



# California Fair Political Practices Commission

November 5, 1993

Catherine Barankin  
California Coalition for Children's  
Safety & Health  
400 Capitol Mall, Suite 900  
Sacramento, CA 98514

Re: Your Request for Advice  
Our File No. A-93-368

Dear Ms. Barankin:

You have requested advice concerning the lobbying disclosure provisions of the Political Reform Act.<sup>1/</sup>

## QUESTION

Does the California Coalition for Children's Safety and Health (the "Coalition") qualify as a lobbying coalition by hiring Sacramento Advocacy, a lobbying firm, to perform administrative work?

## CONCLUSION

The Coalition does not qualify as a lobbying coalition; therefore, it is not required to register.

## FACTS

The Coalition, which is an on-going organization consisting of representatives from insurance companies, children advocacy groups, and consumer safety organizations, hired Sacramento Advocacy, a registered lobbying firm and management company, to perform the administrative work for the Coalition. Each member of the Coalition employs its own lobbyist or lobbying firm to represent its own particular lobbying interests.

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<sup>1/</sup>Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

Catherine Barankin  
A-93-368  
page 2

ANALYSIS

Regulation 18616 defines a "lobbying coalition" as:

A group of 10 or more persons formed primarily to influence legislative or administrative action, whose members make payments to the coalition for the purpose of sharing the expenses of employing a lobbyist or contracting for the services of a lobbying firm.

Because the Coalition is not primarily formed to influence legislative or administrative action, and does not compensate Sacramento Advocacy to lobby on its behalf, it is not required to register as a lobbying coalition.

If you have any questions, please contact me at  
(916) 322-5662.

Sincerely,

Steven G. Churchwell  
General Counsel

by: Colleen McGee  
Political Reform Consultant  
Technical Assistance Division