Wiley Rein LLP

ELECTION LAW NEWS

Developments in All Aspects of Political Law | September 2016

Pence Brings Pay-to-Play into Presidential Race

By D. Mark Renaud Michael E. Toner

When Republican presidential nominee Donald Trump named Indiana Governor Mike Pence to his ticket in July, Pence brought the federal pay-to-play rules with him. Under the U.S. Securities and Exchange Commission's pay-to-play rule for investment advisers, the Municipal Securities Rulemaking Board's Rule G-37 for municipal advisors and broker dealers underwriting municipal bonds, and the U.S. Commodity Futures Trading Commission's swap dealer regulation, Governor Pence is a covered government official. This means that a non-de minimis contribution to him and the Trump/Pence ticket could cost an investment adviser, broker dealer, swap dealer, or other investment professional a current contract with certain Indiana agencies or preclude such persons from contracts for the next two years. All of the agencies have made clear over the years that the federal rules apply both in state and local elections, as well as in federal elections when covered state officeholders are running. As a result, all of these entities and their employees must be vigilant with respect to any such contributions. Depending on the rule involved, contributions from $250 to $350 may be made without negative effect since all citizens are eligible to vote for the Vice President.

Most persons outside the financial services industry are free to contribute what they want, but Indiana does have its own state pay-to-play rules applicable to certain vendors to the State Lottery Commission, and this prohibition has a lengthy look-back period for which contributions can affect procurements. The law may not be applicable here, but Indiana's law and other laws like it around the country must be kept in mind when developing compliance processes related to state and local contributions and engaging in state and local government procurement activities. ■

For more information, please contact:

D. Mark Renaud
202.719.7405
mrenaud@wileyrein.com

Michael E. Toner
202.719.7545
mtoner@wileyrein.com

FEC Commissioners Disagree on Whether to Limit Political Activities of Foreign-Owned U.S. Subsidiaries

By Andrew G. Woodson

In a contentious Federal Election Commission (FEC or Commission) meeting earlier this month, the FEC's Republican and Democratic commissioners sparred over three separate proposals designed to address the potential flow of foreign money into U.S. elections. The debate at the September 15th meeting was certainly high on media-worthy rhetoric, but there also were many important substantive points for campaign finance practitioners to take away from the discussion and the underlying proposals.

continued on page 2

ALSO IN THIS ISSUE

continued from page 1

The genesis for the debate occurred on August 9, when Democratic Commissioner Ann Ravel called upon her colleagues to prohibit U.S. subsidiaries of foreign parents from participating in federal, state, or local elections – either directly or through a corporate political action committee (PAC) – even when decisions about political spending are made by American citizens. Commissioner Ravel's motion specifically requested that the FEC rescind a 2006 advisory opinion issued to TransCanada Corporation, a Canadian entity that garnered national attention for its efforts to build the Keystone XL crude oil pipeline. (The Obama administration ultimately rejected the project late last year.) In the 2006 opinion, the FEC recognized that TransCanada's two wholly owned U.S. subsidiaries could themselves contribute to state and local candidates – where permissible under applicable law – when the contributed funds (1) "derive entirely from funds generated by the Subsidiaries' U.S. operations;" and (2) "all decisions concerning the donations and disbursements will be made by individuals who are U.S. citizens or permanent residents, except for setting overall budget amounts." Commissioner Ravel's proposal also targeted a second advisory opinion for repeal, issued to Mercedes-Benz USA in 2009, that formally extended the rationale of the TransCanada opinion to permit foreign-owned U.S. subsidiaries to establish an employee PAC. These two opinions were themselves grounded in several decades of earlier precedent approving such practices.

The theory underlying Commissioner Ravel's proposal appears to have been that even though Americans are the ones making the decisions about who the U.S. subsidiary and/or its PAC should be supporting, principles of corporate law dictate that the subsidiaries' decisions will be made with the foreign parents' interests in mind. Commissioner Ravel also posited that the issue of foreign influence is more acute now than ever before because the Supreme Court's *Citizens United* decision, combined with rulings from lower federal courts, have made the "American campaign finance system . . . vulnerable to influence from foreign nationals and foreign corporations through [d]omestic subsidiaries and affiliates in ways unimaginable a decade ago."

