



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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First 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](#).

None.

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](#).

Lobbying Reporting

[In the Matter of Charlotte's Web Inc; FPPC No. 26/087.](#) Charlotte's Web Inc. is a lobbyist employer and was registered for the 2019-2020 legislative session. Charlotte's Web Inc failed to timely file one lobbyist employer report, in violation of Government Code Section 86117 (1 count). **Fine: \$425 (Tier One).**

[In the Matter of Transportation Workers Union; FPPC No. 26/088.](#) The respondent is represented by Denis A. Engel of Colleran, O'Hara & Mills LLP. Transportation Workers Union is a lobbyist employer and was registered for the 2019-2020 legislative session. Transportation

Workers Union failed to timely file one lobbyist employer report, in violation of Government Code Section 86117 (1 count). **Fine: \$320 (Tier One).**

[In the Matter of Creative Artists Agency LLC and Tammy Brandt; FPPC No. 26/096.](#)

Creative Artists Agency LLC is a lobbyist employer and was registered for the 2025-2026 legislative session. Tammy Brandt is the organization's Chief Compliance Officer and Responsible Officer. Creative Artists Agency failed to timely file one lobbyist employer report, in violation of Government Code section 86117 (1 count). **Fine: \$300 (Tier One).**

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.

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.

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.

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.

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.

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. 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 1159 (Cabaldon) – Excluding AI from the Definition of “Person” and Related Terms

Short Summary: SB 1159 would provide that, for the purposes of the PRA, and other specified areas of law, the terms “person,” “interested person,” “participant,” “member of the public,” as applicable, and any other similar terms under each area of law referring to those who may engage with governmental agencies, do not include artificial intelligence systems, autonomous agents, robots, or other nonhuman entities, whether physical or digital.

Detailed Summary:

Existing law: The PRA defines “person” to mean an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, limited liability company, association, committee, and any other organization or group of persons acting in concert.

Exclusions to the definition of “person” and related terms: SB 1159 provides that, for the purposes of the PRA, CPRA, Bagley Keene, the Administrative Procedures Act, the Brown Act, and CEQA, “the terms ‘person,’ ‘interested person,’ ‘participant,’ ‘member of the public,’ as applicable, and any other similar terms under each act referring to those who may engage with governmental agencies, do not include artificial intelligence systems, autonomous agents, robots, or other nonhuman entities, whether physical or digital.

Definition: For purposes of the bill, “artificial intelligence” is defined to mean an engineered or machine-based system that varies in its level of autonomy and that can, for explicit or implicit objectives, infer from the input it receives how to generate outputs that can influence physical or virtual environments.

Clarification needed: Because the definition of “person” under the PRA includes business entities, committees, organizations, and other “nonhuman entities,” amendments are likely needed to ensure that the bill does not inadvertently affect duties and authority under the PRA.

Note: In its current form, SB 1159 does not directly amend the PRA, but amends definitions in the PRA through reference to PRA sections. Amendments are planned to amend the PRA and other areas of code directly.

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 increase the minimum text size of a statement that must be printed on invitations to elected state officers from lobbyists, lobbying firms, and lobbyist employers.

Detailed Summary:

Existing law: 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.