

# *Payment and Reimbursement*

## Advisory Bulletin

I am a former deputy minister meeting the premier to discuss my client's proposal to privatize correctional services. Am I lobbying if I am only being reimbursed for my expenses?

You might be.

The definition of payment includes, among other things, the disbursement, distribution, transfer, loan, advance, deposit, gift or other rendering or tendering of money, property, goods or services or anything else of value. It does not include reimbursement for expenses.

If you receive payment and are a consultant lobbyist, you must register.

If you receive payment, and you are an in-house lobbyist, your senior officer must register your activities if you fulfil all criteria.

Someone communicating with a public office holder in an attempt to influence anything found in the definition of lobbying who is only being reimbursed for expenses would not be required to register.

Reasonable reimbursement expenses do not constitute payment.

However, if reimbursement expenses are unreasonably high, the lobbyist registrar might examine them to determine whether or not they, in fact, represent payment. If for example, you lobbied an MLA during an hour-long meeting and your reimbursement of expenses included a one-week stay at a luxury resort in the home riding of the MLA, an investigation by the registrar may find that the reimbursement constitutes a payment.

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