

Date of Hearing: June 26, 2024

ASSEMBLY COMMITTEE ON ELECTIONS
Gail Pellerin, Chair
SB 1404 (Glazer) – As Amended June 18, 2024

SENATE VOTE: 28-2

SUBJECT: Political Reform Act of 1974: audits.

SUMMARY: Transfers responsibility for conducting audits of lobbying disclosure reports and statements from the Franchise Tax Board (FTB) to the Fair Political Practices Commission (FPPC), and reduces the number of such audits required to be performed. Allows the FPPC to impose a fee on lobbying firms and lobbyist employers of up to \$500 per year for each lobbyist representing those entities. Specifically, **this bill:**

- 1) Allows the FPPC to establish a fee on lobbying firms and lobbyist employers of up to \$500 per year per lobbyist listed on the registration statement of the firms and employers. Requires the Secretary of State (SOS) to charge that fee to lobbying firms and lobbyist employers. Creates the Field Audits and Investigations Fund (fund), requires the fee revenue to be deposited into the fund, and provides that moneys in the fund are continuously appropriated to the FPPC to conduct the audits and field investigations required by this bill.
- 2) Repeals a requirement that the FTB make audits and field investigations with respect to reports and statements filed with the SOS related to lobbying disclosure laws, beginning with lobbying firms and lobbyist employers that are selected for audits after 2024. Requires the FPPC to make such audits and field investigations beginning with lobbying firms and lobbyist employers that are selected for audits in February 2027.
- 3) Repeals a requirement that lobbying firms and lobbyist employers who employ one or more lobbyists be subject to an audit on a random basis with a 25% chance of being audited in each two-year period, and instead requires a total of 60 lobbying firms and lobbyist employers to be chosen for an audit on a random basis for each two-year period. Requires that 10 of the 60 audits be of lobbying firms or lobbyist employers that employ only placement agents. Requires that at least 25 of the 60 audits be of lobbying firms or lobbyist employers with total reported payments that approximate the total reported payments to the top 100 lobbying firms and lobbyist employers.
- 4) Requires the FPPC to do all of the following:
 - a) Publicly post any audit conducted by the FPPC on its website for at least 10 years following the conclusion of the audit;
 - b) Report annually to the Legislature on the number and type of audits completed by the FPPC; and,
 - c) Adopt regulations or policies to ensure operational independence of audit personnel from enforcement operations under the Political Reform Act (PRA).

5) Makes technical and conforming changes.

EXISTING LAW:

- 1) Creates the FPPC, and makes it responsible for the impartial, effective administration and implementation of the PRA. (Government Code §§83100, 83111)
- 2) Requires audits and investigations to be made with respect to reports and statements required by the PRA of the following:
 - a) Candidates for office, and their controlled committees, as follows:
 - i) All candidates for statewide office, supreme court, court of appeal, and Board of Equalization (BOE) that raised or spent \$25,000 or more in a primary or general election, as specified;
 - ii) 10% of statewide candidates who raised or spent less than \$25,000 in a primary or general election, selected at random, as specified;
 - iii) All candidates in 25% of Senate districts, Assembly districts, and superior court offices, selected at random, who raised or spent \$15,000 or more in a primary or general election, as specified; and,
 - iv) All candidates for the Legislature in a special primary or special runoff election who raised or spent \$15,000 or more in the election, as specified;
 - b) All committees primarily supporting or opposing a candidate selected for audit and that spent more than \$10,000 on the candidate's race, except as specified;
 - c) All committees primarily supporting or opposing a state ballot measure that spent more than \$10,000 supporting or opposing that measure, as specified;
 - d) State general purpose committees, except as specified, that raised or spent more than \$10,000 as follows:
 - i) All such committees that have not previously been audited, or that were audited and where the FPPC determined based on the audit that the committee was not in substantial compliance with the PRA; and,
 - ii) 25% of such committees that were previously audited and where the FPPC determined based on the audit that the committee *was* in substantial compliance with the PRA, selected at random;
 - e) Local candidates, their controlled committees, and candidates for the Board of Administration of the Public Employees' Retirement System as determined pursuant to regulations adopted by the FPPC; and,

- f) 25% of lobbying firms and lobbyist employers, selected at random. Any lobbyist employed by a firm or employer that is selected for an audit is audited as part of the firm's or employer's audit. (Government Code §90001)
- 3) Requires the FTB to perform the audits and field investigations detailed above, except in the case of audits and investigations of candidates for Controller and member of the BOE, and committees primarily supporting or opposing those candidates, which are performed by the FPPC instead. (Government Code §§90000, 90006)
- 4) Permits the FTB and the FPPC, in addition to the audits and investigations required by the PRA, to make investigations and audits of any other reports and statements required by the PRA. (Government Code §90003)
- 5) Requires a person who acts as a placement agent, as defined, in connection with a potential investment made by a state public retirement system, to register as a lobbyist. (Government Code §§7513.8, 7513.86, 82002, 82039, 82047.3)

FISCAL EFFECT: Unknown. State-mandated local program; contains a crimes and infractions disclaimer.