Commissioner Ravel's concerns ultimately failed to persuade her Republican colleagues, with her proposal rejected by a 3-3 vote. While Republicans had substantive objections to limiting American workers' rights to participate in the political process, Commissioner Ravel's proposal also faced procedural and other challenges. For example, an FEC regulation prohibits reconsideration of an advisory opinion more than thirty calendar days after its issuance, and Commissioner Ravel's motion was coming ten years after-the-fact. Moreover, when this concept was previously debated during a 2002 rulemaking, some questioned the constitutionality of discriminating against the First Amendment rights of U.S. employees based on the foreign ownership of their domestic employer.

Apart from Commissioner Ravel's motion, Democratic Commissioner Ellen Weintraub released her own proposal in advance of the meeting calling on her colleagues to commence a broader rulemaking on foreign money. Among other items, Commissioner Weintraub proposed an examination of the following concepts:

- Whether "U.S. corporations that reincorporate in other countries to avoid U.S. taxes should retain the ability to spend in U.S. elections;"
- The "possibly divided loyalties of both U.S. based companies with global assets and foreign companies with U.S. subsidiaries;" and
- A possible certification requirement where corporations affirmatively certify "that no foreign money was spent on U.S. political activity."

Ultimately, Commissioner Weintraub's proposal was also defeated on a 3-3, party-line vote. But perhaps even more important than her actual proposal, however, was a key observation that Commissioner Weintraub made during the meeting. Despite decades of precedent clearly permitting such activity, Commissioner Weintraub warned that the public should know that there is "no longer a consensus, no longer can we get four votes to give safe harbor for the political activities of domestic subsidiaries." Given this statement, it will be very interesting to see what happens in future enforcement matters involving U.S. subsidiaries of foreign parents.

continued on page 10

Corporations Score Partial Victory in Kentucky Contributions Case

Corporate support for PACs permitted, corporate contributions still prohibited

By Jan Witold Baran and Eric Wang

Corporations recently scored a partial victory in federal court by securing the right to pay for the administrative costs of their Kentucky state PACs using corporate funds. However, the decision did not strike down altogether Kentucky's ban on corporations using their general treasury funds to make contributions directly to candidates for state office. Instead, the court ordered the ban on corporate contributions to be extended to unions and limited liability companies (LLCs) as well. The ruling, which reflected a settlement agreement between the plaintiff in the case and the Kentucky Registry of Election Finance (KREF), made permanent a preliminary injunction that had been issued in March of this year.

Corporate Contribution Ban Upheld; Corporate Support for PACs Clarified

The disposition of the case did not give Protect My Check, Inc., an incorporated 501(c)(4) advocacy group that brought the challenge, everything it was looking for. The primary relief the plaintiff sought was a ruling invalidating Kentucky's prohibition against corporate contributions as an unconstitutional infringement of corporations' First Amendment rights.

Joining several other federal courts that have ruled on this issue, Judge Gregory F. Van Tatenhove of the U.S. District Court for the Eastern District of Kentucky held that the Supreme Court's 2010 *Citizens United* decision did not invalidate the Supreme Court's 2003 *FEC v. Beaumont* decision. According to Judge Van Tatenhove, *Beaumont* upheld the constitutionality of the federal ban on corporate contributions to federal candidates, provided that corporations are still allowed to administer a PAC and to contribute to candidates through such a PAC.

Judge Van Tatenhove acknowledged that *Citizens United* invalidated several of the rationales for the corporate contribution ban – namely, that such a ban prevents corporations from distorting the political process and protects shareholders. However, he reasoned that *Citizens United* did not disturb the corporate contribution ban as a permissible means of preventing "*quid pro quo* corruption."

While upholding Kentucky's corporate contribution ban, Judge Van Tatenhove's final order provided that corporations must be permitted "to administer a state PAC and contribute to state candidates through that PAC in a manner consistent with [*FEC] v. Beaumont*." As the KREF confirmed in a memo to the public issued on July 21, shortly after the judge's final order was entered, "Corporations may sponsor and administer a state Permanent Committee and pay the state PAC's administrative expenses from corporate funds," and unions and LLCs also "may sponsor and administer a state PAC, and pay the state PAC's administrative expenses from union or LLC Funds."

This clarifies the uncertain regulation of corporate support for state PACs that had existed previously under the Kentucky statute and KREF guidance – an ambiguity that was noted in the litigation. While the KREF represented in the case that, after the 2010 *Citizens United* decision, the agency no longer prohibited corporations from paying for their PACs' administrative costs, as recently as 2014, the KREF still maintained in an advisory opinion that a corporation's PAC must reimburse the corporation for administrative costs, and a PAC guidance manual that remains on the KREF's website took the same position.

