Pay to Play in the U.S. Congress: An Empirical Analysis

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Abstract

Studying the United States lobbying industry has been a challenging task, mainly due to the lack of sufficiently detailed data on lobbying contacts. In this paper, we take advantage of the Foreign Agent Registration Act of 1938 (FARA), which mandates that lobbyists representing foreign entities submit a semi-annual report detailing all domestic political contacts, including information on with whom, when, why, and how those contacts were made. This comprehensive lobbying contact data enables us to systematically analyze the lobbying industry. We find that the lobbying fees vary with clients; in particular, the more democratic a foreign government is, the less lobbying firms charge for their lobbying services. We also establish a U-shaped relationship between the polity of a foreign government and the access cost of lobbying a member of the U.S. Congress, which is measured by campaign contributions made shortly before or after lobbying contact occurs. To explain these two main findings, we propose a framework in which politicians face reputational costs associated with granting access to unsavory foreign governments.

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1   Introduction

Scholars have attempted to understand how money influences access to politicians (Potters and Winden (1992); Austen-Smith (1995); Lohmann (1995); Grossman and Helpman (2001)). Despite the abundance of theoretical research, studying the link between money and access has been a challenging task, mainly due to the lack of sufficiently detailed data on lobbying contacts. In this paper, we make progress on this issue by taking advantage of the lobbying filings mandated by the Foreign Agent Registration Act (FARA). This act requires that lobbyists representing foreign entities submit a semi-annual report detailing all lobbying contacts, including information on who, when, why, and how those contacts were made. This comprehensive lobbying contact data, along with data on the campaign contributions by lobbyists hired by foreign governments, enables us to systematically study what role money plays in lobbying and access.

We study the lobbying reports submitted during the years 2008, 2009, and 2010 by the lobbying firms that collectively represent 85 distinct foreign governments. These reports include at least one targeting activity of the Congress, and the lobbying firms who represent their foreign clients submitted in total 559 bi-annual lobbying reports during three year period. The foreign countries collectively spent 126.7 million dollars to hire lobbying firms during the three year period, and 94.3% of the congressional contact by the foreign governments were conducted through the lobbying firms. This indicates that lobbying firms play an active role in bridging their clients into legislator in the Congress.

We find that the degree of access to politicians is strongly associated with the lobbying fees that firms charge its foreign clients. One additional member contact increases the fee by on average $3,000 per six month period. Politically well connected firms receive a high premium in the lobbying market. Second, after controlling the quality of the lobbying contact such as the number of contacted legislators, more democratic countries pay less fees to their lobbying firms on average by $134,000 per six-month period than less democratic countries.

Why do lobbying firms charge more less democratic foreign clients? There are three

potential explanations. The first explanation is that although observable quality of service seems similar, unobservable side of lobbying service could be different depending on client countries. However, even when we control lobbying firm characteristics such as years of experience in foreign lobbying industry and the domestic lobbying firm market shares which could be positively related to the unobservable service quality such as persuasiveness or effectiveness in communication, the main result regarding varying lobbying fee by clients is robust.

If unobserved quality differences do not sufficiently explain the systematic price differences, price discrimination provides an alternative source of explanation. If the market for lobbying firm is not competitive enough, and therefore, some lobbying firms have market power, price discrimination is possible depending on the willingness to pay by different clients. Due to the lack of access through diplomatic channels and the strained relationship with the U.S. in general, less democratic countries may be willingness to pay a higher access cost. However, lobbying industry turns out to be competitive. In each year, over 4,000 firms are active in the market and the average market share is .46%. The largest firm's market share is at most 2.63% on average across three different years.

We argue lobbying firms charge more on less democratic countries because costs of lobbying are different. The equilibrium described under endogenous lobbying theory is that the greater the bias in a group's preferences relative to the policymaker's preferences, the more it must spend to convince her that its evidence indicates a high level of policy (Grossman and Helpman (2001)). If it is safe to assume that distance between the bias of non-democratic countries and the members of Congress are greater than that of democratic countries, empirical patterns we find that lobbying fees are charged differently depending on types of countries are consistent with the prediction from the endogenous theory of lobbying.

In addition to the information transmission cost explored in the endogenous lobbying theory, we argue that there is an addition cost that needed to be explicitly considered: reputation cost. From the perspective of the politicians, meeting lobbyists who represent

3

autocratic countries or dictators is a risky business. Her opponent could use this information in the campaign to attack the politicians and there are more uncertainties on the information on the less democratic country's purpose to meet the legislators. This indicates additional costs on the shoulder of lobbying firms who represent less democratic countries. Lobbying firms may need to contribute more campaign contributions to politicians they want to meet or put additional efforts to verify the information when they represent less democratic countries. Lobbying firm's own reputation can also be damaged by representing autocratic regimes. Using data on campaign contributions by lobbying firms who are hired by foreign clients, we find a non-linear relationship (U-shaped) between foreign client characteristics and the propensity to make a "timely-contribution" which refers to campaign contributions that are associated with a 30-day window of the contact. This pattern of access cost cannot be explained by informational cost of lobbying and we interpret this results as a supporting evidence of the influence of reputation cost in determining the access cost.

This paper makes three contributions. First, to our knowledge, this is the most comprehensive empirical analysis of lobbying contact. Despite the rich theoretical works on lobbying, lack of contact information has prevented scholars from understanding the exact mechanism of access. Some scholars use survey data from the legislators (Langbein (1986)) and from lobbyists (Wright (1990); Hojnacki and Kimball (2001); Hall and Houweling (2012)) or campaign contributions as a proxy for access (Herndon (1982); Bertrand, Bombardini, and Trebbi (2014)). Although these studies advance our understanding on the lobbying process, previous method has its own limitation in the sense that survey data do not reflect the intensity of contact and there are significant contacts made without campaign contributions. Actual lobbying contact data along with campaign contribution by lobbyists who represent foreign countries allows us to investigate not only the intensity and the context of contacts but also the way the campaign contributions and lobbying fess are associated with contact in more details.

Second, this paper contributes to the literature on the value of political connection. In

4

a number of recent papers, scholars have presented how political connection benefits firms (Fisman (2001); Faccio (2006); Jayachandran (2006); Ferguson and Voth (2008)) or the value of serving in elected offices (Diermeier, Keane, and Merlo (2005); Eggers and Hainmueller (2009)). In the literature on lobbying, political connection that lobbyists possess have been emphasized as a key asset in lobbying services (i Vidal, Draca, and Fons-Rosen (2011); Bertrand, Bombardini, and Trebbi (2014)). Our paper shows that the value of access could vary depending on the types of clients lobbying firms represent.

Third, this paper helps us understand the role of a lobbying firm as an intermediary between interest groups and policy makers. Most of the political economy models of interest groups do not incorporate the lobbying firm in the model. They assume interest groups and policy makers directly communicate. However, majority of the lobbying activities are done by commercial lobbying firms, it is important to understand the role of lobbying firms. There is the theoretical literature on the role of lobbyists and lobbying firms (Ainsworth and Sened (1993); Stephenson and Jackson (2010); Groll and Ellis (2014)) but empirically we know little how lobbying firms select clients and how firms charge prices on their services. By presenting how much lobbying firms charge for providing political access and how they charge differentially depending the types of clients, we provide a rich understanding of the role of lobbying firms and the mechanism of lobbying industry.

