

# PRACTICAL GUIDANCE

What Nonprofits Need to  
Know About Lobbying in

# CONNECTICUT

## Inside This Guide:

This Practical Guidance resource is designed to help your nonprofit organization determine if lobbying rules in Connecticut 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 Connecticut?

DIRECT OR GRASSROOTS LOBBYING OF:	CAN THIS TRIGGER?	TRIGGER
<b>State Legislators</b>	Yes	An individual or organization must register if they expend (or agree to expend) \$3,000 or more for direct or grassroots lobbying (including prep time, staff comp, and goodwill) in a calendar year <b>OR</b> if they receive (or agree to receive) \$3,000 or more specifically for Connecticut lobbying in a calendar year.  These are separate thresholds, so spending an aggregate of \$3,000 across both categories does not trigger registration unless that dollar amount is met in one of the categories alone.
<b>State Executive Branch Officials</b>	Yes	Same as above, with the triggers being cumulative over both legislative and executive kinds of lobbying.
<b>Local Legislators or Local Executive Branch Officials</b>	Maybe	The state lobbying law does not apply to local jurisdictions, but some local governments have their own lobbying ordinances.

### KEY LOBBYING TAKEAWAYS FOR NONPROFIT ADVOCACY ORGANIZATIONS IN CONNECTICUT:

- The key to lobbyist registration in Connecticut is lobbying expenditures of \$3,000 or more:** Any individual or organization who pays or receives at least \$3,000 for lobbying in Connecticut in a calendar year must register as a lobbyist. The calculation includes all activities related to lobbying, including preparation, travel, waiting time, and even goodwill.
- State nomenclature is a little unusual:** An individual (or firm) that receives money for lobbying and makes the communications is called a “communicator lobbyist.” Any organization (or individual) that pays another to lobby for them is called a “client lobbyist.” Both roles require registration, and both require periodic reporting.
- Generally, only your organization – the lobbyist employer (client lobbyist) – would need to report expenditures:** While both lobbyists and their employers must file reports, generally only lobbyist employers report expenditures. The exception is that your individual lobbyist would be responsible for reporting any unreimbursed expenditures they made on public officials.
- Reporting is very detailed, and record-keeping is important!** Registered lobbyists’ required reporting is very detailed, and reports are due only 10 days after month end. You also need to track and report legislative versus executive branch lobbying separately. You will need good systems for tracking your lobbying expenses, including detailed recording of staff time.
- Required state audits:** The state regulator also conducts random audits every year, so it is important to keep accurate records documenting your reported expenditures – you should maintain all records for at least three years.

This resource is current as of October 2023. 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.org](mailto:advocacy@afj.org) or at [info@democracycapacity.org](mailto: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/>

## Q: What activities count as lobbying?

In Connecticut, **lobbying** means communicating directly, or soliciting others to communicate, with any official in the legislative or executive branch of government or in a **quasi-public agency**, or with the staff of any such official, for the purpose of influencing any **legislative action** or **administrative action**.

- **Legislative action** means the introduction, sponsorship, consideration, debate, amendment, passage, defeat, approval, veto, overriding of a veto or any other official action or nonaction with regard to any bill, resolution, amendment, nomination, appointment, report, or any other matter pending or proposed in a committee or in either house of the legislature, or any matter that is within the official jurisdiction or cognizance of the legislature.
- **Administrative action** means any action or nonaction of any **executive agency** of the state with respect to the proposal, drafting, development, consideration, amendment, adoption or repeal of any rule, regulation or utility rate, and any action or nonaction of any executive agency or quasi-public agency regarding a contract, grant, award, purchasing agreement, loan, bond, certificate, license, permit or any other matter which is within the official jurisdiction or cognizance of such an agency.
- **Executive agency** means a commission, board, agency, or other body or official in the executive branch of the state government or any independent body of the state government that is not part of the legislative or judicial branch.
- **Quasi-public agencies** are state agencies chartered to operate outside of the executive branch. In Connecticut, their actions are considered administrative action for lobbying purposes. A list of quasi-public agencies can be found at: <https://portal.ct.gov/government/departments-and-agencies/quasi-public-agencies>

## Q: What triggers lobbyist registration and reporting with the state?

Lobbyist registration is triggered in Connecticut once an individual or organization makes expenditures or receives payment \$3,000 or more in a calendar year to lobby or engage in **activities in furtherance of lobbying**. Individuals are usually classified as

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**communicator lobbyists** and nonprofit organizations are usually **client lobbyists**. Nonprofits doing advocacy activities will generally find that once they are making expenditures in this sort of range, they will have triggered both an organizational registration, and at least one individual staff registration.

