INSTRUCTIONS FOR COMPLETING THE CLIENT SEMI-ANNUAL REPORT SOURCE OF FUNDING DISCLOSURE ONLINE BATCH FILE

Reporting for Source of Funding disclosures is now available to all online filers.

A new option for the reporting of Source of Funding is now available on the Commission's online Lobbying Filing System (http://onlineapps.jcope.ny.gov/LobbyWatch/) as part of the required filing of the Client Semi-Annual Report.

Users can now use a pre-formatted Microsoft Excel file to enter all data related to Source of Funding disclosures (the "batch file"). Only this pre-formatted file will be accepted for use. If a different file is uploaded, the system will automatically reject the submission.

Below are instructions for the completion and uploading of this new Source of Funding Disclosure Online Batch File.

*NOTE: You must complete all required information for **each** contribution in **each** row.*

When completing the form, please note the following:

Source ID Column

Each source of funding is given an "ID" number when completing this filing. After determining the Source ID for a particular source (using the explanations below), all contributions from that source should have the same source ID in the filing.

There are three types of sources – **single**, **multiple**, and **affiliated**.

A **single source** is a source where an individual or entity makes at least one contribution during the reporting period.

*Reminder: You only need to report a **single source** if it makes contributions that exceed $5,000 in the aggregate over the previous 12 months.*

When the Client Filer is disclosing a **single source**, identify each such source with a number, *e.g.*, "1," "2," etc. in the Source ID Column.

A **single source** may make more than one contribution during the reporting period; list each such contribution separately using the same Source ID.

> Example: If ExampleCorp is a **single source** with a Source ID of "1", and contributes $3,000 on February 1, 2014 and another $3,000 on May 1, 2014, two contributions would be reported on the form, both with a Source ID of "1".

A **multiple source** is a source in which more than one individual or entity comprises the source and each individual or entity makes at least one contribution during the reporting period.

*Reminder: You only need to report a **multiple source** if contributions from the entities that make up the **multiple source** exceed $5,000 in the aggregate over the previous 12 months.*

When the Client Filer is disclosing a **multiple source**, identify each entity or individual that is part of the **multiple source** with a Source ID of a number followed by a letter, *e.g.*, "2A," "2B," "2C" in the Source ID Column. Thus, a multiple source comprised of a parent company and a subsidiary company would be listed as "2A" and "2B."

> Example: If ParentCorp contributes $7,000 on February 1, 2014, this source's contribution would be listed as "2A"; if SubsidiaryCorp contributes $7,000 on May 1, 2014, this source's contribution would be listed as "2B." Every contribution from the parent or subsidiary would have a Source ID of "2A" or "2B", respectively.

An **affiliated source** is a source that meets any of the following criteria:

> (1) The Client Filer makes decisions or establishes policy for the corporation, partnership, organization, or entity;
>
> (2) The corporation, partnership, organization, or entity makes decisions or establishes policy for the Client Filer;
>
> (3) The Client Filer has the authority to hire, appoint, discipline, discharge, demote, remove, or otherwise influence other persons who make decisions or establish policies for the corporation, partnership, organization, or entity;
>
> (4) The corporation, partnership, organization, or entity has the authority to hire, appoint, discipline, discharge, demote, remove, or otherwise influence other persons who make decisions or establish policies for the Client Filer; or
>
> (5) The Client Filer and the corporation, partnership, organization, or entity, share a majority of directors on their governing boards, or share a majority of executive management, or maintain banks accounts with shared signatories.

*Reminder: You only need to report an **affiliated source** if its contributions exceed $5,000 in the aggregate over the previous 12 months. When reporting an **affiliated source**, you must also report either: (1) the name, address and principal place of business of at least one natural person (such as an officer, director, partner or proprietor) who shares or exercises discretion or control over the activities of the corporation, partnership, organization, or entity; or (2) the sources of the funds contributed by the corporation, partnership, organization, or entity to the Client Filer. See 19 NYCRR Part 938.3(e)(iii).*

Similar to reporting a **multiple source**, when the Client Filer is disclosing an **affiliated source**, identify the entity making the contribution to the Client Filer with a number followed by a letter, *e.g.*, "3A". The accompanying person (who exercises the requisite control) or accompanying sources of funding to the original contributor would have a source ID of "3B", "3C", and so forth.

