of, or any determination by, any City board or commission
- Any determination regarding the calendaring or the scope of any City Council oversight hearing
- The issuance, repeal, modification, or substance of a Mayoral executive order
- Any determination made by a New York City official to support or oppose federal or New York State legislation, rules, or regulations

Most of the above categories overlap fairly tightly with the New York State government actions that count as lobbying. Where sometimes work counts as lobbying under New York City rules and not those of the State is in land use matters, and in lobbying regarding the calendaring or the scope of any City Council oversight hearing.

Note that filling out the form application for discretionary funding from the City Council is **not** considered lobbying in New York City but taking additional affirmative steps to procure discretionary funding (for example, by following up directly with a Councilmember) **is** considered lobbying.

Q: How does this work together with federal IRS lobbying regulations?

All tax-exempt organizations must follow both federal tax law (regulated by the IRS) **and** any state and local lobbying laws that apply to their work.

The IRS rules regulate how much lobbying a nonprofit organization can do, while state and local regulations are transparency rules designed to help the public understand what funds are being spent to influence decision making and by whom. As a result, federal tax law rules related to lobbying and state lobbying regulations are quite different, and state lobbying regulations also vary greatly state to state.

In general, the IRS requires 501(c)(3) organizations to report on their annual Form 990 legislative lobbying at the federal, state, and local levels, but does not count as lobbying advocacy activities relating to executive branch or administrative officials at any level. There is no additional requirement for organizations or individuals to “register” with the IRS to report lobbying activities.

Nonprofits that are public charities under IRS exemption 501(c)(3), including grantmaking public charities like community foundations, can lobby within the generous limits allowed by federal tax law. The amount of lobbying is determined by either using the insubstantial part test or the 501(h) expenditure test.

See <https://bolderadvocacy.org/resource/public-charities-can-lobby-guidelines-for-501c3-public-charities-2/>

Organizations that are tax-exempt under 501(c)(4) (social welfare organizations), 501(c)(5) (labor organizations), and 501(c)(6) (trade associations) can do unlimited lobbying. See <https://bolderadvocacy.org/resource/being-a-player-a-guide-to-the-irs-lobbying-regulations-for-advocacy-charities/>

Your organization will need to ensure that you are keeping track of your lobbying staff time and your expenses in a way that works for both your IRS reporting, and for any required state or local reporting, since the information required in each regime will be different.

Note that there is also a federal law called the Lobbying Disclosure Act that requires some organizations to register and report their federal level lobbying activities.

Organizations that have only occasional contacts at the federal level (having occasional

meetings with members or staff or sending occasional letters to Congress) will not need to register under the LDA. The thresholds are designed to require only those organizations with substantial lobbying activities and expenses to file. For more information see https://bolderadvocacy.org/wp-content/uploads/2018/06/Understanding_the_Lobbying_Disclosure_Act.pdf

Q: Does supporting or opposing a ballot measure count as lobbying?

Supporting or opposing a New York State ballot measure is not regulated as a lobbying activity under New York law (even though the IRS does count it as a lobbying activity). The only caveat to this rule concerns **legislatively referred constitutional amendments**. Attempting to influence a public official's vote on the **referral** of a State constitutional amendment would be considered lobbying.

Instead, New York State regulates activity to support or oppose a ballot measure under the State's campaign finance laws. Nonprofit organizations considering working on ballot measures in New York (either working to get a measure on the ballot or supporting or opposing an existing measure) should seek advice on how to comply with any applicable State or local campaign finance reporting requirements.

The Lawyer's Alliance for New York publishes a useful fact sheet on the topic: https://lawyersalliance.org/userFiles/uploads/legal_alerts/Ballot_Measures_Legal_Alert.pdf

NEW YORK CITY RULES: The rules in New York City regarding ballot measures are similar. For example, an attempt to influence a Councilmember concerning the formation of a Charter Revision Commission is likely to be considered lobbying. An attempt to influence the public in connection with a charter revision proposal that is already on the ballot would not be reported to New York City as lobbying but might need to be reported to New York City as a campaign finance expenditure.

Q: What triggers lobbyist registration and reporting in New York?

Your organization will need to register with New York State as a lobbyist and make periodic reports if you anticipate spending more than \$5,000 on lobbying activities within a single calendar year for lobbying in New York State aimed at State or local level officials. Lobbying federal officials does not count towards this threshold, even if they are federal officials representing New York districts and you are lobbying them in New York.

As discussed further below, this threshold includes both prorated staff compensation and expenses related to lobbying but does not require everyday overhead expenses of your organization to be prorated and counted toward the registration trigger threshold, or to be reported.

The items outlined below will need to be tracked carefully for determining your trigger calculation, for both your direct and grassroots lobbying efforts.

A registered lobbyist must also report itemized reportable expenses over \$75 in detail (including the name of the payee, the date of expense, and the detailed purpose for which it was made, out of a choice of more than 30 separate categories). You will need to plan in advance for this operational task and put a robust staff timekeeping and expense tracking systems in place to track and categorize these expenses if you are doing lobbying work in New York that you think may go over the trigger threshold.

We note that it is often simpler if you know you will be going over the threshold at some point during the year to go ahead and register at the very beginning of the year. You will in any case need to report all of your expenses that led up to the \$5,000 trigger threshold, and it is usually an easier operational task to gather and report your expenses contemporaneously than it is to report them after the fact.

