

Office of the Ethics Commissioner of Alberta



Annual Report for the period of April 1, 2014 to March 31, 2015

November 23, 2015

Hon. Robert Wanner
Speaker of the Legislative Assembly
325 Legislature Building
Edmonton, Alberta
T5K 2B6

Dear Mr. Speaker:

It is my privilege to submit to you the Annual Report of the Office of the Ethics Commissioner, covering the period from April 1, 2014 to March 31, 2015. I assumed my role as the Ethics Commissioner of Alberta on May 26, 2014.

This report is submitted pursuant to section 46(1) of the Conflicts of Interest Act, Chapter C-23 of the 2000 Revised Statutes of Alberta. The Office is responsible for the administration of both the Conflicts of Interest Act and the Lobbyists Act.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Trussler".

Hon. Marguerite Trussler, Q.C.
Ethics Commissioner of Alberta

Table of Contents

Contents

VISION	5
MANDATE	6
CONFLICTS OF INTEREST ACT	6
LOBBYISTS ACT	7
DISCLOSURE PROCESS	9
REQUESTS FOR ADVICE	10
REQUESTS FOR INVESTIGATIONS	13
REQUESTS FOR INFORMATION	14
BUDGET AND FISCAL UPDATE	14
EVENTS AND CONFERENCES	15
PUBLICATIONS	15
<i>LOBBYISTS ACT AND REGISTRY UPDATE</i>	16



I am pleased to submit the annual report for the office of the Ethics Commissioner for 2014-15.

I was Ethics Commissioner for 10 months of the reporting period.

During that time we drafted and implemented new disclosure forms which can now be submitted electronically. The process for public disclosure has been changed so that public disclosure now can be found on the Office of the Ethics Commissioner's website and occurs as soon as the annual disclosures meetings of Members take place. We have also redrafted our information brochures and created a brochure to be given to all candidates who file nomination papers.

Last October and November, this office worked closely with the Ministry of Justice on amendments to the Conflicts of Interest Act, the Public Service Act and the Lobbyists Act. The legislative changes resulted in the inclusion of over 50 political staff who now have to file financial disclosure and direct associates reports, and attend an annual meeting. They are also subject to 12 months post employment restrictions. In addition, Deputy Ministers and other Designated Office Holders now have restrictions on holdings, post employment restrictions and are required to file direct associate reports. The gift section of the Act relating to Members was clarified although more work is needed on it.

As well as an increase in the number of people reporting to the office, there has been a substantial increase in requests for advice. However, the response time for advice has markedly decreased.

Administratively we undertook a full server migration so that we now have shared services with other legislative offices with resulting cost savings. We reorganized our filing area and library. We also implemented a new website.

There were four investigations during the year arising out of incidents during the by-elections in the autumn of 2014.

We engaged a new lobbyist registrar, Ms. Lana Robins, at the end of the reporting period. One of our goals for 2014-15 is to do a complete review of the Lobbyists Registry. In addition, we are tightening procedures, enforcing timelines, and removing expired registrations from the registry.

We also look forward to working with the Select Special Ethics and Accountability Committee in conducting a review of the Conflicts of Interest Act, the Public Service Act and codes of conduct for Deputy Ministers and political staff.

VISION

Albertans should have confidence and trust in the integrity of their public institutions.

MISSION

Foster and encourage ethical conduct through education, public disclosures, provision of advice and investigations.

VALUES

Our values:

- Confidentiality
- Impartiality
- Integrity

PRINCIPLES

- Fostering integrity in a respectful and supportive environment.
- Guiding public officials to reflect the values of our legislation in their every day decision-making.
- Serving the Legislature, Designated Office Holders, Political Staff and the public in a non-partisan manner with impartiality and independence.
- Providing confidential service that is responsive, innovative, dependable and helpful.

