

Campaign Contributions and Access to Congressional Offices: Patterns in Foreign Lobbying Data

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Abstract

Do lobbyists contribute money to legislators to build relationships in government? I show that lobbyists deploy resources strategically to get access to officials by analyzing newly available data on foreign lobbying in the U.S. government from 1998 to 2019, which contain information on lobbyists' campaign contributions and contact with officials. Using supervised machine learning models, I identify lobbyist requests for access to members of Congress and classify them as either successful or unsuccessful. The data show that lobbyists *request* access almost exclusively to legislators to whom they made campaign contributions. Furthermore, lobbyists who contributed money to legislators are more likely to *gain* access to them than lobbyists who did not, but only if the legislators are ideologically similar and in the same party. While the data and research design I employ do not allow me to infer causal influence of contributions on access, these results suggest that lobbyists make contributions to foster an environment conducive to contact with like-minded officials.

Keywords

campaign contributions, access, foreign lobbying

Although access to government officials alone has little intrinsic value to interest groups, it opens the door to influencing officials' much more consequential actions, starting with the drafting and committee markup of legislative bills (Hall and Wayman 1990). Access is a scarce resource; groups looking for access to Congress encounter members who give it rarely and selectively (Hall 1998; Kalla and Broockman 2016; Langbein 1986). Legislators' limited time and staff favor access seekers who have something to give in return. To succeed in their job, legislators need two assets: electoral support (including campaign contributions) and policy-relevant information. They give access disproportionately to those who can supply these assets by relying on a useful heuristic: give access to those who have given campaign contributions before. An obvious reason for such a rule of thumb is that legislators need campaign funds to get reelected (Box-Steffensmeier 1996; Gerber 2004; Jacobson and Carson 2019), and the reward of access helps keep the money flowing. Another reason, however, is that contributions can signal donors' possession of electorally beneficial information (Austen-Smith 1995).

It follows that lobbyists should contribute to legislators whom they wish to contact in the future, a simple strategic prescription that mirrors legislators' rule of giving access to donors. Unfortunately, attempts to get

access to legislators are rarely observed. Consequently, existing research on the relationship between campaign contributions and access-seeking tends to either assume that lobbyists or interest groups want access or, in some way, infer whether they want access based on their innate types and missions (Ansolabehere, Snyder, and Tripathi 2002; Fourniaies and Hall 2014, 2015, 2018; McKay 2018; Powell and Grimmer 2016).¹

In this study, I use novel data on foreign entities' lobbying activity in the United States to examine the link between contributions and access. The Foreign Agent Registration Act of 1938 (FARA) provides a legal channel for foreign governmental and non-governmental entities to lobby the U.S. government through U.S.-based lobbyists. FARA requires lobbyists to disclose to the Department of Justice their contact with U.S. government officials and campaign contributions they make, as well as the officials these activities involve. This requirement, in turn, allows me to collect data to analyze how contributions relate to contact with officials.

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The data contain previously untapped information on both lobbyists' requests for access and the outcomes of these requests. Using supervised machine learning models, I classify foreign agents' requests for access to legislators as successful or unsuccessful based on key words in thousands of foreign lobbying reports from 1998 to 2019. I first show that campaign contributions are very strongly and positively related to requests for access. Conditional on requesting access, I then show that contributions are strongly and positively related to success in getting access to a congressional office. Adding to these main findings, I show that donors have an easier time getting access to legislators themselves rather than their staff, which constitutes a greater commitment of time and attention by legislators. Last, ideology mediates the relationship between contributions and access: The link between the two behaviors is limited to ideological allies. Important to note, the nature of the data and research design I employ does not allow me to infer any causal influence of contributions on lobbyists' ability to get access. The patterns of money and contact that I uncover, however, suggest that lobbyists use campaign contributions to maintain relationships with like-minded legislators.

Campaign Contributions and Access to Legislators

Lobbying is widely construed to as the transfer of information from organized interests to government officials (Austen-Smith 1995; de Figueiredo and Richter 2014; Lohmann 1995). The transfer of information requires lobbyists to contact and get access to officials. But all those who want access to officials do not receive it; the demand for access simply exceeds the supply. Members of Congress regularly decide how much to participate in various activities that demand their attention, including direct communication with the public, and often the decision is to not participate at all (Hall 1998). In the late 1970s, the institution's own Obey Commission found that the average Representative spent just 1.1 percent of his or her workweek meeting with interest group representatives (Langbein 1986). In a recent experiment, congressional staffers gave access to letter writers who requested it less than 30 percent of the time (Kalla and Broockman 2016).

For organized interests, legislators do not give them access randomly or on a first-come, first-serve basis. Instead, who is asking matters greatly; legislators allocate access based on their expectations about the benefits they stand to gain from contact, measured in the two things that the groups can offer—electoral support and policy-making information. Electoral support, in turn, primarily

consists of campaign contributions,² as money is critical for reelection. For vulnerable incumbents, campaign spending can be decisive in securing reelection (Caughy and Sekhon 2011). For secure incumbents, a plentiful “war chest” helps deter high-quality challengers (Box-Steffensmeier 1996). Knowing the importance of money, incumbents naturally hope that some people they meet with will return the favor financially.

Legislators have long needed policymaking information from organized interests such as draft legislation, research support, and strategic planning (Ainsworth 1997; Bauer, Pool, and Dexter 1963). Due to declining legislative capacity in Congress, reliance on outside expertise has increased (LaPira and Thomas 2017). Direct contact with interest groups gives legislators increasingly necessary policy input. As discussed below, campaign contributions can help legislators distinguish helpful input from harmful input.

Legislators' essential calculation for determining whether to give access to an interest group is whether the expected gain in campaign contributions and policy input exceeds the associated cost of legislative resources—including time—and the opportunity cost of not spending those resources doing other work or meeting with others instead. Because the decision to give access involves an educated guess, legislators' *perceptions* of access seekers are key, and only people who gain *mental access* to cognitively constrained legislators can receive substantive representation (Miler 2010). One shortcut can substantially streamline legislators' guesswork regarding access seekers' potential offerings: favor those who have contributed before.

Access can serve as a “positive reinforcement” of sorts for contributing; by rewarding past donors with access, legislators can encourage continued giving. Of course, legislators should not abuse this kind of reward, giving donors token access purely to lure continued contributions while having no inclination to truly value their input or comply with their wishes. The vigilant donor can hold the deceitful legislator accountable by halting the flow of money. Skeptical that interest groups and legislators can reliably forge long-lasting bonds, McCarty and Rothenberg (1996) suggest that organized interests in fact have the upper hand in dealing with legislators amid commitment problems.

The relationship between organized interests and legislators, however, appears largely congenial: Exchanges of interest groups' resources (campaign funds and policy-making information) and legislators' resources (access and votes) occur much more between allies than between adversaries (Hall and Deardorff 2006; Kollman 1997). The hypothetical above of a legislator stringing a donor along to extract contributions is implausible not only

because it will displease the discerning donor, but also because the very decision to contribute signals some minimal level of preference congruence with the legislator.

How much initial congruence a contribution signals is not settled. Denzau and Munger (1986), for example, show that groups target legislators expected to be indifferent on their issues for contributions when shopping for legislative votes. Austen-Smith (1995) shows that when legislators are unsure of groups' policy preferences and, by extension, whether to receive their input, campaign contributions can signal preference alignment. This slight disagreement notwithstanding, this research yields an important insight about why legislators should give access to past donors: This rule helps legislators not just with fundraising, but also to solicit policy-relevant information from electorally helpful—at least harmless—sources.