- **Activities in furtherance of lobbying** means expenditures for lobbyist compensation, research, reports, polls, media buys, activities fostering goodwill, office expenses, secretarial or paralegal salaries, etc. The term includes essentially any activities that support the actual lobbying efforts.
- **Communicator lobbyist** refers to an individual lobbyist (or a professional lobbying firm) that triggers registration because they are being paid to lobby on your organization's behalf.
- **Client lobbyist** means an organization (or individual) who pays (or agrees to pay) someone else at least \$3,000 to lobby for them in a calendar year.

## Q: How does the trigger threshold work if we are a fiscally sponsored project?

You will need to be sure you are communicating transparently and in a timely fashion with your fiscal sponsor if you plan to undertake activities that might potentially count as lobbying activities!

Each fiscal sponsor will have its own ways of working with projects who wish to take on lobbying activities.

In general, for fiscally sponsored projects that do not have their own legal entity and the fiscal sponsor engages all of the project's independent contractors or employees, the lobbyist registration trigger must be analyzed together with all of the projects housed at the fiscal sponsor who are doing lobbying activities in the state.

Your account manager at your fiscal sponsor will be able to help you understand how they track the registration threshold.

**IMPORTANT NOTE:** In states where registration is required prior to lobbying, or very shortly after the registration threshold is reached, or periodic lobbyist disclosure is due shortly after the end of a reporting period, special procedures may need to be worked out in order to process your project's registration or reporting on time. You should connect with your account manager as soon as you begin planning any potential lobbying strategy!

## Q: Are there exceptions to what counts as lobbying?

**Yes!** Certain types of lobbying activities do not require state-level lobbyist registration. The exceptions most relevant to nonprofit organizations are outlined below.

- **Haven't met the trigger threshold:** Individuals who do some lobbying, but do not expend, reimburse, or receive at least \$3,000 in any calendar year for such services are not required to register.
- **Public testimony:** Any individual or employee who receives no compensation or reimbursement specifically for Connecticut lobbying **and** who limits their lobbying activities solely to formal appearances to give testimony before public sessions of committees of the general assembly or state agencies.
- **Incidental lobbying:** An employee who is not compensated specifically for lobbying, but who lobbies Connecticut state officials for 5 hours or less in a calendar year, and who neither (1) makes expenditures or receives compensation of \$3,000 or more specifically for the lobbying activities, nor (2) expends \$50 or more on a public official, or the public official's staff or family. (This exception will mostly be relevant, if at all, to a highly paid employee who does a very small amount of lobbying, but might otherwise cross the prorated compensation threshold because of their high salary.)
- **Expert witnesses:** A person who provides legislative or administrative testimony at a public hearing, based on the individual's "specialized or technical expertise, beyond the

ken of the average layman, obtained through knowledge, skill, experience, training, or education.”

Note that anyone being put forth as an “expert witness” under this exception will need to file a statement of intent to provide testimony as an expert witness with the Office of State Ethics, along with a summary of his or her credentials.

If an employee of your organization testifies as an expert witness, and your organization is registered as a client lobbyist, then your organization will need to report any reimbursements or prorated compensation it paid for the testimony (including preparation and travel time, etc.).

**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](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?**

Voters in Connecticut cannot place matters on the ballot via initiative – Connecticut ballot questions are placed on the ballot by the legislature only. Communicating with legislators to influence whether a measure is placed on the ballot is lobbying in Connecticut, and subject to the rules described in this Guide.

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Once a ballot measure is on the ballot, however, Connecticut regulates supporting or opposing the ballot measure as campaign finance activity as opposed to lobbying (note, however, that the IRS continues to consider it lobbying activity at this stage).

Nonprofit organizations considering working on ballot measures in Connecticut should seek advice on how to comply with any applicable state or local campaign finance reporting requirements.

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

Once your organization or your lobbyist(s) meet the registration threshold, you must register with the Connecticut Office of State Ethics (OSE). During an odd-numbered year, the registration fee is \$250 and the registration is valid until the end of the next even-numbered year (Connecticut calls this time period a “biennium”). Registration in an even-numbered year is valid until the end of that even-numbered year and costs \$125.

