



SEATTLE'S DIRECT LOBBYING LAW

[SMC Chapter 2.06](#)

Direct Lobbyist Guide for Reporting

In March 2008, the Seattle City Council voted to require that individuals paid to lobby the City Council and the Mayor's office register with the Seattle Ethics and Elections Commission (SEEC). The law went into effect on September 17, 2008. In December of 2020, the Seattle City Council updated the lobbying law with Ordinance 126260, which went into effect June 13, 2021.

This guide provides an overview of the process for registering and filing reports as a direct lobbyist with the City of Seattle. Please contact the SEEC if you have questions about how the law applies to a specific scenario.

1. Who must Register as a Direct Lobbyist?

Individuals who are paid or receive other consideration to communicate with City Council members, legislative department staff, the Mayor, or mayoral staff, Department Directors, Deputy Directors, or anyone who reports directly to a Department Director in an attempt to influence legislation must register and report.

Direct lobbyists who restrict their lobbying to four days or parts thereof during a calendar quarter – January through March, April through June, July through September, and October through December – and are paid no more than \$5,000 for lobbying in a given quarter are not required to file.

“Four days or parts thereof” does *not* mean 32 hours, it means any portion of a day spent lobbying counts as one of the four days. If a direct lobbyist has a single 10-minute telephone call with a City Councilmember on a Tuesday afternoon, that contact counts as one of the “four days or parts thereof.”

Appearances before public sessions of the City Council or its committees do not count toward the filing threshold

2. How are Direct Lobbying Reports Filed?

The SEEC has established an online filing system for reporting lobbying activity. Contact Chrissy.Courtney@seattle.gov for login credentials.



3. When do Direct Lobbyists have to Register and Report?

A direct lobbyist must register with the City prior to lobbying the first time, or within 30 days of becoming a lobbyist, whichever comes first. If a lobbyist expects to qualify for the exemption for lobbying on no more than four days or parts thereof in a calendar quarter, then the lobbyist must register before lobbying on a fifth day.

Direct lobbyists must file quarterly reports. When the due date falls on a weekend or a holiday, reports are due the following business day.

Quarterly reporting dates:

Due April 15	1 st Quarter: the reporting period of January 1 to March 31
Due July 15	2 nd Quarter: the reporting period of April 1 to June 30
Due October 15	3 rd Quarter: the reporting period of July 1 to September 30
Due January 15	4 th Quarter: the reporting period from the previous calendar year of October 1 to December 31

4. What Must Direct Lobbyists Report?

Direct lobbyists will need to report the following information when registering:

a. Information about the lobbyist:

- Name, permanent business address, telephone number, and e-mail address.

b. Information about the lobbyist's employer:

- Name, permanent address, telephone number, e-mail address.
- Occupation or business.

c. Information about the engagement:

- Expected duration of the lobbyist's employment.
- Compensation for lobbying (whether provided to the lobbyist or a lobbying entity). This should be expressed as an amount over time – for example \$550 per week or \$100 per hour.
- Whether expenses will be reimbursed and, if so, what expenses will be reimbursed.
- Whether the employee provides other services to the employer, or strictly acts as a lobbyist.
- Subjects or legislation to be lobbied, if known. Provide the council bill, ordinance, resolution, or initiative number, if one has been established.

d. Employer Authorization: Written authorization from each employer confirming employment. The lobbyist's employer can provide written authorization by the following methods:



City of Seattle

Ethics and Elections Commission

- Email: ethicsandelections@seattle.gov
- US Mail: SEEC, PO Box 94729, Seattle WA 98124-4729

- e. **Custodian of Records:** Name, address, telephone, and email address of the person who will have custody of the accounts, bills, receipts, books, papers and documents necessary to substantiate all registration statements and reports. All such records shall be preserved for at least five years after the registration statement or report to which they pertain has been filed.
- f. **If the lobbyist is employed through a lobbying entity, such as a law firm, consulting firm, public relations firm or a similar organization:**
- Name of the lobbying entity.
 - Total compensation to be paid to the entity.
- g. **If the lobbyist is employed by a business or trade organization:**
- Name and address of each business or trade association or other organizational member of such lobbying entity.
 - Name of each person (individual or organization) who has paid the entity more than \$500 (not including membership dues) in the past two years or has already or agreed to pay more than \$500 for lobbying activities during the current year.