- **Prorated staff compensation for lobbying activities that can trigger registration:**

- This is a cumulative calculation across all of your staff, but for the specific purpose of calculating the **lobbyist compensation** component, the staff person needs to be directly involved in planning or carrying out your direct lobbying activities. For example, the regulations specifically exclude copy editors, advertisement writers, photographers, video editors, and website managers, as well as clerical and ministerial staff from the **lobbyist compensation** calculation, and instead ask you to tally these costs in the expenses section described below as a non-lobbyist staff expense.
- The lobbyist compensation calculation includes a prorated amount for both salary and lobbying-related bonuses, but not for any benefits. Remember that it is not permitted for lobbyists to receive compensation contingent on the successful outcome of their lobbying work – see the FAQ below on restrictions on lobbyists.
- You can use any reasonable method to track prorated staff time for this purpose, but you will need to keep good records of your calculations, and such records will need to be retained for at least three years (five for New York City lobbying).

- **Expenses related to lobbying activities that can trigger registration:**

The types of expenses that will count towards the lobbying registration trigger if they are made for the purpose of lobbying activities fall into four general buckets: advertising, advocacy, social events, and social media.

- **Advertising:** This expense category can include not only the purchase of digital ads, print media ads, or printing and postage costs (over \$500 for print items), but also the prorated cost of non-lobbyist support staff or consultant time to design the programs, graphics, content, media buy, social media postings, and to carry out any associated market research.
- **Advocacy:** Can include expenses related to prorated staff time to prepare community events where lobbying activities will occur, costs associated with developing your lobbying target email list, expenses related to bill tracking subscriptions and legislative research, and costs related to your phone or text banking efforts, so long as these items are specifically lobbying related. General organizational expenses do not need to be included.
- **Social Events:** This category can include things like booth or meeting space rentals, A/V equipment rentals, buses, or other transportation to Lobby Day type activities, meals, T-Shirts, or lodging for Lobby Day participants, staff time preparing for the events, and printing of related materials (to the extent that they are over the \$500 statutory exclusion).
- **Social Media:** Can include prorated non-lobbyist support staff costs related to handling your organization's social media presence specifically for lobbying activities, and the cost of creating and buying sponsored lobbying posts.

No reporting or prorating of general office overhead expenses: We reiterate that non-staff expenses in the categories above that you would incur even if your organization was doing no lobbying are considered office overhead expenses that do not need to get reported as lobbying expenses – even for a prorated amount. Only those office overhead expenses that are pure lobbying expenses get counted towards the expense threshold. For example, you do not need to include even a prorated amount of your office rent, or your MailChimp e-mail account costs if you also use your office and your e-mail tools for your non-lobbying work. You would also not need to count the cost of buying cell phones and cell phone minutes if you use the phones for both lobbying phone banking and for other types of phone banks during the year.

NEW YORK CITY RULES: New York City's registration threshold counts only those prorated staff compensation costs and lobbying related expenses (not overhead) that are aimed at New York City public officials.

Q: Are there exceptions to what counts as lobbying?

YES! First and foremost, remember that any contact with a public official that falls outside the definition of lobbying in New York State (and/or New York City) does not count toward the relevant \$5,000 trigger for registration and reporting.

It is not lobbying to spend time deciding what kind of advocacy topics your organization is going to pursue. It only becomes countable lobbying preparation once you are advocating for or against specific or proposed legislation or rules.

It is also generally not lobbying to discuss your organization's mission with public officials if you are not making an ask about legislation, rules, or funding.

In addition, certain activities that might otherwise meet the technical definition do not count as lobbying, and the related expenses do not count towards the registration trigger, because they are named as specific exceptions in the regulations.

The exceptions most relevant to nonprofit organizations are outlined below.

- **Legislative or rule analysis:** Paying for advice (for example, legal analysis) concerning proposed legislation or other covered government actions, as long as that advice is not later used as a basis for other lobbying activities. If the analysis is later used to lobby, then the expense of the preliminary analysis would be counted towards your lobbying trigger or be required to be reported if you are already registered.
- **Agency hearings:** Preparing for or participating in a State or local **agency hearing**, if it is public and the participation will be part of the public record. This exception does not include legislative hearings. Legislative hearings (including budget hearings) only have an exception if you are invited as per the below request for information exception.
- **Requests for information:** Responding to a request for information or comments from a government body (e.g., the legislature, a legislative committee, or a state agency) or an officer of such government body. This exception includes testifying at a **legislative hearing** (which includes hearings for budget and any introduced bills) but must be upon invitation not urged by you.
- **Responses to standard RFP procurement situations:** In general, submitting a written proposal or application in response to an RFP isn't lobbying under New York State or New York City rules, but lobbying rules at both levels may apply to additional contacts with government officials regarding the RFP and you should carefully consult the rules and counsel if you are involved in such scenarios.

NEW YORK CITY RULES: New York City has clarified that any testimony given at a hearing where the public has been invited does not count as lobbying. This may be broader than the exceptions made at the State level outlined above.

Q: If we are required to register with the State, how does the process work?

Once your organization exceeds the \$5,000 lobbying registration threshold (or technically once you anticipate that you will), you will need to register your organization as a lobbyist with the Commission on Ethics and Lobbying in Government. The Commission was formed in July 2022 and replaced the former Joint Commission on Public Ethics ("JCOPE").

