



Danielle Caputo and Sophia Gonsalves-Brown / October 14, 2026

Shadow Lobbying and the Lobbying Disclosure Act

The Lobbying Disclosure Act (LDA), the federal law designed to disclose the activities of individuals paid to influence government officials, fails to make lobbying truly transparent. As recent polling commissioned by CLC shows, 64% of the public does not believe that they have access to information about lobbyists working at the federal level. When the public does not believe they have necessary information to know who is influencing the government, it degrades public trust in our institutions.

In addition to the LDA's failure to make lobbying more transparent, the office responsible for enforcing the LDA appears unwilling to do so, despite 83% of people across party lines believing that the government should hold lobbyists accountable if they violate the law. Appropriately, 63% of the public does not believe that the government adequately enforces laws concerning lobbyists, as data shows that the LDA is rarely enforced. Without enforcement, a law effectively does not exist.

The lack of transparency and enforcement has contributed to the pervasive practice of "shadow lobbying." Shadow lobbyists work to influence government officials, but they do not officially register as lobbyists because they either believe that their activities do not trigger registration, or they ignore the requirement without fear of enforcement.

A CLC study found the following evidence that shadow lobbying is a pervasive problem:

- **At least 19** recent former members of Congress have worked in lobbying-adjacent roles since leaving office without registering as lobbyists
- **At least 12** strategic advisory firms are not registered as lobbyists despite providing clients with public policy and government relations services and employing over 126 former Executive and Legislative Branch officials
- **3 out of 4** of the companies with the largest lobbying expenditures in the tech industry have unregistered government affairs executives.



- **2 of the 3** companies with the largest lobbying expenditures have government affairs professionals who have been listed as top lobbyists in Washington D.C. for the last two years but are not registered lobbyists.¹

In order for the LDA to overcome the shadow lobbying issue, the law must be updated in three ways: (1) lobbying and lobbying activity definitions should change to make “shadow lobbying” reportable; (2) additional information should be required on lobbying reports, and the reports should also be easier to read; and (3) enforcement should be moved from the United States Attorney for the District of Columbia (USAO) to the Department of Justice (DOJ) headquarters.

Current Law

A 1980s scandal involving unregistered lobbying contributed to the LDA becoming law. The Wedtech scandal involved a small company that hired lobbyists, including former members of Congress, in an effort to receive lucrative government contracts. However, the company did not report any of its lobbying activity. This exposed the inadequacies of the federal lobbying laws of the time, which did not clearly define what it meant to be a lobbyist or what constituted “lobbying activity.”

A few years later, the media uncovered that five senators met with the chairman of the Lincoln Savings and Loan Association (Lincoln), who had contributed large sums of money to their campaigns. Those senators then intervened on the chairman’s behalf with the director of the Federal Home Loan Bank Board (the FHLB Board) who was investigating Lincoln. Subsequently, the FHLB Board did not take any legal action against Lincoln. This scandal raised serious questions of corruption as sitting members of Congress were effectively lobbying on behalf of

¹ *The Hill’s Top Lobbyists 2024*, The Hill (Dec. 5, 2024), <https://thehill.com/lobbying/5008875-the-hills-top-lobbyists-2024/> (listing Karan Bhatia with Alphabet Inc. and Ed Gillespie of AT&T Inc. as top corporate lobbyists); Sylvan Lane et al., *The Hill’s Top Lobbyists 2025*, The Hill (Dec. 11, 2025), <https://thehill.com/homenews/5632709-top-lobbyists-2025/> (listing Karan Bhatia with Alphabet Inc. and Ed Gillespie of AT&T Inc. as top corporate lobbyists).



a private corporation, causing members of Congress to call for Congress to be “cleaned up,” which included lobbying reform efforts.

The LDA passed in 1995 with bipartisan support and unanimous approval in the Senate. The law created definitions that made clear who must register and what activities count as lobbying. The LDA defines lobbyist as “any individual who makes two or more lobbying contacts with Congress or the Executive Branch,”² and “spends at least 20% of their time during any calendar quarter engaging in lobbying activities for compensation greater than \$3,000 from a single client.” A registered lobbyist must file quarterly reports detailing the issues they lobbied on and the amount of compensation they received to the nearest \$10,000.

“Lobbying activities” are defined as lobbying contacts and efforts to support those contacts, such as preparation and planning activities, research and other work that is intended for use in contacts at the time it is performed, and coordination with the lobbying activities with others.

“Lobbying contacts” include any written or oral communication with Congress or the Executive Branch about the “formulation, modification, or adoption” of policy or legislation. This includes communications regarding the administration or execution of a federal program or policy and the nomination or confirmation of a person to a Senate confirmed position in the government.

In 2007, Congress passed the Honest Leadership and Open Government Act of 2007 (HLOGA), which amended the LDA to require lobbyists to file quarterly lobbying disclosure reports and semiannual reports on political contributions. It also increased civil penalties and created criminal penalties for failing to comply with the disclosure requirements under the LDA.³ While the Secretary of the Senate and the Clerk of the House are responsible for monitoring LDA

² Covered officials in the Executive Branch include the president, vice president, any officer or employee, and any member of the uniformed services whose pay grade is at or above O-7. Covered congressional officials include members of Congress and all congressional employees.

³ Pub. L. No. 110-81, 121 Stat. 735 (Sept. 14, 2007), codified at 2 U.S.C. §§ 1601-1614.



compliance, the United States Attorney for the District of Columbia (USAO) is responsible for enforcing the law.

Beyond the LDA, there is another law that regulates lobbying, the Foreign Agents Registration Act (FARA), passed in 1938. FARA requires, among other things, disclosure of lobbying conducted on behalf of foreign principals, such as foreign governments and businesses. FARA disclosure is much more onerous than LDA disclosure, requiring additional information such as detailed lists of meetings and contacts. However, the LDA amended FARA to exempt lobbyists of foreign private sector principals, such as foreign corporations and individuals, from registering under FARA, instead allowing them to register under the LDA.

How the Current Law Fails

The LDA fails to uphold the public's right to make informed choices about their elected officials by failing to provide clear transparency and oversight of lobbyist activities. Specifically, LDA reports do not include any information about shadow lobbying; LDA reports are difficult to read, and the database that holds these reports does not contain some core search functions; the U.S. Attorney responsible for enforcing the LDA is failing to do so; and many foreign principal lobbyists are able to conceal detailed information about their lobbying efforts due to a poorly considered loophole. Each of these points is discussed more fully below.

Shadow Lobbying

Shadow lobbying is the practice of engaging in advocacy to influence public policy without officially registering as a lobbyist. "Shadow lobbyists" conduct advocacy to influence public policy but do not register as lobbyists because they either do not meet the income or hourly threshold or provide advice to the registered lobbyists who then lobby using that advice. These shadow lobbyists are unquestionably working to influence government decision-making, but the limited definition of registrable lobbying means the public does not know about their activities.



When those who are effectively lobbying do not have to register, it takes away the public's right to know who is influencing government officials and recognize whether their elected officials are acting on their behalf or on the behalf of lobbyists.

Shadow lobbying is a pervasive problem across the federal government:

- Government Affairs Services of Former Members of Congress
 - At least 19 former members of the 117th, 118th, and 119th Congresses are policy “consultants” or “advisors,” but are not registered as lobbyists.⁴
 - At least 14 former members of the 117th, 118th, and 119th Congresses are now registered lobbyists after previously providing unregistered consulting services or promising not to lobby the Legislative Branch within one year of leaving of office.⁵
- Government Affairs Services of Former Executive and Legislative Branch Officials
 - At least 12 strategic advisory firms offer public policy and government relations services despite not registering under the LDA, 6 of which employ former Executive Branch officials.⁶
 - 126 former executive and legislative branch officials work for those strategic advisory firms but are not currently registered as lobbyists.⁷
- Unregistered Corporate Government Affairs Executives
 - 3 out of 4 of the companies with the largest lobbying expenditures in the tech industry have unregistered government affairs executives.⁸
 - 2 of the companies with the largest lobbying expenditures have government affairs professionals who have been listed as top

⁴ See Appendix A.

⁵ *Id.*

⁶ See Appendix B.

⁷ See Appendix C.

⁸ See Appendix D.

lobbyists in Washington D.C. in both 2024 and 2025 but are not registered lobbyists.⁹

Uninformative Lobbying Reports

LDA lobbying reports, while publicly available, are difficult to decipher and do not include the most important pieces of information: namely, which lobbyists lobbied which government office on specific issues. For example, LDA reports only include the government body or division where the lobbyist lobbied (such as the department in the Executive Branch or the chamber of Congress), but the LDA does not require the registrant to list the specific government official or office they met with.

