Advocacy and Nonprofits: What Your Nonprofit Needs To Know

Seattle University, Seattle, WA
June 6, 2017
Thank You To Our Sponsors:
Why Should Nonprofits do Advocacy Work

Sheila Babb Anderson, Campion Foundation and Stand For Your Mission
What is advocacy?

Public policy advocacy aims to address an injustice or create systemic social change through changes to the law or how the law is interpreted or applied.*

- Conducting policy research
- Working with the media/social media
- Educating the public
- Lobbying a legislator
- Meeting with a government regulator
- Filing a lawsuit
- Mobilizing voters

*From the Alliance for Justice Philanthropy Advocacy Handbook
Why we fund advocacy

Homelessness Spending

- Campion Foundation: $1.2 million
- King County: $45 million
- Washington state: $156 million
- Federal Government: $2.9 billion
Why is advocacy important?

It is essential to make programs work. It includes:

- appealing to the zoning board to get permission to have a farmer’s market in an underserved neighborhood
- requesting a parking variance to allow for a meal truck to serve homeless people in a central location
- educating a legislator about the value of funding a job training program for the community
- partnering with public agencies to repurpose an unused public building for a youth service program
- convening community leaders at times of natural disaster or human crisis to develop solutions for the community and promote healing
- Identifying barriers that homeless youth have when accessing federal financial aid and working with the administration to fix it.
Nonprofits get 32% of their funding from government sources.

Advocacy is the key.
Board members are an untapped advocacy resource.

Standforyourmission.org
You can do advocacy.

Advocacy

- Build Relationships
- Lobbying
- Advance an idea
- Form partnerships
- Inform decision making
RESOURCES FOR:

LOBBYIST

- LOBBYIST EMPLOYER
- GRASS ROOTS
- PUBLIC AGENCY

Lobbying

- Lobbyists
- Lobbyist Employers
- Grassroots Lobbyists
- Public Agency Lobbyists

Advertising Sponsors

Resources for sponsors who fund political advertising.

Elected & Appointed Officials

Resources for elected and appointed officials.

Other Filers

Resources for filers not included in the other categories including state and local appointed officials, elected officials and jurisdictions.
Lobbying Activities of Section 501(c)(3) Organizations

501(c)(3) must assure that “no substantial part” of its activities constitute attempts to influence legislation

or

Elect to follow the expenditure test on lobbying: the Section 501(h) election

• Allows charities to spend 20% of the first $500,000 in their annual operating budget on lobbying
• Total cap $1 million
• Provides very specific definitions of what constitutes lobbying (Section 4911)
The “no substantial part” test.

All facts and circumstances are considered.

- What percentage of the budget is involved?
- How much volunteer time is devoted to lobbying?
- How much publicity does the organization assign to its lobbying activities?
- Is lobbying activity continuous or intermittent?
- Other factors...

As a general rule or thumb:
- Under 5% of the budget is probably safe
- More than 15% is probably not.
- It is probably not safe to rely on rules of thumb!
The “Expenditure Test” – A Safe harbor:

How it works:
- The org may make “lobbying expenditures” up to a percentage of its “exempt purpose expenditures”.
- Begins at 20% of the first $500,000, then 15% of the next $500,000, etc.
- Cap of $1 million in total lobbying expenditure.
- Grass roots spending at 25% of the lobbying limit.

Pros & Cons
- Detailed regulations on how expenses are determined.
- Generally requires a tie to “specific legislation”.
- Special rules for mass media & member outreach.
- Must include spending of affiliates, e.g., a 501(c)(4) that controls or is controlled by the electing 501(c)(3).
### Qualifying for the Expenditure Test

**Public charities only.**

- The election is not available to churches or auxiliary religious organizations.
- Curiously, this was at their request.

**Requires an election on form 5678.**

- The election applies in the tax year in which filed.
- It remains in effect until revoked.
- Revocation is effective in the year *after* it is filed.
Penalties for Excessive Lobbying

Expenditure Test (IRC 4911)

- A tax penalty in any tax year where lobbying OR grassroots spending exceeds the statutory limit.
- Org. pays a 25% tax on amounts over the limit.
- Loss of exempt status only if the org. “normally” exceeds 150% of the allowed limit.

