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Presidential Messages on Legislation and the Congressional Targets of Lobbying

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ABSTRACT

Despite strong reasons to expect presidents' announced stances on legislation to influence how organized interests lobby Congress, this effect remains underexplored. I advance a theory that Statements of Administration Policy (SAPs), sent by presidents to Congress to convey their positions on legislation, may also send signals to interest groups about when to lobby Congress and which legislators to lobby. To test it, I analyze panel data combining SAPs issued by Clinton to Biden, records of lobbying contact extracted from reports filed under the Foreign Agents Registration Act (FARA), and committee and floor agendas in Congress. Analysis of both committee and legislator data shows that SAPs strongly predict whom lobbyists choose to target, and more so than congressional agendas alone can explain. Furthermore, SAPs predict more advocacy specifically by elite lobbying firms. These findings suggest that presidential position-taking may elicit responses not only from Congress but also from organized interests and draw battle lines for both institutional and outside actors.

How do presidents mobilize interest group activity? On the mobilization of organized interests, one of the most studied topics in American politics (e.g., Walker 1991; Nownes and Neeley 1996), a prevailing theory casts the state as the agenda-setter and interest groups as followers that mobilize in response to expanding government authority and shifting legislative priorities (Walker 1991; Leech et al. 2005). Within this tradition, the presidency—arguably the most visible and agenda-defining political actor—remains curiously under-examined. Existing work has linked presidential attention to lobbying in select issue areas (Baumgartner et al. 2011) and explored how presidents seek to build coalitions among interest groups (Peterson 1992; Miller 2023), but we know little about how direct presidential intervention in the legislative process affects lobbying behavior. In particular, scholars have rarely examined how presidents influence who in Congress gets lobbied despite a rich literature on interest groups' strategic targeting of legislators (e.g., Hojnacki and Kimball 1998; Miller 2022; You 2023).

This gap in research is understandable given how lobbying is observed. Most lobbying aims at Congress rather than the executive branch (Baumgartner et al. 2009), and presidential influence on congressional lobbying must intrinsically be manifested through lobbying of Congress rather than of the presidency itself. It is, in summary, analytically difficult to separate presidential influence on congressional lobbying from *congressional* influence on congressional lobbying. But why expect presidential signals to Congress to affect when interest groups lobby and which legislators to lobby? I advance a theory that presidential signals, in the form of Statements of Administration Policy (SAPs), promote lobbying and set its targets by incorporating bills into the president's agenda and giving them a partisan frame. I further theorize that SAPs serve to concentrate lobbying among elite firms while comparatively depressing representation by nonelite firms.

Regarding the explanatory factor, SAPs have been a standard institutional tool for presidents to influence legislation with a fine focus since 1985. Compared to other policy

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pronouncements by the president, such as public speeches, SAPs are much more integral to the legislative process because they attempt to sway Congress on policy already receiving its attention rather than proposing new legislation. Correspondingly, they are targeted in that they are sent expressly to the House, Senate, or their committees—the institutional recipient is noted prominently. SAPs unequivocally lay out the president's positions on legislation in detail (Ostrander and Sievert 2020), and offer a much more inclusive and complete account of the president's "institutional agenda" than other sources of legislative messaging (Kernell et al. 2019).

The outcome side of lobbying entails a major data challenge: examining the influence of SAPs, which are targeted signals, requires information on the specific congressional targets of lobbying. I examine lobbying in the United States by foreign entities because the disclosure of foreign lobbying, pursuant to the Foreign Agents Registration Act (FARA), uniquely makes available data on the targets of lobbying (You 2020, 2023; Liu 2022)—a major advantage over the more frequently studied domestic lobbying disclosure data (LaPira et al. 2020). A drawback of the FARA data is that they offer no systematic information on the specific policy, including the congressional bills that each lobbying contact concerns. This precludes linking lobbying contact to the bills SAPs concern. I address this problem by limiting my analysis to foreign relations bills and the SAPs they draw: since FARA reports by definition concern foreign relations, it is reasonable to presume that the congressional contact disclosed in them probably pertains to foreign relations legislation. Later, I describe the specific data choices this assumption motivates, as well as supplementary analysis that uses all SAP-drawing bills instead of just foreign relations bills for contrast with the main analysis.

An episode of Russian lobbying of Congress can illustrate SAPs' plausible effect. In November 2012, an Obama SAP stated that "the Administration strongly supports" H.R. 6156, the Russia and Moldova Jackson–Vanik Repeal and Sergei Magnitsky Rule of Law Accountability Act, which imposed sanctions on Russian officials deemed responsible for the death of tax lawyer Sergei Magnitsky.¹ Russian government-backed representatives had begun lobbying against the bill before the SAP.² Lobbying after the SAP, however, became dominated instead by Russian opposition figures, including prominent opposition leader Boris Nemtsov, in line with a bipartisan consensus solidified by the SAP in favor of the Russia sanctions.³ The bill passed shortly afterwards for Obama to sign into law. Beyond this case, "informational materials" filed under FARA occasionally reference SAPs, though rarely framing them as primary lobbying motives.⁴ While suggestive of SAPs' influence on lobbying, such anecdotal evidence also illustrates an inferential challenge: even when SAPs plausibly drive lobbying, neither news coverage nor foreign agents themselves tend to frame lobbying explicitly around presidential statements.

The predictor, the outcome, and various other information combine to form three panel data sets: one on congressional committees, one on committee members, and one on members of Congress at large—all organized in half-year periods. They cover the years 1995 to 2022 and the Clinton to Biden presidencies. Analyzing the data, I find that SAPs are predictive of the amount of lobbying received by congressional committees

and their members when the congressional legislative agenda itself and its most significant component are already accounted for. Regarding lobbying of members of Congress at the floor stage of lawmaking, I similarly find that SAPs are overall positively related to lobbying that legislators receive. Additional analysis shows that, while SAPs are associated with more lobbying in general, they appear to have a concentrating effect of lobbying onto the top firms and away from advocates in the periphery of the profession.

These findings suggest that interest groups react to presidential signals on legislation in predictable ways on top of the congressional agenda itself—an underexplored facet of their allocation of resources in a separated powers system (Baumgartner et al. 2011). This study also furthers our understanding of how presidents can exercise power on Congress indirectly by cueing interest groups, which engage with Congress much more frequently than with the presidency, about which bills to lobby on, how to lobby, and which lawmakers to target. Such indirect influence adds to the known presidential strategies of courting interest groups directly (Peterson 1992; Miller 2023). For their part, interest groups' and lobbyists' responses to presidential signals by tailoring lobbying strategy suggest that they take these signals seriously, a measure of presidential credibility and effectiveness.

A crucial boundary condition for interpreting these findings arises from the "two presidencies" thesis (Wildavsky 1966), which famously argues that presidents operate in two distinct policy domains: foreign and domestic. In foreign affairs, presidents enjoy greater institutional prerogatives, informational advantages, and public deference, while Congress is less assertive and more inclined to defer to executive leadership. Subsequent scholarship has shown that presidential threats and statements are especially credible in the foreign policy arena—whether in matters of war or trade—where institutional authority and public expectations grant presidents more leverage and where members of Congress face lower political costs for deference (Kriner 2009; Howell and Pevehouse 2011; Lowande et al. 2018; Zirpoli 2025). In contrast, domestic policymaking invites more intense partisan contestation and institutional rivalry. These asymmetries imply that the dynamics observed here, in which SAPs shape lobbying by foreign entities presumably on foreign relations, likely represent a ceiling on presidential influence. If presidential signals are more authoritative in foreign affairs, their effects on interest group behavior in domestic contexts should be weaker, or at least more contingent on congressional preferences.

1 | Presidents' Legislative Messages and Lobbying Targets

Intervention from the president is not the most obvious place to look for motivations for interest groups to lobby Congress. For one thing, the president's legislative messages respond to legislation that has already progressed to some significant stage of the congressional process and typically has already advanced to the floor. If lobbying consists mainly of legislative subsidy provided to shape bill content at the committee stage (e.g., Hall and Wayman 1990; Evans 1996; Hall and Deardorff 2006), SAPs should generally come after much lobbying has already been

ongoing or even completed. If SAPs sway legislators, they may depress rather than increase interest in lobbying by reducing legislators' need for information from outside interests. If SAPs make bills more likely to pass, organized interests may be better off lobbying the executive branch on the implementation of legislation after enactment (You 2017). If SAPs make bills less likely to succeed, they encourage bill opponents to free ride, sit back, and let the president deliver the kill. They may, of course, also encourage bill supporters to lobby more to overcome president's influence, but whether such a campaign of resistance is worthwhile seems highly context-dependent.

Nonetheless, there is reason to expect that SAPs do motivate more lobbying, and it is more compelling and universal than reasons against this expectation. SAPs help presidents, who are not vested with formal agenda-setting authority by the Constitution, define their legislative agendas (Ostrander and Sievert 2020). By issuing SAPs, presidents make the passage of bills through Congress (in the case of support SAPs) or their defeat (in the case of opposition or veto threat SAPs) more central to their legislative agendas and thus more partisan. The heightened partisan character of SAP-drawing legislation then attracts more lobbying. This mechanism contains several parts that need unpacking.

