



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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First Quarter Update 2026

Ethics – Gifts, Honorarium, and Travel

Regulations adopted by the Commission

The following are regulatory changes approved by the Commission during the past quarter concerning gifts, honorarium, and travel. 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 questions about gifts, honorarium, and travel. To receive the monthly report with all advice letters issued, please sign up for our [mailing list here](#).

Gifts

Steve Mattas – [A-25-162](#)

Based on the facts provided, payments for meals and beverages by a source introduced to the councilmember by the city attorney and made while engaged in informal discussions involving the source's developable property were not based on a social relationship. Thus, the payments are gifts that do not meet any exception and are reportable for the calendar year in which the gifts reached a value of \$50 from the source. However, to the extent that the gifts were made over 12 months prior to the decision before the councilmember and no further gifts are made, the councilmember does not have a disqualifying interest in subsequent decisions that may have a financial effect on the source of the gifts.

Commission Opinions

None.

Enforcement Matters

The following are summaries of significant enforcement actions approved by the Commission in the past quarter concerning gifts, honorarium, and travel. To receive a monthly report of all enforcement actions, please sign up for our [mailing list here](#).

None.

Legislation

AB 1788 (Boerner) – Enhanced Disclosure for Nonprofit Organizations that Pay for Elected Official Travel

Short Summary: AB 1788 revises and clarifies the reporting threshold for nonprofit organizations that pay for travel expenses for elected officials, enhances disclosure, and imposes related recordkeeping requirements.

Detailed Summary:

Existing law: The PRA requires a nonprofit organization that made travel and travel-related payments greater than 1/3 of its total expenses, as reported on the organization's Internal Revenue Service Form 990, and that made payments, advances, or reimbursements for elected official travel that total more than \$10,000 per year, or more than \$5,000 per year for a single official, to disclose the names of donors to the nonprofit organization who donated at least \$1,000 and accompanied the official on their travel during the preceding year.

Report by Audit Division:

- In May 2023, CalMatters reported that nonprofits paying for official travel had only filed two Form 807s since the reporting requirement went into effect in 2016. The Commission subsequently directed the Audits & Assistance Division to conduct an audit of entities that may be subject to this reporting obligation. The purpose of the audit was to gather information regarding the application of the current reporting requirements that could assist in evaluating the effectiveness of those requirements and what steps the Commission and Legislature should take to improve compliance.
- The Audits and Assistance Division conducted 10 discretionary audits of nonprofit organizations. The report is available [here](#).
- The 10 nonprofit organizations were selected because public officials had reported receiving gifts of travel from those organizations on the public officials' Form 700s. Of the 10 selected, 8 had not filed a Form 807, and 2 had filed the form for either 2021 or 2022. The Audit Division found that 8 of the nonprofit organizations did not meet the reporting threshold in existing law that requires reporting only if the nonprofit organization's total travel and travel-related payments are greater than 1/3 of its total expenses, as reported on the organization's Internal Revenue Service Form 990.
- The Audits and Assistance Division made recommendations for legislative changes, which serve as the basis for this bill.

Revised reporting threshold: AB 1788 would eliminate the threshold that requires reporting only if the nonprofit organization's travel and travel-related payments are greater than 1/3 of its total expenses, as reported on the organization's Internal Revenue Service Form 990. The bill would instead require reporting if the nonprofit makes expenditures for travel for elected officials of \$10,000 or more per year, or \$5,000 or more per year for a single elected official.

Enhanced disclosure: AB 1788 requires disclosure of each travel expenditure and the name of the official for whom the expenditure was made.

Recordkeeping: AB 1788 adds recordkeeping requirements that mirror the standard recordkeeping requirements for other entities under the PRA.

AB 2413 (Ransom) – Large-Format Public Advertisements at the Public Expense

Short Summary: AB 2413 would prohibit certain large-format public advertisements from being published or displayed using public money if the ad includes a photograph of an elected official affiliated with the agency that paid for the ad.

Detailed Summary:

Existing law: The PRA has specific rules concerning the sending of mass mailings at the public expense that mention public officials. With some exceptions, the PRA prohibits the individual distribution of more than 200 copies of substantially similar items in a calendar month if the items include the name, office, photograph, or other reference of an elected official.

New prohibition: AB 2413 would prohibit a "large-format public advertisement" from being published or displayed at the public expense if both:

- The ad includes the photograph of an elected officer affiliated with the agency and the ad was prepared in cooperation, consultation, coordination, or concert with the elected officer.
- The costs of distribution of the advertisement are paid for with public money, or the costs of design, production, and printing are paid for with public money, and the design, production, or printing is done with the intent of publishing or displaying the advertisement.

Definition: AB 2413 defines "large-format public advertisement" to include:

- A billboard.
- Wrap on a bus or other public transportation vehicle.
- Advertisements affixed to a bus stop or other public infrastructure.
- Other public advertisements that are larger than those designed to be individually distributed and that are specified by regulation.

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.