



Third Quarter Update 2025

Campaign Reporting and Advertising Disclosure

Regulations adopted by the Commission.

The following are regulatory changes approved by the Commission during the past quarter concerning campaign reporting or advertising disclosure. To receive updates for all regulations before the Commission, please sign up for our [mailing list here](#).

18404. Termination of Candidate and Section 82013 Committee Filing Requirements. (amend), adopted 10/16/25.

18404.1. Termination and Reopening of Committees. (repeal), adopted 10/16/25.

18404.1. Termination of Section 82013(a) Committees, 24-Month Mandatory Terminations, and Accepting Refunds after Termination. (adopt), adopted 10/16/25.

18404.3. Reopening a Terminated Section 82013(a) Committee. (adopt), adopted 10/16/25.

Advice Letters

The following are advice letters issued by the Commission's Legal Division during the past quarter concerning questions about campaign reporting or advertising disclosure. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Campaign

Margie L. Hieter - [A-25-040](#)

In developing the Campaign and Lobbying Activity Search and Disclosure system (Cal-ACCESS Replacement System or "CARS"), the Secretary of State has requested advice on standardizing reporting methods for two campaign reporting issues. First, if a late contribution report is filed for a contribution and the check comes back as non-sufficient funds, the late contribution report should be amended, and an entry added, to show the check returned for NSF, such that the information regarding the contribution and its subsequent return will be available on a single filing. Second, for a contributor who has given multiple times during a reporting period, the cumulative amount of contributions disclosed for the contributor should include all of the contributions made during the calendar year. If the contributor has reached the itemization threshold of \$100, all of the contributions made by the contributor during the reporting period shall be itemized on the campaign statement.

Carl DeMaio - [I-25-119](#)

Reportable activity undertaken by a candidate controlled general purpose ballot measure committee in coordination with another primarily formed ballot measure committee should be reported as in-kind contributions from the candidate controlled ballot measure committee to the committee primarily formed for the measure. Conversely, activity done solely by a candidate controlled ballot measure committee, independent of the measure's primarily formed committee, should be reported as independent expenditures in support of the measure. Separately, where no contributor has reached the \$50,000 top contributor threshold, it is not required under the Act for an advertisement to indicate that the committee has "no top contributors."

Section 84308

Hans Buder - [A-25-104](#)

Under Section 84308, a public official who has received a contribution exceeding \$500 from a party in an entitlement for use proceeding may take part in the proceeding, as long as the official (1) returns the excess portion within 30 days of taking part in the proceeding and (2) discloses the return of the excess portion on the record pursuant to Regulation 18438.8(a)(2).

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter involving violations of the Act's campaign reporting and advertising disclosure provisions. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

Campaign Contribution Limits

In the Matter of Kimberly Ho for City Council 2020 and Kimberly Ho; FPPC No. 21/1068. Staff: Laura Columbel, Commission Counsel and Ann Flaherty, Special Investigator. Kimberly Ho was a successful candidate for Westminster City Council in the November 3, 2020, General Election and Kimberly Ho for City Council 2020 was Ho's candidate-controlled committee. The Committee and Ho accepted campaign contributions that exceeded contribution limits, in violation of Government Code Section 85301, subdivision (a) and Regulation 18545 (1 count); and failed to timely report certain nonmonetary contributions on one semi-annual campaign statement, in violation of Government Code Section 84211 (1 count). **Fine: \$5,500.**

Campaign Non-Filer

In the Matter of Brown for Bassett School Board Member 2024 and Samuel Brown, FPPC

No. 24/1046. Staff: Theresa Gilbertson, Senior Commission Counsel. Brown was an unsuccessful candidate for the Bassett Unified School District Governing Board in the November 5, 2024 General Election. Brown for Bassett School Board Member 2024 was Brown's candidate-controlled committee. Brown and the Committee failed to timely file two pre-election campaign statements, in violation of Government Code Sections 84200.5, 84200.8, and 84206 (2 counts). **Fine: \$5,000.**

Campaign Late Filer/Reporter

In the Matter of Gary Hardie Jr., Gary Hardie for Lynwood Schools 2015, and Hardie for Lynwood Schools 2024; FPPC No. 21/627.

