

California Enhances Lobbying Disclosure Requirements for Lobbyist Employers and “\$5,000 Filers”

January 25, 2016

The California Fair Political Practices Commission (“FPPC”) [by unanimous vote](#) on January 21, 2016 [revised](#) its regulation governing the disclosure of lobbying expenditures by lobbyist employers and so-called “\$5,000 filers.” ***These more comprehensive disclosures will be required with first-quarter reports, due no later than April 30, 2016.***

Under the new regulation, such organizations (but not lobbyists or lobbying firms) must now provide an itemized disclosure of expenditures currently disclosed on Form 635 (lobbyist employers) and Form 645 (\$5,000 filers) in a single lump-sum as “other payments to influence” legislative or administrative action. Instead, such payments totaling \$2,500 or more during the reporting period to a single payee must now be itemized and include the following information:

- The name and business address of the payee;
- Total payments made to the payee during the reporting period;
- The cumulative amount paid to the payee during the calendar year; and
- A payment code describing the primary purpose of the payment as one of the following:
 - Salary related to lobbying provided to non-lobbyists engaged in lobbying for 10 percent or more in a month;
 - Lobbyist expenses;
 - Legislative related-services;
 - Consultants and government relations;
 - Public affairs;
 - Advertising;
 - Research;
 - Lobbying events; or
 - Other.

Overhead expenses allocable to influencing legislative or administrative action must still be reported in a

lump-sum under “other payments to influence” on Form 635 (lobbyist employers) or Form 645 (\$5,000 filers), but now must also be reported on Form 640 as “overhead expenses.”

The new disclosures must be made on a [yet-to-be-finalized form](#) that will be a modified version of the disclosure form ([Form 640](#)) currently used by state and local government agencies to disclose such lobbying expenditures in an itemized fashion. These more comprehensive disclosures will be required with first-quarter reports, due no later than April 30, 2016.

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