MANDATE

The *Conflicts of Interest Act* was passed in 1991, Chapter C.22.1 (now Revised Statutes of Alberta, Chapter C-23), and created the Office of the Ethics Commissioner of Alberta. The Office is also responsible for the administration of the *Lobbyists Act*, Statutes of Alberta 2007, Chapter L-20.5 (“*Lobbyists Act*”). The Ethics Commissioner is an Officer of the Legislature and is appointed by Order-in-Council following passage of a motion in the Legislative Assembly approving the appointment.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker on annual reports, investigation reports and matters relating to the Commissioner’s jurisdiction or authority, excluding administrative matters. The Ethics Commissioner presents budgetary estimates through the Standing Committee on Legislative Offices. The Legislative Assembly approves the budget for the Office of the Ethics Commissioner.

CONFLICTS OF INTEREST ACT

The preamble of the *Conflicts of Interest Act* describes its basic principles as follows:

- Ethical conduct of elected officials is expected in democracies;
- Members of the Legislative Assembly serve Albertans most effectively if they come from a broad spectrum of occupations and continue to participate actively in the community;
- Members of the Legislative Assembly are expected to perform their duties of office and arrange their private affairs in a manner which promotes public confidence and trust in the integrity of each Member, maintains the Assembly’s dignity and justifies the respect in which society holds the Assembly and its Members; and
- Members of the Legislative Assembly, in reconciling their duties of office and their private interests, are expected to act with integrity and impartiality.
- Ministers and their staff must avoid conduct that violates public trust or creates an appearance of impropriety.

Through the *Conflicts of Interest Act*, the Ethics Commissioner:

- promotes understanding of the Members’, Designated Office Holders and political staff obligations under the *Act*;
- receives financial disclosure statements from all 87 MLAs, all Designated Office Holders as defined in the Public Service Act, and senior political staff in the Premier’s and Ministers’ offices;
- provides advice to MLAs and former Members under the *Act*, either on an individual basis or generally to all or groups of MLAs (including former Members) and to current or former political staff and designated office holders;
- provides advice to individuals governed by post-employment restrictions; and
- investigates alleged breaches of the Conflicts of Interest Act by a Member, Designated Office Holder or political staff member.

Upon receiving a report from the Ethics Commissioner, the Speaker is required to release the report publicly. If the Legislature is in session, the report is tabled in the Legislature. If the Legislature is not in session, the report is released publicly and tabled when the Legislature next sits. If the Ethics Commissioner recommends a sanction in an investigation report, the Legislative Assembly debates and votes on the investigation report within 15 days after the report is tabled, or at such other time determined by a resolution of the Legislative Assembly.

Under section 29 of the *Act*, the Legislative Assembly may accept or reject the findings of the Ethics Commissioner or substitute its own findings. If the Legislative Assembly determines there is a breach, it may impose the sanction recommended by the Ethics Commissioner, any other sanction referred to in section 27(2) which it considers appropriate, or the Legislative Assembly may refrain from imposing a sanction. The Legislative Assembly has final authority about disciplinary matters relating to its Members.

LOBBYISTS ACT

The *Lobbyists Act* is intended to enhance the integrity and accountability of government by fostering openness and transparency about who is influencing decisions made by public office holders. The *Lobbyists Act* establishes two categories of lobbyists: consultant lobbyists and organization lobbyists. The *Lobbyists Act* prohibits a person from lobbying a government department and providing paid advice to another government department on the same subject matter at the same time, unless an exemption is granted.

The *Lobbyists Act* preamble describes its basic principles:

- free and open access to government is an important matter of public interest;
- lobbying public office holders is a legitimate activity;
- the public and public office holders should know who is engaged in lobbying activities;
- a registration system of paid lobbyists should not impede free and open access to government; and
- the public and public office holders should know who is contracting with the Government of Alberta and provincial entities.

The requirement to register as a lobbyist only comes into effect once a lobbyist performs over 100 hours of lobbying. However, some lobbyists register before they reach the threshold.

The Office of the Ethics Commissioner maintains a web-based Lobbyists Registry system and database. It is searchable by the general public. The Registry provides openness and transparency by:

- recording the identities and activities of people paid to influence decisions made by public office holders;
- recording the identities of organizations and clients who pay lobbyists to influence the activities of public office holders on their behalf;
- allowing lobbyists to register, update, renew and terminate their own registrations on the system; and
- allowing public scrutiny.

The registry allows access 24 hours per day, seven days per week, for both the public and lobbyists.

