



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

**To:** Chair Silver, Commissioners Brandt, Ortiz, and Wilson

**From:** Galena West, Executive Director  
Dave Bainbridge, General Counsel

**Subject:** **Regulation Projects Schedule for 2026**

**Date:** March 9, 2026

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**Introduction**

Fair Political Practices Commission (“Commission”) staff proposes the following schedule for regulatory changes by the Commission in 2026. The general topic for each new regulation project and the proposed meeting at which staff will present it to the Commission are listed below. The proposed new projects were presented to the Commission at its January 2026 Commission meeting for discussion and comment. The scope and specific issues addressed in each regulation project described below may change during the process.

The proposed projects are based on prior direction from the Chair and Commissioners, as well as recommendations from staff and the public. The schedule may require revision during the year in the event of circumstances requiring immediate Commission action, changes in Commission priorities, legislative actions, staffing changes, or other unforeseen circumstances. Additional regulatory projects may be added upon the Commission's direction or as otherwise needed.

In most instances, a regulation project will be presented to the Commission at a meeting for pre-notice to allow for Commission and public comment and discussion. After the pre-notice meeting, staff may revise the regulations based on input provided, and submit it to the Office of Administrative Law pursuant to the Administrative Procedures Act. Typically, two months after the pre-notice meeting, staff will present the regulations to the Commission for final consideration and adoption. The Law and Policy Committee, at its discretion, may meet to review, discuss, take public comment, and make recommendations on any regulatory proposals before the item is presented to the Commission.

The purpose of the regulation schedule is to provide Commissioners, staff, and the public advance notice of potential upcoming regulatory changes. Staff encourages interested parties to provide input early so that staff may consider it during the drafting process. Upon approval by the Commission, the regulatory calendar will be posted on the Commission’s website and will be updated as necessary.

## Project Summaries

### **Pending**

**Probable cause proceedings** – Amend Regulation 18361.4<sup>1</sup> to make the probable cause process more efficient and lessen unnecessary delays in conducting probable cause proceedings.

**Enforcement penalties** – Amend “streamline” Regulations 18360.1 – 18360.3 to clarify Enforcement’s discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced penalty, require the Commission to directly approve streamline fines, and consider existing inclusion and exclusion criteria.

### **New**

**AI Disclaimers on advertisements** – Adopt a new regulation interpreting the disclaimer requirement in Section 84514<sup>2</sup> for certain campaign advertisements generated or substantially altered using AI. Also, amend Regulation 18401 to provide specific guidance on the application of the Act’s recordkeeping requirement to committee advertisements, including advertisements subject to the disclaimer requirement in Section 84514.

**SEI filing requirements for officials holding multiple positions** – Amend existing Regulation 18723.1 to clarify statement of economic interest (SEI) filing requirements for officials holding multiple positions, specifically officials who hold a position listed in Section 87200, as well as a position included under Section 87300.

**Combined campaign statements and reports**– Adopt a regulation pursuant to Section 84205 permitting candidates and committees to file combined campaign statements and reports in instances where reporting periods overlap and combining those periods will not reduce or delay disclosure.

**Cryptocurrency as a reportable financial interest** – Amendment existing regulations to conform with Commission-sponsored AB 1029, which revised the Act’s statutory definition of “investment” to include “digital financial assets” such as cryptocurrency.

**Economic interest in affiliated non-profit organizations** – Adopt a regulation addressing the question at issue in the *In re: Winuk Opinion*, No. O-25-001 of when an economic interest in one non-profit organization results in an interest in an affiliated organization for purposes of the Act’s conflict of interest rules.

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<sup>1</sup> The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations.

<sup>2</sup> The Political Reform Act (“Act”) is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated.

**Reporting behested payments as other payments to influence (OPTI)** – Amend Regulation 18616 to specify that behested payments disclosable under Section 84224 are required to be reported by a lobbyist employer making the behested payment as an “other payment to influence legislative or administrative action” on quarterly lobbying reports.

**Cal-Access Replacement System (CARS) updates** – Amend numerous regulations to reflect statutory changes that go into effect when the new Cal-Access filing system “goes live” in late 2026, as well as adopt new regulations and/or amend existing regulations to address items requiring clarification that have arisen during the development of the new filing system.

**COLA** – Amend various regulations to reflect biennial cost-of-living adjustments required by statute.

\*For additional information on the new regulation projects, see [Regulation Projects for 2026 memo](#), Agenda Item 9 at the Commission’s January 2026 meeting.

**Regulation Schedule**

<b>Commission Meeting</b>	<b>Pre-notice</b>	<b>Adoption</b>
January		
February		
March		Probable cause proceedings
April	Enforcement penalties AI disclaimers on ads	
May	Combined campaign statements and reports SEI filing requirements for officials holding multiple positions	
June		Enforcement penalties AI disclaimers on ads
August	Cryptocurrency as a reportable financial interest	Combined campaign statements and reports SEI filing requirements for officials holding multiple positions
September	CARS updates Reporting behested payments as OPTI	
October	Economic interest in affiliated non-profit organizations	Cryptocurrency as a reportable financial interest
November		CARS updates

		Reporting behested payments as OPTI COLA
January 2027		Economic interest in affiliated non- profit organizations