Staff: Jonathan Rivera, Commission Counsel. Gary Hardie Jr. was a successful candidate for the Lynwood Unified Board of Education in the November 2020 General Election and the November 2024 General Election. Gary Hardie for Lynwood Schools 2015 (the "2015 Committee") and Hardie for Lynwood Schools 2024 (the "2024 Committee") were Hardie's candidate-controlled committees. The 2015 Committee and Hardie failed to timely file one semi-annual campaign statement, in violation of Government Code Section 84200 (1 count), two pre-election campaign statements, in violation of Government Code Sections 84200.5 and 84200.8 (2 counts), and six 24-Hour Reports, in violation of Government Code Section 84203 (6 counts). Hardie failed to timely file an officeholder campaign statement, in violation of Government Code Section 84206 (1 count). The 2024 Committee and Hardie failed to timely file four 24-Hour Reports in violation of Government Code Section 84203 (4 counts). **Fine: \$2,558 (Tier One).**

In the Matter of AFSCME Local 3634 PAC and Q Arachchi; FPPC No. 22/926.

Staff: Bridgette Castillo, Senior Commission Counsel. Respondents were represented by Dexter Rappleye of Bush Gottlieb. AFSCME Local 3634 PAC is a state general purpose committee. Q Arachchi serves as the Committee's treasurer. The Committee and Arachchi failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts) and failed to timely file one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count). **Fine: \$1,910 (Tiers One and Two).**

In the Matter of Campbell High School Teacher's Association PAC, and Margarita Ortiz-Minett; FPPC No. 22/215.

Staff: Chance Felkins, Commission Counsel. Campbell High School Teacher's Association PAC is a local general purpose committee. Margarita Ortiz-Minett served as the Committee's treasurer. The Committee and Ortiz-Minett failed to timely file six semi-annual campaign statements, in violation of Government Code Section 84200 (6 counts), failed to timely file one pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count), and failed to file two 24-Hour Reports, in violation of Government Code Section 84203 (2 counts). **Fine: \$1,183 (Tier One).**

In the Matter of North American Pallet Association, and Alejandro Gonzalez Jimenez; FPPC No. 25/283.

Staff: Christopher B. Burton, Assistant Chief of Enforcement and Vanessa Greer, Political Reform Consultant. North American Pallet Association is a local general purpose committee. Alejandro Gonzalez Jimenez serves as the Committee's treasurer. The Committee

and Gonzalez Jimenez failed to timely file two semi-annual campaign statements, in violation of Government Code Section 84200 (2 counts). **Fine: \$1,057 (Tier One).**

In the Matter of Youth Power PAC, Sponsored by PowerCA Action, and Luis Sanchez; FPPC No. 23/728. Staff: Bridgette Castillo, Senior Commission Counsel. Respondents were represented by Andrew Werbrock of Olson Remcho. Youth Power PAC, Sponsored by PowerCA Action is a state general purpose committee. Luis Sanchez serves as the Committee's treasurer. The Committee and Sanchez failed to timely report subvendor payments on two pre-election campaign statements, in violation of Government Code Section 84211 subdivision (k)(6) (2 counts). **Fine: \$700 (Tier Two).**

