



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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Second Quarter Update 2026

Lobbying

Regulations adopted by the Commission.

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

None.

Advice Letters

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

Lobbying

Corinne Gibson – [A-26-016](#)

Members of an expert panel convened by the State Water Board are not qualifying officials, such that direct communications with the panel would require an individual to register as a lobbyist. However, compensation paid to a staff member to communicate with the panel to influence their recommendations to the State Water Board constitutes lobbying activity, which will be reportable if an organization meets the reporting threshold.

Jennifer McDonald – [I-26-052](#)

Once an organization qualifies as a lobbyist employer, all "other payments to influence" must be reported unless they fall specifically under an exception. Reading Sections 82002 and 82039 together, compensation paid by the lobbyist employer to an individual for the purpose of influencing legislative or administrative action is reportable even if that individual does not qualify as a lobbyist under the Act. Separate invoicing and timekeeping, consistent with the Act's lobbyist employer and lobbying firm accounting requirements, is generally sufficient to allocate compensation between lobbying activity and PUC testimony services. The Act does not require reporting of compensation related to the preparation of written testimony, even if prepared for a public hearing. Payments in connection with administrative testimony in ratemaking proceedings before the PUC, other than payments to a lobbyist or a lobbying firm, must be reported as lump sum payments in Section E. Payments made to a lobbyist or a lobbying firm in connection with PUC ratemaking proceedings must be reported in Part III, Section A or B of Form 634. The lobbying firm's reciprocal reporting on Form 625 should mirror the lobbyist firm employer's characterization of the same payments for the same services.

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 lobbying laws. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

None.

Legislation

[AB 1736](#) (Pellerin) – “Astroturfing” Prohibition for Lobbyist Employers

Short Summary: AB 1736 would prohibit lobbyist employers from creating a fictitious appearance of public favor or disfavor of any proposed legislative or administrative action or sending a communication to certain public officials in the name of any fictitious person, or in the name of any real person without their consent.

Detailed Summary:

Existing law: The PRA imposes various prohibitions on lobbyists and lobbying firms, including a prohibition on “attempt[ing] to create a fictitious appearance of public favor or disfavor of any proposed legislative or administrative action or [causing] any communication to be sent to any elected state officer, legislative official, agency official, or state candidate in the name of any fictitious person or in the name of any real person, except with the consent of such real person.”

Extends the prohibition to lobbyist employers: AB 1736 extends the above prohibition to additionally apply to lobbyist employers.

[AB 2592](#) (Pacheco) – Transfer of Lobbyist Training to the FPPC

Short Summary: Starting January 1, 2029, AB 2592 would transfer the lobbyist training duty from the Legislative Ethics Committees to the FPPC.

Detailed Summary:

Existing law: Existing law outside of the PRA requires the legislative ethics committees to conduct an orientation course on the relevant ethical issues and laws relating to lobbying, in consultation with the FPPC, at least semiannually. Existing law provides that the legislative ethics committees shall impose fees on lobbyists for attending the course, set at an amount that will enable the lobbyists' participation in the course to be funded from those fees to the fullest extent possible. That fee is currently set at \$50.

Transfer of the training duty: Starting January 1, 2029, AB 2592 would transfer the lobbyist training duty to the FPPC. The bill would require that the course curriculum be developed in consultation with the legislative ethics committees and that the committees have final approval over the content of the course that relates to the legislature's policies against harassment, including sexual harassment.

On-demand: AB 2592 would require that the course is available on-demand through an online platform, internet webpage, or application.

Funding: AB 2592 would provide that the fee for the training is \$50, subject to a biennial cost of living adjustment rounded to the nearest \$10. The bill would also provide that unused funds collected by the joint legislative ethics committees from lobbyists for the course shall be transferred to the FPPC for the purpose of developing the course.

SB 401 (Hurtado) – PRA Filing Deadline Extensions in Emergency Situations

Short Summary: SB 401 would authorize the commission to extend filing deadlines in the PRA for individuals impacted by a state or local emergency.