The first part is that SAPs make legislation more partisan by corraling members of Congress around divides established by the president. Regarding veto threat SAPs in particular, Guenther and Kernell (2021) quote a Clinton aide as saying that "veto threats represent excellent opportunities to highlight [his] agenda and contrast it favorably with Republican proposals... [and] unite Democrats" (631). Members of Congress set rules of consideration and vote on bills apparently in response to SAPs. On procedure, Kernell (2023) shows that SAP veto threats tend to elicit restrictive and closed rules, a partisan tool to guard legislative agenda (122). On roll calls, leaders of the president's party consistently align their votes to back up the president's SAPs—both veto threats and otherwise—and leaders of the opposition party tend to do the opposite (Kernell 2023, 128–129). The putative agenda-setting and partisan function of veto threat SAPs extends readily to other types of SAPs; all SAPs amount to public position-taking by the president and thus are capable of engendering partisan conflict in Congress (Ostrander and Sievert 2020). Indeed, SAPs constitute the broadest, most specific, and simultaneously a highly public record of presidents' institutional agendas (Kernell et al. 2019).

The second part of the mechanism hinges on legislators' interest in advancing both their party's legislative agenda and that of a co-partisan president. When SAPs incorporate targeted bills into the president's legislative program, these bills become more salient to legislators who are motivated by the pursuit of collective party success (e.g., Lebo et al. 2007). Moreover, legislators recognize that their own electoral fortunes are often tied to the president's legislative achievements (Lebo and O'Geen 2011), giving them an additional incentive to back the president. For members of the party opposing the president, motivated by similar collective electoral concerns but cutting in the other direction (see Aldrich and Rohde 2000; Lee 2008; Lebo and O'Geen 2011), SAPs constitute presidential signals to defeat. As a result, bills that receive SAPs tend to attract heightened legislative attention—whether to promote them or to block them—depending on partisan alignment.

The third part of the mechanism involves organized interests. When allocating lobbying resources, groups face competing incentives regarding which bills to prioritize. Salient and highly partisan bills attract many advocates, making influence harder to claim and policy change less certain (Baumgartner et al. 2009). Resource-constrained groups may therefore avoid these crowded arenas or free-ride on others' efforts. Yet salience and partisanship also mobilize groups embedded in partisan networks, for whom lobbying serves both instrumental and symbolic purposes: signaling commitment, maintaining network standing, and reinforcing partisan alignment (Crosson et al. 2020; Furnas et al. 2019). SAPs amplify these attributes, cueing aligned groups to coordinate lobbying with the administration's legislative priorities (Guenther and Kernell 2021; Miller 2023).

Legislators are more responsive to interest group pressure when policy issues are prominent or visible (Nicoll Victor 2007), and highly polarized bills increase the demand for aligned external support (Kollman 1997). Groups are more likely to invest lobbying resources when they can rely on "governmental allies" (Mahoney and Baumgartner 2015)—and coalitions can help the majority party forge internal consensus (Lorenz 2020). Consistent with evidence that lobbying is often partisan rather than neutral (Furnas et al. 2019; Koger et al. 2009), SAPs serve as focal signals that coordinate legislators and cue interest groups to align their efforts with the administration's priorities. In this way, SAPs enable groups to formulate targeted strategies for specific legislators—while mirroring presidents' tendency to engage selectively with co-partisan interests (Miller 2023).

A further motivation for lobbying in response to SAPs arises from relational considerations. Aligned groups may lobby not only to influence outcomes but also to signal loyalty and cultivate future access, securing downstream benefits such as favorable regulatory treatment, executive appointments, or inclusion in policymaking coalitions (Peterson 1992). Consistent with this lobbying motive, Miller (2023) shows empirically that presidents selectively reward well-resourced, aligned groups that visibly support their agenda, providing these actors with preferential access and attention. This relational mechanism complements the instrumental logic of SAPs, intensifying lobbying by high-profile, aligned actors. SAPs' demobilizing effect again comes into view: less central or peripheral groups may defer to more prominent advocates, especially as bills become highly partisan and choices dichotomous (LaPira et al. 2014; Furnas et al. 2019)—a differential effect of SAPs which I elaborate on below.

SAPs may have another demobilizing effect on lobbying, one that is easiest to see in the case of negative SAPs. When the president's party controls the chamber of Congress which receives an SAP that opposes or threatens to veto a bill, the SAP can depress lobbying by persuading bill supporters to retreat if it successfully rallies the majority against the bill. This is because the majority can use its agenda-setting power to prevent the bill from coming to the floor, and the minority knows that it can (Cox and McCubbins 2005; Gailmard and Jenkins 2007). It has been shown that veto threats effectively ward off unwanted provisions, including during divided government (Guenther and Kernell 2021; Lewallen 2025). This dampening effect on lobbying by bill supporters should not exist when they, or the party opposing the president, control the receiving chamber;

under these circumstances, the president's co-partisans cannot guard the agenda against the bill, rendering veto threats not credible. Thus, I expect the negative SAPs' effect on lobbying to depend on who controls Congress.

Unlike negative SAPs, I expect positive SAPs to increase lobbying more uniformly, regardless of which party controls the receiving chamber. House and Senate majorities cannot force the passage of bills as confidently as they can block it from consideration (Cox and McCubbins 2005, 2007). These expectations, however, cannot be tested with the empirical strategy outlined below, which centers on aggregating SAPs and lobbying contact by time period; it is impossible to partition lobbying during a period into components and to attribute these components specifically to positive and negative SAPs.⁵

As I detail later, SAPs can be sent during either the committee or floor stage of the congressional process. Correspondingly, in the analysis to follow, I test the following hypotheses—one about committees, one about committee members, and one about Congress members at large on the floor:

- **Committee Hypothesis:** The number of SAP-drawing bills under a committee's consideration will increase the amount of lobbying it receives.
- **Committee Member Hypothesis:** The number of SAP-drawing bills under a committee's consideration will increase the amount of lobbying its members receive.
- **Floor Hypothesis:** The number of SAP-drawing bills under consideration on the congressional floor will increase the amount of lobbying legislators receive.

1.1 | SAPs and Lobbying Representation by Top Firms

I make one more prediction. The coexistence of mobilizing and demobilizing effects of SAPs on lobbying suggests that SAPs not only motivate lobbying but also regulate who lobbies. SAPs provide authoritative signals of executive preferences and veto threats, which alter the strategic environment in which lobbyists operate. By clarifying the administration's stance and narrowing the range of viable legislative outcomes (Ostrander and Sievert 2020), SAPs reduce policy uncertainty while raising the stakes for influencing pivotal lawmakers. This shift transforms the expected returns to lobbying: the marginal return to insider access rises, while the payoff to diffuse or exploratory lobbying declines. As policy alternatives become dichotomous, effective lobbying depends less on the volume of activity and more on selective, high-quality access to decision makers capable of shaping final outcomes.

From an organizational and network perspective, this strategic shift reconfigures the structure of influence within Washington's lobbying community. SAPs do not merely trigger more lobbying; they concentrate lobbying activity in the hands of firms positioned at the center of political and informational networks. Lobbying markets are highly stratified, with a small number of elite firms brokering relationships between clients and policymakers and capturing disproportionate access to key decision-makers (LaPira et al. 2014; Furnas et al. 2019). When

presidential engagement heightens partisan coordination between the executive branch and aligned legislators, clients rationally gravitate toward firms that can interpret presidential signals, anticipate legislative amendments that could trigger vetoes, and provide reliable access to key legislators. Firms on the periphery, lacking such relational and informational capital, face diminished returns to lobbying and thus withdraw from engagement.

SAPs therefore function as both informational filters and network amplifiers: they winnow the field of legislative alternatives while simultaneously reinforcing stratification within the lobbying industry (LaPira et al. 2014). The result is a concentration of legislative lobbying around the most connected and resource-rich actors. I test this expectation by comparing lobbying done by top-100 firms and by non-top firms by revenue as a function of SAP-drawing bills, a conventional dividing line between elite and nonelite firms. I further expect SAPs' concentrating effect on elite firm advocacy to be stage-dependent: it should be more manifest at the floor stage, where SAPs narrow legislative choices, than at the committee stage, where SAPs encourage both major and minor players to shape bill content while they still can (Ostrander and Sievert 2020; You 2023). I test for this stage dependency by comparing SAPs' concentrating effect in committees and on the floor.

In summary, I test the following additional hypotheses:

- **Stratification Hypothesis:** The number of SAP-drawing bills under consideration will concentrate lobbying representation among elite firms.
- **Stage Dependency Hypothesis:** The concentrating effect of SAPs on elite firm representation will be stronger on the congressional floor than in committee.

2 | Empirical Strategy and Data

SAPs are targeted signals, not only because they list an intended congressional recipient (committees or floors) but because legislators' varying stakes in presidential success motivate different reactions to presidential signals (Aldrich and Rohde 2000; Lee 2008; Lebo and O'Geen 2011). This means that they cue interest groups not only on which bills to lobby and how, but which legislators and committees to target.

The targeted nature of the theorized effect necessitates data not just on whether lobbying increases after an SAP, but where that lobbying goes. A sort of event analysis would be ideal, one that entails chronicling SAPs and any lobbying that ensues, directed at the congressional targets the SAPs aim at. This level of precision is often missing from lobbying research due to data constraints. The primary constraint concerns information on who gets lobbied. The most widely used data source on lobbying activity, reports filed under the Lobbying Disclosure Act (LDA), does not reveal lobbying targets with sufficient detail, particularly in the legislative branch (see LaPira et al. 2020).⁶ This rules out using LDA data to analyze presidential influence on who gets lobbied. Happily, reports filed under FARA provide information on the specific targets of lobbying, including congressional committees and members of Congress.