The Ethics Commissioner may authorize any individual in the Office of the Ethics Commissioner to act as Registrar and to perform any of the powers, duties or functions of the Registrar under the *Lobbyists Act*. The Ethics Commissioner delegated the administrative and enforcement responsibilities of the Registrar to Lana Robins.

Under the *Lobbyists Act*, certain powers and responsibilities are reserved for the Ethics Commissioner and cannot be delegated, including:

- exemptions from the contracting prohibition (ie. allowing a person to provide paid advice to government while at the same time lobbying the government), with or without conditions;
- issuing Advisory Opinions and Interpretation Bulletins; and
- banning serious offenders from lobbying.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker on investigations under the *Lobbyists Act*. If the House is sitting, the report is tabled. If the House is not sitting, the report is distributed to MLAs after which the Ethics Commissioner may make the report public. A report provided when the House is not sitting is tabled when the House next sits.

DISCLOSURE PROCESS

This year, all MLAs, Designated Office Holders, and political staff complied with their obligation to file disclosure statements, although several had to be reminded about the deadline for submitting disclosures.

Disclosure statements include information about:

- the Member, Designated Office Holder, or political staff, their spouse or adult interdependent partner and minor children. It requires disclosing all assets, liabilities and financial interests of any private corporation in their control;
- any legal proceedings brought against them;
- taxes owing; and
- ownership of publicly-traded securities.

The Ethics Commissioner received private disclosures from 87 Members and met with each Member personally to discuss their disclosure. Previously, MLA public disclosure statements were released through the Office of the Clerk of the Legislative Assembly. However, as a result of the changes to the *Conflicts of Interest Act* in December 2014, public disclosure statements are now posted on the Office of the Ethics Commissioner website shortly after the Member’s meeting with the Ethics Commissioner.

Designated Office Holders are required to submit disclosure statements under the Public Service Act. Disclosure meetings were conducted with all Designated Office Holders. When reviewing disclosures by Designated Office Holders of agencies, boards and commissions, compliance with their internal conflict of interest policies, where possible or appropriate, were considered. There are no public disclosure statements for Designated Office Holders.

Certain senior political staff (eg. Press Secretaries, Chief’s of Staff, Special Advisors) are also required to provide financial disclosure to the Office of the Ethics Commissioner as a result of the changes to the scope of the Act in December 2014. Disclosures of all such political staff commenced in August 2015. There are no public disclosure statements for political staff.

Disclosure Statement Compliance

Category of Filer	Compliance
Members of the Legislative Assembly	100%
Senior Officials	100%

REQUESTS FOR ADVICE

If Members, Designated Office Holders, or political staff seek and follow advice from the Ethics Commissioner they are protected from investigations under the *Conflicts of Interest Act*, or a prosecution for a breach of the *Conflicts of Interest Act*. Advice is given in writing.

A confidential and searchable database of all requests and both verbal and written advice is maintained by the Office of the Ethics Commissioner for future reference to ensure consistent responses under similar circumstances to similar requests for advice. This database is only accessible by staff working in the Office of the Ethics Commissioner.

Some interesting facts pertaining to requests for advice are:

- The number of requests from 2013/14 to 2014/15 increased by 32%.
- Response time to advice requests has substantially decreased. Requests are usually handled in 24 hours.
- 75% of advice requests continue to fall into one of four main categories: gifts, post-employment, family and outside activities.

Total Requests for Advice under Conflicts of Interest Act



Breakdown of Requests for Advice

Types of Advice	2011/12	2012/13	2013/14	2014/15
Gifts	25	58	80	110
Post Employment	38	37	36	95
Outside Activities	23	27	26	19
Investments	19	17	22	13
Family	5	15	10	18
Constituency Issues	5	12	20	8
Codes of Conduct	14	12	3	5
Contracts with the Crown	4	9	10	9
Taking Part in Decisions	1	9	4	6
Conflicts of Interest/Other	n/a	n/a	9	27
Reviewing SO Appointments	n/a	n/a	14	10
Total	147	204	242	320

Gifts

Questions are raised about accepting tickets to sports events, invitations to fundraisers, invitations to conferences and non-commercial flights. Members are required to track all gifts, including event tickets, to ensure they have accurate records for yearly disclosure and are mindful of both the value of cumulative gifts they receive from one source in a calendar year and any connection between a source and the Member's public responsibilities.