### Organizational registration:

Registration is done through a simple online process. OSE has produced a helpful guide for registration of your organization (**client lobbyist**) here (see pp 7-9 on setting up an account, and pp 10-15 on actually registering): <https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>.

Note that for incorporated organizations, which almost all nonprofits are, you will need to give information about your officers and directors. Be sure to let your directors know that you will need to be making this disclosure and use your organizational business contact information for them as opposed to their personal contact information!

**IMPORTANT NOTE:** Do not answer any questions on the registration filing for organizations **organized for the primary purpose** of lobbying without discussing with an attorney, because in this case you may be required to disclose your larger donors!

### Individual registration:

There is also a separate guide for registering your individual lobbyists (**communicator lobbyists**) available on the same webpage: <https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>

The online portal for creating an account and registering is here: <https://www.oseapps.ct.gov/NewLobbyist/Registration/NewUser.aspx>

While there are no required trainings, you might want to consider reviewing a helpful online training course, available here: <https://portal.ct.gov/Ethics/Online-Ethics-Training/Training/Online-Training>

If either your organization or employee lobbyist cease lobbying during the registration period, and you can attest that they will not engage in any further activity that would require registration during the registration period, then they can terminate their registration via the system. Note that they are required to file a post-termination report between January 1 and January 10 of the year following the termination.

## Q: When are periodic lobbying reports due?

Once your organization and at least one of your lobbyists have triggered registration then both your organization **and** your registered lobbyist staff must file periodic reports. The organizational reports are more frequent and generally more detailed than the individual reports.

### Reports filed on behalf of your organization:

Your organization is responsible for filing three “quarterly” reports (Q3 and Q4 are filed together at one time). If you make more than \$100 in legislative lobbying expenditures during a month when the legislature is in regular session (January through June) then you will also need to file a monthly report that month. As long as your organization is

registered, you are obligated to file the quarterly reports, even if you have no lobbying activity to report.

• **Organizational (client lobbyist) report due dates:**

- January monthly report (if lobbied > \$100 in month) – Due February 10
- February monthly report (if lobbied > \$100 in month) – Due March 10
- First Quarter Report (required even if did not lobby in quarter) – Due April 10
- April monthly report (if lobbied > \$100 in month) – Due May 10
- May monthly report (if lobbied > \$100 in month) – Due June 10
- Second Quarter Report (required even if did not lobby in quarter) – Due July 10
- Combined Third and Fourth Quarter Report for July through December (required even if did not lobby in period) – Due January 10

**Reports filed on behalf of your employee lobbyist:**

Your registered employee lobbyist only needs to file a single annual report due January 10, unless they individually make any **unreimbursed** expenditures **for the benefit of public officials**. If any such unreimbursed expenditures are made, they will need to be reported on the same schedule as the organizational reporting above.

OSE has a handy “At-A-Glance Lobbyist Filing Calendar,” available here:

<https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>

**NOTE:** The deadlines for OSE filings are firm. You must file by the deadline even if it falls on a weekend or a holiday. Unlike in some other states, a weekend deadline will **not** be extended.

Reports must be filed online at:

<https://www.oseapps.ct.gov/NewLobbyist/security/loginhome.aspx>

Failure to file required reports can result in a fine of \$10 per day for each delinquent report, and up to a maximum of \$10,000 for some violations.

As noted in the previous FAQ, if your organization or employee lobbyist terminates registration during the registration period, they must still file a post-termination report between January 1 and 10 of the year following termination.

**Q: What information do the periodic lobbying reports include?**

**Organizational (client lobbyist) reports** include most expenditures of any kind made in furtherance of lobbying, including compensation paid to any employees who lobby or assist with lobbying (even if they have not triggered registration) and any expenditures made on public officials. A lot of detail is required on these reports, and the due date is only 10 days after the end of each period, so you should make sure you are both collecting the required data and can compile and report on it in the required time frame.

**Individual staff (communicator lobbyist) reports** require much less information, as they only include reporting of compensation received and any reimbursed expenditures and are due only once a year. Individual lobbyists must also file an additional report, on the same schedule as the organizational reporting, in any period where they make any **unreimbursed** expenditures for the benefit of public officials, their staff, or their families. You can ensure that your registered staff lobbyists (communicator lobbyists) only need to do one report a year if you make it a policy that they do not make any unreimbursed expenditures on public officials.

