ARTIFICIAL INTELLIGENCE LOBBYISTS DESCEND ON WASHINGTON DC

An analysis of the state of lobbying on artificial-intelligence related issues.

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ACKNOWLEDGMENTS

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Introduction and Key Findings

Technological advancements in artificial intelligence (AI) prompted an influx of lobbying activity in recent years on AI-related issues. The impacts of implementing AI-based technologies have rippled out across a broad spectrum of industries beyond just the technology sector. As the implementation of this technology grows increasingly widespread, stakeholders have ramped up their engagement with policymakers. The federal government and AI companies themselves have recognized the need to develop regulations,1 and in turn, lobbyists have approached AI policy as a “goldmine” for profits, prompting them to take on clients with interests in the space.2

Public Citizen examined the rapidly developing lobbying landscape around AI-related issues to report on how key industries and entities – through their immense lobbying power – are seeking to influence AI regulations.

We analyzed five years of data (2019 to 2023) from the House lobbying disclosure database3 to determine which corporations, trade groups and other organizations lobbied explicitly on AI as well as other AI-related topics, including autonomous vehicles, facial recognition, and other closely related AI issues (hereinafter AI-related issues).4

Compiling this data revealed a growth in the number of clients, lobbying organizations, and individual lobbyists engaging on AI-related issues, and the disparate range of industries these issues touch. Using this data, we also examined which agencies in the federal government clients and their lobbyists targeted the most on AI-related issues.

Among other things, our report found that:

- Corporations, trade groups and other organizations sent more than 3,400 lobbyists to lobby the federal government on AI-related issues in 2023, a 120 percent leap from 2022.

- AI is not just an issue of concern for AI and software corporations: While the tech industry was responsible for the most AI-related lobbyists in 2023 – close to 700 – the total amounts to only 20 percent of all the AI-related lobbyists deployed. Lobbyists from a broad distribution of industries outside of tech engaged in AI-related issues, including financial services, healthcare, telecommunications,

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4 See Methodology
transportation, and defense.

- Clients lobbying on AI-related issues sent more than 1,100 lobbyists to lobby the White House in 2023, nearly twice as many as devoted to any particular federal agency. The number of lobbyists hired to lobby the White House on AI-related issues grew from 323 in the first quarter to 931 by the fourth quarter, a 188 percent increase within that single year.

- 85 percent of the lobbyists hired in 2023 to lobby on AI-related issues were hired by corporations or corporate-aligned trade groups. The Chamber of Commerce was responsible for the most AI-related lobbyists, 81, followed by Intuit (64), Microsoft (60), the Business Roundtable (42), and Amazon (35).

A previous report by OpenSecrets highlighted the spike in newcomers lobbying on AI, revealing that more than 330 entities lobbied on AI-related issues in 2023 after not engaging with the federal government on the issue in 2022. OpenSecrets found that groups that lobbied on AI in 2023 spent a total of $957 million lobbying the federal government on all issues that year.

Many of the top general spenders on lobbying have engaged on AI issues as well: out of the top 20 overall spenders on lobbying, Public Citizen found that 15 of those entities lobbied on AI, reflecting how organizations with the most resources have vast lobbying power to shape regulations surrounding the use of AI.

Our findings reveal that lobbyist engagement on AI policy dramatically increased in recent years in response to both the rapid development and implementation of AI-based technologies and the White House’s release of its Executive Order on AI in October 2023.

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6 Id.


I. Lobbying on AI-Related Issues Exploded in 2023

Public Citizen analyzed lobbying data over the last five years and collected a set of lobbying activities that included keywords related to artificial intelligence. Our findings show that after four years of similar levels of AI-related lobbying, a sharp increase occurred last year. An analysis of the clients revealed that while many clients resided in the tech industry, they still only made up 16% of all clients by industry. Other clients come from a broad array of industries, demonstrating how widespread the impact of AI technologies has become. Outside of Congress, the White House was bombarded with almost twice as many lobbyists as any other federal agency.

The Number of Lobbyists Hired by Clients to Lobby on AI-Related Issues Increased by 120 Percent From 2022 to 2023

Public Citizen’s research found that while the number of corporations, trade groups, and other organizations lobbying on AI-related issues remained relatively steady from 2019 to 2022, a steep increase in 2023 brought the number of lobbying clients up to 566 (Figure 1). This growth reflected a 108 percent increase from the 272 clients engaged on AI issues in 2022.

Figure 1 – Number of Clients Lobbying on AI-Related Issues by Year
The number of lobbyists hired to lobby on AI issues also increased sharply in 2023. In 2023, clients hired a combined total of 3,410 lobbyists to lobby on AI-related issues, which represents an increase of 120 percent from 2022 (1,552) (Figure 2).

