FINAL PUBLICATION EDITION

THE U.S. LOBBYING INDUSTRY

Power, Policy, Networks, and the Professional Influence System in Washington

A graduate-level research monograph on how interests, institutions, information, money, law, networks, media, and public opinion interact in American policymaking.

CONGRESS | EXECUTIVE BRANCH | REGULATION | LAW | MONEY
INFORMATION | NETWORKS | MEDIA | PUBLIC OPINION

The American Newspaper https://americannewspaper.org

AmericanTV https://americantv.org

Research cutoff: September 17, 2026

Primary-source preference | Current evidence separated from historical evidence

Fact / academic finding / media report / analytical inference distinguished where material

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This publication edition uses verified final pagination, linked contents, a linked list of figures, consolidated Arabic source notes, accessibility-aware structure, and print-quality controls.

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Evidence and citation discipline

- Material factual claims are documented through source notes and the bibliography, with primary sources preferred where available.
- Peer-reviewed findings are distinguished in prose from media or industry reporting; analytical inference is explicitly identified where causation is uncertain.
- Current evidence is dated to the September 17, 2026 research cutoff; historical evidence is not presented as current evidence.
- Lobbying expenditures, access, and policy outcomes are treated as distinct variables. Expenditure is never treated as proof of causal influence.

EXECUTIVE SUMMARY

The American lobbying industry is best understood not as a collection of people asking politicians for favors, but as a professional market for representation, information, access, institutional navigation, legislative labor, regulatory expertise, coalition building, political intelligence, and strategic communication.

Core operating model

Economic and social interests -> Government Affairs / Lobbying / Law / Public Affairs infrastructure -> Congress + Executive Branch + Agencies -> Legislation + Regulation + Spending + Procurement + Enforcement. Campaign finance, media, think tanks, trade associations, grassroots organizations, litigation, and public opinion surround this formal core.

Lobbying is constitutionally connected to rights of speech, association, and petition, while Congress may impose disclosure and ethics rules. The Supreme Court upheld important federal lobbying disclosure requirements in United States v. Harriss. Lawful advocacy, information provision, meetings, and attempts to persuade are therefore fundamentally different from bribery or an unlawful quid pro quo.

Bloomberg Government estimated approximately $5.3 billion in federal lobbying spending in 2025, up from more than $4.5 billion in 2024. An SEC filing using OpenSecrets data reported more than 13,000 lobbyists and calculated that the top 25 firms represented only 18.3% of the federal market in 2025, indicating a large but fragmented professional-services industry.

The 2026 market remained strong through the research cutoff. Reuters reported Q2 2026 federal lobbying revenue of approximately $33.2 million at Ballard Partners, $21.8 million at BGR Group, $21.63 million at Brownstein Hyatt Farber Schreck, and $18.26 million at Akin, amid intensive activity involving trade, defense, energy, taxation, regulation, and executive action.

Hall and Deardorff describe lobbying as a form of legislative subsidy: lobbyists provide policy information, political intelligence, and legislative labor to policymakers. Bertrand, Bombardini, and Trebbi find evidence for both subject-matter expertise and relationship capital. Blanes i Vidal, Draca, and Fons-Rosen estimate that lobbyists formerly linked to a senator experienced an average 24% decline in generated revenue when that senator left office, illustrating the economic value of political relationships.

Money does not mechanically purchase policy outcomes. Baumgartner and coauthors found that roughly 60% of the 98 lobbying campaigns they studied produced no policy change, and organizational resources explained relatively little variation in success. Much lobbying is defensive: preserving the status quo, modifying implementation, obtaining technical exceptions, delaying adverse decisions, or ensuring that policymakers understand a client position.

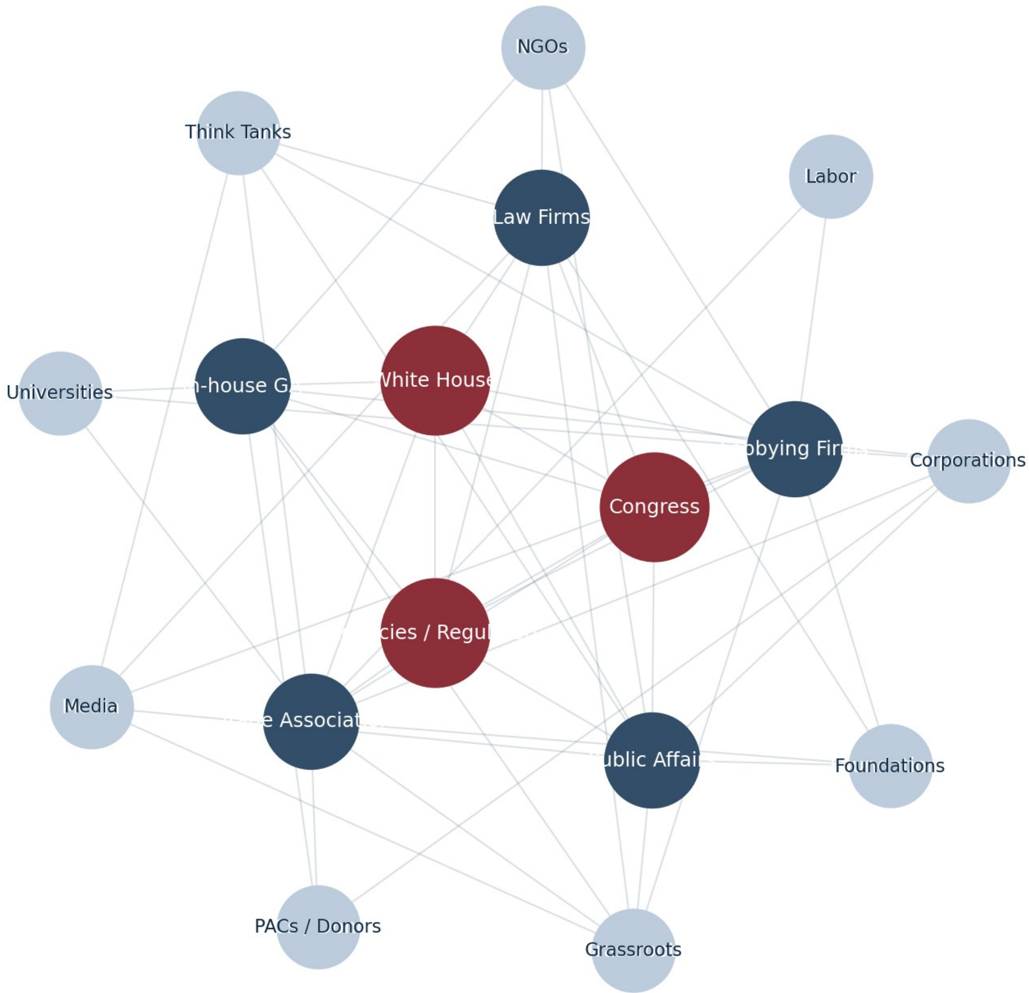
Central analytical conclusion

Washington is simultaneously a government, a political system, an information market, a professional-services market, and a relationship network. Lobbying firms are intermediaries connecting those systems.

KEY FINDINGS

1. Registered lobbying is narrower than the broader influence industry. LDA thresholds, definitions, and the 20% test leave significant advocacy, communications, grassroots, consulting, legal, and political-intelligence activity outside formal lobbying totals.
2. Washington power is institutionally dispersed. Congress, committees, staff, the White House, OMB/OIRA, cabinet departments, independent agencies, and career regulators control different stages and veto points.
3. Lobbying increasingly functions as an integrated professional service overlapping regulatory law, strategic communications, coalition management, grassroots activation, and political intelligence.
4. The federal market is fragmented; in the OpenSecrets-derived 2025 data, the 25 largest firms represented only 18.3% of total federal lobbying spending.
5. Healthcare is especially important economically. Pharmaceuticals and health products alone accounted for about $451.8 million in reported 2025 federal lobbying spending in the cited dataset.
6. Relationships have measurable economic value, but expertise, process knowledge, credibility, and institutional positioning also matter.
7. Former congressional or agency staff may possess operational value that exceeds the symbolic value of a former elected official because staff often own the technical details of process and policy.
8. Lobbying often seeks to prevent change rather than create it, making effectiveness difficult to observe.
9. Executive and regulatory lobbying has become increasingly important because major economic decisions are made through rulemaking, procurement, implementation guidance, trade policy, sanctions, and executive action.
10. The scarce resource is not raw information alone. Trusted interpretation and the ability to deliver the right information to the right institutional actor at the right procedural moment are scarcer.

The Washington Influence Ecosystem: Institutions, Intermediaries, and Constituencies



Conceptual network: links indicate common channels of interaction, not measured causal influence.

Figure 1. Washington influence ecosystem: institutions, intermediaries, and constituencies. Conceptual links indicate recurring channels of interaction, not measured causal influence.

PART I. WHAT IS LOBBYING?

1. Political-science, legal, and practical definitions

Political-science definition: lobbying is an organized attempt by private or public interests to influence governmental decisions without themselves exercising formal governmental authority. The object can be legislation, regulation, taxation, appropriations, procurement, implementation, enforcement, appointments, or trade policy.

Legal definition: federal law uses narrower statutory tests. Under current LDA guidance, an individual generally becomes a statutory lobbyist when compensated, making more than one lobbying contact, and spending at least 20% of that individual's time for the client during the relevant three-month period on lobbying activities. Lobbying activities include supporting research, preparation, planning, and coordination.

Effective January 1, 2025, the key monetary thresholds cited in current guidance are more than $3,500 in quarterly lobbying income for an outside firm representing a particular client and more than $16,000 in quarterly lobbying expenses for an organization employing in-house lobbyists, assuming the other statutory tests are satisfied.

Practical Washington definition: managing an organization's relationship with governmental decision-making institutions in order to protect or advance its interests.

2. Terminology matrix

Term	Primary function	Typical target
Lobbying	Direct policy influence	Congress, agencies, executive branch
Advocacy	Broad support for a cause or position	Government and public
Government Relations	Managing ongoing governmental relationships	Government
Government Affairs	Broad organizational policy and advocacy function	Government and stakeholders
Public Affairs	Policy plus communication and stakeholder strategy	Government, public, media
Public Policy	Substantive policy analysis and formulation	Internal and government
Political Consulting	Electoral and political strategy	Campaigns and political organizations
Strategic Communications	Message architecture and communications	Public, media, stakeholders
Grassroots Advocacy	Mobilizing ordinary constituents	Elected officials
Grasstops Advocacy	Mobilizing influential local actors	Elected officials
Regulatory Affairs	Managing regulatory processes	Agencies
Legislative Affairs	Managing legislative processes	Congress and legislatures
Public Relations	Reputation and media management	Public and media
Campaign Consulting	Election strategy	Candidates and campaigns
Issue Advocacy	Advocacy concerning public issues	Public and policymakers

3. Why lobbying is legal

The First Amendment protects speech, association, and the right to petition government. Lobbying is one organized form of petitioning. Constitutional protection does not create immunity from disclosure, ethics, conflict-of-interest, bribery, or campaign-finance rules.[1,2]

Lobbying vs. bribery

Lawful model: client -> lobbyist -> argument/information/request -> public official independently decides. Potential bribery model: thing of value <-> agreement concerning an official act. Access is not agreement; a meeting is not corruption; a campaign contribution is not a lobbying fee; and lobbying is not bribery.

PART II. HISTORICAL DEVELOPMENT OF THE U.S. LOBBYING INDUSTRY

Lobbying predates the modern term and the modern industry. Petitioning, claims representation, tariff advocacy, land interests, and organized commercial pressure existed from the early republic. What changed over time was the scale, permanence, technical sophistication, and professional organization of representation in Washington.

Periodization

Period	Principal development
Early Republic	Petitions, tariffs, land claims, commercial interests, constituent delegations; ad hoc representation rather than a mature industry.
19th century	Railroads, banking, pensions, procurement, tariffs, and land grants expand the use of claim agents and paid representatives.
Gilded Age	Railroads, trusts, industrial corporations, and financial interests increase organized representation; corruption scandals shape public perceptions.
Progressive Era	Antitrust, labor, utility, consumer, and regulatory reform widen both corporate and public-interest advocacy.
New Deal	Expansion of federal administrative power makes permanent Washington representation far more valuable.
Post-World War II	Defense, taxation, procurement, regulated industries, trade associations, and corporate Washington offices expand.
1960s-1970s	Civil-rights, environmental, consumer, labor, and public-interest groups expand; corporations build countervailing permanent Washington operations.
1980s Reagan era	Tax, defense, deregulation, and regulatory policy create large demand for professional government-relations expertise.
1990s	Industry institutionalization; Lobbying Disclosure Act of 1995 establishes modern disclosure architecture.
2000s	Larger integrated firms; HLOGA 2007 strengthens disclosure, contribution reporting, ethics, and revolving-door rules.
Obama administration	ACA, Dodd-Frank, energy, technology, and large rulemaking programs increase congressional and agency lobbying.
First Trump administration	Tax, trade, tariffs, deregulation, and executive-branch policy increase demand for White House and agency expertise.
Biden administration	Infrastructure, CHIPS, IRA, healthcare, competition policy, climate, and industrial-policy implementation intensify lobbying across branches.
Second Trump administration through Sept. 2026	Trade, defense, energy, taxation, AI, procurement, and executive/regulatory policy contribute to exceptionally strong demand for federal influence services.

The Federal Regulation of Lobbying Act was enacted in 1946. The modern LDA replaced that architecture in 1995; the Honest Leadership and Open Government Act significantly amended the system in 2007. The major industrial acceleration in professional lobbying occurred after the 1960s-1970s as regulatory scope expanded and corporations, associations, advocacy organizations, and professional firms built permanent Washington capacity.[3]

Expanded historical analysis: from petitioning to an influence profession

The most important historical transformation was not the invention of influence seeking - petitions, claims, tariff requests, land matters, and private bills are as old as the federal government - but the creation of a permanent professional market around an expanding administrative state. Early influence work was episodic and often attached to particular claims. By the nineteenth century, railroads, tariffs, pensions, land grants, banking, and procurement had created recurring demand for agents who understood Congress. The Gilded Age added corporate scale and national transportation and finance networks. Progressive-era regulation then created a second logic: interests increasingly had to influence not only legislation but administrative rules and enforcement.

The New Deal widened the federal policy surface dramatically. When the federal government regulates securities markets, labor relations, banking, communications, agriculture, and industrial recovery, organized interests acquire incentives to maintain permanent Washington offices. After World War II, defense procurement, taxation, trade, and the modern trade-association infrastructure reinforced this permanence. The 1960s and 1970s added environmental, consumer, civil-rights, public-interest, and social-movement organizations; corporate political organization expanded in response. The result was not simply more corporate lobbying, but a denser pluralist competition among business, labor, professions, cause groups, state and local governments, universities, and public-interest organizations.

The legal architecture evolved as the profession grew. Congress adopted the Federal Regulation of Lobbying Act in 1946. The Senate historical account describes a registration regime focused on money used principally to influence passage or defeat of legislation. The Lobbying Disclosure Act of 1995 replaced that older framework, explicitly finding that representative government requires public awareness of paid efforts to influence federal decisions. The 2007 Honest Leadership and Open Government Act strengthened reporting, contribution disclosure, ethics provisions, and revolving-door rules.

Era	Dominant policy terrain	Organizational change in influence work
Early Republic-1820s	Petitions, land, trade, claims, private bills	Episodic petitioning, claim agents, local delegations
Industrial 19th century	Tariffs, railroads, banking, land grants, pensions	More professional Washington representation
Gilded Age	National corporations, trusts, transportation	Corporate government representation expands
Progressive Era	Antitrust, utilities, food/drug, labor	Regulatory expertise becomes more valuable
New Deal	Banking, securities, labor, agriculture, administrative law	Permanent Washington offices and association capacity
Postwar-1950s	Defense, tax, trade, infrastructure	Procurement and appropriations lobbying deepens
1960s-1970s	Civil rights, environment, consumer, health, workplace	Public-interest mobilization plus corporate counter-mobilization
1980s	Tax, defense, deregulation	Professional firms and partisan/policy networks grow
1990s	Budget, telecom, trade, financial modernization	Modern disclosure regime; public-affairs integration
2000s	Security, finance, health, technology	Larger multidisciplinary platforms; HLOGA reforms
2010s	ACA, Dodd-Frank, climate, tech, trade	Implementation and rulemaking become central
2020s to cutoff	Industrial policy, AI, semiconductors, energy, trade, national security	Integrated GR, regulatory, communications, data, and political-intelligence models

PART III. WASHINGTON'S REAL POWER ECOSYSTEM

The most useful unit of analysis is not the individual lobbyist. It is the influence network connecting institutions, professional intermediaries, organized interests, information producers, political finance, communications, and public constituencies.

Network map

Voters / public opinion / media / advocacy NGOs / business groups / trade associations / donors / PACs / think tanks / universities -> lobbying firms, law firms, public-affairs firms, political intelligence and in-house Government Affairs -> House, Senate, White House, OMB, cabinet departments and independent agencies -> legislation, regulation, spending, procurement, enforcement and implementation.

The same issue may involve multiple channels at once. A technology company facing an antitrust concern may simultaneously need legal counsel, direct agency advocacy, congressional education, coalition management, investor communications, and public-facing strategic communications. The Washington influence industry is therefore an ecosystem rather than a single occupational category.

PART IV. INDUSTRIAL STRUCTURE OF THE U.S. LOBBYING MARKET

Market size and growth

Bloomberg Government estimated federal lobbying spending at approximately $4.27 billion in 2023, more than $4.5 billion in 2024, and approximately $5.3 billion in 2025. Its 2026 market report analyzed hundreds of firms with at least $1.3 million in annual federal lobbying revenue.

An SEC filing using OpenSecrets data calculated an approximately 4.1% compound annual growth rate from 2014 through 2025, reported more than 13,000 federal lobbyists, and estimated that the top 25 firms accounted for only 18.3% of federal lobbying spending in 2025.

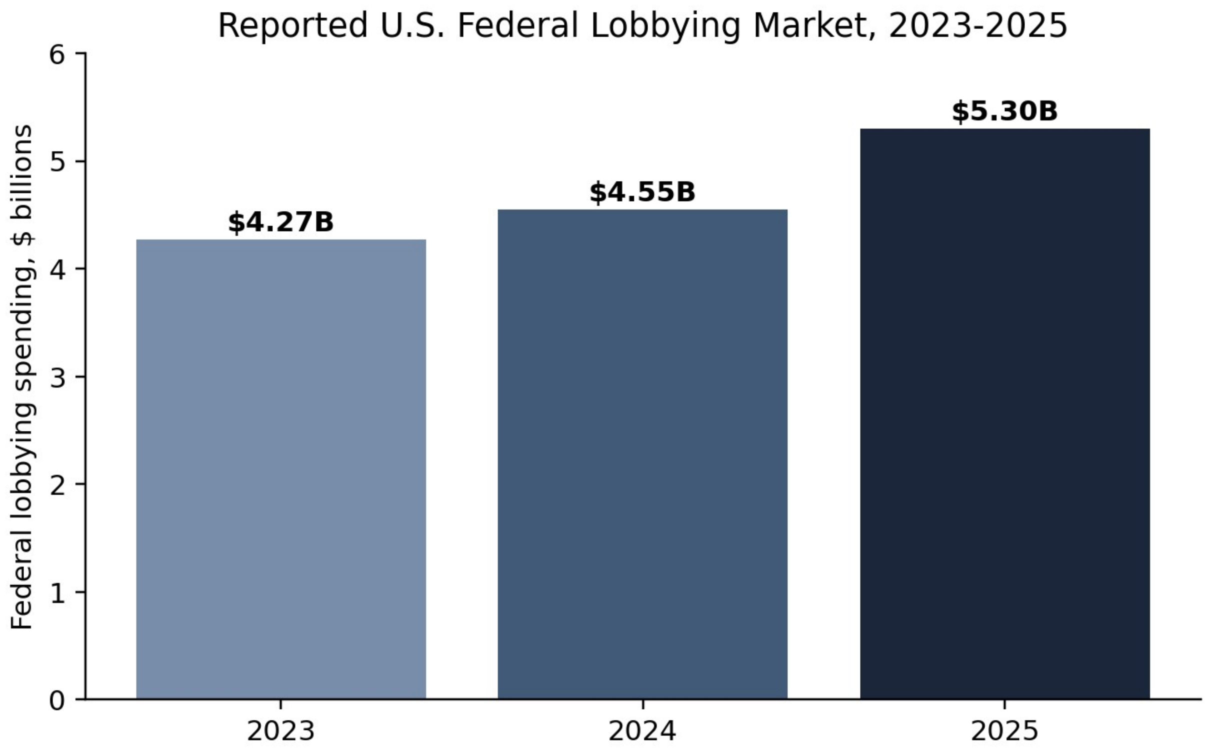
Aggregate totals can differ across data vendors because classification, amendments, duplicate handling, and the distinction between income and organizational expenses can differ. A serious longitudinal study should use one consistent methodology rather than splice incompatible series.

Selected 2025 industry categories (latest complete-year comparison at research cutoff)[4,5]

Current-data note: figures, personnel, addresses, and active filings are stated as of the September 17, 2026 research cutoff unless otherwise indicated.

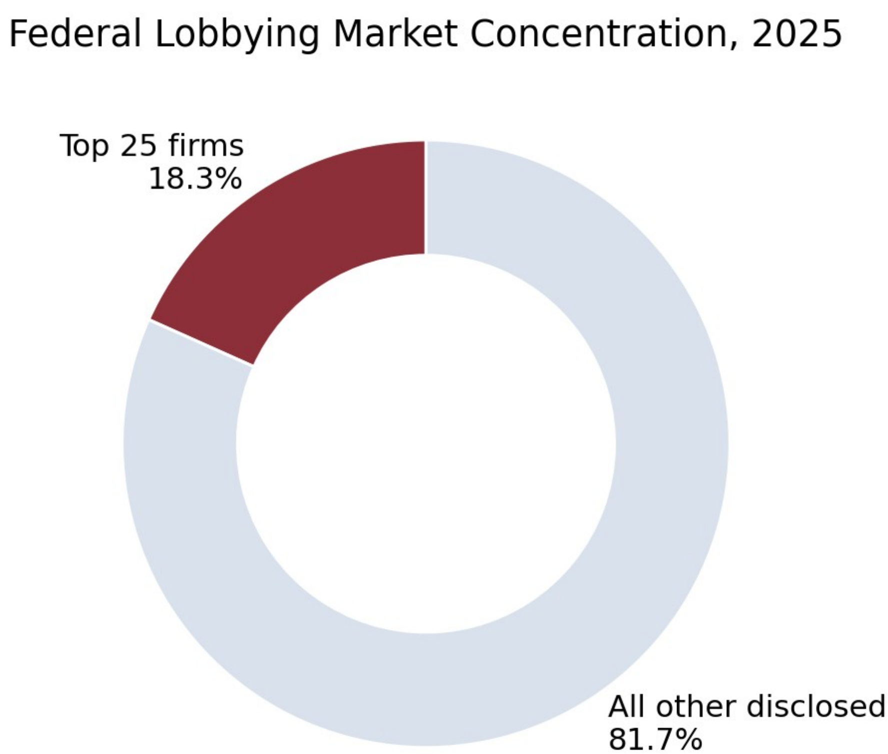
Industry / category	Reported 2025 federal lobbying spending
Pharmaceuticals / Health Products	$451.8M
Electronics Manufacturing & Equipment	$315.3M
Securities & Investment	$194.7M
Insurance	$172.2M
Air Transport	$155.1M
Hospitals / Nursing Homes	$152.9M
Oil & Gas	$148.3M
Business Associations	$145.0M
Electric Utilities	$142.4M
Health Services / HMOs	$142.0M
Real Estate	$126.9M
Education	$124.3M
Internet	$114.6M
Telecom Services	$113.9M
Automotive	$109.5M
Health Professionals	$100.9M
Misc. Defense	$100.6M

Expanded market evidence and data-method caution



Sources: Bloomberg Government (2023-2025 estimates). 2024 shown as approximate >$4.5B.

Figure 2. Reported federal lobbying market, 2023-2025. 2024 is shown as an approximate value because cited public summaries state more than $4.5 billion.



Source: OpenSecrets-derived PPHC SEC filing.

Figure 3. The top 25 firms accounted for 18.3% of the 2025 federal market in the OpenSecrets-derived dataset, illustrating fragmentation.

Two numbers can both be credible and still differ. Bloomberg Government, OpenSecrets, Senate/House LDA data, and issuer analyses may use different treatments of registrants, amendments, in-house expense estimates, tax-reporting alternatives, subsidiaries, and duplicate records. For longitudinal work, a researcher should select one methodology and apply it consistently rather than splice series together. This edition therefore labels the source attached to every aggregate market number.

The market also has at least three economically distinct layers. First is in-house federal lobbying expense, where an organization employs its own registered personnel. Second is external lobbying revenue paid to firms. Third is the broader influence market - strategic communications, grassroots, law, state advocacy, research, coalition management, political intelligence, and other work that may not appear in federal LDA totals. The third layer is economically important but cannot be measured simply by adding every adjacent professional-services market because of overlap and double counting.[6,7]

PART V. THE BUSINESS MODEL OF LOBBYING FIRMS

In-house vs. outside lobbying

Dimension	In-house Government Affairs	Outside firm
Institutional knowledge	Very high	Must learn client and context
Political network breadth	Depends on internal team	Often broad across clients and institutions
Sector specialization	Deep in one company or industry	Can combine multiple sector specialists
Availability	Dedicated to employer	Shared across client portfolio
Cost structure	Fixed salaries and overhead	Retainer or project fees
Confidentiality	Easier internal control	Requires external information sharing
Administration changes	May become politically mismatched	Can supplement with new networks
Surge capacity	Limited by headcount	Potentially high
Coalition intelligence	Moderate	Often extensive
Senior access	Depends on internal personnel	Can be a major differentiator

The sophisticated model is usually hybrid: internal Government Affairs owns corporate strategy, institutional memory, priorities, and long-term relationships; outside firms add network breadth, procedural specialization, administration- or committee-specific expertise, crisis capacity, and temporary staffing leverage.