The rest of the paper proceeds as follows. In the next section, we describe the data and present detailed summary statistics. Section 3 presents our analysis on the determinants of lobbying costs. In Section 4, we study the interaction between lobbying firm characteristics and foreign client in the process of selling access and explain the mechanism of price difference in lobbying fee. We conclude in Section 5.

2 Data

The Foreign Agent Registration Act of 1938 (FARA) has provided a legal channel for foreign governments and businesses to lobby the U.S. government policy. These foreign entities must hire an agent based in the U.S., and the hired agent is mandated to submit a semi-annual lobbying disclosure form[1]. Since May 2007 the Justice Department has maintained a website that posts image files of FARA disclosures online, and a joint project of ProPublica and the Sunlight Foundation has digitized these files.[2] We use these digitized files to identify lobbying reports that were submitted in 2008–2010.

Based on these lobbying reports, we extract the following information on each contact record: (i) the name of the contacted individuals, (ii) the date of the contact, (iii) the method by which the individual was contacted (phone call, email, in-person meeting, etc.), and (iv) issues discussed with the contact. If the contact was made to the Congress, we also have information on (i) the level of contact for the congressional contact (whether or not the contact was to the elected officials or his/her staff) and (ii) if the contacted individual was a staffer, the office for whom he/she worked. This detailed information on lobbying contacts is not available in the lobbying reports regarding domestic clients, which are mandated by the Lobbying Disclosure Act of 1995 (LDA).[3]

During the period of study, there are in total 129 foreign countries whose government hired one or more professional U.S. lobbying firms.[4] The lobbying firms hired by these countries reported various activities, from providing legal or media consulting to making contacts in the policy community, such as individuals in the legislative, the executive and the judiciary branches of the federal, state, and local governments, interest groups, academia, and media. The lobbying reports regarding the governments of 85 countries list at least one

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[1]A sample lobbying report can be found in Appendix C.

[2]For more details, refer to `http://foreignlobbying.org`.

[3]The Lobbying Disclosure Act requires lobbyists to disclose the government bodies that they contact, but does not require them to specify any further details of their lobbying contacts.

[4]Some foreign governments, 13 countries, hired their own lobbying staff as their personnel, but did not hire lobbying firms. Because the lobbying activities in such cases often do not involve congressional contacts, we do not include them in our study.

record of having a contact with a member of the 110th and/or the 111th Congresses. As this paper is focused on the access to the members of Congress, we study the lobbying fees charged to and the lobbying contacts on behalf of these 82 countries.

These foreign governments paid their lobbying firms $126.7 million in total during the three years from 2008 to 2010, with the average expenditures being $1.49 million.[5] The government of United Arab Emirates paid its lobbying firms the most, over $12 million, followed by Mexico whose spending exceeded $6.5 million.

There are 121 lobbying firms that represented at least one of the foreign governments studied in this paper during the period. As can be seen in Table 1, 63.6% of them (77 firms) represented domestic clients as well as foreign clients. The yearly revenue from domestic lobbying by these firms is on average $5.3 million, which is much larger than the average revenue by the 2,642 active lobbying firms registered by the LDA during the same period, $0.7 million. Out of 27 domestic lobbying firms that reaped over $10 million per year, 12 of them had at least one foreign government as a client. There are 44 lobbying firms which were registered by the FARA but not by the LDA, but they tend to make smaller yearly revenue and less foreign clients than those which were registered by both acts, as documented in Table 1. All these facts suggest that the conclusions from our study can have general implications on the U.S. lobbying industry.

In this paper, we study how the price of access to the members of Congress is determined. The unit of observation is a lobbying contract between a foreign government and a lobbying firm. In our data, there are 501 such contracts with non-missing lobbying fee. For each lobbying contract, we construct variables that represent the attributes of lobbying contacts and the lobbying firm. We also gather various political and economic information on the foreign countries in our data, including the measure of polity from the Polity IV project, the amount of U.S. aid, the gross domestic product per capita, and the amount of import from

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[5] The total lobbying expenditure by all foreign governments during the same period is $821.5 million. Considering that the total (domestic) lobbying spending reported via the LDA was $10.35 billion during the same period, the size of foreign lobbying is relatively large, especially given the number of participating foreign countries.

Table 1: Lobbying Firms Representing Foreign Governments in 2008–2010

	Domestic & Foreign	Foreign Only
No. Lobbying Firms	77	44
Average Yearly Domestic Revenue ($K)	5,306 (7,787)	-
Average Yearly Foreign Revenue ($K)	531 (672)	350 (516)
Average Yearly No. Foreign Clients	1.72 (1.44)	1.13 (0.51)
Average Yearly No. Contacted Members of Congress[a]	17.30 (24.65)	7.51 (10.92)
Average Years of Experience in 2008[b]	5.93 (9.11)	2.65 (5.45)

Note: Numbers in parentheses are standard deviations. a. We calculate the number of the members of Congress that have any phone or meeting records with a given lobbying firm. b. We measure the years of experience based on the date of registration to the Department of Justice under the FARA.

and export to the U.S.. Table 2 presents the summary statistics of these variables.

3 Determinants of Lobbying Fees

We first investigate the determinants of lobbying fees. Lobbyists provide their clients with political access and represent them to transmit information to and persuade policy-makers. We measure the extent of political access by the number of the members of Congress whom or whose staff were contacted via a phone call or a face-to-face meeting.[6] We allow that lobbying firm characteristics and contact attributes may affect the lobbying fee. Let y_{ijt} denote a lobbying fee that lobbying firm i with firm attributes (X_{it}) charged client j at time t for providing political access ($Access_{ijt}$) with attributes (W_{ijt}). These attributes are summarized in Table 2. The following equation (3.1) represents our lobbying fee model:

$$y_{ijt} = \beta_{0t} + \beta_1 \times Access_{ijt} + \beta_2 \mathbf{X}_i + \beta_3 \mathbf{W}_{ijt} + \varepsilon_{ijt} \tag{3.1}$$

Table 3 presents the regression results. In column (1), the results are based on a model where we control for year fixed effects, and the estimate of the price of an access to an additional member of Congress during a six-month period is $2,792$ with 95% confidence

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[6]Here, we consider that including emails or party encounters that were not eventually followed or preceded by a phone call or meeting may misrepresent the extent of political access.

Table 2: Semi-Annual Lobbying Contracts

Variables	Mean	SD	Min.	Max.
Fee				
Fees paid to a firm ($K)	253.0	318.1	.6	2,619.6
Contacts				
# Contacted members (phone/meeting)	9.95	18.80	1	169
Ratio of direct member contacts	0.38	0.38	0	1
Ratio of House Representatives	0.63	0.35	0	1
Ratio of Democrats	0.61	0.36	0	1
Ratio of leadership or committee chairs	0.23	0.28	0	1
Ratio of economic issue contacts	0.21	0.34	0	1
Ratio of security issue contacts	0.27	0.39	0	1
Firm				
Years since registration under the FARA	10.16	12.11	0	41
Number of foreign government clients	4.40	4.58	1	19
Domestic lobbying revenue share (%)	0.45	0.75	0	2.63
Client				
PolityIV score 2010	4.48	6.45	-10	10
US aid in 2010 ($M)	191.0	468.6	0	3,001.3
GDP in 2010 ($B)	539.6	1,159.4	0.02	5,931
GDP/mid year population in 2010	16,664.8	21,145.7	270	143,151
Import from U.S./GDP in 2010	0.07	0.12	0	0.82
Export to U.S./GDP in 2010	0.06	0.08	0	0.31

Note: The statistics are based on 501 lobbying contracts, except Polity (468), Import/Export (484), and the attributes on lobbying contacts (424). No phone or meeting contacts to the Congress are recorded for 77 contracts in our sample, although there are congressional contacts via emails or other methods. These contracts are included in our study because we consider that the existence of these contacts indicate an interest in or intent of making contacts to the Congress.

interval $[1,221,4,362]$. Controlling for firm attributes including the years of experience in the lobbying market since the registration in the FARA (Experience) and contact attributes such as the ratio of direct member contacts, we find that the estimate of the price of political access is within the aforementioned confidence interval. It is notable that firm and contact attributes do not have a significant correlation with lobbying fee.