2.1 | Foreign Lobbying Data

Enacted in 1938, FARA requires individuals acting as agents of foreign entities to disclose their domestic political activities to the Department of Justice in semi-annual reports, including lobbying (You 2020). Scholars have extracted from FARA reports valuable information about which US officials, including members of Congress, were targets of lobbying contact (You 2023; Liu 2022). Unfortunately, even the FARA data lack a crucial component for an ideal event analysis: the precise timing of lobbying contacts and detailed descriptions of their policy content. Without this information, it is impossible to attribute congressional lobbying systematically to SAPs or to the specific legislation they address.⁷ As a result, lobbying contacts disclosed under FARA cannot reliably be linked to particular bills or the SAPs that concern them.⁸

The very nature of the foreign lobbying data places some limits on the generalizability of any findings drawn from them. At the same time, foreign lobbying shares many structural characteristics with domestic lobbying: it is frequent, persistent over time, and broadly distributed across members of Congress (see Supporting Information: Part B.1 of Appendix B). These similarities suggest that foreign lobbying is not an idiosyncratic or marginal form of political activity, but rather one segment of a broader lobbying ecosystem that operates under comparable institutional constraints.

One important difference, however, is that foreign lobbying is dominated by governments, government-affiliated organizations, and trade promotion boards rather than by professional or issue-based associations typical of domestic lobbying. Prior research consistently distinguishes between two broad categories of foreign principals—phrased variously as governmental versus business (You 2020), governmental versus non-governmental (Freeman 2009), or public versus private (Lee 2020). Governmental entities indeed feature prominently in my data. Among the foreign principals most frequently lobbying Congress are the embassies or governments of Japan, Saudi Arabia, South Korea, and Qatar, as well as Northern Ireland's largest party, Sinn Féin. Also active are trade-promoting organizations with exceptionally strong state ties, such as the Korea International Trade Association, the Corporation for the Promotion of Exports and Investments of Ecuador, and the German Chamber of Commerce and Industry. These entities contrast sharply with domestic lobbying, where governmental clients are limited to US state and local governments (e.g., Goldstein and You 2017; Loftis and Kettler 2015). The business principals that do appear are often closely intertwined with state interests, including state-owned or government-linked enterprises such as NEOM Co. (developer of Saudi Arabia's planned city), Abu Dhabi Future Energy Company, and the Canadian Commercial Corporation.

This heavily governmental ecology has implications for how foreign principals engage with Congress. Foreign lobbying is likely to be especially responsive to foreign affairs legislation and, potentially, more sensitive to presidential actions than domestic lobbying—a pattern consistent with the “two presidencies” thesis (Wildavsky 1966). Moreover, unlike domestic interest groups, foreign principals cannot appeal to voters in lawmakers' districts or states. The absence of an electoral connection may grant foreign principals greater flexibility to adjust

their lobbying strategies in response to signals from the executive branch or shifting diplomatic priorities.

Importantly, however, these differences do not imply that foreign lobbying is uninformative about lobbying dynamics more generally. Rather, the logic underlying the analysis is consistent with broader theories of agenda-setting and signaling in American politics. Baumgartner et al. (2011), for example, show that interest groups increase their lobbying activity on issues emphasized by presidents in State of the Union addresses. Their findings suggest that presidents can signal priorities to the lobbying community at large, shaping how organized interests allocate their effort. The present study builds on this insight by leveraging FARA data to examine a narrower but more fine-grained setting—specific presidential positions on specific bills and subsequent lobbying plausibly related to those bills. While foreign and domestic lobbying differ in important respects, the evidence here is consistent with Baumgartner et al.'s (2011) broader implication—that lobbying activity responds systematically to presidential cues. In this sense, foreign lobbying provides a useful lens through which to observe underlying dynamics of responsiveness and strategic adaptation that are likely operative across the lobbying sector, whether foreign or domestic.

Thus, despite these limitations, I analyze the FARA data because they offer clear advantages over domestic LDA data. From the official website of the FARA Unit within the National Security Division of the US Department of Justice,⁹ I downloaded spreadsheets documenting contractual relationships between foreign clients (“foreign principals”) and their US-based representatives (“registrants”). These registrants include lobbying and public relations firms as well as US corporations established solely to represent specific foreign entities, whose employees are registered as “foreign agents.” Crucially, the DOJ spreadsheets contain URLs to all filings submitted under FARA, including supplemental statements detailing lobbying contacts conducted by foreign agents with the US government. After downloading all supplemental statements, I machine-read their full texts and sought to detect all instances of lobbying contact with congressional committees (typically committee staff) and members of Congress (including legislative office staff such as Chiefs of Staff, Legislative Directors, and Schedulers). I used contextual cues to filter out irrelevant mentions, such as campaign contributions.¹⁰ Details of data collection and preprocessing are described in Supporting information: Appendix A. My collection of FARA reports starts in 1995, as older reports are frequently too unclear to machine-read.

2.2 | Panel Analysis

Unable to link lobbying contact to SAPs, I employ a panel analysis approach in which I ask: how is lobbying of potential congressional targets during some standard period of time related to SAPs sent to them? I create three sets of panel data based on combinations of a lobbying target and a time period. These data sets are for three types of congressional targets: congressional committees, committee members, and members of Congress at large. Regarding the periods of time integral to panel data, their designation contains an element of satisficing at some expense of accuracy. Although foreign agents indicate

which 6-month period is covered by their supplemental statements, it can be any 6-month period. To form panel data, I convert the actually covered 6-month periods into standard ones of January to June and July to December (see Supporting Information: Appendix A). These standard January and July half-year periods constitute the time dimension of each data set.

I conduct panel analysis of the three data sets. For each official or institution, by period, I analyze how an aggregate measure of foreign lobbying received relates to an aggregate measure of SAPs received on bills being considered. In Supporting Information: Part B.1 of Appendix B, I summarize the amount of lobbying contact directed at each committee and member of Congress across half-year periods. These summary statistics show that lobbying contact is frequent, persistent over time, and widespread across many committees and lawmakers—though the two chambers' chief foreign relations committees are the only ones that see lobbying during every period without exception. The central question is whether SAPs account for lobbying more fully than the underlying legislative agenda does on its own; that is, do SAPs appear to drive lobbying in their own right rather than merely as a proxy for Congress's own power to create demand for lobbying (Baumgartner et al. 2011; Fagan and Furnas 2024)? To answer it, I analyze the amount of lobbying received by each congressional target as a function of SAPs while controlling for the legislative agenda itself. As detailed below, I measure the latter in two ways: the total number of relevant bills on the agenda and the number of highly significant bills on the agenda (the second a subset of the first).

A key limitation of this approach lies in the sequencing ambiguity inherent in FARA's semi-annual reporting structure. Because lobbying disclosures lack precise dates, it is impossible to determine whether lobbying preceded or followed a given SAP. Even when filings do reference SAPs, such mentions usually appear within broader issue discussions rather than as explicit citations. Aggregating lobbying and SAPs into 6-month periods, therefore, entails important tradeoffs for inference: while this design enables observation of broader patterns of coordination between presidential signaling and interest group activity, it also introduces temporal inaccuracy. Some lobbying may precede SAP issuance, and some SAP-driven lobbying may be diluted across the period or missed entirely. One potential correction is to attribute lobbying in period $t+1$ to SAPs issued in period t , thereby enforcing the temporal ordering of SAPs preceding lobbying. This adjustment, however, risks over-correction by linking lobbying to SAPs long predating it and omitting short-term reactions within the same reporting cycle.

Weighing these considerations, I retain the present approach of same-period aggregation but emphasize that it requires cautious interpretation. To the extent that some lobbying draws presidential attention (and SAPs) rather than the reverse—perhaps by making bills more partisan (see Garlick 2022)—the results should not be taken as causal. To the extent that the association reflects both lobbying and SAPs being jointly driven by the underlying legislative agenda, I address this possibility by explicitly controlling for congressional activity in the analysis. Despite these limitations, the panel design captures meaningful variation in the intensity and concentration of lobbying across committees and time periods, providing insight into how SAPs relate to foreign principals' strategic behavior and pointing

toward future research linking individual lobbying communications to specific presidential statements.

2.3 | Statements of Administration Policy (SAPs)

The main predictors in my analysis come from SAPs, obtained from the American Presidency Project.¹¹ From these SAPs, I extract the following pieces of information: the bill (in rare cases, multiple bills) they concern; the immediate intended audience, noted prominently at the beginning of SAPs, which may be the House Rules Committee, the House floor, the Senate floor, and the conference committee formed to reconcile House-Senate disagreements over passed bills; and the SAPs' dates of issuance. In Supporting Information: Part B.2 of Appendix B, I tabulate SAP issuance at both the committee and floor stages by bill topic. Consistent with existing research (Ostrander and Sievert 2022), many more SAPs come at the floor stage than at the committee stage of legislation, and SAP issuance has steadily declined over time (while perhaps becoming more strategic). This look also shows that foreign affairs bills constitute a fifth to a third of all SAP-drawing legislation, depending on the administration.

