

## **Understanding California Lobbying Disclosure Rules: Do they Apply to You?**

In addition to complying with the [federal tax rules](#) governing lobbying, nonprofits working in California need to keep state lobbying requirements in mind. California state-level lobbying is governed by the California Political Reform Act (CPRA) and regulated by the Fair Political Practices Commission (FPPC). For more detailed information on the CPRA and lobbying disclosure in California, read our publication [Shaping the Future: A Compliance Guide for Nonprofits Influencing Public Policy in California](#).

### **Not All Entities Will Need to Report**

Organizations that have only occasional contacts at the state level (having periodic meetings with members or staff, or sending infrequent letters to the Legislature or state administrative agencies) will not need to register under the CPRA. Just because an organization engages in lobbying at the state level in California does not necessarily mean it will have a reporting obligation under state law. The thresholds are designed to require only those organizations with sustained lobbying activities and expenses to file. This is because the purpose of the CPRA is to shine a light on the state lobbying activities of paid lobbyists and entities spending money to influence state legislation or regulations.

An organization that employs at least one “lobbyist” (as that term is defined in the CPRA) must register with the Secretary of State. A registrant must thereafter file a report every three months that discloses how much it spent on state-level lobbying; the bills, regulations and other matters on which the organization lobbied; payments to lobbyists; and details on gifts (if any) the organization made to covered state officials. These reports must be filed even in reporting periods when the organization does not have any lobbying expenses or contributions.

Additionally, even entities that do not hire a “lobbyist” will need to file reports if the organization spends \$5,000 in a calendar quarter on state-level direct and grassroots lobbying. See AFJ’s factsheet on [California lobbying disclosure thresholds](#) to find out whether your organization needs to register under the CPRA.

### **State Lobbying Rules Apply to All Nonprofits, Unions, and Foundations**

The CPRA’s lobbying disclosure rules apply to any person or organization that lobbies to influence California state legislative or administrative actions and meets [specific thresholds](#). This includes 501(c)(3) public charities and private foundations, 501(c)(4) social welfare organizations, and 501(c)(5) labor unions, as well as for-profit entities.

### **CPRA Applies to State-Level Direct and Grassroots Lobbying**

The CPRA applies only to direct and grassroots lobbying directed at the legislative and executive branches of California state government, including the state legislature, legislative committees, and legislative employees, as well as the governor, employees of the governor’s office (often called the “horseshoe”), state boards, commissions, and agencies. The CPRA covers attempts to influence state

legislation as well as state rules, regulations, or other action in a ratemaking or quasi-legislative proceeding, and the governor's approval or veto of any bill. The CPRA does not regulate local lobbying though, as discussed below, some local jurisdictions [separately regulate](#) local lobbying.

## Local Lobbying Ordinances

In addition to federal tax law and the CPRA, certain cities, counties, and special districts (including a select number of school districts, airport authorities, and transportation authorities) have separate laws regulating lobbying activities. [These laws](#) do not limit the amount of lobbying your organization can do. However, they may nonetheless impact the ways in which you interact with local public officials. The vast majority of jurisdictions in California do *not* regulate the interaction between organizations and government officials. While local lobbying laws add one more consideration as you develop your local advocacy strategy, they should not be thought of as obstacles to your organization's activity. For more details on local-level lobbying, read our fact sheet "[California City, County and Special District Local Lobby Ordinances.](#)"

## Gift and Travel Rules

All organizations must comply with the CPRA's [gift and travel rules](#), including organizations that do not currently have a lobbyist or file lobbying reports. As such, even if your organization is not required to register and report under the CPRA, it is nonetheless important to be familiar with the gift and travel rules. Additionally, many local lobbying and ethics ordinances impose strict limits (and bans) on gifts and travel for local public officials.

---

The information contained in this fact sheet and any attachments is being provided for informational purposes only and not as part of an attorney-client relationship. The information is not a substitute for expert legal, tax, or other professional advice tailored to your specific circumstances, and may not be relied upon for the purposes of avoiding any penalties that may be imposed under the Internal Revenue Code. Alliance for Justice publishes plain-language guides on nonprofit advocacy topics, offers educational workshops on the laws governing the advocacy of nonprofits, and provides technical assistance for nonprofits engaging in advocacy. For additional information, please feel free to contact Alliance for Justice at 866-NPLOBBY.

[www.bolderadvocacy.org](http://www.bolderadvocacy.org) | [www.allianceforjustice.org](http://www.allianceforjustice.org)