“no substantial part test” (IRC 4912)

- No tax unless exempt status is revoked for substantial lobbying activities.
- Org pays a 5% tax on all lobbying expenditures in the tax year when status is revoked.
- Additional 5% tax on any manager who “agreed” to the program of excessive lobbying.
Direct Lobbying (4 elements)

1. Communication to legislator or legislative staff, or government official who participates in forming legislation

2. Principal purpose to influence legislation
   - Includes: actions of Congress, state legislature, or local council
   - Does not include: executive action or the work of administrative agencies

3. Refers to specific legislation
   - Already introduced
   - Specific legislative proposal

4. Expresses a view on the legislation
Direct Lobbying (Referendum and Initiative)

- Communication to the public
- Expresses a view on a referendum or initiative
Exceptions to Lobbying

- Nonpartisan analysis, research and study
- Technical advice or assistance
- “Self-defense”
- Broad social and economic issues
“Self Defense”

Appearance before a legislative body

With respect to action

That might affect the existence of the “electing public charity”

Or its powers & duties, exempt status, or deductibility of contributions to the organization.
Non-Partisan Analysis

Is oriented to issues and requires a fair and objective exposition of all sides of the issue involved.

The material is available to the public as well as to the legislative body.

The organization is not advocating for/against any specific legislation. No “call to action”. 
Grass Roots Lobbying (5 Elements)

- Communication to the public
- Attempting to influence specific legislation
- Refers to specific legislation
- Reflects a view on the legislation
- Includes a “call to action”
“Call to Action”

- Tells the recipient to contact a legislator
- States the address, telephone number or similar information of a legislator or staff
- Provides a petition, postcard, etc., for contacting a legislator or staff
- Identifies key legislators
What do Lobbying Rules Mean?

• Highly recommend making the Section 501(h) election, because it provides the certainty of bright-line rules.

• Know the rules. (IRS & State law)

• Create a procedure for tracking expenditures that are attributable to direct and grassroots lobbying activities.

• Calculate lobbying expenditures limits based on estimated operating budget for the year, so that it is clear what lobbying budget will be.

• Leverage volunteer power.
Political Activity

• Section 501(c)(3): Prohibition against supporting or opposing candidates for political office

○ Speakers and awards during election cycles

○ What is “political office?”
Political Activity

• Section 501(c)(3): Prohibition against supporting or opposing candidates for political office
  • Speakers and awards during election cycles
  • What is “political office?”
Consequences of Political Activity

- 10% tax on political campaign expenditures (IRC 4955)
- Up to 25% tax on excess lobbying expenditures (IRC 4911, 4912)
- Possible revocation of exempt status.
What if you want to engage in political activity?

Consider establishing a 501 (c) (4)

• Operated exclusively to promote social welfare
• Promoting the common good and general welfare of the community
• Engage in unlimited lobbying and limited electoral activity (60-40 rule)
• Reporting requirements
• Contributions are not tax deductible
What if you want to engage in political activity?

• Consider establishing a 501 (c) (4)
  – Operated exclusively to promote social welfare
  – Promoting the common good and general welfare of the community
  – Engage in unlimited lobbying and limited electoral activity (60-40 rule)
  – Reporting requirements
  – Contributions are not tax deductible
What can a 501 (c) (4) do?

Political Campaign Activity

- Endorse specific candidates.
- Give to PACs.
- Public statements for/against.
- Distribution of materials (yours or others).
- Independent expenditure activity.
What can a 501 (c) (4) do?

- Political Campaign Activity
  - Endorse specific candidates.
  - Give to PACs.
  - Public statements for/against.
  - Distribution of materials (yours or others).
  - Independent expenditure activity
More?

- Form a state PAC (political action committee)
- Direct candidate contributions
- Coordinated campaign activity
- Know the rules
Washington State Law
Requirements: Lobbying Activity

Evelyn Fielding Lopez
Where To Go for Help: www.pdc.wa.gov
Are You Lobbying?