COMMENTS:

- 1) **Purpose of the Bill:** According to the author:

The Political Reform Act of 1974 (PRA) requires the Franchise Tax Board to conduct audits and field investigations on the reports filed by lobbyists to ensure honest reporting on money spent to influence legislators and legislation. Existing law requires 25% of lobbyist employers and lobbying firms to be subject to a random audit and investigation every 2 years.

Unfortunately, the Franchise Tax Board has essentially failed to comply with the law, as shown during an oversight hearing in March, 2023 of Senate Committee on Elections and Constitutional Amendments. From 2019 to 2022, there were only eight audits conducted, when more than 600 should have been performed. Two lobbying firms were audited for the 2019-20 session. No audits were conducted for the 2017-18 session.

Auditing is an important public accountability measure. The failure to hold more than 2,000 lobbying firms accountable has major implications for how legislators do their work. When dark money is allowed to operate unimpeded, corruption can follow. The media can't thoroughly cover the activities of lobbyists if there is no audit trail. This results in the public remaining uninformed about who is influencing whom, eroding confidence in our public institutions.

Any political group that is allowed to operate without scrutiny on their activities can amass unfair power advantages. Audits are a way to check those power advantages.

This bill would transfer the duties of performing lobbying audits from the Franchise Tax Board to the Fair Political Practices Commission. It would establish the lobbyist and lobbyist employer registration fee at up to \$500 to make this transfer revenue neutral on the state general fund. Importantly, audits can encourage compliance with the law, as individuals may be more likely to self-regulate if they know that they may be subject to an audit.

The FPPC has a successful track record in enforcing our campaign finance laws. They are more properly equipped to carry out the longstanding requirement to keep lobbyists and lobbyist employers accountable for honest reporting. The FPPC can bring a renewed and fresh outlook on the work required to apply sunshine to an area that has existed largely in the dark for too long.

- 2) **Political Reform Act Audits:** In 1974, California voters passed an initiative, Proposition 9, that created the FPPC and codified significant restrictions and prohibitions on candidates, officeholders, and lobbyists. That initiative is commonly known as the PRA.

As part of its regulation of campaigns and lobbying, the PRA requires candidates, political committees, and lobbyists to prepare periodic reports disclosing their activities. These statements and reports are submitted to specified government agencies, where they are made available to the public. Additionally, the PRA requires these statements and reports to be audited, typically by the FTB.

A report issued by the FPPC in February 1979, titled *California's Fair Political Practices Commission: The First Four Years*, explains that the PRA split enforcement and investigatory responsibilities among multiple agencies in an effort to ensure impartial and effective enforcement. The report states, "Mindful of the lessons of Watergate, the authors of the Political Reform Act assigned enforcement of the law to more than one agency, creating a system of 'checks and balances' to offset any potential political favoritism or unwillingness to take action."

This idea of a system of "checks and balances" aligns with a provision in the PRA that assigns certain audits to an entity other than the FTB. Specifically, audits related to candidates for Controller and the BOE, as well as committees supporting or opposing those candidates, are entrusted to the FPPC. This arrangement protects against an appearance that the Controller and the Chair of the BOE, who are members of the FTB, could improperly seek to influence those audits.

When the PRA was enacted, it established two types of audits: mandatory audits and discretionary audits. The mandatory audits required by the PRA included audits of all lobbyists, all candidates who received more than 15% of the vote in a general or special election, all candidates who spent more than \$25,000 and committees supporting such candidates, and other committees that spent more than \$10,000 in a calendar year. In addition to these mandatory audits, the PRA permitted the FTB and the FPPC to conduct discretionary audits.

Four years after the PRA's enactment, AB 3667 (McVittie), Chapter 1411, Statutes of 1978, created a third type of audits: random audits. These replaced mandatory audits for certain candidates and committees, and for lobbyists under certain situations. Unlike mandatory audits that require auditing all entities meeting certain criteria, random audits instead require auditing a specified percentage of entities that meet the selection criteria. The FPPC determines on a random basis the persons or political districts that must be audited.

