

Political Law Compliance and Investigations Update

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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, 2024. As described in [an earlier mailing](#), Illinois law requires many companies with aggregate state bids, proposals and contracts totaling more than \$50,000 to register with the state's Board of Elections and list their "affiliated entities" and "affiliated persons."

Recent Amendments to Illinois' and the Metropolitan Pier and Exposition Authority's Pay-to-Play Laws

Illinois' and the Metropolitan Pier and Exposition Authority's (McPier) pay-to-play laws were recently amended to remove from their definitions of "affiliated entity" a political action committee for which the contractor (or an affiliated 501(c) entity) is a sponsoring entity. As a result, contractors can remove such PACs from their state pay-to-play registrations.

Also, such PACs should no longer be subject to the contribution ban and notification requirements under the Illinois pay-to-play law, and the contribution ban under the MCPier pay-to-play law.

Updating Illinois Pay-to-Play Registration

If a 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 a 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 affiliated entity and affiliated person 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.
- Years have passed since the last update.

Within 10 days of adding a new affiliated entity or affiliated person, the contractor must provide a copy of the registration certificate to said entity or person.

Please contact us with any questions.

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