> Example (*affiliated source – controlling person identified*): If ExampleCorp, LLC meets the definition of an **affiliated source**, and contributes $7,000 to the Client Filer on February 1, 2014, all contributions by ExampleCorp, LLC would have a Source ID of "3A"; if John Q. Public exercises control over ExampleCorp, LLC, his Source ID would be "3B".
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> > *Note: When reporting a controlling person, the contribution amount for this controlling person is zero (0). See **Amount of Contribution Column** below.*
>
> Example (*affiliated source – underlying sources of funding disclosed*): If ExampleCorp, LLC meets the definition of an **affiliated source**, and contributes $7,000 to the Client Filer on February 1, 2014, all contributions by ExampleCorp, LLC would have a Source ID of "4A"; if not disclosing a person who exercises control over ExampleCorp, LLC (like John Q. Public in the example above), the entities that provide funding to ExampleCorp, LLC should be listed with a Source ID of "4B", "4C", "4D", and so on. *Note: when reporting such underlying sources the contribution amounts for these underlying sources should be zero (0).*

Type of Source Column

Choose from the pull-down window in each cell to identify the type of source being disclosed (**Single**, **Multiple**, or **Affiliated**).

Source Name (Entity) Column

If the source is an entity (not an individual), include the full corporate name of the entity. Please spell out terms such as "corporation" or "association" where the term is part of the entity's name. If there are multiple sources, identify the relationship between the entities (such as affiliate, parent, or subsidiary) in this Column.

> *Skip this column if the source is an individual.*

Source Last Name (Person) Column

Identify the last name of the source if they are a person.

> *Skip this column if the source is an entity.*

Source First Name (Person) Column

Identify the first name of the source if they are a person.

> *Skip this column if the source is an entity.*

Address Column

Insert the street address of the source.

Where the contributor has a non-U.S. address and/or phone number, enter the entire address and phone number here and enter "N/A" in the City, State, ZIP Code, and Phone Columns.

City Column

Insert the city where the source is located.

State Column

Insert the official United States Postal Service two letter abbreviation of the State where the source is located.

ZIP Code Column

Insert the five-digit ZIP Code where the source is located.

Phone Column

Insert the 10-digit telephone number for the source. Do not include dashes or other punctuation.

Date of Contribution Column

Insert the date of each contribution from each source. The correct format is XX/XX/XXXX.

Reminder: each contribution from the same source should be listed separately.

Amount of Contribution Column

Insert the dollar amount of each contribution from each source, denominated in U.S. dollars. Use numerals only, without any currency symbols.

Reminder: Each contribution from the same source is listed separately.

*Reminder: When disclosing **affiliated sources**, the amount of contribution for the "controlling person" or "underlying sources" is zero (0). See **Type of Source Column**, above.*

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SAVING AND UPLOADING THE SOURCE OF FUNDING DISCLOSURE ONLINE SPREADSHEET

Saving the Spreadsheet

When you have completed entry of all data related to Source of Funding disclosures on the pre-formatted Excel file, "save" the document as either an Excel Workbook (.xlsx) or a Comma Separated Values ("CSV") file (comma delimited).

You should save a copy of the original document for future reference, in case you need to amend your filing at a later date. Should you amend your document, it is recommended you save the amended version under a *different* file name.

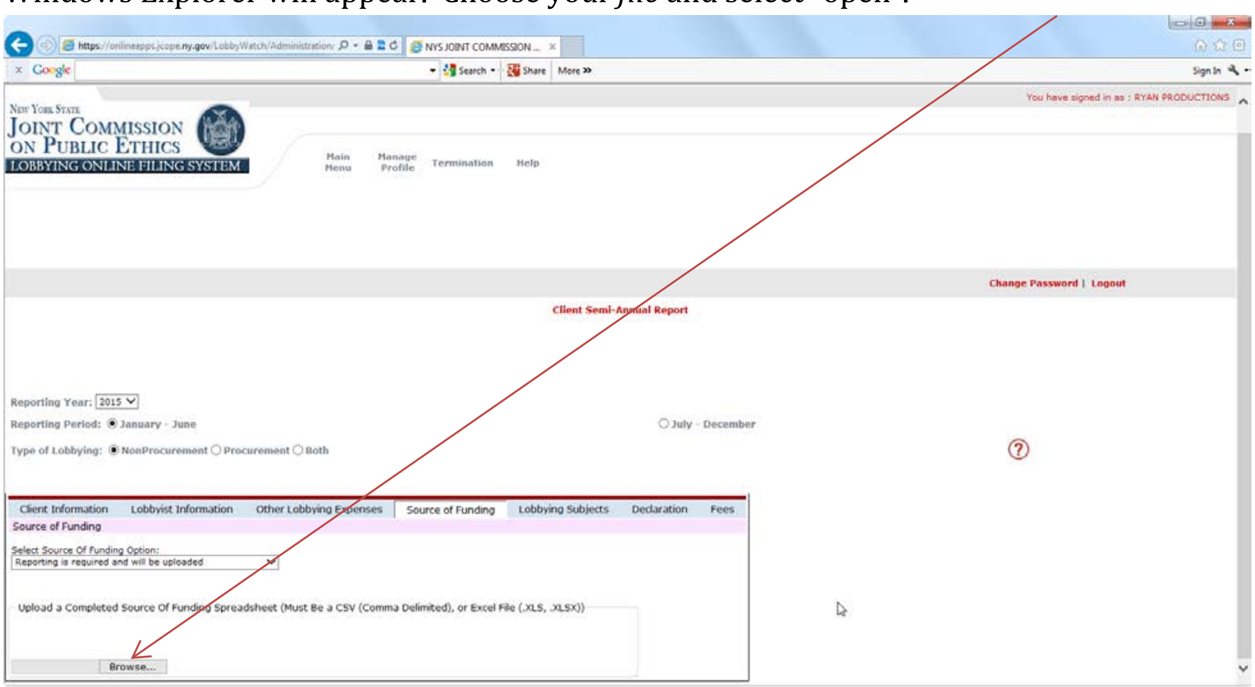
Completing the Source of Funding Section of the Client Semi-Annual Report via the Online Filing System:

