



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

TITLE 2. FAIR POLITICAL PRACTICES COMMISSION

NOTICE IS HEREBY GIVEN that the Fair Political Practices Commission (the Commission), under the authority vested in it under the Political Reform Act (the Act)¹ by Section 83112 of the Government Code, proposes to adopt, amend, or repeal regulations in Title 2, Division 6 of the California Code of Regulations. The Commission will consider the proposed regulations at a public hearing on or after **November 19, 2026**, at the offices of the Fair Political Practices Commission, 1102 Q Street, Suite 3050, Sacramento, California, commencing at approximately **10:00 a.m.** Written comments should be received at the Commission offices no later than **5:00 p.m.** on **November 16, 2026**.

BACKGROUND/OVERVIEW:

In response to the new CAL-ACCESS campaign and lobbying filing system that is being implemented by the Secretary of State, and related legislation that will go into effect once that system is certified, several regulatory changes are proposed.

In November 2026, the new CAL-ACCESS filing system will be certified, providing the public and regulated community with a new online system for submitting and viewing state campaign finance and lobbying disclosure reports. This will be a new data-driven system replacing the existing forms-driven system. The new version of CAL-ACCESS will provide users with a more efficient, sustainable system that is flexible, easier to use, and allows greater transparency into campaign and lobbying activity.

In anticipation of this new system, the California Legislature has passed bills, including Senate Bill 1239 [Stats. 2018, Ch. 662], Assembly Bill 909 [Stats. 2019, Ch. 313], and Assembly Bill 808 [Stats. 2025, Ch. 278], which will amend numerous statutes under the Political Reform Act. Consequently, this will require amendments to the FPPC's regulations.

REGULATORY ACTION:

The following changes are proposed in order to align with the new CAL-ACCESS system and statutory changes referenced above:

¹ The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. 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, unless otherwise indicated.

- Amend 2 Cal. Code Regs. Section 18110 (Duties of Filing Officers – Campaign Reports): to reference “campaign reports” instead of “campaign statements.” Make minor grammatical edits throughout. Include duty to review for “email address” for specified filers, duty to review for dates of expenditures along with the amount and a description of the expenditure, and whether a contribution is made in monetary form or in-kind. Removing reference to other committees controlled by the same candidate. Include other non-substantive clarifying language.
- Amend 2 Cal. Code Regs. Section 18313 (Forms, Reports and Manuals): to include reference to “reports” in the process whereby the Commission shall notice and make any changes to formats for reporting information required under the Act. Also include a reference to “reports” and “other documents required under the Act” for the process where the Commission maintains a list of those persons interested in Commission documents.
- Amend 2 Cal. Code Regs. Section 18402.1 (Principal Officers): to include requirement that committees disclose email addresses of principal officer(s) in committee registration. Change references to “statement of organization” to “committee registration.”
- Amend 2 Cal. Code Regs. Section 18405 (Candidates with Multiple Controlled Committees): Currently, candidates with multiple controlled committees in different jurisdictions must file semi-annual and preelection reports for all controlled committees on the same timeline as any single committee which may trigger. In addition, the candidate files the original campaign report with the relevant jurisdiction and files a copy of the campaign report with the other jurisdiction(s). For example, a candidate for Assembly who is a sitting city council member with an open committee for both offices would file an original report with the Secretary of State for the Assembly committee, and a copy of that report with the city clerk. As the new CAL-ACCESS system will be unable to accept paper copies of filings, the proposed amendments remove the requirement to file *a copy* of any original report with a different jurisdiction. All committees must still file original campaign reports with the relevant jurisdiction(s) as required.
- Amend 2 Cal. Code Regs. Section 18406 (Candidates or Officeholders Who Receive and Spend Less than \$2,000 in a Calendar Year): to remove provisions related to short form campaign statements. Specify that those candidates who indicate on their Statement of Intention to be a Candidate that they will remain below \$2,000 are not required to file semi-annual or preelection reports.
- Amend 2 Cal. Code Regs. Section 18410 (Statement of Organization): to include the requirement that the statement include the treasurer’s email address, as well as acknowledgments by the committee treasurer and assistant treasurer pursuant to new Section 84102(d) from Assembly Bill 909 [Stats. 2019, Ch. 313]. Also, change references to “statement of organization” to “committee registration.”

