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ELECTION LAW *NEWS*

Developments in All Aspects of Political Law | May 2018

Court of Appeals Affirms Conviction for False FEC Report

By Lee E. Goodman

On May 11, the U.S. Court of Appeals for the Eighth Circuit affirmed the conviction of three Ron Paul campaign officials for causing the campaign to file a false expenditure report with the Federal Election Commission (FEC). The Paul campaign paid $73,000 to Iowa State Senator Kent Sorenson for performing various services. Sorenson posed for photographs with supporters, made television appearances, sent emails supporting Ron Paul, and recorded a mass phone call on behalf of the campaign. He also traveled to South Carolina and appeared at rallies in support of Paul and met with state legislators encouraging them to endorse Paul. Sorenson also endorsed Ron Paul for President.

Due to political sensitivities, namely that payment for an endorsement would appear unseemly, the campaign chose to pay Sorenson through a video production vendor, as a sub-contractor, and reported the purpose of the payment as "audio/visual services." The campaign officials argued that this description was technically accurate because Sorenson

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FEC Comment Deadline Ending Soon: *Last Chance to Make Your Voice Heard on New Internet Disclaimer Rules*

By Jan Witold Baran and Andrew G. Woodson

As detailed in our March 15 client alert, the Federal Election Commission (FEC) is currently conducting a formal rulemaking on the disclaimer requirements applicable to many audio, video, graphic, and text-based political advertisements disseminated through the Internet, cell phones, and other digital devices. This proceeding is the first Internet-focused rulemaking at the FEC in over a decade and will impact Internet advertising for candidates, political committees, interest groups, advertising vendors, and all digital advertising platforms.

Notably, the rulemaking offers two alternative approaches to complying with the disclaimer requirements. At its most recent meeting, commissioners

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GAO Releases 2017 Audit of Lobbying Reports: *Get Your Organization Ready for the 2018 Audit*

By Carol A. Laham and Andrew G. Woodson

Earlier this spring, the U.S. Government Accountability Office (GAO) released its 2017 audit on lobbyist compliance with the Lobbying and Disclosure Act of 1995, as amended (LDA). As part of its review, the GAO examined over 250 reports from corporations, trade associations, and lobbying firms. While the audit found greater compliance in some areas and some continued challenges in others, it is nevertheless important for all lobbyists and their clients to review their lobbying practices early in 2018 to ensure continued compliance.

In addition to imposing new substantive requirements, the Honest Leadership and Open Government Act of 2007 requires the GAO to perform an annual audit of lobbyist compliance with the LDA. As in past years, the GAO looked at a random sample of publicly available lobbying reports – 98 quarterly LD-2 lobbying reports and 160 LD-203 contribution reports – to make some general conclusions about lobbying trends.

One positive development noted in the audit was that, while there is no specific statutory requirement to do so, 99% of all lobbyists were able – consistent with guidance issued by the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives – to provide documentation for their reported income and expenses. (This was a "statistically significant increase" over 2016's 83% figure.) The audit also noted that 93% of lobbyists filed their year-end LD-203 reports, as required, which was a figure generally consistent with the 2016 audit.

Some potential challenges, however, involved lobbyists' reporting of previously-held positions in the Executive or Legislative branches. The audit found that approximately 15% of all LD-2 reports may have failed to completely disclose relevant positions (including things like paid congressional internships). The audit also showed that, of the 3,433 new lobbying registrations between July 1, 2016, and June 30, 2017, only 2,995 of them (or 87.2%) had corresponding LD-2 reports filed during the same quarter as the registration.

The report also discussed the involvement of the U.S. Attorney's Office in Washington, DC, which currently has a number of personnel assigned to review lobbyist filings on both a full- and part-time basis, in helping enforce the lobbying laws. According to the audit, there are four open matters involving chronic offenders that are in the enforcement phase, which could lead to a settlement or some form of civil action.