In the Matter of Richmond District Democratic Club ("RDDC SMO"), Richmond District Democratic Club ("RDDC PAC"), Christine Randolph, and Margaret Cooley; FPPC No. 20/990. Staff: Cinthya Bernabé, Commission Counsel and Special Investigator Kaitlin Osborn. Richmond District Democratic Club is a slate mailer organization ("RDDC SMO") and local general purpose committee ("RDDC PAC"). Each committee has its own identification number. Margaret Cooley served as treasurer of the RDDC PAC. Christine Randolph and Margaret Cooley served as treasurers for the RDDC SMO. The RDDC PAC and Cooley failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count) and three semiannual campaign statements, in violation of Government Code Section 84200 (3 counts). The RDDC SMO, Randolph and Cooley failed to timely file eight semiannual campaign statements, in violation of Government Code Section 84218 (8 counts) and three 24-Hour Late Payment Reports, in violation of Government Code Section 84220 (3 counts). **Fine: \$268.**

In the Matter of California Voter Project; FPPC No. 19/1386. Staff: Theresa Gilbertson, Senior Commission Counsel and Alethea Perez, Special Investigator. California Voter Project was a general purpose committee. The Committee failed to timely file two 24-Hour Reports, in violation of Government Code Sections 84203 and 84204 (1 count). Further, the Committee failed to timely file a semiannual campaign statement, in violation of Government Code Section 84200 (1 count.) **Fine: \$6,500.**

In the Matter of Roseville Secondary Educators Association Political Action Committee, Aaron Weidkamp, and Marie Criste; FPPC No. 24/1017. Staff: Jaleena Evans, Commission Counsel. Roseville Secondary Educators Association Political Action Committee is a county general purpose committee. Aaron Weidkamp previously served as the Committee's treasurer and Marie Criste is the current treasurer. The Committee and its treasurers failed to timely file two pre-election campaign statements, in violation of Government Code Section 84200.5 (2 counts), failed to timely file four semiannual campaign statements, in violation of Government Code Section 84200 (4 counts), and failed to timely file five 24-Hour Reports, in violation of Government Code Section 84203 (5 counts). **Fine: \$3,483 (Tiers One and Two).**

In the Matter of Abundant Housing LA, a non-profit 501(c)(4); FPPC No. 21/500. Staff: Neal Bucknell, Senior Commission Counsel and Lance Hachigian, Supervising Special Investigator. The Respondent is represented by Emily Andrews of Olson Remcho LLP. Abundant Housing LA is a multi-purpose organization that qualified as a local general purpose

committee. The Committee failed to timely file a statement of organization to report its date of qualification, in violation of Government Code Sections 84101 and 84222, subdivision (e) (1 count); and failed to timely file a semiannual campaign statement, in violation of Government Code Sections 84200 and 84222, subdivision (e) (1 count). **Fine: \$502 (Tier One).**

Laundered Campaign Contributions

In the Matter of Douglas Treisman and Treisman for Judge 2020; FPPC No. 22/714. Staff: Marissa Corona, Senior Commission Counsel. This matter arose from an audit performed by the Franchise Tax Board's Political Reform Audit Program. Douglas Treisman was an unsuccessful candidate for Fresno County Superior Court Judge in the March 3, 2020 Primary Election. Treisman for Judge 2020 was Treisman's candidate-controlled committee. The Committee and Treisman caused Treisman's father to make a campaign contribution in the name of another, in violation of Government Code Section 84301 (1 count). **Fine: \$4,500.**

Advertisements

In the Matter of No on Ross Valley Schools Measure E Sponsored by the Coalition of Sensible Taxpayers and Ingrid Harris; FPPC No. 25/545. Staff: Jaleena Evans, Commission Counsel. No on Ross Valley Schools Measure E Sponsored by the Coalition of Sensible Taxpayers was a local primarily formed ballot measure committee. Ingrid Harris was the Committee's principal officer. The Committee and Harris failed to include the sponsoring committee's information in their website disclaimer and failed to include the proper advertisement disclaimers on four electronic media advertisements, in violation of Government Code Sections 84502 and 84504.3 (5 counts). **Fine: \$1,551 (Tier One).**