- Adopt 2 Cal. Code Regs. Section 18421.12 (Candidate Personal Loans): to specify that personal loans of a candidate made to their own controlled committee for elective office must disclose both the candidate and any commercial lending institution (if applicable) as the source of the loan.
- Repeal and Adopt 2 Cal. Code Regs. Section 18422.5 (Top Contributor Disclosure by Committees Primarily Formed for State Ballot Measures or Candidates): Current Regulation 18422.5 contains provisions about how the Commission maintains and posts campaign committee Top 10 contributor lists online. This responsibility will shift to the Secretary of State's office, which will be responsible for maintaining and posting such lists through the new CAL-ACCESS system. Therefore, this regulation is proposed to be repealed, and the new proposed regulation for adoption lays out the new process for how those lists will be generated, maintained, and displayed by the Secretary of State's office.
- Amend 2 Cal. Code Regs. Section 18465 (Disclosure of Lobbying Entity Identification Numbers): Given that all state lobbyists/firms/employers/coalitions are required to file their lobbying reports electronically (rather than those who exceed a certain threshold), Regulation 18465 (requiring disclosure of lobbying identification number in lobbying report) is proposed to be amended to remove subdivision (b), which currently states, "the requirements of this section are not applicable to reports filed on paper." Other non-substantive amendments are also proposed.
- Repeal 2 Cal. Code Regs. Section 18465.1 (Verification of Online Filers): Regulation 18465.1 currently includes a presumption of filing under penalty of perjury by a campaign committee's vendor/service provider, which now needs to be removed from the regulation because it has been codified in statute. The regulation's other provision, pertaining to the filing deadline for a verification on a separate form concerning an independent expenditure, is also no longer necessary, as the verification will now be included on campaign reports per SB 1239's amendment to Section 84213(b). Therefore, Regulation 18465.1 is proposed to be repealed.
- Amend 2 Cal. Code Regs. Section 18520 (Statement of Intention To Be a Candidate): to state that before becoming a candidate for a specific office, an individual must file a Statement of Intention. Proposed amendments also provide that candidates who have indicated they do not intend to qualify as a committee need not amend or refile their Statement of Intention unless they reach the qualification threshold.
- Repeal 2 Cal. Code Regs. Section 18530.8 (Personal Loans): Regulation 18530.8 currently includes various provisions related to the application of the \$100,000 candidate personal loan limit. In light of the removal of this provision from the statute, these provisions are no longer necessary. The requirement that a candidate obtaining a loan from a commercial lending institution disclose both themselves and

the lending institution as the source of the loan will be moved to proposed Regulation 18421.12. Therefore, this regulation is no longer necessary and is proposed to be repealed.

- *Amend 2 Cal. Code Regs. Section 18603 (Lobbyist Certification and Ethics Course)*: to clarify that after filing an initial lobbyist certification, any subsequent filing is a renewal, even if there is a break in time of lobbying activity of the filer. The proposed amendments also address timelines for completion of the lobbyist ethics course and certification of completion of this course.
- *Repeal 2 Cal Code Regs. Section 18603.1 (Lobbyist Ethics Orientation Course)*: The information currently found in this regulation is proposed to be moved to Regulation 18603 so that the ethics course requirement is addressed in the same regulation as other information pertaining to the certification. Therefore, this regulation is proposed to be repealed.
- *Amend 2 Cal Code Regs. Section 18611 (Lobbyist Reporting)*: to provide that contributions of \$100 or more must also be reported if they are made to committees primarily formed to oppose officers/candidates. (Note: although Regulation 18611 derives from Section 86113 (pertaining to periodic reports by lobbyists), which has not been amended by SB 1239, AB 909, or AB 808, Section 86113 requires lobbyists to submit their reports to their lobbyist firms/employers, which are now specifically required under Sections 86114 and 86116 to report contributions to committees primarily formed to oppose officers/candidates. Accordingly, this amendment of Regulation 18611 is necessary to ensure accurate reporting.
- *Amend 2 Cal Code Regs. Section 18613 (Lobbying Firm Reporting)*: to provide that contributions of \$100 or more must also be reported if they are made to committees primarily formed to oppose officers/candidates. Other non-substantive amendments are also proposed.
- *Amend 2 Cal Code Regs. Section 18616 (Reports by Lobbyist Employers and Persons Spending \$5,000 or More to Influence Legislative or Administrative Action)*: to provide that contributions of \$100 or more must also be reported if they are made to committees primarily formed to oppose officers/candidates.
- *Amend 2 Cal Code Regs. Section 18616.4 (Reports by Lobbying Coalitions Which Are Lobbyist Employers; Reports by Members of Lobbying Coalitions)*: to require that reports by lobbying coalitions include the email address of each member (in addition to the name and business address already required) and the email address of the lobbying coalition (in addition to name and business address) on reports filed by employers/firms that are a part of a lobbying coalition. Amendments are also proposed to accommodate the electronic format in which these reports will be filed under the new CAL-ACCESS system.

SCOPE: The Commission may adopt the language noticed herein, or it may choose new language to implement its decisions concerning the issues identified above or any related issues.

FISCAL IMPACT STATEMENT:

Fiscal Impact on Local Government.	None.
Fiscal Impact on State Government.	None.
Fiscal Impact on Federal Funding of State Programs.	None.

AUTHORITY: Section 83112 provides that the Fair Political Practices Commission may adopt, amend, and rescind rules and regulations to carry out the purposes and provisions of the Act.

REFERENCE: Section 84205, Government Code.

CONTACT: Any inquiries should be made to Erika M. Boyd, Fair Political Practices Commission, 1102 Q St., Suite 3050, Sacramento, CA 95811; email: eboyd@fppc.ca.gov. The proposed regulatory language can be accessed at <http://www.fppc.ca.gov/the-law/fppc-regulations/proposed-regulations-and-notices.html>.