Detailed Summary:

Existing law: The PRA imposes deadlines for filing various reports and statements under the PRA, including statements of economic interests, lobbying reports, behested payment reports, and campaign reports and statements.

New authority: SB 401 would authorize the Commission to extend any filing deadline under the PRA for individuals that live in an area impacted by an emergency proclaimed by the Governor or a local governing body pursuant to specified authority, if the emergency situation is reasonably likely to affect the individual's ability to timely file.

Maximum extension: SB 401 would provide that any filing extension granted by the commission may be no more than 60 days from the original filing deadline.

Does not apply to campaign filings near the election: The authority to grant an extension would not apply to filing deadlines for campaign statements or reports during the 90 days before an election.

AB 1560 (Tangipa) – Lobbyist Certification

Short Summary: AB 1560 would prohibit a person from acting as a lobbyist if the person has been convicted of a crime of public corruption, as defined.

Detailed Summary:

Existing law; "lobbyist" defined: The PRA generally defines a lobbyist as an individual who receives \$2,000 or more in economic consideration in a calendar month, or whose principal

duties as an employee are, to communicate directly or indirectly with any elective state official, state agency official, or legislative official for the purpose of influencing legislative or administrative action.

Existing law; lobbyist certification: The PRA requires each individual lobbyist to submit a lobbyist certification with the SOS.

“Crime of public corruption” defined: For purposes of the bill, “crime of public corruption” means a felony involving accepting or giving, or offering to give, any bribe, the embezzlement of public money, extortion or theft of public money, perjury, or conspiracy to commit any of those crimes.

New prohibition: AB 1560 would prohibit a person who is convicted of a crime of public corruption from acting as a lobbyist for 12 years following the date of the conviction.

Lobbyist certification: AB 1560 would require that the lobbyist certification include a statement that the lobbyist has not been convicted of a crime of public corruption within the previous 12 years.

SOS duty: AB 1560 would prohibit the SOS from accepting a lobbying certification from a person who has been convicted of a crime of public corruption within the previous 12 years. If a person convicted of a crime of public corruption is already a registered lobbyist, the bill provides that the lobbyist certification shall be void upon the person’s conviction.

SB 1175 (Rubio) – Filing of Lobbyist Registration and Termination

Short Summary: SB 1175 would enable lobbyists to file amended lobbyist certifications or notices of termination directly with the Secretary of State (SOS).

Detailed Summary:

Existing law: The PRA provides that if any change occurs in any of the information contained in a lobbyist certification or if a lobbyist terminates all activity that required the certification, the lobbyist must submit an amended certification or notice of termination to the lobbyist’s lobbying firm or lobbyist employer for filing with SOS.

Enabling direct filing: SB 1175 would instead require that an amended lobbyist certification or notice of termination be filed by the lobbyist directly with SOS.

Urgency clause: SB 1175 would take effect immediately upon signing by the Governor.

SB 1432 (Senate Elections Committee) – PRA Committee Bill

Short Summary: SB 1432 would make several minor and clarifying changes to the PRA.

Detailed Summary:

Existing law – invitations from lobbyists: Existing law requires lobbyists, lobbying firms, and lobbyist employers who send any written or printed invitation to an elected state officer, candidate for elective state office, legislative official or agency official, to include on the invitation or on a letter attached to the invitation a statement that “Attendance at this event by a public official will constitute acceptance of a reportable gift.” The statement must be at least as large and readable as 8-point Roman boldface type.

Increase type size requirement: SB 1432 would increase the minimum type size to 10-point.

Existing law – FPPC position classification titles: Existing law provides that a nonclerical position under the Commission shall not be included in the same class in the civil service classification plan with any position of any other department or agency.

Position classifications: SB 1432 would repeal that prohibition and instead authorize the Commission to include a nonclerical position in a class in the civil service classification plan that is separate and distinct from any position of any other department or agency.

Corrections: SB 1432 also makes other corrections.