Under the LDA, filers are supposed to include bill numbers, titles, and a description of the legislation they support.¹⁰ However, oftentimes filers do not include all of the required information, instead using extremely vague descriptions that do not provide the reader any context of what they are lobbying on and even whether they are in favor or opposed. This lobbying report from Apple, Inc. from the 1st quarter of 2024 shows just how uninformative lobbying reports often are:

⁹ *The Hill's Top Lobbyists 2024*, The Hill (Dec. 5, 2024), <https://thehill.com/lobbying/5008875-the-hills-top-lobbyists-2024/> (listing Karan Bhatia with Alphabet Inc. and Ed Gillespie of AT&T Inc. as top corporate lobbyists); Sylvan Lane et al., *The Hill's Top Lobbyists 2025*, The Hill (Dec. 11, 2025), <https://thehill.com/homenews/5632709-top-lobbyists-2025/> (listing Karan Bhatia with Alphabet Inc. and Ed Gillespie of AT&T Inc. as top corporate lobbyists).

¹⁰ Instructions for Form LD-2, Lobbying Report, https://www.senate.gov/reference/resources/pdf/LD2_Instructions.pdf.



LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code TEC

16. Specific lobbying issues

Legislation and regulation regarding a framework for cybersecurity, and mitigation and prevention of cyber threats. Infrastructure Investment and Jobs Act (Public Law No: 117-58). Spectrum, including unlicensed spectrum. Commerce, Justice, Science, and Related Agencies Appropriations Act, FY 2024. Legislative Branch Appropriations, FY 2024. Financial Services Appropriations, FY 2024. Judiciary Committee Issues. Commerce Committee Issues. Advertising Issues.

17. House(s) of Congress and Federal agencies ☐ Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES

When filers do include all the information they are supposed to, the section where they enter this information is simply a textbox that does not provide any formatting options. The result is a difficult to read block of text:

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code PHA

16. Specific lobbying issues

march-in and other Bayh-Dole rights, Prescription Drug Affordability and Access Act, TRACK Act, Medicare drug price negotiation delay periods and exemptions; patent thicket reform, PREVAIL Act, Affordable and Safe Prescription Drug Importation Act, HR5539/S3131 ORPHAN Cures Act; HR5547/S476 Maintaining Investments in New Innovation Act; HR7174, PASTEUR Act, patent thicket reform, biosimilar interchangeability; Medicare drug price negotiation delay periods, expansion to commercial market, march-in and other licensing rights; Pandemic Accord access provisions, Prescription Drug Affordability and Access Act, Pandemic Accord access provisions; public pharmaceutical manufacturing.

17. House(s) of Congress and Federal agencies ☐ Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES, Commerce - Dept of (DOC), Natl Institutes of Health (NIH), Health & Human Services - Dept of (HHS)

Finally, the LDA report database is searchable, sortable, and downloadable with one glaring omission: the database is not searchable by bill. This means a user attempting to find out who has lobbied for or against a specific piece of

legislation would have no way of finding that information without combing through thousands of reports.

The ability to digest and understand lobbying reports empowers the public and good government groups to easily track lobbying activities. But the current reporting requirements make it difficult to determine who is lobbying specific representatives or specific legislation, thereby encumbering the public's ability to know who is influencing their elected officials and to recognize if the government is acting on the public or the lobbyists' behalf.

Not Enough Enforcement

Under the LDA, the Government Accountability Office (GAO) is required to annually audit lobbyists' compliance. As part of this annual audit, the GAO analyzes the actions the U.S. Attorney's Office for D.C. has taken to resolve LDA noncompliance and enforce the law. Recent audits show a concerning lack of enforcement by the USAO:

- In 2023, 74% of the referrals USAO received for noncompliant lobbyists are "pending further action because USAO could not locate the lobbyists, did not receive a response from the lobbyists after an enforcement action, or planned to conduct additional research to determine if it can locate the lobbyist."¹¹ In 2024, 63% of referrals were pending for the same reason.¹²
- 64% of the referrals received by USAO between 2016 and 2025 for lobbying firm's lack of compliance are still pending further action.¹³

¹¹ U.S. Gov't Accountability Off., GAO-24-106799, GAO Report to Congressional Committees 2023 Lobbying Disclosure 24 (2024), <https://www.gao.gov/assets/gao-24-106799.pdf>.

¹² This report does not include 2025 metrics, as these data appear to have been removed from the GAO's 2025 report. U.S. Gov't Accountability Off., GAO 25-107523, GAO Report to Congressional Committees 2024 Lobbying Disclosure 27 (2025), <https://www.gao.gov/assets/gao-25-107523.pdf>.

¹³ U.S. Gov't Accountability Off., GAO 26-108486, GAO Report to Congressional Committees 2025 Lobbying Disclosure 8 (2026), <https://www.gao.gov/assets/gao-26-108486.pdf>.



- USAO did not file a single complaint or lawsuit under the LDA in 2025, nor did the USAO initiate any civil or criminal enforcement actions against noncompliant lobbyists.¹⁴

By failing to effectively enforce the LDA, the USAO has allowed lobbyist activities in Washington to go unchecked. This means fewer lobbyists accurately report their lobbying activities, further reducing the public's ability to develop a full picture of who is being lobbied and whose priorities their public officials are prioritizing.

FARA Loophole

Another important loophole under the LDA also benefits foreign agents. An agent of a foreign private sector principal, such as a foreign corporation, can satisfy their FARA obligation by registering under the LDA instead of registering under FARA. By allowing lobbyists for foreign companies to register under the LDA and file LDA reports rather than FARA reports, this practice obfuscates the work that a foreign agent is doing. This further decreases transparency, making it harder for the public to easily determine who is lobbying on behalf of a foreign private sector principal and whether the government is prioritizing their interests over the American public.

Considerations for Reform

To increase transparency and resolve the LDA's ineffectiveness, the LDA should be amended in four ways:

1. Lobbying and lobbying activity definitions should change to make "shadow lobbying" reportable.
2. Additional information should be required on lobbying reports, and the reports should also be easier to read and searchable.
3. Enforcement should be moved from USAO to the Department of Justice (DOJ) headquarters.

¹⁴ *Id.* at 9.

4. The FARA loophole should be closed.

These solutions are not new. In 2011, the American Bar Association appointed a bipartisan task force to review federal lobbying laws and propose improvements. The task force recommended nearly all these changes to make the LDA more transparent and further decrease corruption or its appearance. Nevertheless, none of these changes have been implemented in the 15 years since they were introduced.

Expand Lobbying Definition

The current reporting threshold for lobbying allows for a significant portion of lobbying to go unreported. The requirement that an individual spends at least 20% of their time during a calendar quarter engaging in lobbying activities is a very high burden and nearly unenforceable. The only person who would really know what percentage of time someone spends lobbying is the one engaging in the lobbying activity directly. Additionally, the LDA reports fail to require disclosure of the names of the individuals who may direct the effort behind-the-scenes or who provide significant support for lobbying through strategic planning, public communications, or polling operations. By amending the lobbyist registration requirements and the definition of “lobbying activity” to include shadow lobbying, shadow lobbying could become “lobbying support” or “strategic advice” that would be reportable under the LDA.

For these reasons, the LDA should be amended to define a “lobbyist” as any individual who makes more than one lobbying contact, receives a low monetary threshold such as compensation of more than \$2,500 or makes expenditures of more than \$10,000 per quarter, and spends 12 hours or more per quarter conducting lobbying activities.

Further, a firm or organization that is required to register under the LDA should have to disclose (1) all individuals they employ who both made a lobbying contact and spent at least 12 hours during the quarterly reporting period conducting lobbying activities or lobbying support; (2) all employed individuals who engaged in lobbying activities or lobbying support at any point during their employment; and (3) any individual or entities retained by the registrant that



engaged in lobbying support, and (4) a description of the lobbying support rendered and the names of those employed by the retained individual or entity who supervised the lobbying support.

Lobbying reform efforts could amend the definition of “lobbying support” to include:

1. Strategic advice
2. Monitoring legislative and administrative developments related to lobbying goals
3. Advice and assistance with earned media related to bills or topic disclosed by the registrant in their lobbying report
4. Polling related to lobbying goals
5. Expenditures for advice on or production of public communications related to bills or issues disclosed by the registrant in their lobbying report
6. Expenditures for coalition building

Require Additional Detail in Lobbying Reports

Lobbying reports should require filers to include information that facilitates transparency, such as what specific bills the lobbyist lobbied for or against and what specific offices or government officials they met with during their lobbying efforts. Once that information has been added to the reports, the LDA report database should make bill numbers and members of Congress or agency offices applicable search terms so that the public could more easily find that information.