Focus is on state legislation or state agency rule/enactment:

RCW 42.17A.005

(30) "Lobby" and "lobbying" each mean attempting to influence the passage or defeat of any legislation by the legislature of the state of Washington, or the adoption or rejection of any rule, standard, rate, or other legislative enactment of any state agency under the state administrative procedure act, chapter 34.05 RCW. Neither "lobby" nor "lobbying" includes an association's or other organization's act of communicating with the members of that association or organization.

(31) "Lobbyist" includes any person who lobbies either in his or her own or another's behalf.

(32) "Lobbyist's employer" means the person or persons by whom a lobbyist is employed and all persons by whom he or she is compensated for acting as a lobbyist.
Individuals who only monitor legislation and/or observe committee hearings and legislative floor debate do not need to register or report their activities.

Citizens who – on their own time and without payment or other consideration, write letters, make phone calls, send e-mails, or have personal visits with officials in order to express their views on issues – have no registration or reporting obligations so long as they do not spend money on whomever they are lobbying for such things as meals, drinks, or other entertainment, gifts, travel, or contributions.
But, If You Are...

- Attempting to influence legislation or agency rule making
- Frequency – have contacts with legislators or agency rule makers more than 4 days (or parts of 4 days) during any consecutive 3 months
- Or make expenditures for law makers or state employees of more than $25 in 3 months

You need to register as a Lobbyist.
Lobbyists Register by Filing an L1

• Lobbyist registration within 30 days of hire as lobbyist or before lobbying, registrations run for two years; re-register January of each odd year

• Lobbyist ID form - bio and photo
# Lobbyist Registration Form

## 1. Lobbyist Name

<table>
<thead>
<tr>
<th>Permanent Business Address</th>
<th>Business Telephone Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>State</th>
<th>Zip</th>
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</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cell Phone</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## 2. Temporary Vacation (county address during legislative session)

<table>
<thead>
<tr>
<th>E-mail Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

## 3. Employer's name and address (person or group for which you lobby)

<table>
<thead>
<tr>
<th>Employer's occupation, business or description of purpose of organization</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and address of person having custody of accounts, records, books or other documents which substantiate lobbyist reports. (Person responsible for producing the lobbyist-employer's annual L-3 report)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E-mail Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

## 4. What is your pay (compensation) for lobbying?

<table>
<thead>
<tr>
<th>$ ____________ per (hour, day, month, year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other: Explain:</td>
</tr>
</tbody>
</table>

## 5. Are you reimbursed for lobbying expenses? (Explain which expenses.)

<table>
<thead>
<tr>
<th>Yes: $ ____________ per</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes: I am reimbursed for expenses.</td>
</tr>
<tr>
<td>No: I am not reimbursed for expenses.</td>
</tr>
</tbody>
</table>

## 6. Does employer pay any of your lobbying expenses directly? (If yes, explain which ones.)

<table>
<thead>
<tr>
<th>Yes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No:</td>
</tr>
</tbody>
</table>

## 7. How long do you expect to lobby for this organization?

<table>
<thead>
<tr>
<th>Permanent lobbyist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Only during legislative session</td>
</tr>
<tr>
<td>Other: Explain:</td>
</tr>
</tbody>
</table>

## 8. Is your employer a business or trade association or organization which operates on behalf of its members or a representative entity which operates on behalf of businesses, groups, associations, or organizations? If yes, attach a list showing the name and address of each member or entity who has paid fees, dues or other payments over $1,640 during either of the past two years or is expected to pay over $1,640 this year.

<table>
<thead>
<tr>
<th>Yes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No:</td>
</tr>
</tbody>
</table>

## 9. Is your employer a committee, task force or county/county-based political action committee which will provide funds for you to make political contributions including purchase tickets to fund raising events? If yes, list the name of that political action committee.

<table>
<thead>
<tr>
<th>Yes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No:</td>
</tr>
<tr>
<td>Name of the committee:</td>
</tr>
</tbody>
</table>

## 10. Areas of interest. Lobbying is most frequent before legislative committee members or state agencies concerned with those subjects.

