

April 30, 1997

Re: IO-99-88

As to lobbying activity reports, §5-105 of the Public Ethics Law requires that lobbyists report:

(3) (i) the name of each employee, or member of the employee's immediate family, who has benefited from gifts with a cumulative value of \$50 or more during the reporting period, given by the lobbyist or anyone acting on behalf of the lobbyist, *whether or not the gifts were given in connection with the lobbying activities.*

(ii) if the cumulative value of \$50 is attained or exceeded, each gift shall be itemized by date, beneficiary, value, and nature of the gift.

It is irrelevant that you do not charge your clients for these expenses. I would suggest that you supplement your previous activity reports with the gifts from 1996 and that in future, you regularly submit a supplemental report with your lobbying activity reports, listing those gifts which you claim are not attributable to a particular client.

Please provide the supplement to your 1996 reports promptly. If you have any questions, please call any time.

Sincerely,

Betsy K. Dawson