Post-Employment

Post-employment questions come from departing Ministers, Designated Office Holders and political staff.

Outside Activities

Questions regarding outside activities almost exclusively deal with volunteer board activities in community organizations and clarification on external business activities.

Investments

Investment requests relate to blind trusts and personal investments of the Member or their family. Where potential conflicts existed, appropriate steps were taken by the parties to remove themselves from the situation prior to a conflict arising.

Family

Questions involving family members relate to either the employment or activities of a spouse or child.

Constituency Issues

Questions relate to assisting constituents, using the constituency allowance for social obligations within the constituency. Where questions about the Member's constituency allowance fall more within the mandate of the Office of the Speaker, the Member is referred to Legislative Assembly office.

Codes of Conduct

Several agencies, boards and commissions, sought informal confidential advice on conflict of interest matters relating to their agency's code of conduct.

Contracts

Contract questions are often raised by new Members about their dealings with Alberta Treasury Branch Financial or other Crown contracts.

Taking Part in Decisions

Generally, Members consider their personal holdings and those of close family members and ask whether it is appropriate to participate in a decision before the Legislative Assembly or one of its committees, or before Executive Council or one of its committees. Our Office advises whether a private interest is involved or whether the matter is a general application which affects the Member only as a broad class of the public, thereby allowing the Member to participate and vote.

Conflicts of Interest/Other

This is a new general category where requests for advice do not fall within the other categories but does fall within the general scope of the Conflicts of Interest Act.

Reviewing Senior Official (SO) Appointments

Sometimes, as part of the screening and hiring process, potential conflicts of interest issues arise with certain candidates for certain senior government positions. In these cases, or in cases where it is prudent to ensure there are no underlying conflict of interest issues, the Ethics Commissioner may review selected candidate's backgrounds and investment holdings to ensure there are no issues and provide related advice.

REQUESTS FOR INVESTIGATIONS

The majority of requests for investigation involved matters that are outside the jurisdiction of the office.

Request for Investigations by Category (Total: 26)



Below is a summary of the investigations completed in 2014/15.

Requests were received from a number of parties all for an investigation into the conduct of the Honourable Premier Jim Prentice, Cabinet Ministers Stephen Mandel and Gordon Dirks, and MLA candidate Mike Ellis during a byelection in 2014. The allegations primarily pertained to public policy announcements made during the byelection period and whether the actions of the Members involved in these announcements furthered their “private interests” as defined under the Conflicts of Interest Act.

The Conflicts of Interest Act only applies to Members of the Legislative Assembly, and Ministers. As the Premier, and Ministers Dirks and Mandel, were all members of Cabinet during the byelection they were covered by the Conflicts of Interest Act. However, the complaint against Member Ellis was dismissed because, at the time of the incidents, he was not a Member of the Legislative Assembly.

The Ethics Commissioner concluded that none of the policy announcements or actions during the byelection by the Premier and Ministers were forbidden under the Conflicts of Interest Act. However, in the specific case of Minister Gordon Dirks, while his actions did not specifically contravene the *Conflicts of Interest Act*, his actions created an unfortunate perception of a conflict of interest.

The full investigation reports that were tabled in the Legislative Assembly on these matters can be found at: <http://www.ethicscommissioner.ab.ca/publications/investigation-reports/commissioner-trussler/>

REQUESTS FOR INFORMATION

The Office of the Ethics Commissioner received 23 requests for information this year. The majority of requests were from callers seeking clarification about the Ethics Commissioner's mandate and the relevant legislation. Information requested concerned employment standards, professional standards and conduct, MLA compensation, post-employment, blind trusts, gift acceptance, public disclosure, conduct in non-profit organizations and legislation surrounding investigations. Callers who could be assisted were referred to the appropriate office.