Figure 2 – Number of Lobbyists Hired by Clients to Lobby on AI-Related Issues by Year

The lobbyist totals in Figure 2 include each unique client lobbyist relationship – not each unique person. Lobbying clients will often hire the same people resulting in the same person being counted multiple times (when Apple and Oracle both hire the same person to lobby for example, that person would be counted twice in our totals). In terms of unique individuals, there were 2,136 lobbyists hired to lobby on AI-related issues in 2023.

Lobbyist engagement is likely to continue to rise in 2024 as federal agencies work to enact the actions directed by the Biden administration’s executive order on implementing “safe, secure, and trustworthy artificial intelligence”\(^9\) and Congress considers an array of legislative proposals related to AI.\(^10\)

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17 Different Industries Lobbied on AI-Related Issues. The Tech Industry was Most Active, But Still Only Accounts for 20 Percent of Lobbyists

Within the AI-related lobbying dataset that Public Citizen collected, we assigned each client to an industry to examine various sectors’ involvement in AI policies and lobbying. Advancement of AI technology impacts not only the technology sector but the nature of work and labor, civil rights and liberties, our democracy, economic opportunities, and more. Various sectors have also recognized AI’s potential impacts on housing, healthcare, financial services, media and entertainment, education, national security, and more. The breadth of industries heavily lobbying on AI is striking.

After assigning each client to a single industry, we grouped the set of 566 clients from 2023 into 17 separate industries. While some clients could appropriately be assigned to more than one industry, we chose the primary industry a lobbying client operates within.

Our industry breakdown of the AI lobbying landscape revealed that while tech companies were in the lead in terms of the number of clients and the lobbyists they hired to meet with policymakers, the tech sector only made up about 16% of all clients that lobbied on AI-related issues and their lobbyists made up about 20% of all lobbyists that lobbied on AI-related issues. Our analysis found that 99 tech clients lobbied on AI-related issues and hired a combined total of 699 lobbyists in 2023 (Table 1).

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11 Rose Khattar, Will AI Benefit or Harm Workers?, CENTER FOR AMERICAN PROGRESS (Aug. 24, 2023), https://www.americanprogress.org/article/will-ai-benefit-or-harm-workers/.
Table 1 – Clients and Lobbyists Engaging on AI-Related Issues in 2023
Categorized by Industry

<table>
<thead>
<tr>
<th>Industry</th>
<th>Clients</th>
<th>Lobbyists</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech</td>
<td>99</td>
<td>699</td>
</tr>
<tr>
<td>Advocacy</td>
<td>63</td>
<td>425</td>
</tr>
<tr>
<td>Financial Services</td>
<td>53</td>
<td>383</td>
</tr>
<tr>
<td>Education</td>
<td>53</td>
<td>156</td>
</tr>
<tr>
<td>Transportation</td>
<td>52</td>
<td>285</td>
</tr>
<tr>
<td>Media</td>
<td>43</td>
<td>235</td>
</tr>
<tr>
<td>Defense/Security</td>
<td>30</td>
<td>168</td>
</tr>
<tr>
<td>Healthcare</td>
<td>28</td>
<td>179</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>28</td>
<td>237</td>
</tr>
<tr>
<td>Services/Product Retail</td>
<td>23</td>
<td>125</td>
</tr>
<tr>
<td>Pharmaceuticals</td>
<td>23</td>
<td>139</td>
</tr>
<tr>
<td>Consulting</td>
<td>21</td>
<td>87</td>
</tr>
<tr>
<td>Telecommunication</td>
<td>15</td>
<td>140</td>
</tr>
<tr>
<td>Labor/Trade Union</td>
<td>12</td>
<td>79</td>
</tr>
<tr>
<td>Research</td>
<td>9</td>
<td>23</td>
</tr>
<tr>
<td>Utilities/Natural Resources</td>
<td>8</td>
<td>33</td>
</tr>
<tr>
<td>Government</td>
<td>6</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>566</strong></td>
<td><strong>3,410</strong></td>
</tr>
</tbody>
</table>

Behind the tech sector, organizations that worked on advocacy or research were second with 63 clients that hired a total of 425 lobbyists to engage on AI-related issues. Financial services ranked third with 53 clients engaging on AI-related issues by hiring lobbyists. In that same year, large financial firms such as JPMorgan Chase, Morgan Stanley, Citi, and Visa all announced efforts to introducing generative AI products to their internal operations, clients, or both.18

The transportation sector, which ranked sixth for having the most clients lobby on AI-related issues, has engaged heavily on policies regarding autonomous vehicles. Lobbying groups backed by big tech and self-driving car companies, such as the Chamber of Progress, are pushing for expanded regulatory exemptions to enable the widespread deployment of autonomous vehicles.19