The Access-Seeking Motive and Lobbyists' Allocation of Resources

Legislators' selective allocation of access leads to a guide for lobbyists: Resource permitting, they should make campaign contributions to legislators whom they anticipate contacting in order to signal electoral and policy support. Crucially, the utility of campaign contributions is better understood as a trust-building device than as a silver bullet for opening the door to legislators; that is, donors should not expect their money to guarantee access to the recipients, and lobbyists with welcome input do not always have to pay an "entrance fee."

Case in point: Lobbyists with previous experience working in government have a leg up over others, particularly for lobbying their former bosses and colleagues (Salisbury et al. 1989; Vidal, Draca, and Fons-Rosen 2012). It would be wrong to attribute their advantage to campaign contributions they might make. Nevertheless, relationships with legislators inherited from working together still need to be maintained (Wise 2007), and for that purpose campaign contributions can only help. This consideration does suggest, however, that campaign contributions to key legislators are imperative for lobbyists without long-held relationships in government.

Lobbyists, or interest group representatives more generally, appear to understand the importance of campaign contributions for relationship maintenance. Existing research documents several contribution patterns which are highly consistent with groups' access-seeking motive. First, because incumbents are much more likely to win elections than non-incumbents, organized interests show a strong preference for them when contributing (Fourinaies and Hall 2014), which gives them a significant fundraising advantage over challengers (Jacobson and Carson 2019; Krasno, Green, and Cowden 1994).

The variation in giving *among* groups reveals a finer connection between the access-seeking motive and the incumbency preference. For example, companies exposed to greater regulatory risks give more to incumbents (Fourinaies and Hall 2015).

Second, organized interests show a strong preference for powerful legislators when allocating contributions. Ansolabehere, Snyder, and Tripathi (2002) report that groups that spend a lot of money lobbying give more to committee chairs, party leaders, and pivotal legislators. Money tracks institutional power over time as well: Legislators attract more interest group contributions upon joining substantive committees or acquiring procedural power (Fourinaies and Hall 2018). Leveraging legislators' involuntary departure from committees ("exile"), Powell and Grimmer (2016) show that business groups decrease contributions to exiled members and direct resources toward new members. Contributions also target congressional committees in charge of policy of interest (e.g., McKay 2018). Third, lobbyists concentrate their contributions quite exclusively on members of their own party, who are more accessible (Koger and Victor 2009).

Research on lobbyist and group contributions thus provides a preponderance of evidence that access to officials is a major purpose of campaign contributions. An important research limitation, however, is that access-seeking behavior is generally unobserved. Scholars have done what they can using available information on types of groups (and lobbyists) on one hand and types of candidates (and legislators) on the other. By showing a variety of ways that groups indeed structure their giving according to how they *ought to* if they want access, studies convincingly connect the two behaviors based on aggregate patterns. When the analysis does link specific donors to specific legislators (Kalla and Broockman 2016; Langbein 1986), the former's desire for access is treated as given. In this paper, I leverage information on access-seeking in foreign lobbying data to overcome this limitation, looking at both lobbyists' requests for access and their results with respect to specific legislators.

Given that many lobbyists and firms are partisan agents (Furnas, Heaney, and LaPira 2019; Koger and Victor 2009), how do lobbyists' partisanship and ideology relate to the exchange of money and access? If groups make contributions as a payment to overcome their preference misalignment with legislators' voter base (Lohmann 1995), money should be most useful for lobbyists who disagree with legislators, since they have the most preference misalignment to overcome. On the other hand, if contributions reduce legislators' uncertainty about lobbyists' preferences (Austen-Smith 1995), they should help allies. I adjudicate this debate descriptively by examining how lobbyist ideology conditions the

relationship between contributions and access. This additional analysis offers a closer look at the overall relationship between the two behaviors.

Foreign Lobbying Data

This study draws on several types of data. The central data this study draws on is FARA reports on lobbyist campaign contributions and access-seeking to members of Congress. Congress passed the Foreign Agents Registration Act in 1938 to monitor propaganda activity by European fascist and communist governments in the United States. During the postwar years, the intent of FARA lost its wartime emphasis on anti-American activity, as Congress replaced “propaganda” with “informational materials” in the statute. Recent controversies related to foreign interference surrounding the 2016 presidential campaign and the Trump presidency gave this usually arcane law renewed attention. Today, international trade is by far the most prevalent issue of interest to registered foreign lobbying clients (Kee, Olarreaga, and Silva 2004; Montes-Rojas 2018), followed by diplomatic and cultural exchange.

Patterns of lobbyist strategy in foreign lobbying such as campaign contributions and access-seeking can yield insights applicable to a domestic context. Despite being hired guns, lobbyists principally drive these behaviors in both domestic and foreign lobbying. For campaign contributions, lobbyists supply the funds personally or through their firm-affiliated Political Action Committees, and individuals are prohibited from contributing money in others’ name. Federal law prohibits foreign nationals from contributing to political campaigns. Foreign organizations’ inability to make campaign contributions may create some pressure to have their lobbyists funnel campaign funds on their behalf, but the criminality of such transactions makes them unlikely on a significant scale.³ Contact with government officials is also lobbyists’ call; foreign entities hire them precisely for their knowledge of officials.

The Department of Justice prepares the FARA data for bulk download online.⁴ The data consist of two parts. The first part is well-formatted spreadsheets listing by year the foreign principals lobbying in the United States, the U.S.-based organizations (“registrants”) that represent these principals, and the individual lobbyists that these registrants contain. As such, these spreadsheets essentially comprise metadata showing the occurrence of foreign lobbying. The second part of the FARA data consists of supplemental FARA reports in which the registrants disclose lobbying activities in the United States, including contact with government officials and campaign contributions. The supplemental reports provide the substance of the data I analyze.

While the earliest report in existence dates back to 1942, the FARA data I collect fall into the time span of 1998 to 2019.⁵ Foreign lobbying steadily proliferated across the world over the decades, and the period selected saw more intense lobbying than the previous years (You 2020). There is, however, no appreciable trend or periodicity in the relationships analyzed that suggests previous years may contain systematically different patterns. As the FARA data are novel and relatively complex, I will first explain the extraction of registrants and lobbyists from the metadata and proceed to classifying access-seeking and campaign contributions disclosed in the reports.

Principals, Registrants, and Lobbyists

Though the foreign entities that lobby in the United States—*principals*—do not play an integral role in this study, they have been central to existing research using FARA data (Kee, Olarreaga, and Silva 2004; Montes-Rojas 2018). In the post-1998 period, the vast majority of the foreign principals in the data tend to be foreign governments or offices directly set up by foreign governments based in the United States to promote their countries’ trade, tourism, or public image. Governments dominate in the contemporary foreign lobbying landscape in large part due to the exodus of business from the data. A precipitous decline took place in the disclosed lobbying activity of foreign businesses around 1998 as they opted to disclose under the domestic Lobbying Disclosure Act (LDA) through their U.S. subsidiaries (You 2020).⁶

Foreign principals pay *registrants* to lobby in the United States, and these can be in-house operations or contracted firms (a foreign principal that lobbies in-house is its own registrant). Foreign governments’ U.S. offices or liaisons often use in-house lobbying, though they can opt for a mix of both in-house and contract lobbying. The data include 981 distinct registrants; of these, 202 were in-house operations and by definition had one client, while the rest were contract lobbying firms. The median contract firm had two foreign clients, with the largest firms representing more than ten.