As discussed above, it is often simpler if you know you will be going over the threshold at some point during the year to go ahead and register at the very beginning of the year. You will in any case need to report all of your expenses that led up to the \$5,000 trigger threshold, and it is usually an easier operational task to gather and report your expenses contemporaneously than it is to report them after the fact.

Registration is generally done online via the Commission's electronic **Lobbying Application** system (also referred to as "the LA" or "LA") and must be completed no later than 10 days after exceeding the \$5,000 trigger. The financial penalties for failing to file a

registration **at all** can be significant, but late fees are not too onerous for a registration that is not significantly overdue.

The Commission provides a useful video tutorial describing some of the more confusing aspects of the registration process here: <https://ethics.ny.gov/lobbying-info-center>

While quite jargony, the Commission's user guide entitled Lobbyist and Public Corporation Statement of Information can also be useful for trying to follow along with the online registration process.

https://ethics.ny.gov/system/files/documents/2020/12/registration-and-registration-amendment-information_final-12_17_20-.pdf

If you get stuck you can call the Commission Filer Hotline at 800-873-8442 – Option 1 for the Lobbying Unit, or e-mail Registrations@ethics.ny.gov

STEPS FOR SUBMITTING YOUR INITIAL REGISTRATION STATEMENT

Outlined below is the process you would use if your organization is using only your own internal staff to lobby.

If you are instead using an outside lobbyist firm most of the registration and reporting obligations will fall instead on your lobbyist firm, and you should coordinate with them or seek additional advice about the semi-annual reporting you will need to do as the client of the lobbying firm.

- **Create or access an individual NY.gov ID account**

The individual responsible for the organization's registration must use a personal NY.gov ID (my.ny.gov) to begin the online registration process if they don't already have an individual profile on the Commission's Lobbying Application system (the LA). The NY.gov ID portal is the same system that is used to access a variety of New York State agencies, including the DMV. You can access an existing personal account or create one as the first step here: <https://public.ethics.ny.gov/enrollment/>

- **Create an individual user profile on the LA**

Your responsible individual must then create an individual user profile on the LA.

- **Create or claim your organizational profile on the LA**

Assuming your organization has not lobbied before, then you will likely need to create a new organizational profile. Some helpful tips on this part of the process are available in the video tutorial here: <https://ethics.ny.gov/lobbying-info-center>

- **Add a responsible person as your CAO and Delegated Administrator**

You will be required to add a Chief Administrative Officer (CAO) to your organizational account. You also have the option to add a Delegated Administrator (this allows someone other than the CAO to submit filings).

- **Add your staff lobbyists to your organizational account as "Individual Lobbyists"**

It is easier to add the information for your employed staff that will be lobbying for your organization if you do this in your organizational profile before you begin filling out your initial registration statement. As we discussed above in the FAQ on the registration trigger threshold, not all of your staff members who do work that is related to lobbying should actually be listed as an Individual Lobbyist.

- You are only required to list as Individual Lobbyists those staff members who will be making direct communications with public officials. You also do not need to list any volunteers or unpaid staff as Individual Lobbyists for your organization.
- Staff members that do only grassroots lobbying activities, or who only support the direct communications work are not required to be listed.
- If your organization does **only** grassroots lobbying, then you would have **no** Individual Lobbyists listed for your organization, but you would still need to register your organization and file periodic reports.
- You may potentially need to list a member of your Board of Directors if any are actively lobbying for your organization, even if they are not paid. You would list them

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as a “Designated Lobbyist.” Of course, be sure to work closely with your Board member before you decide to report them on this form!

- **Start your organizational registration statement in the LA**

Once you have gotten this far you can start your organizational registration statement in the LA. There are various types of information that you will need to fill out using the electronic submission form, many of which will not apply to your organization if you are lobbying with only employed staff persons and not with a lobbying firm.

- Assuming you are only using your own staff to lobby, your organization is the **Principal Lobbyist**, the **Contractual Client**, and also the **Beneficial Client**. You do not need to create a new profile for any of those entries. Instead, use your organizational profile you created or claimed in the earlier registration steps. Use only business contact information since these records will be public.
- **Co-Lobbyists** and **Sub-Lobbyists** should not usually be applicable to you as these categories usually only apply to outside lobbyists working for an organization under a single lobbying contract.
- If your employed staff lobbies for your organization, where the registration process is requesting a “Lobbying Agreement” you should fill out and upload a **“Lobbying Agreement Form – Employed Lobbyists”** showing a rough estimate of the annual prorated compensation for lobbying work for all of your listed Individual Lobbyists aggregated together. To fill this out, you will need to make your best estimate of how much time each of your employed Individual Lobbyists is likely to spend on lobbying during the relevant time period. The Commission is **not** looking for you to upload any of your staff employment offer letters or employment agreements if you have them. https://ethics.ny.gov/system/files/documents/2022/06/celg_lobbying-agreement-form-employed-lobbyists-6_28_22.pdf
- **Lobbying Subjects:** You will need to enter the lobbying subjects you anticipate working on during the registration period.
- **Focus of Lobbying:** This section asks in more detail the identity of the bills or rules you might lobby, and the people you might aim your lobbying at. Obviously at this stage you might not know all of this information, and you should state “unknown” or “not known at this time” if such options are available instead of checking every legislator or every topic.
- **Reportable Business Relationships:** You will also be required to disclose if your organization has any reportable business relationships (“RBRs”) with state officials. These are defined as an agreement (formal or informal) by your organization to pay more than \$1,000 to a state official or to an entity that the state official has a significant ownership stake in. A RBR can also exist if one of your organization's board members, top managers, or employed lobbyists makes the payment to a state official. See the FAQ below on special reporting for additional details on how to decide if you have any RBR's to report.

