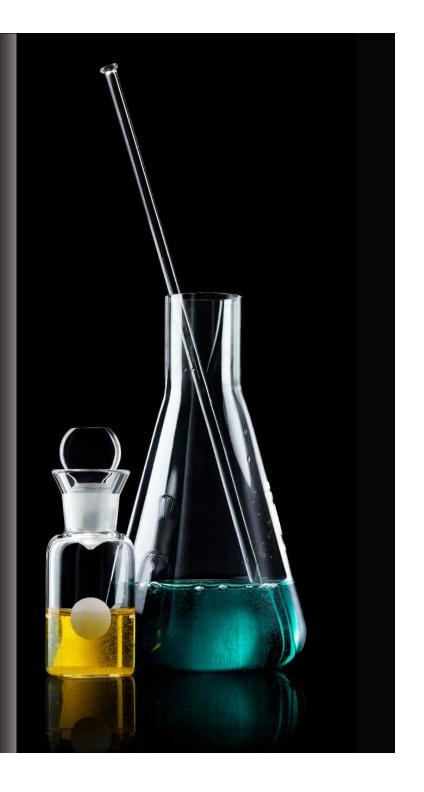
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Methods for Tracking Lobbying Activities

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Lessons Learned

- Hire a lawyer to help build a process
- If you can't do that, use a sample to set framework
- Put deadlines on the calendar
- Excel is your friend!
- Develop a tracking sheet with questions
- Time spent at fundraisers does not count!!!
- Give finance/payroll department plenty of time to get you the numbers
- BENCHMARK WITH INDUSTRY!

Office Culture: Emphasizing Importance of Compliance

- Schedule lobbying compliance training for all relevant new employees
- Annual refresher course conducted by outside counsel
- Registered Lobbyists; Policy, Advocacy, Alliance Development; Gov Affairs Admin; Executives
- Follow-Up with Adding Reporting Deadlines on their calendars
- Create Standard Operating Procedures



Step 1- Lobbying Tracking Sheet

NAME	
MONTH	
	AL 41.)

(Monthly)

WORKSHEET

INDIVIDUAL STAFF MEMBER'S LOBBYING ACCOUNT

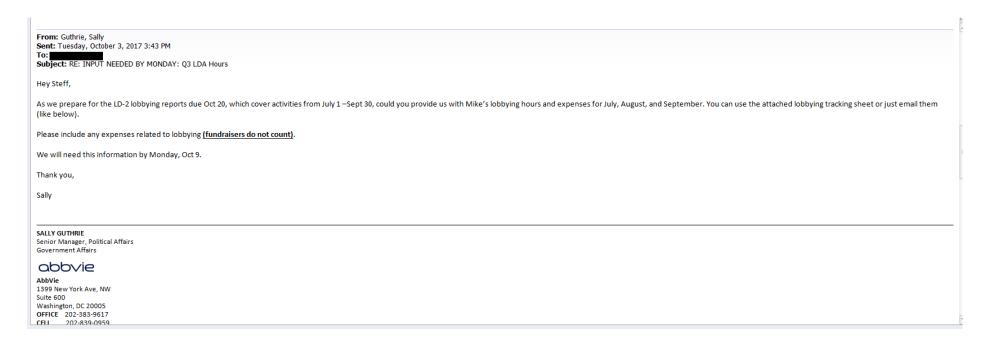
This worksheet is designed to enable [] to account for lobbying activities required to be reported to Congress pursuant to the Lobbying Disclosure Act ("LDA") and to capture expense which are non-deductible under IRS regulations. Please fill in the aggregate number of hours for each of the following activities. Time should be rounded to the nearest ½ hour. For example, if you spent 2 hours and 20 minutes on a category of activity, enter "2.5 hours."

_	Developing correspondence and statements for Congress legislatures on pending legislation or potential egislative initiatives, including research and preparation.	hrs.
• I [Drafting and analyzing federal legislation and legislative proposals, or attending hearings on the same, that] currently lobbies on or will address, including research and preparation.	hrs.
	Developing, coordinating, and conducting meetings whose purpose is at least in part to discuss legislative proposals, legislation, or lobbying strategy, including research and preparation.	hrs.
1	Legislative Proposals: Any communication (orally or written) to any federal government employee about egislation or legislative proposals that [hrs.
e 1	Federal Rules and Policies: Any communication to a covered legislative branch official or covered executive branch official (all Members and staff of Congress, White House staff, staff serving in Executive evels I-V, and all schedule C/political appointees) about federal rules and policies, regulations, Executive Orders, or other programs or policies of the U.S. government, including research and preparation.	hrs.
on: 1) officia	e: LDA contains significant exceptions to "lobbying contacts." Therefore, do <u>not</u> include time spent of providing information in writing to any covered agency official in response to a request from that all (time spent responding in writing to Congress should be captured below under IRS section) and y communication made in response to a public request for comments in the Federal Register [i.e. to f proposed rulemakings, draft guidance documents, or any other government publications] and	
notice	eparing and providing testimony to Congress (this too should be captured below under IRS	
notice 3) pre Section	eparing and providing testimony to Congress (this too should be captured below under IRS	hrs.
notice 3) pre Section A r	eparing and providing testimony to Congress (this too should be captured below under IRS on). Attending coalition and trade association strategy sessions regarding legislation, and non-excluded	hrs.