Additionally, the lobbying reports submitted by filers should require formatting in the lobbying activities section for better readability.

Move LDA Enforcement to an Office with More Resources

USAO’s subpar enforcement efforts do not reflect the importance of the LDA. Without more effective enforcement, amendments to the LDA would not create a substantive change. Moving LDA enforcement to the DOJ or a new independent ethics enforcement body within the Executive Branch would likely improve its enforcement for a number of reasons. First, the DOJ has more political accountability than the USAO as an Executive Branch agency that can be called upon to act. Second, the DOJ has the ability to initiate rulemakings and

adjudications to make the LDA more effective. Finally, the DOJ has more capacity to initiate and conduct investigations.

Close the FARA Loophole

To close the FARA loophole, Congress need only to amend FARA to eliminate the subsection that allows agents of foreign private sector principals to register under the LDA.

Conclusion

Lobbying plays an important role in the government's decision-making process and provides the public and other interested parties with the ability to directly address their public officials. That right should not be weakened by reforms but instead should be made more transparent.

Transparency decreases the opportunity for corruption to take hold and reduces its appearance. It also allows officials to fully understand those who are trying to influence them and provides the public with the ability to monitor who is lobbying their officials. Without transparency, public trust in our governmental institutions will continue to decline.

Appendix A: Former Members of the 117th, 118th, and 119th Congresses

Former Members That Are Now Unregistered Policy Consultants

Sen. Roy Blunt (R-MO) (HBS)

- Our Team: Senator Roy Blunt, HBS, <https://hbstrategies.us/senator-roy-blunt/> (last visited Oct. 7, 2026) (describing fmr. Sen. Blunt as Chairman of the firm's Leadership Strategies Advisory Services).
- HBS Federal, HBS, <https://hbstrategies.us/services/federal-government-affairs/> (last visited Oct. 7, 2026) (listing fmr. Sen. Blunt as a member of the team that works with clients to "advance identified priorities before senior congressional staff, Members of Congress, and Federal Agency decision makers.")
- Search for Lobbyist "Blunt, Roy" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Matt Cartwright (D-PA08) (Munley Law)

- Matthew A. Cartwright, Munley Law, <https://munley.com/our-attorneys/matthew-cartwright/> (last visited Oct. 7, 2026) (showing that fmr. Rep. Cartwright "provides strategic insight into complex litigation, regulatory matters, and public policy issues that impact individuals and businesses across Pennsylvania and beyond.")
- Search for Lobbyist "Cartwright, Matt" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Marcia Fudge (D-OH11) (Taft, Stettinius & Hollister LLP)

- Marcia L. Fudge, Taft Law, <https://www.taftlaw.com/people/marcia-l-fudge/> (last visited Oct. 7, 2026) (noting that "Marcia is a partner in Taft's Public Affairs Strategies Group and serves as firmwide chair of public policy and co-chair of the Government Resource and Response Group. She brings more than five decades of experience working with lawmakers, elected officials, key staff, and coalitions at the local, state, and federal levels. ")
- Search for Lobbyist "Fudge, Marcia" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Mike Gallagher (R-WI08) (Palantir Technologies Inc.)

- Lizette Chapman, *Former GOP Leader Mike Gallagher Joins Palantir as Head of Defense*, Bloomberg (Aug. 22, 2024), <https://archive.is/F09IA> (noting fmr. Rep. Gallagher will "lead Palantir's defense business, selling its data analysis technology to the US government and allied countries.")

- Palantir Technologies (@PalantirTech), X Post (We are thrilled to welcome former Congressman @chaimang) (Aug. 22, 2024), <https://x.com/PalantirTech/status/1826623135258480714> (quoting CEO Alex Karp: “Mike’s unique talents have helped to shape U.S. policy towards our adversaries. I am delighted he is joining Palantir, and am certain he will play an invaluable role for Palantir and our mission partners.”)
- Search for Lobbyist “Gallagher, Mi” (no relevant results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Mike Garcia (R-CA27) (WestExec Advisors)

- The Honorable Mike Garcia, WestExec Advisors, <https://westexec.com/mike-garcia/> (last visited Oct. 7, 2026) (listing fmr. Rep. Garcia as a Principal).
- About, WestExec Advisors, <https://westexec.com/#about> (last visited Oct. 7, 2026) (describing the firm as “a strategic advisory firm with a global bench of over 100 pedigreed professionals with decades of experience at the highest levels of government and industry.”)
- Search for Lobbyist “Garcia, Mi” (no results relevant returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Garret Graves (R-LA06) (AI Infrastructure Coalition)

- About: Meet the Co-Chairs, AI Infrastructure Coal., <https://aiinfrastructurecoalition.org/about/> (last visited Oct. 7, 2026) (listing fmr. Rep. Graves as a Co-Chair).
- About Us, AI Infrastructure Coalition, <https://aiinfrastructurecoalition.org/> (last visited Oct. 7, 2026) (noting: “The AI Infrastructure Coalition (AIIC) brings together companies ... to collectively shape the future of AI infrastructure policy.”)
- Search for Lobbyist “Graves, Garret” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Mark Green (R-TN07) (Prosimos)

- Sarah Grace Taylor, *Former Congressman Mark Green and Lobbyist Partner Sued for Guyana Business Venture*, Nashville Banner (Mar. 5, 2026), <https://nashvillebanner.com/2026/03/05/mark-green-marc-hebert-prosimos-guyana-lawsuit/> (noting: “[I]ast spring, Green established a company called Prosimos alongside lobbyist and corporate attorney Marc C. Hebert.”)
- Strategic Government Solutions, Prosimos, <https://www.prosimos.com/solutions/government/> (last visited Oct. 7, 2026) (describing the firm’s “government-focused services” as “provid[ing] the strategic counsel and on-the-

ground access needed to build powerful public-private partnerships, secure critical government contracts, and shape policy that enables innovation and growth.”)

- Search for Lobbyist “Green, Mark” (no relevant results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Sen. George Helmy (D-NJ) (RWJBarnabas Health)

- Leadership at RWJBarnabas Health, RWJBarnabas Health, <https://www.rwjbh.org/why-rwjbarnabas-health-/leadership/> (last visited Sep. 22, 2026) (listing Helmy as the Executive Vice President, Chief Corporate Affairs Officer).
- Matthew Fazelpoor, *Helmy Promoted to Expanded Role at RWJBarnabas*, NJBIZ (June 10, 2026), <https://njbiz.com/helmy-rwjbarnabas-health-chief-corporate-affairs/> (noting that the division that Helmy leads “brings together government affairs, communications, community health initiatives, philanthropy, regulatory strategy and strategic partnerships.”)
- Search for Lobbyist “Helmy, George” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Jaime Herrera Beutler (R-WA03) (Children's Hospital Association)

- Press Release, Children’s Hosp. Ass’n, Former U.S. House Representative Jaime Herrera Beutler Joins Children’s Hospital Association as Strategic Advisor (Jan. 25, 2023), <https://www.childrenshospitals.org/news/newsroom/2023/01/jaime-herrera-beutler-joins-cha> (quoting CEO Mark Wietecha: “We welcome Jaime and are eager to add her insights and expertise in advancing the bipartisan advocacy efforts of children’s hospitals.”)
- Search for Lobbyist “Herrera, Jaime” or “Beutler, Jaime” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Jacob LaTurner (R-KS02) (PLUS Communications)

- Jake LaTurner, PLUS Communications, <https://pluspr.com/team/jake-laturner/> (last visited Oct. 8, 2026) (noting: “Jake brings extensive experience in Capitol Hill and state-level politics to the firm’s public affairs practice.”)
- About, PLUS Communications, <https://pluspr.com/about/>, (last visited Oct. 8, 2026) (noting: “[o]ur focus on winning means PLUS understands how to reach every audience for clients, whomever they are and wherever they are – from elected officials to voters to employees.”)
- Search for Lobbyist “LaTurner, Jacob” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Sen. Joe Manchin (I-WV) (Bondi Partners)

- Joe Manchin, U.S., Bondi Partners, <https://www.bondipartners.com/teams/joe-manchin-us/> (last visited Oct. 8, 2026) (listing Sen. Manchin as a “Senior Advisor.”)
- Advocacy, Bondi Partners, <https://www.bondipartners.com/advocacy/> (last visited Oct. 8, 2026) (noting: “Bondi Partners Advocacy leverages an expert understanding of legislation, policy making and deep political networks in Australia, the U.S. and abroad to inform and support corporate leaders.”)
- Search for Lobbyist “Manchin, Joe” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 7, 2026).