Now we consider that lobbying fees may vary with clients for the same lobbying service. To study this claim, we include client characteristics ($\mathbf{Z}_j$) in equation (3.1):

$$y_{ijt} = \beta_0 + \beta_1 \times Access_{ijt} + \beta_2\mathbf{X}_i + \beta_3\mathbf{W}_{ijt} + \beta_4\mathbf{Z}_j + \beta_5 \times Access_{ijt} \times \mathbf{Z}_j + \varepsilon_{ijt}. \quad (3.2)$$

Table 3: Lobbying Fee Regression I

	(1)	**(2)**	**(3)**
Access	2,791.5***	2,819.1***	3,020.8***
	(799.4)	(802.0)	(822.7)
Experience		302.6	916.6
		(2,084.7)	(2,152.6)
Other Firm Attributes	No	Yes	Yes
Contact Attributes	No	No	Yes
Year Fixed Effects	Yes	Yes	Yes
R^2	0.0246	0.0274	0.0387
N	501	501	501

Note: Standard errors in parentheses. ** and *** indicate significance at the 95% and 99% levels of confidence.

We use the variables of client attributes as described in Table 2. Based on the polity score in 2010 from Polity IV Project, we construct a binary variable, Democracy, which takes value 1 if the score is greater than or equal to 7. The score spans from -10 to 10, and the countries with polity score 7 include Bolivia, Colombia, Honduras, and Turkey. We present the estimation results in Table 4.

Table 4 shows the estimates of the parameters of equation (3.2) under various specifications, to which the results are very robust. The price of an access to an additional member of Congress during a six-month period is estimated to be within a 95% confidence interval $[2, 408, 8, 556]$, based on the specification of column (5).

A most striking result is that the foreign governments that have relatively close ties to the U.S. government are charged much less by lobbying firms than other foreign governments. In particular, the governments of the countries with a polity score greater than or equal to 7 pay less for lobbying services than other governments by $137,987 on average, which is about 54% of the average lobbying fee in the data. We represent this trend in Figure 1. Furthermore, trade patterns between a client government's country and the U.S. are also significantly related to lobbying fee. One percentage point increase in the ratio of the imports from the U.S. and a foreign country's GDP is associated with a decrease of $379,532 in the

Table 4: Lobbying Fee Regression II

|	**(1)**	**(2)**	**(3)**	**(4)**	**(5)**
Access	6,810***	4,892***	5,152***	5,227***	5,481***
	(1,452)	(1,547)	(1,542.3)	(1,550)	(1,564)
Access × Democracy	-5346***	-2,513	-2,581	-2,649	-2,622
	(1,620)	(1,799)	(1,791)	(1,800)	(1,810)
Democracy	-111,718***	-113,266***	-139,036***	-136,649***	-137,987***
	(31,414)	(32,064)	(35,919)	(36,426)	(37,809)
Import from U.S./GDP(%)			-380,159***	-381,223***	-379,532***
			(137,733)	(138,767)	(139,944)
Export to U.S./GDP(%)			812,241***	815,766***	831,675***
			(203,127)	(204,175)	(208,082)
Other Country Attributes	No	No	Yes	Yes	Yes
Firm Attributes	No	Yes	No	Yes	Yes
Contact Attributes	No	No	No	No	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes	Yes
R^2	0.0693	0.0718	0.1176	0.1187	0.1255
N	501	501	484	484	484

Note: standard errors in parentheses. ** and *** indicate significance at the 95% and 99% levels of confidence.

lobbying fee to her government. On the other hand, one percentage point increase in the ratio of the exports to the U.S. and the GDP is associated with an increase of $831,675 in the lobbying fee.

We find that when providing their clients with political access, certain lobbying firms may enhance the value or quality of the access. In Table 5, we present the estimates of four regression models of lobbying fee, in all of which we allow that a lobbying firm's years of experience may affect the marginal price of access, as well as the fixed price.[7] Based on the estimates in column (4), one additional year of experience in the lobbying industry leads to an increase of $3,451 in the marginal access price.

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[7]We have also performed a similar set of exercises where we measure the quality by the market share of a lobbying firm. The results are similar.

Figure 1: Lobbying Fee and Access by Foreign Country's Polity
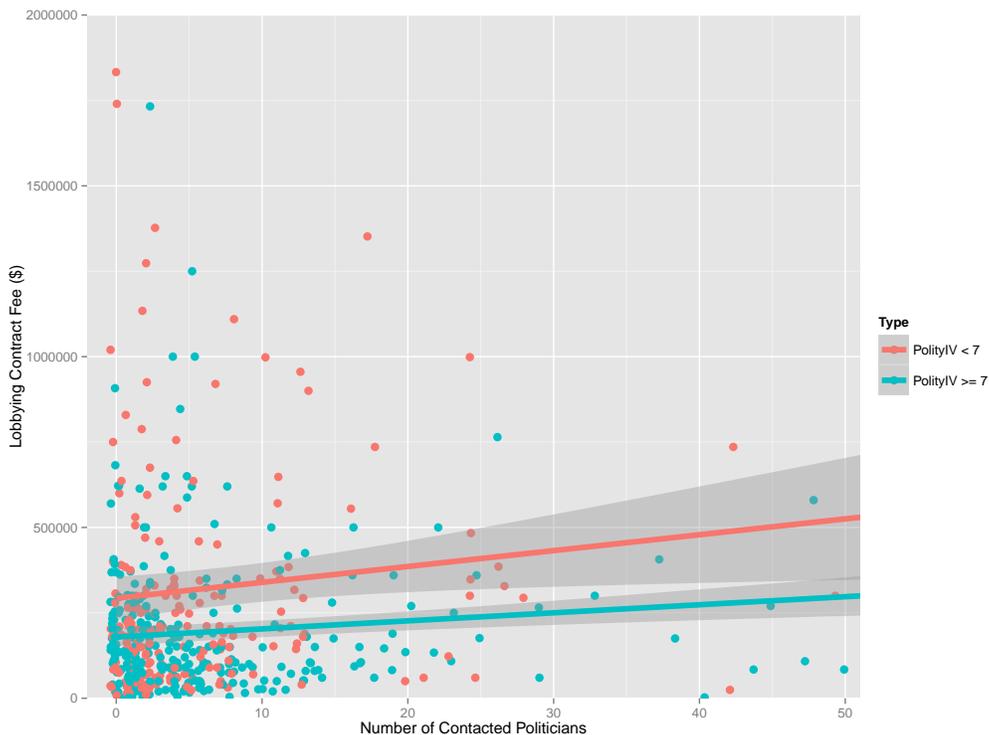
4 Why Do Lobbying Fees Vary with Clients?