<table>
<thead>
<tr>
<th>CODE</th>
<th>SUBJECT Code</th>
<th>SUBJECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Agriculture</td>
<td></td>
</tr>
<tr>
<td>02</td>
<td>Business and consumer affairs</td>
<td>10: Higher education</td>
</tr>
<tr>
<td>03</td>
<td>Constitutions and elections</td>
<td>11: Human services</td>
</tr>
<tr>
<td>04</td>
<td>Education</td>
<td>12: Labor</td>
</tr>
<tr>
<td>05</td>
<td>Energy and utilities</td>
<td>13: Law and justice</td>
</tr>
<tr>
<td>06</td>
<td>Environmental affairs – natural resources - parks</td>
<td>14: Local government</td>
</tr>
<tr>
<td>07</td>
<td>Financial institutions and insurance</td>
<td>15: Transportation</td>
</tr>
<tr>
<td>08</td>
<td>Fiscal</td>
<td>16: Other - Specify:</td>
</tr>
</tbody>
</table>

## CERTIFICATION: I hereby certify that the above is a true, complete and correct statement.

<table>
<thead>
<tr>
<th>LOBBYIST'S SIGNATURE</th>
<th>EMPLOYER'S AUTHORIZATION:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Confirming the employment authority to lobby described in this registration statement.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DATE</th>
<th>EMPLOYER'S SIGNATURE, NAME PRINTED AND TITLE</th>
<th>DATE</th>
</tr>
</thead>
</table>

NOT VALID UNLESS SIGNED BY BOTH!
But Trust Me, Electronic Filing is Much Better
Lobbyist Profile Example

AARON KEATING

Address: 603 Stewart Street Suite 715
Seattle, WA 98101
United States

Telephone: 2065296371
Email: AARON@EOIONLINE.ORG

Temporary address during session:
United States

Aaron Keating is Managing Director of the Economic Opportunity Institute. He holds a Master of Public Administration from the Evans School of Public
Lobbyists File Monthly L2 Reports

- L2 Monthly Expense report filed by 15th day of following Month
- Includes
  - compensation
  - expenditures incurred
  - campaign contributions
  - reception expenditures
**Lobbyist Monthly Expense Report**

(as required by Chapter 387, 1986 Session Laws)

1. **Lobbyist Name**
   - Mailing Address
   - City
   - State
   - Zip + 4
   - New Address? □ Yes □ No

2. **This report is**
   - For the period
   - This report corrects or amends the report for
   - Business Telephone
   - ( ) - 

3. **Includes all reportable expenditures by lobbyist and lobbyist’s employee for or on behalf of the lobbyist incurred during the reporting period.**

<table>
<thead>
<tr>
<th>Expense Category</th>
<th>TOTAL Amount This Month</th>
<th>Amount paid from lobbyist’s own funds, not reimbursed or attributed to an employer.</th>
<th>Employer No.</th>
<th>Employer No.</th>
<th>Employer No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. COMPENSATION earned from employer for lobbying this period (salary, wages, retainer)</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. PERSONAL EXPENSES for travel, food and refreshments</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. ENTERTAINMENT, GRATUITIES, TRAVEL, SEMINARS for state officials, employees, their families</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. CONTRIBUTIONS is received, candidates and political committees</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. ADVERTISING, PRINTING, INFORMATIONAL LITERATURE</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. POLITICAL ADS, PUBLIC RELATIONS, POLLING, TELMARKETING, ETC. (See #17)</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. OTHER EXPENSES AND SERVICES (See #16)</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. TOTAL COMPENSATION AND EXPENSES INCURRED THIS MONTH</td>
<td>$</td>
<td>$</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**(Attach additional page(s) if you lobby for more than three employers.)**

11. **Employers’ Names**
   - No. (A)
   - No. (B)
   - No. (C)
   - No. (D)

12. Subject matter of proposed legislation or other legislative activity or rulemaking the lobbyist was supporting or opposing.
   - Subject Matter: Issue or Bill No.: Legislation Committee or State Agency Considering Matter
   - Employer Represented

13. Of the time spent lobbying, what percentage was devoted to lobbying: the Legislature ______% State Agencies ______%

14. **TERMINATION:** (COMPLETE THIS ITEM ONLY IF YOU WISH TO TERMINATE YOUR REGISTRATION)
   - Date registration ends: __________
   - Employer name: ______________________
   - Date:____________________
   - I understand that an L-2 report is required for any month or portion thereof in which I am a registered lobbyist. I also understand that once I have terminated my registration, I must file a new registration prior to lobbying for that employer in the future. All registrations terminate automatically on the second Monday in January of each odd numbered year.