COMPARATIVE SUMMARY STATISTICS

Total Requests Received for:	2011/12	2012/13	2013/14	2014/15
Advice	147	204	242	320
Investigations	20	11	9	26
Information	95	208	140	23
TOTAL	262	423	391	369

BUDGET AND FISCAL UPDATE

	2013-2014 Expenses	2014-2015 Budget	2014-2015 (actual) Expenses
Salaries	\$602,337	\$638,000	\$642,539
Supplies	\$297,393	\$335,000	\$253,408
Amortization	\$10,389	\$25,000	\$16,677
Total	\$910,119	\$998,000	\$912,624

Last year, the Office of the Ethics Commissioner came in under budget by \$85,376 (approximately 8%).

Full copies of the 2014-2015 audited financial statements are located on the Office of the Ethics Commissioner website: <http://www.ethicscommissioner.ab.ca/publications/annual-reports/>.

EVENTS AND CONFERENCES

Participating in annual conferences is very beneficial to further the work of the office. Conferences provide the Commissioner and staff the opportunity to exchange information with peers on issues of common interest and review legislative and regulatory differences and trends to ensure Alberta is current.

In 2014, the Office of the Ethics Commissioner attended the annual Canadian Conflicts of Interest Network conference, the international Council of Governmental Ethics Laws (COGEL) conference and the Lobbyist Registrars Conference. Due to the current economic environment the office is not attending the international COGEL conference in Boston, MA this year, and is reducing overall conference attendance.

PUBLICATIONS

A routine review of brochures and guides is undertaken each year to ensure they are current. Educational information is reviewed to ensure it is as user-friendly as possible. All brochures were reviewed following the amendments made to the *Conflicts of Interest Act*, and Public Service Act, in December of 2014.

The following brochures are available at www.ethicscommissioner.ab.ca

- Conflicts of Interest
- Background and Role
- Quick Guide to Determining a “Private Interest”
- Disclosure Statements
- Gift Acceptance and Disclosure
- Investigations / Inquiries
- Members of Executive Council
- Post-employment regulation
- Post-employment Obligations for Former Political Staff Members
- Candidates Seeking Federal Election
- Officers of the Legislature
- Ethics (school presentation)
- Candidates Seeking Election Provincial Election

Under the Lobbyists Act:

- Am I a Lobbyist?
- Are You a Lobbyist?
- What is Lobbying?
- Contracting Prohibitions

LOBBYISTS ACT AND REGISTRY UPDATE

For the period of time covered by this annual report, Mr. Bradley V. Odsen, Q.C., was the Lobbyist Registrar until January 2015, and Mr. Kent Ziegler, Chief Administrative Officer for the Office of the Ethics Commissioner, was the Acting Registrar until Lana Robins assumed the role of Lobbyist Registrar on April 7, 2015.

LEGISLATIVE CHANGES IMPACTING LOBBYING IN ALBERTA (APRIL 1, 2014 – MARCH 31, 2015)

Changes to Alberta Lobbyists Act

The *Alberta Accountability Act*, which received Royal Assent on December 18, 2014, contained important amendments to the *Lobbyists Act* that all lobbyists should ensure they are aware of:

Contracting Prohibition (Dual role no longer permitted): Section 6 of the *Lobbyists Act* has been amended to restrict a person's ability to simultaneously lobby and hold a contract for paid advice with the government. Previously, a *person* (which, as defined in the *Interpretation Act*, includes individuals and corporations) was permitted to carry on the dual role of lobbying and holding a contract for providing paid advice to the Government, provided that the two were not with regard to the same subject matter. Now, an individual or corporation who lobbies must not enter into a contract for providing paid advice to the Government or a prescribed Provincial entity; and an individual or corporation who holds a contract to provide paid advice to the Government or a prescribed Provincial entity must not lobby. The subject matter is no longer relevant; individuals and corporations are not permitted to both lobby and provide advice to government, and must choose to do one or the other.

However, an individual or corporation is still permitted to lobby if another *person associated with them* (as defined in s.1 (5) of the *Lobbyists Act*) holds a contract for providing paid advice, or to enter into such a contract if a person associated with that person lobbies, provided that the lobbying and the contract are with respect to different subject matters.

The term "person" in s. 6 does not include partnerships. Therefore, although a member or employee of a partnership must choose to either hold a contract to provide paid advice to the government or lobby (as they cannot do both), another member or employee of that partnership may either provide paid advice to the government or lobby as long as the advice and lobbying contracts for the two members or employees of the partnership are not on the same subject matter.

