

Policy Alert

Updates to the Lobbying Disclosure Act Guidance

December 20, 2011

On December 15, 2011, the Clerk of the House of Representatives and the Secretary of the Senate issued revisions to the Lobbying Disclosure Act Guidance. The revised guidance will likely **not** impact most clients. While most of the revisions are not substantive and are merely grammatical in nature, two are worth pointing out.

In Section 5, under the heading “Elaboration on the Definition of Client,” the guidance now incorporates long-standing verbal guidance from the Clerk and Secretary on the proper listing of a client’s name when work is performed on behalf of third parties. As an example, if a lobbying firm “L” is being subcontracted by lobbying firm “F” on behalf of client “P,” lobbying firm “L” would disclose on its registration “F on behalf of P” as the client and “P” as the affiliate on Line 13 of Form LD-1.

In Section 6, under the heading “Disclosing that a Client is a State or Local Government or Instrumentality,” the guidance now states that if “the client is a state or local government or instrumentality, check the box on Line 7 of Form LD-2.” Previously, the guidance incorrectly instructed that a nonexistent box on Form LD-1 also be checked.

CONTACT INFORMATION

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