15. **CERTIFICATION**
   - I certify that this report is true and complete to the best of my knowledge: LOBBYIST SIGNATURE DATE

**CONTINUE ON REVERSE**
Online L2 Report Example

Entertainment

<table>
<thead>
<tr>
<th>DATE</th>
<th>DESCRIPTION</th>
<th>PLACE</th>
<th>COST</th>
<th>TYPE OF OCCASION</th>
<th>PARTICIPANT LISTING</th>
<th>EMPLOYER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuesday, February 28, 2017</td>
<td>Dinner</td>
<td>Tracy</td>
<td>297.00</td>
<td>Entertainment</td>
<td>Reps. Cody, Kretz, Jinkins, Macri, Graves, Pelliciotti, Johnson, Stambaugh, Irwin, Melanie, Stewart, Laura Butler. Cost per person $48.</td>
<td>EVERGREEN TREATMENT SERVICES</td>
</tr>
</tbody>
</table>

Non-itemized entertainment.

No non-itemized entertainment expenses reported for February, 2017.
Receptions

• Must report total cost of reception and a list of attendees

• If legislators present must report per person cost

• Per person cost report eliminated if entire legislature, one entire chamber or two largest caucuses
L3 Employer’s Lobbying Expenses

- Includes lobbyist employees and contract lobbyists
- Due by last day of February covering expenses for the previous calendar year
- Must report campaign contributions over $110 in one month to law makers, if not reported on lobbyist L2 on L3c
Lobbying Expenses

1. Employer’s Name: [Complete name of company, association, union or other entity]

Attention: Identify person to whom inquiries about the information below should be directed, NOT the lobbyist.

Mailing Address: [Address]

Telephone: [Phone number]

City: [City]

State: [State]

Zip + 4: [Zip code]

E-Mail Address: [Email]

Year Report Covers: [Year]

This report must be filed by the last day of February. Include expenditures made and accrued during the previous calendar year for lobbying the Washington State Legislature and/or any state agency. Complete all sections. Use “None” or “0” when applicable.

2. Identify each of your lobbyists/lobbying firms below. In column 1, show the full amount of salary or fees each named for lobbying. In column 2, show the full amount paid (plus obligated) for other lobbying related expenses that were made by or through the lobbyist and reported by the lobbyist on the monthly L-2 report (e.g., contributions to legislative candidates, reimbursement for entertainment expenses, etc.). Compute the subtotals across and down the columns; put the grand total of expenses incurred by or through lobbyists in the space designated.

<table>
<thead>
<tr>
<th>Names of Registered Lobbyists (if payments were to lobbying firm, list firm name)</th>
<th>Col 1-Salary</th>
<th>Col 2-Other</th>
<th>Total Amount</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

Information continued on attached page

Total Expenses By or Through Lobbyists: 

DO NOT INCLUDE EXPENDITURES ALREADY ACCOUNTED FOR IN ITEM 1 ABOVE when completing items 3 through 7 below.

3. Other expenditures made by the employer for lobbying purposes. Show total expenditures made or accrued:
   a. To vendors or on behalf of or in support of registered lobbyists (e.g., entertainment credit card purchases): 
   b. To or on behalf of apartum witnesses or others retained to provide lobbying services who offer specialized knowledge or expertise that assists the employer’s lobbying efforts:
   c. For entertainment, tickets, passes, travel expenses (e.g., transportation, meals, lodging, etc.) and enrollment or course fees provided to legislators, state officials, state employees and members of their immediate families (Also complete item 9):
   d. For composing, designing, producing and distributing informational materials for use primarily to influence legislation:
   e. For gross room lobbying expenses, including those previously reported by employer on Form L-6, and payments for lobbying communications to clients/consumers (other than to corporate stockholders and members of an organization or union):
   f. Political contributions to candidates for legislative or statewide executive office, committees supporting or opposing those candidates, or committees supporting or opposing statewide ballot measures. (Also complete item 10):

4. Contributions made directly by the employer, including those previously reported on PUC Form L-3c. If contributions were made by a political committee associated, affiliated or sponsored by the employer, show the PAC name below.