2.4 | Additional Information

My analysis requires other data on congressional legislation and on members of Congress. First is the scope of relevant legislation and its progression through Congress. That the data on lobbying contact come from FARA requires me to limit the legislation underlying the data to foreign relations bills. For this purpose, I use major topics of bills in the 93rd–116th Congresses as determined by the Congressional Bills Project, now part of the Comparative Agendas Project (CAP).¹² I restrict the main models to legislation in foreign affairs-related policy domains as coded by the CAP: immigration (major topic = 9), defense (16), foreign trade (18), and international affairs (19).¹³ This restriction is grounded in the logic and statute of FARA: because FARA requires disclosure only for lobbying done on behalf of foreign principals, the contact disclosed pertains to matters with international implications. While other policy domains—such as commerce, banking, or technology—have implications for foreign actors and therefore occasionally involve foreign lobbying, to include these domains broadly is to risk using coarse and oversized measures of the government agenda to explain just a small slice of the lobbying it motivates.¹⁴ To test the generality of this restriction, I conduct supplementary analysis including all SAP-drawing bills (rather than just foreign relations bills in the four listed areas), and find the key effects in the main analysis to be largely nonexistent (see Supporting Information: Part C.5 of Appendix C).

If bill topics set the scope of relevant legislation, the congressional legislative agenda tells us what legislation is considered and when: which bills are before Congress and its committees at any given time—or, in a panel analysis framework, during any 6-month period? I compile information on the legislative agenda based on ProPublica data,¹⁵ supplemented with the aforementioned GPO bill status data. I determine committee agendas by extracting, from these two data sources, records on when bills are referred to committees,

to which committees they are referred, and whether and when these bills are reported out of committees for possible consideration on the chamber floor. During a given half-year period, I consider a bill to be on a committee's legislative agenda if it is referred to or reported out of it during this period. I define the legislative agenda on the chamber floors to consist of bills that receive passage votes during a period.¹⁶

This definition of committee and floor agendas draws on insights from studies of congressional agenda setting. Lorenz (2020) models which introduced bills receive committee markups or reports as a function of lobbying, and acknowledges that his reliance on "newsworthy" bills rather than all bills raises concerns about selection on the dependent variable. Similarly, Peay (2021) shows that committee gatekeeping—the winnowing of proposals that reach the floor—is itself a political process. These studies suggest that a measure of committee agendas designed to explain lobbying contact should be *ex ante*, encompassing all referred bills rather than only those that advance. For floor agendas, restricting attention to bills that receive passage votes is appropriate because these are the proposals that have survived agenda control by the Speaker and the Rules Committee in the House (Cox and McCubbins 2005, 2007) or have obtained unanimous consent or won motions to proceed in the Senate (Den Hartog and Monroe 2011). Only on such bills is large-scale lobbying of rank-and-file members strategically meaningful.

My analysis also requires a definition of highly significant legislation: I aim to compare the explanatory power of SAP-drawing legislation with both the congressional agenda overall and its highly significant subset in predicting the amount of lobbying congressional targets receive. To define significant legislation, I start with the bills associated with key roll call votes listed in annual editions of the *CQ Almanac*. Because the *CQ* series ends in 2020, for the Biden years, I define highly significant bills as the top 10% most lobbied bills according to the domestic LDA data, compiled by the Center for Responsive Politics.¹⁷ The set of top-100 lobbying firms, useful for part of the analysis, also comes from the LDA data. The LDA data cap my analysis at 2022.

Finally, my analysis requires several characteristics of members of Congress. Most important is their committee assignments provided by Charles Stewart,¹⁸ which allows me to define the panel data on committee members. In addition, I collect legislators' party affiliation, ideology (the first dimension of their DW-NOMINATE scores provided by Voteview),¹⁹ and any party leadership positions they hold (the Speaker of the House and, in both chambers, the leaders and chief whips of the majority and minority parties). The party leadership information also comes from the Stewart data.

3 | Legislative Messages From Presidents and Lobbying Targets in Congress

Analysis of the three sets of political actor-period data described above shows a recurring pattern: SAPs are associated with significantly more lobbying of their audiences by foreign principals. The presentation of results starts with lobbying of congressional committees and their members and proceeds to lobbying of Congress members on the floor.

3.1 | SAPs to Congressional Committees and Lobbying

Recall that, in FARA reports, lobbyists disclose lobbying contact with both the congressional committee staff and the legislators serving on those committees on behalf of foreign principals; a complete picture of committee lobbying contains both types of contact. The data show that SAPs issued to a given committee are predictive of lobbying which targets that committee. I first present an analysis of lobbying committees as organizational entities (to test the Committee Hypothesis) and then of lobbying directed at specific members (to test the Committee Member Hypothesis).

3.1.1 | Lobbying Congressional Committees as Entities

In Figure 1, I show a group of scatter plots that visualize the relation between the number of bills on committees' legislative agendas that draw SAPs and the number of foreign principals lobbying those committees, for the three House committees and the three Senate committees that receive the most foreign lobbying, ranked according to the average number of lobbying organizations during a half-year period. Each point represents an observation of a half-year period in the data. These scatter plots show that the congressional committees of most interest to foreign entities—expected ones given their policy areas—tend to be more heavily lobbied when their legislative agendas contain more bills that draw SAPs. This pattern is most pronounced for the House Foreign Affairs Committee, the House Ways and Means Committee, and the Senate Foreign Relations Committee. It is weaker for Senate Appropriations and absent altogether for House Armed Services and Senate Finance.

It is important to take account of confounding factors likely underlying both SAPs and lobbying, such as bill salience, and to examine whether SAPs are positively related to lobbying across all committees and not just the top three in each chamber. For these reasons, I conduct regression analysis where I examine the relation between SAP-drawing bills and foreign lobbying activity but control for the two measures of committees' legislative agendas—the total number of foreign relations bills on the committee's agenda and the number of key bills on its agenda. Separately for House and Senate committees, I estimate panel models based on the data organized at the committee-period level, shown in Table 1. The models contain individual intercepts for each committee (i.e., committee-specific fixed effects) to take account of unobserved and time-invariant factors underlying the amount of lobbying different committees receive. The models also contain individual intercepts for each period (i.e., period-specific fixed effects) to take account of across-the-board factors of lobbying levels over time. The two sets of fixed effects make these models "within estimators" of SAPs' association with lobbying committees receive during a given period.

For both chambers, the first model (Models 1 and 4) uses only the number of SAP-drawing bills under consideration to explain lobbying. The second model (Models 2 and 5) controls for the total number of bills and the number of key bills to see whether SAPs are still predictive. The third model (Models 3 and 6) further controls for committee ideology, measured as the mean first dimension DW-NOMINATE score of the majority party contingent on each committee, rescaled relative

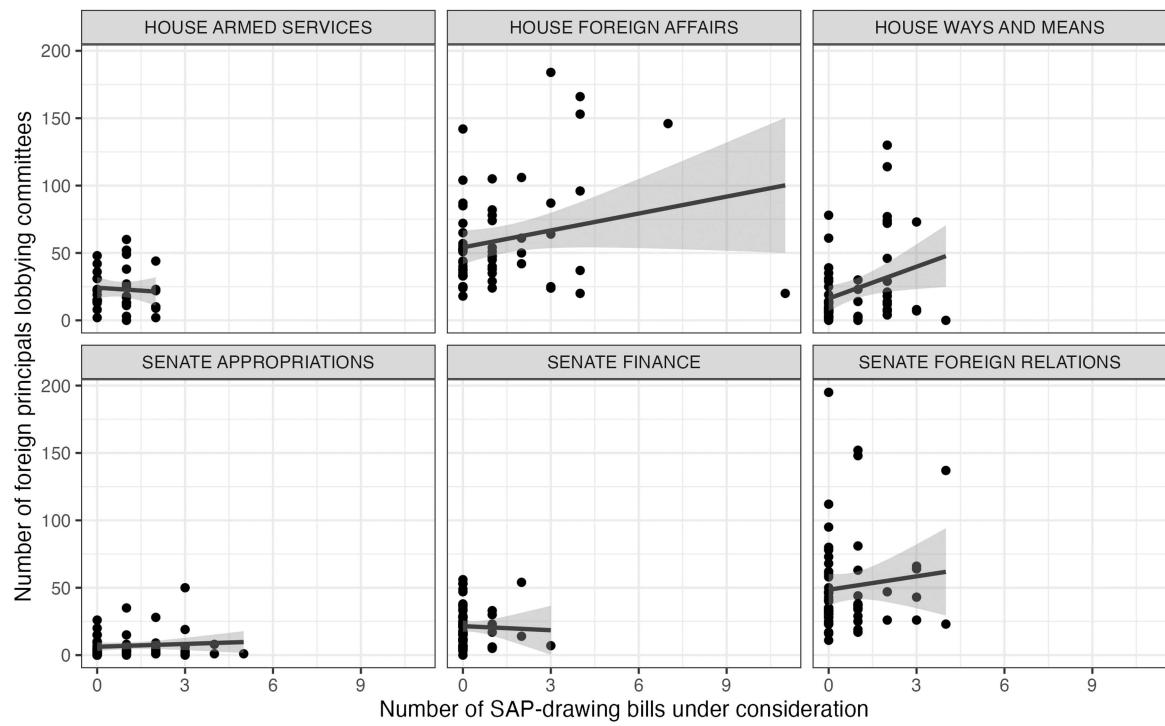


FIGURE 1 | SAP-drawing bills on committee agendas and lobbying of committees as entities.

TABLE 1 | Panel models of lobbying of congressional committees as entities by foreign principals.