Quarterly Reports: Direct lobbyists will need to report the following information quarterly:

- a. **Compensation for lobbying and preparing to lobby:** Provide the amount of compensation paid during the quarter. If compensation was reported, then the subject of the lobbying must also be reported.
- If the lobbyist provided compensated services, including consulting, to the campaign of any candidate for City office, or a campaign for or against any City ballot measure, then the name of the candidate, measure, date of election, amount of compensation and a description of the nature of the services must be reported.
- b. **Expenditures for lobbying activity:** Expenditures are broken down into the following categories: Food and refreshments, living accommodations, travel, entertainment and other expenses or services (including but not limited to minor incidental expenses).

Lobbyists are encouraged to contact the Ethics and Elections Commission before providing food, refreshments or entertainment to City officials or employees. City officials and employees may violate the Ethics Code if they accept anything of value from people trying to influence their official actions.

- Unreimbursed expenses for phones, office space or office rents, or salaries for staff and secretarial assistance are not required to be included in the report.



- c. **Lobbying Details:** The lobbyist report must also include a description of the legislation being supported or opposed during the reporting period, and the council bill, ordinance, resolution, or initiative number, if established. In this section should also be included the names of the individuals lobbied, and the dates on which they were lobbied.

5. What Must Direct Lobbyists' Employers Report?

Employers/Clients of direct lobbyists have two reporting obligations:

- a. Confirm the lobbyist's employment in writing, known as the Employer/Client Authorization.
- b. Certify the accuracy of the lobbyist's reports after they have been filed.

Employer Authorization process:

Go to the Lobbying Disclosure Reports page:

<http://web6.seattle.gov/ethics/lobbying/Reports.aspx>

Find the Client/Employer Registration report to be authorized.

Click the Pop Up button.

Scroll down to the bottom of the report to find the "Fixed link to this report:[series of characters that identifies the report]"

Right click on the Fixed link and select Copy Shortcut from the options. Then paste that shortcut into a document or email.

Suggested Correspondence Template:

I [Employing Officer] authorize [Lobbyist's Name] to lobby on [Employing Organization's] behalf. [Lobbyist Name] has registered as a Lobbyist for this purpose with the Client/Employer Registration report linked to here:

[\[Insert the link to the Client/Employer Registration report here\]](#)

[Employing Officer's Name]

- a) Lobbyists' employers/clients or an officer of the employer/client entity have an annual expenditure reporting obligation. Employers/Clients/Officers have two options for meeting their yearly obligation:



1. Verifying, by signing or certifying along with the lobbyist, each quarterly report for the preceding calendar year by the last day in February of each year.

OR

2. Filing with the Commission by the last day in February of each year a statement disclosing for the preceding calendar year the following information:
 - The total expenditures made by the employer for lobbying purposes, whether through or on behalf of a registered lobbyist or otherwise;
 - The legislation the employer has been employing a lobbyist or lobbying entity, or compensating a lobbyist or lobbying entity to support or oppose, including council bill, ordinance, resolution, or initiative number, if established;
 - The name, permanent business address, business telephone number, and business e-mail address of each lobbyist or lobbying entity employed by the reporting person and the total expenditures made by the employer for each such lobbyist or lobbying entity for lobbying purposes;

AND

- Any contract the entity or any of its subdivisions has with the City of Seattle.

Option 1 – Employer/Client certifies their lobbyists' expenditure reports

For an employer to verify by signing or certifying along with the lobbyist, each quarterly report for the preceding calendar year by the last day in February of each year, we suggest using the following template with links for each of the quarterly reports of the lobbyist being certified.

I [Employing Officer's Name] verify, for those portions of the report that relate to [Employer/Client Name], the truth and completeness of the quarterly reports filed by my lobbyist, [Lobbyist's Name].

[Insert the quarterly link(s) to the Lobbyist Expenditure Report(s) here – Q1, Q2, Q3, Q4]

Sincerely, [Officer's Name] [Employer's Name]



City of Seattle

Ethics and Elections Commission

The Employer/Client must then send the completed signed certification to the Seattle Ethics and Elections Commission.

- Email to ethicsandelections@seattle.gov
- Or send by USPS to the Seattle Ethics and Elections Commission, PO Box 94729, Seattle, WA 98124-4729.

Example:

I verify, for those portions of the report that relate to Employer ABC, the truth and completeness of the following quarterly reports filed by my lobbyist, Person A. Person. [Q1](#), [Q2](#), [Q3](#), [Q4](#).