5. Independent expenditures supporting or opposing a candidates for legislative or statewide executive office or a statewide ballot measure. (Also complete item 11)

6. Expenditures by or on behalf of legislators, state officials, or their spouses, registered domestic partners and dependents for the purpose of influencing, honoring or benefiting the legislator or official. (Normal course of business payments are not reportable.) (Also complete item 14)

7. Other lobbying related expenditures, whether through or on behalf of a registered lobbyist. Attach list itemizing each expense (i.e., show date, recipient, purpose and amount). Do not include payments accounted for above.

Total Lobbying Expenses: 

8. This report must be certified by the president, secretary-treasurer or similar office of lobbying employer.

Certification: I certify that this report is true, complete and correct to the best of my knowledge.

Signature of Employer Officer: 

Date: 

Printed Name and Title of Officer: 

CONTINUE ON REVERSE
Online L3 Report Example

2016-EVERGREEN TREATMENT SERVICES L3 Report

P Warnock
SWARNOCK@EVERGREENTX.ORG
1700 AIRPORT WAY S
SEATTLE, WA 98134-1518
United States
Phone: (206) 223-3644

Filed: February 10, 2017
Year Report Covers: 2016

Listed below are total salary and fees reported on the registered lobbyists/lobbyist firms monthly expense report (L2).

Compensation shows the amount incurred (what was paid and may be owing) during the year for lobbying-related compensation. This include any funds set aside for deferred income, bonuses or the value of similar deferred payments paid or due.

Expenses shows the amount in expenditures made to or through the lobbyists. Expenditures include amounts paid or due the lobbyist for: reportable personal expenses; entertainment, gifts and travel for legislators, state officials and employees and their families; contributions to elected officials, candidates and political committees that were transmitted or delivered by the lobbyist; advertising, printing, and other informational literature; and other reportable expenses paid to or through the lobbyist in support of your lobbying objectives.

<table>
<thead>
<tr>
<th>NAME</th>
<th>COMPENSATION</th>
<th>EXPENSES</th>
<th>TOTAL AMOUNT</th>
</tr>
</thead>
<tbody>
<tr>
<td>SUSAN S TRACY</td>
<td>$6000.00</td>
<td>$0.00</td>
<td>$6000.00</td>
</tr>
</tbody>
</table>

**TOTAL EXPENSES BY OR THROUGH LOBBYISTS**

$6000.00
Grass Roots Lobbying

Grass roots lobbying is defined as a program addressed to the general public, a substantial portion of which is intended, designed or calculated primarily to influence state legislation.

Typical grass roots lobbying expenditures include:

• newspaper advertisements to support proposed legislation,
• hiring a person to organize public meetings in order to influence action on issues being considered by the legislature,
• creating or maintaining websites, purchasing e-mail lists, or hiring someone to conduct other online activities, and
• hiring signature gatherers to circulate petitions for an initiative to the legislature.
Any person or entity making grass roots lobbying expenditures not reported by a registered lobbyist, a candidate, or a political committee exceeding $700 in the aggregate in a one-month period or exceeding $1,400 in the aggregate in any three-month period must file a grass roots lobbying report. Exception: If an organization sends a notice about pending legislation to its members, or a corporation sends a similar message to its stockholders, the expenses related to these activities are not reportable as grass roots lobbying.

The initial grass roots lobbying report (PDC Form L-6) must be filed within 30 days of becoming a sponsor of a grass roots lobbying campaign. Thereafter, sponsors file monthly reports on the 10th of the month covering the preceding calendar month. When the campaign is finished and the last report is being filed, check the final report box.
More Information

Public Disclosure Commission

www.pdc.wa.gov
Thank you for your interest and support.

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