	Dependent variable					
	Number of foreign principals lobbying committee					
	(1)	House (2)	(3)	(4)	Senate (5)	(6)
Number of SAP-drawing bills under consideration	1.68 [*] (0.88)	2.00 ^{**} (0.89)	1.84 ^{**} (0.89)	1.97 [*] (1.13)	1.91 [*] (1.14)	1.91 [*] (1.14)
Number of bills under consideration		0.002 (0.01)	0.001 (0.01)		0.01 (0.01)	0.01 (0.01)
Number of highly significant bills under consideration		-0.48 ^{**} (0.23)	-0.46 ^{**} (0.23)		0.07 (0.25)	0.06 (0.25)
Mean ideology of majority contingent			0.86 (0.71)			1.78 ^{**} (0.78)
Committee size			-0.24 ^{***} (0.09)			0.07 (0.17)
Constant	13.86 ^{***} (2.79)	13.91 ^{***} (2.79)	25.67 ^{***} (5.28)	3.80 [*] (2.28)	3.84 [*] (2.28)	2.96 (4.01)
Committee FEs	Y	Y	Y	Y	Y	Y
Period FEs	Y	Y	Y	Y	Y	Y
Observations	1424	1424	1424	1316	1316	1316
<i>R</i> ²	0.59	0.60	0.60	0.61	0.61	0.61
Adjusted <i>R</i> ²	0.56	0.56	0.57	0.58	0.58	0.58
<i>χ</i> ²	1285.00 ^{***}	1289.80 ^{***}	1298.71 ^{***}	1222.45 ^{***}	1223.68 ^{***}	1229.45 ^{***}

Abbreviation: FE, fixed effect.

^{*}*p* < 0.1; ^{**}*p* < 0.05; ^{***}*p* < 0.01.

to the president's party affiliation so that a more positive value indicates stronger alignment with the president's ideology. The ideology control is motivated by the possibility that foreign entities and their lobbyists may be more or less likely to lobby committees aligned with the president, especially when the president intervenes in legislation.²⁰ This model also controls for committee size: all else equal, larger committees conceivably both handle more legislation and get lobbied more simply because they are bigger targets.

The results show that SAP-drawing bills are predictive of lobbying irrespective of whether the model controls for committees' overall agendas or their most significant components. The two measures of committee agendas are unimportant alongside SAP-drawing bills, while committees whose majority contingents are ideologically aligned with the president are lobbied more in the Senate. In Supporting Information: Part C.1 of Appendix C, I adopt an alternative approach to comparing the three measures' explanatory power: using each one to predict lobbying without controlling for the other two but alongside the ancillary controls, and inspecting both the coefficient estimates and model statistics—the Akaike information criterion (AIC) and the Bayesian information criterion (BIC). Both AIC and BIC evaluate model fit while penalizing complexity, with lower values indicating that a model achieves a better balance

between explanatory accuracy and parsimony (Burnham and Anderson 2002). Supporting Information: Table A6 shows that the SAP measure is the only positive and significant predictor and that the AIC/BIC of that model is the lowest for the Senate and one of the two lowest for the House. These results therefore support the Committee Hypothesis.

3.1.2 | Lobbying Members of Congressional Committees

Are SAPs also related to lobbying contact disclosed in FARA reports directed at individual committee members? Again, I use a series of parallel regression models to examine the explanatory power of SAP-drawing foreign relations bills in relation to the number of foreign principals that lobby committee members. The results are shown in Table 2. For each chamber, the first model contains just SAP-drawing bills, the second model controls for the two alternative measures of committee agendas, and the third model adds four other controls—whether legislators are members of foreign affairs committees (House Foreign Affairs and Senate Foreign Relations), whether they are in the chamber's majority party, whether they are members of the president's party, and their first-dimension DW-NOMINATE scores (rescaled in the president's direction). Each model also contains fixed effects for legislators and half-year periods.

TABLE 2 | Panel models of lobbying of congressional committee members by foreign principals.

	Dependent variable					
	Number of foreign principals lobbying committee member					
	(1)	House	(2)	(3)	(4)	Senate
Number of SAP-drawing bills under consideration	2.17*** (0.19)	1.84*** (0.19)	1.53*** (0.19)	1.36** (0.31)	1.00*** (0.33)	0.64* (0.33)
Number of bills under consideration		0.01*** (0.001)	0.01*** (0.001)		0.01*** (0.002)	0.005** (0.002)
Number of highly significant bills under consideration		0.26*** (0.04)	0.12*** (0.04)		0.19*** (0.07)	0.17** (0.07)
Member of foreign affairs committee				10.41*** (0.29)		2.53*** (0.43)
Member of chamber majority				-0.43*** (0.14)		-0.13 (0.20)
Member of president's party				-1.15*** (0.37)		-1.50*** (0.49)
Ideology				0.89** (0.42)		1.06* (0.62)
Constant	35.53*** (4.23)	35.09*** (4.23)	36.18*** (4.17)	49.15*** (3.62)	49.10*** (3.62)	49.65*** (3.63)
Legislator FE	Y	Y	Y	Y	Y	Y
Period FE	Y	Y	Y	Y	Y	Y
Observations	49,880	49,880	49,880	23,348	23,348	23,348
R ²	0.36	0.36	0.38	0.44	0.44	0.44
Adjusted R ²	0.34	0.35	0.36	0.43	0.43	0.44
χ^2	22386.18***	22597.92***	23960.36***	13621.96***	13648.95***	13705.60***

Abbreviation: FE, fixed effect.

* $p < 0.1$; ** $p < 0.05$; *** $p < 0.01$.

Consistent with the earlier analysis of committees as entities, the analysis of lobbying received by committee members shows that SAP-drawing bills are strongly predictive of the amount of lobbying, including when the two measures of committee agendas are accounted for. In contrast to the earlier analysis, all three measures are significant and positive in their own right, each contributing to the variation in lobbying received. Yet, the number of SAP-drawing bills is the most sizable predictor. These results support the Committee Member Hypothesis. Foreign affairs committee members are unsurprisingly lobbied much more frequently than other lawmakers. Within Supporting Information: Part C.1 of Appendix C, Table A7 shows that, without controlling for the other two, the SAP measure still has the largest effect of the three measures for both the House and the Senate. The model's overall explanatory power according to AIC/BIC, however, is best for the House but worst for the Senate.

To visualize the association between SAP-drawing bills on committee agendas and the number of foreign principals lobbying committee members, I show a pair of predicted values plots in Figure 2 based on Models 3 and 6. I select two of the most frequently lobbied members of key foreign relations committees, chosen based on the average number of foreign principals that lobby them during each Congress—Rep. Young Kim of California (a member of the House Foreign Affairs Committee since 2021) and Sen. Lindsey Graham of South Carolina (a member of the Senate Foreign Relations Committee from 2019 to 2020). For them, I contrast the predicted number of foreign principals in correspondence to the number of significant under committee consideration and, separately, to the number of SAP-drawing bills—holding the other count (and the total bill count) at their means. I hold both legislators to be in the foreign affairs committees, the chamber majority, and the president's party. For both legislators, SAP-drawing bills have a stronger positive association with lobbying received, though this contrast is more pronounced for Graham.

3.2 | SAPs to the Congressional Floor and Lobbying of Legislators

Does the statistical link between SAPs on legislation and lobbying extend from the committee room onto the congressional floor? To see if it does, I analyze data that combine information on bills receiving passage votes in the chamber, legislation that draws floor-targeting SAPs, and lobbying activity targeting legislators. The results show that SAPs are on the whole positively related to lobbying of legislators as they are to committees and committee members, but are also related to lobbying in a more subtle manner predicted earlier. SAPs are associated with a concentration of lobbying onto elite lobbying firms (top-100 by annual revenue) at the expense of firms outside the top ranks.

Starting with the broad pattern, I conduct regression analysis of the legislator-period data to examine how SAPs sent to the floor are related to foreign lobbying. In this analysis, shown in Table 3, I do not control for period-specific fixed effects as was done for the committee and committee member analysis; this is because the main predictors of interest—the legislative agenda and bills drawing SAPs—do not vary from legislator to legislator within the same half-year period in the legislator-period data. Including period fixed effects would make it impossible to estimate these legislator-invariant predictors' effects. Of course, the outcome of lobbying received does vary among legislators, and I again use legislator fixed effects to control for unobserved and time-invariant factors underlying how much each legislator gets lobbied. As the unavailability of period fixed effects precludes controlling for secular change in the level of foreign lobbying over time, I opt to estimate regression models separately by president, unlike in the previous analysis; this narrows the temporal scope of each model and thus decreases the amount of change in foreign lobbying over time to be explained. Under each president, any across-the-board changes should be modest, making the absence of period fixed effects less consequential for the regression estimates.