There is a \$200 filing fee associated with registration. New York State registration and reporting is tied to a **biennial** (two year) cycle that begins in January of each odd-numbered year. If your organization registers for the first time in the second half of a biennial period, the filing fee is prorated to \$100.

Note that each member of your staff listed as an Individual Lobbyist under your organization will need to complete a mandatory Ethics for Lobbyists training session within 60 days of registration. You can see what the training currently looks like here: <https://ethics.ny.gov/ethics-lobbyists-training>

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- New York City lobbyist registration is renewed annually (as opposed to the New York State biennial cycle).

- The procedures for registration and reporting for New York City are similar to the State rules, but organizations that expect to exceed the City-specific threshold should carefully consult the Lobbying Bureau’s guidance. Contact information and helpful guidance concerning New York City registration and reporting, including the text of the applicable Administrative Code section and Rules, are available at: <https://www.cityclerk.nyc.gov/content/lobbying-bureau>
- New York City also has a mandatory lobbyist training.

Q: When are periodic lobbying reports due?

Once your organization has registered, you will need to file **Bi-Monthly Reports**. As the name suggests, each Bi-Monthly Report covers a period of two calendar months and is due 15 days after the end of the period.

Reporting Period	Due Date
January – February	March 15
March – April	May 15
May – June	July 15
July – August	September 15
September – October	November 15
November – December	January 15 the following year

Note that you must have quite robust staff timekeeping and expense tracking systems in place in order to have the required records available for preparing the reporting in the quite short 15 day time frame between the end of the reporting period and when the reports are due!

Once your organization has registered, you must file reports for the duration of the current biennial period, whether or not you have engaged in any lobbying since your last report, unless you terminate your registration earlier.

There are scaled late fees for failing to meet these deadlines, but they are not too onerous if the report is not significantly late.

Organizations that retain outside (“retained”) lobbyists may also be required to file a **Client Semi-Annual Report** in addition to Bi-Monthly Reports. Organizations that lobby only through their own employees or board members are **not** required to file this report but should be aware of the requirement to avoid confusion when you are using the LA system. Organizations that may be required to file a Client Semi-Annual Report can expect their outside lobbyist to provide additional guidance or may wish to contact the Commission for additional information.

NEW YORK CITY RULES:

- Organizations that use only their own staff to lobby and that go over the \$5,000 New York City trigger threshold but remain under \$10,000 in annual New York City lobbying expenses can theoretically file New York City reports only twice annually, for the periods January through June (due July 15) and July through December (due January 15), but as of the time of the publication of this Guide, this modified filing status has not yet been implemented in the City’s E-Lobby system, and for now all filers still need to file Bi-Monthly Reports on the same reporting schedule as the State.
- Organizations that retain outside lobbyists may also be required to file a New York City Client Annual Report in addition to the periodic reports.
- Remember that almost all New York City lobbying work must **also** be reported to New York State.

Q: What information do the periodic lobbying reports include?

The Bi-Monthly Report contains the contact information for your organization and for any individuals who engaged in lobbying activity on your behalf during the relevant period. Note that once your organization is registered, even a small amount of lobbying by one or more employees or designated lobbyists (e.g., board members) must be reported for each period, and you may need to add on new Individual Lobbyists or Designated Lobbyists to your organizational profile if any additional new staff or directors start to do direct lobbying communications on your behalf. You can minimize the number of employees who need to become registered lobbyists if you have all direct communication with public officials be through your existing Individual Lobbyists.

The Bi-Monthly Report must also identify the subject matter of your lobbying, the governmental action that it attempted to influence, and the public official toward which the lobbying was directed (including the intended target of any grassroots lobbying).

Most importantly, each Bi-Monthly Report must contain all reportable staff compensation (prorated for lobbying) and expenses incurred during the relevant period. The categories of reportable expenses are the same categories that were outlined above in the trigger calculation section.

NEW YORK CITY RULES: Much like the New York State reporting, the New York City periodic reports include the employee or employees who engaged in lobbying, a description of the subject or subjects lobbied (i.e., the government action), the lobbying target, and compensation and expenses incurred in the relevant reporting period.

Q: What is considered a reportable “expenditure”?

As discussed above when we examined the trigger requirements for registration, reportable lobbying expenditures in New York State are categorized either as **compensation of lobbyists** or **expenses** related to lobbying. Somewhat counterintuitively, the prorated salaries of non-lobbying staff who support lobbying activities are considered expenses, not compensation, but they are prorated and reported just like the salaries of your listed Individual Lobbyists.

Reporting of **lobbyist compensation** and non-lobbying staff time must be prorated on the basis of salary and other compensation, such as any year-end bonuses tied to the individual's lobbying but does not include benefits. Remember that it is not permitted for lobbyists to receive compensation contingent on the successful outcome of their lobbying work – see the FAQ below on restrictions on lobbyists.

