

required to register unless they personally engage in five lobbying contacts (*see* section VI.A), it is possible that none of the employees who contribute to the lobbying organization's threshold would be required to register. If the lobbying organization does not provide information about the lobbying contacts had by those employees, there will be no public disclosure about them at all.

Requiring lobbyists to also provide information about their qualifying lobbying contacts provides more thorough public disclosure and indicates the lobbyist's registration deadline by identifying exactly when the individual qualified as a lobbyist. The information that is provided regarding the lobbying contacts should include each lobbying contact prior to registration, the dates of the contacts, the City agency that was contacted, the municipal decision at issue, and—for lobbying organizations—each employee who engaged in the contacts. For persons who elect to pre-register (*see* section VII.A, above), the Commission recommends requiring a statement that the requisite number of contacts has not occurred as of the date of registration. *See* proposed LAMC §§ 48.09(A)(5), 48.10(G), 48.11(F).

#### D. Terminations

<b>Recommendation</b>	<b>New Code</b>	<b>Old Code</b>
<i>Permit a lobbying entity to terminate its status through its final quarterly report.</i>	48.08(E)	48.07(H)

A lobbying entity's registration is valid through December 31 of the year in which the entity registered. *See* LAMC § 48.07(B); proposed LAMC § 48.08(C). However, a registration may be terminated before December 31. In fact, a registration currently must be terminated within 20 days after the registrant ceases all lobbying activity. *See* LAMC § 48.07(H).

A lobbying entity is required to file a quarterly report (*see* section VIII, below) for the quarter in which its registration was terminated, and the Commission recommends that the final quarterly report become the vehicle through which termination is accomplished. This change will significantly reduce confusion regarding whether and when a final quarterly report is due by eliminating a gap of up to four months between the date of termination and the date the final quarterly report is filed. It will also reduce the number of filings and improve efficiency for both filers and the Commission.

#### E. Method

<b>Recommendation</b>	<b>New Code</b>	<b>Old Code</b>
<i>Eliminate paper filings by accepting electronic signatures.</i>	48.07(B)	48.06.1(B)

Currently, lobbying registration must be done through the Lobbying Electronic Filing System (LEFS), an online system created by Commission staff. However, in addition to completing registration online through LEFS, lobbyists and lobbying firms must also file a signed paper copy of their registration statements. That paper copy is considered the original statement for audit and other legal purposes.