Besides the main predictor of SAP-drawing legislation, each model also controls for the other two measures of the floor

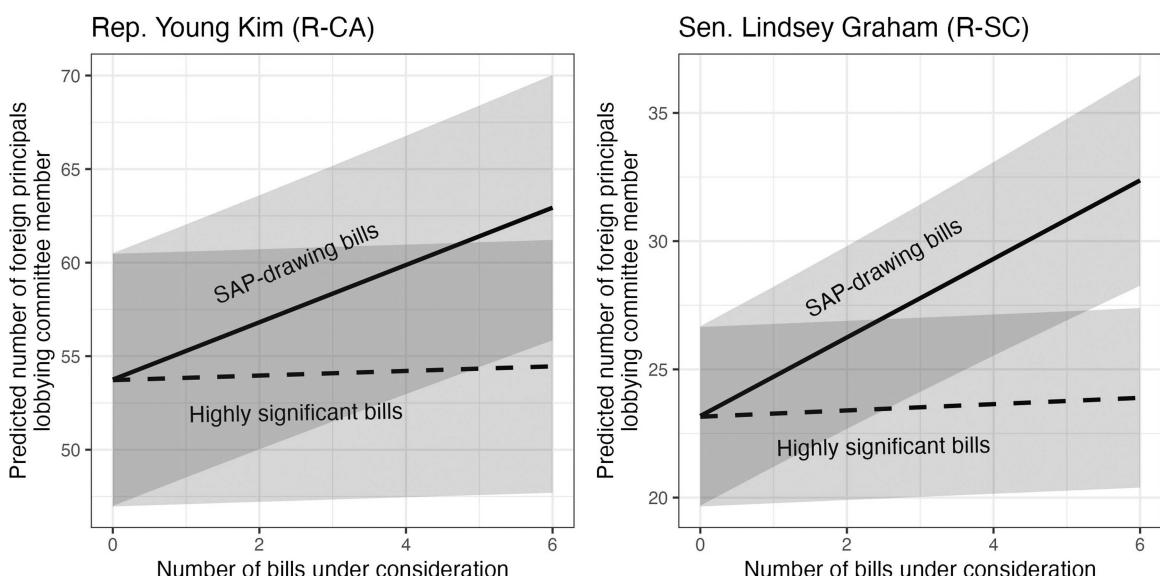


FIGURE 2 | SAP-drawing bills on committee agendas and predicted amount of lobbying of congressional committee members.

TABLE 3 | Panel models of lobbying of members of Congress by foreign principals.

	Dependent variable									
	Number of foreign principals lobbying legislator									
	Clinton		G.W. Bush		Obama		Trump 1		Biden	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Number of SAP-drawing bills on agenda	-0.31*** (0.04)	-0.31*** (0.04)	0.10*** (0.04)	0.13*** (0.04)	1.18*** (0.05)	1.19*** (0.05)	1.55*** (0.06)	1.55*** (0.06)	0.34*** (0.13)	0.34*** (0.13)
Number of bills on agenda	0.19*** (0.02)	0.19*** (0.02)	-0.03** (0.01)	-0.02** (0.01)	0.11*** (0.01)	0.11*** (0.01)	-0.08*** (0.01)	-0.07*** (0.01)	0.04*** (0.01)	0.04*** (0.01)
Number of highly significant bills on agenda	-1.66*** (0.06)	-1.63*** (0.06)	0.08** (0.03)	0.07** (0.03)	-0.38*** (0.05)	-0.37*** (0.05)	0.15*** (0.05)	0.15*** (0.05)	0.71*** (0.10)	0.71*** (0.10)
Member of foreign affairs committee		0.72 (0.51)		0.69* (0.38)		1.32*** (0.40)		0.83* (0.48)		0.00 (0.60)
Member of president's party		-4.09 (17.20)		-0.36 (5.67)		25.39 (21.41)		-193.73*** (68.18)		-62.40 (39.40)
Member of chamber majority		-5.09 (6.26)		-0.03 (0.18)		-0.26 (0.20)		0.12 (0.25)		
Ideology		-2.78 (17.48)		-6.36 (4.67)		7.23 (17.58)		181.07*** (62.94)		-93.43* (49.19)
Leader		-3.68* (2.10)		7.49*** (1.08)		6.45*** (1.92)		-1.68 (2.42)		-2.58 (5.38)
Senator		-4.38*** (1.22)		10.07*** (0.90)		4.52*** (0.78)		2.67 (1.98)		30.40*** (7.04)
Constant	9.52** (4.05)	12.28 (11.69)	7.46*** (2.61)	3.10 (3.01)	13.25*** (2.64)	-7.55 (11.49)	1.29 (4.54)	120.36*** (41.68)	0.15 (2.99)	26.59* (15.75)
Legislator FE	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Observations	15,132	15,132	21,788	21,780	20,980	20,980	10,676	10,668	5280	5280
R ²	0.40	0.40	0.26	0.26	0.43	0.43	0.64	0.64	0.78	0.78
Adjusted R ²	0.38	0.38	0.23	0.24	0.41	0.41	0.61	0.61	0.76	0.76
Residual standard error	11.43	11.43	10.41	10.37	10.52	10.51	9.05	9.05	7.95	7.95
F Statistic	14.16***	14.14***	9.97***	10.25***	18.33***	18.36***	26.44***	26.35***	30.70***	30.64***

* $p < 0.1$; ** $p < 0.05$; *** $p < 0.01$.

agenda. For each presidency, the second model also controls for whether the legislator sits on a foreign affairs committee, whether she is a member of the president's party, whether she is a member of the chamber majority party (unavailable for the one Congress under Biden as it is in exact agreement with membership in the president's party), whether she is a party leader in the chamber, her ideology measured with their DW-NOMINATE scores, and a binary indicator that switches on for Senators and off for Representatives.²¹ For all administrations in the data except Clinton's, SAP-drawing bills are a significant positive predictor of lobbying contact, consistent with the expectation that SAPs motivate lobbying activity. The other two measures of the floor agenda are positive in some presidencies and negative in others. According to Supporting Information: Table A8 in Part C.1 of Appendix C, the SAP model performs best for the Bush, Obama, and Trump presidencies but not for Biden, while each measure of the floor agenda is a positive predictor of lobbying on its own. Notwithstanding these qualifications, the results by and large support the Floor Hypothesis. That the Senator indicator is usually strongly significant invites

separate analysis by chamber, which I conduct in Supporting Information: Part C.3 of Appendix C. It shows that SAP effects on lobbying are bicameral from Obama to Biden, but driven by the House under Bush.

What to make of the exception of the Clinton presidency, during which SAP issuance is associated with lower foreign lobbying of Congress, in contrast to the positive associations observed under other presidents? One possible explanation is that SAPs were more frequent and less selectively issued during Clinton's tenure, whereas presidents beginning with George W. Bush appear to have become more discerning in their use of SAPs. This pattern is consistent with recent research showing that the number of SAPs dropped sharply after Clinton (Ostrander and Sievert 2022), a decline that is also evident in my data (see Supporting Information: Part B.2 of Appendix B). Greater selectivity may have amplified the mobilizing effect of SAPs under later presidents: by targeting fewer, higher-priority bills, SAPs became more salient signals for interest groups and legislators, thereby increasing the likelihood of lobbying responses.

Moreover, Clinton's SAPs contained relatively few objections compared to the more sharply targeted statements issued by George W. Bush and likely subsequent presidents (Ainsworth et al. 2014), suggesting that many Clinton SAPs functioned more as formal signals than as strong cues for action. Second, during the 104th–106th Congresses, the House was firmly under Republican control, led by Speaker Newt Gingrich, creating a predictable legislative environment in which a Democratic president faced a cohesive opposition party. Under these conditions, issuing numerous SAPs that raised few objections would have provided little new information or pressure for foreign principals to lobby Congress. In contrast, the post-Clinton decline in SAP frequency and increase in selectivity may have made each statement a more potent mobilizing signal, enhancing lobbying responses.

3.2.1 | SAPs and the Stratification of Lobbying Representation

Earlier, I laid out reasons to expect SAPs not just to raise the overall level of lobbying in Congress, but to have a concentrating effect on lobbying done by elite firms. I put this Stratification Hypothesis to test by changing the outcome variable from the number of foreign principals that lobby each legislator to the number of top-100 firms and non-top-100 firms, respectively, that represent these foreign principals.²² In Figure 3, I show scatter plots visualizing the correlation between SAP-drawing foreign relations bills on the congressional floor with these two lobbying firm counts, selecting the three most lobbied members of each chamber who held office during at least three Congresses. A bifurcated pattern is evident: SAPs are generally positively related to lobbying by top

firms but negatively related to lobbying by non-top firms, a pattern clearest for Rep. Mast and the Senators.

I again turn to regression analysis to examine whether the bifurcated pattern is present systematically in the data. In Table 4, I show results of regression analysis that uses the number of SAP-drawing foreign relations bills on the congressional floor to explain the number of top-100 lobbying firms and non-top 100 firms that lobby legislators, again separately for each president, and again controlling for the other two bill counts. Comparing the two models during each presidency shows that the bifurcation seen in Figure 3 persists but in a weaker form. For the Obama and Trump presidencies, SAP-drawing bills are positively related to lobbying advocacy by top firms but not to advocacy by non-top firms. For Clinton and Bush, SAP-drawing bills are more positively related to advocacy by top firms than to that by non-top firms, with a statistically significant difference between the two effects.²³ The Biden presidency emerges as a clear exception: both non-top and top firm participation is positively related to the number of SAP-drawing bills and to a statistically indistinguishable degree.

I visualize the effects of SAP-drawing bills on the two types of lobbying in Figure 4 based on each presidency's most lobbied member of Congress. In Supporting Information: Part C.4 of Appendix C, I show supplementary regression analysis where I model the proportion of lobbying firms that consists of top-100 firms as a function of the same set of predictors.²⁴ It shows that the number of SAP-drawing foreign relations bills on the congressional floor is positively related to top firms' proportion under all five presidents, consistent with—and somewhat stronger than—the main results above. These results support the Stratification Hypothesis.