Wiley Rein has extensive experience advising clients on the LDA and how to structure corporate and associational programs to ensure that the relevant data is captured and reported. Please let us know if we can assist your organization in reviewing its LDA compliance activities before the 2018 audit gets going in earnest. ■

For more information, please contact:

Carol A. Laham
202.719.7301
claham@wileyrein.com

Andrew G. Woodson
202.719.4638
awoodson@wileyrein.com

Federal Contribution Compliance Tips for the 2018 Primary Season

By Michael E. Toner and Brandis L. Zehr

1. Check the Federal Election Commission's (FEC) primary election chart before contributing to federal candidates.

Individual donors and federal political action committees (PACs) contributing to federal candidates during the primary season should keep in mind how the timing of primary elections might affect their contribution limits. Because an undesignated contribution to a federal candidate automatically counts toward the donor's contribution limit for the federal candidate's next election, a contribution made during the primary season could count toward either the primary or general election depending on whether the contribution is made before or after the federal candidate's primary. Undesignated contributions to a federal candidate made through the date of the candidate's primary automatically count toward the primary; undesignated contributions to a federal candidate made after the candidate's primary through the date of the general election automatically count toward the general election. In addition, if the federal candidate's primary has already occurred, a donor cannot make any monetary or in-kind contributions for the federal candidate's primary with one exception: If the federal candidate's campaign has outstanding debt from the primary, donors can make monetary contributions for the primary to help retire debt but must specifically designate their contributions for primary debt retirement. Donors who plan to "max out" to a federal candidate for both the primary and general elections, but have not yet made any contributions to the candidate, should ensure they make their primary contributions before the candidate's primary. A list of the 2018 primary election dates is available on the FEC's website **here**.

2. If your federal PAC is a quarterly filer, you might need to file pre-primary reports.

A federal PAC that opts to file quarterly reports with the FEC must file a pre-primary report if the PAC makes a contribution or independent expenditure in connection with a primary election during the pre-primary reporting period for that state. The pre-primary reporting period begins after the close of books for the PAC's most recently filed report and ends on the 20th day before the primary election; pre-primary reports are due 12 days before the primary election. In addition, pre-convention and pre-primary runoff reports may be required in some states. Given that state primary elections occur throughout the spring, summer, and early fall of 2018, it is possible that quarterly PAC filers may need to file more than one pre-primary report. To minimize or avoid triggering pre-primary reports, a federal PAC should review the FEC's pre-primary reporting chart and plan to make contributions to federal candidates outside of the applicable pre-primary reporting periods. Alternatively, a federal PAC could avoid triggering pre-primary reports by changing its filing frequency from quarterly to monthly in election years. (Monthly filers are not required to file pre-primary reports.) However, a federal PAC is permitted to change its filing frequency only once per calendar year. The 2018 pre-primary reporting periods and filing deadlines are available on the FEC's website **here**.

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New Campaign Finance Reform and Disclosure Measures Enacted In Multiple States

By D. Mark Renaud and Kenneth Daines

March and April were significant months for new campaign finance contribution and reporting measures that were passed in various states throughout the country this year, including specifically the states of Washington, New York, Utah, and Arizona. These recent developments are summarized respectively by state below.

Washington

Together with a number of other campaign-related laws, on March 19, 2018, Washington Governor Jay Inslee signed into law the Disclose Act, which has the stated purpose of increasing transparency in Washington elections. This donor disclosure law provides that a nonprofit group contributing at least $25,000 to election campaigns must publicly report: 1) its largest donors; 2) candidates or ballot measures the organization supports or opposes; and 3) identifying information about the organization's officers. These organizations are now also required to register with the state of Washington's Public Disclosure Commission, effective January 1, 2019. These measures are purportedly designed to bring about a more informed electorate.

New York

On April 18, 2018, New York Governor Andrew Cuomo signed the Democracy Protection Act into law, creating new disclosure requirements for social media political advertisements, as well as new restrictions on foreign entities' election activities. Specifically, the law requires any buyer of election ads on Facebook, Twitter, or other social media platforms to identify who paid for them, similar to purchasers of TV and radio ads. These individuals and entities will also now be required to register with the New York State Board of Elections as an independent expenditure committee. The Board in turn must preserve the online advertising content and information for a period of five years.