Whether established in-house by foreign entities or contracted on K Street, registrants are home to individual foreign *agents* (synonymous with *lobbyists*). From 1998 to 2019, the average in-house registrant consisted of 2.8 lobbyists, while the average contract firm consisted of 5.1 lobbyists. A registrant’s makeup of lobbyists can, and often did, change from year to year. When a registrant disclosed campaign contributions and contact with U.S. government officials in FARA reports, it usually did not identify the specific lobbyists who initiated these activities; rather, the

The Registrant met with: Representative Jim McDermott on November 2, 2001; Senator Bill Nelson and Senator John McCain on November 14, 2001; Chairman John Robson of the Export-Import Bank of the United States on November 16, 2001; Peter Watson, President of the Overseas Private Investment Corporation, on November 16, 2001; and Thelma Askey, Director of the U.S. Trade and Development Agency, on November 16, 2001; in each case for the purpose of promoting bilateral investment and trade between the United States and Mongolia. The Registrant also arranged and attended a luncheon for the Prime Minister of Mongolia with Representative Henry Hyde, Representative Tom Lantos, Representative Dana Rohrabacher, Representative Benjamin Gilman and Representative Joe Pitts on November 15, 2001, for the purpose of promoting positive U.S./Mongolia relations.

Figure 1. Reporting of contact with legislators in a FARA report filed by APCO Associates (<https://efile.fara.gov/docs/4561-Supplemental-Statement-20020331-GXALE04.pdf>). FARA = Foreign Agent Registration Act of 1938.

DATE	AMT	CAMPAIGN
1/26/2010	\$1,000.00	McCarthy for Congress
1/5/2010	\$750.00	Great Land PAC
1/5/2010	\$250.00	Great Land PAC
1/5/2010	\$500.00	Ted Deutch for Congress
1/11/2010	\$1,000.00	Martha Coakley
1/12/2010	\$1,000.00	Martha Coakley for Senate
1/12/2010	\$250.00	Coakley for Senate
1/14/2010	\$1,000.00	Martha Coakley for Senate
1/15/2010	\$5,000.00	AGSHF PAC
1/19/2010	\$1,200.00	Allyson Schwartz for Congress (in-kind)
1/19/2010	\$750.00	Joe Wilson for Congress
1/19/2010	\$1,000.00	Mike Thompson for Congress
1/19/2010	\$15,000.00	NRCC
1/19/2010	\$750.00	Pete Stark Re-Election Committee
1/19/2010	\$500.00	Richard Burr for Senate (in-kind)
1/26/2010	\$2,500.00	Majority Committee
2/1/2010	\$5,000.00	Blue Dog PAC
2/1/2010	\$1,000.00	Gwen Moore for Congress

Figure 3. Excerpt of a FARA report on lobbyist campaign contributions. Filed by Akin Gump Strauss Hauer Feld, LLP (<https://efile.fara.gov/docs/3492-Supplemental-Statement-20100722-14.pdf>). FARA = Foreign Agent Registration Act of 1938.

2/12/2019	Email	Senator Dan Sullivan	Avery Fogels and Liz Banicki	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator David Perdue	Gabriele Forsyth and Caitlin Poling	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Kevin Cramer	Rachel Blouning and Jason Stevrek	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Martha McSally	Kate Chaudoin	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Rick Scott	Scheduler	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Marsha Blackburn	Grace Bureh and Sean Farrell	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Josh Hawley	Ellen James and Eric Teetsel	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Ranking Member Jack Reed	Rosanne Haroian and John Nebrega	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Jeanne Shaheen	Megan Darcy and Naz Durakoglu	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Kirsten Gillibrand	Kinsey Spars and Moran Hanai	Meeting Request for KRG Foreign Minister
2/12/2019	Email	Senator Richard Blumenthal	Dana Sandman and Kim Quarentello	Meeting Request for KRG Foreign Minister

Figure 2. Requests for access to congressional offices in a FARA report filed by “Kurdistan Regional Government—Liaison Office—USA” (<https://efile.fara.gov/docs/5783-Supplemental-Statement-20190728-25.pdf>). FARA = Foreign Agent Registration Act of 1938.

registrant’s team of lobbyists acts as a collective, of which registrants comprising a single lobbyist in charge constitute a special case. Accordingly, in analysis I impute contributions and access-seeking to the relevant registrant as teams of one or more lobbyists.

Classifying Lobbyist Access-Seeking and Contributions

The metadata tells us which registrants conducted lobbying activities on behalf of foreign entities and which lobbyists carried them out, while the content of 5,357 “supplemental reports” tells what these activities were. For illustration, in Figure 1, a firm details its contact with members of Congress. In Figure 2, an in-house registrant lists its contact with congressional staffers (fourth column) and these staffers’ member affiliation (third column). In Figure 3, a firm lists its recent campaign contributions.

With text obtained from FARA reports in hand, I extract records of contributions and access-seeking from registrants to members of Congress. Access-seeking to

legislators is easy to discern for a reader but harder to systematically identify across thousands of reports. Registrants adopted patently different reporting conventions and formats, which demands a flexible and robust approach to classify access. My response is a machine-learning strategy.

I first extract all mentions of congressional incumbents from the FARA reports, along with the immediate context surrounding them (150 characters on both sides). This step produced over 70,000 records. For those records that pertain to access-seeking, I then determine whether the language indicates that the registrant has successfully obtained access at the time of reporting. Verbal clues are critical. In the first example above (Figure 1), the phrase “met with” strongly indicates successful attempts to gain access. In Figure 2, the phrase “meeting requests” suggests that, at the time of reporting, the lobbyists requested but did not achieve access to the legislators of interest. Subsequent reports by the same organization (not shown) would then reveal whether these requests were fulfilled or went unanswered.

To reliably and efficiently extract requests for and success in gaining access from these records, I build two machine learning models—one for determining whether each legislator mention pertains to access-seeking requests and one for determining their results—with a training set of manually coded legislator mentions. I gave two undergraduate research assistants the same 2,000 randomly selected legislator mentions along with context and manually identified instances of access-seeking and their results. I cross-tabulated their determinations against one another, found the intercoder reliability to be 91.2 percent, and reconciled the disagreements. I randomly select 75 percent of the (reconciled) manual entries to form a training set to build the two machine learning models based on the Random

Forest algorithm. Combined, the models classify legislator mentions as describing no request for access, an unfulfilled request at the time of reporting, or a fulfilled one. Upon validating these models on the remaining 25 percent of manually coded entries by comparing model predictions with manual classifications (a perfect model reproduces 100 percent of the manual coding), I find both models to perform well, as indicated by two well-accepted metrics—precision (put simply, the fewer false positives, the better) and recall (the fewer false negatives, the better). Each model approaches or exceeds 90 percent on both counts.⁷

Another type of information on lobbyist contact that I collect from FARA report language is whether records of contact involve members of Congress themselves or their staff. I do so by detecting whether the context of legislator mentions includes any congressional staff titles such as Chief of Staff, Legislative Assistant, and so on.⁸ It is possible for disclosure of contact to contain both a legislator and a staff member. As it turns out, this practice describes about 5 percent of records of transpired contact. Fortunately, these instances are easily identifiable, as they are marked by the phrase “accompanied by” linking legislators and staffers. By detecting the coexistence of a staff title, a legislator’s name, and the word stem “accompan-” in the same contextual language, I distinguish direct access to members with staff present (which is the same as personal access to members without staff present) from access to staff only. A manual check shows that this keyword combination captures the relevant instances accurately and quite exhaustively.

Records of campaign contributions are much more straightforward to gather reliably than access-seeking, but the basic strategy is the same: identifying legislator mentions and comprehending the context. For example, the line “1/19/2010 \$500.00 Richard Burr for Senate”—transcribed from the report excerpted in Figure 3—is self-explanatory. Such entries tell which registrants (in-house or contracted) contributed to which candidates and the election cycles when these transactions occurred.⁹

About what do lobbyists contact legislators? Unfortunately, many registrants treat the topic of discussion with congressional offices and the client it concerns as optional,¹⁰ so the disclosure of the substance of contact is likely too unsystematic and irregular for statistical analysis that relies on it. The overall dominance of trade issues in foreign lobbying, however, relates back to the motives that connect lobbyists and legislators delineated earlier. On one hand, if legislators’ voter base has weaker opinions on—and are more indifferent toward—trade and foreign affairs than on domestic issues,¹¹ lobbyists will have a larger pool of indifferent legislators available to inform and persuade (Denzau and Munger 1986). From legislators’ perspective, the comparatively muted

voter opinion and the shortage of ideological and party cues on foreign issues allow them more discretion in their representation.