Leveling the Playing Field: Disparate Treatment of Corporations and Unions Invalidated

In another partial victory for the plaintiff, which supports "right to work" laws that are anathema to unions, the final court order extends Kentucky's prohibition against corporate contributions to include also contributions made by unions and LLCs. The KREF had previously interpreted the law to permit contributions by unions and LLCs. Judge Van Tatenhove's decision held that such disparate treatment was unsupported by any evidence that political contributions from corporations pose any greater threat of corruption than contributions from unions and LLCs. According to the ruling, this "arbitrary" legal distinction violated corporations' right to equal protection of the laws under the Fourteenth Amendment.

continued on page 8

Campaign Finance Reform on the Ballot in Several States This November: Missouri, South Dakota, Washington

By Carol A. Laham and Stephen J. Kenny

There are a number of prominent campaign finance ballot measures that will be before the voters in November. Below are summaries of three of the most significant ones.

Missouri

Missouri voters are expected to vote on a proposed constitutional amendment establishing campaign contribution limits and banning contributions from certain entities, such as corporations and labor unions. Since 2008, Missouri has had no contribution limits, and the state permits corporate and union contributions. The constitutional amendment would limit contributions to candidates to $2,600 per election and limit contributions to political parties to $25,000. In addition to banning corporate and union contributions, the law would prohibit PAC-to-PAC transfers and would require out-of-state PACs to register in Missouri before making contributions.

The ballot measure has already been challenged in court. Last month, a state trial court held that the terms of the proposed constitutional amendment were consistent with the First Amendment and declined to remove the question from the ballot. The plaintiffs appealed, but the Court of Appeals affirmed.

South Dakota

Initiated Measure 22 (IM-22) proposes to overhaul South Dakota's campaign finance laws. First, the measure proposes to impose limits for the first time on PAC contributions to candidates, making these limits equal to those imposed on individual contributors. The measure also proposes to decrease the limits on contributions from individuals to candidates for lieutenant governor and attorney general to $2,000 per calendar year, and to candidates for other state offices (except governor) to $1,000 per calendar year (the limit is currently $4,000 per calendar year for all statewide candidates). The measure also calls for a decrease in contribution limits for state legislative and county office candidates to $750 per calendar year (currently $1,000). Additionally, the measure would decrease the limit on contributions to PACs from $10,000 to $2,000 per calendar year and the limit on contributions to political parties from $10,000 to $5,000 per calendar year.

IM-22 also proposes more substantial disclosure requirements on individuals and organizations financing certain communications within 60 days of a South Dakota election. As an initial matter, the definition of "independent expenditure" under the measure is much broader than the commonly understood term and is more akin to an "electioneering communication." The definition covers any communication that refers to a clearly identified candidate and that targets the candidate's relevant electorate within 60 days of an election. An organization that spends $100 on such advertisements must include a disclaimer and list the organization's top five contributors over the previous 12 months. The sponsor must also file a report within 48 hours, itemizing contributors until the full amount of the independent expenditure is accounted for and indicating whether the expenditure is for or against a particular candidate, ballot measure, or political party.

The measure proposes to make a host of other changes to South Dakota campaign finance law, including new disclaimer requirements and a "Democracy Credit Program," whereby residents receive two $50 vouchers from the government to contribute to candidates of their choice.

Washington State

Initiative 1464 (I-1464) proposes several major changes to Washington State campaign finance law. Of significance are new restrictions on campaign contributions from government contractors and lobbyists and the expansion of expenditures that are considered coordinated with a candidate. The initiative also proposes a comprehensive public financing program.

If the initiative were to pass, Washington would join the growing number of states that have pay-to-play laws. This pay-to-play law would apply to a contract or contracts worth at least $100,000. It would limit contributions from contractors, prospective contractors, entities owned by the contractor or in which the contractor has a controlling interest, and persons owning or having a controlling interest in the contractor (if the contractor is an entity). The law would also cover officers and directors and immediate family members of the contractor. Any person covered by the law would not be permitted to contribute

continued on page 9

State Lobbying Update: New York Extends Amnesty Deadline; California Updates Definition of 'Lobbyist'

By Caleb P. Burns and Karen E. Trainer

In June, the New York Joint Commission on Public Ethics (JCOPE) voted to extend an amnesty program for lobbyists and lobbyist employers who failed to submit required filings. JCOPE was originally scheduled to accept applications for the amnesty program through June 30, but extended the deadline through September 30.