We have documented that the lobbying fees vary with clients or foreign governments. There are three possible explanations on these observed price differences. We study the relevance of each explanation to the data, and argue that the reputation of politicians may play an important role in the pricing of lobbying fees.

4.1 Price Discrimination

Price discrimination may explain the systematic price differences as observed in the data (Pratt, Wise, and Zeckhauser (1979); Katz (1984); Borenstein (1985); Holmes (1989)). The willingness to pay for political access may vary; in particular, a foreign government that has a rocky relationship with the U.S. government may value an opportunity to be connected to a legislator more than another foreign government that has already built a set of strong allies in the U.S. government.

Table 5: Lobbying Fee Regression III

	(1)	**(2)**	**(3)**	**(4)**
Access	6,411***	4,926***	4,921***	5,179***
	(1,469)	(1,541)	(1,554)	(1,566)
Democracy	-108,213***	-132,829***	-131,946***	-134,353***
	(32,085)	(35,932)	(36,406)	(37,735)
Access × Democracy	-6156***	-3,453 *	-3,449*	-3,459*
	(1,662)	(1,836)	(1,842)	(1,853)
Access × Experience	3,808**	3,279**	3,317*	3,451**
	(1,746))	(1,626)	(1,732)	(1,743)
Other Country Attributes	No	Yes	Yes	Yes
Other Firm Attributes	Yes	No	Yes	Yes
Contact Attributes	No	No	No	Yes
Year Fixed Effects	Yes	Yes	Yes	Yes
R^2	0.0574	0.1252	0.1255	0.1187
N	501	484	484	484

Note: standard errors in parentheses. *, **, and *** indicate significance at the 90%, 95% and 99% levels of confidence.

Note that for price discrimination to be a viable strategy to a lobbying firm, it must wield some market power. However, based on the distribution of the market shares of the firms in the lobbying industry, we find that the market for access is very competitive. Given that many lobbying firms lobby for both domestic and foreign clients, the market for access is not necessarily segmented by the nationality of clients: foreign and domestic.[8] For this reason, we look at the lobbying revenues as reported under the LDA as well as the FARA. The collective market share in terms of lobbying revenues by the top four lobbying firms in 2010 is 7.85% for the whole market and 21.26% for the sub-market for foreign clients, as can be seen in Table 6. The largest market share in the lobbying industry in 2010 is 2.79% by Patton Boggs, which served both domestic and foreign clients. The top lobbying firm in the same year among foreign clients, as reported under the FARA, is DLA Piper US, with 5.86%

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[8]Out of 174 active lobbying firms that had at least one foreign client in 2010, 64 firms had at least one domestic client during the same year. We also find that there is a positive relationship between lobbying revenues from domestic and foreign clients, as can be seen in Figure 2.

market share in the lobbying on behalf of foreign clients. Therefore, we claim that price discrimination may not be a convincing reason why we observe different prices of access by clients.

Table 6: Lobbying Industry in 2008–2010: Market Share

| | All Clients | | | Foreign Clients | | |
	2008	2009	2010	2008	2009	2010
C_1	2.82	2.77	2.79	9.95	6.38	5.86
C_4	8.56	7.81	7.85	28.52	18.53	21.26
Herfindahl	52.37	50.64	51.51	333.78	217	218.8
# of firms	2,003	2,137	2,041	153	176	174

Note: C_1 (C_4) is the fraction of lobbying revenues in the largest (largest four) firms. The Herfindahl index is the sum of the squared market shares (expressed as percentages). We provide these statistics for the whole lobbying industry (as reported in both the FARA and the LDA)and a segment of the industry with foreign clients (as reported in the FARA).

Figure 2: Lobbying Revenues from Domestic and Foreign Clients
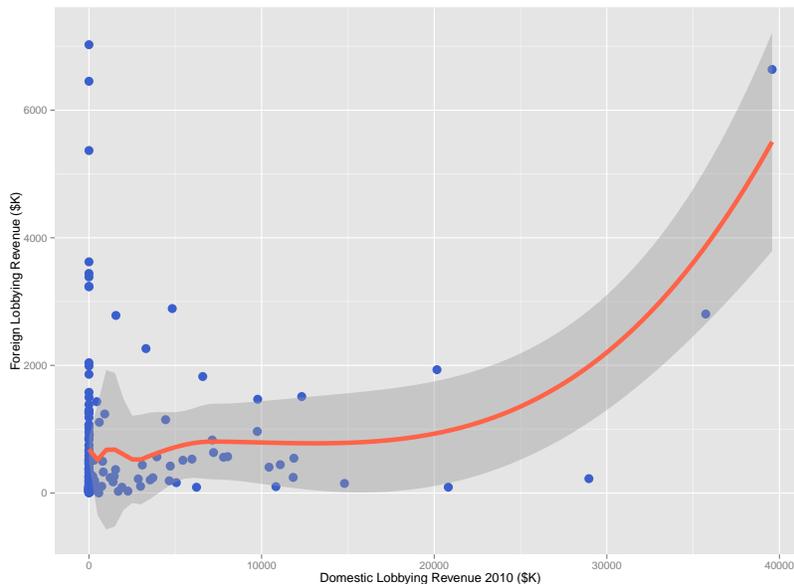
4.2   Lobbying Fee as a Signal

The literature on endogenous lobbying cost provides a more compelling explanation why certain foreign governments are willing to pay more for lobbying services (Potters and Winden

(1992); Austen-Smith (1995); Lohmann (1995); Grossman and Helpman (2001)). More costly forms of lobbying can be persuasive based on their content, but they may gain additional credibility from the fact that a foreign government was willing to bear an avoidable expense in order to make its case. Put it differently, costly lobbying can serve to signal the foreign government's unverifiable information to politicians, who in turn discern the state of the world by observing the foreign government's lobbying cost.

The potential lack of credibility of information provided by a foreign government is due to the fact that its ultimate policy goal may be different from that of a politician, i.e. the politician suspects or assumes a certain extent of "bias" of the foreign governments. If the extent of bias is positively correlated with how democratic a foreign country is, we can expect that on average, a democratic country's government pays less for lobbying than the counterpart of an autonomous country.

4.3   Different Access Costs

Alternatively, price differences may reflect differential costs in providing services (Lott and Roberts (1991); Borenstein and Rose (1994)). In particular, we focus on the cost of obtaining access to politicians on behalf of a foreign government. Many studies on the relationship between lobbying and campaign contribution assume that special interest groups provide political contributions in an effort to gain access to politicians (Truman, 1955; Milbrath, 1963; Bauer, de Sola Pool, and Dexter, 1963; Herndon, 1982; Berry, 1984; Langbein, 1986; Hall and Wayman, 1990; Milyo, Primo, and Groseclose, 2000; Ansolabehere, Jr., and Tripathi, 2002; Wright, 1989, 1990; Hojnacki and Kimball, 2001). To study access costs, we collect data on campaign contributions by lobbying firms based on the FARA filings. [9]

One caution is that the contributions by lobbyists are not necessarily on behalf of their foreign clients. To tightly link access and campaign contributions, we use the date of contact

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[9]The FARA requires the lobbyists or the lobbying firms hired by a foreign entity report their campaign contributions to politicians. Note that foreign entities are not allowed to make a political donations, but they hire lobbyists who can and do make campaign contributions to politicians.

with a politician by a lobbyist to represent its client and the date of campaign contribution made by that lobbyist or his/her lobbying firm to the politician. Here, if a contribution was made within a 30-day window of a meeting or a phone call, we refer this contribution as a "timely" contribution.