How firms earn revenue

- Monthly or annual retainers
- Project fees
- Legislative strategy
- Regulatory consulting and rulemaking strategy
- Political intelligence
- Coalition management
- Appropriations and procurement strategy
- Crisis-response engagements
- Strategic communications and grassroots management
- Monitoring, research, and executive advisory services

The cost base is primarily human capital: senior lobbyist compensation, analyst and associate salaries, recruitment, research and data systems, compliance, business development, office costs, travel, and relationship maintenance. Economically, a lobbying firm resembles a partnership-oriented professional-services firm in which senior client relationships and origination can be highly portable.

PPHC reported average annual client renewal of roughly 77% and revenue retention of approximately 86% between 2020 and 2025 across its broader public-affairs platform. This illustrates the attractiveness of recurring retainer economics, while not necessarily representing every lobbying firm.

Comparison with adjacent professional services

Sector	Principal product	Common pricing	Core asset
Lobbying	Policy representation	Retainer/project	Networks + expertise + process knowledge
Big Law	Legal judgment	Hourly/matter	Legal expertise and professional responsibility
Management Consulting	Analysis and organizational change	Project/retainer	Analytical and implementation capacity
Public Relations	Reputation and communication	Retainer/project	Media and public narrative capability

Expanded professional-services economics

Lobbying-firm economics are dominated by human capital and client origination rather than physical capital. A public-company example is useful because most privately held firms do not disclose financial statements. Public Policy Holding Company reported more than 90% of client revenue as retainer-based in 2025, approximately 1,400 active client relationships, a top-ten-client revenue concentration of only about 9%, and adjusted EBITDA margins in the mid-20% range. These figures describe one diversified platform, not the entire market, but they illustrate the recurring-revenue and low-capital-intensity logic of the business. [VF/Industry filing]

At the partner level, the economically decisive distinction is often between service revenue and originated revenue. A partner who maintains relationships with chief government-affairs officers, general counsels, trade-association CEOs, investors, and corporate executives can convert policy shocks into new engagements. The firm then monetizes that relationship through a team that supplies monitoring, drafting, meetings, coalition work, research, and communications. This is structurally similar to Big Law and investment banking: senior rainmakers originate; specialists and teams execute; reputation and cross-selling reduce client-acquisition costs.[8]

Economic feature	Lobbying firm	Law firm	Management consulting	Public relations
Recurring revenue	Monthly/annual retainers common	Outside-counsel relationships + matters	Retainers less dominant; projects common	Retainers common
Senior origination	Very high importance	Very high	High	High
Junior leverage	Moderate	High	High	Moderate/high
Physical capital needs	Low	Low	Low	Low
Primary scarce asset	Relationships + policy/process expertise	Legal expertise + client trust	Analytical talent + transformation capacity	Reputation/media/stakeholder capability
Outcome attribution	Often difficult	Matter-specific and often clearer	Variable	Variable

PART VI. MAJOR U.S. LOBBYING AND GOVERNMENT-RELATIONS FIRMS

The table below is not an influence ranking. It is ordered by publicly reported 2025 federal lobbying income in the cited OpenSecrets-derived dataset. Total firm accounting revenue can be materially larger where the organization also provides legal, communications, state lobbying, or consulting services.

Firm	2025 federal lobbying income	Type
Ballard Partners	$88.1M	Independent government relations
Brownstein Hyatt Farber Schreck	$73.8M	Law + government relations
BGR Group	$71.5M	Government relations / public affairs
Akin	$65.4M	Law + public policy
Cornerstone Government Affairs	$55.7M	Independent government relations / public affairs
Holland & Knight	$54.9M	Law + public policy
Miller Strategies	$51.1M	Independent government relations
Invariant	$47.2M	Government relations + communications
Thorn Run Partners	$32.3M	Bipartisan government relations
Cassidy & Associates	$30.6M	Independent government relations
Crossroads Strategies	$28.3M	Government relations
Mehlman Consulting	$28.3M	Bipartisan policy / government relations
Continental Strategy	$27.4M	Government relations / strategic advisory
Forbes Tate Partners	$26.4M	Government relations / public affairs
Mercury	$25.4M	Public affairs / government relations
Capitol Counsel	$25.4M	Government relations
S-3 Group	$24.2M	Government relations / public affairs
Tiber Creek Group	$23.8M	Public affairs / government relations
Squire Patton Boggs	$23.5M	Law + public policy
Strategic Marketing Innovations	$22.9M	Specialized federal affairs
Checkmate Government Relations	$22.2M	Government relations
Alpine Group	$21.4M	Government relations
K&L Gates	$20.8M	Law + policy
Van Scoyoc Associates	$19.5M	Government relations
Mindset Advocacy	$18.3M	Government relations

Reuters reported Q2 2026 federal lobbying revenue of approximately $33.2M at Ballard Partners, $21.8M at BGR, $21.63M at Brownstein, $18.26M at Akin, and $15.49M at Cornerstone, describing record or unusually strong quarters at several major firms.

Expanded market table: 25 major federal lobbying registrants (2025 full-year data; research cutoff September 17, 2026)

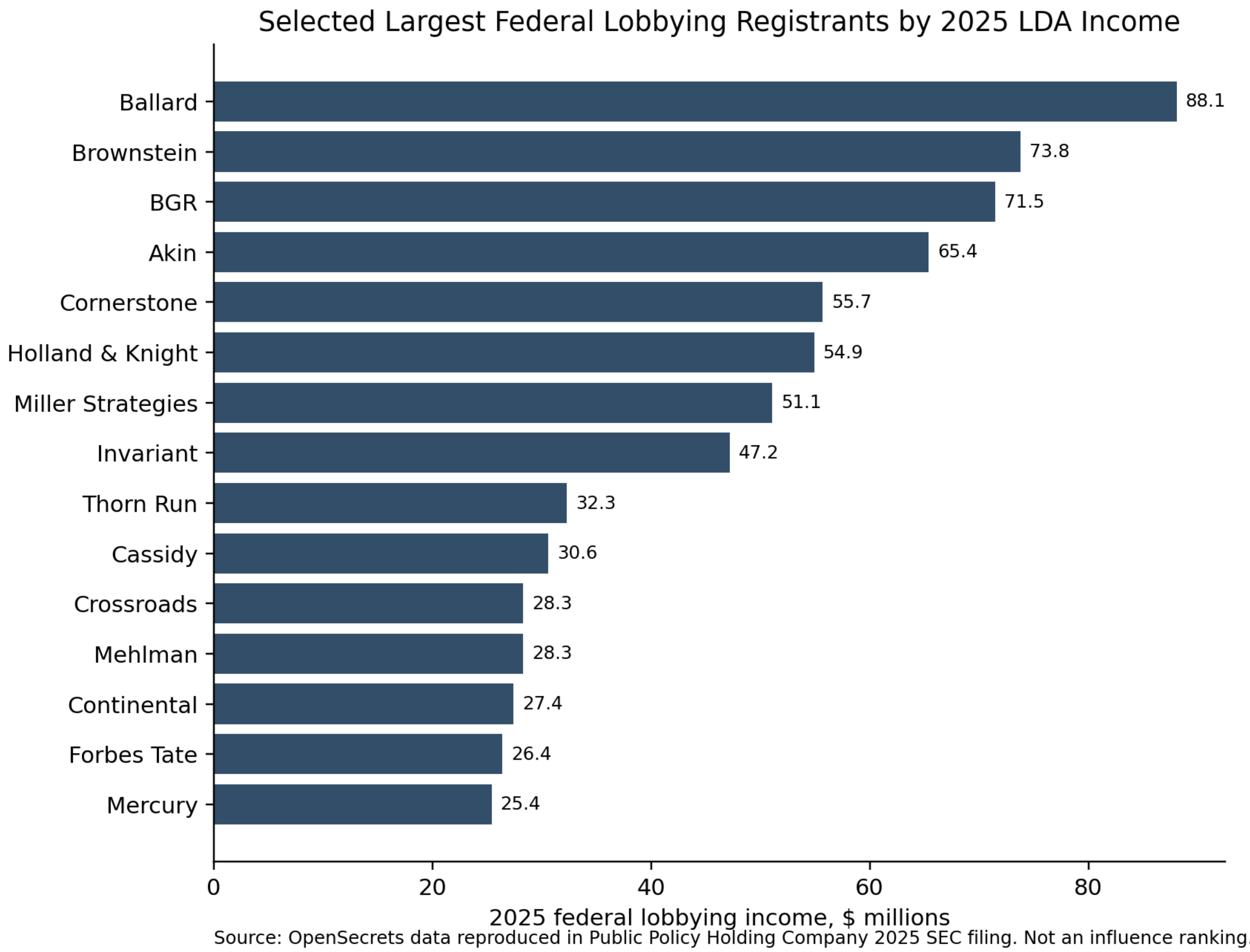


Figure 4. Selected largest federal lobbying registrants by 2025 disclosed lobbying income. This is a revenue table, not an influence ranking.

Firm	Founded / lineage	Model	2025 LDA income	Publicly documented profile
Ballard Partners	1998	Independent GR/public affairs	$88.1M	Founder Brian Ballard; national multi-office platform; current official materials describe broad sector coverage.
Brownstein Hyatt Farber Schreck	1968 firm; DC GR office 1995	Law + GR	$73.8M	Founder Norman Brownstein; DC government-relations practice built as a bipartisan law/GR platform.
BGR Group	1991	GR + public affairs	$71.5M	Founded by Haley Barbour and Ed Rogers; later expanded bipartisan, international, defense and communications capabilities.
Akin	1945 law firm	Law + public policy	$65.4M	Large Washington law and public-policy practice integrating legislative, regulatory and legal work.
Cornerstone Government Affairs	2002	Independent bipartisan GR/public affairs	$55.7M	Began with 10 professionals and 11 clients; official site now describes 225+ professionals across offices.

Firm	Founded / lineage	Model	2025 LDA income	Publicly documented profile
Holland & Knight	1968 predecessor merger lineage	Law + public policy	$54.9M	Bipartisan public-policy and regulation practice spanning Congress and agencies.
Miller Strategies	2017 federal practice era	Independent GR	$51.1M	Founder/CEO Jeff Miller; major federal government-relations practice with Republican-network experience.
Invariant	Public founding year not verified in reviewed materials	GR + communications	$47.2M	Integrated government relations and communications model; current DC office at 740 15th Street NW.
Thorn Run Partners	2010	Independent bipartisan GR	$32.3M	Founded by Andrew Rosenberg and Chris Lamond, with backgrounds in Democratic and Republican Senate offices.
Cassidy & Associates	1975	Independent bipartisan GR	$30.6M	Longstanding firm; current leadership includes Kai Anderson, Jordan Bernstein and Barry Rhoads.
Crossroads Strategies	2010	Bipartisan GR	$28.3M	Founded by longtime advocacy professionals; official materials describe 25+ practitioners and legislative/regulatory work.
Mehlman Consulting	2004	Bipartisan policy/GR	$28.3M	Founded by Bruce Mehlman; combines policy, political and technology/business experience.
Continental Strategy	2021-era current firm	GR/strategic advisory	$27.4M	Founded by former Ambassador Carlos Trujillo; works across technology, health, infrastructure and other sectors.
Forbes Tate Partners	2012	GR/public affairs	$26.4M	Founded by Jeff Forbes and Dan Tate Jr.; expanded from lobbying into communications, research, digital and coalition services.
Mercury Public Affairs	Public founding year varies by corporate lineage	Public affairs/GR	$25.4M	Integrated public strategy and government-relations platform.
Capitol Counsel	2007	Bipartisan GR	$25.4M	Founded by John Raffaelli with founding partners; tax, finance, health, trade and general business work.
S-3 Group	2011	Bipartisan integrated GR/public affairs	$24.2M	Founded by Hill veterans; government affairs, data/analysis, owned content and earned media.
Tiber Creek Group	30+ year lineage; formerly Peck Madigan Jones	Bipartisan GR/public affairs	$23.8M	Government relations, strategic communications, appropriations and sector-specific advocacy.
Squire Patton Boggs	Law-firm lineage	Law + public policy	$23.5M	Global law/public-policy practice with bipartisan former officials and regulatory/legislative capabilities.

Firm	Founded / lineage	Model	2025 LDA income	Publicly documented profile
Strategic Marketing Innovations	Public founding year not verified in reviewed materials	Specialized federal affairs	$22.9M	Defense, advanced manufacturing, technology and federal policy work.
Checkmate Government Relations	Public founding year not verified in reviewed materials	GR/public affairs	$22.2M	Federal/state lobbying, advocacy, public affairs, strategic consulting and political intelligence.
Alpine Group	1996	Bipartisan GR	$21.4M	Independent government-affairs consulting firm with bipartisan, bicameral positioning.
K&L Gates	Global law-firm lineage	Law + public policy	$20.8M	Public Policy and Law practice with former elected, executive, congressional, agency and military personnel.
Van Scoyoc Associates	1990	Independent GR	$19.5M	Founded by H. Stewart Van Scoyoc; official materials describe 55+ lobbyists/staff and 150+ clients.
Mindset	Formerly The Cypress Group; current brand	Bipartisan strategic advisory/advocacy	$18.3M	Internal ownership transferred from founder Pat Cave to a partner group; combines advisory and advocacy.

Method note: the revenue column uses a single OpenSecrets-derived 2025 dataset reproduced in a public SEC filing. Founding dates, headcounts, leadership, network descriptions, and office data are taken from firm materials or public filings where available. A blank or qualified field is preferable to guessing. Client lists change quarterly; representative client examples below are included only when supported by public filings or cited public data.

Ballard Partners

Founded by Brian Ballard in Florida in 1998. The firm expanded nationally and its official materials describe a wide sector portfolio including finance, media, health, critical minerals, AI, energy, transportation, agriculture, real estate, automotive, aerospace and pharmaceuticals. Public LDA-derived data show a very large and diverse client book; representative historical/ongoing clients in public filing aggregations include Amazon, NextEra Energy-related entities, U.S. Sugar and major trade/transport interests. The firm has had personnel with Republican and Trump-administration/campaign connections, while it describes its client service in national rather than party-exclusive terms.[9]

Brownstein Hyatt Farber Schreck

Brownstein is a law firm with a major government-relations practice rather than a pure lobbying boutique. Founder Norman Brownstein established the Washington GR office in 1995. Current firm materials describe bipartisan leadership and a combined legal, regulatory and lobbying platform. The model is valuable when clients need legislative advocacy, agency work, investigations or litigation in the same matter.[10]

BGR Group

BGR was founded in 1991 by Haley Barbour and Ed Rogers, with Lanny Griffith joining in 1994. The firm expanded beyond its Republican origins into a bipartisan government-affairs, international, defense and public-relations platform. Public 2025 client reporting has included major U.S. companies, universities and foreign principals, which illustrates the breadth of a large modern GR platform.[11]

Akin

Akin combines a large Washington law office with a public-law and policy practice. Its current Washington office is at 2001 K Street NW. The integration of lawyers and policy professionals is especially relevant in tax, financial services, energy, trade, healthcare, investigations and regulated industries where statutory interpretation and advocacy are intertwined. Public LDA-derived client histories include major companies, trade groups, tribal governments and financial institutions.[12]

Cornerstone Government Affairs

Cornerstone states that it was founded in 2002 with 10 professionals and 11 clients and now has more than 225 professionals across a multi-office platform. It identifies itself as bipartisan and combines federal/state government relations with public affairs and strategic capabilities. Its headquarters moved to 800 Maine Avenue SW, a useful example of the industry expanding beyond literal K Street.[13]

Holland & Knight

Holland & Knight is a Big Law/public-policy hybrid. Its Public Policy & Regulation practice covers legislative and executive-branch advocacy across healthcare, communications, defense, education, energy, finance, homeland security, tax, transportation and environmental matters. The firm model is particularly useful where advocacy needs to be paired with legal, regulatory or litigation capability.[14]

Thorn Run Partners

Founded in 2010 by Andrew Rosenberg and Chris Lamond, who brought backgrounds associated with Democratic Sen. Edward Kennedy and Republican Sen. Fred Thompson respectively. The firm explicitly describes itself as bipartisan and integrates government relations with strategic communications. Its origin illustrates a recurring competitive logic: bipartisan Senate networks combined with policy specialization.[15]

Cassidy & Associates

Cassidy is one of the older dedicated Washington lobbying firms. Its current materials emphasize a bipartisan team that includes former congressional staff, administration officials, military personnel, scientists and executives. Its operating model reflects the classic independent lobbying boutique: senior practitioners, substantive specialization, and long-term institutional relationships.[16]

Crossroads Strategies

Crossroads was founded in 2010 by longtime advocacy professionals and describes a bipartisan team of more than 25 practitioners. Services include congressional affairs, agency/regulatory lobbying, political-risk analysis and procurement-related work. Its current registered Washington address is on North Capitol Street rather than K Street.[17]

Mehlman Consulting

Founded in 2004 by Bruce Mehlman, a former Commerce Department technology-policy official with private-sector and congressional experience. The firm is structured around bipartisan policy strategy and has long emphasized technology, innovation, business and political analysis.[18]

Forbes Tate Partners

Founded in 2012 by Jeff Forbes and Dan Tate Jr., Forbes Tate expanded from federal government relations into communications, research, digital advocacy and coalition management. It became part of Public Policy Holding Company in 2022, illustrating consolidation through acquisition in the broader public-affairs market.[19]

S-3 Group

S-3 marked its tenth anniversary in 2021, dating the firm to 2011. It describes itself as a bipartisan integrated government-relations and public-affairs consultancy. Services include government affairs, data and analysis, content creation and earned media - a good example of the boundary between lobbying and communications becoming less distinct.[20]

Tiber Creek Group

Tiber Creek, formerly Peck Madigan Jones, describes more than 30 years of lineage and a bipartisan model spanning healthcare, financial services, trade and technology. It also operates specialized affiliated practices and emphasizes appropriations, regulatory strategy and strategic communications. Its current office at 750 9th Street NW further illustrates the geographic dispersion of Washington influence firms.[21]

Squire Patton Boggs

Squire Patton Boggs is a global law firm with a longstanding public-policy practice. Its model combines lobbying, regulatory advocacy, due diligence, investigations and law. Current public materials emphasize bipartisan experience among former officials and staff, illustrating why global clients often prefer a single platform for legal and governmental risk.[22]

K&L Gates

K&L Gates describes a bipartisan Public Policy and Law practice with several hundred years of combined government experience across former congressional, executive, agency and military roles. Its 1601 K Street NW office also makes it one of the major firms in the sample still literally located on K Street.[23]

Van Scoyoc Associates

Founded in 1990 by H. Stewart Van Scoyoc. Official materials describe more than 55 lobbyists/staff and more than 150 clients. The firm historically emphasized hiring experienced senior congressional staff rather than relying solely on former elected officials - a useful illustration of the operational value of staff expertise.[24]

Mindset

Mindset, previously The Cypress Group, describes itself as a bipartisan strategic advisory and advocacy firm. A public ownership announcement states that founder Pat Cave transferred his interest to a group of partners. The firm works across corporate strategy and advocacy, another example of advisory/lobbying convergence.[25]

Capitol Counsel

Capitol Counsel was organized in 2007 around founder John Raffaelli and founding partners. It describes a bipartisan team with backgrounds in Congress, key committees and the executive branch. Core areas include tax, finance, healthcare, international trade and general business matters.[26]

Miller Strategies

Miller Strategies is an independent federal government-relations firm led by Jeff Miller. Public firm materials emphasize relationships across Congress, federal agencies and the White House, and client testimonials identify work for major companies in aerospace, technology and other regulated sectors. Because private firms do not publish complete staffing economics or stable client rosters, the most reliable current client evidence remains quarterly LDA data rather than marketing material.[27]

Invariant

Invariant combines government relations, strategic communications, oversight/investigations advice, coalition management and business-growth advisory work. Current public materials explicitly describe a bipartisan model and a service platform extending beyond traditional lobbying. Current LDA-based aggregations show a large registered-professional roster and a diversified client mix, illustrating the rise of larger integrated boutiques.[28]

Mercury

Mercury is a national public-affairs and government-relations platform rather than a federal-only lobbying boutique. Its current materials describe 13 offices and a bipartisan senior team drawn from government, politics, media and business. The business model integrates lobbying with strategic communications, grassroots mobilization and state/local advocacy.[29]

Strategic Marketing Innovations

Strategic Marketing Innovations (SMI) is a Washington consulting and government-relations firm with a long emphasis on federal funding, technology, universities and public-sector strategy. A recent public procurement filing describes the firm as founded in 1993 and reports a sizable roster of clients, registered lobbyists and research staff. The firm illustrates a specialist model combining appropriations, grant/funding strategy and policy representation.[30]

Checkmate Government Relations

Checkmate is a newer government-relations platform that markets federal/state lobbying, national advocacy, public affairs, strategic consulting, economic-development consulting and political intelligence. Its current Washington presence and service mix illustrate how newer entrants can scale rapidly by combining lobbying with adjacent advisory services rather than relying on a single legacy policy practice.[31]

Alpine Group

Founded in 1996, Alpine Group describes itself as a bipartisan, bicameral government-affairs consulting firm. Current materials emphasize legislative and regulatory advocacy, appropriations, policy analysis, relationship building and strategic guidance; the firm joined Public Policy Holding Company in 2020. Its model illustrates the value of long-tenured relationships combined with sector specialization and a broader public-affairs platform.[32]

Standardized firm-profile audit matrix

The matrix below standardizes the fields that can be responsibly compared. Team counts are reported only where a firm or current public filing source provides a stable figure; otherwise the entry is marked as not publicly standardized. Client rosters are intentionally treated as time-sensitive filing data rather than permanent firm attributes.

