



MEMBER SERVICES REMINDER

I. ACTS PROHIBITED BY THE POLITICAL REFORM ACT

Lobbyists are subject to certain limitations and prohibitions under the Political Reform Act. These matters are described in more detail on the Fair Political Practices Commission's website (www.fppc.ca.gov) and in particular Chapter 7 of the "Lobbying Disclosure Information Manual" posted on the FPPC's website addresses these matters specifically. This reminder addresses two common matters, gifts and campaign contributions.

A. GIFTS

No lobbyist or lobbying firm may: Make a gift(s) aggregating more than ten dollars (\$10) in a calendar month, act as an agent or intermediary in the making of such a gift, or arrange such a gift to any of the following officials:

- A state candidate;
- An elected state officer;
- A legislative official;
- An agency official employed by an agency that is or should be listed on the lobbying registration statement.

B. CERTAIN CAMPAIGN CONTRIBUTIONS

Lobbyists may not mail, deliver, or otherwise transmit a campaign contribution, including a nonmonetary contribution, from their own personal assets to the following:

- An elected state official;
- A candidate for elective state office; or
- A committee primarily formed to support or oppose such a candidate if the candidate is seeking an office with, or the official is an elected officeholder of, an agency the lobbyist is registered to lobby. This prohibition also applies to a legal defense fund committee, a state or local ballot measure committee, an officeholder committee and a committee for an elective local office controlled by such state candidate.

The Political Reform Act does not prohibit a lobbyist or lobbying firm from making a contribution to a candidate's committee for federal office. (Lobbying Manual, Ch. 7.7, See, also FPPC Advice Letter to Medina, A-05-150). Note that contribution limits apply to such contributions under federal law.

If a business entity, including a lobbying firm, is owned, in whole or in part, by a lobbyist and the lobbyist participates in the decision to make the contribution, the entity may not contribute to an elected state official or candidate. Otherwise, lobbying firms may make campaign contributions.

A campaign committee may not make a contribution to an elected state official or candidate if the contribution is comprised of the personal assets of a lobbyist, in whole or in part, and the lobbyist participates in the decision to make the contribution.

A lobbyist is not prohibited from advising his or her clients or employer regarding making a contribution.

Lobbyists and lobbying firms are prohibited from hosting fundraising events at their home or office for an official or candidate whose office the lobbyist or lobbying firm is registered to lobby. In addition, a lobbying firm owned by a registered lobbyist may not rent its firm's offices as a fundraising venue (1) to an officeholder or candidate the firm is registered to lobby or (2) to one of its clients (a lobbyist employer) to benefit an officeholder or candidate the firm is registered to lobby. (Section 82015(f) and Regulation 18215(b)(4) and (5).)

A lobbying firm may host a meeting that is not a fundraising event in its office for the benefit of an officeholder or candidate for an office the lobbying firm is registered to lobby if the total cost of the meeting is \$500 or less, exclusive of the value of the office as a venue.