Fmr. Rep. Patrick McHenry (R-NC10) (Lazard; Coalition for Prediction Markets)

- Patrick McHenry, Lazard, <https://www.lazard.com/our-people/patrick-mchenry/> (last visited Oct. 8, 2026) (describing fmr. Rep. McHenry as a “Senior Advisor” that “advises on public policy, financial services, FinTech, and AI-related matters.”)
- Leadership, Coal. for Prediction Markets, <https://www.coalitionforpredictionmarkets.com/leadership> (last visited Oct. 8, 2026) (listing fmr. Rep. McHenry as Senior Advisor).
- Our Mission, Coal. for Prediction Markets, <https://www.coalitionforpredictionmarkets.com/mission> (last visited Oct. 8, 2026) (describing the organization as “a unified industry voice working with policymakers, regulators, and the public...”).
- Search for Lobbyist “McHenry, Patrick” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Fmr. Rep. Sean Patrick Maloney (D-NY18) (Coalition for Prediction Markets)

- Leadership, Coal. for Prediction Markets, <https://www.coalitionforpredictionmarkets.com/leadership> (last visited Oct. 8, 2026) (listing fmr. Rep. Maloney as a President and CEO).
- Our Mission, Coal. for Prediction Markets, <https://www.coalitionforpredictionmarkets.com/mission> (last visited Oct. 8, 2026) (describing the organization as “a unified industry voice working with policymakers, regulators, and the public...”).
- Search for Lobbyist “Maloney, Sean” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Sen. Kyrsten Sinema (I-AZ) (Hogan Lovells Cadwalader; AI Infrastructure Coalition)

- Senator Krysten Sinema, Hogan Lovells Cadwalader, <https://www.hlc.com/en/professionals/sinema-kyrsten> (last visited Oct. 8, 2026) (describing Sen. Sinema as a Senior Advisor the firm's Government Relations and Public Affairs practice.)
- About: Meet the Co-Chairs, AI Infrastructure Coal., <https://aiinfrastructurecoalition.org/about/> (last visited Oct. 8, 2026) (listing Sen. Sinema as a Co-Chair).
- About Us, AI Infrastructure Coalition, <https://aiinfrastructurecoalition.org/> (last visited Oct. 8, 2026) (noting: "The AI Infrastructure Coalition (AIIC) brings together companies ... to collectively shape the future of AI infrastructure policy.")
- Search for Lobbyist "Sinema, Krysten" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Sen. Debbie Stabenow (D-MI) (Liberty Partners Group)

- Senator Debbie Stabenow, Liberty Partners Group, <https://www.libertypartnersgroup.com/liberty-partners-team/senator-stabenow> (last visited Oct. 8, 2026) (listing fmr. Sen. Stabenow as a Senior Policy Advisor).
- About Us, Liberty Partners Group, <https://www.libertypartnersgroup.com/about-us> (last visited Oct. 8, 2026) (describing the firm as "a strategic consulting firm with a bipartisan team [w]ith deep ties and experience at both the federal and state levels of government.")
- Search for Lobbyist "Stabenow, Deb" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Sen. Pat Toomey (R-PA) (Coinbase Global Advisory Council)

- Global Advisory Council, Coinbase, <https://investor.coinbase.com/governance/Global-Advisory-Council/default.aspx> (last visited Oct. 8, 2026) (listing fmr. Sen. Toomey as a member).
- Press Release, Coinbase, Coinbase Establishes Global Advisory Council (May 12, 2023), <https://www.coinbase.com/zh-cn/blog/coinbase-establishes-global-advisory-council> (stating that the Council "will strengthen our efforts with stakeholders across the community ... and make the case to stakeholders around the world that crypto and blockchain will usher in a new era of the internet based on decentralized protocols.")
- Search for Lobbyist "Toomey, Pat" (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Fmr. Rep. Brad Wenstrup (R-OH02) (Americans for Health Excellence)

- About Us, Americans for Health Excellence, <https://americansforhealthexcellence.org/about-us/> (last visited Oct. 8, 2026) (describing fmr. Rep. Wenstrup as the Executive Director).
- Americans for Health Excellence, <https://americansforhealthexcellence.org/> (last visited Oct. 8, 2026) (noting that the organization “champion[s] market-based policies that lower costs for patients, hold healthcare system actors accountable through competition, transparency, and market-based reforms, and ensure that America remains the best place in the world to be a patient.”)
- Search for Lobbyist “Wenstrup, Brad” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Fmr. Rep. Susan Wild (D-PA07) (APCO)

- Susan Wild, APCO Worldwide, <https://apcoworldwide.com/people/susan-wild/> (last visited Oct. 8, 2026) (listing fmr. Rep. Wild’s areas of expertise as “Government” and “Public Affairs and Government Relations”).
- Services: Public Affairs & Government Relations, <https://apcoworldwide.com/services/public-affairs/> (last visited Oct. 8, 2026) (describing the practice as “hav[ing] the subject matter experts and collective political acumen to provide clients with fresh perspectives, guidance and strategic counsel to meet their goals.”)
- Search for Lobbyist “Wild, Susan” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Fmr. Rep. Ted Yoho (R-FL03) (Kyle House Group)

- Congressman Ted Yoho, Kyle House Group, <https://www.kylehousegroup.com/ted-yoho> (last visited Oct. 8, 2026) (listing fmr. Rep. Yoho as a Senior Advisor).
- Advocacy, Kyle House Group, <https://www.kylehousegroup.com/advocacy> (last visited Oct. 8, 2026) (noting the firm “advocates for our clients’ public policy agendas before the U.S. Congress and the Executive branch through direct lobbying activities and engagement. [Kyle House Group] works to positively shape legislation, government policies and regulations through education, relationship building and advocacy efforts.”)
- Search for Lobbyist “Yoho” (no results returned), U.S. Congress, Lobbying Disclosure Act Database, U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

Former Members That Registered as Lobbyists Within One Year of Leaving Congress or After Serving as Unregistered Policy Consultants

Fmr. Rep. Larry Bucshon (R-IN) (Holland & Knight)

- Taylor Giorno, Lobbying World: Former Lawmakers Find New Homes in Lobbying Firms, The Hill (Jan. 16, 2025), <https://thehill.com/lobbying/5087286-lobbying-world-former-lawmakers-find-new-homes-in-lobbying-firms/> (showing Bucshon joined Holland & Knight as a “senior policy adviser in the firm’s public policy and regulation group” in January 2025).
- Search Results for “Bucshon, Larry”, U.S. Congress LDA.gov, <https://perma.cc/WV3E-3VU9> (last visited Oct. 7, 2026) (showing fmr. Rep. Bucshon’s first LDA registration was filed on December 18, 2025).

Fmr. Sen. Richard Burr (R-NC08) (DLA Piper)

- Press Release, DLA Piper, DLA Piper Welcomes Former US Senator Richard Burr to its Regulatory and Government Affairs Practice Group (Feb. 7, 2023), <https://www.dlapiper.com/en-us/news/2023/02/dla-piper-welcomes-richard-burr-to-regulatory-government-affairs-practice> (showing Burr joined the firm as “a Principal Policy Advisor and Chair of the Health Policy Strategic Consulting Practice to provide policy advice, strategic consulting, and a wide range of related services.”)
- Search Results for “Burr, Richard”, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/M99A-ACKL> (last visited Oct. 7, 2026) (showing fmr. Sen. Burr’s first LDA registration was filed on March 17, 2025).

Fmr. Rep. Cheri Bustos (D-IN17) (Mercury)

- Press Release, Mercury, Mercury Welcomes Former Congresswoman Cheri Bustos as Co-Chair (Jan. 23, 2023), <https://www.mercuryllc.com/announcements/mercury-welcomes-former-congresswoman-cheri-bustos-as-co-chair/> (showing Bustos joined the firm as “Co-Chair of the Washington, D.C., office” in January 2025).
- Lobbying Report for Registrant “Mercury Public Affairs, LLC” for Client “County of Winnebago,” Q3 2023, U.S. Congress Lobbying Disclosure Act Database (Oct. 18, 2023), <https://lda.gov/filings/public/filing/e6e5b495-64d6-4bc9-ab2d-c35da09e0ec8/print/> (showing fmr. Rep. Bustos appeared on an LDA disclosure report less than one year after leaving Congress).

Fmr. Rep. G. K. Butterfield (D-NC01) (McGuireWoods)

- Press Release, McGuireWoods Consulting, Congressman G.K. Butterfield Joins McGuireWoods Consulting’s Federal Public Affairs Team (Jan. 3, 2023), <https://mwcllc.com/blog/congressman-g-k-butterfield-joins-mcguirewoods-consultings->

[federal-public-affairs-team](#) (showing fmr. Rep. Butterfield joined the firm as a “Senior Advisor” in January 2023).

