

# Who is a Lobbyist?

Under the Municipal Lobbying Ordinance, an individual qualifies as a lobbyist when both of these thresholds are met within any consecutive three-month period:



The individual is paid to engage in at least **30 hours of lobbying activities** on behalf of another person;

*and*



The individual has at least **one direct communication**, either personally or through an agent, with a City official or employee in an attempt to influence a City matter.

**Lobbying activities** include:

- communicating with a City employee, drafting ordinances, resolutions, or regulations;
- providing advice or recommending strategy to a client or others;
- conducting research or gathering information;
- seeking to influence an outside party's position, through activities such as public relations or engaging with neighborhood councils;
- attending, monitoring, or providing public comment at City meetings (including neighborhood council meetings), hearings, or other events; and
- other similar activities.

A **direct communication** is an interaction with a City official or employee that provides an opportunity for an individual to urge the City official or employee to take a particular action. The interaction can be conducted personally or through an agent.

Some examples of direct communication are listed below.

- telephone call
- text message
- email
- letter
- face-to-face conversation
- testimony at a public meeting
- answer to a question posed by a City employee

**Exceptions include:**

Some contacts are not considered direct communications under the Municipal Lobbying Ordinance (MLO), such as a purely ministerial interaction with a City employee that does not involve an attempt to influence the employee about a discretionary outcome or course of action. Examples include the following: scheduling a meeting, asking for clarification about a regulation or law, or checking to see if a matter has been placed on an agenda.

Although a purely ministerial contact is not a direct communication, the time that is spent engaging in a ministerial contact does count as lobbying activity—and toward the 30-hour threshold—if it is related to an attempt to influence a City matter.

A City agency may label something as “ministerial” or “administrative,” such as a by-right development process, but that label does not supersede the MLO. Even in a process that is considered generally administrative, there may be interaction regarding an aspect of the process that is subject to discretion and, therefore, results in a direct communication.

## Search for Registered Lobbyists

Disclosed information about lobbying entities and their clients can be viewed and searched online.

### Alphabetical Lists and Reporting Summaries

<https://ethics.lacity.org/lobbyists/#summaries>

### Interactive Data Visualizations

<https://ethics.lacity.org/lobbying/lobbying-dashboard>

### All Data and Reports

<https://ethics.lacity.org/data/lobbying>

## FAQs

### If I qualify as a lobbyist, what do I need to do?

You must register with the Ethics Commission within 10 days after the end of the month in which you reach the qualification threshold. You must pay a registration fee for yourself and your clients. You must submit quarterly disclosure reports regarding your lobbying activities. And you are subject to bans on the following: making campaign contributions to City candidates or officeholders; making gifts to City officials; and serving as a City commissioner.

### Can anyone qualify as a lobbyist?

Yes. Regardless of title, training, or experience, any individual who meets the definition is a lobbyist. Some of the job titles of individuals who have registered as lobbyists include attorney, CEO, consultant, expeditor, executive director, government liaison, public service specialist, and union representative.

### What about staff of a business improvement district or a nonprofit?

They can also qualify. Any individual who meets the definition is a lobbyist. A very limited exception applies for the staff of specific 501(c)(3) organizations.

### My boss purchased billboard space asking people to contact their council members and urge them to vote against an issue that affects our company, but he did not speak with anyone at City Hall. Does that make him a lobbyist?

An individual does not qualify as a lobbyist unless they are compensated to have at least one direct communication with a City employee and engage in 30 hours or more of lobbying activity within a three-month period. If your boss did not have a direct communication either personally or through an agent, they do not qualify as a lobbyist. However, if they spent \$5,000 or more in a calendar quarter on their public outreach efforts, they would likely qualify as a “major filer” and must report their activity.



Los Angeles City  
ETHICS COMMISSION

This is a brief overview of laws that apply to lobbyists.

Please contact us for more information about how the laws apply to you.  
We are happy to help!

[ethics.lacity.org](https://ethics.lacity.org)

200 North Spring Street  
City Hall 24th Floor  
Los Angeles CA 90012

(213) 978-1960

### Reporting Violations

You may report possible violations to:  
(800) 824-4825 or  
[ethics.lacity.org/enforcement](https://ethics.lacity.org/enforcement).

Anyone who violates these laws (or aids and abets another person in a violation) may be liable for administrative penalties of up to the greater of \$5,000 per violation or three times the amount of money at issue.

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