On the other hand, legislators’ upside for hearing trusted lobbyists out on matters of trade can be considerable. Legislators may very well be in a position to leverage their roles in congressional processes to channel trade gains back home and cater to voters’ existing productive advantages (Fordham and McKeown 2003). This is especially true for friendly governments with well-established ties with the United States (Zhang 2005). If constituents profit economically from trade, legislators will profit politically from making these gains possible. Lobbyists help foreign governments identify the legislators with suitable constituencies. For example, Saudi Arabia has rather famously enlisted high-profile lobbyists with Republican contacts to facilitate arms sales (Freeman 2019). In sum, both representational slack on a low-information issue and the potentially large political upside push legislators to listen to lobbyists that they can trust.

Dyads of Members of Congress and Lobbying Registrants

To examine how lobbyists’ campaign contributions relate to their requests for access to members of Congress, I create panel data containing unique dyads of members of Congress and lobbying registrants for each year. Merging these lobbying transactions with all sitting members of Congress by year results in member-registrant-year combinations which may contain campaign contributions, requests for access (successful or unsuccessful), or both. Recall that I treat each registrant as making contributions and seeking access collectively. In analysis, I pay special attention to registrants which consisted of a single lobbyist—the “solo subset” that links actions unmistakably to an individual.

Lobbying is an ongoing process, and activities disclosed in one report may continue through a subsequent one, as noted earlier. For example, a request for access disclosed in one report can prove successful by the time the registrant files its next one, and a contribution to a legislator listed in one report may be connected to a request for access listed in a later report. I explicitly take account of the ongoing nature of lobbying in aggregating the data by year.¹²

Legislator and Lobbyist Characteristics

Ideology can play a part even in foreign lobbying. With few pre-existing positions and little policy-relevant information on foreign issues, legislators need ways to decide whether to trust lobbyists’ input. Lobbyists’ overall ideology, though based mostly on domestic issues, can serve

this purpose. I gather the first-dimension DW-NOMINATE scores of members of Congress in order to calculate their ideological distance from lobbyists. The goal is to examine how the distance conditions the relationship between contributions and access. I also control for members' vote shares in their last elections, their party affiliation, whether their party was the chamber majority, whether they served in the House or the Senate, whether they occupied party leadership positions in Congress, and whether they sat on some of the most powerful committees (the House Ways and Means Committee and the House and Senate appropriations committees) as well as the committees principally in charge of foreign affairs (the House Foreign Affairs Committee, the Senate Foreign Relations Committee, and the House and Senate Homeland Security committees).

When examining how contributions relate to access seeking, I interact the main contribution variable with whether lawmakers won close elections (receiving 55% or less of the two-candidate vote in the general election or—when applicable—a runoff). This gets at whether lobbyists try to exchange money for access with financially needier politicians. I include the same interaction in the subsequent analysis on gaining access to test whether electoral vulnerability makes a legislator more (or less) inclined to grant access after receiving financial help. Furthermore, I control for registrant-fixed effects whenever statistical power allows in order to take into account each registrant's average amount of access sought and obtained. In the "solo subset," registrant-fixed effects are equivalent to lobbyist-fixed effects.

Lobbyist Ideology Inferred from Congressional Service

For lobbyists who had served in Congress as members or members' staff before representing foreign interests, I infer their ideological positions from their past congressional service. For data on lobbyists' career histories, I collect all "revolving door" career profiles on political figures prepared and published online by the Center for Responsive Politics. These profiles include individuals' previous service in government, including congressional positions.¹³

To get information on any past congressional positions held by lobbyists in the FARA data, I first searched for lobbyists among the career profiles by name. My undergraduate research assistants then verified whether these matches were correct by browsing biographical search results on the Internet on the matched individuals. With lobbyists linked to "revolving door" profiles, the FARA data contain a total of 9,498 distinct lobbyists who represented foreign clients, of whom 495 served in Congress.

Table 1. Campaign Contributions to Members of Congress and Lobbyist Requests for Access, 1998–2019.

Chamber	Contributed to campaign	All members	Requested access (Percentage of all members)
House	Yes	8,504	2,624 (30.9%)
	No	1,237,735	6,770 (0.5%)
Senate	Yes	3,836	1,150 (30.0%)
	No	285,277	2,677 (0.9%)

The counts are for members of Congress, and the percentages denote the share that a cell constitutes within its row. For example, lobbyists made campaign contributions to 8,504 Representatives. Of these Representatives, they requested access to 2,624 (30.9%).

Among these 495 lobbyists, in turn, 87 were former Representatives or Senators, while 408 served as congressional staff. To reliably gauge the ideological distance between the correct lobbyists and the legislators they tried to access, for this particular analysis I use only the portion of the "solo subset" with previous congressional work experience—and thus ideology scores. I measure the ideological positions of former members of Congress with their DW-NOMINATE scores, and measure those of former congressional staff with the NOMINATE scores of the members they worked for. Former staffers who worked for more than one member are taken to have the same NOMINATE scores as whichever member they served last.

Campaign Contributions and Requests for Access

The FARA data strongly suggest that lobbyists make campaign contributions at least in part to seek access to members of Congress. Table 1 shows how many legislators lobbyists attempted to access by whether they had contributed to their campaigns. Lobbyists requested access to three out of ten Representatives and Senators to whom they had contributed, in contrast with less than one percent of the other members, a differential that persisted from 1998 to 2019.

The real puzzle, however, may be why lobbyists sought access to so *few* of the members of Congress they contributed money to. This need not indicate wastefulness or irrationality on the part of lobbyists, however. A recent theory construes lobbying as insurance against political risks (LaPira and Thomas 2017), and this theory has received some empirical evidence (Ban, Palmer, and Schmeer 2019; Liu 2020). For wealthy lobbyists and lobbying firms, it is good practice to contribute to incumbents to accumulate human capital and to always have a long list of financial beneficiaries in Congress on call

Table 2. Linear Regressions of Campaign Contributions to Members of Congress and Lobbyist Requests for Access, 2016–2019.

	Requested access		
	All dyads		Solo subset
	Model 1	Model 2	Model 3
Contribution	0.264* (0.011)	0.263* (0.012)	0.268* (0.025)
Close race		0.0002 (0.001)	0.0005 (0.001)
Contribution × Close race		−0.003 (0.026)	0.087 (0.062)
Republican		−0.001 (0.001)	0.0003 (0.001)
Senator		0.005* (0.001)	0.004* (0.001)
Majority		0.0003 (0.001)	−0.001* (0.001)
Leadership		0.018* (0.006)	0.002 (0.002)
Power committee		0.001 (0.001)	0.001 (0.001)
Foreign affairs committee		0.011* (0.002)	0.004* (0.001)
Constant	−0.002* (0.001)	−0.006* (0.001)	0.017* (0.003)
Registrant (lobbyist) FE	Y	Y	Y
Year FE	Y	Y	Y
N	323,514	323,514	108,549
R-squared	.120	.122	.106
Adj. R-squared	.119	.121	.104
Chi-square	41,414.400*	42,136.470*	12,120.980*

FE = fixed effects.

