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 Washington, DC 20510

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 SECRETARY OF THE SENATE  
 00 AUG 28 AM 11:1

# LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page

1. Registrant Name <b>University of Puerto Rico, Office of the President</b>	
2. Address <input type="checkbox"/> Check if different than previously reported <b>P.O. Box 364984 San Juan, PR 00936-4984</b>	
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country): _____	
4. Contact Name <b>Anne L. Howard-Tristani</b>	Telephone <b>(787) 250-0000 x-2051</b>
5. Senate ID # <b>39518-12</b>	
7. Client Name <input type="checkbox"/> Self	6. House ID # <b>33170000</b>

8. Year 2000 Midyear (January 1-June 30)  OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report  Termination Date \_\_\_\_\_

11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13	
<p>12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> \$ _____  <small>Income (nearest \$10,000)</small></p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p>13. Organizations</p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input checked="" type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> \$ _____  <small>Expenses (nearest \$20,000)</small></p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature Anne L. Howard-Tristani

Printed Name and Title Anne L. Howard-Tristani, Special Assistant to the President and Director, Office of Federal and External Affairs

LD-1 (REV. 6/93)

PAGE 1 of 1

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AUG 28 AM 11:16  
Office of  
Public Records

August 24, 2000

Office of the Secretary  
Office of Public Records  
United States Senate  
Hart Building, Suite 232  
Washington, DC 20510-7716



Dear Sir:

This letter will provide an explanation for the delay in our submitting the 1998-1999 Lobbying Report(s) to your office, on behalf of the University of Puerto Rico (UPR), as required under the U.S. Lobbying Disclosure Act of 1995.

According to notices received by the UPR Office of Federal and External Affairs, we are past due in submitting the following four reports: "1998 Year End Report;" the "1999 Mid-Year Report;" the "1999 Year End Report" and the "2000 Mid-Year Report." The reasons for the delay in submission of the above referenced reports are explained below.

**Background:**

- First, as the Special Assistant to the UPR President and as Director of the Office of Federal and External Affairs (OFEA), I have responsibility for overseeing the professional services of Washington, D.C. consulting firms which undertake U.S. federal agency and congressional relations work (direct lobbying activities) on behalf of the UPR. Each of these firms (*Van Scoyoc and Associates and Dow, Lohnes & Albertson*) submitted both Semi Annual and Year-End Reports for 1998 and 1999 on behalf of the UPR (see copies attached).

Since the UPR-OFEA, which is located within the Office of the President of the University of Puerto Rico, has a very limited staff, the majority of our governmental and congressional relations work is carried out directly by representatives of consulting firms in Washington, D.C. retained by the UPR. Due to the continuing shortage of administrative and secretarial staff in our office and the fact that I, must travel for the University's federal and external affairs outreach programs, approximately 75 percent of my time, we have not been able to submit our reports to your office on a regular basis. In addition, due to the turnover in our professional staff this past year (Deputy Director re-assigned and new OFEA Associate Director for Federal Affairs only hired in August 1999), I was frankly not aware that we were late in submitting our reports.

Also, it is important to stress that our new staff, both professional and administrative staffs were completely unfamiliar with the lobbying registration forms and the due dates.

[Redacted]  
TO: Sen. [Redacted]  
FROM: [Redacted]  
DATE: 8/24/00



*Office of the Secretary*  
*Page 2*  
*August 24, 2000*

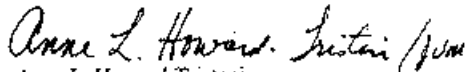
- Second, during the period of February-May 2000, I was hospitalized and on medical leave from the UPR. I was, therefore, unable to provide any guidance to our OFEA administrative and secretarial staff in the office on the content and procedures to be followed in submitting past due Lobbying registration forms. Since the OFEA professional staff were new, they did not have the necessary information to complete the reports during this period.
- Third, unfortunately, the UPR-OFEA has not had Administrative support staff nor an Associate Director for Federal Affairs, whose primary responsibility is to ensure the timely submission of the Lobbying Report(s) during the past two fiscal years. Previously, during the period of 1995-1998, this was the responsibility of the OFEA's last two Deputy Directors, whose position is now vacant. Please be assured that the UPR-OFEA will establish and implement the necessary administrative procedures to ensure that the reports are filed on time, even when there has not been any lobbying activity for the period reported.

Preparation of the draft reports will now be the responsibility of the Associate Director for Federal and External Affairs (Mrs. Juanita Valentin-Morris), so that the OFEA Director can submit the reports during the required reporting periods. The OFEA Administrative Secretary, Ms. Carmen Jarvis-Brookes, will assist her in meeting the required filing deadlines.

I trust that the above explanations will satisfy any questions you have regarding the delay in submission of our Lobbying Reports. Should you have any additional questions, please contact me directly or my Associate Director, Mrs. Juanita Valentin-Morris, at (787) 250-0000 or 765-5610, extensions 2015 or 2051.

Thank you in advance for your assistance.

Sincerely,



Anne L. Howard-Tristani  
Special Assistant to the President and Director  
Office of Federal and External Affairs

cjb

Enclosures

c Mrs. Juanita Valentin-Morris  
Ms. Carmen Jarvis-Brookes