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In the defense sector, 30 clients hired a combined total of 168 lobbyists to work on AI issues. Given the U.S. Department of Defense and military’s growing interest in AI, defense companies that are often major government contractors have been increasingly implementing AI for military applications.\(^{20}\) Earlier this year, the U.S. Navy awarded Anduril Industries a contract to develop AI-powered underwater vehicles for defense and commercial purposes.\(^{21}\) Anduril was among the top 20 clients sending the most lobbyists on AI-related issues in 2023. Last year the Defense Department released an updated strategy for AI adoption on the heels of the White House’s executive order.\(^{22}\) The strategy describes how the Defense Department will prioritize faster delivery and adoption of AI to support its operations, which will likely increase incentives even more for contractors to develop and offer AI capabilities, and in August 2023 the Pentagon announced a major new program, the Replicator Initiative, that aim to rely heavily on autonomous drones to combat Chinese missile strength in a theoretical conflict over Taiwan or at China’s eastern coast.\(^{23}\)

In total, 12 of the 17 industries we investigated each hired at least 125 lobbyists to lobby the government on AI-related issues.

**Corporations, Trade Groups, and Other Organizations Deployed More Than 1,100 Lobbyists to the White House in 2023 to Influence AI Policy**

Public Citizen also investigated which departments of the federal government lobbyists targeted to discuss AI policies. Excluding the Senate and House of Representatives, we found that the White House was the most lobbied entity of the federal government, attracting 1,117 hired lobbyists in 2023 (Table 2). In total, 17 different federal agencies plus the White House were lobbied by at least 100 lobbyists that lobbied on AI-related issues in 2023.

<table>
<thead>
<tr>
<th>Rank</th>
<th>Agency</th>
<th>Number of Lobbyists</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>U.S. SENATE</td>
<td>3,314</td>
</tr>
<tr>
<td>2</td>
<td>U.S. HOUSE OF REPRESENTATIVES</td>
<td>3,283</td>
</tr>
<tr>
<td>3</td>
<td>White House</td>
<td>1,117</td>
</tr>
<tr>
<td>4</td>
<td>Dept of Commerce</td>
<td>574</td>
</tr>
</tbody>
</table>


When analyzing lobbying activity over the last five years, we observed that lobbying of the White House remained consistently the highest (Figure 3). The number of lobbyists reporting they lobbied the White House rose dramatically in each quarter of 2023: in the first quarter, 323 lobbyists reported that they lobbied the White House on AI-related issues. By the fourth quarter that number was 931, a 188 percent increase. A sharp rise in 2023 coincided with the release of the Biden administration’s executive order on AI, which consequently led to an increase in lobbying not only of the White House but of other agencies as well, given the executive order’s directives for other departments.

For example, the executive order tasked the Department of Commerce with “establish[ing] guidelines, standards, and best practices for AI safety and security” by acting through the Director of the National Institute of Standards and Technology (NIST) and coordinating with other appropriate agencies.

In early 2024, the Commerce Department started to require AI developers whose models pose national security issues to disclose information such as safety test results before releasing their AI models.

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The Department of Health and Human Services (HHS) has been tasked with establishing an AI Task Force to “develop a strategic plan” on the “responsible deployment and use of AI and AI-enabled technologies in the health and human services sector,” which includes research and discovery, drug and device safety, healthcare delivery and financing, and public health.27 In response, HHS gathered a task force while the Centers for Medicare and Medicaid Services (CMS) and the HHS Office for Civil Rights are exploring AI regulations and governance.28

As federal agencies move forward with developing guardrails for AI technologies, stakeholders will likely rely even more on their lobbyists to shape how AI policy is formed.

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II. Corporate America Looks to Control AI Policy

Corporate interests are dominating lobbying on AI issues. Even in cases where at first glance a lobbying entity may not appear to be representing corporate interests, digging deeper into partnerships and collaborations revealed that non-profit interests are often deeply intertwined with corporate ones as well.

85 Percent of AI Lobbyists in 2023 Represented Corporate Interests

Out of all the lobbyists hired to lobby on AI-related issues in 2023, 85 percent represented corporate interests, meaning, for example, they were lobbying on behalf of corporations or corporate-aligned trade groups. Only five of the top 50 lobbying entities responsible for the most AI-related lobbyists in 2023 were not representing corporate interests. Two of the five were large hospitals – the Mayo Clinic and The New York and Presbyterian Hospital – while the other three were the AFL-CIO, AARP, and the National Fair Housing Alliance. None of the five were in the top ten (Table 3).