AB 3667 was sponsored by the FPPC in response to an audit report prepared by Arthur Anderson & Co. and released by the Auditor General in August 1977. That report, titled *Efficiencies and Economies of the Administration of the Political Reform Act of 1974*, concluded that requiring the FTB to audit 100% of entities meeting the mandatory selection criteria "results in an unnecessarily high level of auditing" and that "[i]t is not necessary to audit every candidate, lobbyist, and committee to ensure compliance with the [PRA]." In a cover letter to the audit report, the Chair of the Joint Legislative Audit Committee indicated that the FTB's costs for PRA audits alone exceeded \$2.5 million, even though the proponents of the PRA had estimated that the total costs of the PRA would be approximately \$1 million. Legislative records related to AB 3667 indicated that the bill was expected to save up to \$1 million in FTB auditing costs per year.

- 3) **Senate Oversight Hearing:** According to the author, this bill was introduced in response to a March 7, 2023, oversight hearing by the Senate Elections & Constitutional Amendments Committee on the subject: *Status of Lobbying Audits—Franchise Tax Board*. Background materials prepared by the Committee for that hearing reveal that the FTB completed just four audits of lobbying firms and lobbyist employers for the two most recent legislative sessions for which the auditing period has ended—none for the 2017-18 session, and two lobbying firms and two lobbyist employers for the 2019-20 session. Based on the number of registered lobbying firms and lobbyist employers, the PRA required that more than 300 lobbying audits be conducted for each of those two legislative sessions. (The audit period for the 2021-22 session is ongoing; the FTB has not yet released any lobbying audits for that period.)

At the hearing, an FTB representative testified that it had never received sufficient resources to conduct all required PRA audits since the PRA was enacted. The representative further testified that FTB staff is responsible for PRA audits for 17 different workloads, and that in the last six fiscal years, FTB audits for those workloads generally had approached 10-50% of the levels required by the PRA. For lobbying audits, however, the FTB completed 3% or less of the required audits during that period.

- 4) **FTB Budget and Positions for PRA Audits:** At the oversight hearing described above, FTB staff indicated that the unit responsible for completing all of the PRA audits assigned to the FTB has 13 authorized positions—nine of whom conduct audits (the remaining staff serve in support roles). The Governor similarly proposed 13 authorized positions for that unit in the 2024-25 budget year, and the version of the state budget adopted by the Legislature on June 13 did not alter the proposed budget for that unit.

Based on a review of historical budget documents, it appears that the number of authorized positions in the Political Reform Audit unit of the FTB has not changed since the unit lost two authorized positions in the 2009-10 budget year, even though the number of audits

required by the PRA has increased as a result of policy changes described in more detail below. For each budget year between 1999-2000 and 2008-09, the Political Reform Audit unit of the FTB had 15 authorized positions.

- 5) **Previous Legislation and Lobbying Audit Workloads:** AB 1743 (Hernandez), Chapter 668, Statutes of 2010, requires a person who acts as a placement agent in connection with a potential investment made by a state public retirement system to register as a lobbyist pursuant to the PRA, among other provisions. AB 1743 took effect on January 1, 2011. The enactment of AB 1743 significantly increased the number of lobbying firms and lobbyist employers registered in California.

Under the PRA, lobbying registration is tied to two-year legislative sessions. In February of each odd-numbered year, the FPPC selects the lobbyist employers and lobbying firms to be audited for the preceding two-year session. For the 2009-10 Legislative Session (the last session before AB 1743 went into effect), 58 lobbyist employers and 91 lobbying firms were selected for audit, totaling 149 required lobbying audits. However, after AB 1743 went into effect, the number of lobbying audits required by the PRA increased substantially. For the 2011-12 Session, 238 lobbying audits were required (136 lobbyist employers and 102 lobbying firms), and for the 2013-14 Session, 304 lobbying audits were required (183 lobbyist employers and 121 lobbying firms). Since the 2013-14 Session, the required number of lobbying audits has remained steady at around 310 audits per two-year session. Since the implementation of AB 1743, the number of lobbying audits required by the PRA has more than doubled, with a corresponding increase in the FTB's lobbying audit workload.

- 6) **Activity Thresholds for Audits:** Currently, the PRA requires random audits of lobbying firms and lobbyist employers that employ one or more lobbyists, regardless of their level of activity. On the other hand, candidates and campaign committees generally are subject to audits only if they meet specified monetary thresholds for contributions received or expenditures made. (The only exception is for statewide candidates. The PRA requires all such candidates that raised or spent \$25,000 or more to be audited, and requires random audits of 10% of the candidates that raised and spent less than \$25,000.)