- Lobbying Registration for Registrant “McGuireWoods Consulting (A Subsidiary of McGuireWoods LLP)” for Client “Hampton University,” Q2 2023, U.S. Congress Lobbying Disclosure Act Database (July 19, 2023), <https://lda.gov/filings/public/filing/e4fd3bcc-4a84-4ae7-bb05-cf4178d53e04/print/> (showing fmr. Rep. Butterfield appeared on an LDA disclosure report less than one year after leaving Congress).

Fmr. Rep. Peter DeFazio (D-OR04) (Summit Strategies)

- Press Release, Summit Strategies, Former Transportation and Infrastructure Chairman Peter DeFazio to Collaborate with Lobbying Firm Summit Strategies (Jan. 24, 2023), <https://summitstrategies.us/former-transportation-and-infrastructure-chairman-peter-defazio-to-collaborate-with-lobbying-firm-summit-strategies/> (showing DeFazio joined the firm as a “Senior Strategic Advisor” and also launched his own consulting practice in January 2023).
- Search Results for “DeFazio, Peter”, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/FK69-EJ2V> (last visited Oct. 7, 2026) (showing fmr. Rep. DeFazio’s first LDA registration was filed on February 12, 2024).

Fmr. Rep. Mike Doyle (D-PA18) (K&L Gates)

- Press Release, K&L Gates, K&L Gates Adds Recently Retired U.S. Congressman Mike Doyle to Public Policy and Law Practice (Dec. 27, 2022), <https://www.klgates.com/KL-Gates-Adds-Recently-Retired-US-Congressman-Mike-Doyle-to-Public-Policy-and-Law-Practice-12-27-2022> (showing fmr. Rep. Doyle joined the firm as a “government affairs counselor” in December 2022).
- Lobbying Registration for Registrant “K&L Gates” for Client “Walnut Capital Management, Inc.,” U.S. Congress Lobbying Disclosure Act Database (Mar. 1, 2023), <https://lda.gov/filings/public/filing/abfb3de1-3e86-4794-a529-0ac1f7bdc7fe/print/> (showing fmr. Rep. Doyle appeared on an LDA registration less than one year after leaving Congress).

Fmr. Rep. Jeff Duncan (R-SC03) (Covenant Government Affairs)

- John Roberti, LinkedIn Post (“Excited to announce that former Congressman Jeff Duncan has joined Covenant Government Affairs...”) (Jan. 6, 2025) <https://archive.is/wip/IXBtm> (showing fmr. Rep. Duncan joined the firm as a “Managing Director” in January 2025).
- Search Results for “Duncan, Jeff”, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/A26G-NNES> (last visited Oct. 7, 2026) (showing fmr. Rep. Duncan’s first LDA registration was filed on March 11, 2026).

Fmr. Rep. John Katko (R-NY24) (HillEast Group)

- Kevin McCauley, Ex-Rep. Katko Joins HillEast Group, O'Dwyer's (Feb. 1, 2023), <https://www.odwyerpr.com/story/public/19118/2023-02-01/ex-rep-katko-joins-hilleast-group.html> (showing fmr. Rep. Katko joined the firm as a "senior advisor" in February 2023).
- Lobbying Registration for Registrant "Hill East Group, LLC" for Client "Security Scorecard," U.S. Congress Lobbying Disclosure Act Database (May 9, 2023), <https://lda.gov/filings/public/filing/64ae42cd-ac31-47c9-a2e1-6d2a9b726922/print/> (showing fmr. Rep. Katko on a lobbying registration less than one year after he left Congress).

Fmr. Rep. Ron Kind (D-WI03) (Arnold & Porter)

- Press Release, Arnold & Porter, Former US Representative Ron Kind Joins Arnold & Porter's Legislative & Public Policy Practice as Senior Policy Advisor (Feb. 6, 2023), <https://www.arnoldporter.com/en/perspectives/news/2023/02/ron-kind-joins-legislative-practice> (showing fmr. Rep. Kind joined the firm in February 2023).
- Lobbying Registration for Registrant "Arnold & Porter Kaye Scholer LLP" for Client "Employee-owned S Corporations of America," U.S. Congress Lobbying Disclosure Act Database (March 15, 2023), <https://lda.gov/filings/public/filing/95a29c9b-c696-4b07-a867-6a0722de1790/print/> (showing fmr. Rep. Kind appeared on a lobbying registration less than one year after he left Congress).

Fmr. Rep. Ed Perlmutter (D-CO07) (Holland & Knight)

- Press Release, Holland & Knight, Former Congressman Ed Perlmutter of Colorado Joins Holland & Knight (Jan. 5, 2023), <https://www.hklaw.com/en/news/pressreleases/2023/01/former-congressman-ed-perlmutter-of-colorado> (showing fmr. Rep. Perlmutter joined Holland & Knight as a "partner in its Public Policy & Regulation Group" in January 2023).
- Lobbying Report for Registrant "Holland & Knight LLP" for Client "Tricon Residential Inc.," Q3 2023, U.S. Congress Lobbying Disclosure Act Database (Oct. 19, 2023), <https://lda.gov/filings/public/filing/79829e76-019f-41ad-a0f9-2484c880fc8f/print/> (showing fmr. Rep. Perlmutter appeared on a lobbying report less than one year after he left Congress).

Fmr. Rep. Tom Reed (R-NY23) (Prime Policy Group)

- Caitlin Oprysko, Reed Heads for the Exits – and for K Street, Politico (May 11, 2022), <https://www.politico.com/newsletters/politico-influence/2022/05/11/reed-heads-for-the-exits-and-for-k-street-00031839> (showing fmr. Rep. Reed joined Prime Policy Group as "vice chair" in May 2022).

- Search Results for Registrant “Prime” and Lobbyist “Reed, Tom”, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/D8HV-L33Q> (last visited Oct. 7, 2026) (showing fmr. Rep. Reed’s first LDA registration was filed on July 18, 2023).

Fmr. Rep. Chris Stewart (R-UT02) (Skyline Capitol)

- Erin Alberty, Chris Stewart Launches New Lobbying Firm Days After Leaving Congress, Axios (Sep. 20, 2023), <https://www.axios.com/2023/09/20/chris-stewart-skyline-lobbying-congress> (showing fmr. Rep. Stewart launched the firm in September 2023, shortly after he resigned from office).
- Search Results for Registrant “Skyline” and Lobbyist “Stewart, Chris”, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/NXV8-3KJ7> (last visited Oct. 7, 2026) (showing fmr. Rep. Stewart’s first LDA registration was filed on March 21, 2025).

Fmr. Rep. Steve Stivers (R-OH15) (Ohio Chamber of Commerce)

- Press Release, Ohio Chamber of Commerce, Ohio Chamber of Commerce Names Steve Stivers New President and CEO (Apr. 19, 2021), <https://chillicotheohio.com/ohio-chamber-of-commerce-names-steve-stivers-new-president-and-ceo/> (showing fmr. Rep. Stivers joined the organization as the president and CEO effective May 2021).
- Search Results for “Stivers, St” U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/7HDX-4E35> (last visited Oct. 7, 2026) (showing fmr. Rep. Stivers’ first LDA registration was filed on June 2, 2022).

Fmr. Rep. Filemon Vela (D-TX34) (Akin Gump)

- Karl Evers-Hillstrom, Lobbying World, The Hill (Mar. 30, 2022), <https://thehill.com/business-a-lobbying/lobbying-hires/600184-lobbying-world/> (showing fmr. Rep. Vela planned to join Akin Gump’s public policy practice after leaving Congress).
- Lobbying Registration for Registrant “Akin, Gump, Strauss, Hauer & Feld” for Client “Port of Corpus Christi Authority,” U.S. Congress Lobbying Disclosure Act Database (May 2, 2022), <https://lda.gov/filings/public/filing/c7b85c48-d132-4cbe-bc06-969be166b1c6/print/> (showing fmr. Rep. Perlmutter appeared on a lobbying registration less than one year after he left Congress).