Out of 7,568 unique contacts, either by a meeting or a phone call, 4.19% are associated with a timely contribution. When such contribution is made, the average amount is \$2,237. We first study how the frequency of contacts that are associated with a timely contribution is related to the polity of a foreign government. Figure 3 shows a U-shaped relationship.

Figure 3: Timely Contribution and Polity of Foreign Governments
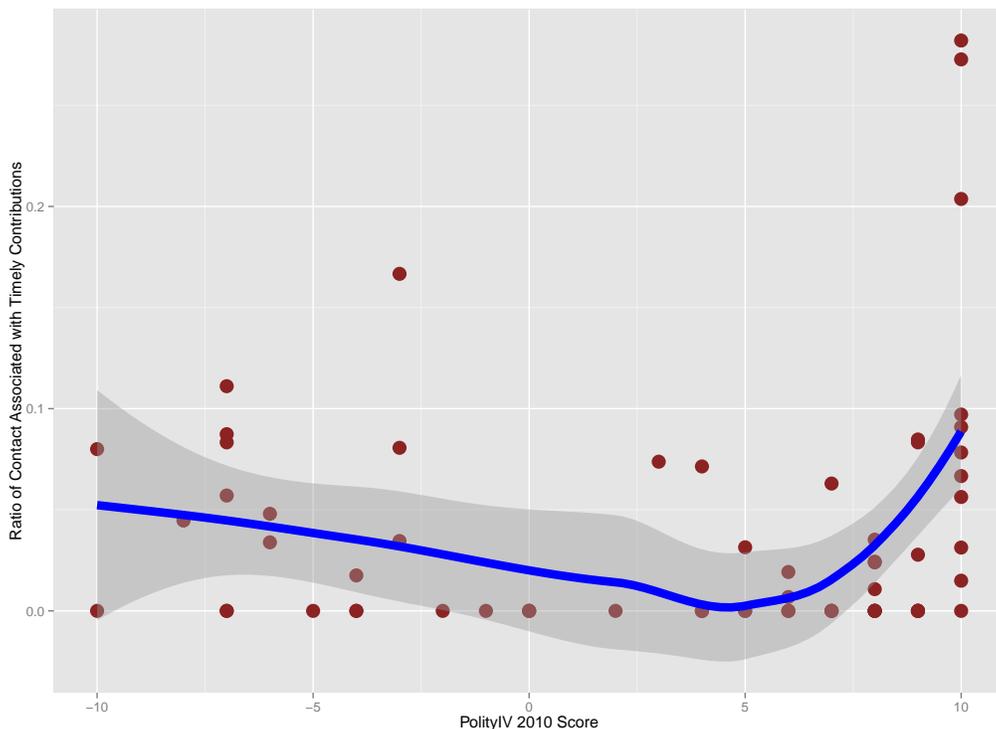
This U-shaped relationship is confirmed in the Probit regression results in Table 7. Columns (1) and (2) are based on a specification where a polity index of a foreign government, which is standardized to take values from zero to one, its squared value, and time fixed effects affect the probability that a contact is associated with a timely contribution. As columns (3) and (4) show, the results are robust to controlling for politician fixed effects and lobbying firm fixed effects.

Table 7: Timely Contributions: Probit Analysis

	(1)	(2)	(3)	(4)	(5)
Standardized Polity	0.03	-2.73***	-3.05***	-2.08***	-2.11***
	(0.07)	(0.48)	(0.73)	(1.10)	(0.51)
(Standardized Polity)^2		2.50***	2.92***	2.03***	1.95***
		(0.43)	(0.68)	(1.03)	(0.46)
Direct Member Contact					0.21***
					(0.07)
Tenure in Congress					0.01***
					(0.003)
Running for a Seat					0.36***
					(0.08)
Vote Share $\leq 55\%$					0.24***
					(0.08)
Firm Market Share					-0.14**
					(0.06)
Politician Fixed Effects	No	No	No	Yes	No
Firm Fixed Effects	No	No	Yes	Yes	No
Year & Quarter Fixed Effects	Yes	Yes	Yes	Yes	Yes
R^2	0.0082	0.0208	0.0736	0.1918	0.0658
N	7,568	7,568	5,417	2,467	7,568

Note: The polity index, which spans from -10 (autocracy) to 10 (democracy), is standardized to have values from 0 to 1. Standard errors in parentheses. **, and *** indicate significance at the 95% and 99% levels of confidence.

Alternatively, we control for various attributes of a contact, in Column (5), and find a few notable trends. First, when a contact is directly with a politician, instead of with his/her staff, it is more likely associated with a timely contribution. Second, the longer the contacted politician has served in the Congress, the more likely a contact with him/her is preceded or followed by a contribution in a short time period. Third, politicians who may value contributions more, such as those running for a seat for an upcoming election or those who expect a hard-fought election, tend to receive a timely contribution. Similar trends can be found when we look at the amount of timely contributions. Table 8 presents the estimates

of a Tobit regression of timely contributions.

Table 8: Timely Contributions: Tobit Analysis

	(1)	(2)	(3)	(4)
Standardized Polity	704	-20,948***	-21,127***	-15,873***
	(571)	(3,498)	(4,735)	(3,518)
(Standardized Polity)^2		19,524***	20,145***	15,001***
		(3,134)	(4,386)	(3,164)
Direct Member Contact				1,014***
				(483)
Tenure in Congress				80***
				(19)
Running for a Seat				2,332***
				(574)
Vote Share $\leq$ 55%				1,321**
				(543)
Firm Market Share				-1,129***
				462
Firm Fixed Effects	No	No	Yes	No
Year & Quarter Fixed Effects	No	Yes	Yes	Yes
R^2	0.0027	0.0076	0.0485	0.0212
N	7,568	7,568	7,568	7,568

Note: The polity index, which spans from -10 (autocracy) to 10 (democracy), is standardized to have values from 0 to 1. Standard errors in parentheses. **, and *** indicate significance at the 95% and 99% levels of confidence.

As discussed in Grossman and Helpman (2001) and Austen-Smith (1995), if a politician knows the extent of a foreign government's bias and he/she can require a contribution equal to the largest amount that the foreign government is willing to pay, the contribution or an access price will decrease in the extent of the bias. The intuition for this result is that a foreign government with preferences that are rather different from those of a politician has relatively little to gain from lobbying, so is willing to pay less for the opportunity. Accordingly, the value of a meeting with such foreign governments is less worth the politician's time.

However, we observe a U-shaped relationship, not an inverse relationship between contri-

butions for access and bias as predicted by Grossman and Helpman (2001). We argue that in addition to time cost of meeting with a foreign government official or his/her lobbyists, politicians may bear another cost of rendering access, which may be increasing in polity differences from the U.S. This cost may be eventually inflicted on lobbying firms that obtain access on behalf of their foreign clients.

An important such cost is related to politician's reputation. There are ample pieces of anecdotal evidence that politicians are attacked by their opponents regarding their potential ties with repressive foreign regimes. For example, Senator Chris Dodd was criticized by his staffer, Amos Houchstein, who had represented the Equatorial Guinea as a lobbyist at Cassidy & Associates.[10] Another more recent example involves Ed Gillespie in the 2014 Virginia Senate race, who had founded a prominent lobbying firm and was questioned on the firm's records of representation of certain foreign clients.[11] These examples illustrate how connection to less democratic countries could harm politician's reputation. Therefore, lobbying firms who represent less democratic countries may need to exert more efforts in collecting and disseminating information when they try to gain access from politicians who may be afraid of electoral risks that such access could impose on.

