

# Lobbying Disclosure Act: Updated Guidance and Upcoming Reporting Dates

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January 2012

Pursuant to its statutory authority to issue guidance on the Lobbying Disclosure Act (LDA), the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives issued revised LDA guidance on December 15, 2011. (This updated LDA Guidance is available [here](#).)

The revised LDA Guidance makes one substantive clarification for a situation where a company already has an existing external lobbyist who then brings on a second lobbyist to bolster the government affairs team. The second lobbyist might have expertise in a specific area or have close relationships with certain people. If this second lobbyist is a subcontractor to the first lobbyist, then the LDA Guidance calls for the second lobbyist, on its registration statement, to list the first lobbyist as its "client" and also note that it is working on behalf of the entity. (For example, Entity hires Lobbying Firm A, and Lobbying Firm A hires Lobbying Firm B to further Entity's objectives. In this situation, Lobbying Firm B should list "Lobbying Firm A on behalf of Entity" as the client on its registration statement.) Further, the company also should be listed as an affiliate on line 13 of Form LD-1.

As a reminder, two different LDA reports are due this month. First, the Fourth Quarter LD-2 Report is due on January 20, 2012, and covers the period October 1-December 31, 2011. Second, the Second Semiannual LD-203 Contribution Report is due on January 30, 2012, and covers the period July 1-December 31, 2011. Wiley Rein has extensive experience counseling clients on completing these reports and is available to answer any questions that your corporation or organization may have.

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