Appendix B: Strategic Advisory Firms

Unregistered strategic advisory firms offering public policy and/or government relations services¹:

- *45 North Strategies*, a “global strategic advisory firm operating at the intersection of business and government.”²
- *202 Consulting*, a “premier strategic advocacy firm dedicated to amplifying influence through strategic partnerships. We leverage a robust network of think tanks, trade associations, and thought leaders to ensure our clients' voices shape the policy and industry conversations that matter most. Our mission is to position our clients at the center of influential discussions, driving meaningful impact through targeted advocacy, expert representation, and thought leadership.”³
- *Alta Strategies*, a “policy consulting and strategic advisory firm offering innovative policy solutions for emerging leaders in the healthcare, life science, and biotech spheres.”⁴
- *American Global Strategies*, a “[s]trategic [g]lobal [a]dvisory [f]irm” that was “designed from the ground up with the relationships, perspective, and credibility to operate effectively in today’s Washington, not retrofitted to it.”⁵
- *Brunswick Group*,⁶ a “global advisory firm”⁷ that helps “navigate the complex and dynamic factors that influence public opinion, public policy outcomes.”⁸
- *Funderburke Group*, a “premier strategic advisory firm based in the Greater Washington, D.C. area, delivering trusted counsel and transformative solutions in Government, Public Policy, and Leadership Development.”⁹

¹ Search for Registrant (no results returned for “45 North Strategies,” “202 Consulting,” “Alta Strategies,” “American Global Strategies,” “Funderburke Group,” “Heartland Global Advisors,” “K Street Consulting,” “Phase 2 Consulting,” “Skytree Advisory,” or “WestExec”), U.S. Congress, Lobbying Disclosure Act Database, <https://lda.gov/filings/public/filing/search/> (last visited Oct. 8, 2026).

² About, 45 North Strategies, <https://www.45northstrategies.com/about> (last visited Oct. 8, 2026).

³ Home, 202 Consulting, <https://202consultingdc.com/> (last visited Oct. 8, 2026).

⁴ Alta Strategies, LinkedIn Profile, <https://archive.is/AFTLD> (last visited Sep. 20, 2026).

⁵ Home, American Global Strategies, <https://americanglobalstrategies.com/> (last visited Oct. 8, 2026).

⁶ The Brunswick Group was registered under the LDA between 2004 and 2007. Search for Registrant Name: Brunswick Group, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/5QJD-XT44> (last visited Oct. 7, 2026) (showing that the group’s most recent activity was a termination report filed on October 28, 2008). The group is currently registered under the Foreign Agents Registration Act (FARA). Active Registrant Search for “Brunswick”, Dept. of Justice, https://efile.fara.gov/ords/fara/f?p=1381:200:::200:P200_REG_NUMBER:6826 (last visited Oct. 8, 2026).

⁷ Home, Brunswick Group, <https://www.brunswickgroup.com/> (last visited Oct. 8, 2026).

⁸ Our Work: Public Affairs, Regulation & Geopolitical, Brunswick Group, <https://www.brunswickgroup.com/our-work/> (last visited Oct. 8, 2026).

⁹ About Us, The Funderburke Group, <https://fungrp.com/about-us/> (last visited Oct. 8, 2026).

- *Heartland Global Advisors*, a firm founded “to help companies and organizations understand a wide range of regional and functional policy issues, conduct due diligence, engage the USG and foreign governments, and develop partnerships in both the public and private sector.”¹⁰
- *K Street Consulting*, a “full-service public affairs and governmental relations firm dedicated to providing comprehensive public policy, strategic counsel and advocacy services to private and public sector organizations that desire to influence public opinion, government policymakers or community leaders.”¹¹
- *Phase 2 Consulting*, a “strategic advisory firm that helps corporations, institutions, and public sector leaders navigate issues where business objectives, government priorities, community interests, and public trust intersect.”¹²
- *SKDK*,¹³ a firm that “help[s] clients advocate successfully in state capitals and the nation’s capital ... and influenc[es] public policy through storytelling and media relations.”¹⁴
- *Skytree Advisory*, a “strategic public affairs and government relations consultancy based in Washington, DC ... the firm’s specialty is in helping innovative companies navigate public affairs and government relations challenges.”¹⁵
- *WestExec*, a “strategic advisory firm” with advisors that “maintain ongoing relationships across government, industry, academia, and the international community. These active networks give clients visibility into geopolitical developments, stakeholder perspectives, and potential inflection points before they materialize.”¹⁶

¹⁰ About Company, Heartland Global Advisors, <https://heartlandglobaladvisors.com/#6be6d150-08c9-48e0-be76-d1545c666f07> (last visited Oct. 8, 2026).

¹¹ About, K Street Consulting, LLC, <https://kstreet.us.com/about/> (last visited Oct. 8, 2026).

¹² About, Phase 2 Consulting, <https://www.phase2-consulting.com/about> (last visited Oct. 8, 2026).

¹³ SKDK was registered under the LDA in 2019. Search for Registrant Name: SKDK, U.S. Congress Lobbying Disclosure Act Database, <https://perma.cc/J8Z5-7JWK> (last visited Oct. 8, 2026) (showing the group’s most recent disclosure was a termination report filed on Oct. 3, 2019).

¹⁴ Services: Public Affairs, SKDK, <https://skdknick.com/services/public-affairs/> (last visited Oct. 8, 2026).

¹⁵ About Us, Skytree Advisory, <https://www.skytreeadvisory.co/03-about> (last visited Oct. 8, 2026).

¹⁶ About, WestExec Advisors, <https://westexec.com/#about> (last visited Oct. 8, 2026).

Appendix C: Former Government Officials Employed at Strategic Advisory Firms

Unregistered executive and legislative branch officials employed at strategic advisory firms:¹

Firm	Name	Executive or Legislative Branch Position(s)
<i>American Global Strategies</i>	Leo Ayala ²	Senior International Trade Specialist, Dept. of Commerce
<i>American Global Strategies</i> ³	Jason Chaffetz	Member, House of Representatives
<i>American Global Strategies</i>	Alexander B. Gray	Dep. Asst. to the President; Chief of Staff of WH NSC; Special Asst. to the President for the Defense Industrial Base at NEC; Dir. for Oceania and Indo-Pacific Security at NSC; Senior Advisor to fmr. Rep. J. Randy Forbes (R-VA)
<i>American Global Strategies</i>	Robert Greenway	Dep. Asst. to the President and Sr. Dir. of NSC's Middle Eastern and North African Affairs Directorate
<i>American Global Strategies</i>	Arthur Herman	Senior Advisor to National Security Advisor
<i>American Global Strategies</i>	Larry Kudlow	Asst. to the Pres. for Economic Policy; Dir. of the NEC
<i>American Global Strategies</i>	Marina Macklin	Policy Advisor, Treasury
<i>American Global Strategies</i>	David Malpass	Undersecretary for International Affairs, Treasury
<i>American Global Strategies</i>	Ambassador Ed McMullen	Ambassador to Switzerland and Liechtenstein
<i>American Global Strategies</i>	Robert C. O'Brien	National Security Advisor
<i>American Global Strategies</i>	Katie Price	Press Asst., WH
<i>American Global Strategies</i>	Anthony Ruggiero	Dep. Asst. to the President for National Security Affairs and NSC Senior Dir. for Counterproliferation and Biodefense
<i>American Global Strategies</i>	Manisha Singh	Asst. Sec. for the Bureau of Economic and Business Affairs, State
<i>American Global Strategies</i>	James Skinner	Special Asst. to the National Security Advisor; Presidential Appointee, Defense

¹ Unless otherwise noted, former executive and legislative branch were positions obtained from biographies on relevant firm's website.

² Leo Ayala, LinkedIn Profile, <https://perma.cc/7ECV-3N2G> (last visited Oct. 7, 2026).

³ Our Team, American Global Strategies, <https://americanglobalstrategies.com/team/> (last visited Oct. 13, 2026).

Firm	Name	Executive or Legislative Branch Position(s)
<i>American Global Strategies</i>	Admiral Gregory J. Slavonic	Undersecretary, Navy
<i>American Global Strategies</i>	Nick Snyder	Chief of Staff to Dep. Sec. of State; Special Advisor for Asia and the Pacific to the VP
<i>American Global Strategies</i>	Robert Swope	Special Asst. to the Dep. Asst. Sec. of the Army for Strategy and Acquisition Reform
<i>American Global Strategies</i>	Erin Walsh	Dep. Asst. to the President and Senior Dir. for Africa and for International Organizations at the NSC; Asst. Sec. of Commerce for Global Markets; Dir. General of the US and Foreign Commercial Service
<i>American Global Strategies</i>	Madeleine Westerhout	Special Asst. and Executive Asst. to the President; Dir. of Oval Office Operations
<i>American Global Strategies</i>	Chad Wolf*	Acting Sec., Dept. of Homeland Security
<i>Brunswick Group</i> ⁴	Kate Bedingfield	WH Communications Dir.
<i>Brunswick Group</i>	Lanhee J. Chen*	Member, Social Security Advisory Board
<i>Brunswick Group</i>	Patti Solis Doyle*	Senior Advisor to the First Lady (Clinton)
<i>Brunswick Group</i>	Andrew Gernt	Communications Dir., fmr. Rep. David Cicilline
<i>Brunswick Group</i>	Lauren Oppenheimer	Chief of Staff to the Comptroller, Office of the Comptroller of the Currency; Dir. of Legislative and Intergovernmental Affairs, Commerce
<i>Brunswick Group</i>	Admiral Michael Rogers	Director, National Security Agency
<i>Brunswick Group</i>	Sharon Soderstrom	Chief of Staff to Sen. McConnell
<i>Brunswick Group</i>	Doug Sosnik*	WH Sr. Advisor for Policy and Strategy; WH Political Director; WH Dep. Leg. Director
<i>Brunswick Group</i>	Neal Wolin	Acting Sec., Treasury; Dep. Sec., Treasury
<i>Heartland Global Advisors</i> ⁵	Mark D. Simakovsky	Dep. Asst. Administrator for Europe and Eurasia, USAID
<i>SKDK</i>	Pia Carusone	Chief of Staff, fmr. Rep. Giffords; Asst. Sec. for Public Affairs, Dept. of Homeland Security
<i>SKDK</i> ⁶	Doug Thornell	Advisor, Sen. Chris Van Hollen; Advisor, Congressional Black Caucus
<i>The Funderburke Group</i> ⁷	Joe Funderburke	Dir. of Strategic Planning, NSC

⁴ Our Experts, Brunswick Group, <https://www.brunswickgroup.com/our-experts/> (last visited Oct. 13, 2026).

