



Political Law Update

If you have any questions regarding the matters discussed in this memorandum, please contact the following attorneys or call your regular Skadden contact.

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Reminder: Illinois Pay-to-Play Registration Updates Due Quarterly

The next quarterly update required under the Illinois pay-to-play law is due August 14, 2020. As described in [earlier mailings](#), this law requires many companies with aggregate annual state bids, proposals and contracts totaling more than \$50,000 to register with the state's Board of Elections and list their covered donors.

If a company has existing contracts and no pending bids, updates to its registration are due February 14, May 14, August 14 and November 14 of each year. If a company has pending bids, updates to its registration are due within five business days or seven calendar days of the change, or the day before the contract is awarded, whichever is first.

We recommend confirming that all state contractors are properly registered and that they are confirming the accuracy of their registrations at least quarterly. Our practice has often found the following problems with registrations' covered donor lists:

- capturing too many employees, which can be problematic under the pay-to-play ban if an employee is listed who need not be;
- failing to include spouses of covered employees;
- listing affiliate companies which need not be included, such as non-U.S. affiliates, and non-operating sister companies and subsidiaries;
- failing to include a contractor's PAC; and
- the registration has not been updated in years.

Within 10 days of adding a new covered donor, a contractor must provide a copy of its registration certificate to the covered donor.

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