OSE has produced two separate helpful guides for filing organizational (**client lobbyist**) reports and individual (**communicator lobbyist**) reports here:

<https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>

## Q: What is considered a reportable “expenditure”?

Expenditure reporting in Connecticut covers a wide range of spending, and requires quite a bit of detail, so your organization should assess its operational capacity to maintain good records, and access those records efficiently, in order to satisfy its reporting obligations. You may find you need to put new processes and procedures in place to manage these lobbyist compliance tasks in Connecticut.

### EXPENDITURES REPORTED ON YOUR ORGANIZATIONAL (CLIENT LOBBYIST) REPORT:

As discussed above, the organizational (client lobbyist) reports are much more detailed (and more frequent) than the individual lobbyist reports.

There are comprehensive instructions about how to complete these organizational reports available in the **Client Lobbyist Guide** to the Code of Ethics published by OSE that is available here: <https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>

#### Payments tab in online report:

In this section you will need to report each payment made to your individual lobbyists (communicator lobbyists) or any payments made to outside organizations in furtherance of lobbying. You will need to report the payments related to legislative lobbying separate from those for administrative/executive branch lobbying, so you will need to carefully prorate your staff time into the right buckets. See page 21 of the November 2021 Client Lobbyist Guide.

Payments detailed in this section of the report include:

- Compensation and reimbursement payments for your external lobbyists.
- Prorated compensation and reimbursements for your registered individual in-house (communicator) lobbyists (not including fringe benefits).
- Payments for external services related to lobbying like polling, consultants, or media buys.
- Sales tax for the above payments (enter zero if your organization is exempt from paying sales tax).
- Expense reimbursements like mileage and parking paid in relation to any of the above.

#### Expenditures tab in online report:

This section captures expenditures not already reported in the payments tab above, and again, must be divided between legislative and administrative lobbying expenditures.

#### • Expenditures tab – expenditures for the benefit of a public official

In this section you must report the aggregate amount of spending you did in the period for the benefit of any public officials, even if the spending was under the \$10 itemization trigger. Each expenditure of \$10 or more also needs to get itemized with details in the “Transactions” tab as outlined below, and you must notify the public official recipient reported within 10 days of the expenditure.

Most nonprofits find it far easier to not give anything of value to any public official in Connecticut, whether or not in furtherance of their lobbying activities.

#### • Expenditures tab – paid media communications

In this section, you are required to report the aggregate amount of spending in the period for paid media and grassroots communications disseminated by printing, broadcasting or other medium that that refer to pending legislative or administrative action.

#### • Expenditures tab – solicitations

Here you report the aggregate amount of spending in the period for the solicitation of



other persons to communicate with a public official or state employee for the purpose of influencing any legislative or administrative action.

Note that the reporting requirements specifically exclude any expenditure your organization makes on a newsletter or other release intended primarily for your members or employees. This exclusion is available whether the communication is in hard copy or electronic form, or even if you made it orally during a regularly noticed meeting.

- **Expenditures tab – office expenses**

Connecticut requires your organization to report prorated office expenses you made in furtherance of lobbying, in the following categories:

- Telephone usage
- Postage
- Research and other miscellaneous expenditures made in support of lobbying
- Monthly rental for an office during any month during which the office is used for over 50% lobbying activities
- Fees and other costs of preparing lobby reports and other compliance with lobbying regulations (not including the registration fees, but including the cost of preparing the periodic reporting)

- **Expenditures tab – other lobbying expenses**

- This section captures lobbying related expenses not captured in the other sections.

- Prorated compensation for staff who lobby but have not triggered registration
- Prorated compensation for staff who assist those who lobby (paralegals, researches, clerical etc.)

Remember that the state conducts random audits, and if you are audited you will need documentation to support your reporting. You should keep documentation for each report for at least three years after the filing date.

The state has a useful manual on lobbying record-keeping available at:

<https://portal.ct.gov/-/media/Ethics/Guides/2018/ProceduresManualFinalpdf.pdf>

### Transactions tab in online report:

In this section you must **itemize** expenditures made for the benefit of any public official in the legislative or executive branch (or their staff or immediate family) whether or not the expenditure is related to lobbying. For more information on how to report any expenditures required to be reported under this tab please see Pages 22-29 in the November 2021 Client Lobbyist Guide.