In the Matter of Palo Altans for Sensible Zoning and Timothy Gray; FPPC No. 21/168. Staff: Neal Bucknell, Senior Commission Counsel; and Jay Gehres, Special Investigator. Palo Altans for Sensible Zoning is a local general purpose committee that supported various candidates for Palo Alto City Council for the November 3, 2020 General Election. Timothy Gray was the Committee's treasurer. The Committee and Gray: failed to timely file a semiannual campaign statement, in violation of Government Code Section 84200 (1 count); failed to timely file a pre-election campaign statement, in violation of Government Code Section 84200.5 (1 count); and failed to timely file six 24-Hour Reports, in violation of Government Code Section 84204 (6 counts). Also, the Committee paid for ads, which failed to include the proper advertising disclosure, in violation of Government Code Section 84506.5 (4 counts). **Fine: \$835 (Tier One).**

In the Matter of Edward "Ty" Peabody; FPPC No. 24/641. Staff: Christopher B. Burton, Assistant Chief of Enforcement. Edward "Ty" Peabody, as a former City Councilmember of the City of Indian Wells, failed to include the proper disclosures on a mass electronic mailing, in violation of Government Code Section 84305 (1 count). **Fine: \$200 (Tier One).**

Legislation

AB 359 (Ramos) – Extension of Local Contracting Authority

Status: Passed in the Senate on 7/17/25 (35-0); passed in the Assembly on 8/25/25 (76-0); enrolled and presented to the Governor on 9/2/25

Short Summary: AB 359 would delete the sunset provision in the statute that authorizes the FPPC to contract with local government agencies, upon mutual agreement, to administer, implement, and enforce the agency's local campaign finance or government ethics laws.

Detailed Summary:

Existing law: Existing law authorizes the FPPC, upon mutual agreement with the governing body of a local government, to assume primary responsibility for the impartial, effective administration, implementation, and enforcement of a local campaign finance or government ethics law passed by the local government agency. Existing law includes a sunset provision that repeals this section on January 1, 2026, unless other legislation extends or repeals the sunset provision, and required the FPPC to submit a report to the Legislature on January 1, 2025, on the performance of any agreements entered under this section, which was timely submitted by the FPPC.

Current contracts: Pursuant to the authority in this section, the FPPC has one current contract with the City of San Bernardino.

Extend the authority indefinitely: AB 359 would delete the sunset provision, thereby extending the operation of the section indefinitely. The bill would also delete the expired reporting provision.

Clarify authority: Pursuant to the general authority granted to administer, implement, and enforce these local laws, the FPPC has interpreted the section to include authority to audit. For clarity, AB 359 would add explicit authority for the FPPC to conduct audits with regard to the local campaign finance or government ethics laws.

Repeals redundant section: Existing law authorizes the FPPC, upon mutual agreement with the County of San Bernardino, to assume primary responsibility for the impartial, effective administration, implementation, and enforcement of the county's local campaign finance reform ordinance. This authority is similar to the general authority to contract with local government agencies discussed above. AB 359 would repeal that section.

AB 808 (Addis) – Cal-Access Replacement System Clean-Up Bill

Status: Passed in the Senate on 9/12/25 (38-0); passed in the Assembly on 9/13/25 (79-0); enrolled and presented to the Governor on 9/24/25

Short Summary: AB 808 would make several conforming and streamlining amendments to sections in the PRA that become operative after the certification of the Cal-Access Replacement System by the Secretary of State.

Detailed Summary:

Background: Cal-Access is the statewide campaign finance and lobbying reporting platform, created and administered by the Secretary of State. The Cal-Access Replacement System, known as CARS, is currently in development and will be a modernized, data-driven filing and search system. Several sections of the PRA have been amended by prior legislation with delayed operative dates, set to take effect after CARS is certified by SOS.

Eliminates filing by fax: AB 808 would eliminate references to filing by fax in the PRA.