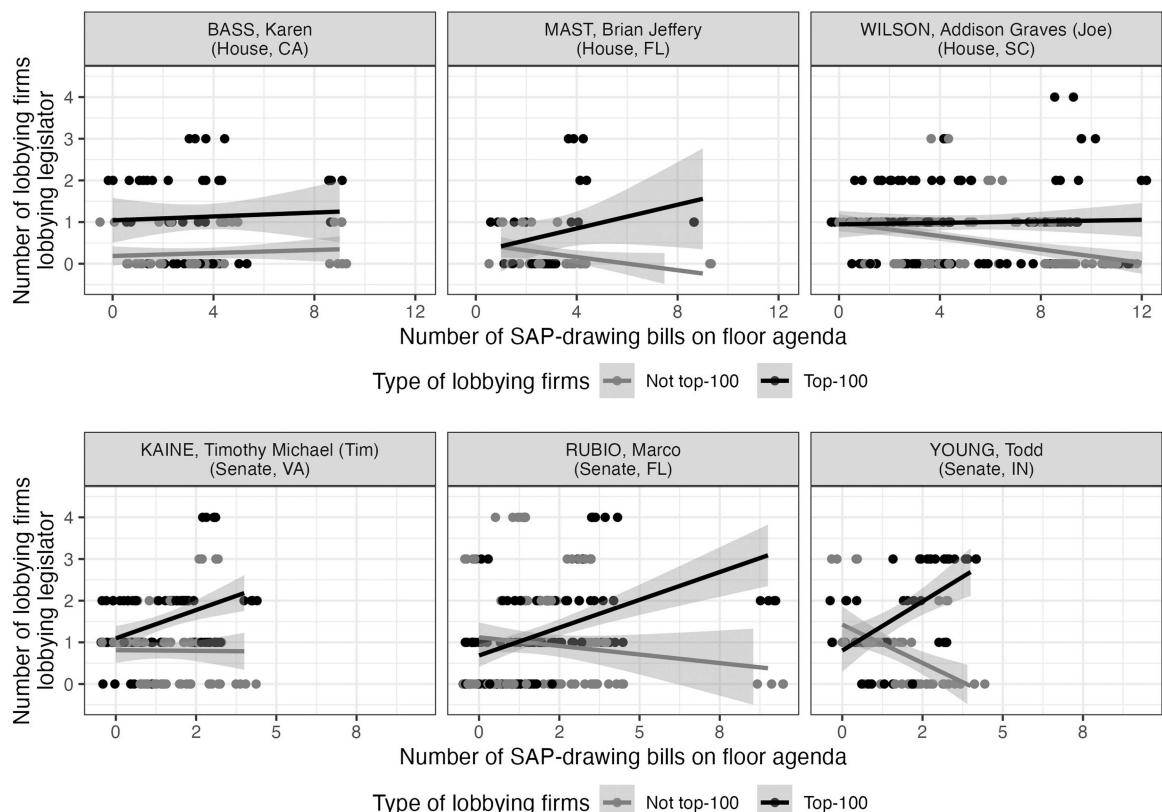


FIGURE 3 | SAP-drawing bills on congressional floors and lobbying of legislators by top and non-top lobbying firms.

TABLE 4 | Panel models of lobbying of members of Congress by top and non-top lobbying firms.

	Dependent variable									
	Clinton		G.W. Bush		Obama		Trump 1		Biden	
	Non-top (1)	Top (2)	Non-top (3)	Top (4)	Non-top (5)	Top (6)	Non-top (7)	Top (8)	Non-top (9)	Top (10)
Number of SAP-drawing bills on agenda	0.003*** (0.0004)	0.02*** (0.001)	0.01*** (0.001)	0.02*** (0.002)	-0.005*** (0.002)	0.07*** (0.002)	-0.002 (0.002)	0.09*** (0.004)	0.06*** (0.01)	0.05*** (0.01)
Number of bills on agenda	-0.001*** (0.0002)	-0.01*** (0.0004)	-0.003*** (0.0003)	-0.01*** (0.0005)	0.002*** (0.0004)	0.01*** (0.001)	-0.001*** (0.0003)	-0.01*** (0.001)	-0.002*** (0.0004)	-0.002*** (0.001)
Number of highly significant bills on agenda	0.002*** (0.001)	0.02*** (0.002)	0.001 (0.001)	-0.004*** (0.001)	-0.001 (0.002)	-0.03*** (0.002)	0.01*** (0.002)	0.04*** (0.004)	0.01* (0.004)	-0.01** (0.01)
Member of foreign affairs committee	0.001 (0.01)	-0.01 (0.01)	0.01 (0.01)	0.02 (0.02)	0.01 (0.01)	0.04** (0.02)	0.01 (0.01)	0.03 (0.03)	-0.00 (0.03)	0.00 (0.04)
Member of president's party	-0.01 (0.17)	-0.14 (0.45)	0.01 (0.14)	0.05 (0.27)	-1.60** (0.66)	-1.95** (0.93)	-0.28 (2.06)	-4.36 (4.42)	-3.79** (1.66)	-2.02 (2.48)
Member of chamber majority	0.003 (0.06)	0.04 (0.16)	-0.02** (0.005)	-0.05*** (0.01)	-0.02*** (0.01)	0.01 (0.01)	0.01 (0.01)	0.12*** (0.02)		
Ideology	-0.01 (0.18)	-0.18 (0.45)	-0.05 (0.12)	-0.22 (0.22)	-1.49*** (0.55)	-2.01*** (0.76)	0.26 (1.90)	3.81 (4.08)	-5.05** (2.07)	-2.53 (3.10)
Leader	-0.003 (0.02)	0.03 (0.05)	0.04 (0.03)	0.25*** (0.05)	0.17*** (0.06)	-0.22*** (0.08)	-0.11 (0.07)	-0.18 (0.16)	-0.50** (0.23)	0.13 (0.34)
Senator	0.03** (0.01)	0.17*** (0.03)	0.08*** (0.02)	-0.03 (0.04)	0.28*** (0.02)	0.27*** (0.03)	0.09 (0.06)	-0.01 (0.13)	0.45 (0.30)	0.98** (0.44)
Constant	-0.01 (0.12)	-0.04 (0.30)	0.03 (0.08)	0.24* (0.14)	0.84** (0.36)	0.89* (0.50)	0.19 (1.26)	2.56 (2.70)	1.81*** (0.66)	1.02 (0.99)
Legislator FEs	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Observations	15,132	15,132	21,780	21,780	20,980	20,980	10,668	10,668	5280	5280
R ²	0.20	0.21	0.23	0.22	0.25	0.31	0.26	0.47	0.51	0.42
Adjusted R ²	0.16	0.17	0.20	0.19	0.21	0.28	0.21	0.43	0.46	0.36
Residual Standard error	0.12	0.30	0.26	0.49	0.33	0.46	0.27	0.59	0.33	0.50
F Statistic	5.09***	5.37***	8.53***	7.87***	7.81***	10.79***	5.29***	13.11***	8.96***	6.28***

Abbreviation: FE, fixed effect.

* $p < 0.1$; ** $p < 0.05$; *** $p < 0.01$.

Furthermore, in Supporting Information: Part C.2 of Appendix C, I conduct the same type of analysis for the committee stage and find mixed evidence of bifurcation: it characterizes lobbying of Senate committees as entities (Supporting Information: Table A9) and of House committee members (Supporting Information: Table A10) but not the other cases. In summary, SAPs are associated with lobbying's stratification throughout the congressional process, though more strongly on the floor—in support of the Stage Dependency Hypothesis about SAPs' stratifying effect.

4 | Conclusion and Discussion

When presidents intervene in the congressional lawmaking process with SAPs, they immediately accomplish several things. They mark the targeted bills as part of their legislative agendas

(Kernell 2023; Guenther and Kernell 2021). They announce their perception of the bills as not only important but sufficiently likely to survive Congress to warrant presidential action (Ostrander and Sievert 2022). And by explaining their support or opposition to the bills, they coordinate allies and opponents in Congress around the same terms of debate (Kernell 2023). Besides their immediate congressional audiences, all these messages conveyed by SAPs are valuable to interest groups that engage with Congress closely. Groups have incentives to lobby on highly partisan, highly important bills on the president's agenda due to the existence of many available allies (Nicoll Victor 2007; Furnas et al. 2019; Koger et al. 2009; Mahoney and Baumgartner 2015). And groups benefit from cues from the president on which members of Congress to lobby and how. Left undiscussed so far, SAPs may also stimulate lobbying through a more direct channel: by signaling which bills are