Under the amnesty program, lobbyists or clients who meet certain conditions may apply for amnesty from fines and penalties for failing to submit required filings due on or after December 10, 2006. Among other things, those participating in the amnesty program must agree to submit overdue registrations and reports for lobbying activity from January 1, 2013 forward, pay filing fees, and participate in training.

In July, California's Fair Political Practices Commission (FPPC) voted to amend its definition of a lobbyist to address activities by outside lobbyists who engage in direct lobbying, but do not register. California requires outside lobbyists to register when an individual receives in excess of $2,000 in a month for "direct communication" with the intent to influence government action.

Under the revised regulation, if the FPPC determines that an outside lobbyist receives in excess of $2,000 in a month for services that include, among other things, direct communication with the intent to influence government action, the FPPC will presume that lobbyist registration is required. The lobbyist can provide evidence, such as testimony, bills, and receipts, to establish whether or not the $2,000 threshold has been met specifically for "direct communication" to influence government action and, therefore, whether registration is actually required. ■

Caleb P. Burns
202.719.7451
cburns@wileyrein.com

Karen E. Trainer
202.719.4078
ktrainer@wileyrein.com

FEC Adopts Interim Procedure for Potentially False or Fictitious Filings

By Karen E. Trainer

In August, the Federal Election Commission (FEC) announced an interim procedure for filings containing potentially false or fictitious information. The procedure was announced as a result of numerous filings in the 2015–2016 election cycle that appear to be false, such as Statements of Candidacy filed in the names of celebrities or fictitious characters.

Under the procedure, the FEC will send letters in response to apparently false or fictitious filings. Among other things, each letter will direct the filer to confirm or withdraw the filing and note the penalties for filing false statements with the government. The FEC intends to adopt a permanent procedure as part of its 2017–2018 report review policy.

The interim procedure underscores the importance of ensuring that all filings submitted to the FEC or any other government agency are complete and accurate. ■

For more information, please contact:

Karen E. Trainer
202.719.4078
ktrainer@wileyrein.com

Challenging the Constitutionality of Alabama's Lobbyist Training Requirement

By Carol A. Laham and Louisa Brooks

A Washington, DC-based lawyer and her nonprofit employer have filed a federal lawsuit to enjoin an Alabama law that requires her to attend an in-person lobbyist training in Alabama as a condition of communicating with Alabama lawmakers about state legislation.

Maggie Ellinger-Locke is a legislative counsel at the Marijuana Policy Project (MPP), a 501(c)(4) nonprofit corporation based in Washington, DC. As part of her work at MPP, Ellinger-Locke monitors state legislative developments on the regulation of marijuana and contacts elected state officials to discuss proposed or pending legislation. One of the states she monitors is Alabama, where the state legislature in recent years has enacted several measures related to marijuana regulation.

As alleged in her complaint, Ellinger-Locke wanted to discuss this legislation with Alabama state officials, but a regulatory hurdle stood in her way: If she contacted Alabama officials to discuss the legislation, she would be required to register as a state lobbyist and then, within 90 days, travel 800 miles from her home in Arlington, VA, to Montgomery, AL, to attend a one-hour lobbyist training. Alabama is one of several "zero threshold" states for lobbying activity—meaning the state has no "de minimis" exception for a person who makes only minimal communications with officials. An individual who is compensated to make even a single lobbying communication in Alabama triggers registration and reporting obligations, as well as the in-person training requirement.

Making the burden of attending lobbyist training even more onerous, Alabama only offers training sessions four times per year. At this time, there is only one remaining training session scheduled for 2016, to be held on September 28.

Considering the significant travel expenses and cost of time associated with attending the mandatory training, Ellinger-Locke and MPP decided it was cost prohibitive for her to communicate with the Alabama officials. Their subsequent lawsuit asserts that Alabama's requirements have chilled Ellinger-Locke's speech in violation of her First Amendment rights and infringed on her right to petition the government. The suit was filed August 31 in the Middle District of Alabama, and our team will be monitoring its progress.