The Commission’s regulations do not mandate any particular method of accounting, and they require only that a “good faith methodology” be used to prorate lobbyist and non-lobbying staff time.

Other non-compensation expenses must be itemized if they exceed \$75, but lower amounts may be aggregated.

The regulations themselves do not directly enumerate the categories of **expenses** that must be reported. However, the regulations expressly **exclude** filing fees, printing or postage that does not exceed \$500 in the aggregate, and travel, meals and lodging incurred by individual **lobbyists** (but not non-lobbyist staff). Significantly, New York **does not** require that **office overhead** items such as rent, utilities and telephones be allocated on a prorated basis to lobbying activities.

The **Lobbying Application** system itself provides a detailed menu of over 30 reportable expense categories in the areas of advertising, advocacy, social events and social media as we described in more detail in the registration trigger FAQ above.

It is important to note that the Lobbying Application menus may also appear to provide options to report overhead expenses like cell phones, internet, and so on, but as noted above, the regulations make it clear that overhead expenses are **not** required to be prorated and reported. You should only report lobbying expenses in these categories if

the cost is purely for lobbying that your organization would not otherwise have incurred for your other non-lobbying work.

If your organization incurs an expense in connection with its lobbying and you are unsure about whether it is reportable, consider seeking guidance directly from the Commission.

Finally, bear in mind that time and money spent on any **federal** lobbying that you did, even if it was aimed at federal New York representatives or occurred in New York State is **not** considered reportable in New York.

Records and receipts: All expenditures of \$50 or more related to your lobbying work must be paid by check or supported by a receipt. The checks or receipt records must be maintained for three years from the date the expense was required to be reported.

Gift ban: With some exceptions, registered lobbyists and members of their immediate family are prohibited from giving anything of more than “nominal value” to public officials. It is a good idea for a registered lobbyist to check with counsel before providing free gala tickets or anything else of value to a public official.

It is also important to note that regulations relating to lobbying expenditures almost always intersect in complicated ways with State and local ethics and “gift ban” laws. Those State and local rules often apply even if your organization has not triggered lobbyist registration and may apply to a broader range of officials. You should be certain that you understand the intricacies of both sets of rules before giving any gifts to, or paying expenses for, any public officials at the State or local level. More information is available from the Commission at <https://ethics.ny.gov/gifts>

NEW YORK CITY RULES:

- New York City generally follows New York State in what kind of expenses need to be reported. You can see additional details in the NYC E-Lobbyist User Guide: https://www1.nyc.gov/html/misc/pdf/elobbyist_user_guide.pdf
- Records must be maintained for five years instead of three
- New York City has a gift ban that is similar to the State's

Q: What other special reporting might we need to do if we are registered?

There are several kinds of special reports that in certain circumstances your organization might need to file if you are required to register as a lobbyist in New York. We have mentioned these special reporting obligations briefly in the context where they might come up but explain in greater detail below how to determine if the special reporting obligation may apply to your organization.

• New York State’s Reportable Business Relationships Report:

If you need to register as a lobbyist in New York State, you need to disclose if your organization has any reportable business relationships (“RBRs”) with State officials. These are defined as an agreement (formal or informal) by your organization to pay more than \$1,000 to a state official or to an entity that the state official has a significant ownership stake in. A RBR can also exist if one of your organization's board members, top managers, or employed lobbyists makes the payment to a state official.

It is best practice to use the Commission’s Reportable Business Relationship Questionnaire to document that you inquired of each of the members of your board, your top managers, and your employed lobbyists to check if any such RBR’s need to be reported: <https://ethics.ny.gov/system/files/documents/2019/01/rbr-questionnaire-final-1219.pdf>

Some of the questions on this questionnaire are confusingly broad, and it is often easiest to start by looking at the list of “**State Persons**” that can trigger a reportable business relationship in the first place – see Question 4(a) for non-management lobbyists or Question 5(a) for top managers and board members – and then work back

to have the form completed for your records. You should keep these forms for at least three years.

Some examples of situations that can trigger a RBR are your organization has a contractual relationship with an individual who also teaches as an adjunct professor at a state university and is hence a State employee; one of your board members hires a law firm where a State legislator is partner; or your organization is renting an apartment in Albany to use during lobbying trips from a landlord who is a State employee.

See the State's user guide for how to disclose any RBR's if you think you may need to report such an arrangement:

https://ethics.ny.gov/system/files/documents/2020/12/reportable-business-relationship-filing-instructions_final-12_14_2020.pdf

- **New York State's Source of Funding Report**

This potential reporting obligation does not apply to 501(c)(3)s.

Some 501(c)(4)s and other non-501(c)(3) tax exempt organizations doing significant amounts of lobbying at the New York State and local level may trigger a Source of Funding report requirement. This report is only required if your organization spends more than \$15,000 **and** more than 3% of your total annual budget on New York lobbying in a single year.

Organizations required to file this report must disclose each of their donors who gave more than \$2,500 in aggregate to the organization during the year. For organizations using their own staff to lobby, this report gets filed on the Client Semi-Annual report which you would usually not otherwise need to file.