Firm	Founded / lineage	Scale evidence	Network / personnel profile
Ballard Partners	1998	Multi-office; exact total not standardized on current public page	Bipartisan bench; founder-led national platform
Brownstein Hyatt Farber Schreck	1968; DC GR office 1995	Large law-firm platform	Bipartisan legal + GR team
BGR Group	1991	Large multidisciplinary GR/public-affairs platform	Historically Republican-founded; now bipartisan/international
Akin	1945	Large law firm with Washington public-law practice	Bipartisan policy professionals + lawyers
Cornerstone Government Affairs	2002	225+ professionals stated by firm	Explicitly bipartisan
Holland & Knight	1968 lineage	Large national law firm	Bipartisan public-policy practice

Firm	Founded / lineage	Scale evidence	Network / personnel profile
Miller Strategies	Modern federal boutique	Not publicly standardized	Republican-network experience with broader federal coverage
Invariant	Integrated boutique	Large registered-professional roster in public filing aggregations	Explicitly bipartisan
Thorn Run Partners	2010	50+ professionals visible on current team page	Explicit bipartisan origin and current balance
Cassidy & Associates	Longstanding Washington boutique	Not publicly standardized	Bipartisan former staff/official mix
Crossroads Strategies	2010	25+ practitioners stated by firm	Explicitly bipartisan
Mehlman Consulting	2004	Boutique; exact count not standardized here	Bipartisan policy strategy
Forbes Tate Partners	2012	Integrated PPHC platform	Bipartisan government relations + communications
S-3 Group	2011	Integrated consultancy	Bipartisan
Tiber Creek Group	30+ years lineage	Not publicly standardized	Bipartisan
Squire Patton Boggs	Global law-firm lineage	Large global platform	Bipartisan former officials/staff
K&L Gates	Global law-firm lineage	Large global platform	Bipartisan public-policy and law practice
Van Scoyoc Associates	1990	55+ lobbyists/staff; 150+ clients stated by firm	Senior congressional-staff expertise emphasized
Mindset	Cypress lineage	Not publicly standardized	Bipartisan strategic advisory
Capitol Counsel	2007	Not publicly standardized	Bipartisan former committee/executive experience
Mercury	National platform	13 offices stated by firm	Bipartisan senior talent
Strategic Marketing Innovations	1993	Public contract filing: 13 lobbyists + 4 research/policy + 4 admin at filing date	Federal funding and policy specialists
Checkmate Government Relations	2023 public profile	Small/newer platform; public sources vary	Federal/state multidisciplinary team
Alpine Group	1996	Boutique within PPHC	Bipartisan, bicameral

Firm profiles: sector focus and verification

Firm	Principal sectors	Verification note
Ballard Partners	Finance, energy, transportation, tech/AI, health, agriculture	Use quarterly LDA for client roster
Brownstein Hyatt Farber Schreck	Tax, energy, natural resources, finance, health, regulated industries	Law + GR integration is core differentiator
BGR Group	Defense, international, commerce, public affairs	Client mix changes by filing period
Akin	Tax, finance, energy, trade, health, investigations	Public LDA and law-firm matters provide evidence
Cornerstone Government Affairs	Federal/state GR, public affairs, agriculture, health, energy, appropriations	Firm-published scale figure
Holland & Knight	Health, communications, defense, energy, finance, tax, transport	Legal/regulatory/lobbying integration
Miller Strategies	Aerospace, technology, business regulation	Use LDA for roster and quarterly activity
Invariant	Tax, defense, finance, trade, environment, tech	Government relations + communications/advisory
Thorn Run Partners	Health, finance, national security, transport, energy	Official team page provides current personnel visibility
Cassidy & Associates	Appropriations, defense, higher education, infrastructure, business	Independent senior-practitioner model
Crossroads Strategies	Congressional, agency/regulatory, procurement, risk analysis	Scale published by firm
Mehlman Consulting	Technology, innovation, business and political analysis	Advisory + GR positioning
Forbes Tate Partners	Tax, health, energy, business, coalitions	Acquired by PPHC in 2022
S-3 Group	GR, data/analysis, content, earned media	Illustrates lobbying/communications convergence
Tiber Creek Group	Health, finance, trade, technology, appropriations	Former Peck Madigan Jones lineage
Squire Patton Boggs	Public policy, investigations, regulatory, international	Global legal + policy platform
K&L Gates	Policy, regulation, trade, tax, infrastructure	Current K Street office; legal + lobbying model
Van Scoyoc Associates	Appropriations, higher education, infrastructure, defense	Official site publishes scale
Mindset	Corporate strategy, policy, advocacy	Internal ownership-transfer model
Capitol Counsel	Tax, finance, health, trade, business	Senior boutique model
Mercury	Federal/state GR, public affairs, grassroots, communications	Integrated national public-affairs platform
Strategic Marketing Innovations	Technology, universities, grants, federal marketing	Use dated public-procurement filing cautiously

Firm	Principal sectors	Verification note
Checkmate Government Relations	Banking, aviation, real estate, health, tech, energy	Rapid-growth entrant; current LDA more reliable than static marketing
Alpine Group	Appropriations, energy, technology, health, infrastructure	Joined PPHC in 2020

How to interpret firm comparisons without creating a political ranking

A firm profile should therefore be read across five dimensions: disclosed federal lobbying income; personnel and prior-government experience; committee and agency specialization; sector mix; and the durability of client relationships. Public revenue data can measure commercial scale, but no public dataset directly measures private advice quality, trust, or causal policy influence.[33,34]

Client books are update-sensitive. Rather than freeze a potentially stale list into a purported “major clients” ranking, this edition treats LDA filings as the authoritative quarterly record and uses representative publicly documented matters only where a primary filing or firm source supports the description. This controlled approach reduces the risk of converting a temporary engagement into a misleading statement about a firm’s permanent identity.[35]

Firm revenue is observable; policy effectiveness is not directly observable. A high-revenue firm may have a large client book, high retainers, more registered work, or a favorable political-network cycle. None of those variables proves that the firm caused more policy outcomes. A defensible comparison therefore separates: (1) reported lobbying income; (2) sector and procedural expertise; (3) documented personnel backgrounds; (4) breadth of bipartisan or administration-specific networks; (5) client retention and scale where disclosed; and (6) publicly documented matter outcomes. The report does not collapse those dimensions into a score or best/worst ordering.[36]

PART VII. K STREET

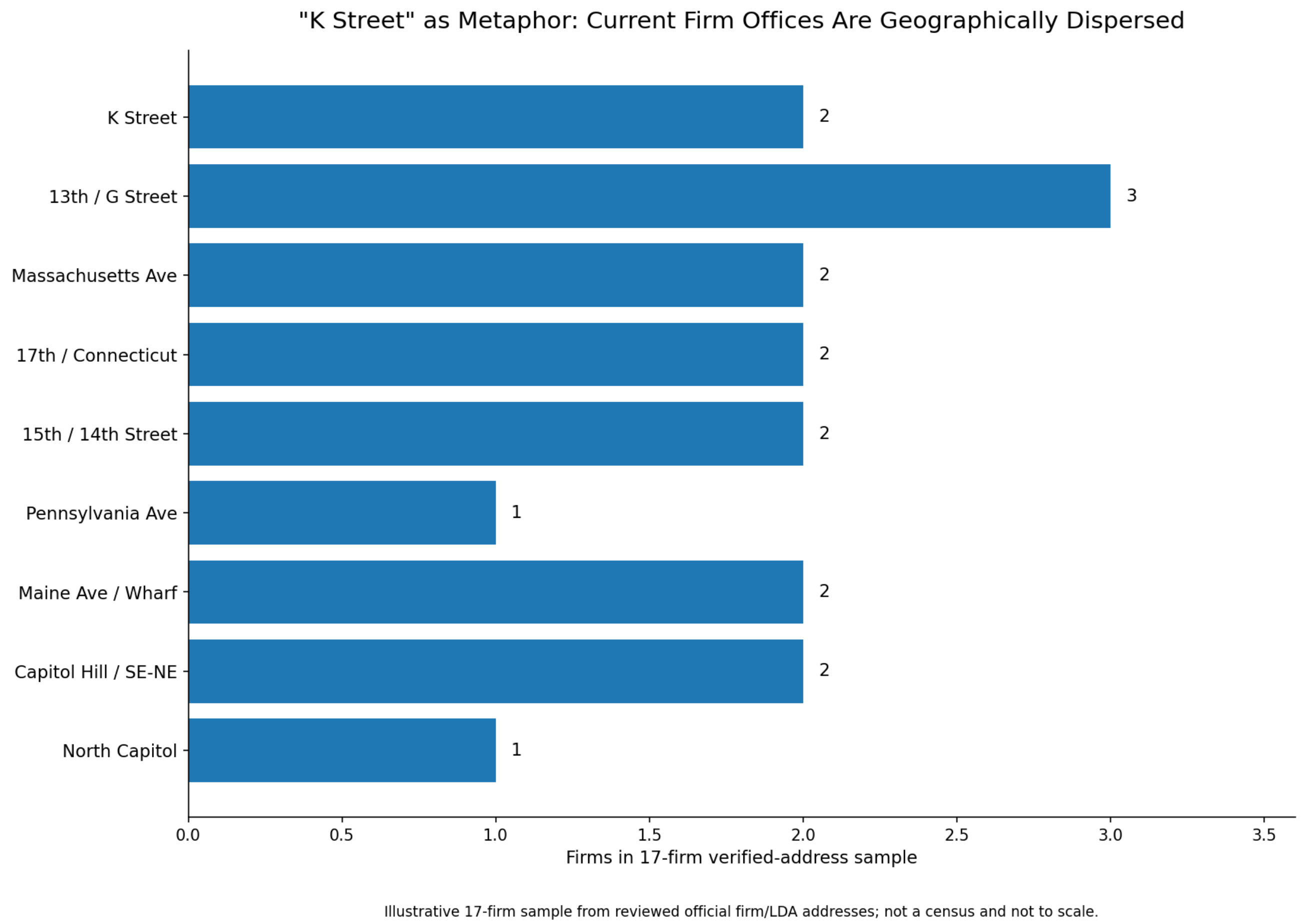


Figure 5. K Street as metaphor: illustrative current office geography of selected major firms.

K Street became associated with major law, lobbying, consulting, and public-affairs firms during the postwar expansion of Washington and the professionalization of lobbying in the 1970s and 1980s. The term now functions primarily as political and journalistic metonymy rather than as a precise geographic description.

Major lobbying operations have long been distributed throughout downtown Washington, Pennsylvania Avenue, the East End, Capitol Hill-adjacent offices, the Southwest waterfront, and other business districts. Thus K Street functions much as Wall Street functions in finance: an industry symbol that outlives strict geographic concentration.

Current geography: testing the literal K Street hypothesis (verified to research cutoff)

The proper empirical test is address-based rather than symbolic: take a defined sample of major registrants, record their current Washington office addresses from firm websites or LDA records, geocode those addresses, and calculate the share physically located on K Street versus nearby downtown, Pennsylvania Avenue, Connecticut Avenue, Capitol Hill and Southwest locations. The qualitative evidence in this edition supports the conclusion that “K Street” is a dispersed metropolitan policy-services cluster rather than a single street corridor; a future reproducible dataset should publish the sample definition and coordinates rather than rely on anecdotes.[37]

Table 1. Verified-address directory for 17 major Washington firms. Only two in this illustrative sample list literal K Street addresses; this is not a census.

Selected firm	Current verified Washington address
Ballard Partners	601 13th St NW
BGR Group	601 13th St NW
Brownstein Hyatt	600 Massachusetts Ave NW
Akin	2001 K St NW

Selected firm	Current verified Washington address
Holland & Knight	800 17th St NW
Invariant	740 15th St NW
Thorn Run Partners	100 M St SE
Cassidy & Associates	607 14th St NW
Crossroads Strategies	800 North Capitol St NW
Mehlman Consulting	1341 G St NW
Continental Strategy	1747 Pennsylvania Ave NW
Mercury	1130 Connecticut Ave NW
S-3 Group	418 C St NE
Strategic Marketing Innovations	200 Massachusetts Ave NW
K&L Gates	1601 K St NW
Cornerstone Government Affairs	800 Maine Ave SW
Van Scoyoc Associates	800 Maine Ave SW

The sample demonstrates why K Street should be treated as metonymy rather than a literal spatial boundary. Major influence firms cluster throughout the central business district, Pennsylvania/Massachusetts avenues, 13th-17th Street corridors, North Capitol, Capitol Hill-adjacent neighborhoods, and the Wharf/Maine Avenue. Proximity still matters because congressional, executive and agency institutions are concentrated in Washington, but modern communications, hybrid work and distributed offices reduce the significance of any single street.

PART VIII. WHAT DO LOBBYISTS ACTUALLY DO?

The professional stereotype emphasizes lunches, receptions, and high-level meetings. The operational reality includes extensive reading, drafting, monitoring, internal coordination, coalition management, and staff-level work.

Typical period	Illustrative work
Early morning	Policy and news monitoring; committee schedules; Federal Register review; client alerts
Morning	Internal/client calls; Hill and agency staff meetings
Midday	Coalition and trade association meetings; stakeholder calls
Afternoon	Committee outreach; agency engagement; hearings; drafting; research
Late afternoon	Client briefings; follow-up; amendment and regulatory analysis
Evening	Events, relationship maintenance, preparation for next day

- Bill and amendment analysis
- Legislative histories
- Regulatory comments
- Briefing papers
- Talking points
- Hearing questions and witness preparation
- Stakeholder maps
- Coalition letters
- Appropriations requests
- Political and procedural intelligence
- Executive briefings

Hall and Deardorff's legislative-subsidy model is useful because it captures an underappreciated element of lobbying: outside organizations can supply allied policymakers with additional research, legislative labor, political information, and technical capacity.[38]

PART IX. THE TECHNIQUES OF CONGRESSIONAL LOBBYING

Stage	What lobbyists can realistically do
1. Before introduction	Define problem; map jurisdiction; research existing law; test political feasibility; draft concepts.
2. Sponsor	Identify plausible sponsors; conduct technical briefings; refine text.
3. Co-sponsors	Educate offices; mobilize coalition; demonstrate constituency relevance.
4. Committee referral	Analyze jurisdiction and possible multiple referrals.
5. Subcommittee	Engage specialized staff and relevant stakeholders.
6. Hearing	Prepare witnesses, questions, evidence, and rebuttal material.
7. Markup	Track text and negotiations in real time; propose technical revisions.
8. Amendment	Draft or critique language; assess legal, fiscal, and operational effects.
9. Committee vote	Communicate positions; assess likely support and procedural risks.
10. Floor scheduling	Monitor leadership, rules, holds, unanimous-consent dynamics, and legislative vehicles.
11. Floor vote	Member education; amendment analysis; coalition communication.
12. Conference / bicameral resolution	Compare House and Senate language; defend priority provisions.
13. Presidential action	Engage relevant executive-policy offices; provide implementation analysis.
14. Implementation	Shift toward agencies, rulemaking, guidance, grants, procurement, and compliance.

Timing principle

The value of lobbying is highly stage-dependent. By the time an issue reaches final floor consideration, the most important drafting and coalition choices may already be locked in. Early committee and agency work can therefore matter more than a high-profile meeting late in the process.

Figure 6. A bill creates different influence opportunities at different procedural stages.

Operational principle: influence is path-dependent

The procedural stage determines what is realistically changeable. Before introduction, lobbyists can help clients define the problem, identify jurisdiction, test language and recruit validators. At hearing and markup, technical drafting, witness preparation and amendment analysis become central. Near floor action, the feasible objective often narrows to vote education, rules, amendments, timing, or damage limitation. After enactment, the locus of influence frequently moves from Congress to agencies, OMB, procurement offices and courts. Successful government affairs is therefore less about a single persuasive meeting than about maintaining an accurate map of the policy process over time.

PART X. THE IMPORTANCE OF CONGRESSIONAL STAFF

Position	Operational function
Legislative Assistant	Owns a substantive policy portfolio; tracks bills; briefs Member; interacts with stakeholders.
Legislative Director	Coordinates legislative strategy and policy portfolio across the personal office.
Chief of Staff	Runs the office; sets priorities with Member; manages senior political and organizational decisions.
Committee Counsel	Provides legal, jurisdictional, drafting, and oversight expertise.
Committee Staff Director	Runs committee staff and helps manage agenda, hearings, negotiations, and strategy.
Professional Staff Member	Develops deep specialized expertise; prepares legislation, hearings, investigations, and oversight.

Lobbyists frequently interact more with staff than with Members because staff read legislation, prepare hearings, negotiate language, brief principals, communicate with agencies, and maintain technical continuity. This is one reason a highly capable former committee staffer can be commercially more useful than a former elected official in a specialized policy market.[39]

PART XI. REGULATORY LOBBYING

Congressional lobbying often asks what a statute should say. Regulatory lobbying often asks how an existing statute should be interpreted, implemented, enforced, or operationalized.

Typical rulemaking chain

Statute -> agency research -> proposed rule / notice -> Federal Register -> public comment -> technical submissions and meetings -> agency analysis -> OMB/OIRA review where applicable -> final rule -> implementation -> possible litigation or congressional review.

Policy area	Primary federal targets
Securities / capital markets	SEC
Competition / antitrust	FTC, DOJ
Communications	FCC, NTIA
Pharmaceuticals / medical products	FDA, HHS, CMS
Environment	EPA
Financial services	Treasury, Federal Reserve, CFPB, SEC
Trade / industrial policy	Commerce, USTR
Energy	DOE, FERC, EPA
Defense	Department of Defense and military services
Consumer finance	CFPB

OIRA procedures permit outside participants to request meetings concerning regulatory actions under review. These meetings are generally listening sessions and do not replace formal rulemaking comments. Technical expertise is often especially valuable because agencies need evidence concerning engineering feasibility, economic effects, compliance costs, market structure, safety, and implementation.[40]

U.S. Government Accountability Office. 2026. 2025 Lobbying Disclosure: Observations on Compliance with Requirements. GAO-26-108486. https://www.gao.gov/products/gao-26-108486

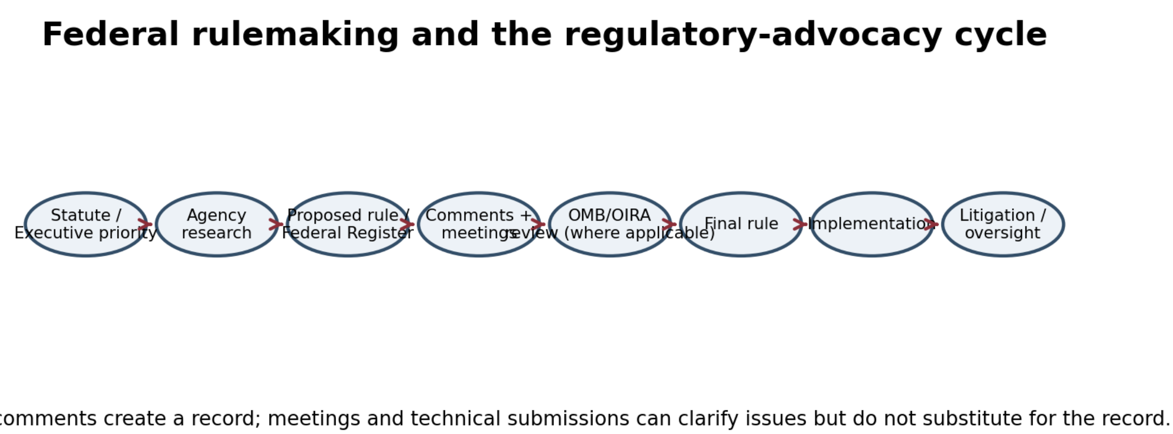


Figure 7. Federal rulemaking and the regulatory-advocacy cycle.

Agency-specific mini-cases: why regulatory lobbying is not one market

SEC: A securities campaign typically begins with statutory and economic analysis, then tracks the Commission agenda and proposal, builds a record through formal comment letters, technical data and meetings, and prepares for implementation or litigation. The persuasive currency is often market microstructure, investor-protection evidence, operational feasibility and statutory authority - not simply political access.[41]

FDA/CMS: Drug and device firms operate in two different policy logics. FDA engagement focuses on scientific evidence, approval, safety and manufacturing; CMS engagement focuses on coverage, reimbursement and program implementation. A Washington strategy that treats “health regulation” as one venue can therefore miss the actual decision-maker.[42]

EPA/DOE/FERC: Energy and environmental rules frequently require engineering, emissions, grid, cost and reliability evidence. Coalition design matters because utilities, fuel producers, manufacturers, environmental organizations and state regulators can experience the same rule differently. Technical comments and implementation alternatives can be more consequential than generalized political messaging.[43]

FCC/NTIA: Spectrum and communications advocacy combines adjudicatory, licensing, technical and legislative elements. Engineers and economists often work beside lawyers and government-relations professionals because interference, allocation and network-design evidence can determine whether a policy proposal is administratively usable.[44]

DOD: Defense advocacy must distinguish policy, appropriations and lawful acquisition engagement from impermissible pressure or misuse of appropriated funds. The acquisition system creates long time horizons: requirements, testing, budget submissions, authorization, appropriations, contracting and oversight can all become separate engagement points.[45]

Institution	Typical policy terrain	Advocacy inputs
SEC	Securities disclosure, market structure, investment advisers, digital assets	Lawyers, compliance officers, economists, market-structure specialists; comment letters; meetings; enforcement context
FTC	Competition and consumer protection	Antitrust counsel, economists, industry data, rule comments, merger/investigation strategy
FCC	Spectrum, broadband, media ownership, communications rules	Engineers, economists, communications counsel, carrier/platform coalitions
FDA	Drug/device approval standards, safety, labeling, tobacco	Clinical/scientific evidence, administrative law, reimbursement and public-health interfaces
EPA	Air, water, chemicals, emissions, permitting	Engineering models, cost data, environmental science, state implementation concerns
Federal Reserve	Bank capital, payments, supervision, systemic risk	Bank regulatory counsel, economists, quantitative capital/liquidity expertise
CFPB	Consumer finance, payments, credit reporting	Consumer-finance law, operational data, small-bank/fintech impact analysis
Treasury	Tax implementation, sanctions, financial policy, industrial credits	Tax lawyers, economists, sanctions/trade specialists, corporate finance
Commerce	Export controls, semiconductors, trade/industrial policy	National-security, supply-chain, technology and manufacturing specialists
DOD	Procurement, industrial base, defense policy	Acquisition experts, engineers, former military/civilian officials, appropriations teams

Regulatory advocacy is strongest when it converts a political preference into administrative evidence. Agencies must build records, apply statutory authority, respond to significant comments, and consider technical constraints. That creates demand for empirical submissions: cost curves, engineering feasibility, market data, clinical studies, operational timelines, small-entity effects, security risks, and implementation alternatives. This is one reason a technically specialized former agency professional can be more valuable than a purely political celebrity.[46]

PART XII. EXECUTIVE BRANCH LOBBYING

Executive-branch lobbying can focus on the White House, OMB/OIRA, the National Economic Council, the National Security Council, cabinet departments, independent agencies, and career officials. Organized interests seek to influence regulatory priorities, administrative interpretation, procurement, trade policy, sanctions, grants, executive orders, technical guidance, and enforcement priorities.

The importance of this arena rises when Congress delegates substantial implementation authority or when major policy is pursued through executive and administrative mechanisms. The practical target is often not the President, but the policy office, agency bureau, career staff, or review process with actual jurisdiction over the decision.

Operational targeting logic

Executive-branch influence is most effective when the target is defined by decision authority rather than prestige. A practical sequence is: identify the legal or delegated authority; locate the office that owns the decision; determine the interagency or clearance path; identify the staff level that controls the record or recommendation; and intervene while the decision remains procedurally open. In rulemaking, that can mean agency career staff and OIRA review. In procurement, it can mean program and acquisition offices. In trade or sanctions, it can require an interagency process rather than a single political principal.

The operational implication is that access to a senior official is valuable only when it connects to the actual decision process. A sophisticated Government Affairs team therefore maps formal jurisdiction, informal coordination, technical staff, political appointees, White House review, and implementation responsibility separately.

PART XIII. CAMPAIGN FINANCE AND LOBBYING

Foundational distinction

Lobbying is not campaign finance. Lobbying concerns attempts to influence government policy. Campaign finance concerns financing electoral political activity under a different body of law and disclosure rules. The two systems can interact politically without becoming legally identical.

For the 2025-2026 federal cycle, individuals may generally contribute up to $3,500 per election to a federal candidate committee, while multicandidate PACs operate under separate limits. Super PACs may accept unlimited contributions from permissible sources for independent expenditures, subject to rules regarding coordination and prohibited contributions.

The legal boundary is not whether a donor or lobbyist gains access; access can arise lawfully from political participation and relationships. The central criminal concern is an unlawful quid pro quo - an exchange of a thing of value for official action - together with other applicable campaign-finance, bribery, gratuity, honest-services, and ethics restrictions.[47,48]

PART XIV. THE REVOLVING DOOR

Government service can create three types of commercially valuable capital: substantive knowledge, institutional credibility, and relationships. Common pathways include Congress -> lobbying firm; congressional staff -> lobbying firm; White House -> consulting/lobbying; agency -> industry; industry -> agency; and lobbying firm -> administration.

Blanes i Vidal, Draca, and Fons-Rosen found that lobbyists previously connected to a senator experienced an average 24% decline in generated revenue when the senator left office. This is unusually direct evidence that relationship capital has measurable market value.

Selected federal post-employment restrictions

- Former House Members generally face a one-year restriction on certain representational contacts with Congress; covered House staff may face one-year restrictions involving former offices or committees.
- Former senators who enter covered lobbying employment generally face a two-year Senate lobbying restriction; covered senior Senate staff generally face a one-year restriction.
- 18 U.S.C. 207 includes permanent restrictions involving certain particular matters personally and substantially handled, two-year restrictions for certain matters under official responsibility, and additional one- or two-year cooling-off rules for senior and very senior executive officials.
- Additional restrictions can apply to representation of foreign entities and to executive-order ethics pledges, depending on the administration and official.[49,50,51]

PART XV. THE TALENT MARKET FOR LOBBYING FIRMS

- Political and institutional networks
- Subject-matter expertise
- Legal and regulatory knowledge
- Knowledge of congressional procedure
- Negotiation
- Clear writing
- Oral communication
- Coalition building
- Political intelligence and information synthesis
- Client management
- Business development

The highest-value professional often combines network capital, policy expertise, procedural knowledge, communication, judgment, and client trust. A former Member may contribute visibility and broad relationships, while an exceptional former staffer can contribute exact committee procedure, drafting skill, dense working-level relationships, agency contacts, and deep specialized policy knowledge.

Four recurring talent archetypes

High-performing teams usually combine four types of capital: network-heavy generalists who can open institutional channels; committee specialists who understand congressional procedure and staff networks; agency specialists who understand rulemaking and implementation; and substantive experts who can translate technical evidence into policy language. The commercial advantage comes from combining these capabilities rather than assuming that fame or prior title is sufficient.

This helps explain why a former committee counsel, staff director, professional staff member, or senior regulator may be more useful on a technically demanding engagement than a nationally known former officeholder. The question is not simply who the professional knows, but what institutional work the professional can reliably perform once access is obtained.

PART XVI. BUSINESS DEVELOPMENT IN LOBBYING FIRMS

At partner level, lobbying is simultaneously a professional practice and a sales business. Clients commonly arrive through personal networks, referrals, law firms, trade associations, former government contacts, sector specialization, crises, investigations, regulatory change, mergers, new legislation, elections, and geopolitical events.

Professional service	What the rainmaker effectively sells
Investment banking	Transaction judgment, execution capacity, capital-market and corporate relationships
Law firm	Legal judgment, credibility, responsiveness, and client relationship
Management consulting	Problem-solving platform and delivery team
Lobbying	Political judgment, policy expertise, access, institutional navigation, and execution

A senior lobbyist with strong connections but weak execution may lose clients; a brilliant technician who cannot originate work may remain economically dependent on rainmakers. The commercially durable partner generally combines origination with delivery or builds a team in which those functions reinforce one another.

Deep dive: the lobbying-firm business-development funnel

Stage	What happens	Commercial risk
Market sensing	Partners track elections, rulemakings, investigations, mergers, crises and legislation that create client need.	Chasing headlines without sector credibility
Lead generation	Referrals from lawyers, trade groups, executives, former clients, investors and professional networks.	Overdependence on one rainmaker
Qualification	Conflict check, legal-registration analysis, budget, decision-maker mapping, client expectations.	Accepting unregistrable, conflicted or reputationally problematic work
Pitch / RFP	Team biographies, network coverage, issue diagnosis, work plan, pricing, reporting cadence.	Selling access without execution plan
Engagement design	Scope, retainer/project fee, staffing, deliverables, compliance and termination terms.	Underpricing senior time or overpromising outcomes
First 90 days	Stakeholder map, issue baseline, meeting plan, coalition audit, reporting rhythm.	Failure to demonstrate process value quickly
Retention / cross-sell	Move from issue project to standing retainer; add regulatory, state, communications or coalition capability.	Scope creep and conflicts

Origination credit and the rainmaker problem

Partner compensation must reward client origination without discouraging the team that services the engagement. Private firms rarely publish formulas, but common components include base draw or salary, collected revenue, origination and cross-selling credit, matter management, and discretionary profit allocation. Too much origination weight can create silos; too little can encourage rainmakers to leave with portable clients.