You must select one of the available options for "Source of Funding" provided on the Client Semi-Annual Report:

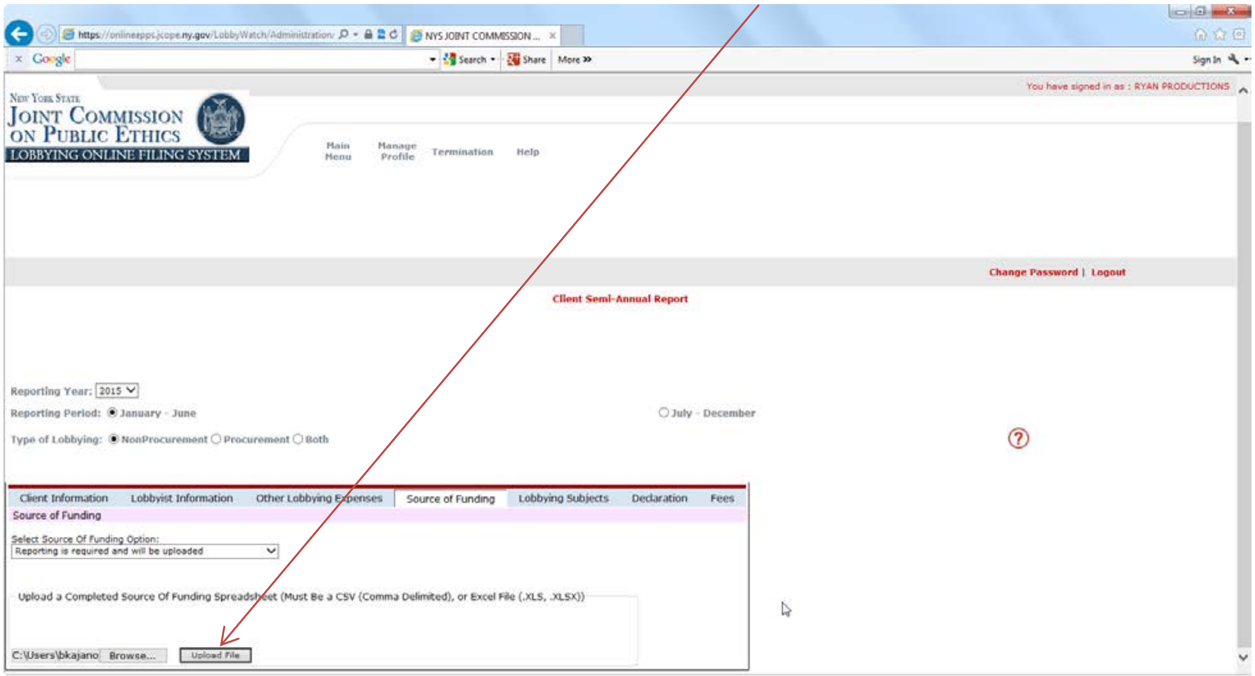
- Reporting is required and will be uploaded (if selected, please follow the upload instructions);
- Reporting is required and filed on paper;
- Exemption pending or previously approved;
- Reporting is not required – under spending threshold;
- Reporting is not required, no applicable Contributions; or
- Reporting is not required – filer is exempt as 501(c)(3) or governmental organization.