⁵ Leadership, Heartland Global Advisors, <https://heartlandglobaladvisors.com/#f37f6c81-417a-406f-9d33-ae20d54bec9d> (last visited Oct. 13, 2026).

⁶ Our People, SKDK, <https://skdknick.com/about/people/> (last visited Oct. 13, 2026).

⁷ Joe Funderburke Author Biography, Small Wars Journal, <https://smallwarsjournal.com/author/joe-funderburke/> (last visited Oct. 13, 2026).

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i> ⁸	Ambassador Gina Abercrombie-Winstanley	U.S. Ambassador to the Republic of Malta; Chief Diversity and Inclusion Officer, Dept. of State
<i>WestExec Advisors</i>	Sergio Aguirre	Chief of Staff to the U.S. Ambassador to the UN; Director, NSC
<i>WestExec Advisors</i>	Kate Almquist Knopf	Dir. of the Africa Center for Strategic Studies, Dept. of Defense; Asst. Administrator for Africa, USAID
<i>WestExec Advisors</i>	Heidi Avery	Career CIA Executive; Dep. Asst. to the President for Homeland Security, NSC
<i>WestExec Advisors</i>	Ambassador Erica Barks Ruggles	Head of U.S. Mission to UNESCO; Ambassador to Rwanda, U.S. Dept. of State
<i>WestExec Advisors</i>	Lincoln Bloomfield	Special Envoy and Asst. Sec. of State for Political Military Affairs, U.S. Dept. of State
<i>WestExec Advisors</i>	Major General Charlie Bolden, USMC (Ret.)*	Administrator and Astronaut, NASA
<i>WestExec Advisors</i>	Harry G. Broadman	Chief of Staff, President's Council of Economic Advisors; U.S. Ass. Trade Representative
<i>WestExec Advisors</i>	General Vincent K. Brooks, USA (Ret.)	Commander of the UN Command, Combined Forces Command, and U.S. Forces Korea
<i>WestExec Advisors</i>	Nitin Chadda	Senior Advisor to the Sec. of Defense; NSC
<i>WestExec Advisors</i>	Ron Clark	Dep. Under Sec., Dept. of Homeland Security; Acting Senior Dir. and Director, NSC
<i>WestExec Advisors</i>	General Rich Clarke, USA (Ret.)	Commander, U.S. Special Operations Command
<i>WestExec Advisors</i>	John Conger	Acting Asst. Sec. for Energy, Installations and Environment, U.S. Dept. of Defense
<i>WestExec Advisors</i>	John Costello	Chief of Staff and Principal Architect, Office of the National Cyber Director
<i>WestExec Advisors</i>	Lieutenant General Telita Crosland, USA (Ret.)	Director, Defense Health Agency
<i>WestExec Advisors</i>	J.D. Crouch	Dep. National Security Advisor; Asst. Sec. of Defense for International Security Policy

⁸ Our Team, WestExec Advisors, <https://westexec.com/our-team/> (last visited Oct. 13, 2026).

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i>	Wendy Cutler	Acting Dep. U.S. Trade Representative
<i>WestExec Advisors</i>	Ivo Daalder	U.S. Ambassador to NATO; Dir. for European Affairs, NSC
<i>WestExec Advisors</i>	Melissa Dalton	Under Sec., U.S. Air Force
<i>WestExec Advisors</i>	Stacey Dixon	Dep. Dir. of National Intelligence
<i>WestExec Advisors</i>	Preston Dunlap	Chief Technology Officer and Chief Architect Officer, U.S. Air Force and Space Force
<i>WestExec Advisors</i>	Elizabeth Economy	Senior Advisor for China to the Sec., Dept. of Commerce
<i>WestExec Advisors</i>	Wendy Edelberg	Chief Economist, Congressional Budget Office
<i>WestExec Advisors</i>	Jonathan Elkind	Asst. Sec. for International Affairs, Dept. of Energy
<i>WestExec Advisors</i>	Paul Farley	Asst. Dir. for South and Central Asia, CIA
<i>WestExec Advisors</i>	Michèle Flournoy	Under Sec. of Defense for Policy
<i>WestExec Advisors</i>	Brett Freedman	Chief of Staff, Dept. of Justice National Security Division
<i>WestExec Advisors</i>	Lieutenant General Sean Gainey, USA (Ret.)	Commander of the U.S. Army Space and Missile Defense Command
<i>WestExec Advisors</i>	Laura Galante	Dir. of the Cyber Threat Intelligence Integration Center and Intelligence Community Executive, Office of the Dir. of National Intelligence
<i>WestExec Advisors</i>	Kevin Gallagher	Senior Advisor to the Sec., Dept. of Commerce
<i>WestExec Advisors</i>	Michelle Gavin	U.S. Ambassador to the Republic of Botswana; U.S. Representative to the Southern Africa Development Community
<i>WestExec Advisors</i>	General David Goldfein, USAF (Ret.)	Chief of Staff, U.S. Air Force
<i>WestExec Advisors</i>	Adam M. Golodner*	Chief of Staff, U.S. Dept. of Justice Antitrust Division
<i>WestExec Advisors</i>	Heidi Grant	Director, Defense Security Cooperation Agency
<i>WestExec Advisors</i>	Eric Green	Senior Dir. for Russia and Central Asia, NSC

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i>	Lawrence J. Gumbiner	Dep. Asst. Sec., U.S. Dept. of State
<i>WestExec Advisors</i>	Henry Haggard	Minister Counselor for Political Affairs, U.S. Embassy Seoul; Dir. for UK and the Eastern Mediterranean, NSC
<i>WestExec Advisors</i>	Janice Haith	Chief Information Officer, U.S. Navy
<i>WestExec Advisors</i>	Emily Harding	Dep. Staff Director, U.S. Senate Select Committee on Intelligence
<i>WestExec Advisors</i>	General Timothy Haugh, USAF (Ret.)	Director, NSA; Commander, U.S. Cyber Command
<i>WestExec Advisors</i>	General James Hecker, USAF (Ret.)	Commander of the U.S. Air Forces in Europe, U.S. Air Forces in Africa, and Allied Air Command, U.S. Air Force
<i>WestExec Advisors</i>	Kevin Higgins	Chief of Staff to the Director, Central Intelligence Agency
<i>WestExec Advisors</i>	Emily Horne	Special Asst. to the President; Spokesperson, NSC
<i>WestExec Advisors</i>	Michael Horowitz	Dep. Asst. Sec. of Defense for Force Development and Emerging Capabilities
<i>WestExec Advisors</i>	Jason Israel	Senior Dir. for Defense Policy, NSC
<i>WestExec Advisors</i>	Ambassador Jim Jeffrey	Dep. National Security Advisor; Special Envoy to the Coalition to Defeat ISIS
<i>WestExec Advisors</i>	Johnnie Kaberle	Staff Director, U.S. House of Representatives Defense Appropriations Subcommittee
<i>WestExec Advisors</i>	Janet Kavandi	Dir. of the Glenn Research Center, NASA
<i>WestExec Advisors</i>	Mark Kelly, USAF (Ret.)	Commander of Air Combat Command, U.S. Air Force
<i>WestExec Advisors</i>	Andrea Kendall-Taylor	Dep. National Intelligence Officer for Russia and Eurasia, National Intelligence Council; Senior Analyst, Central Intelligence Agency
<i>WestExec Advisors</i>	Cristina Killingsworth	Acting Asst. Sec. of Commerce for Economic Development
<i>WestExec Advisors</i>	Sean Kirkpatrick	Dep. Dir. of Intelligence and DNI Representative to U.S. Space Command
<i>WestExec Advisors</i>	Ambassador Marc Knapper	U.S. Ambassador to Vietnam
<i>WestExec Advisors</i>	Harry Krejsa	Asst. Dir. for Strategy, WH Office of the National Cyber Director
<i>WestExec Advisors</i>	Bill LaPlante	Under Sec. of Defense for Acquisition and Sustainment