Client acquisition is a core partner skill but not a substitute for execution. A rainmaker without credible policy teams may win mandates and lose renewals; a strong technician who never originates may remain economically dependent on senior partners. Scalable firms institutionalize client relationships so service quality, knowledge, and team depth reduce dependence on any one individual.

Pricing logic

Retainers dominate because clients pay for persistent readiness: monitoring, interpretation, senior judgment, rapid response, drafting, and coalition intelligence. Project fees fit discrete endpoints such as filings, transactions, hearings, legislative windows, procurement efforts, or crises. Success fees can raise legal and ethical issues and are not the default federal lobbying model.

PART XVII. LOBBYING BY INDUSTRY

Industry	Core policy issues	Primary targets
Banking	Capital, payments, consumer rules	Federal Reserve, Treasury, CFPB, Congress
Securities	Market structure, disclosures, fiduciary rules	SEC, Congress
Private Equity / Hedge Funds	Tax, securities, systemic risk	SEC, Treasury, Congress
Insurance	Capital, tax, healthcare	Congress, Treasury, HHS
Pharmaceuticals	FDA approval, patents, Medicare pricing	FDA, CMS, Congress
Healthcare	Reimbursement, coverage, competition	CMS/HHS, Congress
Defense	Authorization, appropriations, procurement	DOD, Armed Services, Appropriations
Technology	Competition, privacy, content, tax	FTC, DOJ, FCC, Congress
Artificial Intelligence	Safety, liability, procurement, export controls	Commerce, DOD, White House, Congress
Telecommunications	Spectrum, broadband, competition	FCC, NTIA, Congress
Oil & Gas	Leasing, taxation, emissions	Interior, EPA, DOE, Congress
Renewable Energy	Tax credits, permitting, grid	Treasury, DOE, FERC, Congress
Automobile	Emissions, EV policy, trade	EPA, DOT, Commerce, Congress
Airlines	Safety, consumer policy, competition	FAA, DOT, Congress
Agriculture	Farm bill, commodities, trade	USDA, USTR, Congress
Food	Safety, labeling, agriculture rules	FDA, USDA, Congress
Media / Entertainment	Copyright, ownership, AI, content	FCC, Copyright Office, Congress
Real Estate	Housing finance, taxation, zoning-related federal issues	HUD, FHFA, Congress
Cryptocurrency	Market structure, stablecoins, AML	SEC, CFTC, Treasury, Congress
Tobacco	FDA regulation, tax	FDA, Congress
Labor	Collective bargaining, workplace rules	DOL, NLRB, Congress

AI is a rapidly expanding example. The Financial Times reported that OpenAI spent approximately $2.22 million and Anthropic about $3.53 million on federal lobbying in the first half of 2026, alongside continued engagement by larger technology companies. These figures illustrate rapid sectoral institutionalization rather than proving any particular policy effect.[52]

Expanded industry-by-industry matrix

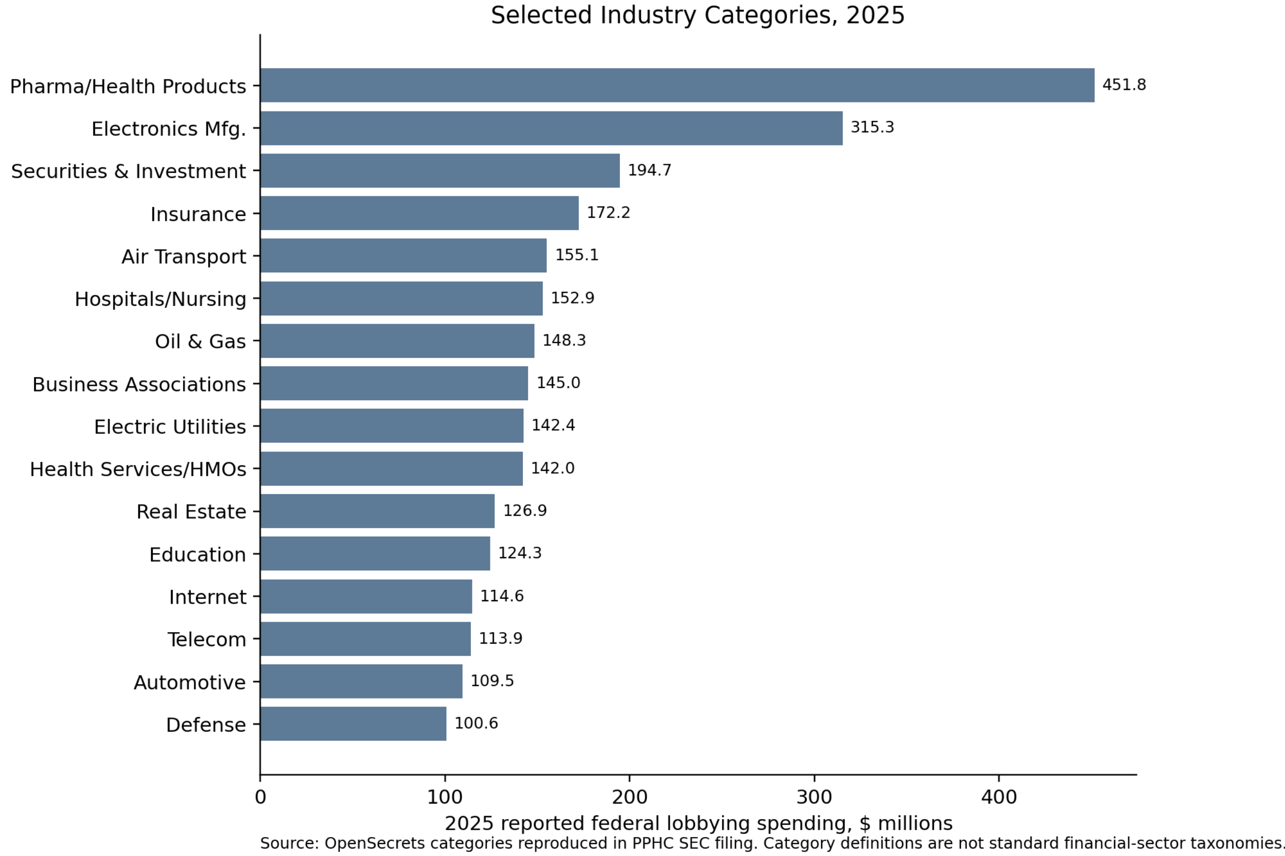


Figure 8. Selected 2025 federal lobbying-spending categories. Category definitions follow the cited OpenSecrets dataset.

Sector	2025 spend signal	Core policy issues	Primary federal targets	Representative associations
Finance / Banking	$194.7M securities/investment; insurance $172.2M	Capital/liquidity, payments, bank supervision, consumer finance, tax	Fed, Treasury, CFPB, SEC, OCC/FDIC, Congress	ABA; SIFMA; BPI; FSF
Private Equity / Hedge Funds	Included principally in securities/investment categories	Tax treatment, SEC rules, disclosure, systemic-risk policy	SEC, Treasury, Congress	AIC and sector coalitions
Pharmaceuticals	$451.8M pharma/health products	FDA standards, patents, Medicare pricing, reimbursement, PBMs	FDA, CMS/HHS, Congress, PTO	PhRMA; BIO
Healthcare	$152.9M hospitals; $142.0M health services/HMOs	Medicare/Medicaid reimbursement, coverage, workforce, consolidation	CMS/HHS, FTC, Congress	AHA; AHIP; AMA and specialty groups
Defense	$100.6M miscellaneous defense category	Authorization, appropriations, procurement, export controls, industrial base	DOD, Congress, State, Commerce	AIA; NDIA and contractor coalitions
Technology / Internet	$114.6M internet plus electronics $315.3M category	Antitrust, privacy, AI, cybersecurity, tax, content, procurement	FTC, DOJ, Commerce, FCC, Congress, White House	CCIA; Chamber groups; sector coalitions
Artificial Intelligence	Fast-growing subcategory not cleanly isolated in legacy taxonomy	Model rules, data centers, export controls, liability, procurement, state preemption	White House, Commerce, DOD, Congress, FTC	Company-specific + technology associations
Telecommunications	$113.9M	Spectrum, broadband, universal service, competition, infrastructure	FCC, NTIA, Congress	USTelecom; CTIA; NCTA
Oil & Gas	$148.3M	Leasing, permitting, methane/emissions, LNG, tax	Interior, EPA, DOE, FERC, Congress	API and producer associations

Sector	2025 spend signal	Core policy issues	Primary federal targets	Representative associations
Renewable Energy	Spread across energy/electric categories	Tax credits, grid, permitting, trade, domestic content	Treasury, DOE, FERC, Commerce, Congress	ACP; SEIA and technology associations
Automotive	$109.5M	Emissions, fuel economy, EV credits, trade, safety, connected vehicles	EPA, DOT/NHTSA, Commerce, Treasury, Congress	Alliance for Automotive Innovation
Airlines	$155.1M air transport	Safety, competition, fees, slots, labor, air traffic	FAA/DOT, Congress	Airlines for America
Agriculture	Multiple commodity categories	Farm Bill, crop insurance, trade, biofuels, nutrition	USDA, USTR, EPA, Congress	Commodity groups; Farm Bureau
Food	Food processing/agriculture categories	Labeling, safety, nutrition, trade	FDA, USDA, FTC, Congress	FMI; Consumer Brands and commodity groups
Media / Entertainment	Distributed across media, internet, copyright categories	Copyright, ownership, retransmission, AI training, labor	FCC, Copyright Office, Congress, FTC	MPA; NAB and sector coalitions
Real Estate	$126.9M	Housing finance, tax, zoning/federal land, insurance, mortgage policy	HUD, FHFA, Treasury, Congress	National Association of Realtors; MBA
Cryptocurrency	Often included in securities/investment and internet categories	Market structure, stablecoins, AML, custody, taxation	SEC, CFTC, Treasury, banking regulators, Congress	Company/industry coalitions
Tobacco	Separate industry categories vary	FDA product standards, tax, marketing, harm reduction	FDA, Treasury, Congress	Company and association advocacy
Labor	Labor-union categories separate from business associations	Collective bargaining, wages, workplace rules, pensions, trade	DOL, NLRB, Congress	AFL-CIO; sector unions
Semiconductors	Part of electronics manufacturing/equipment	$CHIPS implementation, export controls, tax credits, permitting, workforce	Commerce, Treasury, DOD, Congress	SIA; SEMI

The table should not be read as a ranking of political power. Reported spending differs because sectors face different numbers of rules, different degrees of fragmentation, different use of in-house versus outside representation, and different classification practices. A pharmaceutical dollar and a defense dollar may purchase very different mixes of scientific, legal, procurement and legislative work.

AI as a new lobbying market

In the first half of 2026, the Financial Times reported that OpenAI spent about $2.22 million and Anthropic about $3.53 million on federal lobbying, while larger technology companies also increased activity. The sector illustrates how new lobbying markets form before a mature statutory framework exists: firms simultaneously engage on export controls, national-security policy, infrastructure and electricity needs, federal procurement, liability, transparency, competition and the relationship between federal and state rules.

Sector deep dives: how the lobbying problem changes by industry

Finance, banking, securities, private equity, and hedge funds

The sector is institutionally fragmented even when its public-policy interests overlap. Depository banks face prudential capital, liquidity, payments, consumer-protection, sanctions and anti-money-laundering questions; securities firms face market-structure, disclosure and broker-dealer rules; private funds confront adviser regulation, tax treatment, systemic-risk reporting and transaction rules. Consequently, effective representation usually requires multiple channels at once: authorizing and appropriations committees, Treasury, the Federal Reserve, SEC, CFPB, CFTC and - in litigation-sensitive matters - DOJ and the courts.[53]

The principal strategic problem is often sequencing. A statutory objective pursued in Congress can be implemented through agency rules years later, while supervisory guidance or examination practice may change incentives before legislation moves. In-house government-affairs teams therefore tend to retain outside counsel or specialist lobbyists for discrete committee, agency or tax expertise rather than outsource the whole political function. For investors, this is also a political-intelligence market: the valuable information is usually not a rumor about a vote but a disciplined assessment of jurisdiction, timing, administrative discretion and implementation risk.[54]

Financial-services lobbying is unusually fragmented because different institutions control different layers of the policy stack. Congress writes tax, securities and banking statutes; the Federal Reserve, OCC and FDIC supervise banks; the SEC regulates securities markets and investment advisers; the CFPB regulates consumer-finance practices; Treasury often coordinates sanctions, tax implementation and financial policy. As a result, sophisticated firms rarely treat “finance” as one target. They map the issue by jurisdiction, then assign specialists to committees, prudential regulators, market regulators and Treasury.

The substantive agenda can include capital and liquidity rules, payment systems, market structure, fiduciary obligations, private-fund regulation, tax treatment, anti-money-laundering obligations and systemic-risk policy. Technical credibility is especially important because regulatory details can alter balance-sheet economics without generating mass public attention. Trade associations such as the American Bankers Association, SIFMA, the Bank Policy Institute and asset-management organizations provide collective positions, while large institutions preserve direct in-house representation for company-specific exposure.

Strategic pattern: finance illustrates why money spent is not a sufficient measure of influence. A large bank may lobby defensively against one proposal while simultaneously seeking implementation clarity on another. Success may mean narrowing a definition, extending a transition period, changing a capital calculation, or preventing a provision from entering a bill at all.

Pharmaceuticals and healthcare

Healthcare lobbying is unusually dense because price, reimbursement, intellectual property, approval, safety, insurance design and provider payment are divided among multiple institutions. Drug manufacturers must distinguish FDA regulatory science from CMS reimbursement, congressional patent and tax policy, and state-level substitution or coverage rules. Hospitals, physicians, insurers and patient groups may align on one provision and oppose one another on the next.[55]

The most durable campaigns combine technical evidence with coalition politics. Clinical, actuarial and budgetary arguments may matter at agencies and CBO-facing congressional offices, while constituent effects - local hospitals, research employment, pharmacy access or patient affordability - matter to elected officials. The ACA and Medicare drug-price cases in Part XXX illustrate why success cannot be inferred from spending: many powerful actors obtained concessions while still accepting legislation they would not have designed themselves.[56,57]

Healthcare is one of Washington’s densest influence markets because federal policy simultaneously affects product approval, reimbursement, insurance, patents, public-health regulation, provider payment and competition. Pharmaceutical firms therefore engage FDA, CMS/HHS, Congress, the Patent and Trademark Office, FTC and sometimes DOJ; hospitals and insurers have different institutional maps centered on CMS, HHS, Congress and competition authorities.

The sector also demonstrates coalition conflict. Drug manufacturers, PBMs, hospitals, physicians, insurers, employers and patient groups often disagree about who should bear cost reductions. A unified “healthcare lobby” therefore does not exist. Trade associations such as PhRMA, BIO, AHA, AHIP and professional societies aggregate some interests but cannot erase differences among member business models.

Strategic pattern: after a statute passes, lobbying often intensifies rather than ends. Medicare drug-price negotiation, reimbursement rules and payment models generate second-stage advocacy through comments, technical meetings, implementation guidance, litigation and legislative revision.

Defense, aerospace, and national security technology

Defense lobbying operates at the intersection of authorization, appropriations, acquisition, export controls and national-security policy. The policy map therefore includes the Armed Services and Appropriations committees, DOD acquisition organizations, military services, State Department export-control functions, Commerce controls and - in some cases - the White House and NSC. Technical performance, industrial-base capacity and geographic employment can all enter the argument, but procurement law and ethics constraints sharply limit what constitutes permissible advocacy.[58]

For emerging defense technology, the commercial challenge is often less “winning a bill” than obtaining a place in requirements, testing, procurement pathways and multiyear budget planning. That makes former acquisition, committee and program-management expertise valuable. The C-5B case remains useful as a boundary case because GAO documented improper government-funded lobbying activity, demonstrating that even policy advocacy aligned with an agency objective is constrained by law and appropriations rules.[59]

Defense lobbying operates through a distinctive combination of authorization, appropriations, procurement and export-control processes. The House and Senate Armed Services Committees, Appropriations defense subcommittees, DOD, military services, State, Commerce/BIS and national-security offices may all matter to a single program. For contractors, the issue is often not a broad ideological question but whether a technology fits a requirement, appears in budget documents, survives authorization and appropriation, and meets procurement rules.

The market rewards former staff and officials who understand committee calendars, acquisition categories, program elements and the distinction between authorizing language and actual funding. Technical validation can come from military users, local suppliers, universities, governors and members representing facilities or production sites.

Strategic pattern: legitimate advocacy must remain separate from prohibited use of appropriated funds for lobbying, procurement-integrity restrictions and other ethics rules. The historical C-5B episode is useful precisely because it shows that government-industry coordination can cross legal lines.

Technology and artificial intelligence

Technology lobbying now spans antitrust, privacy, cybersecurity, content governance, intellectual property, export controls, procurement, energy infrastructure and AI governance. The relevant decision centers therefore extend well beyond congressional technology committees to FTC, DOJ, Commerce, NIST, BIS, DOD, DOE, FCC, OMB and White House policy offices. Firms whose products cross those domains increasingly organize federal affairs by issue vertical rather than by a single “tech policy” portfolio.[60]

AI adds a pre-regulatory dimension: companies seek to shape definitions, standards and institutional jurisdiction before a stable statutory regime exists. Public filings and reporting through the cutoff show sharply rising engagement by leading AI developers. The analytical caution is important: higher lobbying outlays demonstrate organizational investment in representation, not that a particular company has captured or determined federal AI policy.[61,62]

Technology lobbying spans antitrust, privacy, cybersecurity, content policy, competition, taxes, procurement, export controls and infrastructure. AI adds model governance, compute, data centers, energy availability, chips, national security, liability, workforce policy and federal-versus-state preemption. No single committee or agency owns the entire field.

AI also creates an unusually early-stage lobbying market: companies are trying to shape the architecture while definitions, jurisdiction and risk categories remain unsettled. This favors firms that combine policy expertise with technical literacy, state-federal coordination and executive-branch reach. The same company may simultaneously advocate for federal preemption, export-control flexibility, procurement opportunities and infrastructure approvals.

Strategic pattern: emerging sectors spend not only to change rules but to define the vocabulary through which government understands the sector. Research papers, model standards, expert testimony and think-tank engagement can therefore be as important as formal lobbying contacts.

Telecommunications and digital infrastructure

Telecommunications is a classic example of venue-specific lobbying. Spectrum, licensing and common-carrier questions are concentrated at the FCC; broadband funding can involve NTIA and Commerce; competition issues can move through DOJ or FTC; national-security reviews can implicate other executive agencies. Congressional committees remain important for statutory authority, appropriations and oversight.[63]

Coalitional alignment is unstable. Network operators, equipment vendors, platforms, broadcasters, satellite providers and consumer advocates can share an objective on infrastructure investment while taking opposing positions on spectrum allocation, net neutrality, universal-service funding or merger review. Researchers should therefore avoid treating “telecom” as a unitary interest group.

Telecommunications lobbying is institutionally anchored in the FCC and NTIA but also extends to Congress, antitrust authorities, the Commerce Department and infrastructure agencies. Spectrum allocation, broadband funding, universal service, network security, competition, merger policy and rights-of-way can place carriers, cable companies, satellite firms, broadcasters and technology platforms on different sides.

Because many questions are technically dense and highly path-dependent, formal administrative records matter. Engineering evidence, economic models and legal interpretations may determine whether an argument survives agency review and litigation. Trade associations provide scale, while companies retain specialized counsel for spectrum, transaction and administrative-law issues.

Strategic pattern: regulatory venue selection is central. The same commercial conflict may be fought through FCC rulemaking, Congress, antitrust review and the courts at different stages.

Energy, oil and gas, renewables, utilities, and the grid

Energy influence is best analyzed as several overlapping regulatory systems. Oil and gas issues can involve Interior leasing, EPA emissions, FERC infrastructure and tax policy; electric utilities confront FERC, DOE, EPA and state regulators; renewable developers often focus on tax credits, transmission, permitting, procurement and interconnection. The same company can simultaneously lobby for a tax incentive, against a specific implementation rule and for faster permitting.[64]

Implementation frequently matters as much as enactment. The Inflation Reduction Act created multiyear administrative work at Treasury, IRS, DOE and other agencies, shifting advocacy from legislative coalition-building toward definitions, eligibility, credit transferability, domestic-content rules and technical guidance. This is precisely the kind of transition in which regulatory lawyers, engineers and tax specialists become central to a lobbying strategy.[65]

Energy lobbying is best understood as a portfolio of linked but distinct regulatory systems. Oil and gas issues can involve Interior, EPA, DOE, FERC, Treasury and Congress; renewable-energy issues often involve tax-credit implementation, permitting, transmission, domestic-content rules and trade; utilities focus heavily on reliability, rate structures, fuel supply and grid investment.

Coalition structures are especially important because companies can be simultaneously competitors and allies. A utility may support transmission reform while disagreeing with developers over interconnection rules. Manufacturers may support clean-energy credits but seek different domestic-content definitions. Labor can become a powerful partner when incentives are tied to prevailing wage or domestic production.

Strategic pattern: the enactment of a major energy statute creates a long implementation market. Treasury/IRS guidance, DOE programs, EPA rules, FERC proceedings and state implementation can materially alter the economics of the same legislative text.

Automotive, batteries, airlines, and transportation

Transportation policy mixes safety regulation, environmental standards, trade, tax incentives and industrial policy. Automakers can engage EPA and DOT on vehicle standards, Treasury and IRS on tax-credit implementation, Commerce and USTR on tariffs and supply chains, and Congress on appropriations and statutory design. Battery manufacturers add critical-mineral sourcing, manufacturing incentives and national-security supply-chain questions.[66]

Airlines present a different structure: FAA safety and airspace regulation, DOT consumer rules, competition policy, airport and infrastructure funding, and international aviation agreements. The common analytical lesson is that transportation lobbying is rarely a single “industry ask”; it is a portfolio of venue-specific objectives managed across different time horizons.

Transportation lobbying combines safety regulation, emissions, infrastructure, trade, tax incentives, labor, procurement and consumer policy. Automakers interact with EPA, DOT/NHTSA, Commerce, Treasury and Congress; battery manufacturers add DOE, trade and industrial-policy institutions; airlines engage FAA, DOT, Congress and competition authorities.

Global supply chains make trade and industrial policy unusually important. Rules of origin, tariffs, tax-credit eligibility, battery sourcing, export controls and local-content standards can be as important as conventional vehicle-safety regulation. The policy map therefore crosses domestic regulation and international economic policy.

Strategic pattern: plant location creates a geographic advocacy network. Companies can mobilize suppliers, workers, governors, local officials and universities as grasstops validators when federal policy affects investment or employment.

Agriculture and food

Agriculture combines recurring farm-bill coalitions with commodity, nutrition, conservation, crop-insurance, food-safety and trade interests. USDA and Congress are central, but FDA, EPA and USTR can be decisive depending on the issue. Producer groups, processors, retailers and consumer organizations may form temporary coalitions around one title of a bill and divide sharply on another.

Geography matters unusually strongly because production is concentrated in particular states and districts. Grasstops advocacy - farm organizations, cooperatives, local processors and rural employers - can therefore complement national trade-association lobbying. The political value of a coalition is not merely the number of organizations on a letter but the constituencies and jurisdictions those organizations represent.

Agriculture lobbying remains tied to the farm bill, commodity programs, crop insurance, nutrition, trade, biofuels, food safety and environmental regulation. USDA and Congress remain central, but EPA, FDA, USTR and Treasury can be decisive depending on the issue. Commodity organizations and producer associations often have unusually durable geographic networks because policy effects are concentrated in identifiable states and districts.

Food manufacturers and retailers face a different mix of labeling, safety, supply-chain and nutrition policy. The result is a layered ecosystem connecting farm groups, processors, retailers, consumer advocates and health organizations.

Strategic pattern: agriculture demonstrates the political importance of geographically concentrated constituencies. A relatively small economic sector can maintain significant institutional access when representation is organized through states, districts and longstanding committee relationships.

Real estate and housing finance

Real-estate lobbying spans taxation, mortgage finance, housing supply, flood insurance, environmental review and local land-use spillovers. At the federal level, relevant institutions can include HUD, FHFA, Treasury, banking regulators and tax-writing committees. Brokers, homebuilders, multifamily owners, mortgage lenders and affordable-housing organizations often share concern about credit availability while diverging on tax or regulatory design.[67]

Because many housing constraints originate outside Washington, federal lobbying frequently seeks financing, tax or regulatory levers rather than direct control of land use. Researchers should distinguish national association positions from the preferences of local members, whose business models and housing markets can vary substantially.

Federal real-estate advocacy spans mortgage finance, housing supply, tax, insurance, banking, environmental rules and federal property policy. HUD, FHFA, Treasury, banking regulators and Congress can all become relevant. The National Association of Realtors and other property associations illustrate the scale advantages available to membership organizations with broad local presence.

Commercial real estate adds banking exposure, tax treatment and capital-market regulation, while residential markets involve mortgage standards, GSE policy and housing affordability. This makes the sector a useful example of inside lobbying reinforced by local grasstops networks.

Strategic pattern: because many decisive land-use rules are state and local, federal lobbying is most effective when integrated with multilevel government affairs rather than treated as a Washington-only function.