Sincerely,

Boss B. Person
Employer ABC

Please note: The links for the lobbyist's quarterly reports can be found by searching for the reports by the lobbyist name here: <https://web6.seattle.gov/ethics/lobbying/LobbyistList.aspx>.

[Democracy Vouchers](#) [Lobbying](#) [Whistleblower](#) [Commission](#)

Lobbyist Name List

What lobbyist name would you like to search for? [Expand lobbyist list](#)

Scroll down below the Employer reports section and select the quarterly report for authorization by clicking on [View report](#) to the right of the report.

Filing Reports

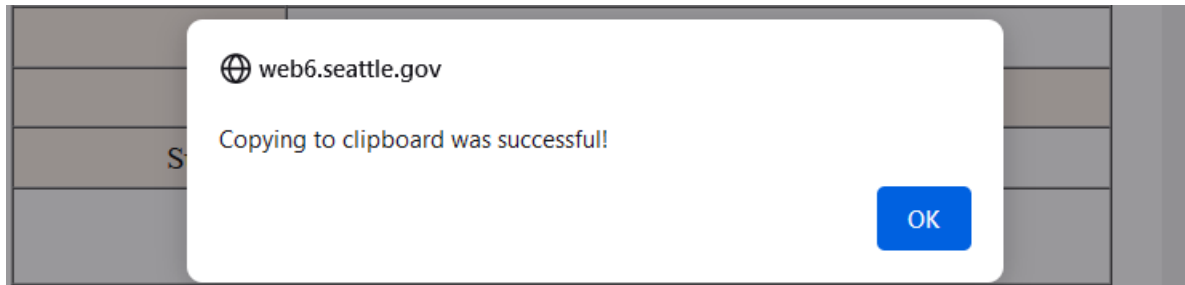
Filing Date/Time	Report Type	Period	
4/15/2022	Quarter	2022 - Q1	View report



When you click [View report](#), it will launch a pop up window. Scroll to the very bottom of that pop up window to find the spot that says **Copy the link to Clipboard.**



Click on Copy the link to Clipboard and there should be a message that Copying to clipboard was successful!



Then paste the link into the body of the certification template for that quarter, such as Q1, or for all Quarters.

Please contact ethicsandelections@seattle.gov if you need assistance.

Option 2 – Employer/Client files their own expenditure reports

Employers/Clients who choose option 2 will need to either file their own report or designate an agent to file the report on their behalf. That employer or agent will need to obtain a User Name and Password for the SEEC online lobbyist filing system, and then file the Client/Employer expenditure reports for the relevant quarterly reporting periods.

For information on obtaining a User Name and Password, or for general filing assistance, please contact Chrissy.Courtney@seattle.gov.

6. What Happens When the Terms of a Direct Lobbyist's Engagement Change, or the Lobbyist Stops Working for an Employer?

Within 30 days of a change to the terms of a lobbyist's engagement, or 30 days of a lobbyist's cessation of work for an employer as a lobbyist subject to the lobbying law, the



lobbyist must amend their registration statement.

Example: On November 1, Person Smith and ABC Inc. negotiate a new retainer, under which ABC will increase its payments to Smith by \$500 per month. Smith must amend their registration on or before November 30 to reflect the new compensation they'll receive as a lobbyist.

Example: Person Lu is reassigned to a new position in ABC, where they will no longer engage in lobbying. Within 30 days, Lu must provide a termination date on the ABC registration statement to reflect there is no further lobbying activity, and the employer must provide a certification for the reports filed by Lu.

7. What is the process for Terminating a Direct Lobbyist Registration with an Employer/Client?

To terminate a direct lobbying registration:

- a. File a Quarterly Report for the quarter in which the final lobbying activity occurs.
- b. Provide a termination date on the registration with the relevant Employer/Client.
- c. Request the relevant Employer/Client to file a final certification of any reports not already certified (or the Employer/Client may file a separate Employer's Report by contacting the SEEC.)

More information, including frequently asked questions, step by step guides with screenshots and other ways to search for reports can be found on the SEEC's [Lobbying Disclosure Home Page](#).

If you have suggestions for improvements to the guide or changes to the law or rules, do not hesitate to e-mail ethicsandelections@seattle.gov or Chrissy.Courtney@seattle.gov or call Chrissy Courtney at 206.437.6165.