Uploading the Spreadsheet:

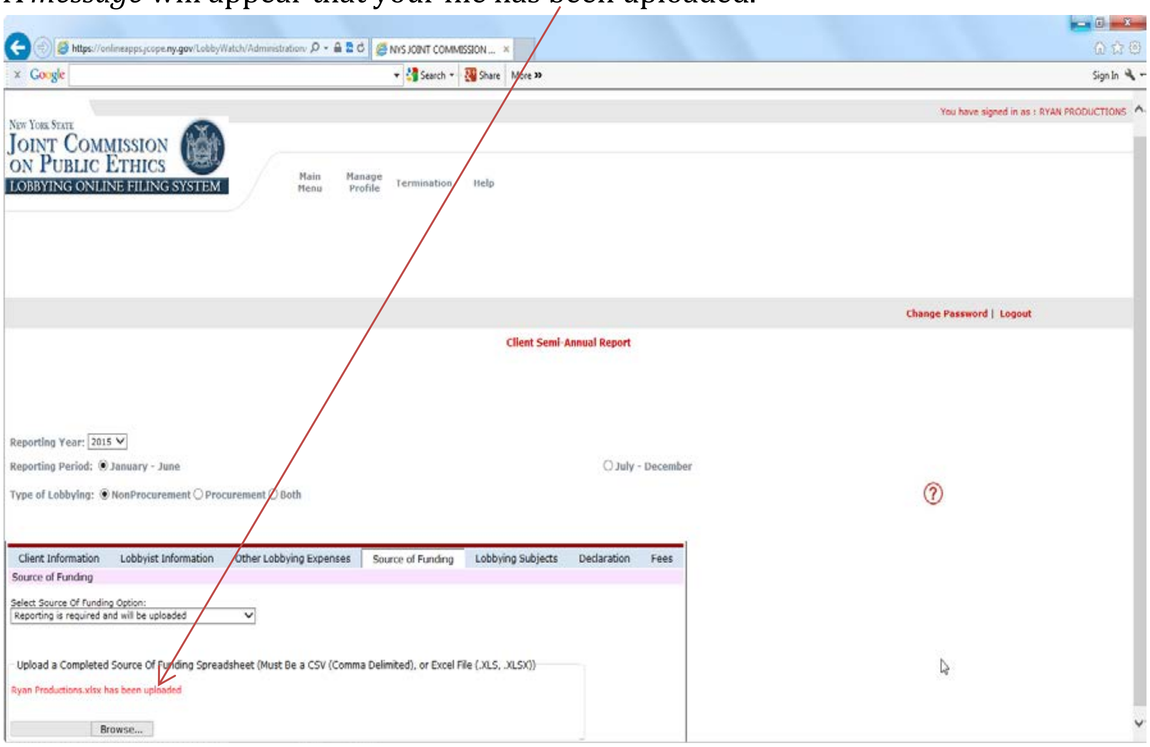
1. When first option is selected, the following screen will appear. Select "Browse" and Windows Explorer will appear. Choose your *file* and select "open".



2. The *name* of the file you selected should now appear in conjunction with the *Upload File Button*. Select “Upload File”.



3. A *message* will appear that your file has been uploaded.



Once the document has been uploaded, the user must complete the remainder of the Client Semi-Annual Report form, including payment option, and then submit. After the Client Semi-Annual Report has been submitted, a message will appear notifying the Client Filer that the form was successfully submitted and the Source of Funding Disclosure Online Spreadsheet was uploaded.

Please be aware – If the batch option was selected, your Client Semi-Annual Report will **not** appear in the client main menu *until the Source of Funding Disclosure Online Spreadsheet has been electronically reviewed for processing*.

Users will receive an e-mail notifying them if the Source of Funding spreadsheet was acceptable for processing, or if errors were found.

If the Source of Funding Disclosure Online Spreadsheet cannot be processed, the user will receive a system-generated e-mail which describes the error(s) that must be resolved prior to resubmitting the Client Semi-Annual Report.

The rejected SOF spreadsheets have previously displayed in the client *Saved Form* tab, however, it will now display in the *Main Menu* view. The user can re-upload the revised spreadsheet by clicking on the *Re-Submit SOF* link. This will go directly to the portion on the form where the revised spreadsheet can be uploaded.

> *When the resubmitted Source of Funding Disclosure Online Spreadsheet is accepted by the system, the initial submission date will be considered to be the actual submission date.*
>
> *Example: The Client Filer submits the report on January 15, 2015, but the Source of Funding Disclosure Online Spreadsheet was not acceptable for processing. The Client Filer corrects the Form and re-submits it on January 18, 2015. The filing is considered to be submitted on January 15, 2015.*

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For more information, please see the SoF Training Materials or contact JCOPE at jcope@jcope.ny.gov or 518-408-3976.