According to a press release from Governor Cuomo, the law was passed to protect the integrity of both state and national elections from foreign interference. Governor Cuomo stated: "We have a crisis in our election system. We now know that our election system was influenced and tampered with by foreign entities. And it's not partisan rhetoric, it's not a science fiction novel. We know it. Russia was involved. Special prosecutor Mueller indicted 13 Russians." Accordingly, the law also prevents foreign entities from purchasing political advertisements or from forming independent expenditure committees. These measures are part of a larger package of changes (like banning outside income for legislators) that Governor Cuomo has repeatedly proposed but which have not passed due to resistance from Republicans who control the majority in the state Senate. Of these proposals, only the social media ads requirements and foreign entity restrictions successfully passed.

Utah

On March 16, 2018, Utah Governor Gary Herbert signed House Bill 320 (Campaign Finance Modifications), which expanded the existing prohibition on campaign contributions to legislators while the Legislature is in session to the lieutenant governor, attorney general, state auditor, or the state treasurer. This prohibition applies to any person,

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New Campaign Finance Reform and Disclosure Measures Enacted In Multiple States *continued from page 4*

includes contracts, promises, or agreements to make a campaign contribution. The new law also prohibits these contributions to the personal campaign committee of any of the above covered individuals, or to a PAC controlled by those individuals. These prohibitions became effective immediately following Governor Herbert's signature.

Arizona

On April 5, 2018, Arizona Governor Doug Ducey signed a new campaign finance law that blocks local so-called "dark money disclosure" ordinances from requiring nonprofit groups contributing to local elections to register as PACs and report their donors.

According to the Arizona Capitol Times, Governor Ducey explained that while he believes in election transparency, this newly passed law reflects his view that people should be able to contribute anonymously to campaigns: "I think people have a First Amendment right as well to participate and not be bullied," he said. Advocates of this law have cited U.S. Supreme Court precedent, including its 1958 ruling in *NAACP v. Alabama*, which affirmed individuals' constitutional rights of anonymous speech and association.

The new law raises an important question likely to play out in the coming months: how will this legislation be applied to Arizona's "charter cities," which retain authority under the state constitution over matters of strictly local concern? Earlier this year, for example, residents of the charter city Tempe, Arizona, voted to enact a "dark money" disclosure law that requires reporting of campaign donors who spend more than $1,000 on a local election. And twice in the past decade, the Arizona Supreme Court has affirmed the rights of charter cities to regulate their local elections without state oversight. So there remains the potential for future litigation as Arizona implements the new law. ■

For more information, please contact:

D. Mark Renaud
202.719.7405
mrenaud@wileyrein.com

Kenneth Daines*
202.719.7292
kdaines@wileyrein.com

FEC Comment Deadline Ending Soon: Last Chance to Make Your Voice Heard on New Internet Disclaimer Rules *continued from page 1*

supplemented the original rulemaking with a series of examples detailing how the two proposals would apply to actual ads on Facebook, Instagram, etc. As these examples illustrate, some online ads that would be permissible under one approach would be effectively banned under the second approach because they do not comply with the latter's interpretation of the disclaimer requirements.

Comments are due on May 25, with a public hearing scheduled for June 27. Wiley Rein is available to work with interested parties to submit comments. ■

For more information, please contact:

Jan Witold Baran
202.719.7330
jbaran@wileyrein.com

Andrew G. Woodson
202.719.4638
awoodson@wileyrein.com

performed services that encompassed "audio" and media-related services. The U.S. Department of Justice (DOJ), however, argued that the actual purpose of the payment to Sorenson was for his endorsement and this purpose was falsified – and concealed – through the combination of the sub-contractor arrangement and the incorrect purpose of "audio/visual services."

