

A GUIDE TO POLITICAL AND LOBBYING ACTIVITIES

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Public Policy and Law Guide

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This February 2019 edition of *A Guide to Political and Lobbying Activities* (the "Guide") includes updates to reflect an increased scrutiny of representation of foreign governments, corporations, and other entities in the United States and the possibility of additional legislative reforms in this area. It also includes analysis and guidance – limited as it may be due to a still unfolding case – regarding disclosure of certain politically-related contributions to 501(c)(4) tax-exempt entities and possibly other entities as a result of the *CREW v. FEC* case that was decided in September 2018.

The *Guide* continues to track changes brought about by the Office of Government Ethics' ("OGE") publication of revised gift rules applicable to executive branch employees that became effective in 2017, including changes to the widely attended gatherings exception and various new rules on gift and post-employment restrictions that apply to political appointees who are required to sign President Trump's ethics pledge.

Finally, we note that the Department of Justice ("DOJ") continues to demonstrate heightened attention to lobbying registration (beyond just registration on behalf of foreign entities) and campaign finance issues. Corporations, trade associations, and other tax-exempt organizations need to remain careful in their interactions with candidates, their campaigns, and elected officials, as the DOJ has previously handed down sizable fines to lobbying registrants for skirting registration requirements.

Click [here](#) to download the *Guide*.

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