These two theories make opposite predictions on relationship between bias and access cost. Therefore, they can collectively explain the U-shaped relationship observed in the data.

5   Conclusion

To our knowledge, this is the first empirical study to explore a large dataset of lobbying contacts. We combine this dataset with various complementary datasets from other sources on the attributes of the members of Congress, the foreign countries, and the lobbying firms in the data and on the history of campaign contributions by the lobbyists that represented

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[10]Joshua Kurlantzick, "When Lobbyists Work for Authoritarian Nations," *Newsweek*, July 26, 2010.

[11]Nancy Madsen, "Warner says Gillespie's firm lobbied for brutal dictator," *Richmond Times-Dispatch*, October 24, 2014.

the foreign countries. This rich dataset enables us to thoroughly examine the relationship between money and access.

We find that more democratic countries pay less compared to their less democratic counterparts, holding constant other country and lobbying firm attributes. Given that lobbying market is competitive, we argue that price differentials are driven by the difference cost of lobbying services. Different costs can be borne out by different aspects of lobbying process. As endogenous theory of lobbying explains, distance between the preference between the interest group and the policy maker may explain the different costs in lobbying. At the same time, access cost imposed by politicians can be different by different type of clients. We add reputation costs into the story. Endogenous lobbying theory and the access costs explain the cost differential only in the framework under the information transmission and the utility from then contribution and the scarcity of time from the perspective of politicians. We add another layer of the cost in the lobbying process: reputation concerns.

Different interest groups bring different risk both on the politicians and lobbying firms. Granting access to lobbyists who represent less democratic countries can impose risk on politicians since her opponent can attach that fact during the campaign and meeting representative of foreign countries whose preferences are far from the political means there is no significant informational again. At the same time, representing less democratic countries also impose additional cost on lobbying firms since their reputation, which is the most important asset in the political access market, could be damaged by representing dictators or repressive regimes. The lobbying firms also need to spend extra resources to verify information of their client and they may need to make more campaign contributions when they try to buy access when they represent less democratic counties.

The argument on the reputation cost is consistent with the empirical analysis on the lobbying fee. Also, "timely-contribution" patterns by lobbying firms cannot sole explained by informational story and with reputation concern, the empirical observation is explained.

A promising direction for future research is to exploit the dynamic nature of this data.

One can study the chronological ordering of lobbying contacts and campaign contributions, and explore how it relates to political networks and informational cascades. This analysis may shed light on the flow of information among policy-makers and the way that access is obtained and sustained. Furthermore, by taking a dynamic approach, one can also study how the lobbying strategies evolve or change as a particular issue progresses or regresses in the political process. The other promising direction is to incorporate executive lobbying. Although congressional contact takes the majority of contact strategy in each lobbying report, executive lobbying is also an important aspect of lobbying. It will be a promising research agenda to investigate how much weight is assigned to congressional v.s. excessive contact when lobbying fees are determined and how that varies depending on the types of clients and the issue that foreign clients address.

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Appendix A: Foreign Countries Summary Statistics

Table 9: List of Foreign Countries without Congressional Contacts and their Lobbying Expenditures

Country	K^a	Country	K^a
Australia	4,453.2	Italy	1,197.7
Austria	3,389.9	Jamaica	4,131.6
Bahamas	25,654.6	Kosovo	0.0
Bahrain	123.8	Lebanon	0.0
Barbados	8,541.4	Luxembourg	91.1
Belgium	3,496.5	Monaco	4,528.5
Benin	319.2	Netherlands	4,708.8
Brazil	5,274.9	New Zealand	0.0
British Virgin Islands	2,683.8	Norway	21.1
Burma	0.0	Romania	527.8
Chad	0.0	Rwanda	390
Chile	103.5	Saint Lucia	71.5
Commonwealth of Dominica	0	Saint Vincent and the Grenadines	481.6
Croatia	65.8	Scotland	7,751.7
Curacao	246.6	Sierra Leone	225.3
Czech Republic	720.0	Singapore	12,924.8
Democratic Republic of Congo	0.0	South Africa	3,814.5
Denmark	1,025.0	Spain	465.1
Djibouti	0	Sweden	1,915.1
El Salvador	143.3	Tanzania	912.4
Estonia	296.1	Tibet	1,437.3
Gibraltar	165.0	Tunisia	315.0
Greece	87.1	Ukraine	63.7
Guyana	0.0	Uzbekistan	0.9
Hungary	142.5	Vanuatu	4,353.3
Iceland	3,255.0	West Indies	346.9
Indonesia	21.4	Western Sahara	16.4
Iran	12.0	Zimbabwe	0.0
Israel	16,352.0		

Note: a. Total amount of lobbying expenditures spent by the government entities of the country in 2008–2010 (thousand US dollars).

Table 10: List of Foreign Countries without Congressional Contacts and their Contact Frequencies and Lobbying Expenditures

Country	N1[a]	N2[b]	$K[c]	Country	N1[a]	N2[b]	$K[c]
Afghanistan	49	12	536.8	Macedonia	130	78	472.6
Albania	53	30	1,181.5	Malaysia	36	21	6,472.5
Algeria	137	23	1,259.9	Malta	16	15	88.0
Angola	2	2	2,612.0	Marshall Islands	25	12	23,030.0
Aruba	80	36	778.8	Mauritius	78	31	156.8
Azerbaijan	424	131	2,384.0	Mexico	201	91	13,261.4
Bangladesh	4	4	36.7	Micronesia	16	9	151.9
Belarus	1	1	15.0	Montenegro	6	5	858.5
Bermuda	50	24	14,023.8	Morocco	866	315	10,915.0
Bolivia	12	10	28.1	Nagalim	6	2	126.5
Bosnia and Herzegovina	756	131	9838.8	Nagorno Karabakh Republic	151	124	512.5
Cameroon	18	6	1300.0	Netherlands Antilles	105	39	4,259.6
Canada	169	69	29,786.9	Nicaragua	1	1	537.2
Cayman Islands	14	13	23,284.8	Nigeria	12	8	3,069.9
China	24	11	3,836.8	Pakistan	396	117	5,036.1
Colombia	1	1	534.2	Palau	116	19	664.1
Costa Rica	30	22	1,562.0	Palestine	36	30	3,592.5
Cote d'Ivoire	22	9	932.3	Panama	139	66	4,576.3
Cyprus	367	102	4,390.5	Peru	52	12	712.9
Dominican Republic	223	47	1,221.9	Philippines	899	193	4,845.7
Ecuador	17	12	1,532.7	Poland	147	15	2,524.1
Egypt	1255	325	6,300.4	Qatar	23	12	4,442.5
Equatorial Guinea	35	21	6,607.4	Republic of Abkhazia	11	2	405.0
Ethiopia	537	80	3,918.4	Republic of Congo	163	41	8,141.5
Georgia	287	99	3,315.7	Republic of South Ossetia	10	3	432.8
Germany	148	30	3,247.9	Russia	3	2	7,384.4
Ghana	31	11	750.0	Saudi Arabia	35	18	9,031.3
Guernsey	24	8	1,911.7	Serbia	71	46	4,804.5
Haiti	123	31	442.4	Somalia	1	1	36.1
Honduras	9	2	141.7	South Korea	1338	318	79,108.7
Hong Kong	88	71	18,372.7	Southern Sudan	1	1	472.0
India	263	88	13,374.9	Sri Lanka	15	12	819.2
Iraq	366	137	12,574.9	States of Jersey	22	8	1,238.1
Ireland	35	12	40,396.0	Switzerland	1	1	7,346.2
Isle of Man	16	11	1,548.2	Taiwan	980	242	9,652.3
Japan	125	50	50,327.6	Thailand	22	15	3,401.4
Jordan	7	6	1,414.1	Trinidad and Tobago	60	26	5,240.0
Kazakhstan	74	47	2,736.8	Turkey	3071	445	12,933.7
Kenya	177	65	1,529.5	Uganda	38	14	723.5
Kuwait	9	4	6,805.8	United Arab Emirates	1431	286	46,415.5
Lesotho	112	23	800.0	United Kingdom	155	77	25,905.0
Liberia	178	41	90,381.8	Venezuela	33	20	1,805.1
Libya	368	175	9,011.1	Vietnam	24	12	110.2
Liechtenstein	114	37	1,521.2				