The first trial in an Iowa federal court ended in a mistrial. The DOJ re-prosecuted a second time, with a jury convicting the campaign chairman, campaign manager, and deputy campaign manager on several counts, all related to the report of an expenditure to a video production company for the stated purpose "audio/visual services." The campaign officials were convicted of:

- causing false records, in violation of 18 U.S.C. §§ 2 and 1519 (under the Sarbanes-Oxley Act of 2002);
- causing false campaign expenditure reports, in violation of the Federal Election Campaign Act (FECA), 52 U.S.C. §§ 30104(a)(1), (b)(5)(A), and 30109(d)(1)(A)(i) and 18 U.S.C. § 2;
- engaging in a false statements scheme, in violation of 18 U.S.C. §§ 2 and 1001(a)(1); and
- conspiring to commit the offenses listed above, in violation of 18 U.S.C. § 371.

The application of Sec. 1519 of the Sarbanes-Oxley Act to a FEC reporting violation marks the second time in the past year that federal appeals courts have opened this new legal risk for political committees and treasurers. The application of Sec. 1519 to FEC reporting is particularly significant because a violation carries more severe punishment than Congress prescribed for FEC reporting in the FECA. Moreover, the Sarbanes-Oxley Act was "designed to protect investors and restore trust in financial markets following the collapse of Enron Corporation." *Yates v. United States*, 135 S. Ct. 1074, 1079 (2015). The Supreme Court of the United States has cautioned against "cut[ting] § 1519 loose from its financial-fraud mooring to hold that it encompasses any and all objects, whatever their size or significance, destroyed with obstructive intent." *Id.* Nevertheless, the Eighth Circuit found that the Sarbanes-Oxley Act applies to FEC reporting, and the violation is in addition to a violation of the FECA. In so holding, the Eighth Circuit joined the U.S. Court of Appeals for the Second Circuit in holding that a defendant may properly be convicted for violations of the FECA and of Sec. 1519 for a single reporting violation. See *United States v. Rowland*, 826 F.3d 100 (2d Cir. 2016) (affirming convictions for violations of the FECA and 18 U.S.C. §§ 371, 1001, and 1519), cert. denied, 137 S. Ct. 1330 (2017). Thus, one false report can violate three laws: the FECA, the Sarbanes-Oxley Act, and the prohibition against false statements in Sec. 1001 of the federal criminal code.

The Eighth Circuit also was unimpressed by the vagaries of FEC expenditure reporting rules and approved descriptions. In the past, many have considered the approved purpose statements to be highly subjective and imprecise, especially in the case of multi-purpose vendors performing several services, but political committees have done the best they can to match expenditures with the FEC's approved list of purposes. The Eighth Circuit's decision reinforces the importance of consultation with FEC analysts when there are questions about appropriate purpose descriptions.

Although the Eighth Circuit did not per se rule out sub-contracting as a legitimate

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business arrangement for committees and vendors, the case does caution that sub-contracting, combined with the purposes reported, should not be used to disguise or conceal financial arrangements through non-bona fide sub-contracting arrangements. Although, expenditure purpose reporting has been deemed less consequential, practically and constitutionally, the 8th Circuit decisionunderscores the importance of accurate reporting of not only contributions but expenditures, including accurate purposes of all expenditures. ■

For more information, please contact:

Lee E. Goodman
202.719.7378
lgoodman@wileyrein.com

Federal Contribution Compliance Tips for the 2018 Primary Season *continued from page 3*

3. Hosting a federal candidate fundraiser in your home? Your $1,000 in-home event exemption resets after the primary.

Under the in-home event exemption, an individual may spend up to $1,000 per candidate, per election on food, beverages, and invitations in connection with a federal candidate campaign event held in the individual's home. Each individual residing in the home has a separate $1,000 exemption; spouses have a combined in-home event exemption of $2,000 per candidate, per election. Although the money spent under this exemption is not considered to be an in-kind contribution to the federal candidate's campaign (and does not count against the individual's contribution limit for the federal candidate), any money spent in excess of the $1,000 exemption or for expenses other than food, beverages, and invitations is considered to be an in-kind contribution and counts against the individual's contribution limit for the federal candidate. Because the $1,000 in-home event exemption applies per candidate, per election, individuals have a separate $1,000 exemption for the primary and general elections. In-home event expenses paid for through the date of the primary election count toward the $1,000 exemption for the primary; in-home event expenses paid for after the primary election through the date of the general election count toward the $1,000 exemption for the general election. ■