You may be able to request a disclosure exemption from the Commission in cases where disclosure of certain of your donors, or potentially all of your donors, may "cause harm, threats, harassments or reprisals to the donor or their property. Such determinations must be made by the Commission upon written request, using the standards listed in New York State's Source of Funding Regulations, 19 N.Y.C.R.R. Part 938 available here:

https://ethics.ny.gov/system/files/documents/2021/02/19-nycrr-part-938-source-of-funding-regulations_2.10.21.pdf

For more information about the Source of Funds disclosure rules and how to calculate the donation amounts to disclose (for most donations you will only report a fraction of the total donation amount), you should use these instructions:

https://ethics.ny.gov/system/files/documents/2021/06/2021-2022-sof-instructions-final-6_15_21.pdf

- **New York State's Disbursement of Public Monies Report**

In addition to the complicated rules for procurement lobbying that might sometimes apply to your work to obtain a grant of State funds, there is a special report called the Disbursement of Public Monies Report that may potentially apply. This report is only required if you are trying to influence the allocation of State funding (to your organization or elsewhere) that is more than \$15,000, your organization is already required to register, and you spend at least \$5,000 specifically to lobby for the desired allocation of funds. In any bi-monthly period where you meet this special trigger you would need to file this report, whether or not you got the allocation outcome you were looking for.

Additional details on how to file this special report can be found here:

https://ethics.ny.gov/system/files/documents/2021/03/2021_2022-dpm-filing-instructions-final-3_26_21.pdf

- **New York Department of State's Funding Disclosure Report**

This donor disclosure report is a separate, non-lobbyist obligation arising under Article 7-A of New York's Executive Law requiring certain organizations to file financial reports

with the Department of State. Executive Law Sections 172-e and 172-f lay out this potential filing requirement, which usually applies to only a small subset of 501(c)(3) organizations but does potentially apply to many 501(c)(4) organizations.

- 501(c)(3) organizations will only trigger this funding reporting obligation if they give in-kind donations of \$10,000 or more to a 501(c)(4) organization spending more than \$15,000 **and** more than 3% of its total annual budget on New York lobbying in a single year.
- 501(c)(4) organizations trigger this reporting obligation if they spend more than \$10,000 in a calendar year on one or more written communications, conveyed to more than 500 people, that advocate for or against certain legislation or executive branch decisions, or for or against actions by certain public officials. It is possible that the work of 501(c)(4)s outside of New York also get counted towards this filing obligation!

We note that in 2019 a federal court issued a permanent injunction against enforcement of a prior versions of Executive Law 172-2 and 172-f because they violated the First Amendment. There is no new ruling on the current versions of these laws.

For more information see the Lawyers Alliance for New York fact sheet here:

https://lawyersalliance.org/userFiles/uploads/legal_alerts/New_NY_Department_of_State_Reporting_Requirements.pdf

There is also additional information on how to file on the Department of State's website here: <https://dos.ny.gov/financial-reports-be-filed-certain-not-profit-organizations>

If your organization believes you might be required to file these reports, you should seek further advice from legal counsel about the status of any potential injunctions against enforcement.

NEW YORK CITY RULES:

- **New York City's Paid Political Consulting Report**

New York City registered lobbyists must also report paid political consulting and all political fundraising, even when done on a personal or volunteer basis. The reporting obligation includes a look back period of six months prior to the beginning of the year of the lobbyist's initial registration, and it may apply to members of the lobbyist's immediate family as well. This filing is done online using the New York City E-lobbyist system.

Q: Are there special rules about lobbying coalitions in New York?

Yes, but don't panic!

New York State has some new rules in place for coalitions that lobby together that can appear complex, but for smaller organizations they will often either not apply to your work at all, or not really change the way you need to think about your potential lobbying registration or reporting obligations.

These special New York coalition rules only apply to coalitions of otherwise-unaffiliated entities where the members of the coalition decide to pool funding and/or in-kind resources of the group for the primary purpose of lobbying under a shared agenda, or if the coalition members use the coalition's name when they are lobbying. The rules **do not apply** to informal coalitions of organizations simply coordinating their thinking on their separate advocacy work that they do under their own names.

If your organization does decide to participate in a coalition where the New York coalition rules apply you will need to understand whether the coalition is going to be treated as a **structured coalition**, or an **unstructured coalition** and how you will need to report your coalition-related lobbying activity to the State.

FAQS

- A **structured coalition** is one in which the coalition has a name, a bank account, and an individual designated as President, Treasurer, or something similar. The members of this kind of coalition make financial contributions that are then used to hire lobbyists or buy ads. The members do not have their own reporting requirements with respect to their coalition contributions, and the contributions do not count towards the members' own registration trigger threshold. Smaller grassroots organizations do not usually participate in coalitions using this structure.
- An **unstructured coalition** is one in which the members use a coalition name in their lobbying communications but don't have a shared bank account or an individual designated as President, Treasurer, etc. The coalition members each report their own coalition-related lobbying compensation and expenses on their own organization's periodic reports if registration is triggered. Somewhat confusingly (since no money necessarily changes hands), on the periodic report the coalition-related compensation and expenses is reported as a "coalition member contribution." Remember that you only need to report your coalition work, together with any other lobbying work you have done during the year, if the combined total goes over the \$5,000 registration trigger.

In either case, your organization, as a member of a coalition subject to New York's special coalition rules, does not need to be concerned with the contributions of other members **unless** you are trying to act as the designated reporting member of a structured coalition. Reporting requirements for structured coalitions are complex and are beyond the scope of this Practical Guidance. The role is best suited to organizations that have sufficient staff resources to track and report member contributions, and regular access to experienced New York lobbying counsel.