* $p < .05$.

when the need for contact arises. Campaign contributions as the purchase of insurance without an immediate need to cash in likely constitute the main reason why lobbyists sought access to so few legislators after contributing to them.¹⁴

In Table 2, I use regressions to test for lobbyists' tendency to request access almost exclusively to recipients of their contributions. Estimated based on dyads of Congress members and lobbying registrants by year, all equations have a binary dependent variable indicating whether lobbyists requested access to a member.¹⁵ They control for registrant-fixed effects as well as year-fixed effects,¹⁶ and cluster standard errors by member. For these and all subsequent regressions in this paper, descriptive statistics for each variable can be found in Online Appendix B.

Model 1 estimates the simple bivariate relationship between contributions and requests for access. Model 2

interacts contributions with whether members fought in close races, a setup which gets at lobbyists' decision to target electorally vulnerable or secure legislators for access. The model also controls for member characteristics including their party affiliation (being a Republican rather than a Democrat or Independent), chamber of service (being a Senator rather than a Representative), majority status, and membership in party leadership structures, the particularly powerful committees, and committees that oversee foreign affairs. Model 3 estimates the same effect on the "solo subset."

The regression results underscore that campaign contributions to members of Congress are strongly and positively related to lobbyist requests for access. This effect is robust to controlling for member characteristics and registrant-fixed effects, and remains strong when limited to solo registrants. The connection between contributions and requests for access is no greater for electorally secure

members than for electorally vulnerable ones, as shown by the insignificant estimate for the interaction term between contributions and the close race variable. Members' positions on party leadership structures and foreign affairs committees are positively related to requests for access, but not their membership on the most powerful committees. Members' majority status turns out to be negatively related to requests for access in the solo subset, but this unexpected finding does not hold up in the full sample. The estimate for the contribution variable shows a substantively important relationship with access-seeking (nearly 30 percentage points) despite the various controls and fixed effects.

Campaign Contributions and Success in Gaining Access

That lobbyists requested access to 30 percent of legislators they had contributed to but hardly any other strongly suggests that contributions are at least partially intended to secure access to successful candidates. How, then, do lobbyists' campaign contributions relate to *gaining* access to legislators? For this analysis, I focus only on those cases in which a FARA registrant requested access to a legislator; that is, I exclude the great many dyads that do not contain requests, and quite appropriately. Without requesting it, lobbyists *by definition* cannot get access to a legislator.¹⁷ Including these instances when analyzing the relationship between contributions and getting access would incorrectly treat them as equivalent to requesting access but failing to obtain it.

Overall, lobbyists successfully gained access to just over a third (34.8 percent) of the legislators they attempted to access. Lobbyists who contributed to the members of Congress they tried to access were more likely to gain access than lobbyists who did not contribute by 8.4 percentage points. Contributing by no means guarantees the ability to get access, and not contributing by no means precludes it. As shown in Table 3, the two chambers again exhibit similar patterns, though Representatives were more likely to give access to lobbyists than Senators by a few percentage points irrespective of contributions received.

Success in gaining access tilted noticeably toward donors for most of the period between 1998 and 2019. Figure 4 displays this differential over time in the two chambers. In most years, contributions were associated with a greater likelihood of getting access to both Representatives and Senators. This differential persisted as legislators over the years became overall less likely to give access to lobbyists that requested it due to steadily rising demand. Two additional graphs highlight the rising demand for access, measured by the average number of

Table 3. Campaign Contributions to Members of Congress and Success in Gaining Access, 1998–2019.

Chamber	Contributed to campaign	Requested access	Gained access (Percentage of requests)
House	Yes	2,624	1,120 (42.7%)
	No	6,770	2,264 (33.4%)
Senate	Yes	1,150	420 (36.5%)
	No	2,677	799 (29.8%)

The counts are for members of Congress, and the percentages denote the share that a cell constitutes within its row. For example, lobbyists made campaign contributions to 2,624 Representatives to whom they requested access. Of these Representatives, they gained access to 1,120 (42.7%).

lobbying registrants that requested access per legislator in the two chambers, respectively. The demand maintained a course of linear increase over the 22-year period, more than tripling in both chambers.

Linear regressions displayed in Table 4 show statistical significance in the relationships observed between contributions and gaining access. Model 1 estimates the relationship between contributions and gaining success, controlling for member characteristics and registrant- and year-fixed effects. As mentioned earlier, the FARA data distinguish between lobbyist access to members of Congress themselves or their staff, and personal contact with members is a bigger win for lobbyists. Accordingly, Model 2 shifts the dependent variable to success in obtaining personal access to legislators, provided that access of either type is achieved. Models 3 and 4 replicate the last two on the solo subset in order to link contributions and access seeking to a specific lobbyist. By and large, the positive relationship between campaign contributions and access does not vary by members' electoral circumstance, though the significant interaction term in Model 2 suggests that vulnerable legislators are more likely to give personal attention to lobbyists. Other controls also show weak effects, though Senators (relative to Representatives) and members of powerful committees (relative to other legislators) were less likely to grant access to requesting lobbyists.

The coefficient estimate for campaign contributions is sizable and similar to what the raw data showed—around 10 percentage points in both the full data and the solo subset. With respect to gaining personal access to a legislator rather than her staff, the main coefficient in Model 2 shows an increase by 13 percentage points in predicted probability, a much better shot at an exceptionally scarce resource. For personal access, however, the estimate is substantively small and also loses significance in the solo subset.