For more information, please contact:

Michael E. Toner
202.719.7545
mtoner@wileyrein.com

Brandis L. Zehr
202.719.7210
bzehr@wileyrein.com

Please note that Maryland's semiannual pay-to-play report is due on May 31 from certain state and local government contractors, even if no reportable contributions have been made. For more information, please contact:

Mark Renaud at 202.719.7405 or mrenaud@wileyrein.com.

New Study Ranks States' Campaign Contribution Laws

By Caleb P. Burns and Eric Wang

Based on how campaign finance laws are often portrayed in the news media, the conventional wisdom holds that the campaign finance system is in need of perpetual "reform." Such reforms typically entail a one-way ratchet in favor of more restrictions on campaign contributions and speech. However, a new study by the Institute for Free Speech (IFS), ranking the 50 states' campaign contribution laws, challenges that conventional wisdom. In addition to underscoring the challenges that our clients often face when making contributions in connection with state elections, the IFS study suggests that, to the extent "reform" is needed at the state level, it should be in the direction of liberalization.

As the IFS "Free Speech Index" highlights, the United States' system of federalism is both a boon to policy innovation and a compliance headache for clients that conduct activities in a multitude of states. As IFS notes, its study "challenge[s] the assumption that campaign contributions are regulated in a similar manner by all states. Quite the contrary." Overall, the study notes that campaign contributions are "more highly regulated than at any time prior to the 1970s, and in some important ways more highly regulated than ever."

Thus, prior to making contributions to state candidates, state political parties, and state PACs in any given state, an individual, corporation, or PAC must consult the applicable state laws to determine what contribution limits, registration and reporting requirements, and blackout periods apply. Clients who are lobbyists or government contractors, or who are related to lobbyists or government contractors, often are subject to enhanced regulation under states' laws.

At the same time, the IFS study reveals the extent to which many states' campaign contribution laws are far more liberal than others', and also more liberal than the federal laws. For example, the IFS study highlights that 28 states allow unlimited contributions from individuals to political parties, and 22 states allow political parties to provide unlimited support to their candidates.

At the federal level, contributions to the national political party committees have been regulated for more than 40 years, and have become even more so since the enactment of the "Bipartisan Campaign Reform Act" of 2002. That 2002 federal law even regulated state party committees' "federal election activities." **As *Election Law News* has explained**, this has led to various efforts in recent years to undo some of those federal restrictions, whether through litigation, rulemakings at the Federal Election Commission, or riders in omnibus budget bills.

The IFS study also notes that 32 states allow unions, corporations, or both to make contributions directly to candidates, and 11 states have no limits on how much individuals may contribute to candidates, PACs, or parties. Again, this is in contrast to the federal laws, which prohibit corporations and unions from making direct political contributions to candidates, party committees, and conventional PACs, and also limit individual contributions.

The policy implications of the IFS study are significant. As IFS explains, "[t]he right to contribute to candidates, parties, and political groups allows citizens to simply and effectively join with others to amplify their voices and advocate for change. The right to speak out about politics is a core First

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Amendment right, and limits on one's political donations infringe on that right." Accordingly, the IFS study awards top scores to states with the least restrictive campaign contribution laws and ranks states with the most restrictive laws last. The five states that tied for the top score of "A+" in the IFS study were Alabama, Nebraska, Oregon, Utah, and Virginia. Six other states earned "A" grades. Eleven states received "F" grades: Alaska, Colorado, Connecticut, Hawaii, Kentucky, Maryland, Massachusetts, Missouri, Oklahoma, Rhode Island, and West Virginia.