Table 3 – Clients That Hired the Most Lobbyists to Lobby on AI in 2023

<table>
<thead>
<tr>
<th>Rank</th>
<th>Lobbying Client</th>
<th>Lobbyists</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Chamber of Commerce</td>
<td>81</td>
</tr>
<tr>
<td>2</td>
<td>Intuit, Inc. and Affiliates</td>
<td>64</td>
</tr>
<tr>
<td>3</td>
<td>Microsoft Corporation</td>
<td>60</td>
</tr>
<tr>
<td>4</td>
<td>Business Roundtable</td>
<td>42</td>
</tr>
<tr>
<td>5</td>
<td>Amazon</td>
<td>35</td>
</tr>
<tr>
<td>6</td>
<td>Information Technology Industry Council</td>
<td>33</td>
</tr>
<tr>
<td>7</td>
<td>ADOBE INC</td>
<td>31</td>
</tr>
<tr>
<td>8</td>
<td>American Property Casualty Insurance Association</td>
<td>30</td>
</tr>
</tbody>
</table>

29 2023 4th Quarter Lobbying Report, CHAMBER OF COMMERCE OF THE U.S.A (2023),
https://lda.senate.gov/filings/public/filing/e9c4f686-fd97-4e73-9e82-0f3eb707c287/print/.
30 2023 4th Quarter Lobbying Report, INTUIT, INC. AND AFFILIATES (2023),
https://lda.senate.gov/filings/public/filing/f1c8719a-9d7a-4a0c-98e0-cf0dc34aca40/print/.
31 2023 4th Quarter Lobbying Report, MICROSOFT (2023),
32 2023 4th Quarter Lobbying Report, BUSINESS ROUNDTABLE (2023),
33 2023 4th Quarter Lobbying Report, AMAZON (2023),
https://lda.senate.gov/filings/public/filing/cfba1d3c-fb67-43a9-895a-7f3dc5a83491/print/.
34 2023 4th Quarter Lobbying Report, INFORMATION TECHNOLOGY INDUSTRY COUNCIL (2023),
https://lda.senate.gov/filings/public/filing/646af42f-ef2b-4235-98fa-03cda519663/print/.
35 2023 4th Quarter Lobbying Report, ADOBE INC (2023),
https://lda.senate.gov/filings/public/filing/d040b88e-2bb1-45cd-8d1b-9ec9ab03defc/print/.
36 2023 4th Quarter Lobbying Report, AMERICAN PROPERTY CASUALTY INSURANCE ASSOCIATION (2023),
https://lda.senate.gov/filings/public/filing/57a97b0b-09ba-4bbd-b073-28d6f71d336d/print/.
Even when a client’s lobbying efforts might not appear to be driven by corporate interests on the surface, corporate deals and partnerships may present a conflict of interest. For example, the non-profit Mayo Clinic signed a deal with Google in 2023 to pilot and use its AI-based tools capable of passing medical licensing exams, scouring medical records, and “help[ing] doctors diagnose diseases and evaluate treatment options.” This is not the first time the clinic partnered with Google on AI. In 2019, Mayo signed a 10-year strategic partnership with Google to use Google’s cloud platform as “the cornerstone” of the hospital’s “digital transformation,” which includes, among other things, the increased use of AI.

Conclusion

The AI lobbying landscape has expanded to include stakeholders from far more sectors than just the tech industry. The immense involvement in AI policies from the wide range of industries reflects how AI technologies are impacting all aspects of society. Powerful corporate interests are pouring resources into shaping AI policy. And the data show that they are likely having a disproportionate influence on how laws governing the use of AI will develop in the U.S.

The U.S. federal government should remain wary of corporate interest engagement with the process. AI guardrails are essential to protect the public and the voices of stakeholders that represent them must also be heard loudly in the halls of government.

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Methodology

Public Citizen gathered all lobbying disclosures filed from 2019 to 2023 and collected disclosures that listed artificial intelligence or artificial intelligence-related keywords as lobbied issues. These keywords included: “artificial intelligence,” “(AI),” “autonomous,” and “facial recognition.” The data was then cleaned to remove any false matches.

To obtain a count of lobbyists, we counted each unique client lobbyist relationship once – not each unique person. If the same individual lobbyist appeared in our dataset as having lobbied for multiple lobbying clients, we counted each instance as one given that we counted the number of lobbyists hired, and not the number of unique individual lobbyists.

To obtain the number of lobbyists that lobbied a federal agency, we counted each lobbyist hired by each client that lobbied a federal agency within a set time frame once. While lobbying disclosures must include the agencies lobbied, there is a mix of whether disclosers list a department (for example, the Department of Health and Human Services), or an agency within the department (for example, the Centers for Medicare and Medicaid Services). Therefore, we grouped every entity under the department it operates within. If a lobbyist hired by the same organization appeared on multiple disclosures having lobbied both HHS and CMS within a year, our analysis would group all those encounters together and count it as one.