Eliminates references to form-based reporting practices: AB 808 would transition relevant sections of the Political Reform Act away from form-based and paper-based reporting terminology, including by deleting or replacing, as appropriate, references to “forms” and replacing “statement” with “report” throughout the Act. The bill would also streamline the committee registration process and replace “statement of organization” with the term “registration.”

Consolidates short form reporting: Existing law requires a candidate or officeholder who does not have a controlled committee and does not anticipate receiving contributions or making expenditures of \$2,000 or more to file a short form declaring that the candidate or officeholder anticipates receiving and spending under that threshold. AB 808 would eliminate the short form and would instead require that the candidate report this information on the Statement of Intention, required to be submitted before an individual becomes a candidate.

Clarifies when signature verification is needed: AB 808 would clarify for campaign finance reporting that verification is needed for semiannual and pre-election statements. This would clarify that, once CARS is certified, this verification is not needed for the 24-hour/10-day independent expenditure reports, consistent with current law.

Loan limit: In 2022, the Supreme Court found that limits on the repayment of candidate loans are unconstitutional. ([FEC v. Ted Cruz for Senate, 142 S. Ct. 1638](#)). AB 808 would repeal a provision in the PRA made unenforceable by that decision.

Updated copy of the PRA: Existing law requires the FPPC to annually publish a booklet that includes the provisions of the PRA. AB 808 removes the requirement to publish the PRA in a physical booklet, thereby enabling the FPPC to provide these materials exclusively electronically.

AB 953 (Pacheco and Alanis) – Preventing Foreign Interference in California Elections

Status: Passed in the Senate on 9/8/25 (39-0); passed in the Assembly on 9/9/25 (80-0); enrolled and presented to the Governor on 9/16/25

Short Summary: AB 953 would expand the existing prohibition on foreign governments and foreign principals making contributions, expenditures, and independent expenditures to apply additionally to foreign nationals.

Detailed Summary:

Existing federal law prohibits a foreign national from making a contribution, expenditure, or independent expenditure in connection with a federal, state, or local candidate election.

Existing state law further prohibits a foreign government or foreign principal from making a contribution, expenditure, or independent expenditure in connection with a state or local ballot measure. In California, “foreign principal” is defined for these purposes to include an individual who is “outside the United States” and is not a U.S. citizen. Because the definition of “foreign principal” in state law is centered on the location of the individual (outside the United States), state law would permit a foreign national to enter the country and make a contribution, expenditure, or independent expenditure in connection with a ballot measure, even though that person would be prohibited from making the contribution or expenditure if they were located outside of the United States.

Extension of the prohibition: AB 953 would prohibit a foreign national from making a contribution, expenditure, or independent expenditure in connection with a state or local ballot measure.

“Foreign national” defined: AB 953 would define “foreign national” to mean a person who is not a citizen of the United States and who is not a lawfully admitted permanent resident. This is the same definition used in federal law.

Exemption for DACA: AB 953 would exempt from the definition of “foreign national” a person who has been granted deferred action, and whose deferred action has not expired, under the federal Deferred Action for Childhood Arrivals (DACA) program, as described in guidelines issued by the United States Department of Homeland Security.

AB 789 (Bonta) – Use of Campaign Funds for Security Expenses

Status: Passed in the Senate on 9/12/25 (31-4); passed in the Assembly on 9/13/25 (65-6); enrolled and presented to the Governor on 9/24/25

Short Summary: AB 789 would permit elected officers and candidates to use campaign funds for security expenses subject to no limit until January 1, 2029, after which each elected officer or candidate would be subject to a cap of \$10,000 per calendar year. The bill would also clarify which family members cannot be paid with campaign funds for these purposes.

Detailed Summary:

Existing law: Existing law authorizes a candidate or elected officer to use campaign funds for the reasonable costs of installing and monitoring a home or office electronic security system or for

another tangible item related to security, and for the reasonable costs of providing personal security to a candidate, elected officer, or the immediate family or staff of a candidate or elected officer. Existing law imposes a lifetime cap of \$10,000 for these expenditures per elected officer or candidate. Existing law prohibits payments for these purposes to a relative, within the third degree of consanguinity, of a candidate or elected officer.

