

Partner, Washington, D.C.

Political Law Compliance and Investigations



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Education

J.D., Harvard Law School, 1992
(*cum laude*)

B.A., Cornell University, 1989
(*cum laude*)

Bar Admissions

District of Columbia
New York

Ki P. Hong is the head of Skadden's Political Law Compliance and Investigations Group. He advises major corporations on the unique political law issues they face when engaging in government affairs or government procurement activity. These include federal and state campaign finance, lobbying, gift, ethics and conflict-of-interest laws. Mr. Hong also advises clients on pay-to-play laws that impose special restrictions on the political activity of companies that have or seek government contracts, as well as their covered employees. He advises clients on establishing and maintaining comprehensive systems to ensure compliance with those laws. In addition, he represents clients at the enforcement stage.

Mr. Hong's clients include companies from a wide range of different industries. He represents three of the "Big Four" accounting firms and leaders in other industries, such as technology, energy, media, insurance and communications. He also represents nine of the top 10 U.S. banks and nearly all of Wall Street.

Mr. Hong is well-regarded for his experience with state and federal pay-to-play laws. Such laws include MSRB Rules G-37/G-38, including amendments to Rule G-37 that apply to municipal advisors. He also advises clients on implementing Dodd-Frank's definition and regulation of municipal advisors. He has extensive experience in SEC Rule 206(4)-5 for investment advisors and drafted model policies and procedures to address this Rule that have become the industry standard. Mr. Hong also advises clients on the pay-to-play provisions within CFTC Rule 23.451 covering swap dealers.

He also has extensive experience advising clients on election, lobbying and government ethics laws. Mr. Hong routinely represents clients before federal enforcement agencies such as the Federal Election Commission, and he works with the House and Senate Ethics Committees, the Office of Congressional Ethics and the Office of Government Ethics. He also works frequently with various state ethics commissions around the country. He advises clients on state laws that require government contractors and investment advisers to register as lobbyists.

Mr. Hong regularly counsels major corporations on inquiries and proxy proposals issued by shareholder groups regarding transparency in corporate political spending and lobbying activities.

Mr. Hong served on the steering committee of the Council on Government Ethics Laws (COGEL), an association of the federal and state government agencies that implement and enforce campaign finance and ethics laws throughout the United States and Canada. Mr. Hong is the first attorney in private practice to be elected to the steering committee in COGEL's history.

Mr. Hong co-authored the *Ethics Handbook for Entertaining and Lobbying Public Officials*, which was first published in 1994 and continues to be updated for subscribers. He co-authored several chapters of the Practising Law Institute's publication "Corporate Political Activities" for every edition of the publication since 1993. He also co-authors the Institute's "Corporate Political Activities Deskbook."

Ki P. Hong

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He is a regular speaker at conferences, such as those organized by the Practising Law Institute, the Investment Adviser Association and the Securities Industry and Financial Markets Association. He also is a main speaker at an all-day seminar that he organizes every year, having completed the 24th annual seminar with more than 220 attendees in May 2019. Mr. Hong is ranked in Band 1 for political law in *Chambers USA: America's Leading Lawyers for Business* and has been named in *The Best Lawyers in America*. *Washingtonian Magazine* also has repeatedly recognized him as a top lawyer in the field of ethics and election law, and in 2022 named him to its Top Lawyers Hall of Fame.

Selected Publications

“Corporate Political Activities: Complying with Campaign Finance, Lobbying & Ethics Laws” (select chapters), *Practising Law Institute*, Published yearly since 1992

“Tax Day Alert: Increased Interest on Deposits Will Cause More PACs To Owe Federal Income Tax,” *Skadden Publication*, April 11, 2024

“Stealthy Political Law Issues — Ignore at Your Own Peril,” *Reuters Legal News*, March 6, 2024

“Reminder: New Jersey Pay-to-Play Form BE Due April 1, 2024,” *Skadden Publication*, February 28, 2024

“Political Contribution Disclosure Rules in Illinois, Maryland, New Jersey, Pennsylvania, Philadelphia and Rhode Island,” *Skadden Publication*, February 1, 2024

“Legal Considerations When Supporting and Participating in National Party Conventions,” *Skadden Publication*, January 31, 2024

“For Financial Institutions: Reminder That Federal Political Activity Can Implicate Certain Pay-to-Play Rules,” *Skadden Publication*, January 17, 2024

“Lobbying Regulation: A Global Phenomenon,” *Reuters Legal News*, November 6, 2023

“Court Strikes Down Authority of New York Commission on Ethics and Lobbying To Enforce the Law,” *Skadden Publication*, September 11, 2023

“Reminder: Illinois Pay-to-Play Registration Updates Due Quarterly,” *Skadden Publication*, August 1, 2023

“ESG in 2023: A Mid-Year Review,” *Skadden Publication*, July 18, 2023

“Federal Lobbying Disclosure Act Filing System Update: Lobbyists Required To Provide Backup Email Address,” *Skadden Publication*, June 14, 2023

“States and Localities Take on Foreign-Influenced Political Spending,” *Reuters Legal News*, May 30, 2023

“Contributions to Florida Gov. Ron DeSantis’ Presidential Campaign Are Subject to Federal Pay-to-Play Rules,” *Skadden Publication*, May 24, 2023

“New Jersey Governor Signs Significant Pay-to-Play and Campaign Finance Bill,” *Skadden Publication*, April 4, 2023

“Complying With the Rules Governing 501(c)(4) Organizations: Key Issues,” *Westlaw Today*, March 27, 2023

“Reminder: New Jersey Pay-to-Play Form BE Due March 30, 2023,” *Skadden Publication*, March 7, 2023

“The SEC Pay-to-Play Rule for Investment Advisers as it Turns 12,” *Reuters Legal News*, March 1, 2023

“FEC Announces New Federal Campaign Contribution Limits,” *Skadden Publication*, February 2, 2023

“Political Contribution Disclosure Rules in Illinois, Maryland, New Jersey, Pennsylvania, Philadelphia and Rhode Island,” *Skadden Publication*, February 1, 2023