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i>	Linda Lourie*	Asst. Dir. for Research and Technology Security, WH Office of Science and Technology
<i>WestExec Advisors</i>	General Stephen R. Lyons, USA (Ret.)	Presidential Special Envoy for Ports and Supply Chains; Commander, U.S. Transportation Command
<i>WestExec Advisors</i>	Susannah Marshall	Senior Policy Advisor, Dept. of Commerce Office of Policy and Strategic Planning
<i>WestExec Advisors</i>	General Kenneth F. McKenzie, USMC (Ret.)	Commander, U.S. Central Command
<i>WestExec Advisors</i>	Captain Newt McKissick, USN (Ret.)	Military Dep. to the Director, Defense Innovation Unit
<i>WestExec Advisors</i>	Admiral Bill Moran, USN (Ret.)	Vice Chief of Naval Operations; Chief of Naval Personnel
<i>WestExec Advisors</i>	Morgan Muir	Dep. Dir. of National Intelligence; Associate Dir. of the Central Intelligence Agency
<i>WestExec Advisors</i>	Blas Nunez-Neto	Acting Asst. Sec. for International Affairs; Asst. Sec. for Border and Immigration Policy, Dept. of Homeland Security
<i>WestExec Advisors</i>	Daniel Poneman*	Dep. Sec. of Energy; Special Asst. to the President for Nonproliferation and Export Controls
<i>WestExec Advisors</i>	Brandon Possin	U.S. Diplomat in Japan
<i>WestExec Advisors</i>	Alexis Prieur L'Heureux	Chief of Staff, Office of U.S. Congressman Seth Moulton
<i>WestExec Advisors</i>	Deborah Rosenblum*	Asst. Sec. of Defense for Nuclear, Chemical, and Biological Defense Programs; Acting Dep. Undersecretary of Defense for Acquisition and Sustainment
<i>WestExec Advisors</i>	Ambassador Dennis Ross	Special Asst. to the President; Senior Dir. for the Central Region, NSC
<i>WestExec Advisors</i>	Danny Russel	Asst. Sec. of State for East Asian and Pacific Affairs; Senior Dir. for Asian Affairs, NSC
<i>WestExec Advisors</i>	Rear Admiral Lorin Selby, USN (Ret.)	Chief of Naval Research; Chief Engineer, U.S. Navy
<i>WestExec Advisors</i>	Arun A. Seraphin	Professional Staff Member, U.S. Senate Committee on Armed Services
<i>WestExec Advisors</i>	Vice Admiral Bob Sharp, USN (Ret.)	Director, National Geospatial-Intelligence Agency

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i>	Ambassador Dana Shell Smith	U.S. Ambassador to the State of Qatar; Principal Dep. Asst. Sec. of State for Public Affairs
<i>WestExec Advisors</i>	Theodore Singer	Head of Middle East Operations, Central Intelligence Agency
<i>WestExec Advisors</i>	Vikram Singh	Dep. Asst. Sec. of Defense for South and Southeast Asia
<i>WestExec Advisors</i>	Michael Singh	Senior Dir. for Near East and North African Affairs, NSC
<i>WestExec Advisors</i>	Sabrina Singh	Dep. Press Sec., Dept. of Defense; Special Asst. to the President and Dep. Press Sec. to the Vice President
<i>WestExec Advisors</i>	Christopher Smart	Special Asst. to the President for Economics, Trade and Investment; Dep. Asst. Sec. for Europe and Eurasia, U.S. Treasury
<i>WestExec Advisors</i>	Hanscom Smith	U.S. Consul General in Hong Kong
<i>WestExec Advisors</i>	Richard Stengel	Under Sec. of State for Public Diplomacy and Public Affairs, U.S. Dept. of State
<i>WestExec Advisors</i>	Jen Stewart	Chief of Staff to the Sec. of Defense
<i>WestExec Advisors</i>	Rear Admiral Mike Studeman USN (Ret.)	Commander, Office of Naval Intelligence
<i>WestExec Advisors</i>	Mohsin Syed	Chief of Staff, U.S. Dept. of Transportation
<i>WestExec Advisors</i>	Stephen Tankel	Dir. for Defense Policy and Strategy, NSC
<i>WestExec Advisors</i>	The Honorable Mac Thornberry	Member, U.S. House of Representatives; Chairman, U.S. House of Representatives Armed Services Committee
<i>WestExec Advisors</i>	Katie Tobin	Dep. Asst. to the President and Senior Dir. for Transborder, WH NSC
<i>WestExec Advisors</i>	Jim Townsend	Dep. Asst. Sec. of Defense for European and NATO Policy, U.S. Dept. of Defense
<i>WestExec Advisors</i>	Will Turner	Acting Asst. Sec. for Legislative and Intergovernmental Affairs, U.S. Dept. of Commerce
<i>WestExec Advisors</i>	General Glen VanHerck, USAF (Ret.)	Commander of U.S. Northern Command (NORTHCOM) and North American Aerospace Defense Command (NORAD), U.S. Air Force
<i>WestExec Advisors</i>	Celeste Wallander	Asst. Sec. of Defense for International Security Affairs; Senior Dir. for Russia/Eurasia, WH NSC
<i>WestExec Advisors</i>	Matthew Waxman	Principal Dep. Dir. and Acting Dir. of the Sec. of State's Policy Planning Staff; Dep. Asst. Sec. of Defense
<i>WestExec Advisors</i>	Robert O. Work	Dep. Sec. of Defense; Under Sec. of the Navy

Firm	Name	Executive or Legislative Branch Position(s)
<i>WestExec Advisors</i>	Nick Zimmerman	Dir. for Brazil and Southern Cone Affairs, NSC, and Former Senior Policy Advisor to the U.S. Ambassador to the UN

* These individuals have previously been registered under the LDA but are no longer registered and were never registered while employed at their current strategic advisory firm.

Appendix D: Unregistered Government Affairs Executives

CLC reviewed the four tech companies that spent the most on lobbying in 2025 (Meta, Alphabet Inc., Oracle Corp., and Microsoft Corp.) based on an OpenSecrets analysis of all lobbying activity in 2025.¹

Company	Amount Spent on Lobbying in 2025 ²	Unregistered Gov. Affairs Executive	Title
<i>Alphabet Inc.</i>	\$16.54M	Karan Bhatia ³	Vice President, Government Affairs & Public Policy ⁴
<i>Oracle Corp.</i>	\$11.55M	Allison O'Brien ⁵	Managing Director, Government Affairs ⁶
<i>Microsoft Corp.</i>	\$10.11M	Mike McMahon ⁷	Senior Director US Government Affairs ⁸

¹ See Emma Sullivan and Hien An Ngo, Lobbying Firms Took in a Record \$5 Billion in 2025, OpenSecrets (Jan. 29, 2026), <https://www.opensecrets.org/news/2026/01/lobbying-firms-took-in-a-record-5-billion-in-2025/>.

² *Id.*

³ Search Results for Lobbyist “bhatia, karan”, U.S. Congress, Lobbying Disclosure Act Database, <https://perma.cc/8CG2-T3L8> (last visited Oct. 7, 2026) (showing the most recent LDA report on which Bhatia appeared was filed on October 25, 2018, and that he has never appeared on a report for Alphabet).

⁴ Featured Authors: Karan Bhatia, News from Google, <https://blog.google/authors/karan-bhatia/> (last visited Oct. 8, 2026).

⁵ Search Results for Lobbyist “o'brien, allison”, U.S. Congress, Lobbying Disclosure Act Database, <https://perma.cc/B4DN-YTJH> (last visited Oct. 7, 2026) (showing no LDA registrations).

⁶ Allison O'Brien, LinkedIn Profile, <https://perma.cc/7TKZ-VUYH> (last visited Oct. 7, 2026).

⁷ Search Results for Lobbyist “mcmahon, mi”, U.S. Congress, Lobbying Disclosure Act Database, <https://perma.cc/N9KF-4Q78> (last visited Oct. 7, 2026) (only showing LDA registrations for a different individual named Michael McMahon).

⁸ Mike McMahon, LinkedIn Profile, <https://perma.cc/7CB4-6D39> (last visited Oct. 8, 2026).