The monetary thresholds that determine whether a campaign or committee is subject to audit selection have not been updated since they were first established in 1974 (when the PRA was adopted) and 1978 (when AB 3667 updated the auditing rules and established random audits). As a result, when accounting for inflation, the amount of campaign activity that triggers audits now represents only 16-22% of the activity level when those thresholds were initially set.

- 7) **Prior Efforts to Shift Lobbying Audits:** The Governor's May revision for the proposed state budget for the 2021-22 fiscal year included a proposal to redirect the responsibility for performing lobbying audits and investigations from the FTB to the FPPC. At the time, the FPPC requested five positions and \$637,000 in funding from the general fund in 2021-22, and \$602,000 annually thereafter, to handle the required audits and investigations. The FPPC also sought trailer bill language to make necessary statutory changes for that transfer of responsibility. However, the relevant budget subcommittees in the Assembly and the Senate both rejected that request. Instead, the subcommittees voted to allocate the proposed funding

to the FTB so that they could continue to conduct those audits. The final version of the budget for the 2021-22 fiscal year, however, did not include additional funding for the FTB, nor did it include the funding and authority for the FPPC to take over the responsibility for lobbying audits and investigations.

Last year this committee heard SB 569 (Glazer), which proposed transferring responsibility for lobbying audits from the FTB to the FPPC, similar to the policy proposed by this bill. Unlike this bill, however, SB 569 did not include the fee on lobbying firms and lobbyist employers to fund that audit workload, nor did SB 569 include changes to the required number of lobbying audits in each two year period. This committee approved SB 569 by a 7-0 vote, but it was held on the Assembly Appropriations Committee's suspense file.

- 8) **FPPC Audit Pilot:** While the FTB currently has the responsibility for conducting the required lobbying audits, the FTB and the FPPC have the discretion to conduct additional investigations and audits with respect to any reports or statements required by the PRA. Using that discretion, the FPPC recently chose to conduct six lobbying audits as a pilot project. According to a report from the FPPC's Audit Division that was presented to the FPPC at its May 2024 meeting, the FPPC Audit Team has completed five of those six audits, with the final audit still in progress. Material findings were noted in four of the five completed audits, including the following four categories:

- **Lobbying Statements/Reports Not Filed, Not Timely Filed, or Not Filed in Paper and/or Electronically.** The most common findings noted relate to required statements and reports not being filed, being filed late, or not being filed in all correct formats.
- **Lobbying Prior to Registering.** In two of the audits, lobbyists began lobbying before registering as a lobbyist.
- **Over/underreporting of Payments Received or Expense Reimbursements Received.** One audit found that the lobbying firm overstated payments and expense reimbursements received, and failed to report another expense reimbursement.
- **Over/underreporting of Activity Expenses.** One audit found that the lobbyist employer underreported the amount of an activity expense.

According to FPPC staff, the Audit Division learned from this pilot project that the workload demand for conducting audits is higher than the FPPC previously believed. Accordingly, while the FPPC previously estimated that they would need between five positions (in connection with the budget proposal detailed above for the 2021-22 fiscal year) and nine positions (in connection with last year's SB 569) to assume responsibility for conducting lobbying audits, they now believe that more resources would be needed to complete all the lobbying audits required by the PRA. In light of that fact, the recent amendments to this bill propose adjustments to the required number of PRA lobbying audits based on the number of audits that the FPPC believes they can conduct with the resources that this bill provides.

- 9) **Reduction in Lobbying Audits and Limitations on Amending the Political Reform Act:** Under this bill, the FPPC would be required to conduct 60 total lobbying audits in each two-

year period. By comparison, the PRA currently requires 25% of lobbying firms and lobbyist employers to be audited in each two-year period. Based on the number of registered lobbying firms and lobbyist employers in recent legislative sessions, auditing 25% of lobbying firms and lobbyist employers would require that slightly more than 300 lobbying audits be conducted in each two-year period.

By requiring the FPPC to conduct 60 total lobbying audits in each two-year period, this bill likely would cut the number of required lobbying audits by more than 80% compared to the number that are required under existing law. Amendments to the PRA that are not submitted to the voters, such as those contained in this bill, must further the purposes of the initiative, among other conditions. The PRA's stated purposes include that "[t]he activities of lobbyists should be regulated and their finances disclosed in order that improper influences will not be directed at public officials," and that "[a]dequate enforcement mechanisms should be provided to public officials and private citizens in order that [the PRA] will be vigorously enforced."

A question could be raised about whether the significant reduction in the number of lobbying audits proposed by this bill furthers the purposes of the PRA. By helping to uncover violations of the PRA, audits are a crucial tool for enforcing the state's laws regulating lobbying. Furthermore, audits can encourage compliance with the law, as individuals may be more likely to self-regulate if they know that they may be subject to an audit. Reducing the number of required lobbying audits could undermine those goals.