While many states require ethics training for lobbyists, nearly all offer an online option for completing the training. California remains the other significant holdout from an online option, requiring lobbyists to attend an in-person ethics course in Sacramento, CA, within 12 months of first registering as a lobbyist. Our team regularly counsels clients on compliance with state lobbying laws and can offer guidance as you navigate activity in the states. ■

For more information, please contact:

Carol A. Laham
202.719.7301
claham@wileyrein.com

Louisa Brooks
202.719.4187
lbrooks@wileyrein.com

Updates to Massachusetts Campaign Finance Law

By Andrew G. Woodson and Louisa Brooks

The Massachusetts legislature recently enacted several significant changes to the Commonwealth's campaign finance law. Effective immediately,

- State House and Senate candidates who run in both a special election and a regular general election during the same year now have separate, $1,000 contribution limits for each of those elections. Previously, the contribution limit was $1,000 total per calendar year;
- Billboards and direct mail advertisements are added to the types of independent expenditures and electioneering communications that must list the top five contributors to the committees or organizations that paid for the communications. Previously, only paid TV, Internet, and print advertisements were subject to this requirement;
- Local party committees must disclose on their campaign finance reports the name, address, elective office held (if any), and office sought by each candidate for whom the committee made an expenditure; and
- For expenditures made to support or oppose a candidate, state party committees and PACs must identify the candidate on the memo line of their check.

Please contact us if you have questions about how these new provisions may affect your activity in Massachusetts. ■

For more information, please contact:

Andrew G. Woodson
202.719.4638
awoodson@wileyrein.com

Louisa Brooks
202.719.4187
lbrooks@wileyrein.com

continued from page 3

In several recent campaign finance rulings, the Supreme Court has held that campaign finance laws may not be used to "level the playing field." Rather, it is the law itself that must be level and treat different persons and entities equally. For example:

- Candidates may not benefit from increased limits on the contributions they may accept if their opponents self-fund their campaigns (*Davis v. FEC*, 2008);
- A public funding scheme may not award state funds for candidates based on the amounts spent by their opponents and independent groups (*Arizona Free Enterprise Club v. Bennett*, 2011);
- Aggregate limits may not be imposed on top of base contribution limits to restrict how much individuals may give to all candidates, PACs, and party committees (*McCutcheon v. FEC*, 2014).

The Kentucky decision requiring unions and LLCs to be subject to the same contribution prohibition as corporations is consistent with this jurisprudence, which traces back to the beginnings of modern campaign finance law in the Supreme Court's 1976 *Buckley v. Valeo* decision. What is slightly unusual about the Kentucky decision is that this doctrine is typically used to remove legal burdens, rather than to impose additional legal burdens, as was done to unions and LLCs in this case.

The Big Picture

Slightly less than half of the states prohibit corporations from using their general treasury funds to make political contributions to candidates for state office, and only a handful of states purport to prohibit corporate contributions while permitting union contributions, as was the case in Kentucky. While the federal district court ruling in Kentucky is not binding on those other states where corporations and unions are treated differently, the outcome of this case may encourage similar litigation in those states and may serve as persuasive authority for ending such disparate treatment. As in Kentucky, however, it is unlikely that bans on corporate contributions in those states will be invalidated altogether.

Several other states with prohibitions against corporate contributions also purport to prohibit corporations from using their general treasury funds and resources to support their PACs' administrative costs. The Kentucky ruling also calls into question the constitutionality of those states' restrictions on corporate support for their PACs. In yet another permutation, at least one state permits corporate contributions, but treats corporations' administrative support for their PACs as contributions, subject to dollar amount limitations. ■

For more information, please contact:

Jan Witold Baran
202.719.7330
jbaran@wileyrein.com

Eric Wang
202.719.4185
ewang@wileyrein.com

continued from page 4

more than $100 to a candidate for an office with a decision-making role with respect to the contractor's contracts.

The initiative also proposes a $100 limit on contributions from lobbyists to candidates for an office having decision-making authority over matters about which the person had lobbied in the previous four years. The initiative purports to extend the restriction to similar affiliated entities and persons as in the pay-to-play law.

I-1464, in an effort to curb independent expenditures, significantly expands the universe of communications that are considered coordinated with a candidate. The initiative provides that "[a]n expenditure in support of a candidate or opposing a candidate's opponent … is presumed to be made in coordination with that candidate or the candidate's agent … and is thus presumed to be a contribution" under a number of specific circumstances. For example, the presumption of coordination applies when, within two years prior to the expenditure being made and within the same election cycle:

- The candidate or agent, and the person making the expenditure, attended a meeting at which campaign-related strategy or planning related to the candidate's election was discussed;
- The candidate or agent, and the person making the expenditure, shared office space; or
- The candidate or agent, and the person making the expenditure, had the same agent or coordinated with the same person for non-ministerial campaign-related purposes.

