

California
Fair Political Practices Commission
AB 1743 Fact Sheet
Placement Agents: Lobbying Disclosure Requirements

What Forms Are Required?

- If you are registered as a Lobbying Firm (Form 601) complete Form 625 - Report of Lobbying Firm.
- If you are registered as a Lobbyist Employer (either Form 603 or 602) complete Form 635 - Report of Lobbyist Employer.
- If you are an individual lobbyist/placement agent (Form 604) complete Form 615 - Lobbyist Report.

How Do I File - Paper or Electronic?

- All filers may file online with Secretary of State.
- If you reach the \$2,500 threshold, you must file electronically. No paper copy is required.
- If your activity is less than the \$2,500 threshold, you may file paper reports.
- Once you have filed electronically, however, you must file all subsequent reports electronically.
- Electronic Filing thresholds and filing instructions can be found on the [Secretary of State's website](#).

When and Where Do I File?

- All lobbying filers must file quarterly reports even if no reportable activity occurred. The reporting periods and deadlines are:

Jan 1 - Mar 31 - Due Apr 30 ~ April 1 - Jun 30 - Due Jul 31
Jul 1 - Sep 30 - Due Oct 31 ~ Oct 1 - Dec 31 - Due Jan 31

- Deadlines that fall on a weekend or holiday are extended to the next business day.
- Paper reports are filed at: Secretary of State, 1500 11th St., Ste. 495, Sacramento, CA 95814, and must be postmarked no later than the due date.
- Free Online filing, as well as a list of software vendors, are available on the [Secretary of State's website](#).
- If you file electronically, no paper copy is required to be filed.

What types of payments are reported?

- Lobbying Firms report the percentage of their income received in connection with activity involving CA state retirement systems.
- Lobbyist Employers report the amount paid to in-house employees, lobbyists or lobbying firms for activity related to CA state retirement systems.
- All activity expenses (e.g. food, beverages) made to state officials.
- All campaign contributions made to state officeholders or candidates for state office
- All other payments related to influencing a decision by a CA state retirement system to invest CA state public retirement system assets.

What types of expenditures are reported in "Other Payments" on Form 635?

- Payments in support of your lobbyist (but not made directly to the lobbyist), such as the payment of a credit card charge for activity expenses.
- Travel and lodging in connection with meetings with officials of CA state retirement systems.
- Compensation paid to employees (other than a lobbyist) who spend 10 percent or more of their compensated time in a calendar month in connection with CA lobbying activities.

Where on the Form 615 - Lobbyist Report do I report my salary as lobbyist/placement agent?

- The Lobbyist Report is used to disclose payments **made** by a lobbyist/placement agent, not income received.
- The salary of an in-house employee lobbyist is reported on Form 635, Part II-A, Payments to In-House Employee Lobbyists. As noted above, salary should reflect only the percentage attributed to influencing matters before a CA state retirement system.

What if I have nothing to report? Am I still required to file?

- Yes. Quarterly reports are required to be filed regardless of the level of activity.
- Indicate "None" for what was actively lobbied.
- Do not leave sections blank - if there is no activity, place zeros. (See examples)
- Once you terminate, a final report covering the period you terminate in must be filed.

Examples of completed forms are on provided in the .pdf titled Disclosure Forms Examples. If you have any questions, please call our toll free advice line at 1-866-275-3772 or by email at advice@fppc.ca.gov .

Resources:

1. CA Fair Political Practices Commission: www.fppc.ca.gov
 - [Telephone and Email Advice](#)
 - [Lobbying Manual and Forms](#)
2. CA Secretary of State: www.sos.ca.gov
 - [Electronic Filing Information](#)
3. CA State Controller: www.sco.ca.gov
4. CA Public Employees Retirement Board: www.CalPERS.ca.gov
5. CA State Teachers Retirement Board: www.CalSTRS.com
6. Senate Committee on Legislative Ethics - Information on [Lobbyist Ethics Orientation Course](#), schedule and sign-up form.
7. [AB 1743](#)
8. Advice Letters:
[11-015](#)
[11-019](#)