Cryptocurrency and digital assets

Crypto lobbying illustrates a jurisdictional contest as much as a substantive policy dispute. Market-structure proposals can implicate SEC and CFTC authority, banking and stablecoin rules, Treasury illicit-finance policy, tax treatment and consumer protection. Firms therefore lobby not only over the content of rules but over which institution should write and enforce them.[68]

The September 2026 procedural defeat discussed in Part XXX is analytically important because it demonstrates the limits of a spending-centered explanation. Substantial lobbying and political spending can coexist with legislative failure when coalition design, chamber procedure, jurisdiction and policy disagreement remain unresolved.[69,70]

Crypto lobbying centers on market structure, stablecoins, securities-versus-commodities jurisdiction, custody, banking access, anti-money-laundering rules and tax. Congress, SEC, CFTC, Treasury and banking regulators therefore share overlapping authority. Industry participants also disagree among themselves over business models and preferred regulatory boundaries.

The sector shows both the potential and the limits of concentrated political spending. Large advocacy budgets can build visibility and access, but legislation still depends on coalition formation, committee procedure, chamber rules and agreement among institutions. The September 2026 Senate procedural defeat discussed in the case studies is a useful reminder that resources are not equivalent to votes.

Strategic pattern: emerging financial sectors often seek “regulatory clarity,” but clarity is not a single outcome; firms may prefer very different allocations of jurisdiction and compliance burdens.

Labor, media, and entertainment

Labor policy centers on collective bargaining, worker classification, wage-and-hour rules, workplace safety, pensions and benefits, and increasingly the employment effects of technology. Relevant institutions include DOL, NLRB, Congress and sector-specific agencies. Unions themselves are organized interests and participate in lobbying, coalition advocacy and campaign finance under legal regimes distinct from corporate government-affairs programs.

Media and entertainment add copyright, communications regulation, platform distribution, ownership, privacy, antitrust and generative-AI questions. Their influence strategies frequently integrate government relations with public communication because policy disputes are also narrative disputes about speech, creators, competition, local journalism or cultural production.

Labor organizations lobby as membership-based interests on collective bargaining, workplace standards, pensions, immigration and sector-specific regulation. Their institutional targets include Congress, DOL, NLRB and relevant agencies. Labor influence also operates through electoral participation and workplace-based grassroots networks, which makes it analytically different from purely corporate advocacy.

Media and entertainment interests engage copyright, communications regulation, platform policy, artificial intelligence, labor, spectrum and competition. The Copyright Office, FCC, Congress and antitrust institutions can become central depending on the issue. Creators, studios, publishers, platforms and unions frequently have conflicting objectives.

Strategic pattern: these sectors illustrate how public narrative and direct lobbying interact. Earned media may influence the political environment, but formal policy still turns on statutory text, agency authority, administrative records and institutional jurisdiction.[71]

PART XVIII. TRADE ASSOCIATIONS

Trade associations solve a collective-action problem: companies with common policy interests can pool research, staff, communications, and political representation. Examples include the U.S. Chamber of Commerce, Business Roundtable, American Bankers Association, Pharmaceutical Research and Manufacturers of America, National Association of Realtors, and Semiconductor Industry Association.

Advantages include scale, technical expertise, sector-wide data, coalition legitimacy, and the ability to represent shared positions. Disadvantages include internal conflict among members and lowest-common-denominator policy positions. Individual corporate lobbying is therefore usually complementary to, not replaced by, trade-association lobbying.

Corporate lobbying and association lobbying are complementary

An individual company can advance proprietary concerns, negotiate company-specific implementation questions, and move quickly when its commercial exposure is unique. A trade association can pool data, spread cost, coordinate a sector-wide position, and demonstrate that an issue is broader than one corporate balance sheet. The tradeoff is that association positions often reflect internal consensus and therefore may be less specific than an individual member would prefer.

Large firms therefore often use a dual-track model: the association carries the shared industry argument while the company maintains its own Government Affairs program for differentiated priorities, confidential matters, implementation details, and relationships that cannot be delegated to a collective body.

PART XIX. COALITION LOBBYING

Coalitions can change how a policy request is perceived. A single corporation speaks for itself; a coalition of manufacturers, suppliers, universities, workers, local governments, investors, and national-security organizations can present the same issue as affecting multiple constituencies and policy domains.

- Coalitions are useful when many organizations share one objective.
- They spread cost across participants.
- They demonstrate geographic or sector breadth.
- They can provide multiple types of expertise and political validation.
- They can obscure differences among members, so governance and message discipline matter.

The term front group should be used carefully. It is generally a critical label for an ostensibly independent organization whose material sponsorship or control is obscured. A responsible analysis should establish funding, governance, and operational facts rather than infer a front group solely from ideological alignment.

PART XX. GRASSROOTS AND GRASSTOPS LOBBYING

Inside lobbying involves direct engagement with Members, staff, executive officials, and regulators. Outside lobbying seeks to alter the political environment through constituent mobilization, advertising, media, civil-society participation, and digital campaigns.

Grasstops lobbying mobilizes locally influential participants - large employers, university presidents, civic leaders, physicians, elected local officials, business owners, or respected community organizations - whose views may carry special constituency relevance. Grassroots emphasizes scale; grasstops emphasizes local credibility and influence.

When outside pressure adds value

Outside lobbying is most useful when policymakers care about constituency intensity, geographic distribution, local economic effects, or public legitimacy. A high-volume campaign can demonstrate breadth, while a grasstops campaign can demonstrate local credibility through employers, civic leaders, subject-matter experts, local officials, or institutions with a direct stake in implementation.

Quality control matters. Policymakers and staff distinguish authentic constituent engagement from scripted volume, and disclosure or reputational risks can arise when sponsorship is obscured. The strategic objective should therefore be credible participation and relevant evidence, not merely the largest possible number of contacts.

PART XXI. MEDIA AND LOBBYING

Modern influence campaigns can integrate policy research, direct lobbying, earned media, paid media, digital campaigns, expert commentary, conferences, op-eds, and third-party stakeholder voices. The objective is not necessarily to create mass public attention; it may be to shape the information environment surrounding a relatively small number of policymakers.

Integrated communications logic

Research -> message -> Hill / agency outreach + earned media + paid media + digital stakeholder communication -> policy environment. The same substantive argument may be adapted for technical staff, senior officials, investors, journalists, and constituents.

Integrated influence architecture

A disciplined campaign separates evidence, message, messenger, channel, audience, and feedback. Technical evidence may be carried directly to agency staff; a trade-association leader may address an industry-wide concern; a local employer may explain district effects; and earned or paid media may shape the context in which those arguments are received. The same core position should be translated for each audience without changing the underlying factual claim.

Media visibility is not itself evidence of policy influence. It can create agenda attention, signal constituency intensity, recruit coalition partners, or increase reputational costs, but causal assessment still requires tracing how the information entered the governmental decision process.

PART XXII. THINK TANKS AND POLICY NETWORKS

Think tanks are not conventional lobbying firms, but they are important producers, validators, and distributors of policy ideas. A common pathway is research -> policy framework -> media discussion -> congressional or agency staff -> legislation, regulation, or executive action.

Transparency questions include who funded the work, whether donor relationships are disclosed, whether a sponsor exercised editorial control, whether conflicts are disclosed, and whether research methods are reproducible. Funding is not itself proof that a conclusion was purchased; it is a potential conflict that should be examined rather than presumed.

Influence through ideas rather than direct representation

Think tanks can matter by defining problems, supplying policy frameworks, convening expert networks, and giving staff or journalists a vocabulary for interpreting new issues. This is a different mechanism from a registered lobbyist asking an official to adopt a client position. The influence pathway is often agenda setting, expert validation, or diffusion of policy concepts through networks.

A useful transparency framework asks four questions: who financed the institution or project; whether the relevant funding was disclosed; whether a sponsor had governance or editorial control; and whether the underlying analysis can be independently evaluated. Those questions help distinguish legitimate research support from stronger claims about donor control that require evidence.

PART XXIII. THE LOBBYING INDUSTRY AND LAW FIRMS

Major law firms maintain Government Relations and public-policy practices because many high-stakes corporate problems combine legal, regulatory, legislative, investigatory, and communications dimensions. A pharmaceutical company can simultaneously require FDA counsel, congressional advocacy, litigation capability, internal-investigation advice, and crisis communications.

- Legal advice: interpretation of statutes, regulations, contracts, privileges, and litigation risk.
- Regulatory law: rulemaking, enforcement, administrative procedure, licensing, compliance.
- Legislative lobbying: statutory change, appropriations, oversight, nominations.
- Government investigations: congressional and agency inquiries.
- Litigation: judicial review and enforcement disputes.
- Political strategy: how legal and policy actions interact with institutional and reputational risks.

Big Law and lobbying boutiques compete for government-relations mandates but also cooperate, particularly when a client needs separate specialized regulatory counsel and political advocates or when ethics and privilege concerns warrant different engagement structures.

PART XXIV. LOBBYING, CONSULTING, AND PR

Industry	Typical clients	Principal services	Revenue model
Lobbying	Corporations, associations, NGOs, governments	Legislative/regulatory representation, policy strategy	Retainer/project
Law	Corporations, institutions, individuals	Legal advice, litigation, investigations, regulatory law	Hourly/matter/retainer
Management Consulting	Corporations and public-sector organizations	Strategy, operations, transformation	Project/retainer
Political Consulting	Candidates, parties, advocacy organizations	Electoral strategy, polling, media, targeting	Campaign/project
Public Relations	Corporations, institutions, public figures	Media relations, reputation, crisis communications	Retainer/project
Strategic Communications	High-stakes organizations	Narrative, stakeholder, policy communications	Retainer/project
Political Intelligence	Investors and corporations	Policy information and event-driven analysis	Subscription/advisory

The boundaries are increasingly porous because clients often face one problem that manifests simultaneously as a regulatory, legal, political, investor, and reputation issue. Integrated firms seek to capture more of that client spend; specialist boutiques compete by offering depth and senior attention.

PART XXV. POLITICAL INTELLIGENCE

Political intelligence is commercially relevant information and analysis concerning governmental policy, legislative developments, regulatory decisions, enforcement, procurement, sanctions, trade, and other state actions. Hedge funds, asset managers, investment banks, private-equity firms, and corporate strategy teams may use such information to assess risk and opportunity.

The lawful business is not synonymous with insider trading. The legal concern arises when information is material and nonpublic and is obtained or used under circumstances that satisfy the elements of securities-law violations. The SEC's 2015 Marwood Group matter illustrates the compliance risk created when analysts obtain potentially material nonpublic governmental information; the firm paid a $375,000 penalty and agreed to compliance reforms.[72]

Boundary

Public-policy analysis is lawful. Sophisticated research using government sources can be lawful. Trading on unlawfully obtained material nonpublic information can create securities-law liability.

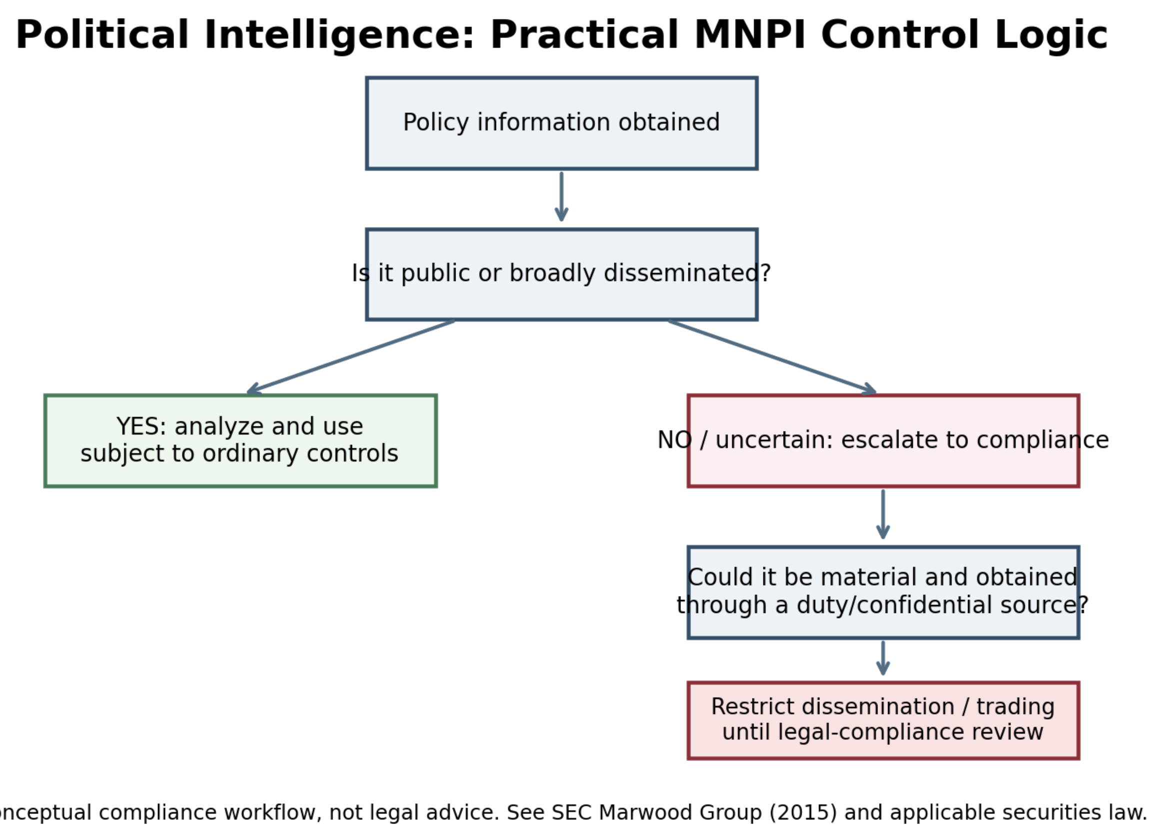


Figure 9. Conceptual compliance workflow for political intelligence and potential material nonpublic information.

Investor workflow: from Washington event to investment thesis

Step	Typical question	Control
1. Policy event detection	What bill, rule, enforcement action or procurement change could affect value?	Use public records and clearly sourced research
2. Institutional probability tree	Which committee, agency or court controls the next step?	Separate known procedural facts from scenario judgment
3. Economic transmission	How would the policy change revenue, cost, capital, approval timing or competitive position?	Build sensitivity ranges rather than one-point political forecasts
4. Source classification	Is the information public, inferential, confidential, or potentially MNPI?	Escalate uncertain information to compliance
5. Trade / corporate decision	Is the thesis based on lawful research and documented assumptions?	Pre-clear where required; preserve source records
6. Post-event review	Did policy drive the observed market move?	Test alternative drivers; avoid hindsight causation.

The Marwood matter shows that political research itself is not unlawful; the SEC focused on failures to escalate and control potentially material nonpublic information obtained from government employees. For investors and political-intelligence firms, the operational lesson is to maintain an explicit compliance gate between source collection and dissemination or trading.

PART XXVI. FOREIGN GOVERNMENTS, FOREIGN PRINCIPALS, AND FARA

FARA, enacted in 1938, requires covered agents of foreign principals engaged in specified political and representational activities to disclose relationships, activities, receipts, expenditures, and informational materials. It is administered by the Department of Justice rather than Congress.

Feature	LDA	FARA
Main concern	Domestic federal lobbying disclosure	Transparency regarding foreign-principal representation
Administrator	Congressional disclosure system	Department of Justice
Trigger	Statutory lobbying tests and thresholds	Agency relationship plus covered activity
Foreign governments	Not the central framework	Core FARA concern
Public communications	Narrower connection to lobbying	Can be covered political activity
Disclosure intensity	Substantial but standardized quarterly/semiannual reports	Potentially broader and more detailed filings

FARA's LDA exemption does not generally shield representation where a foreign government or foreign political party is the principal beneficiary. Covered registration can require prompt filing after the agency relationship arises. Foreign governments, foreign political parties, corporations, state-owned enterprises, and other foreign principals therefore require careful classification rather than assuming all Washington representation is ordinary LDA lobbying.[73]

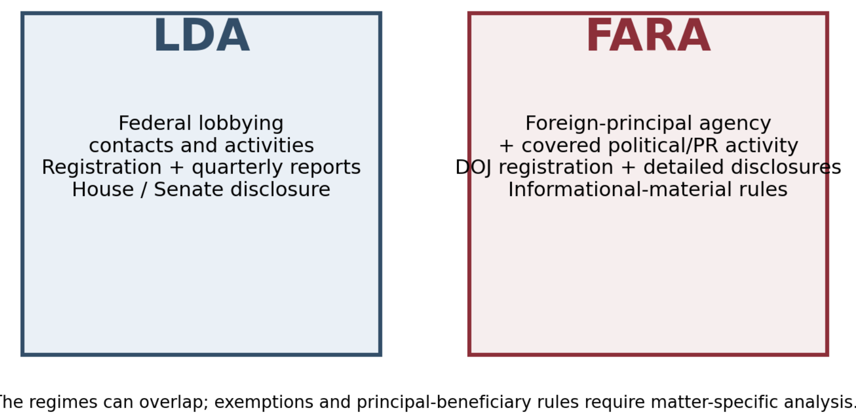


Figure 10. LDA and FARA are distinct disclosure regimes and can overlap depending on the principal and activity.

FARA operational checklist

1. Identify the foreign principal and every entity in the agency/control chain.
2. Determine whether the U.S. actor is acting at the order, request, direction, or control of the foreign principal under the statute and regulations.
3. Identify the activity: political activity, public-relations counsel, political consulting, fundraising/disbursement, or representation before U.S. government actors.
4. Analyze exemptions carefully, especially the LDA exemption and matters where a foreign government or political party is the principal beneficiary.
5. If registration is required, file within the applicable deadline and maintain systems for supplemental statements, receipts/disbursements, contracts, contacts and informational materials.
6. Run LDA, FARA, campaign-finance, sanctions, export-control and ethics analyses separately when an engagement spans multiple regimes.

DOJ states that a covered person generally must register within ten days of becoming an agent of a foreign principal. FARA is a transparency regime, not government approval and not a substitute for compliance with bribery, sanctions, campaign-finance, or other applicable laws.

PART XXVII. WASHINGTON LOBBYING FROM THE SOUTH KOREAN PERSPECTIVE

South Korea provides a useful case because its Washington presence combines embassy diplomacy, FARA representation, corporate LDA lobbying, public institutions, trade associations, and state-level economic development. These should not be collapsed into one spending number.

In February 2026, the Republic of Korea Ministry of Foreign Affairs stated that official FARA records showed approximately $3 million in 2025 government budget for retaining U.S. consulting firms, while clarifying that a larger reported $37 million figure included approximately $34 million in operating budgets of Korean public institutions such as KOTRA rather than lobbying-firm retainers.[74]

DOJ FARA records have documented U.S. firms representing South Korean governmental entities on trade, government-relations, and visa issues. Corporate lobbying is separate: Samsung Electronics America filings have identified CHIPS Act implementation, semiconductor incentives, supply chains, trade policy, spectrum, privacy, AI, procurement, and defense-authorization issues, with contacts involving Congress, Commerce, USTR, and the Executive Office of the President.[75]

Illustrative U.S. Government Affairs architecture for a major Korean corporation

- Korean headquarters sets global corporate strategy but should avoid informal direction that creates unexamined registration risk.
- U.S. subsidiary CEO and Chief Government Affairs Officer own U.S. federal priorities.
- Dedicated legislative, regulatory, state/local, trade/industrial-policy, and political-compliance functions provide internal ownership.
- Outside support can include a bipartisan lobbying firm, regulatory law firm, trade associations, public affairs specialists, and issue-specific boutiques.
- FARA and LDA classification should be reviewed separately for each engagement and principal.

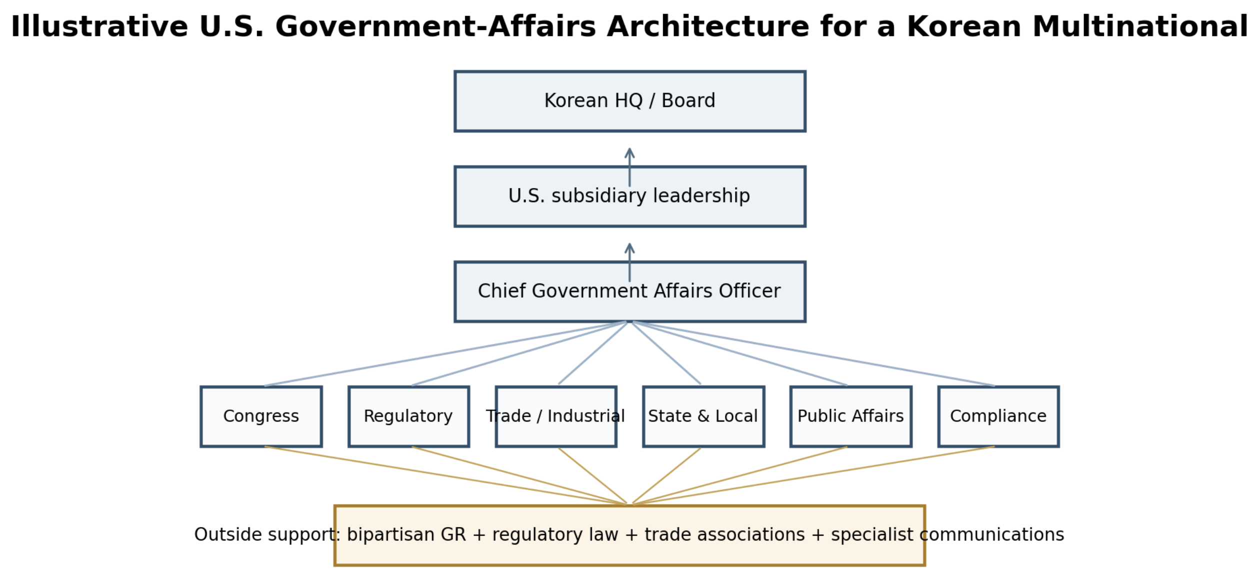


Figure 11. Illustrative U.S. government-affairs architecture for a Korean multinational.

Expanded Korean-government and corporate presence

South Korea illustrates why analysts must separate sovereign representation from corporate lobbying. In February 2026, the Republic of Korea Ministry of Foreign Affairs stated that official FARA records showed roughly $3 million in 2025 government budget used to retain U.S. consulting firms; it said a much larger figure circulating publicly included operating budgets of Korean public institutions such as KOTRA rather than payments to lobbying firms. DOJ FARA records for 2024 documented U.S. firms acting for Korean governmental entities on trade, investment, strategic counsel and a professional-visa initiative.[76, 77]

Corporate lobbying belongs in a different data system. Samsung Electronics America LDA filings have covered CHIPS Act implementation, semiconductor incentives, supply chains, technology, spectrum, privacy, AI, procurement and National Defense Authorization Act issues, with contacts reported across Congress, Commerce, USTR and the Executive Office of the President. SK Americas reported $1.56 million of in-house lobbying expense for Q2 2026 and identifies a U.S. business footprint spanning semiconductors, energy and life sciences. Public filings for LG entities address batteries, energy storage, advanced manufacturing, critical minerals, AI and connected vehicles. Hanwha Aerospace filings include shipbuilding, defense authorization/appropriations, trade and energy infrastructure issues. [78]

Korean stakeholder	Representative U.S. policy exposure	Illustrative federal interface
ROK Embassy / ministries	Alliance, trade, visas, industrial and economic policy	State, White House, Congress, Commerce, USTR; FARA-registered U.S. advisers where applicable
Samsung	Semiconductors, telecom, AI, privacy, procurement, CHIPS	Commerce, Congress, USTR, EOP, DOD
Hyundai / Kia	Autos, EVs, trade, tax credits, labor/workforce, safety	Commerce, Treasury, EPA, DOT, Congress
SK	Semiconductors, batteries/energy, biopharma	Commerce, DOE, Treasury, Congress, White House
LG	Batteries, energy storage, manufacturing, critical minerals, electronics	DOE, Commerce, Treasury, EPA, Congress
Hanwha	Defense, shipbuilding, energy, trade	DOD, Navy, Congress, Commerce, State, USTR
Korean-American organizations	Community representation, visas, small business, civic issues	Congressional offices, agencies, state/local networks

A practical U.S. Government Affairs build-out for a Korean corporation

The operating principle should be U.S.-institution first, not Seoul-status first. A corporate headquarters may think in terms of ministries and senior executives; Washington decisions are often controlled by committee staff, career agency officials, rulemaking dockets, OMB review, appropriations subcommittees, or specialized offices. The U.S. subsidiary therefore needs an empowered chief government-affairs officer who can translate corporate strategy into American institutional language.

1. Create a U.S. policy inventory: revenue, capex, supply chain, tax credits, export controls, procurement, immigration, labor, environmental and data issues.
2. Assign each risk to actual federal jurisdiction - committee, agency, office, docket and procedural stage.
3. Build an in-house team that owns positions and long-term relationships; do not outsource corporate judgment.
4. Retain external firms only for defined gaps: committee reach, administration reach, regulatory law, state implementation, crisis capacity or communications.
5. Use trade associations for common industry positions while preserving direct corporate advocacy for company-specific issues.
6. Establish FARA/LDA analysis at engagement intake, especially where personnel in Korea direct U.S. activity.
7. Develop geographically relevant grasstops validators: U.S. plant workers, suppliers, governors, universities, community colleges, local economic-development actors.
8. Measure outputs and process milestones, not just meetings: draft changes, docket participation, coalition support, implementation clarity, avoided costs and time-to-decision.