Note: a. Total number of Contact, b. Total number of Members Contacted, c. Total amount of lobbying expenditures spent by the government entities of the country during 2008–2010 (thousand US dollars).

Appendix B: Summary Statistics of Lobbying Firms

Lobbying Firm	N1[a]	N2[b]	N3[c]	N4[d]	$K[e]
30 Point Strategies	1	1	1	2	2,102.9
Advanced Practical Solutions, LLC	16	30	0.87	1	1,020.0
AG Consulting, Inc	1	1	0	1	15.0
Ainsley Gill & Associates	26	60	0.84	2	5,050.0
Akin Gump Strauss Hauer & Feld, LLP	220	604	0.69	6	3,772.4
Alston & Bird	66	87	0.16	3	1,358.0
Amani Group	26	38	0.65	3	1,334.8
American Business Development Group	14	15	0.85	1	394.0
Anne Smith Caparso	12	16	0.08	1	33.6
APCO Worldwide	54	88	0.59	4	3,563.0
Arent Fox LLP	22	30	0.63	3	445.7
Asia Associates	25	53	0.64	1	80.0
Avatar Enterprises	1	3	1	1	265.6
Barbour, Griffith & Rogers	135	643	0.45	5	5,405.0
BKSH & Associates	36	118	0.52	4	390.6
Blue Star Strategies, LLC	3	4	1	2	94.2
Brownstein Hyatt Farber Schreck, LLP	20	43	0.1	2	252.0
Bryan Cave LLP	7	8	0.42	1	40.0
C&M Capitolink	3	11	0	1	50.0
C&M International Ltd	1	1	1	1	919.9
Caspian Group LLC	93	363	0.54	1	168.0
Cassidy & Associates	48	72	0.37	4	6,220.2
Cedar Group	1	1	0	1	310.0
Chlopak, Leonard, Schechter & Associates	15	37	0.53	5	3,508.5
Clark & Weinstock	9	11	0.11	2	228.2
CMS Strategies	72	302	0.62	1	300.2
Covington & Burling	101	581	0.5	3	3,535.9
Daniel J Edelman Inc	2	2	0.5	5	6,797.5
Darlene Richeson & Associates	23	37	0.95	1	464.0
David M. Staton	9	16	0.44	1	151.9
Dewey & LeBoeuf	81	240	0.65	3	3,144.3
Dickstein Shapiro	203	856	0.33	2	710.5
DLA Piper US	329	2439	0.54	9	11,881.4
Dutko Worldwide LLC	1	4	1	1	60.0
Farrow, Jeffrey L	10	78	0.5	1	206.8
Fierce, Isakowitz & Blalock	11	53	0.18	2	40.6
Fleishman-Hillard	14	15	0.64	8	9,769.6
Foley Hoag LLP	29	144	0.55	4	1,306.7
Gabriel Co	21	26	0.8	1	1,674.9
Gallagher Group	6	8	0	1	90.0
Gateway Consulting, LLC	1	1	0	1	0.0
Gephardt Group Government Affairs, LLC	156	545	0.89	2	2,481.9

Note: a. Total number of the members that the lobbying firm contacted. b. Total number of the contact records in the data. c. The ratio of Democrats among the members that the lobbying firm contacted. d. Total number of foreign government clients. e. Total amount of the revenues from the foreign government clients during 2008–2010 (in thousand US dollars).

Lobbying Firm	N1[a]	N2[b]	N3[c]	N4[d]	$K[e]
Global Water & Energy Strategy Team	4	9	0.25	1	143.0
Glover Park Group	129	250	0.83	4	2,539.7
Grace Collins	2	6	0	2	194.3
Greenberg Traurig	19	37	0.78	3	5,639.3
Harbour Group	108	504	0.55	1	9,236.0
Hecht, Spencer & Associates	21	36	0.28	1	870.0
Hills Stern & Morley LLP	1	1	0	1	0.0
Hogan & Hartson	18	67	0.66	4	5,703.4
Independent Diplomat Inc	1	1	1	5	624.9
Integrated Solutions Group	5	14	1	2	0.0
Johnson, Madigan et al	44	67	0.81	2	1,107.7
Jones, Walker et al	31	72	0.51	3	715.2
Jose Pertierra Pertierra & Toro	1	1	1	1	138.5
Ketchum Inc	1	1	0	2	6,502.2
KRL International	41	187	0.75	2	338.9
Lara Alameh LLC	4	5	0.25	1	32.5
LeClairRyan, A Professional Corporation	13	23	0.61	1	321.1
Levick Strategic Communications	3	8	0.33	2	2,126.4
Levine & Co	7	8	0.85	1	978.1
Livingston Group	389	1,491	0.41	7	6,209.5
Locke Lord Strategies	36	63	0.58	1	2.750.1
Loeffler Group	19	33	0.36	4	1.430.3
Manatt, Phelps & Phillips	47	223	0.65	2	1.236.9
Mark Saylor Co	9	32	0.66	4	2,643.9
McGuire Woods Consulting	26	63	0.38	1	708.5
McKenna Long & Aldridge	9	11	0.88	1	583.6
Michael Joseph Fonte	8	11	0.75	1	108.2
MITA Group	37	83	0.32	2	410.0
Native American Rights Fund	4	9	1	1	0
Nazmi Gur	13	19	0.61	1	24.6
Nelson Mullins Riley & Scarborough LLP	8	13	0.5	1	949.2
Neusner Communications	2	5	1	1	164.1
Nurnberger & Associates	24	24	0.79	1	216.0
O'Brien & Associates LLC	2	5	0.5	3	173.8
Ogilvy Public Relations Worldwide	1	1	0	4	2,012.8
Orion Strategies	24	54	0.2	4	744.5
Paige E Reffe	3	4	0.66	1	827.5
Park Strategies	77	401	0.49	1	313.7
Parven Pomper Strategies Inc.	128	514	0.87	3	490.0
Patton Boggs	147	341	0.57	20	15,610.4
Picard Kentz & Rowe LLP	6	7	0.33	1	5,312.9
Pillsbury Winthrop Shaw Pittman	36	46	0.22	3	7,426.0
PLM Group	221	695	0.58	1	3,052.5
Podesta Group, Inc.	93	279	0.76	7	1,860.3
Policy Impact Communications, Inc.	13	22	0.23	1	900.0
Powell Goldstein LLP	11	30	0.54	1	316.6
Private Public Solutions LLC	162	573	0.82	4	2,145.7
Public Private Partnership Inc.	3	5	1	1	216.6
Public Strategies Washington	22	24	0.45	2	457.5

Note: a. Total number of the members that the lobbying firm contacted. b. Total number of the contact records in the data. c. The ratio of Democrats among the members that the lobbying firm contacted. d. Total number of foreign government clients. e. Total amount of the revenues from the foreign government clients during 2008–2010 (in thousand US dollars).