Eliminates cap: AB 789 eliminates the \$10,000 lifetime cap and instead provides that an elected officer or candidate may use campaign funds for security expenses subject to no limit until January 1, 2029, after which each elected officer or candidate would be subject to a cap of \$10,000 per calendar year for security expenses.

Clarification regarding prohibited expenditures for family members: AB 789 would clarify that campaign funds for these purposes cannot be used to pay the candidate's or elected officer's spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother-in-law, sister-in-law, nephew, niece, aunt, uncle, or first cousin or the spouse of any such person.

AB 1511 (Assembly Committee on Elections) – Transfer of Candidate Funds

Status: Passed in the Senate on 9/8/25 (39-0); passed in the Assembly on 9/10/25 (79-0); enrolled and presented to the Governor on 9/22/25

Short Summary: AB 1511 would revise the conditions under which a candidate who, before the primary election, raises campaign funds for the general election may transfer those general election funds to another candidate committee.

Detailed Summary:

Existing law: Existing law permits a state, county, or city candidate to raise contributions for a general or special general election before the primary or special primary election for the same office if those contributions are set aside and used for the general or special general election. Existing law requires the candidate to refund those general or special general election funds to the contributors if the candidate is defeated in the primary or special primary election or otherwise withdraws from the general or special general election.

Existing law: Existing law, as added by SB 948 (2024), provides that the above refund requirement does not apply to a candidate who does not file a declaration of candidacy to qualify for a primary or special primary election, and the candidate is not required to refund those contributions. Existing law permits these candidates to instead transfer those funds to a committee established for the same or a different office, subject to the attribution rules.

Expansion of transfer authority: AB 1511 would revise the above provision to instead permit a candidate to transfer general or special general election funds if (1) the candidate's name has not been listed on the ballot at a primary or special primary election, and (2) the candidate has not qualified to have write-in votes cast on their behalf counted by elections officials for nomination or election to an elective office at a primary or special primary election."

Corrections: AB 1511 corrects one citation to federal law in the PRA.

Voter information guide: AB 1511 would also change “ballot pamphlet” to “voter information guide” throughout the PRA.

SB 42 (Umberg, Allen, and Cervantes) – Public Campaign Financing

Status: Passed in the Assembly on 9/12/25 (59-20); passed in the Senate on 9/13/25 (29-8); enrolled and presented to the Governor on 9/23/25

Short Summary: SB 42 would generally permit the use of public money for the purpose of seeking elective office under certain conditions and restrictions. The bill would also make an unrelated change in the PRA to increase the maximum penalty for violations of the foreign contributions prohibition. The bill would be subject to voter approval at the November 2026 election.

Detailed Summary:

Existing law, public campaign financing: Existing law prohibits a public officer from expending, and a candidate from accepting, public money for the purpose of seeking elective office.

Legislative and legal history: In 2016, an exception was added to allow public funds to be used for campaigns under specific conditions. The 2016 exception was challenged and was declared void and unenforceable by a Superior Court decision and affirmed by the Court of Appeals in 2019 as an improper legislative amendment of a voter initiative.

Eliminates the prohibition: SB 42 would strike the general prohibition on using public funds for the purpose of seeking elective office.

Earmarked funds: SB 42 would prohibit the use of public funds for the purpose of seeking elective office if the funds are earmarked by any state or local entity for education, transportation, or public safety.

Conditions for receiving public funds: SB 42 would require candidates to abide by expenditure limits and meet “strict criteria,” set by statute, ordinance, or charter, to qualify for public funds. The bill requires that the criteria require candidates to demonstrate broad-based support in their district.

