

ALERT

JACK Act Compliance for 1Q 2019 LDA Reports

D. Mark Renaud, Rob Walker

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The Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives have announced that registrants under the Lobbying Disclosure Act (LDA) must promptly determine and report on form LD-2 or LD-1 any lobbyist convicted of certain corruption crimes. Amendments to January 2019 reports may be required. The forms have been updated to accommodate reporting of the new information required by the JACK Act (Justice Against Corruption on K Street Act of 2018), which was passed by Congress in late 2018 and signed by President Trump on January 3, 2019.

The specific information required by the JACK Act is the disclosure of convictions in either federal or state court of any of the following crimes committed by a registered federal lobbyist:

- An offense involving bribery,
- Extortion,
- Embezzlement,
- An illegal kickback,
- Tax evasion,
- Fraud,
- A conflict of interest,
- Making a false statement,
- Perjury, or
- Money laundering.

If any of your in-house registered lobbyists have been convicted in the past of such crimes, there is now a space on the quarterly report and, for new clients or registrants, the registration form (Form LD-1), for

Authors

D. Mark Renaud

Partner

202.719.7405

mrenaud@wiley.law

Robert L. Walker

Of Counsel, Deputy General Counsel

202.719.7585

rlwalker@wiley.law

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such information. A guide to disclosing this information is available [here](#). If none of your company's or association's in-house lobbyists have been convicted of these crimes, then registrants may answer "No" in the "Convictions Disclosure" section of the online form.

The LDA report for 1Q 2019 is due by April 22, 2019. The Secretary and Clerk have indicated that, if there are past convictions to report, that such convictions also necessitate amendments to 4Q 2018 Forms LD-2 and any registrations filed on or after January 3, 2019.

Wiley Rein stands ready to assist companies, associations, lobbying firms, and other registrants with compliance related to the JACK Act, the LDA, the Congressional gift rules, and all areas of political law. We are happy to assist clients with establishing and refining internal processes to ensure timely and accurate LDA reports. Please contact one of the authors of this alert for more information.