NEW YORK CITY RULES: New York City does not currently have a coalition concept like the one for New York State.

Q: Do our organization's donors need to be disclosed on any lobbying reports?

Maybe, if you are not a 501(c)(3) organization.

Some 501(c)(4)s and other non-501(c)(3) tax exempt organizations doing significant amounts of lobbying at the New York State and local level may trigger a Source of Funding report requirement. This report is only required if your organization spends more than \$15,000 **and** more than 3% of your total annual budget on New York lobbying in a single year. The requirements for this report are outlined in more detail above in the FAQ on special reporting.

NEW YORK CITY RULES: New York City does not have a separate source of funding reporting requirement.

Q: How are our lobbyists required to identify themselves while lobbying?

There is no special requirement to wear badges or ID cards while lobbying in New York, but it is a good practice to identify yourself and your organization when meeting with a public official for the first time.

NEW YORK CITY RULES: New York City also does not impose any special requirements for lobbyist identification.

Q: Are there any other restrictions on lobbyists that we should be aware of?

In addition to the gift ban and the requirements to file Reportable Business Relationships and Disbursement of Public Funds reports that we have already discussed above, New York State prohibits paying lobbyists contingency fees based on securing passage or defeat of a covered government decision.

New York State does not restrict the campaign contributions or other political activity of lobbyists.

NEW YORK CITY RULES:

New York City imposes greater limitations on political activity by lobbyists, even when done in their own personal capacity.





- Individuals who are registered as lobbyists in New York City are unable to take advantage of campaign contribution matching, and may have lower contribution limits than the general public. These limitations also extend to members of their immediate family.
- New York City lobbyists must also report paid political consulting and all political fundraising, even on a personal or volunteer basis. The reporting obligation includes a look back period of six months prior to the lobbyist's initial registration, and it may apply to members of the lobbyist's immediate family as well. For additional details see the FAQ on special reporting.

Case Study STUDENTS VOTE NOW

Students Vote Now is a hypothetical small 501(c)(3) advocacy organization considering being vocal about Bill A1101 currently pending in the New York State Assembly

STUDENTS VOTE NOW IS CONSIDERING:

- Reaching out to its student constituents, via direct physical mailings, e-mails, and volunteer phone banking, in order to get the students to call their Assemblymember about the bill.
- Doing an in-person Lobby Day in Albany about Bill A1101 to meet with legislators, or alternatively arranging a virtual Zoom lobby event. The Lobby Day activity might potentially include renting a bus, buying T-shirts for the volunteer participants, and handing out some small swag type items from the organization to the legislators, or if done by Zoom, the purchase of an upgraded Zoom account.
- Testifying before a committee of the State Assembly regarding the student perspective on Bill A1101.
- Having an employee engage with the Mayor of Rochester about a similar, but separate, local ordinance being considered.

ACTIVITY	LOBBYIST REGISTRATION/REPORTING REQUIREMENTS
 <p>Student Engagement</p>	<p>This activity will be considered grassroots lobbying if the outreach communications identify Bill A1101, take a clear position for or against it, and include a clear call to action.</p> <p>If so, prorated compensation paid to the organization’s staff engaged in this outreach and the non-overhead expenses (print mailer cost over \$500, food for phone bankers; but not routine phone or e-mail system costs) will count towards New York’s \$5,000 registration threshold.</p>
 <p>Lobby Day</p>	<p>This is a direct lobbying activity, and prorated compensation paid to the organization’s staff engaged in this outreach and the non-overhead expenses of the Lobby Day (bus, T-Shirts, food for volunteers; but not the Zoom account) will count towards New York’s \$5,000 registration threshold.</p> <p>Students Vote Now should consider avoiding swag gifts and consider giving informational materials about the organization instead (cost of these materials over \$500 would count towards trigger threshold if they were lobbying specific).</p> <p>If registration is required, student volunteer participants do not need to be added to Students Vote Now’s registration or periodic reports unless they are members of the organization’s board who are directly lobbying.</p>
 <p>Committee Testimony</p>	<p>If the legislative committee holding the hearing has invited the students, or members of the public generally, to testify, then it is not considered lobbying. Otherwise, Students Vote Now will need to count the prorated staff time of preparing and giving the testimony. Given that the focus of the testimony is to provide a student perspective, the organization could consider allowing a student volunteer to appear, especially if doing so would help keep the overall prorated staff compensation low enough to avoid triggering registration.</p>
 <p>Mayor</p>	<p>Engaging with the Mayor of Rochester, if that engagement meets the definition of lobbying, will be counted toward the organization’s overall New York State registration and reporting threshold.</p> <p>If this city-level engagement were to be directed at the Mayor of New York City (or any other New York City official), it would also need to be considered toward the New York City expenditure threshold and potentially reported, but as described it is hard to see the effort reaching the \$5,000 NYC threshold.</p>
<p>Bottom Line</p>	<p>If Students Vote Now can keep its overall staff compensation and non-overhead expenses below the \$5,000 threshold, the organization will not need to register. The organization however would still need to keep careful track of its staff time and expenses if it thought it will come close to the trigger limit, and/or might potentially pursue additional lobbying activities during the year.</p>

ADDITIONAL RESOURCES

BOLDER ADVOCACY'S TECHNICAL HOTLINE:

Bolder Advocacy's free Technical Hotline team is always happy to help nonprofits and advocacy attorneys with more specific questions. You can contact Bolder Advocacy's team of experts by emailing advocacy@afj.org or calling 866-NP-LOBBY (866-675-6229).

