



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, 2023. As described in [earlier mailings](#), Illinois 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 covered donors.

If the company has existing contracts and no pending bids, updates to the registration are due February 14, May 14, August 14 and November 14 of every year. If the company has pending bids, updates to the 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 suggest making sure that all state contractors are properly registered and are confirming the accuracy of their registrations at least quarterly. We often find the following problems with covered donor lists on registrations:

- 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 individuals.
- Listing affiliate companies that need not be, such as non-U.S. affiliates and non-operating sister companies and subsidiaries.
- Failing to include the contractor's PAC.
- Years have passed since the last update.

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

Please contact us with any questions.

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