Prohibited use: SB 42 would prohibit public funds from being used to pay legal defense fees or fines, repay a personal loan to their campaign, or use of any source of funds to repay a personal loan to the campaign after the campaign ends.

Expenditure limits: SB 42 would authorize a statute, ordinance, or charter to increase the expenditure limits for each qualified, voluntarily participating candidate, subject to a specific restriction.

Prohibition on party, challenger, or incumbent preference: SB 42 would prohibit public funding statutes, charters, ordinances, and resolutions from discriminating based on party or according to whether a candidate is a challenger or an incumbent.

Enforcement: SB 42 would provide that the FPPC is not responsible for the administration or enforcement of a local system of public funding of candidates, unless the commission enters into a written agreement with the agency to do so.

Existing law, foreign contributions: Existing law prohibits a foreign government or foreign principal from making a contribution, expenditure, or independent expenditure in connection with a state or local ballot measure or the election of a candidate to state or local office. Existing law provides that a person who violates this prohibition shall be guilty of a misdemeanor and fined an amount equal to the amount contributed or expended.

Increasing the penalty: SB 42 would provide that a violation of the foreign contributions prohibition is subject to a fine of, at minimum, the amount contributed or expended, or up to three times the amount contributed or expended.

Future amendment of the section: SB 42 would provide that any amendments to this section must be approved by the voters, except that the following provisions may be amended by the Legislature with a 2/3 vote of each house:

- The provision defining several terms, including, among others, “expenditure limits” and “strict criteria.”
- The provision authorizing the Legislature or a local government to increase the expenditure limits for participating candidates.
- The provision that provides that the FPPC is not responsible for the administration or enforcement of a system of public funding of candidates established by a local government agency.

Voter approval: The bill would be submitted to the voters for approval at the November 3, 2026, statewide general election.

SB 760 (Allen) – Behested Payments Reporting Exemption for Public Appeals for Payment

Status: Passed in the Assembly on 9/12/25 (77-0); passed in the Senate on 9/13/25 (37-0); enrolled and presented to the Governor on 9/23/25

Short Summary: SB 760 would create an exemption to the behested payment reporting requirements for certain public appeals for payment, subject to certain limitations.

Detailed Summary:

Existing law: Existing law requires elected officers and members of the Public Utilities Commission to submit behested payment reports within 30 days following the date on which the behested payments from a single donor reach \$5,000 or more in the aggregate in a calendar year. Generally, a “behested payment” is a payment requested or solicited by an elected official that is

paid by one individual or organization to another individual or organization for a legislative, governmental, or charitable purpose.

Exemption to reporting: SB 760 would provide that no behested payment report is required if the officer or member makes a public appeal for payment by:

(A) Television.

(B) Radio.

(C) Billboard.

(D) A public message on an online platform.

(G) A public speech, unless the speech is given at an event that the officer or member knows is being held for the purpose of raising funds for the recipient organization and any of the following apply:

(i) The officer or member consents in advance to be a speaker.

(ii) The officer or member consents to be featured in a solicitation.

(iii) The officer or member publicly solicits contributions to the recipient organization.

Limit to exemption: SB 760 provides that the reporting exemption above does not apply if either of the following apply:

(A) The payee organization is not a governmental agency and the elected officer or member of the Public Utilities Commission knows that they, or a member of their immediate family, campaign staff, or officeholder staff, holds a position, including any of the following, with that payee organization:

(i) Any position with decision-making capacity within the organization, such as a board member or executive officer position.

(ii) Salaried employment at the organization.

(iii) Status as a founding member of the organization.

(iv) A position on an honorary or advisory board of the organization.

(B) The behesting officer or member knows, within two years of the payment, that a specific payment was made in response to the officer or member's public appeal.

Reporting deadline for delayed knowledge of payment: If an officer or member does not know at the time that a payment was made in response to their public appeal, the 30-day reporting deadline commences on the date that the officer or member first learns that the payment was made in response to that public appeal.