Provisions relating to former public officer holders: The definition of "former public office holder" has been widened with regard to completing a consultant lobbyist return or an organization lobbyist return, and now includes a wider range of individuals, including former members of the Executive Council, the Premier's staff, or Ministers' staff; former designated office holders; any individual who formerly occupied a prescribed position with a prescribed Provincial entity; and former assistant deputy ministers or those who occupied a senior executive position in a department.

Greater detail concerning the employment history of former public office holders is also now required, and former public office holders are also now only required to state that they are a former public office holder if they held public office within the last 2 years.

Changes to Conflicts of Interest Act

The *Alberta Accountability Act* also resulted in certain changes being made to the *Conflicts of Interest Act* which impact a former public official's ability to lobby: former Ministers, and former members of the Premier's and Minister's staff, are now restricted from lobbying for a period of 12 months from the last day their position, or appointment, was held.

OUTREACH

As had been noted in previous Annual Reports, after reaching a pinnacle in 2009-2010, there has been a slow but steady decline in the demand for presentations and the opportunities to offer presentations. This continuing decline in educational outreach reflects the fact that the majority of those affected by the *Lobbyists Act* are aware of it and its requirements.

REQUESTS FOR INFORMATION

The past year has seen the Registrar continue to review registrations submitted by lobbyists for posting to the Registry, respond to inquiries and address technical issues in a timely and effective manner. We continued to receive requests for information and advice from consultant and organization lobbyists and other interested parties about the obligations and requirements under the *Act*.

Consistent with the trend from previous years, requests have stayed approximately the same from previous years. Communications have concerned:

- new account requests;
- profile change requests;
- procedural issues with regard to notices of change;
- advice with regard to the requirement to register;
- general advice with regard to interpretation of the *Act*;
- terminating registrations of lobbying activities which were concluded;
- advice and assistance on completing a new registration;
- advice and assistance on completing semi-annual renewals;
- requests from the Registrar for additional information;
- communication with users regarding account status; and
- support for technical issues.

Communications about the Act and Registry were conducted via email and by phone, and were consistently effected in a timely manner.

LEGISLATIVE REVIEW

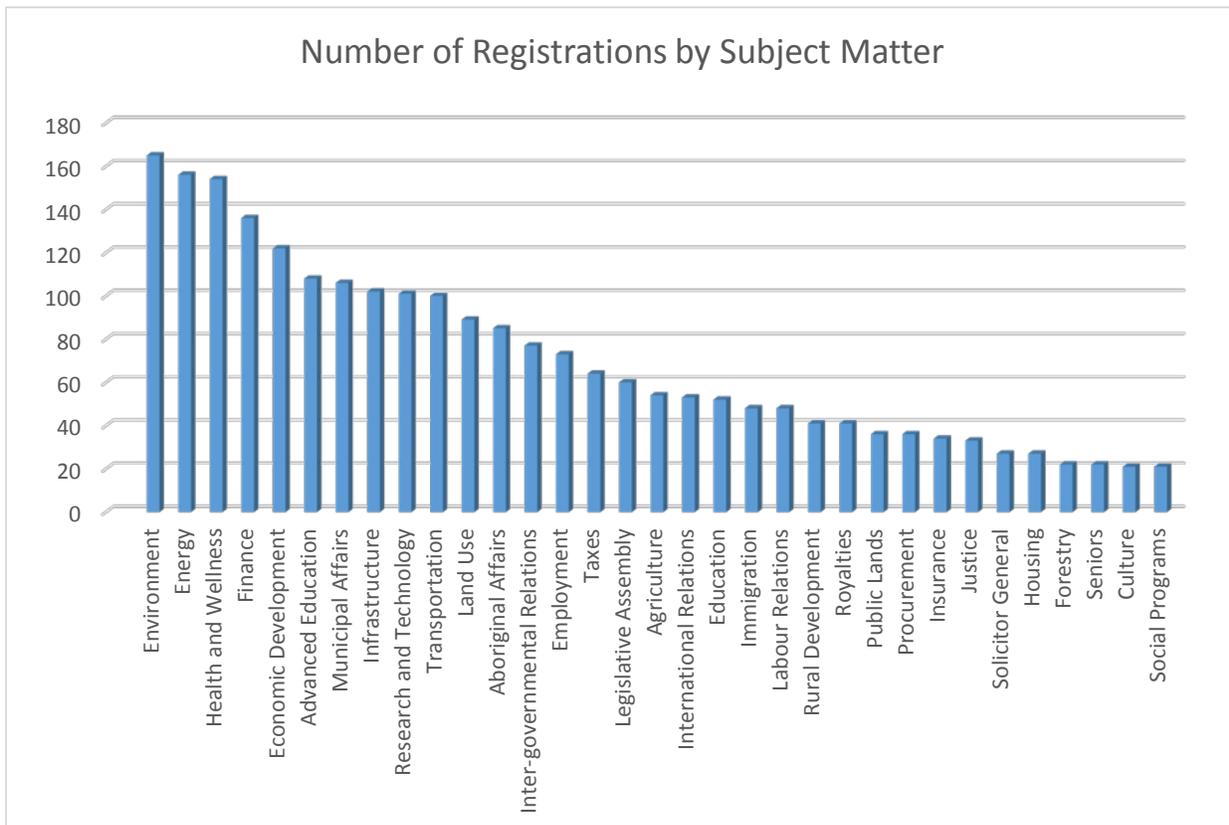
A special committee established by the Legislative Assembly is required to begin the review of the Act in 2016, and submit to the Legislative Assembly, within one year of beginning the review, a report that includes any amendments recommended by the Committee. Our office will be involved in this review process, and we will be making recommendations to the Committee with regard to amendments to the legislation.