The presumption would also apply when the candidate or agent contributed to a political committee making the expenditure; solicited contributions to the political committee making the expenditure; or solicited contributions at an event hosted or organized by the political committee making the expenditure.

The presumption of coordination is a rebuttable one. Once the basis for the presumption has been established by a preponderance of the evidence, the burden of proof shifts to the alleged violator to disprove the presumed coordination. ■

For more information, please contact:

Carol A. Laham
202.719.7301
claham@wileyrein.com

Stephen J. Kenny
202.719.7532
skenny@wileyrein.com

continued from page 2

For their part, the FEC's three Republicans put forward a plan to set up a "safe harbor" certification program for corporations contributing to super PACs and other entities that can lawfully accept corporate funds under state/local law. Such entities could satisfy their obligation to investigate whether a suspect contribution was made from foreign national funds by requesting an authorized representative of the corporation certify that:

- The contributing corporation is organized under or created by the laws of the U.S. or of any State or other place subject to the jurisdiction of the U.S. and has its principal place of business within the U.S.;
- No foreign nationals directed, dictated, controlled, or directly or directly participated in the decision-making process of the corporation with regard to the making of the corporation's contribution or donation; and
- The corporation used only its net earnings generated from U.S. operations to make the contribution or donation.

This proposal failed on a 3-3 vote as well, with the FEC Democrats claiming that the proposal did not go far enough. Commissioner Weintraub indicated, however, that she may revisit this issue in the coming months as part of an effort to move forward with a narrower, consensus-driven proposal to address foreign money in U.S. elections. ■

For more information, please contact:

Andrew G. Woodson
202.719.4638
awoodson@wileyrein.com

SPEECHES/UPCOMING EVENTS

Corporate Lobbying, Gift and Campaign Finance Compliance
Caleb P. Burns, Speaker
George Washington University Graduate School of Political Management
September 28, 2016 | Washington, DC

Managing Complex Campaign Law Activities
Caleb P. Burns, Speaker
National Institute for Lobbying and Ethics
October 28, 2016 | Washington, DC

2016 NABPAC Biennial Post Election Conference
Jan Witold Baran, Speaker
November 16-18, 2016 | Palm Beach, FL

2016 NABPAC Biennial Post Election Conference
Caleb P. Burns, Speaker
November 16-18, 2016 | Palm Beach, FL

Shining a Light on Money & Influence: The Power of Data Visualization
D. Mark Renaud, Panelist
38th Annual Council on Governmental Ethics Laws (COGEL) Conference
December 12, 2016 | New Orleans, LA

Election Law Professionals

Jan Witold Baran	202.719.7330	jbaran@wileyrein.com
Michael E. Toner	202.719.7545	mtoner@wileyrein.com
Carol A. Laham	202.719.7301	claham@wileyrein.com
Thomas W. Kirby	202.719.7062	tkirby@wileyrein.com
D. Mark Renaud	202.719.7405	mrenaud@wileyrein.com
Caleb P. Burns	202.719.7451	cburns@wileyrein.com
Andrew G. Woodson	202.719.4683	awoodson@wileyrein.com
Robert D. Benton	202.719.7142	rbenton@wileyrein.com
Claire J. Evans	202.719.7022	cevans@wileyrein.com
Robert L. Walker	202.719.7585	rlwalker@wileyrein.com
Ralph J. Caccia	202.719.7242	rcaccia@wileyrein.com
Roderick L. Thomas	202.719.7035	rthomas@wileyrein.com
Bruce L. McDonald	202.719.7014	bmcdonald@wileyrein.com
Jason P. Cronic	202.719.7175	jcronic@wileyrein.com
Thomas W. Antonucci	202.719.7558	tantonucci@wileyrein.com
Daniel B. Pickard	202.719.7285	dpickard@wileyrein.com
Eric Wang	202.719.4185	ewang@wileyrein.com
Stephen J. Kenny	202.719.7532	skenny@wileyrein.com
Louisa Brooks*	202.719.4187	lbrooks@wileyrein.com
Karen E. Trainer, Senior Reporting Specialist	202.719.4078	ktrainer@wileyrein.com

*Not admitted to the DC bar. Supervised by the principals of the firm.

To update your contact information or to cancel your subscription to this newsletter, visit: www.wileyrein.com/newsroom-signup.html