Lobbying Firm	N1[a]	N2[b]	N3[c]	N4[d]	$K[e]
Qorvis Communications	3	3	0.66	9	8,580.2
Quinn Gillespie & Associates	161	851	0.63	4	3,095.8
Rasky Baerlein Strategic Communications	21	32	0.61	2	843.2
Rosemont Associates	13	86	1	1	525.0
Ryberg & Smith	31	78	0.51	1	156.8
Samuels International Associates	2	2	1	2	1,949.3
Sandler, Travis & Rosenberg	2	3	1	1	46.1
Sandler, Travis & Rosenberg, P.A.	13	18	0.53	1	40.0
Scribe Strategies & Advisors	146	146	0.63	1	200.0
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.	1	1	1	1	36.1
Sidley Austin LLP	8	16	0.75	6	1,660.9
Solarz Associates	79	129	0.67	1	172.0
Sonnenschein Nath & Rosenthal LLP	15	16	0.53	1	84.4
Sorini, Samet & Associates	166	495	0.55	6	1,739.7
Squire Sanders Public Advocacy	30	38	0.3	3	80.6
Stuart E. Eizenstat	21	66	0.9	1	1,999.9
The Breaux Lott Leadership Group	5	6	0.2	1	442.5
The Raben Group, LLC	11	25	1	1	90.5
Thomas A Kruse	10	12	0.5	1	28.1
Thomas Capitol Partners, Inc.	169	169	0.63	1	495.0
Tool Shed Group, LLC	10	13	0.7	1	76.0
Trout Cacheris PLLC	2	13	1	1	5,808.9
Van Scoyoc Associates	14	28	0.71	2	495.5
Venable LLP	22	38	0.59	3	527.4
Vision Americas L.L.C.	19	39	0	1	220.0
Washington Group	38	68	0.23	1	346.3
Wexler & Walker Public Policy Associates	24	26	0.91	1	806.2
Whitaker Group	32	203	0.68	4	2,633.0
White & Case	12	62	0.75	7	11,422.6
William B Broydrick	9	13	0.88	1	127.0

Note: a. Total number of the members that the lobbying firm contacted. b. Total number of the contact records in the data. c. The ratio of Democrats among the members that the lobbying firm contacted. d. Total number of foreign government clients. e. Total amount of the revenues from the foreign government clients during 2008–2010 (in thousand US dollars).

Appendix C: An Example of Foreign Lobbying Report

Figure 4: A Lobbying Report Submitted by Fierce, Isakowitz & Balock (Supplement: Contact Information During the Period)

Received by NSD/FARA Registration Unit 05/01/2011 12:20:00 PM

Question 12.

Korea - All contacts were made in advocating for the passage of the US-Korea Free Trade Agreement.

Paul Fassbender, Counsel to Senator Bob Corker
Meetings: 10/5/10
Telephone calls: 11/16/10, 1/18/11, 3/7,11

Jason Edgar, Legislative Director, Congressman Dave Reichert
Meetings: 10/7/10, 11/18/10, 2/2/11, 3/15/11
Telephone calls: 10/6/10, 1025/10, 11/3/10, 12/9/10, 12/14/10, 12/21/10,
1/5/11, 1/12/11, 1/24/11, 1/28/11, 2/7/11, 2/10/11, 2/15/11, 3/1/11, 3/3/11,
3/8/11, 3/14/11, 3/18/11, 3/28/11

Angela Ellard, Chief Trade Counsel, Ways and Means
Meetings: 10/12/10, 1/31/11, 3/8/11
Telephone calls: 10/6/10, 10/25/10, 11/4/10, 11/17/10, 11/30/11, 12/20/10,
1/7/11, 1/12/11, 1/18/11, 1/20/11, 2/11/11, 2/28/11, 3/18/11, 3/30/11

David Ross, trade counsel, Senate Finance Committee
Meetings: 10/12/10
Telephone calls: 10/25/10, 11/15/10

Neil Bradley, policy Director, Congressman Eric Cantor
Meetings: 10/18/10, 10/25/10
Telephone calls: 10/15/10, 10/24/10, 12/13/10, 1/24/11, 2/16/11, 3/24/11

Jon Lieber, Policy Advisor, Senator Mitch McConnell
Meetings: 10/18/10
Telephone: 10/16/10, 11/19/10, 12/20/11, 1/27/11, 2/16/11, 3/24/11

Dori Friedberg, deputy USTR for legislative affairs
Meetings: 10/18/10
Telephone calls: 10/16/10, 11/18/10, 12/1/10, 2/7/11

Barry Jackson, chief of staff, Congressman John Boehner
Meetings: 12/21/10, 2/3/11
Telephones calls: 10/19/10

Chris Campbell, Legislative Director, Senator Orrin Hatch
Meetings: 10/20/10
Telephone calls: 12/10/10, 2/4/11

Figure 5: A Lobbying Report Submitted by Fierce, Isakowitz & Balock (Supplement: Campaign Contribution Information During the Period)

15.c.

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
10/28/10	$2500.00	Cong. David Camp	Washington, DC
10/12/10	$500.00	Cong. Sam JOhnson	Washington, DC
10/12/10	$2500.00	Cong. Eric Cantor	Washington, DC
10/12/10	$2500.00	Cong. John Boehner	Washington, DC
10/28/10	$1000.00	Cong. Pete Sessions	Washington, DC
10/12/10	$2500.00	Cong. Kevin McCarthy	Washington, DC
10/30/10	$500	Sen. John Thune	Washington, DC
10/12/10	$250.00	Cong. Charles Djou	Washington, DC
10/11/10	$250.00	Cory Gardner	Washington, DC
3/18/11	$2500.00	Cong. Kevin McCarthy	Washington,DC
3/18/11	$500.00	Cong. Geoff Davis	Washington, DC
3/8/11	$1000.00	Cong. Dean Heller	Washington, DC
3/18/11	$250.00	Cong. Rick Berg	Washington,DC
3/18/11	$250.00	Cong. Diane Black	Washington, DC
3/18/11	$250.00	Cong. Steve Southerland	Washington, DC
3/18/11	$250.00	Cong Steve Scalise	Washington DC
3/18/11	$250.00	Cong. Tom Reed	Washington, DC
3/19/11	$250.00	Cong. Todd Rokita	Washington DC
3/30/11	$250.00	Cong. Sean Duffy	Washington, DC
1/28/11	$2400.00	Sen. Orrin Hatch	Washington, DC
2/8/11	$1000.00	Sen. Scott Brown	Washington,DC
3/29/11	$1500.00	Sen Scott Brown	Washington DC
2/15/11	$500	Sen. Mark Kirk	Washington, DC