Company-level illustrations from current public filings

Samsung Electronics America

A 2026 LD-2 filing identifies Samsung Electronics America as a wholly owned subsidiary of Samsung Electronics Co., Ltd. and reports advocacy concerning U.S. investment by foreign-held companies, CHIPS and Science Act implementation, FY2026 defense authorization, government procurement and related issues. The filing identifies Congress, the Department of Commerce, the Executive Office of the President and USTR among contacted institutions. The analytical point is not that Samsung has one “lobbying target,” but that semiconductor policy crosses industrial policy, trade, procurement and national-security institutions.[79]

SK Americas and affiliated Korean companies

Current LDA records show SK Americas operating as an in-house federal registrant with interests spanning SK Innovation, SK hynix and other affiliated entities. A 2026 filing reports semiconductor policy and artificial-intelligence issues and identifies Congress, Commerce, BIS, NIST, the National Security Council, OSTP, the International Trade Administration and State among relevant institutions. A Q2 2026 search result reports $1.56 million in organizational lobbying expense for SK Americas. This is a useful example of a Korean conglomerate building a broad U.S. policy function rather than relying only on outside firms.[80]

LG companies

A 2026 filing for LG Electronics USA reports activity relating to the FY2026 National Defense Authorization Act and tariffs and discloses LG Electronics, Inc. as the foreign parent. Separate public filings also show engagements involving LG Energy Solution. For Korean battery and electronics groups, the practical Washington agenda can span trade, industrial policy, tax incentives, defense-related technology, supply chains and workforce policy.[81]

Hanwha

Hanwha Aerospace filed as an in-house federal registrant in 2026. Its first-quarter report disclosed approximately $1.42 million in lobbying expense and listed issues involving shipbuilding, army ground systems, strategic missiles, defense authorization and appropriations, commercial shipbuilding, shipping and natural-gas infrastructure. The filing identified Congress as well as DOD, State, Commerce, Treasury, USTR, DHS and the Executive Office of the President depending on issue area. This is a clear illustration of how a Korean defense/industrial group can require simultaneous congressional, procurement, trade and executive-branch engagement.[82]

Hyundai/Kia and the battery-manufacturing ecosystem

Automotive and battery manufacturers with Korean ownership face a policy stack that can include emissions, safety, EV incentives, tariffs, rules of origin, battery sourcing, immigration/workforce questions and state economic-development commitments. Public LDA registrations confirm federal representation for Kia America. For analytical purposes, the critical point is that federal advocacy should be coordinated with state plant politics, supplier networks and local workforce institutions rather than treated as a standalone Washington activity.[83]

Korean-American organizations and community networks

Korean-American organizations can play a different role from corporate or sovereign lobbyists. Their potential value is constituency representation, local credibility, professional networks and issue-specific grassroots or grasstops mobilization. A responsible strategy should distinguish community advocacy from corporate representation and should avoid implying that ethnic identity itself constitutes a unified policy position.

PART XXVIII. LAWS GOVERNING LOBBYING

Framework	Principal function
Lobbying Disclosure Act	Registration and disclosure of federal lobbying contacts and activities.
Honest Leadership and Open Government Act	Expanded reporting, contribution disclosure, ethics, and revolving-door provisions.
Foreign Agents Registration Act	Transparency for covered representation of foreign principals.
Federal Election Campaign Act	Campaign-finance contribution and expenditure framework.
18 U.S.C. 201	Federal bribery and illegal gratuity provisions.
18 U.S.C. 207	Post-employment representational restrictions for former executive and legislative personnel.
House / Senate ethics rules	Gifts, travel, employment negotiations, post-employment contacts, official conduct.
Executive-branch ethics rules	Conflicts, gifts, impartiality, post-employment restrictions, ethics pledges where applicable.
Securities law / STOCK Act context	Potential issues involving material nonpublic government information and trading.

The LDA states a transparency rationale: representative government requires public awareness of paid efforts to influence federal decisions. Registered lobbyists and covered organizations also face LD-203 semiannual contribution-related reporting requirements concerning specified political contributions and certain payments connected to covered officials.[84]

PART XXIX. HOW TO READ LOBBYING DATA

Database / record	What it can tell the researcher
Senate/House LDA database	Who hired whom, reported income/expenses, issues, lobbyists, agencies contacted, covered positions.
FARA database	Foreign principals, agency relationships, contracts, political activities, receipts/disbursements, informational materials.
OpenSecrets	Normalized and categorized lobbying and campaign-finance research.
FEC database	Contributions, PACs, committees, independent expenditures.
SEC filings	Corporate descriptions of policy exposure, risk, public-affairs businesses, and sometimes third-party data.
Congress.gov / Congressional Record	Bill text, actions, sponsors, amendments, debates, committee material.
Federal Register	Proposed and final rules, notices, executive documents.
Regulations.gov	Rulemaking dockets, comments, supporting materials.

How to read an LD-2

1. Identify the registrant - the firm or organization filing.
2. Identify the client - who is paying or represented.
3. Read reported income or expense amount, recognizing rounding and reporting conventions.
4. Review issue codes, then read the specific-issues narrative for actual bills, rules, or topics.
5. Identify houses of Congress, offices, agencies, or executive entities contacted.
6. Review named lobbyists and disclosed covered prior federal positions.
7. Review foreign-entity or foreign-interest disclosures where applicable.
8. Compare across quarters and cross-check related FEC, FARA, Federal Register, SEC, and congressional records.

An LD-2 generally does not prove which meeting occurred, what was said, whether an official agreed, how the reported dollars were allocated among individual issues, or whether lobbying caused a policy outcome. This limitation is central to rigorous lobbying research.

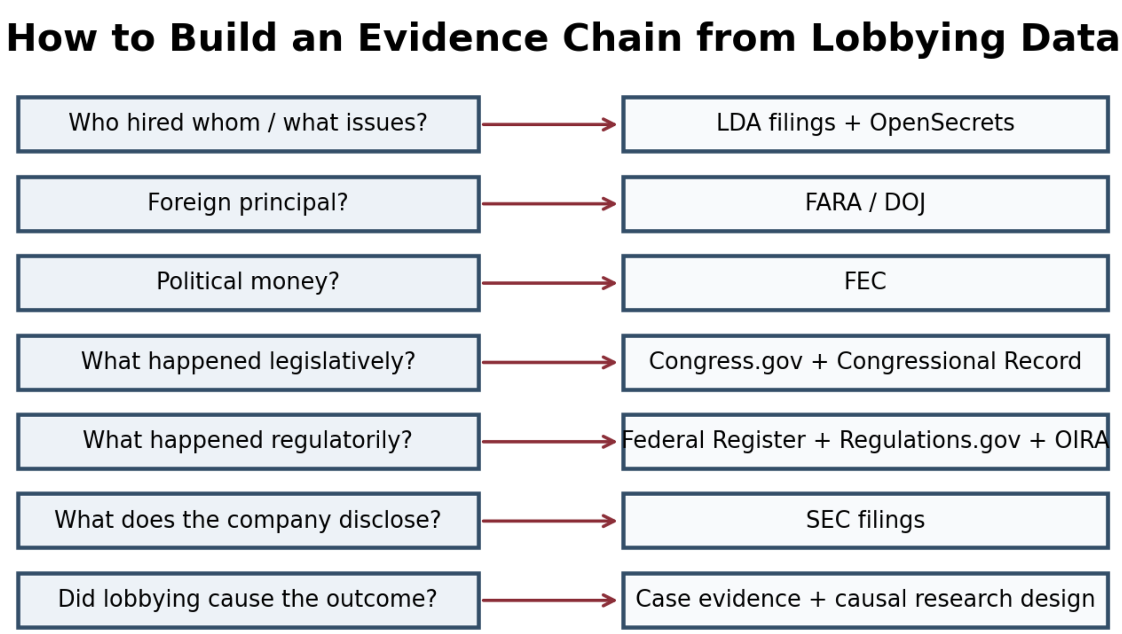


Figure 12. Evidence chain for reconstructing a lobbying campaign.

Worked method: reconstructing one LDA relationship

A rigorous researcher begins with the registrant-client pair, not with a news story. Step one is to retrieve the LD-1 registration and every relevant LD-2 quarterly report. Step two is to normalize client names across amendments and corporate reorganizations. Step three is to record lobbying income or expense, issue codes, specific issues, chambers/agencies contacted, lobbyist names and covered former positions. Step four is to match the reported issues against Congress.gov, committee calendars, Federal Register notices, agency guidance and public comments. Step five is to identify campaign-finance records separately in FEC data. Step six is to search media and corporate disclosures for strategy context. Only after this chain is assembled should the researcher discuss effectiveness.

Why LDA data cannot prove causation

Disclosure quality and compliance: what researchers should assume

Current federal disclosure is highly useful but not error-free. GAO's 2026 annual review generalized from samples of 71,497 quarterly reports with at least $5,000 in lobbying activity and 35,735 contribution reports. GAO estimated that 94% of sampled quarterly filers had documentation supporting reported income/expenses, 84% of filers reporting Senate lobbying had documentation supporting the lobbying activities, and 93% of sampled LD-203 reports included all reportable political contributions.

At the same time, GAO found that 22% of reviewed quarterly reports listed lobbyists who did not fully disclose relevant prior federal employment. GAO also reported that Congress referred 12,391 cases to DOJ for failure to file from 2016 through 2025, with about 46% resolved as of December 2025. Researchers should therefore treat LDA data as the best systematic public federal source while still cross-checking amendments, registration histories, prior positions and related records.[85]

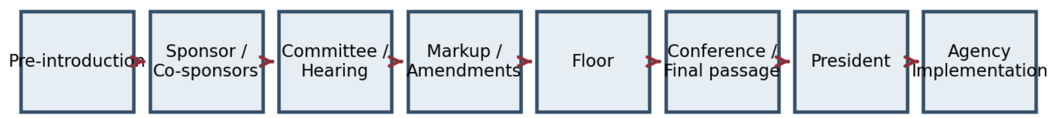
An LD-2 can show that a firm reported lobbying a particular institution on a particular issue during a quarter. It generally cannot show the content of a meeting, which official was persuaded, how much of the retainer was allocated to one issue, or whether a policy change would have occurred without the lobbying. The correct evidentiary language is therefore "the filing shows that the client reported lobbying on..." rather than "the client paid X to obtain outcome Y."

PART XXX. CASE STUDIES OF REAL LOBBYING CAMPAIGNS

Case	Key actors	Objective	Targets	Research lesson
Affordable Care Act, 2009-10	Healthcare interests	Coverage, payment, insurance, pharmaceutical provisions	Congress, White House, HHS	ACA enacted; lobbying was massive but causal attribution must be issue-specific.
Pharmaceutical ACA negotiations	PhRMA and manufacturers	Shape reform and financial commitments	Senate/White House/Congress	Illustrates negotiated lobbying rather than pure opposition.
Dodd-Frank	Banks, financial firms, consumer groups	Financial regulation	Congress, Treasury, regulators	Dodd-Frank enacted despite very large financial-sector lobbying.
Big Tech antitrust, 2021-22	Large technology firms and critics	Antitrust legislation	Congress, DOJ/FTC policy environment	Major proposals advanced but did not become law in that Congress.
AI policy, 2025-26	AI laboratories and technology companies	Safety, infrastructure, export controls, liability, procurement	White House, Commerce, Congress, DOD	Rapid institution-building before a mature federal regulatory regime.
Cryptocurrency market structure, 2026	Crypto firms and trade groups	Federal market-structure legislation	Senate, House, SEC/CFTC policy environment	A major Senate procedural vote failed 49-50 on Sept. 16, 2026, illustrating limits of political spending.
CHIPS Act	Semiconductor industry and related coalitions	Manufacturing incentives, R&D, supply chains	Congress, Commerce, White House	Legislation enacted; lobbying then shifted toward implementation.
Inflation Reduction Act	Energy, healthcare, tax, labor, advocacy groups	Tax, climate, healthcare provisions	Congress, Treasury, DOE, CMS	Enactment followed by extensive implementation lobbying.
Medicare drug-price negotiation	Drug manufacturers and healthcare stakeholders	Implementation and scope of negotiation	CMS/HHS, Congress, courts	Illustrates legislation -> rule/guidance -> litigation/policy-revision sequence.
Net neutrality	Telecom and internet companies, public-interest groups	Broadband classification and network rules	FCC, Congress	Competing coalitions show that one industry can contain opposing interests.
Defense procurement / C-5B	Defense contractor and government actors	Procurement support	Congress, Air Force	GAO found impermissible government-funded lobbying activity, illustrating legal boundaries.
South Korean representation	ROK government entities and U.S. advisers	Trade, government relations, professional visas	Congress, executive branch	Illustrates FARA-governed foreign representation distinct from ordinary corporate LDA lobbying.

These cases should be treated as process reconstructions rather than simple demonstrations that lobbying caused a result. A responsible causal analysis must identify the counterfactual, competing interests, institutional constraints, and timing.[86]

Where lobbying opportunities move as legislation moves



Earlier intervention often changes the set of feasible options; late-stage advocacy often becomes defensive or procedural.

Figure 13. Lobbying opportunities shift as a bill moves through the legislative process.

Expanded case studies: reconstructing campaigns rather than counting dollars

Common causal-method framework. All case studies apply the same counterfactual discipline drawn from Baumgartner et al. (2009), Hojnacki et al. (2012), and Bombardini & Trebbi (2020): spending, contacts, favorable language, and temporal sequence establish activity or access, but do not by themselves establish causal policy influence.

Case 1 - Affordable Care Act, 2009-2010

Institutional pathway: industry associations, firms and advocacy organizations worked simultaneously through congressional committees, leadership negotiations, executive-branch policy development and public messaging. The multiplicity of actors means the “health industry” cannot be treated as one coalition.[87]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Clients / interests: insurers, pharmaceutical manufacturers, hospitals, physicians, employers, unions and public-interest groups had overlapping but often conflicting objectives. Objective: shape coverage expansion, payment, insurance rules, taxes and industry obligations. Institutions: White House, House and Senate leadership, Finance, HELP, Ways and Means, Energy and Commerce, CMS/HHS. Strategy: direct lobbying, technical drafting, coalition negotiation, public advertising and use of former officials/staff. Cost evidence: Washington Post reported healthcare organizations spent more than $126 million in Q1 2009 and identified more than 350 former government officials working for health interests. Outcome: ACA enacted. Causal assessment: high lobbying intensity is verified; attributing specific statutory provisions to spending alone is not. The episode is best understood as negotiated multi-sided lobbying under a narrow legislative coalition.

Mechanism. The ACA illustrates multi-venue bargaining. Interest groups did not merely lobby for or against one bill; they negotiated payment levels, coverage rules, taxes, mandates and implementation details through multiple committees and the executive branch. Organizations could simultaneously support the broad objective and oppose specific provisions.

Evidence and counterfactual. Large spending and dense former-official networks establish intensive participation, not causation. A counterfactual analysis must ask which provisions were already necessary to assemble a governing coalition, which changes reflected budget constraints, and whether a different configuration of organized interests would have produced materially different statutory text.

Case 2 - Pharmaceutical bargaining during the ACA

Institutional pathway: negotiation involved the pharmaceutical industry, Senate and White House actors, budget constraints and other health-sector coalitions. The useful outcome variable is not simply passage but which provisions were included, excluded, delayed or later implemented.[88]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Objective: manage the pharmaceutical industry exposure to health reform while preserving key commercial interests. Strategy: negotiation with policymakers, support for a defined contribution to financing, advertising and legislative advocacy. Public reporting documented an approximately $80 billion industry contribution framework. Outcome: the industry supported the final reform more than many other business interests. Causal assessment: this is an example of bargaining and agenda shaping, not simply opposition lobbying.

Mechanism. Pharmaceutical engagement demonstrates exchange through policy bargaining rather than an illegal quid pro quo. The industry accepted specified financial contributions and supported reform while seeking to protect other commercial interests. This resembles coalition management and negotiated burden sharing more than simple persuasion.

Evidence and counterfactual. The public record documents the bargaining framework, but assigning a dollar value to the influence obtained requires assumptions about what lawmakers would otherwise have enacted. The case therefore supports process tracing more strongly than causal estimation.

Case 3 - Dodd-Frank financial reform, 2009-2010

Institutional pathway: lobbying occurred across congressional banking committees, leadership, Treasury and the subsequent rulemaking process. Enactment did not end the campaign; implementation created years of agency-specific advocacy over definitions, capital, derivatives and market structure.[89]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Clients / interests: banks, securities firms, insurers, consumer groups and other financial actors. Objective: shape systemic-risk regulation, derivatives, consumer protection, capital-market rules and institutional structure. Cost evidence: Washington Post reported more than 2,500 registered lobbyists representing finance, insurance and real-estate interests and sharply increased spending by major banks. Outcome: Dodd-Frank enacted. Causal assessment: major industry spending did not prevent enactment; influence questions must be examined provision by provision and during subsequent rulemaking.

Mechanism. Financial institutions fought over systemic-risk structure, derivatives, consumer protection, capital-market rules and implementation. Lobbying operated through both legislative text and later regulatory rulemaking, creating multiple opportunities to narrow, delay or reinterpret provisions even after enactment.

Evidence and counterfactual. The fact that the law passed despite extraordinary industry activity demonstrates why expenditure cannot be read as control. A stronger design compares specific amendments, agency rules and transition provisions against baseline drafts and identifies which actors supplied the decisive information or coalition support.

Case 4 - Big Tech antitrust legislation, 2021-2022

Institutional pathway: technology companies, competitors, consumer groups and lawmakers contested both substantive obligations and the procedural route to floor consideration. Failure to enact a particular bill cannot be attributed to lobbying expenditure alone because agenda control and coalition disagreement were independent constraints.[90]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Interests: major technology platforms and competing businesses/advocacy groups. Objective: support, narrow or stop platform antitrust bills. Cost evidence: seven large technology companies spent nearly $70 million on federal lobbying in 2021; public campaigns and executive outreach intensified as bills advanced. Outcome: major proposals advanced through committees but did not become law in that Congress. Causal assessment: lobbying is a plausible contributing factor but cannot be isolated from leadership scheduling, jurisdictional disputes, partisan conflict and competing legislative priorities.

Mechanism. Large platforms combined direct lobbying with communications, coalition building and arguments concerning consumers, innovation, national security and small businesses. Opponents and competitors used parallel channels. Committee passage therefore represented only one stage in a wider agenda-setting and floor-scheduling contest.

Evidence and counterfactual. Failure of major bills to become law is consistent with many causal stories: lobbying pressure, limited floor time, intra-party disagreement, other legislative priorities and substantive concerns. The episode is best used to show the difficulty of inferring causal influence from observed spending.

Case 5 - CHIPS and Science Act, 2021-2022

Institutional pathway: semiconductor firms and associations linked industrial capacity, research, supply-chain resilience and national security. After enactment, the influence problem shifted toward Commerce implementation, grant criteria, tax provisions and related export-control policy.[91]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Clients / coalition: semiconductor manufacturers, equipment/material suppliers, trade associations, state/local economic-development interests and national-security constituencies. Objective: subsidies, research funding and investment tax incentives for domestic semiconductor capacity. Outcome: the enacted law provided roughly $52 billion for semiconductor programs plus a 25% investment tax credit for qualifying facilities/equipment. Strategy: coalition framing combined supply-chain resilience, innovation, manufacturing and national security. Causal assessment: industry advocacy was publicly visible and trade associations claimed a role; bipartisan geopolitical and supply-chain concerns were independent drivers.

Mechanism. Semiconductor advocacy succeeded partly by reframing industrial subsidies as a combined economic, supply-chain and national-security problem. Firms, suppliers, trade associations, state officials and universities could therefore speak to different committees and constituencies while supporting a broadly shared objective.

Evidence and counterfactual. The coalition was aligned with a wider bipartisan concern about semiconductor dependence and competition with China. Lobbying plausibly helped design provisions and maintain coalition support, but those geopolitical conditions were independent drivers of enactment.

Case 6 - Inflation Reduction Act, 2022

Institutional pathway: compressed legislative bargaining was followed by extended implementation at Treasury, IRS, DOE, EPA, HHS and other agencies. This makes the case useful for studying the migration of lobbying from Congress to administrative venues after enactment.[92]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Interests: pharmaceutical manufacturers, insurers, energy companies, manufacturers, private equity, tax groups and climate advocates. Objective: support, revise or defeat healthcare, tax and clean-energy provisions. Strategy: rapid direct outreach, state-based grasstops, advertising and provision-specific bargaining after the bill was unexpectedly revived. Public reporting documented pharmaceutical advertising and intensive business lobbying. Outcome: IRA enacted with late changes to tax provisions. Causal assessment: some changes can be traced through public negotiation, but no single lobbying expenditure explains passage or the full statutory design.

Mechanism. The IRA compressed high-stakes bargaining into a short legislative window. Because the package combined tax, energy and healthcare provisions, organizations often lobbied on individual sections rather than the bill as a whole. Rapid technical drafting and coalition signaling became more valuable as floor timing narrowed.

Evidence and counterfactual. Late textual changes can sometimes be traced to specific negotiations, but the overall enactment depended on intra-party bargaining and reconciliation procedure. The case demonstrates why the most observable lobbying activity may occur after the basic political decision to legislate has already been made.

Case 7 - Medicare Drug Price Negotiation, 2023-2026 implementation

Institutional pathway: statutory authority created a recurring administrative process involving CMS guidance, manufacturer participation, data submission and litigation. Measuring lobbying influence therefore requires separating statutory design from later administrative interpretation.[93]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Objective: shape CMS implementation of the statutory negotiation program, data requirements, manufacturer obligations and operational effectuation. Institutions: CMS/HHS, OMB and courts. Strategy: comments, technical engagement, litigation and legislative advocacy. Current status: negotiated maximum fair prices for the first 10 drugs took effect Jan. 1, 2026; CMS issued a proposed rule in June 2026 and further draft guidance in July 2026 for later cycles. Causal assessment: this is a continuing regulatory campaign where success must be measured in implementation details, not only repeal/enactment.

Mechanism. After enactment, influence shifted toward administrative interpretation, data methodology, timelines, operational guidance and litigation. The relevant expertise changed from coalition politics to statutory construction, health economics and implementation detail.

Evidence and counterfactual. Regulatory comments and court filings provide richer process evidence than expenditure totals. Researchers can compare draft guidance, stakeholder submissions and final agency positions to identify which technical arguments were adopted, while remaining cautious about attributing adoption to any one participant.

Case 8 - Net neutrality

Institutional pathway: the issue repeatedly moved among FCC rulemakings, courts, Congress and changing administrations. It is therefore an example of policy feedback: the same coalition can return to the same issue after a legal or electoral change reopens the venue.[94]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Interests: broadband providers, internet companies, consumer advocates and other technology interests were often on opposing sides. Objective: influence FCC classification and open-internet rules. Strategy: formal comments, technical/economic submissions, mass grassroots campaigns, litigation and congressional advocacy. Outcome: policy changed across administrations and court proceedings. Causal assessment: the case demonstrates that “technology industry” is not a single lobbying bloc and that regulatory advocacy can recur through multiple policy cycles.

Mechanism. Net-neutrality politics repeatedly moved among FCC rulemaking, Congress, courts and public mobilization. That venue shifting gave both sides incentives to invest in legal doctrine, engineering claims, consumer messaging and grassroots participation.

Evidence and counterfactual. Policy reversals across administrations indicate that formal lobbying occurs within a larger structure of elections, appointments and judicial review. This makes the case especially useful for studying institutional position rather than spending alone.

Case 9 - Defense procurement: C-5B, 1982

Institutional pathway: the C-5B episode demonstrates a legal boundary rather than a model campaign. GAO concluded that government-funded activity had crossed restrictions on lobbying, illustrating why source of funds and identity of the advocate matter independently of the policy merits.[95]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: Department of the Air Force, Lockheed and related contractors/employees. Objective: support House authorization for C-5B procurement. GAO found a cooperative effort to influence Congress and concluded that the Air Force participation violated an appropriations restriction on using appropriated funds to influence pending legislation. Analytical significance: the case is valuable because it illustrates that government-industry advocacy can cross statutory restrictions; it should not be generalized to ordinary private-sector lobbying.

Mechanism. Procurement advocacy can involve contractors, local employment interests, military requirements and congressional budget politics. The C-5B investigation is distinctive because GAO examined the legal boundary created when appropriated government resources are used to influence pending legislation.

Evidence and counterfactual. The case should not be generalized to ordinary contractor lobbying. Its value is legal and institutional: it demonstrates that who pays for the advocacy and which resources are used can change the legality of conduct even when the policy objective itself is conventional.

Case 10 - Tobacco control and the Master Settlement era

Institutional pathway: tobacco policy combined state litigation, federal regulation, congressional debate, public-health advocacy and industry political activity. The settlement era demonstrates how litigation can reconfigure the bargaining environment in which lobbying occurs.[96]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: tobacco companies, state attorneys general, public-health groups and legislatures. Objective: liability settlement, advertising/youth restrictions and subsequent tobacco-control policy. The Master Settlement Agreement imposed specific limits and disclosure-related obligations affecting industry lobbying in settling states. Analytical significance: lobbying existed alongside litigation, state enforcement and public-health advocacy; the policy outcome cannot be reduced to federal lobbying totals.

Mechanism. Tobacco policy combined litigation, state attorney-general action, public-health campaigns, federal and state lobbying, advertising restrictions and disclosure. Influence therefore cannot be reconstructed from congressional contacts alone.

Evidence and counterfactual. Litigation risk and changing public opinion altered bargaining power independently of lobbying expenditure. This is a useful example of how legal liability and reputational change can transform the political opportunity structure facing an industry.

Case 11 - Cryptocurrency market structure, 2026

Institutional pathway: crypto firms pursued statutory market structure while agencies retained existing enforcement and regulatory roles. The 49-50 procedural defeat near the cutoff demonstrates that political investment cannot overcome every coalition and procedural constraint.[97]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: crypto firms and associations, banking interests, consumer-protection voices and lawmakers. Objective: federal market-structure legislation and regulatory clarity. Current outcome: on Sept. 16, 2026, the Senate failed to advance the Clarity Act in a 49-50 procedural vote. Reuters reported very large recent industry political spending and an active banking counter-campaign. Causal assessment: the defeat is a direct counterexample to the proposition that high spending guarantees legislative success; coalition structure and issue conflict remained decisive.