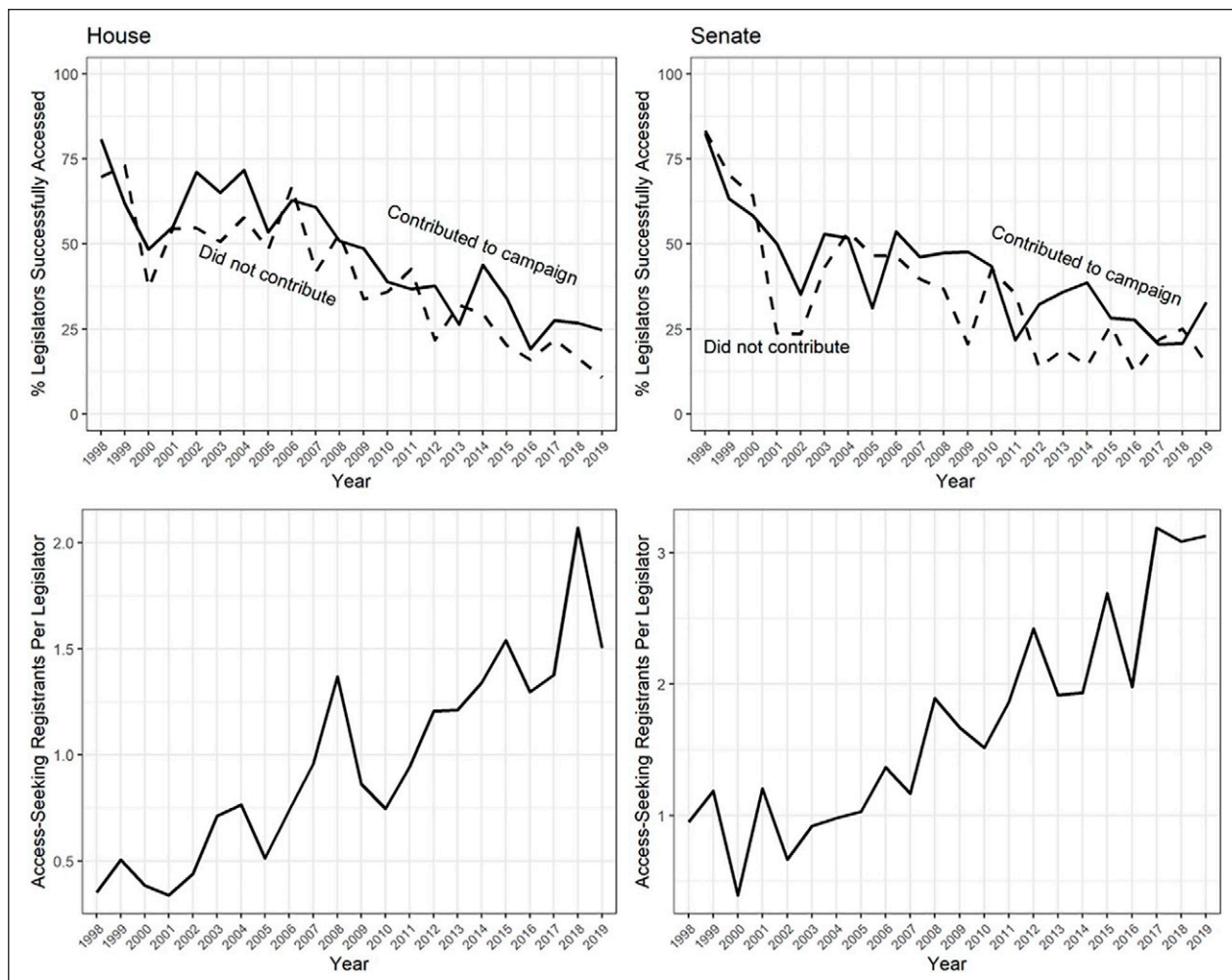


Figure 4. Campaign contributions to members of Congress and success in gaining access, conditional on requests for access, 1998–2019.

The two graphs on top portray lobbyists' success in gaining access to House and Senate members, respectively, by whether they made campaign contributions. The two graphs on the bottom portray the demand for access, measured by the average number of lobbying registrants that requested access per House and Senate member, respectively.

Contributions, Ideology, and Access

Existing research yields different expectations regarding whom campaign contributions should help the most—friends or adversaries—in their effort to gain access to legislators (Austen-Smith 1995; Lohmann 1995). By examining lobbyists with known ideology based on their past congressional service, I use the FARA data to descriptively shed light on this debate. This analysis shows that money and access are positively related only for copartisan lobbyists with similar ideological stances.

As mentioned earlier, of all the 9,498 distinct lobbyists present in the data, just 495 (5.2%) fall into this subset, and conditioning on requests for access winnows down this count further. It is also an unrepresentative sample of lobbyists. Lobbyists with previous congressional service

either as a member or as staff can be expected to have a much stronger stature in Washington politics than those without congressional experience, especially former lawmakers. In the lobbying marketplace, they are more likely to belong to large firms, represent wealthy clients (LaPira and Thomas 2014), and have clear party affiliations (Furnas, Heaney, and LaPira 2019). As a result, aside from the fact that lobbyists without congressional experience (and therefore outside this subset) may still have established ideological and partisan profiles that go unmeasured (e.g., former diplomats), findings based on this subset likely apply best to the elite of the profession and do not extend well to other lobbyists.

By party affiliation and whether or not they made a campaign contribution, Table 5 shows how many members of Congress lobbyists tried to access and how often

Table 4. Linear Regressions of Campaign Contributions to Members of Congress and Success in Gaining Access, 1998–2019.

	Gained access		Personal access	
	All dyads		Solo subset	
	Model 1	Model 2	Model 3	Model 4
Contribution	0.099* (0.009)	0.129* (0.017)	0.095* (0.027)	0.015 (0.044)
Close race	0.006 (0.011)	-0.028 (0.020)	0.035 (0.020)	-0.072* (0.036)
Contribution × Close race	-0.027 (0.023)	0.072* (0.037)	-0.013 (0.054)	0.078 (2.542 × 10 ¹³)
Republican	0.006 (0.008)	0.022 (0.015)	0.012 (0.017)	0.013 (0.029)
Senator	-0.027* (0.008)	-0.013 (0.015)	0.006 (0.017)	0.047 (0.029)
Majority	0.010 (0.007)	-0.007 (0.014)	-0.002 (0.018)	-0.003 (0.029)
Leadership	-0.019 (0.018)	0.042 (0.021)	0.034 (0.038)	0.026 (0.058)
Power committee	-0.003 (0.009)	0.038* (0.016)	-0.014 (0.018)	0.014 (0.031)
Foreign affairs committee	-0.006 (0.008)	-0.011 (0.015)	0.001 (0.017)	-0.070* (0.029)
Constant	1.339* (0.079)	0.755* (0.088)	1.519* (0.139)	0.828* (0.188)
Registrant (lobbyist) FE	Y	Y	Y	Y
Year FE	Y	Y	Y	Y
N	13,221	4,603	2,353	963
R-squared	.383	.378	.526	.578
Adj. R-squared	.366	.339	.485	.509
Chi-square	6,393.889*	2,187.212*	1,755.105*	831.486*

FE = fixed effects.

p* < .05.Table 5.** Campaign Contributions to Members of Congress and Access Seeking by Party Affiliation 1998–2019.

Party affiliation	Contributed to campaign	All members	Requested access	Gained access (percentage of requests)
Same party	Yes	236	100	38 (38%)
	No	17,660	294	62 (21.1%)
Opposing party	Yes	97	28	15 (53.6%)
	No	18,073	164	100 (61.0%)

The counts are for members of Congress, and the percentages denote the share that a cell constitutes within its row. For example, lobbyists made campaign contributions to 236 copartisan legislators and requested access to 100 of them. Of these 100 legislators, lobbyists gained access to 38 (38%).

they succeeded. In seeking access to incumbents, lobbyists unsurprisingly showed a strong preference for copartisans (Hall and Deardorff 2006; Hojnacki and Kimball 1998; Koger and Victor 2009), going after more than twice as many copartisans as opposing party members. Lobbyists' success in getting access and its relationship with contributions exhibit different dynamics across the

parties. For copartisans, lobbyists gained access to 38 percent of legislators they had contributed to, 17 percentage points more than others. The pattern disappears for the opposing party, however; lobbyists gained access to 53.6 percent of opposing party members they had contributed to and 61 percent of those they had not. Not only did lobbyists achieve more success with opposing party

