

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.

Ki P. Hong

Partner / Washington, D.C.
202.371.7017
ki.hong@skadden.com

Kenneth A. Gross

Partner / Washington, D.C.
202.371.7007
kenneth.gross@skadden.com

This memorandum is provided by Skadden, Arps, Slate, Meagher & Flom LLP and its affiliates for educational and informational purposes only and is not intended and should not be construed as legal advice. This memorandum is considered advertising under applicable state laws.

One Manhattan West
New York, NY 10001
212.735.3000

1440 New York Avenue, N.W.
Washington, D.C. 20005
202.371.7000

New Pennsylvania Report on Lobbyists and Lobbying Firms Disclosing Ownership Interests Due October 7

As required by Act 70 of 2021, Pennsylvania lobbyists and lobbying firms must file their initial equity reports by October 7, 2021. The reports disclose either the total value or percentage of equity held by a lobbyist or lobbying firm in a principal they lobbied on behalf of between July 1, 2020 and June 30, 2021. Even if a lobbyist or lobbying firm does not hold equity in a principal, they are still required to complete a filing disclosing they hold no equity. In the future, reports will be due annually on July 30, covering the preceding July 1 through June 30. Please note, principals are not required to file these equity reports, but still have periodic expenditure reporting obligations.

While the term “equity” is not defined under the new law, guidance from the Pennsylvania Department of State clarifies that equity means any interest or ownership, including, but not limited to: any interest in any shares (however designated, whether voting or nonvoting); membership interests (however designated, whether voting or nonvoting); partnership interests (whether general or limited); and, any other interest that confers the right to receive a share of the profits and losses of, or distributions of property of, any partnership or business. The Department of State informally suggested that it may be open to a *de minimis* threshold under which lobbyists or lobbying firms need not specify the exact value or percentage of equity held. However, the Department of State does not presently appear to have arrived at a uniform position or threshold.

Reports may be completed [here](#). Please contact us with any questions or to assist with completing your filings.

Political Law Update

Additional Contacts

Melissa L. Miles

Counsel / Washington, D.C.
202.371.7836
melissa.miles@skadden.com

Matthew Bobys

Counsel / Washington, D.C.
202.371.7739
matthew.bobys@skadden.com

Charles M. Ricciardelli

Counsel / Washington, D.C.
202.371.7573
charles.ricciardelli@skadden.com

Tyler Rosen

Counsel / Washington, D.C.
202.371.7035
tyler.rosen@skadden.com

Karina Bakhshi-Azar

Associate / Washington, D.C.
202.371.7365
karina.bakhshi-azar@skadden.com

Shayla K. Parker

Associate / Washington, D.C.
202.371.7534
shayla.parker@skadden.com

Theodore R. Grodek

Associate / Washington, D.C.
202.371.7262
theodore.grodek@skadden.com

Sam Rothbloom

Associate / Washington, D.C.
202.371.7354
sam.rothbloom@skadden.com

Kelvin Reese

Head Political Reports Analyst
202.371.7498
kelvin.reese@skadden.com

Minkeun Oh

Senior Political Reports Analyst
202.371.7499
minkeun.oh@skadden.com

Jennifer Shaw

Senior Political Reports Analyst
202.371.7426
jennifer.shaw@skadden.com

Brien Bonneville

Senior Political Compliance Analyst
202.371.7243
brien.bonneville@skadden.com

John Mannion

Political Reports Analyst
202.371.7559
john.mannion@skadden.com