

Update on HLOGA: Frequently Asked Questions

The purpose of this Client Advisory is to provide a brief update on select current Honest Leadership and Open Government Act of 2007 (“HLOGA”) issues. For your reference, we’ve answered some of the most common “frequently asked questions” we have recently received in regards to HLOGA requirements.

1. When will the LD-203 Form be available?

It is our understanding that the LD-203 Form will not be available until the second half of June or early July.

2. Should I wait to obtain an individual lobbyist ID and password for the LD-203 reports?

Yes. If you request an ID now, you will receive an organizational ID instead of an individual ID. If you have mistakenly received an organizational ID, you should contact the Senate Office of Public Records immediately.

3. Is there any new congressional guidance on LD-203 reporting?

Yes. We understand that Congress is developing a web-based system for LD-203 reporting. Registrants should receive an email from Congress by mid-June that will enable each registrant to affirm its active in-house lobbyists. Those lobbyists will then be contacted directly via email by Congress to activate their own individual accounts with an individualized password. We understand that Congress will be issuing formal training materials and other guidance to Registrants in June for LD-203 reporting.

4. Has the Government Accountability Office (“GAO”) begun conducting “random audits”?

Yes. The GAO has sent out audit letters in May to a sampling of registrants regarding first quarter 2008 LD-2 reports. GAO auditors have requested to review internal records and other documentation from

registrants that were used to prepare a registrant’s LD-2 report. Additionally, the GAO is seeking information regarding internal HLOGA compliance programs. Lastly, the GAO is seeking information from registrants regarding their experience complying with the new lobbying disclosure law.

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FOR MORE INFORMATION

As new developments regarding HLOGA compliance continue to be announced, we will provide further updates. In the meantime, should you have any legal questions related to HLOGA compliance please contact:

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