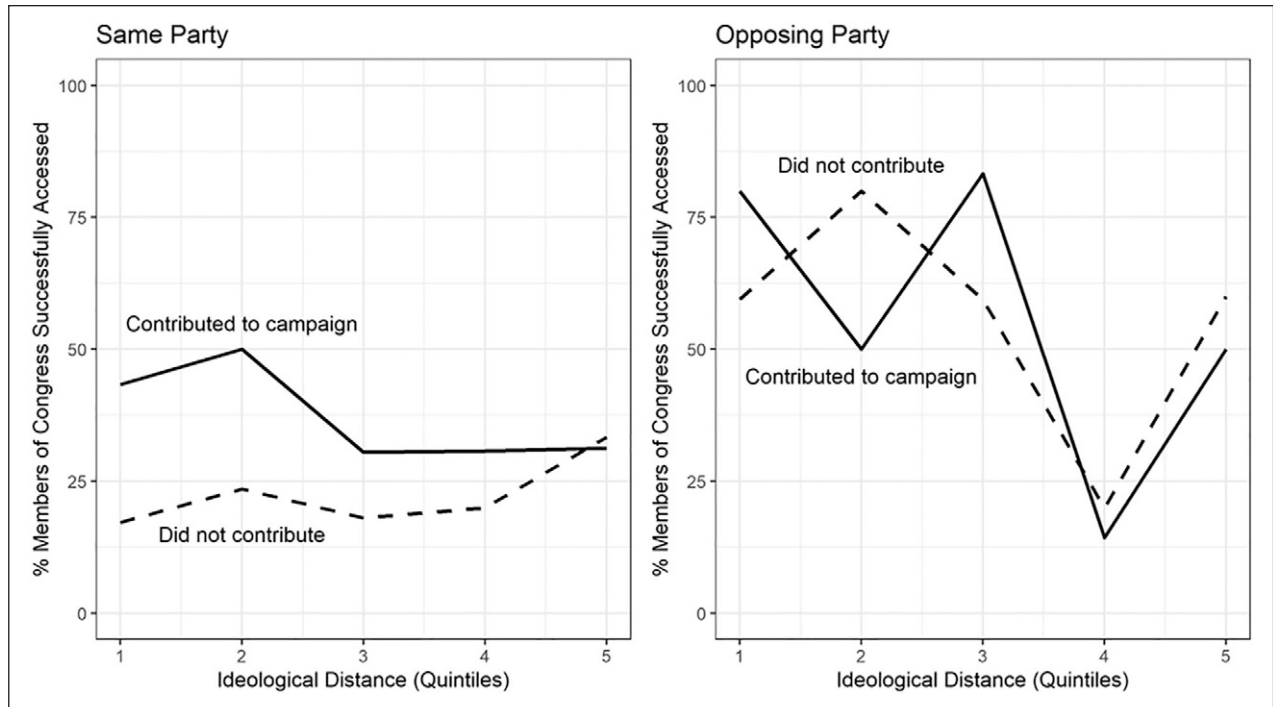


Figure 5. Campaign contributions to members of Congress, ideological distance, and success in gaining access by party affiliation.

legislators than with copartisans regardless of contributions, contributions are somehow unrelated or even negatively related to access to those legislators. Lobbyists' paradoxical success with the opposing party, along with their preference for copartisans, suggests a more selective approach to lobbying across the aisle: Lobbyists may request access to opposing party legislators who they are fairly confident will grant it based on some prior belief. Of course, this is speculative.

In Figure 5, separately for copartisans and the opposing party, I plot the differential rate of success for lobbyists who contributed to the members they attempted to access and those that did not, across equal-sized quintiles of ideological distance. For copartisans, increases in ideological distance are not associated with changing likelihood for legislators to give access to lobbyists, but it closes the gap between donors and non-donors. For the opposing party, however, greater ideological distance is associated with rapidly diminishing chances of getting access for both donors and non-donors. Overall, lobbyists achieved the highest rate of success with ideologically similar opposing party members, an observation consistent with the conjecture that lobbyists selectively targeted the most receptive opposing party legislators. On foreign issues, moderates in Congress may find policy input from moderate lobbyists in the other party particularly welcome.

In Table 6, I present regressions in support of this finding. In Models 1 and 2, the dependent variable is gaining

access given a request. Models 3 and 4 shift the dependent variable to gaining access to legislators personally rather than their staff, given success in achieving access of either kind. I test for the mediating role of ideology by interacting contributions with ideological distance. The sample contains insufficient within-lobbyist variation for lobbyist-fixed effects, so I control for lobbyists' number of clients instead. Model 1 includes the interaction term and its additive components, member and registrant controls, as well as year-fixed effects. Model 2 replicates Model 1 for copartisan legislators as patterns seen above suggest a similar dynamic within this group. Models 3 and 4 model personal access on the predictors for all legislators and just copartisans, respectively.

According to Model 1, contributions are positively related to the likelihood of gaining access to ideologically identical members, but this effect dwindles as ideological distance increases. For lobbyists who did not contribute, legislators' ideological distance from them is on average positively related to the likelihood of gaining access, consistent with Table 5. Based on a logit model with the identical variables as Model 1 (included as Model 3 in Online Appendix D.1), in Figure 6 I visualize the interaction of contributions and ideological distance in predicting the likelihood of gaining access, holding all other variables at their modes or, for lobbyists' number of clients, mean. This interaction effect becomes less precisely estimated for copartisans, according to Model 2. On personal

Table 6. Linear Regressions of Campaign Contributions to Members of Congress, Ideological Distance, and Success in Gaining Access, 1998–2019.

	Gained access		Personal access	
	All legislators	Copartisans	All legislators	Copartisans
	Model 1	Model 2	Model 3	Model 4
Contribution	0.272* (0.059)	0.226* (0.066)	0.207* (0.098)	0.465* (0.140)
Ideological distance	0.125* (0.057)	0.097 (0.166)	-0.039 (0.108)	0.374 (0.382)
Contribution × Ideological distance	-0.466* (0.170)	-0.316 (0.390)	-0.165 (0.190)	-0.583 (0.540)
Republican	-0.038 (0.045)	0.071 (0.081)	0.028 (0.081)	-0.437* (0.196)
Senator	0.043 (0.039)	-0.017 (0.041)	0.230* (0.069)	0.176 (0.099)
Majority	-0.008 (0.044)	0.045 (0.078)	0.001 (0.078)	0.001 (0.198)
Leadership	0.062 (0.062)	0.072 (0.061)	0.143 (0.107)	0.131 (0.164)
Power committee	0.002 (0.028)	0.004 (0.032)	0.075 (0.051)	0.123 (0.080)
Foreign affairs committee	-0.050 (0.030)	-0.085* (0.032)	0.009 (0.050)	0.006 (0.072)
Number of clients	-0.109* (0.030)	0.062 (0.048)	-0.135* (0.042)	-0.096 (0.053)
Constant	0.422* (0.116)	0.337* (0.160)	0.074 (0.154)	0.034 (0.155)
Year FE	Y	Y	Y	Y
N	586	394	215	100
R-squared	.585	.544	.649	.684
Adj. R-squared	.565	.512	.604	.588
Chi-square	515.599*	309.567*	225.009*	115.176*

FE = fixed effects.

*p < .05.

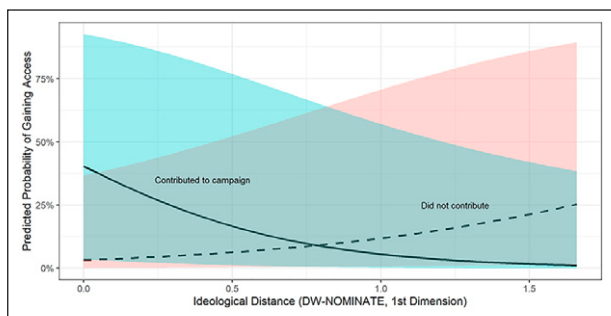


Figure 6. Campaign contributions to members of Congress and predicted probability of gaining access, with 95% confidence intervals, based on logit model mirroring Model 1 in Table 6. All control variables are held at their modes or, for lobbyists' number of clients, mean.

access, the interaction of ideological distance and contributions falls short of significance though they maintain

the expected negative sign in Models 3 and 4; the dearth of available observations is unhelpful for measuring it precisely.

The aforementioned caveat of generalizability aside, that contributions are most strongly and positively associated with gaining access to ideologically similar copartisans adds another dimension to same-side lobbying: Lobbyists and officials in similar networks exchange resources most readily. From the perspective of legislators, allied lobbyists are a natural base for fundraising. Thus, it may be in their interest to foster the belief among these resource-rich allies that money does grease the wheel; there may, paradoxically, be some room for pay-for-play politics among friends. The absence of visible pay-for-play across parties casts doubt on the possibility for lobbyists to use money to compensate for policy disagreement with legislators (Lohmann 1995). Furthermore, that lobbyists' success in getting access somehow peaks

among the ideologically closest members of the *other* party may suggest that swing votes in Congress facilitate “counteractive lobbying” (Austen-Smith and Wright 1994) by opening themselves up to informational input from ordinarily adversarial interests.

