



Community and Workplace Culture Committee

Ethics Education: Lobbying Program

Item 6a

September 8, 2025

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Subject

Ethics Education - Lobbying

Purpose

To briefly review with the Committee Metropolitan's lobbyist and lobbying firm registration and reporting requirements (Administrative Code Sections 7200 and 7220).

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Background

What is Lobbying?

- Lobbying generally means seeking to influence government action through written or verbal communication.

Is Lobbying prohibited?

- No. Transparency is required.

What do government agencies require of lobbyists?

- Agency lobbying requirements vary.
- Metropolitan's Lobbying program is defined in the Administrative Code.

Summary Definitions

Lobbyist—A person compensated \$2,000 or more per month to communicate directly with a Metropolitan official to influence a specific decision (including a contracting decision) of any Metropolitan official.

*Limited exceptions

Lobbying firm—A business entity compensated \$2,000 or more per month to communicate directly with a Metropolitan official to influence a specific decision (including a contracting decision) of any Metropolitan official.

Summary of Lobbyist and Lobbying Firm Policy

Metropolitan's overarching policy for lobbyists/firms:

- To maintain the highest standards of conduct for persons doing business with Metropolitan.
- That those attempting to influence Metropolitan decisions shall maintain the highest standard of personal honesty and fairness in dealing with (and carrying out duties on behalf of) Metropolitan.

*The policy states that these are the minimum ethical standards to be followed by lobbyists and lobbying firms.

Registration Requirements

Registration Statements—Lobbyists must file a registration statement with the Ethics Officer **prior to communicating** with a Metropolitan official for the purpose of influencing a decision of a Metropolitan official. Lobbying firms must file a registration statement with the Ethics Officer when the firm's lobbyist registers.

- Statements must include: Lobbyist/firm name, contact information, the entity employing the lobbying firm, client's name, and other information prescribed by the form.
- Registration is free.

Reporting Requirements

Lobbyists/firms must file quarterly reports and termination statements.

Quarterly reports must include:

- Lobbyist/firm name, topics the lobbyist attempted to influence, whether they communicated with board members and/or staff, client name, and other information prescribed by the form.

Termination statements must include:

- Lobbyists/lobbying firms, which have ceased lobbying, must file a termination statement.

*Lobbying registration and reporting forms, and completed filings, are available on Metropolitan's website.

Exceptions to Lobbying Rules

The following activities and individuals are not covered by these rules:

- Oral statements at a public hearing and written statements made as part of the public record.
- Individuals employed by, retained by, or holding office with government agencies.
- Employees of private entities [other than lobbying firms], including non-profits, seeking to influence a Metropolitan decision. [*External lobbyists retained to advocate on behalf of these entities are covered by the rules].
- “Decisions” involving ministerial acts, personnel matters, and collective bargaining.

Key Takeaways

- Lobbying requirements are intended to promote transparency and maintain the public's trust by disclosing who is attempting to influence government decisions.
- Lobbying is not prohibited.
- Registration and quarterly reporting is required.
- Registration and reporting forms are available on the MWD website: <https://www.mwdh2o.com/management/ethics-officer/> (Scroll down to “Lobbying Registration and Reporting”).
- Email questions to MWDLobbyistRegistration@mwdh2o.com or call (213) 217-5832 for more information.
- If a lobbyist or lobbying firm needs to register or file reports, please have them visit <https://www.mwdh2o.com/management/ethics-officer>



Questions?