### EXPENDITURES REPORTED ON YOUR INDIVIDUAL (COMMUNICATOR LOBBYIST) REPORT:

As noted above, your organization will be responsible for reporting almost all of the lobbying expenditures made in carrying out your lobbying programs. However, your employee lobbyists (communicator lobbyists) must also file an annual report every January reporting their prorated compensation for the previous year, as well as any reimbursements they received from your organization.

In addition to that requirement, if your employee lobbyist makes any **unreimbursed** expenditures on, or for the benefit of, public officials (or their staff or families), they must file an additional report, on the same calendar as the organizational reporting, during any reporting period where they made such expenditures. If your employee lobbyist makes no unreimbursed expenditures on public officials, as will be true for most nonprofit organizations, then they will not need to file any of these additional reports.

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You can refer to the detailed OSE guide for filing individual (**communicator lobbyist**) reports here: <https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page>

**Gift ban:** In general, gifts from lobbyists and lobbyist employers to public officials, candidates for office, their staff, and their families are generally prohibited, subject to limited exceptions. It is 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, and in Connecticut, it may be easier to simply not make any expenditures on public officials at all.

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

**Maybe!**

Connecticut has donor disclosure requirements that mostly apply to professional lobbying firms as organizations “formed primarily for the purpose of lobbying,” but can sometimes pull in 501(c)(4) organizations that might be doing a lot of lobbying during a particular period, since Connecticut presumes that if an organization makes 50% or more of its expenditures over a six month period for the purpose of lobbying that it was “formed primarily for the purpose of lobbying”.

If you do trigger this disclosure requirement you would be required to disclose donors of \$3,000 or more supporting your lobbying. You should seek additional legal advice if your organization does a substantial amount of lobbying and you believe you might potentially trigger donor disclosure obligations.

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

Anyone who is registered as a lobbyist must wear an official lobbyist badge while engaged in lobbying. This badge is available via the lobbyist’s online dashboard.

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

Paying lobbyists contingency fees based on securing passage or defeat of legislation or administrative action is prohibited.

Individuals can be fined a penalty of \$10,000 for each violation of the Connecticut lobbying rules, and intentional violations can result in a prohibition from engaging in lobbying for up to two years.





No lobbyist may do anything that places a public official under a personal obligation (such as providing a legislator with a loan).

# Case Study STUDENTS VOTE NOW

Students Vote Now is a hypothetical small 501(c)(3) advocacy organization considering being vocal about Bill 101 currently pending in the Connecticut House of Representatives

## 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 state house representative about the bill.
- Doing an in-person Lobby Day at the state capital about Bill 101 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 House of Representatives regarding the student perspective on Bill 101.
- Having an employee engage with the Mayor of Bridgeport about a similar, but separate, local ordinance being considered.

ACTIVITY	LOBBYIST REGISTRATION/REPORTING REQUIREMENTS
 <p><b>Student Engagement</b></p>	<p>These activities are grassroots lobbying, which is regulated in Connecticut. If Students Vote Now spends at least \$3,000 on lobbying (whether grassroots, direct, or both) it must register and will need to report its expenditures, including on grassroots lobbying. If any staff person exceeds the trigger by earning or being reimbursed at least \$3,000, that person must also register.</p>
 <p><b>Lobby Day</b></p>	<p>These activities are direct lobbying, so if Students Vote Now crosses the expenditure threshold, it will trigger organizational registration. All expenditures made in furtherance of Lobby Day will count towards the threshold, including work done in preparation of the event. Similarly, if staffers receive reimbursements or prorated compensation that exceeds the \$3,000 threshold, they will need to register as well.</p>
 <p><b>Committee Testimony</b></p>	<p>If a staffer who is otherwise compensated for state-level lobbying activity testifies at the committee hearing, their prorated compensation for the time spent testifying (and preparing to testify), as well as any additional expenses, will count towards the registration and reporting threshold. A staffer who is <b>not</b> otherwise compensated for Connecticut state-level lobbying, however, will not need to register based solely on their appearance at a public hearing.</p> <p>If Students Vote Now believes a volunteer or a Board member could testify effectively, their appearance will not count towards the lobbyist registration threshold for either the organization or the individual testifying.</p>
 <p><b>Mayor</b></p>	<p>Connecticut state law does not regulate lobbying local officials. However, Bridgeport has a lobbying ordinance,<sup>1</sup> which says that anyone (individual or organization) who earns or makes expenditures of \$500 in a calendar year to lobby Bridgeport officials, must register as a lobbyist with the city. Depending on how much time the organization expects to spend on this activity it may need to separately register with the city.</p>
<p><b>Bottom Line</b></p>	<p>If Students Vote Now engages in all of these activities, it will almost certainly expend \$3,000 or more and therefore trigger organizational registration. If it does register, the required organizational reporting is quite detailed, so it may need to enhance its operational and recordkeeping capacity to ensure it can meet its obligations.</p> <p>The activities may also trigger individual staff registrations, but the employee lobbyist reporting obligations are much less detailed and are only required once a year.</p>