Conclusion

Constrained by limited time and attention their offices can afford, members of Congress do not indiscriminately give access to people. Rather, they do so selectively by considering whether they can trust the access seeker to supply electoral support, policy-relevant information, or both. Lobbyists are thus well-advised to make campaign contributions to legislators whom they anticipate contacting. By financing legislators’ campaigns, contributing lobbyists convey support for their reelection and—by extension—their legislative actions while in office, which helps them win legislators’ trust. Many overlapping empirical patterns indicate that lobbyists understand this function of money, with contributions pointing clearly toward natural contacts in Congress (Fourinaies and Hall 2014, 2015, 2018; McKay 2018; Powell and Grimmer 2016).

Novel data on foreign lobbying are particularly suited for examining lobbyists’ use of contributions for relationship maintenance. The disclosure of contact reveals crucial information on lobbyists’ access-seeking behavior on Capitol Hill—the distinction between members of Congress to whom they did not seek access, those they sought access to but unsuccessfully, and those to whom they obtained access. In analyzing the FARA data, I first focus on intent and show that a major purpose of contributions is seeking access to successful candidates; lobbyist requests for access focused strongly on recipients of their contributions. I then turn to transpired contact and show that past contributions are associated with a better chance for lobbyists to obtain access. Allied lobbyists and legislators are mainly responsible for this association, however; the positive link between contributions and access is limited to the like-minded.

These results are consistent with the long-standing theory that money buys donors access to legislators. It seems all but certain that a causal pathway going in this direction must be responsible for much of the findings, especially given recent experimental evidence that money does buy access (Kalla and Broockman 2016). Of course, the descriptive nature of this study ultimately makes such an assertion speculative. The results, however, are quite suggestive of the bonds that lobbyists maintain with legislators and the central role of money in their interaction. As much as lobbyists wish to buy access to legislators with contributions, legislators likewise wish to buy contributions with access. Both use a currency they have to purchase a resource they need.

The identity of the lobbying clients has not played an integral part in this study, but therein lie some potentially fruitful extensions for future research. As mentioned in the paper, lobbyists representing foreign entities likely have sole control over campaign contributions, among other aspects of lobbying strategy, due to legal restrictions on foreign nationals’ direct involvement in elections. At the same time, lobbying firms’ simultaneous representation of domestic and foreign clients—common for large K Street firms—may complicate this assumption somewhat. A potential opportunity for further research lies in exploring how the relationship between contributions and access varies by the makeup of firms’ clienteles, which can illuminate how legislators interpret lobbyist contributions. If contributions achieve different results for Firm A, which represents foreign clients exclusively, than for Firm B, which represents mostly domestic clients and comparatively few foreign clients, what can that tell us about the policy message—and baggage—that money carries?

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Notes

1. For example, Powell and Grimmer (2016) assume that PACs contribute to committee members to gain access to them.
2. Depending on their type, organized interests can provide other forms of electoral support such as endorsements and ads, but campaign contributions require few group-specific skill sets and are thus more universal.
3. To be sure, illegal contributions funded by foreign sources do occur, as exemplified by Trump donor and American lobbyist Imaad Shah Zuberi’s guilty plea in 2019 partly to campaign finance charges (<https://www.politico.com/states/california/story/2019/10/22/donor-who-gave-900k-to-trump-inaugural-to-plead-guilty-to-illegal-contributions-1225898>). Such controversies aside, there is no

- evidence that any significant portion of foreign lobbying, especially activities reported under FARA, is illegal.
4. <https://efile.fara.gov/ords/f?p=107:21::NO::>
 5. The information extraction process described below was time-consuming, particularly the process of converting image-scanned reports—often containing dozens of pages each—into usable text via optical character recognition (OCR). This led me to significantly limit the span collected. Somewhat arbitrarily, I selected 1998 as the start to coincide with the domestic lobbying disclosure data compiled by the Center for Responsive Politics (<https://www.opensecrets.org/federal-lobbying>), if that dataset ever became necessary. For this project, as it turns out, it did not.
 6. It is unclear whether governmental and business entities exhibit different patterns in the behaviors I study, but the numerical predominance of governments increases the likelihood that my analysis compares “apples to apples.”
 7. See Online Appendix A.1 for a fuller description of the machine learning models and their validation. See Online Appendix D.4 for a robustness check that removes instances of likely lower-quality access of a more social nature, like breakfast meetings, from model classifications.
 8. This method requires that registrants note the staff titles consistently (a full list provided in Online Appendix A.2). Sometimes staff titles are omitted, which causes access to staff to be mistakenly recorded as access to legislators personally and therefore an overestimation of the relationship between campaign contributions and personal access in that supplementary analysis. Future research can rectify this by using historical rosters of congressional staff, which would allow text searches of staffers by name.
 9. See Online Appendix A.3 for a full list of words and phrases I detect to identify campaign contributions. See Online Appendix D.3 for a discussion of how the FARA disclosure of contributions compares with records of the Federal Election Commission (FEC), along with a robustness check that supplements FARA disclosure with the FEC data.
 10. FARA does not specify how much detail about intended or transpired contact with U.S. officials needs to be disclosed, so lobbyists place the most emphasis on fulfilling the obligation of disclosure to avoid DOJ complaints. For example, see a “guide for the perplexed” regarding FARA compliance recently circulated by lobbying firm Covington & Burling (https://www.cov.com/-/media/files/corporate/publications/2018/01/the_foreign_agents_registration_act_fara_a_guide_for_the_perplexed.pdf), whose main concern stops at what types of events “trigger registration.”
 11. Public opinion on foreign affairs, particularly salient issues, can be pronounced (Powlick and Katz 1998), but this “if” seems plausible with respect to the country-specific issues that lobbying clients typically care about.
 12. As calendar years have effectively coincided with sessions of Congress since the 1930s, organizing member-registrant dyads by year should allow sufficient time for requests for access to play out. In Online Appendix D.2, however, I further collapse the data from year-level to Congress-level as a robustness check, in which access is said to be obtained as long as successful contact takes place during either congressional session.
 13. I considered two alternative data sources for lobbyist ideology. The first is lobbyists’ disclosure of past government employment under the LDA. Compared with this source, the CRP career profiles are more complete, particularly in foreign lobbying. Lobbyists who represented foreign clients but never represented domestic clients would never appear in the LDA data and disclose past government positions there. The second is lobbyists’ DIME scores as estimated in the Database on Ideology, Money in Politics, and Elections based on campaign contributions. I opt not to use DIME scores for two reasons. First, although more lobbyists have DIME scores than congressional career histories, the vast majority of their scores are based on fewer than eight unique contribution records, which Adam Bonica considers the minimum for reliable estimates. Excluding the unreliable estimates renders the number of available lobbyists far lower than past congressional service allows. Second, as DIME scores are summaries of campaign contributions, this ideology measure is endogenous to the very processes I analyze.
 14. See Online Appendix C for a discussion of three other possible explanations.
 15. For ease of interpretation, I display linear models in the paper. In Online Appendix D.1, however, I estimate logit regressions which parallel the linear models to show that the key coefficient estimates are robust in either functional form.
 16. When estimated based on the full data, the two-way fixed effects model is computationally intensive. Out of expediency (but incurring no real loss for the analysis), I run the regressions on just the 2016–2019 subset in Table 2. The coefficient estimates remain highly stable when computed over three different time spans, as shown in Online Appendix D.5.
 17. This is a data assumption more than a real-world fact. Legislators can solicit contact from interest group representatives instead of the other way around. A major example of legislator-initiated access is witness testimonies at congressional hearings, which are by committee invitation only. Such legislator-initiated contact on record, however, seldom involves professional lobbyists, and FARA reports make no indication that foreign lobbyists receive legislator contact with any significant frequency.

Supplemental Material

Replication code and data available at: <https://doi.org/10.7910/DVN/SAFK1W>. Supplemental materials for this article are available with the manuscript on the *Political Research Quarterly* (PRQ) website.

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