STATISTICAL YEAR IN REVIEW

Registered Users as of March 31, 2015

	Consultant Lobbyists	Organization Lobbyists	Total
Registered Users	181	309	490

Registrations by Subject Matter for period from April 1, 2014 – March 31, 2015



Registrations filed from April 1, 2014 - March 31, 2015

	Initial Returns	Notices of Change	Notices of Termination	Semi-annual Renewals
Consultant Lobbyists	45	137	56	N/A
Organization Lobbyists	17	153	5	209

Registry Website Activity from April 1, 2014 – March 31, 2015

	2013/14 Average/month	2014/15 Average/month
Unique Visitors	1458	1059
Number of Visits	3142	2605
Pages Viewed	23,179	24,471
Hits	58,030	52,943

INVESTIGATIONS

Section 15 of the Lobbyists Act sets out when the Registrar shall conduct an investigation and when the Registrar can exercise discretion to decline an investigation. When an allegation and a request for an investigation is received, it must first be determined if the allegation falls within the jurisdiction of the *Lobbyists Act*. If it does, it is then determined if there is evidence to support the allegation included with the request for investigation. If there is some evidence that appears to support the allegation, then an investigation is commenced. If there is no such evidence, the Registrar initiates an administrative inquiry to determine whether there may be sufficient grounds to commence an investigation.

There were no requests for an investigation under the *Lobbyists Act* received in 2014-2015.

LOOKING FORWARD

The Alberta Lobbyists Registry is an online registry system that has been active since September 28, 2009. The system is based on Lotus Notes (now IBM Notes) technology and is in need of update to reduce the number of technical issues encountered. We are currently reviewing the feasibility of replacing the registry system in 2015/16, with the goal of improving ease of use for all users, including lobbyists, the public and our office. We thank the lobbyists for their patience as we continue to work through technical issues encountered with our registry, and work towards improving the registry for all users.

Additional future projects for our office include preparing for the review of the *Lobbyists Act* to commence in 2016 and updating the Alberta Lobbyist Registry website.

Working with lobbyists to assist them in understanding their obligations under the *Act* and the functions and processes of the Registry are key elements in our proactive approach to achieving compliance with the *Act* and reducing the amount of enforcement required. However, the *Lobbyists Act* was enacted six years ago, and is no longer new legislation. Lobbyists should now be well familiar with the legislation and their obligations under the *Act*. In future, we will be placing a greater emphasis on enforcement of the provisions of the *Lobbyists Act*, including the designated time periods to complete required filings and the requirement to register.