<sup>1</sup> [https://library.municode.com/ct/bridgeport/codes/code\\_of\\_ordinances?nodeId=TIT2ADPE\\_CH2.39COETLO](https://library.municode.com/ct/bridgeport/codes/code_of_ordinances?nodeId=TIT2ADPE_CH2.39COETLO)

## ADDITIONAL RESOURCES

### BOLDER ADVOCACY'S TECHNICAL HOTLINE:

Bolder Advocacy's free Technical Assistance 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 e-mailing [advocacy@afj.org](mailto:advocacy@afj.org), or calling 866-NP-LOBBY (866-675-6229) during standard business hours.

### CONNECTICUT STATE RESOURCES:

- **Connecticut Office of State Ethics**

The Office of State Ethics (OSE) oversees, administers, and enforces the state ethics and lobbying codes. <https://portal.ct.gov/Ethics>

- **Full Text of Connecticut Lobbying Statutes**

The full text of the Connecticut state lobbying statute (General Statutes of Connecticut Title 1, Chapter 10, Sec. 1-91 et seq.) can be found at: <https://portal.ct.gov/ethics/statutes-and-regulations/statutes-and-regulations/codeofethicsstatutes#PARTII>

- **Full Text of Connecticut Lobbying Regulations**

The full text of the Connecticut state lobbying regulations can be found at: <https://portal.ct.gov/Ethics/Statutes-and-Regulations/Statutes-and-Regulations/Regulations>

- **State Training Materials (for public officials and employees)**

While there is no training requirement for lobbyists, OSE offers in-person and online training courses for state officials and employees. It can be accessed at: <https://portal.ct.gov/Ethics/Online-Ethics-Training/Training/Online-Training>

- **Helpful State Guides and Procedural Manuals**

Client Lobbyist Guide to the Code of Ethics: <https://portal.ct.gov/-/media/Ethics/Guides/Currently-Posted-Guides/Client-Lobbyists-Guide-Rev-November-2021.pdf>

Communicator Lobbyist Guide to the Code of Ethics: <https://portal.ct.gov/-/media/Ethics/Guides/Currently-Posted-Guides/Communicator-Lobbyists-Guide-Rev-November-2021.pdf>

Lobbyist Record Keeping Manual: <https://portal.ct.gov/-/media/Ethics/Guides/2018/ProceduresManualFinalpdf.pdf>

Documents Lobbyists Must Maintain for Audit: <https://portal.ct.gov/-/media/Ethics/Lobbyist/2021-22-Documents/2021-22-Documents-Lobbyists-Must-Maintain-for-Audit.pdf>

- **Additional Questions**

Any questions about lobbyist registration and reporting can also be directed by e-mail at [lobbyist.ose@ct.gov](mailto:lobbyist.ose@ct.gov) or telephone at (860) 263-2400 (M-F 8:30 AM to 5:00 PM).

### BOLDER ADVOCACY'S FEDERAL LAW RESOURCES:

While state and local laws regulate which lobbying activities require registration and reporting, the IRS also regulates how much lobbying a 501(c)(3) tax-exempt organization is allowed to do, including at the state and local levels. The way the IRS counts lobbying will almost always be different than how state and local laws count it, and organizations are urged to review Bolder Advocacy's federal law resources to ensure all IRS compliance obligations are being met. See:

<https://bolderadvocacy.org/resource/being-a-player-a-guide-to-the-irs-lobbying-regulations-for-advocacy-charities/>



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