Mechanism. Crypto firms sought statutory clarity while banks, consumer groups and different digital-asset business models contested jurisdictional details. Political spending increased access and issue salience but could not eliminate procedural hurdles or substantive disagreement.

Evidence and counterfactual. The 49-50 procedural defeat is unusually informative because it occurred despite a highly visible and well-funded industry campaign. It does not prove lobbying was ineffective; it shows that the marginal value of spending is conditioned by coalition breadth, chamber procedure and the distribution of preferences.

Case 12 - AI regulation and infrastructure, 2025-2026

Institutional pathway: AI firms engaged Congress and a wide executive-branch network on safety, standards, infrastructure, energy, procurement, export controls and national security. Because the regime is still evolving, agenda-setting and definitional influence may be as important as amendments to a mature statute.[98]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: AI developers, cloud/platform companies, utilities, semiconductor firms, civil-society groups and national-security institutions. Objective: influence federal/state regulatory architecture, export controls, model policy, data-center infrastructure and procurement. Spending signal: FT reported OpenAI at about $2.22 million and Anthropic at about $3.53 million of federal lobbying in H1 2026. Outcome: as of cutoff, policy remains fragmented across Congress, executive action, export controls, procurement and state law. Causal assessment: an emergent-industry case where agenda formation may matter more than changing final statutory text.

Mechanism. AI lobbying simultaneously targets rule design and the material infrastructure needed to deploy models: chips, data centers, electricity, procurement, export controls and national-security policy. This produces a multiplex network in which the same company can interact with Congress, Commerce, DOD, the White House, energy agencies and state governments.

Evidence and counterfactual. Because the federal regulatory architecture remains unsettled, success is often agenda-setting rather than final enactment. Researchers should measure whether firms shape definitions, jurisdiction, procurement pathways and standards, not only whether a comprehensive AI statute passes.

Case 13 - South Korean semiconductor and industrial-policy engagement

Institutional pathway: Korean corporate and governmental interests operate through different legal channels. U.S. subsidiaries file under the LDA when applicable, while representation of foreign governmental principals can trigger FARA. The policy network includes Congress, Commerce, USTR, EOP and sectoral trade associations.[99]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: Korean government, embassy, Samsung, SK and other manufacturers. Objective: CHIPS implementation, trade/export controls, investment incentives, workforce and supply-chain policy. Strategy: sovereign representation under FARA where applicable, U.S.-subsidiary LDA lobbying, trade-association participation and local economic-development coalitions. Outcome: ongoing implementation. Analytical significance: demonstrates the need to distinguish foreign-government representation from corporate U.S. lobbying.

Mechanism. Korean firms combine U.S.-subsidiary LDA activity, trade-association participation, state investment coalitions and - where sovereign entities are represented - FARA-regulated engagements. Industrial policy makes this a cross-border corporate-government network rather than a simple foreign-government lobbying case.

Evidence and counterfactual. Public filings can document who represented whom and which institutions were contacted, but they cannot prove that an incentive award, export-control modification or implementation decision resulted from lobbying. The appropriate method is transaction-level process tracing.

Case 14 - Clean-energy tax-credit implementation

Institutional pathway: tax-credit advocacy after enactment centers on Treasury/IRS definitions, eligibility, guidance and compliance, while DOE and other agencies shape adjacent program implementation. Technical tax and supply-chain evidence can therefore be more useful than generic political messaging.[100]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: renewable developers, utilities, manufacturers, labor, fossil-energy firms, tax advisers and state/local interests. Objective: define eligibility, domestic-content, transferability, hydrogen, manufacturing and other IRA tax-credit rules. Institutions: Treasury/IRS, DOE, EPA and Congress. Strategy: technical comments and implementation-focused lobbying after enactment. Analytical significance: large statutes create a second-stage influence market in which regulatory definitions can be as economically important as statutory language.

Mechanism. Tax-credit lobbying occurs after enactment because Treasury and IRS must translate statutory language into definitions, eligibility rules, substantiation requirements and transition provisions. Trade associations and firms therefore compete to place technically plausible interpretations into the administrative record.

Evidence and counterfactual. Draft-to-final comparison is particularly useful here. If final regulations adopt language found in stakeholder submissions, that is evidence of informational uptake but still not definitive proof that the submitting organization caused the change.

Case 15 - Corporate minimum tax implementation

Institutional pathway: tax legislation creates a post-enactment market for Treasury and IRS guidance, accounting interpretation and congressional technical corrections. The counterfactual challenge is acute because many implementation choices arise from statutory ambiguity rather than direct lobbying demand.[101]

Measurement note: A defensible causal claim would require evidence that the advocacy changed the decision relative to a plausible counterfactual. Expenditure, meetings, favorable language and temporal sequence are evidence of activity or access; none is sufficient by itself to establish causation.

Actors: large corporations, tax advisers and business associations. Objective: shape implementation of the IRA corporate alternative minimum tax. Public reporting described substantial lobbying as Treasury worked through complex implementation questions. Analytical significance: technical tax lobbying is often about definitions, transition rules and administrability rather than public ideological messaging.

Mechanism. Corporate minimum-tax advocacy is heavily technical. The principal questions involve accounting definitions, scope, transition rules, foreign income, credits and administrability rather than broad public messaging.

Evidence and counterfactual. Because Treasury must produce workable rules, industry expertise can have genuine informational value. The democratic concern is asymmetric capacity: firms with sophisticated tax counsel may be much better positioned than diffuse constituencies to identify and influence highly technical implementation choices.

Case-study evidence table[102,103,104,105,106,107,108,109,110,111]

Case	Verified public evidence	Outcome measure	Causal confidence
ACA	Lobbying spending, former-official staffing, bill history	Enactment + provision design	Low to medium at provision level; low for spending-to-law causal claims
Dodd-Frank	Large registered lobbying population and spending	Enactment + later rules	Low for aggregate spending; higher for traceable rule comments/amendments
Big Tech antitrust	Firm spending, committee action, public campaigns	Bills advanced but not enacted	Low/medium; many confounders
CHIPS	Statutory funding/tax credit; association advocacy	Enactment + implementation	Medium for coalition participation; low for exclusive causation
IRA	Public lobbying/ads and late negotiation	Enactment + provision changes	Medium for documented negotiations; lower in aggregate
Medicare negotiation	CMS dockets, guidance, litigation	Rule/guidance design	Potentially high for traceable docket responses

Case	Verified public evidence	Outcome measure	Causal confidence
Crypto 2026	Vote, spending reports, counter-lobbying	Procedural defeat	High for outcome; low for assigning single cause
C-5B	GAO investigation	Legality of government-funded influence effort	High for documented GAO findings

PART XXXI. CONDITIONS FOR SUCCESSFUL LOBBYING

Literature review: six competing but complementary ways to understand lobbying

Pluralism and organized representation

Pluralist traditions treat groups as mechanisms through which social interests organize and compete. The central question is not whether groups exist, but whether mobilization is sufficiently broad and countervailing. The weakness is organizational bias: diffuse interests often face higher collective-action costs than concentrated interests.

Collective action and organizational bias

Olson’s collective-action framework helps explain why small groups with concentrated benefits can organize more readily than very large groups with diffuse benefits. Modern lobbying research extends this insight by examining who develops permanent Washington capacity and who appears only episodically.

Information and legislative subsidy

Hall and Deardorff’s legislative-subsidy model argues that lobbyists can provide policy information, political intelligence and legislative labor to policymakers already inclined toward an objective. This shifts attention from persuasion of opponents to capacity enhancement of allies.

Access, expertise, and relationship capital

Bertrand, Bombardini and Trebbi find evidence for both issue expertise and personal connections, with a more consistent monetary premium for connections. Blanes i Vidal, Draca and Fons-Rosen identify a sharp revenue decline when a connected senator exits, strengthening the argument that relationship capital has measurable economic value.

Corporate political capacity and professionalization

Drutman’s historical account emphasizes the growth of permanent corporate political capacity since the 1970s. The professionalization thesis helps explain why lobbying firms increasingly resemble other relationship-intensive professional services: they sell judgment, continuity, organizational memory and coordinated access rather than one-off favors.

Policy outcomes, context, and methodological caution

Baumgartner and coauthors show that large resource advantages do not mechanically translate into policy change, while Hojnacki and coauthors emphasize context and the difficulty of generalizing across issues. Bombardini and Trebbi’s review of empirical lobbying models highlights unresolved problems in identifying equilibrium policy effects and welfare consequences.

Regulatory capture as a separate hypothesis

Capture theory asks whether regulatory institutions become systematically aligned with regulated interests. Carpenter and Moss emphasize that capture should be specified in terms of mechanisms and outcomes rather than used as a synonym for lobbying. This report therefore treats lobbying as an observable activity and capture as a stronger causal claim requiring separate evidence.[112,113,114,115,116,117,118,119]

Comparative theoretical framework

Lens	Core mechanism	Observable evidence	Principal limitation
Pluralism	Groups compete to represent organized interests	Countervailing mobilization; multiple organizations contesting an issue	Unequal capacity to organize can bias participation
Collective action	Concentrated interests organize more readily than diffuse interests	Durable organizations where benefits are concentrated; episodic mobilization among diffuse publics	Does not by itself identify policy causation
Legislative subsidy	Lobbyists supply information, political intelligence, and legislative labor to allies	Technical material, drafting assistance, repeated work with aligned offices	Can understate persuasion, opposition, and outside politics

Lens	Core mechanism	Observable evidence	Principal limitation
Relationship capital	Trusted ties lower information and access costs	Revenue or client effects when political connections change	Relationships and expertise are difficult to separate empirically
Corporate political capacity	Organizations build permanent professional infrastructure	In-house GA teams, outside retainers, coalitions, regulatory specialists	Capacity does not guarantee policy success
Regulatory capture	Institutional incentives can align regulators with regulated interests	Systematic departures from statutory mission or asymmetric institutional dependence	Requires stronger evidence than lobbying activity alone

A heuristic such as Money x Expertise x Access x Timing x Political Alignment x Coalition Strength x Public Support x Institutional Position is conceptually useful, but it should not be treated as a literal formula. Empirical research points to multiple causal mechanisms that operate differently across issues.

1. Legislative subsidy: lobbyists provide information and labor to policymakers already inclined toward the objective.
2. Access and relationships: connections shape who receives attention and where professionals can operate efficiently.
3. Expertise: complex policy increases the value of credible technical knowledge.
4. Status-quo advantage: blocking or delaying change may require less coordination than creating a new regime.
5. Coalition structure: policymakers respond to the breadth, credibility, and constituency composition of support and opposition.
6. Timing: early intervention can shape issue definition and draft language before positions harden.

PART XXXII. HOW CAN LOBBYING EFFECTIVENESS BE MEASURED?

This is one of the most difficult methodological problems in the field. If Company X spends $10 million lobbying and obtains Policy Y, at least three explanations are possible: lobbying caused Y; Y was already likely and the lobbying was defensive or redundant; or both Y and lobbying were driven by a third factor such as a macroeconomic shock or partisan agenda.

Researchers therefore use before/after comparisons, matched cases, panel data, instrumental variables, natural experiments, difference-in-differences, discontinuities created by politician exits, network analysis, text analysis, process tracing, interviews, and amendment histories.

Outcome measurement must also be broader than enactment. Success can include blocking a proposal, delaying a rule, narrowing scope, obtaining a waiver, changing technical definitions, influencing implementation guidance, preserving appropriations, or gaining early agenda access.

PART XXXIII. ECONOMIC AND DEMOCRATIC EVALUATION OF LOBBYING

Functional arguments	Critical arguments
Representation of organized interests	Unequal access across social groups
Information and technical expertise	Resource inequalities can amplify already-powerful actors
Stakeholder feedback and implementation knowledge	Potential regulatory capture
Petition and association rights	Revolving-door and conflict-of-interest concerns
Warnings about unintended policy effects	Opacity and incomplete disclosure
Specialized knowledge can improve policy design	Agenda bias: some interests participate continuously while others are episodic

Both sets of claims can be true simultaneously. The central democratic question is not simply whether lobbying exists; it is who can afford sustained representation, whose information is repeatedly supplied to decision-makers, and whether transparency and institutional safeguards allow competing interests to participate on meaningful terms.

Gilens and Page found substantial independent associations between affluent-citizen preferences, organized interest groups, and historical policy outcomes in a dataset of 1,779 cases from 1981-2002. The study remains influential and debated; it should not be presented as a direct measurement of the 2026 lobbying market.

PART XXXIV. REGULATORY CAPTURE

Regulatory capture describes situations in which a regulator systematically serves or becomes aligned with regulated interests rather than the statutory public purpose. Proposed mechanisms include information dependence, revolving doors, repeated interactions, industry expertise advantages, political pressure, and asymmetric organization.

Lobbying and regulatory capture are related but not identical. A company submitting technical comments to EPA is engaging in advocacy. A claim of capture requires stronger evidence that the regulator's decision-making has become systematically biased toward regulated interests or away from its legal mission.

Diagnostic criteria

Capture should be treated as a testable institutional hypothesis rather than a rhetorical label. Relevant evidence can include persistent divergence from statutory mission, one-sided information dependence, repeated procedural advantages for regulated parties, revolving-door patterns that affect decisions, distributional outcomes that are difficult to explain by the statutory objective, or evidence that credible alternatives were systematically excluded. None of these factors alone establishes capture.

The analytical discipline is to compare the observed regulatory process against the agency's legal mandate and plausible counterfactual decision paths. Lobbying activity may be one mechanism in such an inquiry, but the existence of meetings, comments, or former officials is not by itself sufficient to prove institutional capture.

Diagnostic	Question	Evidence to seek
Statutory mission	Does the pattern of decisions fit the agency's legal mandate?	Rules, reasons, judicial record, internal/external evidence
Information dependence	Is the agency structurally dependent on one side for expertise or data?	Comment records, meetings, technical submissions, staffing capacity
Procedural asymmetry	Do some interests repeatedly receive advantages not available to others?	Meeting access, timing, waivers, exemptions, record participation
Personnel incentives	Do career transitions plausibly affect relevant decisions?	Recusal records, cooling-off rules, career histories, decision timing
Counterfactual alternatives	Were credible alternatives considered and answered?	Proposed rules, comments, final-rule explanations, litigation record

PART XXXV. COMPETITIVE ADVANTAGE OF LOBBYING FIRMS

- Institutional access and trusted working relationships
- Reputation for accuracy and discretion
- Policy and legal expertise
- Former officials and staff with relevant experience
- Bipartisan teams
- Sector specialization
- Committee and leadership relationships
- Agency expertise
- Business development and client origination
- Client portfolio and cross-client intelligence
- Confidentiality and compliance
- Execution under procedural time pressure

Bipartisan firms are commercially important because federal power is divided across parties, chambers, committees, agencies, and administrations, and because control changes over time. Bipartisan capability can provide continuity and broader coverage, though a client may sometimes value deep sector or committee specialization more than nominal partisan balance.

PART XXXVI. DEMOCRATIC, REPUBLICAN, AND INSTITUTIONAL NETWORKS

Lobbying firms should not be simplistically categorized as belonging to one political party. A more accurate model distinguishes Democratic-connected professionals, Republican-connected professionals, career and nonpartisan agency expertise, administration-specific networks, and committee-specific networks within the same firm or client team.

Changes in presidential administrations or congressional control alter the relative market value of certain networks. Reuters reported that Ballard Partners' Q2 2026 federal lobbying revenue was 654% above Q2 2024 amid strong demand associated with its Republican and Trump-world relationships. This is a commercial observation, not a measure of political merit or lobbying success.

A useful way to understand partisan networks is as four overlapping layers: administration-specific relationships, committee-specific relationships, durable career-agency expertise, and party/campaign networks. Their commercial value changes at different speeds. Administration ties can reprice quickly after elections; committee and leadership ties change with congressional control; career-agency expertise is often more durable; and party networks can matter most when policy questions become electoral or leadership priorities.

The most resilient firms therefore do not rely on one partisan channel. They combine people who understand different institutions and political coalitions, while assigning clients to teams whose substantive and procedural expertise fits the issue. Part XXXVII treats relationship capital as the mechanism that turns these networks into repeatable access, information, and working trust.

PART XXXVII. NETWORK CAPITAL IN WASHINGTON

Level	Meaning
1. Recognition	The person knows who you are.
2. Contact	They will take or return the call.
3. Trust	They believe your information is reliable.
4. Access	They will engage substantively rather than merely receive the message.
5. Working relationship	You can exchange information and solve procedural or policy problems professionally.
6. Institutional capital	The relationship survives personnel, electoral, and organizational change.

Valuable networks include congressional leadership, committee chairs and ranking-member staffs, staff directors, appropriators, authorizers, agency officials, White House policy personnel, party operatives, trade associations, think-tank experts, donors, and journalists. The key distinction is between simply knowing someone and possessing a relationship that produces meaningful policy access, trusted information exchange, or faster institutional navigation.[120]

Network-analysis framework: from metaphor to measurable structure

Network analysis turns the Washington "ecosystem" metaphor into a set of observable relationships. Nodes can be organizations or people: clients, lobbying firms, individual lobbyists, committees, agencies, think tanks, trade associations and media organizations. Edges can represent employment, lobbying registration, contact, co-membership, coalition participation, donations, testimony, co-authorship or revolving-door movement. Different edge types should not be collapsed without explanation.

Degree centrality measures how many direct ties a node has; it can identify broadly connected firms or institutions but says little about the quality of those ties. Betweenness centrality measures brokerage - whether a node lies on many shortest paths connecting otherwise separate clusters. In lobbying, a professional who connects a specialized industry cluster to a powerful committee or agency may have high brokerage value even with fewer total relationships.

Multiplexity matters because Washington relationships often overlap. A former staffer may have an employment tie to a committee, a lobbying tie to a client, a professional-association tie to peers and an information tie to journalists. Strong analysis therefore distinguishes a simple "knows" relationship from repeated working relationships, substantive trust and institutionally relevant access.

Two-mode networks are especially useful. One mode can be clients and the other lobbying firms; another can be lobbyists and government institutions. Projecting those networks reveals clusters, shared intermediaries and potential bridges. But a projected tie does not prove coordination: two companies using the same firm may still have opposing policy goals.

Temporal analysis is essential. Network capital changes when elections, retirements, committee assignments, agency appointments or firm moves alter ties. The revolving-door literature demonstrates that relationship value can decay discontinuously when a connected official leaves office, which is precisely why static organization charts understate the dynamics of the market.

Miniature empirical network from public Korean-interest filings

The following demonstration uses only publicly disclosed edges and is not intended as a complete influence map. It shows how different disclosure regimes create a multiplex network.

Node	Publicly disclosed edge	Government / intermediary nodes	Issue layer
Samsung Electronics America	LDA client / in-house registrant	Congress; Commerce; EOP; USTR	CHIPS implementation, U.S. investment, procurement, FY2026 NDAA
SK Americas	LDA in-house registrant	Congress; Commerce/BIS/NIST/ITA; NSC; OSTP; State	Semiconductors, AI, trade and industrial policy
LG Electronics USA	LDA in-house registrant	Congress	FY2026 NDAA and tariffs in cited filing
Hanwha Aerospace	LDA in-house registrant	Congress; DOD; State; Commerce; Treasury; USTR; DHS; EOP	Defense, shipbuilding, shipping, natural-gas infrastructure
Embassy of the Republic of Korea	Foreign principal under FARA engagements	Brownstein; Cornerstone	Government relations, strategic counsel, professional-visa advocacy
ROK Ministry of Trade, Industry and Energy	Foreign principal under FARA engagement	Arnold & Porter	Trade and investment advocacy / legal analysis

PART XXXVIII. LOBBYIST CAREER PATHS

Route	Typical path	Strength	Potential limitation
Congressional route	University -> internship -> staff assistant -> legislative correspondent -> legislative assistant -> legislative director -> committee staff -> Government Affairs / lobbying	Hill procedure, staff network, legislative drafting	Can be narrow if career never develops sector expertise outside politics
Legal route	Law school -> law firm -> agency/regulatory practice -> public policy/lobbying	Technical legal credibility, privilege awareness, regulatory depth	May initially have thinner electoral/party networks
Agency route	Technical degree -> federal agency -> senior policy/regulatory role -> industry GA	Implementation knowledge, career-official networks, subject expertise	Can be institution-specific
Campaign/party route	Campaign -> party/political organization -> administration -> public affairs/lobbying	Political networks, communications, administration access	May be more administration-dependent

The most durable careers combine relationships with substantive expertise. Networks tied only to one politician or administration can depreciate quickly; deep sector knowledge combined with broad institutional relationships tends to be more portable.

PART XXXIX. LOBBYIST COMPENSATION

Compensation data are less transparent than lobbying revenue data. FiscalNote's 2025 government-affairs survey reported that the largest respondent group, approximately 29%, earned $101,000-$160,000, with meaningful shares above $160,000 and 12% reporting more than $251,000. Survey samples are not equivalent to a census of federal lobbyists.

Level	Illustrative evidence / range	Typical structure
Entry-level / junior Government Relations associate	$60K-$80K illustrative current postings	Base salary, sometimes modest bonus
Manager / Senior Manager	$100K-$170K approximate market range	Base + performance bonus
Director	$120K-$170K+ depending sector and organization	Base + bonus; sometimes long-term incentive
VP / senior in-house Government Affairs	$200K-$300K+ in some large-company postings	Base + cash bonus + equity/long-term incentive
Lobbying-firm partner / rainmaker	Highly firm-specific; no reliable standardized public market figure	Salary/draw + origination/collections + profit participation/equity

Precise market-wide compensation for major lobbying-firm equity partners and rainmakers is not publicly standardized. Estimates should therefore be labeled as estimates rather than presented with false precision.[121]

Compensation architecture: what can be known and what cannot

Compensation evidence is much weaker than lobbying-revenue evidence because most firms are private partnerships and partner compensation is not reported under the LDA. Current job postings can identify base-salary bands for specific roles; industry surveys can estimate distributions; public-company disclosures can illuminate economics at the firm level. None of those sources supports a precise market-wide “average rainmaker pay” figure. This edition therefore separates observed salary postings from conceptual partner economics.

Role	Illustrative base-salary evidence / structure	Compensation drivers
Junior associate / analyst	$60k-$80k is common in reviewed current Washington postings; firm and experience matter materially.	Research, writing, monitoring, responsiveness
Manager / senior manager	Often low-to-mid six figures in current postings.	Portfolio ownership, client service, issue expertise
Director	Frequently mid-six-figure range, with large variance by sector/employer.	Team leadership, institutional network, policy ownership
VP / senior in-house GA	Current large-company postings can exceed $200k and in some cases approach or exceed $300k base.	Executive judgment, enterprise risk, senior relationships, management
Firm partner / managing director	Private and highly variable; base/draw plus bonus or profit participation.	Collections, origination, client retention, team economics
Rainmaker / equity partner	No defensible standardized public market average.	Portable book of business, origination, profitability, strategic leadership

A partner who originates $5 million of annual collected revenue but requires a very large senior team may be less profitable than a specialist partner with a smaller book and higher leverage. Conversely, a rainmaker who brings high-retention clients can have option value beyond current-year collections because the book generates cross-selling and recruitment advantages. This is why partner compensation systems often contain negotiated and discretionary elements rather than a simple salary ladder.

Partner economics, origination, and portability

Private lobbying partnerships rarely publish compensation formulas, so market-wide precision would be misleading. Conceptually, senior compensation can combine a base draw or salary, annual bonus, origination credit for clients introduced, credit for collected revenue, matter-management responsibility, cross-selling credit, equity participation and discretionary profit allocation. The relative weight assigned to each variable shapes firm culture.

A “portable book” matters because a senior lobbyist may be able to move clients when changing firms. Firms reduce this risk by institutionalizing client relationships across teams, integrating research and compliance support, and cross-selling multiple services so that the client relationship is not dependent on one individual. This is analogous to partner economics in law firms and senior relationship economics in investment banking.

In-house Government Affairs executives are compensated differently. Their value is not measured by external origination but by enterprise risk management, policy outcomes, access, executive counsel, team leadership and the integration of federal, state, international and communications functions. Equity compensation may be material at large public companies, making base-salary comparisons alone incomplete.

PART XL. THE FUTURE OF THE U.S. LOBBYING INDUSTRY

The policy areas most likely to sustain intensive government-business interaction over the next five to ten years include AI, cybersecurity, China policy, semiconductor controls, defense technology, industrial policy, critical minerals, energy transition, cryptocurrency, antitrust, data privacy, supply chains, trade, and national security. This identifies arenas of institutional activity; it is not a prediction that any particular policy will prevail.

How AI changes lobbying work

Automation potential	Likely activities
High	Bill tracking, hearing transcription, Federal Register monitoring, amendment comparison, source summarization, first-draft memos.
Medium	Stakeholder mapping, scenario analysis, coalition intelligence, policy modeling, document classification.
Lower	Trust formation, negotiation, institutional judgment, client origination, sensitive relationship management, credibility under uncertainty.

AI is therefore more likely to compress analytical and monitoring labor than to eliminate relationship-based advocacy. It may also increase the value of source verification because policymakers and clients will face much larger volumes of machine-generated analysis.