Get Your Emails Out Early

- Send the emails early, because you will need to follow-up on average up to 3 times per person
- Try to start the process as close to the start of the month that it is due (at the latest!)



Step 2- Get Busy in Excel Recording Hours and Expenses

Employee	April	May	June	Hours	Travel Expenses
John Doe	100.0	105.0	102.0	307.00	\$407.45
Jane Doe	90.0	82.0	71.0	243.00	\$100.00
John Doe	38.0	50.0	40.0	128.00	\$253.86
Jane Doe	25.0	0.0	0.0	25.00	\$0.00
Registered Lobbyist Total				703.00	\$761.30
Non-Lobbyists Totals				213.50	\$14,996.56
Totals for Q2				916.50	\$15,757.86

Step 2- Get Busy in Excel

Lobbying Re	porting for Q2	2017		
Name	Hours	Travel Expenses	Notes	More Notes
Registered Lobbyists	110010	Traver Expenses	110.00	more ness
John Doe	307.00	\$407.45	50% of DC cab costs (no trips in Q2)	
Jane Doe	243.00	\$100.00	50% of DC cab costs (no trips in Q2)	
John Doe	128.00	\$253.86	50% of DC cab costs (no trips in Q2)	
Jane Doe	25.00	\$0.00	covered to the control (no import in the)	
		V 0.00		
SUBTOTAL	703.00	\$761.30		
Non-Lobbyists				
ELT	1.00	Φ0.00	Federal Otratagian a 1818MANA	*DE
Jane Doe	1.00	\$0.00	Federal Strategies and PhRMA Meeting	*PE coordinates
Other Sr. Leaders				
Jane Doe	25.00	\$1,499.00	CLSA Board Meeting	*asked DB
John Doe	5.00	\$0.00	PhRMA Board Meeting and Calls	*PE coordinates
Jane Doe	0.00	\$0.00	BIO Board Meeting in NYC	*asked JF
John Doe	7.00	\$0.00	ÿ	*asked JS
Add Senior Leader				
TAS/Policy				
Jane Doe	10.00	\$0.00		*SG emailed
John Doe	38.00	\$2,500.00		*SG emailed
Other GA				
Jane Doe	13.50	\$2,666.63		*SG emailed G and A
John Doe	11.50	\$0.00		
Jane Doe	12.50	\$2,000.00		*SG emailed
John Doe	46.00	\$0.00		*SG emailed
Jane Doe	6.00	\$0.00		*SG emailed
		· · · · · · · · · · · · · · · · · · ·		
Tax				
John Doe	38.00	\$6,330.93		*asked DB
SUBTOTAL	213.50	\$14,996.56		
0 17:11:00	242.55	0.15 = 55 = 63		
Grand Total for Q2	916.50	\$15,757.86		

Send to Finance/Payroll

 Total lobbying hours from the lobbyists and non-lobbyists as well as their expenses

Then, time to focus on obtaining trade association dues

- Keep a detailed spreadsheet of trade association names, dues, and the contact at the association
- Contact them with plenty of time to obtain the percentage of membership dues allocable to federal lobbying activities!
- Send this all to Finance/Payroll because it takes a while for them to calculate the salary totals

Step 3- Benchmark with Industry

2016 Lobbying Disclosure Act Filings (Federal)			
Q1 2016			
Q2 2016			
Q3 2016			
Q4 2016			
2016 Total:	\$		

2016 Industry Lobbying Totals (Federal)		
1.	tais (reuerai)	
2.		
3. AbbVie		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
2016 Total:	\$	

2017 Lobbying Disclosure Act Filings (Federal)			
Q1 2017			
Q2 2017			
Q3 2017			
Q4 2017			
2017 Total:	\$		

2017		
Industry Lobbying Totals (Federal)		
1.		
2.		
3.		
4.		
5		
6. AbbVie		
7.		
8.		
9.		
10.		
2017 Total:	\$	

Step 4- Focus on the Issues

- Email Consultants for their reports to review (use a deadline, same script every time)
- Ask Trade Associations for their list of issues to review
- Setup time with lobbyists/head of office to review the lobbying issues from the DRAFT report
- After, that you're ready.....

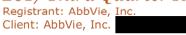


Step 5- File the Report



LD-2 Lobby Disclosure Report

2017 Third Quarter Report





United States Congress Lobby Disclosure Electronic Filing

Filing Status: Submitted

Step 6- Loop in Internal Stakeholders

- Send Confirmation to appropriate stakeholders (VPs, Public Affairs)
- Celebrate!
- Then, repeat.



Pros Vs. Cons of Tracking Internally or Hiring a Contractor

Cons:

- It will suck up your time!
- We wear many hats (not main job responsibility)
- Internal contact for when a POLITICO story breaks on lobbying numbers

Pros:

- The skills are always in demand companies value compliance
- You have the control
- Once you automate the process as much as possible, you have a streamlined process for the future

Questions?

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