

## LOBBYING REGISTRATION AND REAL PARTY IN INTEREST

A question that often comes up during the registration process is what is a Real Party in Interest? The purpose of the Real Party in Interest is to allow Ohio residents to know on whose behalf an individual is actually advocating. In what situations should the Real Party in Interest be applicable to lobbying registrations? Among the more frequent scenarios are:

- When the lobbyist will be representing the interests of a corporate subsidiary.

In this situation most of the advocacy will occur on behalf of the subsidiary. However, there may be times when the interests of the parent corporation will be advocated for as well. The lobbyist should register the engagement with the subsidiary listed as the employer and the parent corporation as the real party in interest, (i.e. the employer the lobbyist is holding themselves out as lobbying on behalf of). A separate registration on behalf of the parent corporation is also an option.

- When several entities aggregate their resources to form a coalition.

In this situation the employer will have a lobbyist who advocates legislation that is of interest to the employer individually. However, the employer may also wish to align themselves with other entities that are looking for a similar outcome in a campaign or coalition. The entities aggregate their resources to maximize influence. In situations where the lobbyist will hold themselves out as representing the campaign or coalition then a registration statement should be filed showing the coalition or campaign as the employer and the actual employer as the real party in interest.

Example – Lobbyist A is registered on behalf of ACME Corporation. ACME, ABC Company and two non-profits are all looking for the same outcome on legislation and wish to combine their efforts for maximum effect by forming “PMR Coalition”. If the lobbyist who is registered on behalf of ACME intends to hold themselves out only as representing “PMR Coalition” a registration statement showing “PMR Coalition” as the employer and ACME Corporation as the real party in interest should be filed in OLAC. If the agent will hold him or herself out as representing “ACME -a member of PMR Coalition”; there is no need for the real party in interest.