What is striking about these results is the diversity among the top-scoring and the bottom-scoring cohorts. Put another way, there is no correlation between how restrictive states' campaign contribution laws are and good governance. Citing other original research by the organization, the IFS study notes:

- "[F]our of the ten least corrupt states [Iowa, Nebraska, Oregon, and Utah] place no limit on the amount individuals may contribute to state legislative candidates";
- "[T]wo of the top three best-governed states [Utah and Virginia] have no limits at all on how much may be given to candidates from any source"; and
- There is "no relationship between the presence of limits on corporate and union contributions to state legislative candidates and a state's corruption rate or quality of government as determined by the Pew Center on the States."

The IFS study on states' campaign contribution laws is the first part of the organization's "Free Speech Index." Wiley Rein's Election Law practice group has assisted IFS with compiling the second part of the organization's index, which is under development and will focus on state laws regulating speech by independent groups. ■

For more information, please contact:

Caleb P. Burns
202.719.7451
cburns@wileyrein.com

Eric Wang
202.719.4185
ewang@wileyrein.com

Disclosure: Eric Wang is also a pro bono Senior Fellow with the Institute for Free Speech.

New York JCOPE Settles Lobbyist Investigations

By Carol A. Laham and Louisa Brooks

In early April, the New York Joint Commission on Public Ethics (JCOPE) settled two cases against state lobbyists who made payments to a 501(c)(4) entity at the behest of New York City Mayor Bill de Blasio. Nonprofit organization New Yorkers for Clean, Livable and Safe Streets (NYCLASS) agreed to pay JCOPE $10,000 for failing to register and report as a lobbyist, and well-known New York City lobbyist James Capalino agreed to pay $40,000 to settle the matter against him, although he did not admit to any violation of the lobbying law.

At issue in both matters were payments the lobbyists made to the Campaign for One New York (CONY), a 501(c)(4) entity organized by Mayor de Blasio's former campaign officials to educate the public and policymakers about legislative and public policy options. In effect, the purpose of the organization was

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to support the Mayor's legislative and policy agenda.

After de Blasio asked NYCLASS president Steven Nislick to donate to CONY in 2014, Nislick and NYCLASS board member Wendy Neu together made aggregate donations of $125,000 between 2014 and 2015. During this time period, NYCLASS was actively lobbying City officials, including the Mayor; from January to July 2014, it was doing so without being properly registered as a lobbyist.

Similarly, in 2015 Mayor de Blasio asked lobbyist Capalino to support efforts to advance the City's legislative and policy objectives. The Mayor put Capalino in touch with CONY's treasurer, who then asked Capalino to make a donation. Capalino donated $10,000 personally and obtained an additional $90,000 in donations from his lobbying clients. Shortly after these donations, Capalino coordinated with the CONY treasurer to set up a meeting between the Mayor and the lobbying clients who had made donations.

After learning of these payments, JCOPE opened investigations to determine whether NYCLASS or Capalino had violated New York's lobbying law. Under the New York State Lobbying Act and JCOPE regulations, any gift from any individual or entity who is required to be listed on a New York lobbyist or client registration to a public official is presumptively impermissible. JCOPE regulations further provide that a lobbyist or client may not offer or give a gift to "a third party, including a Charitable Organization ... at the designation or recommendation of a Public Official" when the lobbyist would be prohibited from providing the gift to the official directly. Importantly, a "Charitable Organization," as defined in the regulations, includes not only 501(c)(3) entities but also any entity registered with the New York Attorney General's Charities Bureau. Because CONY was registered as a charitable organization in New York, the lobbying law prohibited lobbyists and lobbyist clients from donating to CONY at the behest of a public official, such as Mayor de Blasio.