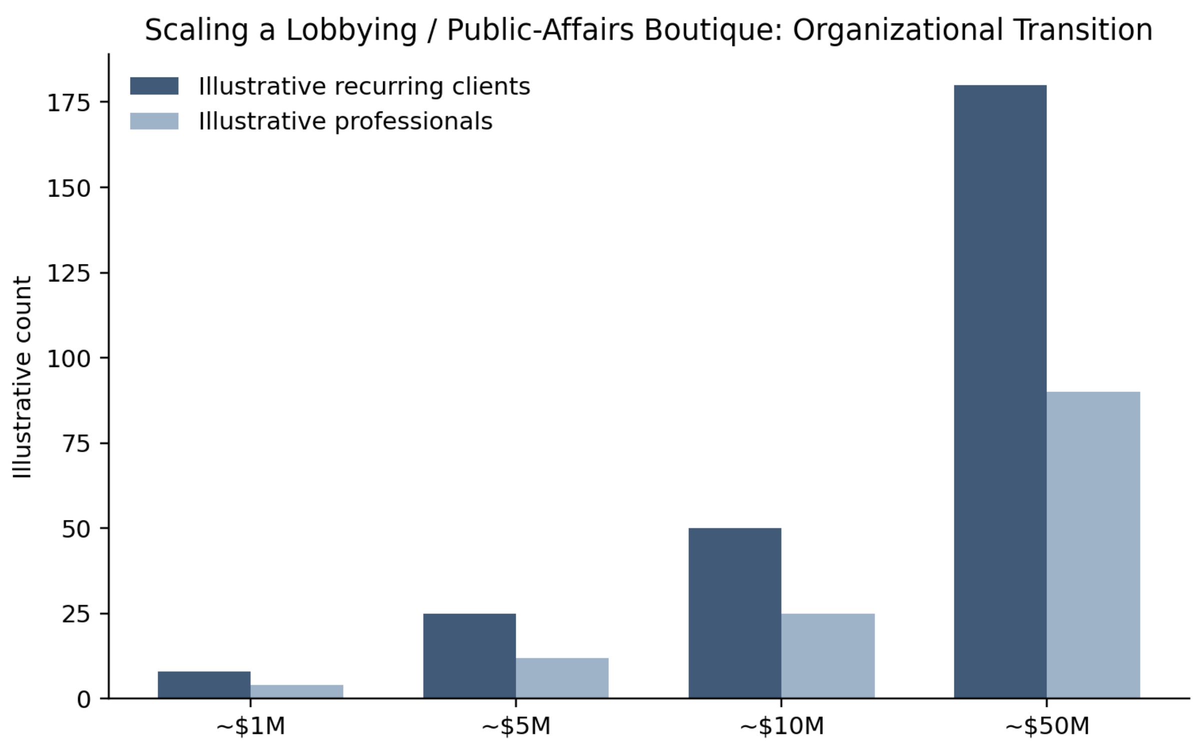
PART XLI. IF YOU WERE STARTING A LOBBYING / PUBLIC-AFFAIRS BOUTIQUE

A new boutique should begin with a narrow market position rather than claiming universal Washington coverage. Sector specialization, founder credibility, and repeatable client acquisition are more defensible than generic access claims.

Scale	Illustrative operating model
~$1M revenue	2-4 senior professionals; 1-2 analysts; 8-12 recurring clients; one or two sector niches; outsourced accounting/compliance. Founder-led origination dominates.
~$5M	Separate legislative and regulatory capability; broader bipartisan coverage; formal research process; communications partnerships; stronger institutional client service.
~$10M	Practice heads and sector verticals; formal business development; regulatory specialists; monitoring/data platform; more systematic recruiting and compliance.
~$50M	Platform model combining federal GR, state GR, public affairs, political intelligence, regulatory consulting, compliance, and research/data. Lateral hiring and acquisitions become plausible scaling tools.

Design principles

- Target market: a small number of regulated or policy-intensive sectors.
- Staffing: senior practitioner + policy specialist + strong analyst leverage, with bipartisan and career-agency coverage where relevant.
- Pricing: recurring retainers for ongoing representation; project fees for discrete transactions or crises.
- Client acquisition: referrals, sector events, law-firm relationships, content/research, and founder network.
- Compliance: integrated LDA, FARA, campaign-finance, gifts/ethics, conflicts, and client-intake review.
- Research: build proprietary issue tracking and institutional maps rather than relying on generic news summaries.
- Media strategy: deploy only when public pressure advances the policy objective; do not confuse visibility with influence.



Conceptual operating model, not a forecast. Actual client mix, pricing, leverage, and margins vary materially.

Figure 14. Conceptual organizational transitions while scaling a lobbying/public-affairs boutique. Counts are illustrative, not forecasts.

Illustrative five-year operating model

Scale	Indicative model	Average retainer logic	Organizational priority
~$1M revenue	Founder-led, 3-5 professionals, roughly 8-12 recurring clients	$8k-$20k monthly depending on seniority/scope	Niche credibility; founder origination; flawless compliance
~$5M	Multiple senior principals, 10-15 professionals, roughly 20-35 clients	Mix of $10k-$30k retainers + projects	Institutionalize client service; broaden bipartisan/agency coverage
~$10M	Practice leaders, 20-30 professionals, ~40-60 clients	Tiered retainers and regulatory/public-affairs cross-sell	Build research/operations platform and reduce founder concentration
~$50M	Multi-practice platform, potentially 75-100+ professionals and a large client book	Portfolio of large retainers, projects, integrated services	Recruitment/acquisition, practice P&Ls, brand, conflict management

Illustrative P&L logic, not a forecast

A boutique should model revenue capacity from professional time and relationship capacity rather than assume every new client is additive. Senior lobbyists can only maintain a finite number of high-touch relationships. Research and account staff create leverage, but clients usually expect access to named senior principals. A disciplined model therefore tracks revenue per professional, senior-time utilization, client concentration, renewal rate, unbilled business-development time, compliance cost, and the cost of lateral hires.

The $1 million stage is a practice; the $5 million stage begins to look like a firm; the $10 million stage requires management; the $50 million stage requires a platform. At each transition, the failure mode changes: founder dependence at the first stage, inconsistent service at the second, partner silos at the third, and culture/conflict/integration problems at the fourth.

PART XLII. A WASHINGTON STRATEGY FOR MEDIA COMPANIES, BUSINESSES, INVESTORS, AND STARTUPS OUTSIDE WASHINGTON

1. Identify the federal exposure: which law, rule, procurement decision, grant, tax provision, enforcement action, or trade measure can materially affect the organization?
2. Create an internal policy owner with authority to coordinate legal, business, communications, and external advisers.
3. Map relevant committees, agencies, White House/OMB processes, and state/local interfaces.
4. Join relevant trade associations selectively to gain intelligence and collective representation.
5. Build legal and compliance architecture before political activity expands.
6. Retain specialized external advisers only where expertise or network gaps exist.
7. Develop substantive relationships with congressional and agency staff based on credible information, not merely social access.
8. Produce research and policy positions that solve government problems as well as corporate problems.
9. Participate in legitimate coalitions where interests align.
10. Integrate media, grassroots, and public affairs only when the institutional strategy benefits from a wider political environment.

Common strategic error

Beginning with: Who famous can get us a meeting? Better question: What federal decision materially affects us, who actually controls it, what stage is it in, and what credible information or constituency can we bring to that decision?

PART XLIII. TWENTY MAJOR MYTHS ABOUT LOBBYING

Myth	Reality
Lobbying means bribery.	Ordinary lobbying and bribery are legally distinct; an unlawful exchange requires additional legal elements.
Lobbyists give politicians money for votes.	Lobbying fees and campaign contributions are separate legal systems; quid pro quo exchanges can be unlawful.
Members of Congress are the only important targets.	Staff, agencies, OMB, career officials, and executive offices can be operationally decisive.
Lobbyists spend most days having lunch with politicians.	Research, monitoring, drafting, staff work, and coordination occupy much of the profession.
The biggest spender always wins.	Empirical research does not support a mechanical highest-spender-wins rule.
All lobbying is corporate.	Labor unions, NGOs, universities, cities, states, public-interest groups, and foreign principals also seek representation.
Every lobbying firm is basically Republican or Democratic.	Many maintain bipartisan, career-agency, and committee-specific networks.
K Street lobbying occurs on K Street.	K Street is primarily a symbolic industry label today.
Campaign donations are lobbying expenditures.	They are separately defined, regulated, and reported.
Lobbyists influence only legislation.	Rulemaking, implementation, procurement, trade, sanctions, and enforcement are major arenas.
Former senators are always the most valuable hires.	A specialized former staffer can possess superior process knowledge and working-level relationships.
Lobbyists mainly persuade opponents.	They often strengthen allies by supplying labor, information, and coalition evidence.
Lobbyists always seek policy change.	Much lobbying seeks to defend the status quo or narrow implementation.
LDA records reveal the whole influence industry.	Formal registered lobbying is narrower than public affairs, grassroots, law, communications, and political intelligence.
Foreign lobbying is illegal.	Foreign representation can be lawful but may require FARA registration and detailed transparency.
Think tanks are lobbying firms.	They generally occupy a different institutional role as research and policy-idea organizations.
PR and lobbying are the same.	They overlap increasingly but have different core audiences and legal definitions.
Technical expertise does not matter because politics decides everything.	Complex policy often makes technical feasibility and implementation expertise highly valuable.
Lobbying victory is easy to measure.	Counterfactual causation, defensive wins, delay, and implementation effects make measurement difficult.
Clients buy access only.	Clients purchase a bundle of access, expertise, process knowledge, networks, intelligence, and execution.

PART XLIV. MAP OF KEY PEOPLE, INSTITUTIONS, AND ORGANIZATIONS

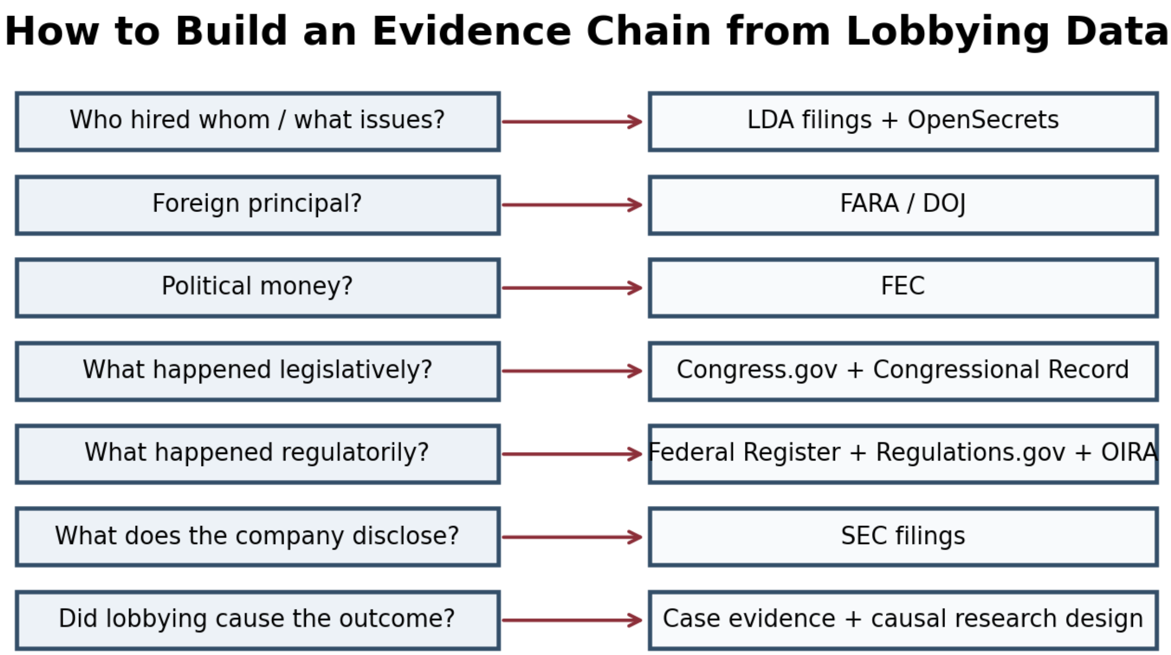


Figure 15. Evidence chain for reconstructing lobbying activity and evaluating causal claims.

A functional ecosystem map should include the following nodes: major independent lobbying firms; public-policy practices inside major law firms; corporate Government Affairs offices; trade associations; labor unions; NGOs; White House policy offices; OMB/OIRA; congressional leadership; authorizing and appropriations committees; federal regulatory agencies; think tanks; universities; public-affairs firms; political consultants; journalists; PACs and Super PACs; donor networks; grassroots organizations; and foundations.

High-value institutional nodes by policy type

Policy type	Congressional nodes	Executive / agency nodes	External nodes
Finance	House Financial Services; Senate Banking; tax/appropriations committees	Treasury, Fed, SEC, CFPB, CFTC	Banking/securities associations; market participants; consumer groups
Healthcare	House Energy & Commerce; Ways & Means; Senate HELP; Senate Finance	HHS, CMS, FDA	PhRMA, hospitals, insurers, physician groups, patient organizations
Defense	House/Senate Armed Services; Appropriations	DOD, service departments, NSC	Prime contractors, technology firms, think tanks
Technology / AI	Judiciary; Commerce-related committees; appropriations	FTC, DOJ, Commerce, NIST, DOD, White House	Tech firms, AI labs, universities, civil society
Energy / climate	Energy & Commerce; Natural Resources; Senate ENR; Finance	DOE, EPA, Interior, FERC, Treasury	Utilities, producers, renewables, environmental NGOs
Trade / industrial policy	Ways & Means; Senate Finance; relevant appropriations	USTR, Commerce, Treasury, White House	Manufacturers, importers, exporters, labor, foreign companies

PART XLV. GLOSSARY

Term	Definition
Lobbyist	A person who engages in lobbying under statutory or practical definitions.
Lobbying	Organized effort to influence governmental policy or decisions.
Lobbying Contact	A covered communication with specified federal officials under the LDA.
Lobbying Activity	Lobbying contacts plus supporting preparation, planning, research, and coordination.
Registrant	Entity registered under the Lobbying Disclosure Act.
Client	Entity represented or paying for lobbying services.
In-house Lobbyist	Employee lobbying on behalf of the employer.
Outside Lobbyist	Third-party professional representative retained by a client.
Government Affairs	Broad organizational function managing policy and government engagement.
Government Relations	Ongoing management of relationships with governmental institutions.
Public Affairs	Policy, stakeholder, and communications strategy affecting public decisions.
Advocacy	Promotion of a cause, interest, or policy position.
Issue Advocacy	Advocacy concerning public-policy issues rather than express electoral campaigning.
K Street	Metonym for the Washington lobbying and influence industry.
LDA	Lobbying Disclosure Act.
LD-1	Federal lobbying registration form.
LD-2	Quarterly federal lobbying activity report.
LD-203	Semiannual contribution-related disclosure for registrants/lobbyists.
HLOGA	Honest Leadership and Open Government Act of 2007.
FARA	Foreign Agents Registration Act.
Foreign Principal	Covered foreign entity or person represented under FARA.
Revolving Door	Movement between government positions and private influence roles.
Cooling-off Period	Temporary post-employment restriction on certain representational contacts.
Covered Official	Official included in statutory lobbying or ethics definitions.
PAC	Political action committee.
Corporate PAC	Corporate-sponsored separate segregated fund under campaign-finance law.
Super PAC	Independent-expenditure-only political committee.
Bundling	Collecting and delivering contributions in a coordinated manner subject to applicable law.
Dark Money	Common descriptive term for political funding where original donor identities may not be publicly visible.
501(c)(4)	Tax-exempt social-welfare organization that may engage in certain political and advocacy activity.
Quid Pro Quo	Exchange of a thing of value for an official act or benefit, depending on the applicable legal standard.
Grassroots	Mass constituent or member advocacy directed toward policymakers.
Grasstops	Advocacy using influential local stakeholders.
Inside Lobbying	Direct engagement with government decision-makers and staff.
Coalition	Group of organizations coordinating around a common policy objective.
Trade Association	Membership organization representing an industry or business sector.
Front Group	Critical term for an ostensibly independent group whose important sponsorship or control is obscured.
Legislative Affairs	Management of legislative and congressional engagement.
Regulatory Affairs	Management of interactions with regulatory agencies and rulemaking.
Rulemaking	Agency process for creating legally binding regulations.
NPRM	Notice of Proposed Rulemaking.
Comment Period	Period during which the public may submit formal comments on a proposed rule.
Federal Register	Official publication for federal rules, proposed rules, notices, and presidential documents.
Regulations.gov	Federal portal for rulemaking dockets and public comments.
OIRA	Office of Information and Regulatory Affairs within OMB.
OMB	Office of Management and Budget.
NEC	National Economic Council.
NSC	National Security Council.
Markup	Committee meeting at which legislation is debated and amended.
Hearing	Formal congressional information-gathering proceeding.
Amendment	Proposed change to legislative text.
Co-sponsor	Member formally joining sponsorship of a bill or resolution.
Authorization	Legislation establishing or authorizing a program or policy.
Appropriation	Legislation providing budget authority for government spending.

Term	Definition
Conference	Process for resolving House and Senate differences in legislation.
Committee Counsel	Committee legal and policy professional.
Professional Staff Member	Specialized committee policy staffer.
Legislative Assistant	Personal-office staff member responsible for policy portfolios.
Legislative Director	Senior staff member coordinating a Member's legislative agenda.
Staff Director	Senior manager of a congressional committee staff.
Chief of Staff	Senior office manager and political adviser.
Political Intelligence	Commercial research and analysis concerning governmental policy developments.
MNPI	Material nonpublic information.
Regulatory Capture	Systematic alignment of a regulator with regulated interests rather than its statutory public mission.
Stakeholder Mapping	Identification and analysis of relevant actors, relationships, interests, and influence.
Hill Outreach	Engagement with Congress and congressional staff.
Agency Outreach	Engagement with executive departments and regulatory agencies.
Rainmaker	Senior professional who originates significant client revenue.
Retainer	Recurring professional-services fee.
Policy Coalition	Alliance of organizations seeking a common policy objective.
Relationship Capital	Professional economic value arising from trusted networks and working relationships.

PART XLVI. FINAL SYNTHESIS

1. What is the fundamental nature of the U.S. lobbying industry?

It is a professional intermediary system connecting organized interests with a fragmented governmental decision-making system.

2. Why is the industry so large?

Because the federal government makes economically consequential decisions across taxation, regulation, spending, trade, defense, healthcare, technology, finance, labor, energy, and procurement while authority is divided among many institutions and thousands of officials.

3. What do lobbying firms actually sell?

Representation, institutional navigation, information, policy analysis, procedural knowledge, strategic communication, coalition coordination, political intelligence, and execution.

4. Is the real product access, information, expertise, networks, or a combination?

A combination. A useful conceptual expression is: lobbying value = trusted access + policy expertise + institutional process knowledge + timely information + execution capacity.

5. What are the core capabilities of effective lobbyists?

Policy expertise, political judgment, communication, trusted relationships, procedural fluency, credibility, timing, coalition management, and client-management ability.

6. How should a company combine internal Government Affairs and outside firms?

Internal Government Affairs should own strategy, corporate positions, institutional memory, and long-term relationships. Outside firms should fill network, sector, procedural, geographic, and surge-capacity gaps.

7. Why has Washington become such a large influence marketplace?

Federal power expanded at the same time policymaking became more technically complex and institutionally fragmented. Organizations created professional intermediaries to navigate that complexity.

8. What functions and problems does lobbying create simultaneously?

It provides representation, information, technical expertise, and feedback while also generating persistent concerns about unequal resources, unequal access, opacity, conflicts of interest, and regulatory capture.

Five-level summary

One sentence

The U.S. lobbying industry is the professional infrastructure through which organized interests obtain information, expertise, representation, access, and networks to participate in federal policymaking.

Approximately 100 characters

Washington lobbying turns interests, expertise, money, and networks into organized policy influence.

One paragraph

American lobbying is not simply the practice of asking politicians for favors. It is a multibillion-dollar professional-services industry connecting businesses, associations, labor unions, NGOs, foreign interests, universities, governments, and other organizations with Congress, the White House, and federal agencies. Lobbying firms sell a combination of policy expertise, institutional knowledge, political intelligence, trusted relationships, and execution capacity. Their effectiveness depends not merely on money but also on timing, procedural position, coalitions, credibility, expertise, public politics, and institutional circumstances.

One-page synthesis

The American lobbying system emerged because the federal government became simultaneously more powerful and more complex. Modern organizations cannot efficiently monitor every committee, appropriation, regulatory proceeding, procurement rule, tax provision, trade measure, agency interpretation, enforcement priority, or executive decision that can materially affect them. A specialized professional industry therefore evolved to intermediate between organized society and a fragmented governmental system.

Its visible core consists of more than $5 billion per year in recently reported federal lobbying activity, but that figure understates the broader influence marketplace because formal statutory definitions exclude parts of public affairs, grassroots activity, law, communications, political intelligence, think-tank influence, and other adjacent work.

Professional lobbyists do far more than arrange meetings. They interpret legislative language, monitor committees, analyze regulations, prepare technical information, draft policy material, coordinate coalitions, advise executives, and maintain relationships with policymakers and staff. Congressional staff and career regulators are consequently as important to understanding the industry as elected officials.

Lobbying firms operate economically like relationship-intensive professional partnerships. Their scarce assets are experienced personnel, reputation, expertise, networks, and client relationships. Academic research shows measurable economic value in political connections while also showing that lobbying often works by strengthening allied policymakers through information and labor rather than simply changing opponents' minds.

Money matters because it buys sustained organizational capacity, but empirical work does not support a simple highest-spender-wins theory. Institutional structure, the policy status quo, timing, opposition, public opinion, legal constraints, party control, and administrative process all affect outcomes. The correct unit of analysis is therefore an influence system: Congress + Executive Branch + Regulation + Law + Money + Information + Networks + Media + Public Opinion.

Concluding executive assessment

The deepest misconception about Washington lobbying is that the industry primarily sells personal friendship with powerful politicians. Personal connections have value, but they are only one input. The modern lobbying firm's deeper product is organized governmental navigation under conditions of institutional complexity.

A client possesses an economic, organizational, or social objective. Government possesses authority distributed across institutions. The lobbying professional connects the two by understanding what government is doing; why it is doing it; where jurisdiction actually resides; who has procedural control; what evidence matters; when intervention remains possible; which actors share the objective; which actors oppose it; and which legal and political constraints define the feasible outcome.

Final characterization

The U.S. lobbying industry is a professional influence system embedded in the institutional architecture of American government.

PUBLICATION CONTROL NOTE

This edition is designed as a controlled publication master. Current market tables are explicitly dated to the September 17, 2026 research cutoff. Durable analytical chapters are separated from update-sensitive revenue, personnel, client and filing data so that future editions can refresh empirical appendices without rewriting the conceptual framework.

Figures are editorial or analytical illustrations unless otherwise identified. AI-generated editorial images are not documentary photographs and should not be used as evidence of a particular meeting, person, firm or historical event. Tables derived from LDA, FARA, FEC, GAO, SEC or other public records should be interpreted under the methodology limitations stated in the relevant chapter.

Release format: this Final Publication Edition is designed for print and accessible digital distribution. It preserves embedded fonts, internal navigation, searchable text, document metadata, and image alternative text in a tagged PDF structure. A separate fast-web derivative may be created if linearized delivery is operationally required; this tagged edition remains the authoritative archival publication file.

DATA METHODOLOGY APPENDIX

Update-sensitive tables. Every table containing 2025 or 2026 market revenue, current firm personnel, current addresses, compensation postings or active filings should be read as “as of September 17, 2026.” Durable legal and conceptual sections are separated from these snapshots so a future edition can refresh the appendices without rewriting the analytical core.[122,123]

1. What federal lobbying totals measure

Federal lobbying totals are assembled from Lobbying Disclosure Act filings and therefore inherit the statute's definitions, thresholds, estimation rules, amendments and filer behavior. An outside firm reports lobbying income from a client; an organization employing in-house lobbyists reports lobbying expenses. Certain organizations may use tax-method alternatives permitted by law and guidance. These are disclosure measures, not a national-accounts measure of every dollar spent attempting to influence government.

2. Why Bloomberg Government and OpenSecrets totals can differ

Analytical providers normalize filings differently. Potential differences include amended reports, duplicate records, affiliated entities, the timing of downloads, rounded income/expense bands, treatment of tax-method filers, and classification of registrants. A defensible longitudinal chart therefore keeps a consistent provider/methodology. This report uses Bloomberg Government for the headline $5.3 billion 2025 market estimate and OpenSecrets-derived data reproduced in the PPHC SEC filing for the 25-firm and industry-category tables.

3. Revenue is not influence

Reported lobbying income is an economic measure of disclosed client payments to a registrant. It is not a measure of meetings, access quality, policy expertise, political alignment, coalition strength or causal policy impact. The report intentionally refuses to convert revenue into an influence score.

4. Current vs historical evidence

All “current” statements are evaluated as of September 17, 2026. Historical case studies retain the institutional and legal context of their own period. Historical studies such as Gilens and Page or Baumgartner and coauthors should not be presented as direct measurements of the 2026 Washington market; they are evidence about mechanisms and earlier periods.

5. Source hierarchy used

1. Statutes, official guidance, LDA/FARA/FEC filings, Federal Register/agency records, court and GAO materials.
2. Congressional Research Service/GAO and peer-reviewed academic research.
3. SEC issuer filings when they reproduce market data or disclose business economics.
4. High-reliability journalism and specialized databases for current market context.
5. Firm websites for self-descriptions, founding history, leadership and locations - attributed as company-provided information, not independent evaluations.

6. Causal-inference rule

The report uses “lobbied on,” “sought,” “advocated,” “reported contacts with,” and “participated in” where evidence establishes activity. It uses “caused,” “secured,” or “produced” only where evidence supports a causal or traceable process claim. Policy coincidence is not treated as proof of lobbying effectiveness.[124]

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Research cutoff: September 17, 2026

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