NEW YORK STATE RESOURCES:

- **Commission on Ethics and Lobbying in Government (formerly "JCOPE")**
The New York State regulator has some extremely helpful resources including webinars, training videos, and formal guidance, all available here: <https://ethics.ny.gov/lobbying-overview>
- **Full Text of New York State Lobbying Statute and Regulations**
 - New York State lobbying statute (Legislative Law 1-a) can be found here: <https://ethics.ny.gov/sites/g/files/oeel281/files/documents/2017/10/legislative-law-1.pdf>
 - New York State's lobbying regulations, 19 N.Y.C.R.R. Part 943, are available here: <https://ethics.ny.gov/system/files/documents/2018/05/part-943-comprehensive-lobbying-regulations-5918.pdf>
 - New York State's Source of Funding Regulations, 19 N.Y.C.R.R. Part 938, are available here: https://ethics.ny.gov/system/files/documents/2021/02/19-nycrr-part-938-source-of-funding-regulations_2.10.21.pdf
- **Video Tutorial**
A video overview of the New York State laws, and tutorial on the online filing system is available here (select "Lobbying Overview Training and Demonstration" for the video and associated PDF deck): <https://ethics.ny.gov/lobbying-info-center>
- **Other Guides**
 - How to File an Initial Registration Guide: https://ethics.ny.gov/system/files/documents/2020/12/registration-and-registration-amendment-information_final-12_17_20-.pdf
 - How to File Bi-Monthly Reporting Guide: https://ethics.ny.gov/system/files/documents/2021/02/how-to-file-a-bi-monthly-report-and-amendment-in-la_final-2_23_21.pdf
 - Plain Language Guide to Procurement Lobbying: <https://ethics.ny.gov/system/files/documents/2018/03/plain-language-guide-procurement-lobbying31518.pdf>
 - Coalition Filing Requirements: https://ethics.ny.gov/system/files/documents/2022/07/coalition-filing-requirements-final-rebranded_7_5_22.pdf
 - Reportable Business Transaction Filing Instructions: https://ethics.ny.gov/system/files/documents/2020/12/reportable-business-relationship-filing-instructions_final-12_14_2020.pdf
- **Mandatory Ethics Training for Lobbyists**
<https://ethics.ny.gov/ethics-lobbyists-training>
- **Additional Questions**
Questions about New York State registration and reporting can be directed to the Commission's lobbying hotline, available from 8:30 a.m. to 4:30 p.m. Monday through Friday, at 800-87-Ethics (800-873-8442). Questions about registration and reporting can also be sent by email to Helpdesk@ethics.ny.gov.

Questions of a legal nature can be directed to a Commission attorney at 800-87-Ethics (800-873-8442 (option 2 for Attorney of the Day) or by email to legal@ethics.ny.gov.

ADDITIONAL RESOURCES

NEW YORK CITY RESOURCES:

- **New York City Lobbying Bureau**
New York City's Lobbying Law and Rules are enforced by the Lobbying Bureau, a section of the City Clerk's office. The Lobbying Bureau provides some useful resources and a FAQ here: <https://www.cityclerk.nyc.gov/content/lobbying-bureau>
- **Full Text of New York City Lobbying Ordinance and Rules**
New York City's lobbying ordinance can be found here: <https://www.cityclerk.nyc.gov/content/lobbying-bureau/lobbying-law-admin-code>
The Rules of the City of New York with respect to lobbying can be found here: <https://www.cityclerk.nyc.gov/content/nyc-lobbying-rules>
- **Mandatory Lobbyist Training**
Information about New York City's mandatory training for lobbyists is available here: <https://www.cityclerk.nyc.gov/content/training>
- **NYC E-Lobbyist User Guide**
A User Guide for how to use the online filing system for New York City is available here: https://www1.nyc.gov/html/misc/pdf/elobbyist_user_guide.pdf

LAWYERS ALLIANCE FOR NEW YORK RESOURCES:

Lawyers Alliance for New York is a nonprofit organization (not affiliated with Alliance for Justice's Bolder Advocacy program or the Democracy Capacity Project) that provides business and legal services to nonprofit and community development organizations in New York State.

- **Advocacy Tools and FAQs**
Lawyers Alliance provides some helpful tools and a FAQ related to lobbying here: <https://lawyersalliance.org/advocacy>
- **How Do New York State Lobbying Disclosure Rules Apply to Social Media?**
https://lawyersalliance.org/userFiles/uploads/legal_alerts/Social_Media_Lobbying_Legal_Alert_Nov_2018_FINAL.pdf
- **Lobbying Webinars**
Two informative recorded webinars are available from Lawyers Alliance for a small fee here: <https://lawyersalliance.org/recorded-webinars>
- **Question Hotline**
Lawyers Alliance also offers a help line at (212) 219-1800 x224



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This resource was prepared by The Democracy Capacity Project, a special project of NEO Philanthropy, Inc., with the assistance of Laura Abel, Senior Policy Counsel with the Lawyers Alliance for New York, and with thanks to the many, many advocates and activists who do this critical work every day.