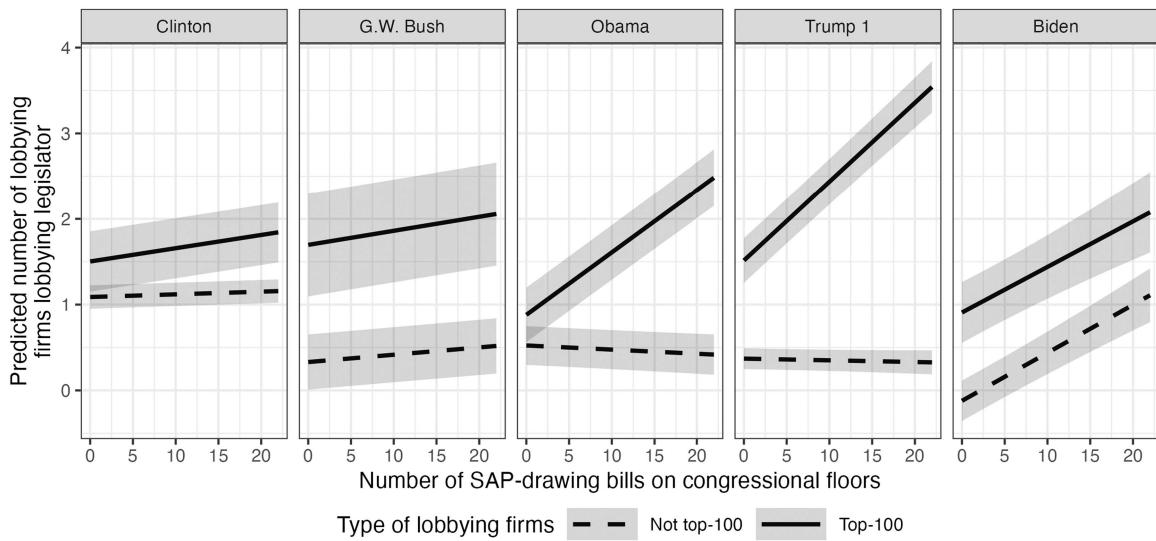


FIGURE 4 | SAP-drawing bills on congressional floors and predicted number of lobbying firms lobbying legislators.

likely to advance through Congress. Presidents are more likely to weigh in on bills that are important and plausibly passable (Ostrander and Sievert 2022). Interest groups face similar strategic incentives: they seek to invest their finite resources in legislation that has a realistic chance of enactment, and thus follow the president's signal of bill viability. But even if SAPs themselves are issued in response to bills' underlying viability, they can still shape lobbying by publicly affirming that viability to organized interests.

Informed by the theory, I test whether SAPs appear to send organized interests lobbying the receiving committees and lawmakers and concentrate lobbying among elite lobbying firms. The results support these expectations and highlight how interest groups and lobbyists may act as intermediaries between the executive and legislative branches and amplify presidential signals. Thus, it extends theories of elite signaling by suggesting how a well-studied form of presidential communication to Congress can reverberate through the broader policy ecosystem to mobilize outside actors and, through it, draw congressional responses. It suggests a link between SAPs and the broader literature on presidential communication strategies. In a limited sense, SAPs reflect Kernell (1997) logic of "going public": they seek to exert indirect pressure on Congress by activating actors outside the legislature. Unlike traditional public appeals that mobilize mass opinion through the media, however, SAPs operate through elite networks, galvanizing organized interests that can translate presidential preferences into targeted lobbying. They thus represent a quieter, more technocratic form of going public—an "inside strategy" that channels influence through Washington's lobbying infrastructure rather than public spectacle.

Analogous to "going public," recognizing SAPs as elite-oriented signaling also invites consideration of when presidents choose *not* to issue them. If SAPs are a restrained form of going public, their absence can be equally strategic. Because public appeals can harden opposition and limit bargaining (Kernell 1997), semi-public signals like SAPs may carry similar risks. Presidents may therefore practice strategic silence—

deliberately withholding an SAP to avoid external pressure and preserve negotiating flexibility. Issuing an SAP thus entails a tradeoff between signaling resolve and maintaining deniability, illustrating how presidents manage legislative relations through selective communication.

Finally, this study has important limitations. First, it warrants repetition that despite the causal flow the theory implies, the empirical analysis stops short of demonstrating causality from SAPs to lobbying (see Garlick 2022). The aggregation-by-period approach underlying my data structure permits causation to flow in both directions. Future research can potentially tease apart the two causal directions by separately analyzing the lobbying effect of SAP-drawing bills that originate from presidents' previously formulated agendas—perhaps during the campaign or in State of the Union addresses—and that of SAP-drawing bills without known prior presidential stances. It can also do so through in-depth looks at the sequencing of bill introduction, SAP issuance, and lobbying in cases where detailed lobbying contact—complete with timing and purpose—is thoroughly documented.

Second, this study leaves unaddressed what is likely a critical component of presidential influence on lobbying: unilateral power. Executive orders, presidential memoranda, and proclamations also name audiences (usually executive agencies). Via comparable mechanisms, unilateral power flags targeted agencies as objects of lobbying for organized interests with stakes in the implementation of presidential directives. Compared to SAPs, unilateral power is much more effective in immediately inducing policy outcomes without going through the trouble of interbranch lawmaking (Lowande and Rogowski 2021); these special properties of unilateral power imply an even stronger effect on lobbying than legislative intervention, which ultimately consists of attempts at persuasion and not command. Finally, as discussed earlier, the focus on foreign relations legislation may make SAPs appear especially influential, consistent with the well-known "two presidencies" thesis (Wildavsky 1966). If presidential influence is strongest in foreign affairs, then the policy scope of this study represents a most-likely case for detecting SAP effects.

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Conflicts of Interest

The author declares no conflicts of interest.

Data Availability Statement

The data and codes necessary to reproduce the results of this article are available for public access in the Harvard Dataverse at <https://doi.org/10.7910/DVN/CVYCYV>.

Endnotes

¹<https://www.presidency.ucsb.edu/documents/statement-administration-policy-hr-6156-russia-and-moldova-jackson-vanik-repeal-act-2012>.

²<https://www.reuters.com/article/world/russian-delegation-hits-washington-to-lobby-against-magnitsky-sanctions-idUSBRE86B05I/>.

³<https://www.imrussia.org/en/world/337-congress-and-the-kremlin-magnitsky-act-on-its-way-to-final-passage>.

⁴For example, the material at <https://efile.fara.gov/docs/6869-Informational-Materials-20230317-755.pdf> refers to an SAP supporting the repeal of Iraq War authorizations.

⁵In Supporting Information: Part B.2 of Appendix B, which contains descriptive statistics referenced below, I do disaggregate foreign affairs bills by SAP message type.

⁶In LDA reports, lobbyists only state which federal agencies they lobby and whether they lobby the two chambers of Congress. But these reports do not detail which members or committees of Congress get lobbied.

⁷Semi-annual FARA “supplemental statements,” which require foreign agents to disclose lobbying contacts, ask: “During this 6-month reporting period, have you on behalf of any foreign principal engaged in political activity?” Although the Department of Justice’s current template encourages registrants to specify dates and purposes of political activities, most filings omit these details. The latest version of the supplemental statement requests activity dates for “arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts,” but notably not for lobbying contacts such as meetings with members of Congress.

⁸In contrast, the domestic Lobbying Disclosure Act (LDA) requires lobbyists to report the specific bills and policy issues involved, but these data do not identify the lobbying targets.

⁹<https://www.justice.gov/nsd-fara>.

¹⁰The supplemental statement includes a separate question about campaign contributions (see Liu 2022). By excluding responses to that question and examining surrounding text, I distinguish records of lobbying contact from campaign contributions.

¹¹<https://www.presidency.ucsb.edu/>.

¹²<http://www.congressionalbills.org/>.

¹³As this data set ends with the 116th Congress, for bill topics in the 117th Congress I turn to the Government Publishing Office’s bill compilation (<https://www.govinfo.gov/bulkdata/BILLSTATUS>).

¹⁴Moreover, to the extent that commerce policy might have foreign affairs implications, CAP codes this policy area as domestic commerce, emphasizing its primarily internal economic focus and making it less relevant to foreign lobbying.

¹⁵<https://projects.propublica.org/datastore/#congressional-data-bulk-legislation-bills>.

¹⁶In the ProPublica data, the “vote” action type, accompanied by either an “voice vote” annotation or Y-N roll results, identifies passage votes. In the GPO data, the legislative “action codes” for passage votes include: in the House, 8000 (passed/agreed to in House), 9000 (failed of passage/not agreed to in House), H37100 (on passage/on agreeing to the resolution), H37300 (on passage/on agreeing to the resolution on suspension of the rules); and in the Senate, 17000 (passed/agreed to in the Senate), 18000 (failed of passage/not agreed to in Senate).

¹⁷<https://www.opensecrets.org/bulk-data/download?f=Lobby.zip>.

¹⁸House data: <https://dataverse.harvard.edu/dataset.xhtml?persistentId=doi:10.7910/DVN/XLIHUC>; Senate data: <https://dataverse.harvard.edu/dataset.xhtml?persistentId=doi:10.7910/DVN/EQ.6KC7>.

¹⁹<https://voteview.com/data>.

²⁰Using the mean ideology score of the whole committee makes little difference for the results.

²¹A few members of Congress lack ideology scores because of lack of roll call voting records and are thus dropped from the full models.

²²This threshold balances statistical power with the empirical regularity that firm revenue drops off steeply beyond the top 100. The top-100 is also a common threshold for the most dominant firms and interest groups (e.g., Drutman et al. 2019).

²³Using a stacked regression with outcome-specific legislator fixed effects, I test for equality of the coefficient on “Number of SAP-drawing bills on agenda” across the two outcomes. The stacked specification jointly estimates both equations on the same sample and allows all coefficients to vary by outcome. A Wald test of the cross-equation difference in the key predictor’s coefficient rejects equality ($p < 0.001$ for both presidencies; see Greene [2018, Chapter 10] on seemingly unrelated regressions and cross-equation hypothesis testing).

²⁴Due to the proportional nature of the outcome variable, this analysis is limited to legislator-period observations where there is a nonzero amount of foreign lobbying.

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Supporting Information

Additional supporting information can be found online in the Supporting Information section.

[3_supplemental_R1](#).