Notably, none of the respondents admitted to any violation of this gift-related provision of New York law. Nevertheless, it is clear that payments to nonprofit organizations, at the behest of a public official, present the possibility of investigation and potentially hefty civil penalties in New York state. We are aware of a number of other jurisdictions with similar restrictions or reporting requirements for "behested payments." As the penalties paid by NYCLASS and Capalino demonstrate, the best method for staying out of the headlines is to vet such donations first to ensure they comply with relevant laws. ■

For more information, please contact:

Carol A. Laham
202.719.7301
claham@wileyrein.com

Louisa Brooks
202.719.4187
lbrooks@wileyrein.com

2018 State Lobbying and Gift Law Guide

50 States Plus the District of Columbia

The State Lobbying and Gift Law Guide is a comprehensive guide to the lobbying laws and gift rules for all 50 states and the District of Columbia. The Guide is an essential tool for determining whether your organization's contemplated state-level activities are permissible and what registration and reporting requirements might apply, in addition to pertinent gift rules. Our guide is unique. It includes citations to relevant authority as well as analysis based on advisory opinions and relevant interpretations of law issued on a state-by-state basis. It allows you to make informed decisions about your activity.

Authored by Wiley Rein attorneys, the Guide has served as an important resource over the last decade for more than 300 U.S. and foreign corporations and trade associations, as well as individuals, and political organizations.

Among other information, each individual state Guide includes a discussion of the following:

- The definition(s) of legislative and executive branch lobbying and how the administrative agencies have interpreted the definition(s), including exemptions;
- The threshold for registration and reporting as a lobbyist and as a lobbyist employer as well as the details of the process;
- The lobbying laws covering government contracting and procurement;
- The registration, reporting, and disclaimer requirements applicable to grassroots lobbying;
- The general gift rules applicable to legislative and executive branch officials and employees; and
- Special gift and campaign finance rules applicable to lobbyists, lobbyist employers, and vendors (such as gift bans, contribution bans, and the like).

Who can benefit from the guide:

- Compliance Counsel
- Corporate Counsel's Office
- Employers of Lobbyists
- Government Contractors
- Government Affairs Personnel
- Lobbyists

For more information, please visit: wileyrein.com/practices-lobbying-and-gift-law-guide.html or contact Lynne Stabler at LStabler@wileyrein.com

Events & Speeches

Basics of the Federal Election Campaign Act

Jan Witold Baran, Speaker

Practising Law Institute

August 1, 2018 | Audio Briefing

Corporate Political Activities 2018: Complying with Campaign Finance, Lobbying and Ethics Laws

Jan Witold Baran, Co-Chair

Practising Law Institute

September 6-7, 2018 | Washington, DC
October 4-5, 2018 | San Francisco, CA

Election Law Professionals

Thomas W. Antonucci	202.719.7558	tantonucci@wileyrein.com
Jan Witold Baran Practice Co-Chair	202.719.7330	jbaran@wileyrein.com
Robert D. Benton	202.719.7142	rbenton@wileyrein.com
Louisa Brooks	202.719.4187	lbrooks@wileyrein.com
Caleb P. Burns	202.719.7451	cburns@wileyrein.com
Ralph J. Caccia	202.719.7242	rcaccia@wileyrein.com
Tessa Capeloto	202.719.7586	tcapeloto@wileyrein.com
Jason P. Cronic	202.719.7175	jcronic@wileyrein.com
Ken Daines*	202.719.7292	kdaines@wileyrein.com
Claire J. Evans	202.719.7022	cevans@wileyrein.com
Thomas W. Kirby	202.719.7062	tkirby@wileyrein.com
Sarah B. Hansen*	202.719.7294	shansen@wileyrein.com
Carol A. Laham	202.719.7301	claham@wileyrein.com
Bruce L. McDonald	202.719.7014	bmcdonald@wileyrein.com
Daniel B. Pickard	202.719.7285	dpickard@wileyrein.com
D. Mark Renaud	202.719.7405	mrenaud@wileyrein.com
Roderick L. Thomas	202.719.7035	rthomas@wileyrein.com
Michael E. Toner Practice Co-Chair	202.719.7545	mtoner@wileyrein.com
Karen E. Trainer, Senior Reporting Specialist	202.719.4078	ktrainer@wileyrein.com
Robert L. Walker	202.719.7585	rlwalker@wileyrein.com
Eric Wang	202.719.4185	ewang@wileyrein.com
Andrew G. Woodson	202.719.4683	awoodson@wileyrein.com
Brandis L. Zehr	202.719.7210	bzehr@wileyrein.com

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

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