On the other hand, this bill almost certainly would result in a substantial *increase* in the number of lobbying audits that are actually conducted, given that the FTB completed just four total lobbying audits for the 2017-18 and 2019-20 Legislative sessions combined. If the FPPC completed the required 60 lobbying audits in each two-year period, that would make it considerably more likely that violations of the PRA would be uncovered, and could help further promote voluntary compliance with the law. In light of that fact, the net effect of this bill likely would be greater regulation and scrutiny of lobbying firms and lobbyist employers, and more thorough enforcement of violations of the PRA's lobbying rules. Such an effect would appear to be consistent with the stated purposes of the PRA. To the extent that there is a desire to conduct lobbying audits at the levels currently required by the PRA, additional resources likely would need to be provided for those audits beyond those proposed by this bill.

- 10) **PRA Audit Options:** As detailed above, both campaign and lobbying audits are not being conducted at the levels required by the PRA. While it appears that lobbying audits are being conducted at a lower level than most other audit workloads, the FTB testified that it has not been able to approach the required level of auditing in *any* of the PRA audit workloads. Notwithstanding the author's concern that the low level of lobbying audits could undermine the state's political reform laws, the approach proposed by this bill is unlikely to result in PRA audits being conducted at the required levels absent further legislative actions. In particular, campaign audits likely would continue to be conducted at levels considerably below those required by the PRA.

Based on information provided by the author and presented at the oversight hearing

discussed above, and on research by committee staff, it appears that the PRA auditing program has been under-resourced for a large part the time that the PRA has been in effect. As described in more detail above, the PRA's auditing requirements were adjusted in a cost-saving effort just four years after the PRA was adopted after an independent assessment determined that the number of required audits could be reduced without harming the goals of the law.

Given that resource constraints have been a major reason why PRA audits have not been conducted at levels envisioned in existing law, the state likely will need to devote additional resources to conduct all the required audits. This bill provides additional resources for lobbying audits through the fee that it imposes. Furthermore, by shifting that workload from the FTB to the FPPC, this bill should allow the FTB to devote its PRA auditing resources to campaign audits, thereby potentially increasing the number of campaign audits that can be conducted. However, unless additional auditing resources are provided to the FTB, it is unlikely that they will be able to complete all the campaign audits that the PRA requires.

In addition or as an alternative to allocating additional resources, there are several policy changes that the state could consider to address the lack of compliance with the PRA's auditing requirements:

- (1) Consider adjusting the percentage of entities subject to random audits.
- (2) Reevaluate mandatory audit requirements and consider making those entities subject to random audits instead.
- (3) Consider adjusting monetary thresholds for audit selection to account for inflation.
- (4) Consider providing statutory direction about the PRA audits that should be prioritized if auditing resources are insufficient to complete all required audits.
- (5) Conduct a comprehensive evaluation of the PRA's auditing requirements to determine whether broader changes are justified.

- 11) **FPPC Audit Division:** In late 2021, the FPPC created an Audits and Assistance Division, with the responsibility for conducting mandatory and discretionary audits, and for selecting local candidates, controlled committees, and jurisdictions for audit by the FTB. Prior to the creation of that new division, the Audits and Assistance staff was housed within the FPPC's Enforcement Division.

According to FPPC staff, the Audit Division was created, in part, to allay concerns that having audit staff housed within the Enforcement Division could interfere with the independence of audits performed by the FPPC. This bill requires the FPPC to adopt regulations or policies to ensure the operational independence of its audit staff from enforcement operations.

- 12) **Amendment to Add a Sunset Date:** Given the significant changes that this bill proposes to lobbying audits under the PRA, the author and the committee may want to consider

amending this bill to add a sunset date. A sunset date of January 1, 2033, would allow the FPPC to perform lobbying audits for three full legislative sessions (2025-26; 2027-28; and 2029-30), and the audits for the first two of those legislative sessions would be complete before the Legislature needed to make a decision about whether to make this policy permanent, revert to current law, or to establish a different policy for conducting lobbying audits.

- 13) **Technical Amendments:** As currently drafted, this bill is unclear about the entity responsible for lobbying audits for the 2023-24 legislative session, and for the rules that would apply for selecting the lobbying firms and lobbyist employers subject to audit for that two-year period. Committee staff recommends amendments to clarify the author's intent that the existing lobbying audit rules and responsibilities will apply for any audits for the 2023-24 legislative session, and that the provisions of this bill will apply for lobbying audits for the 2025-26 session and beyond.

Additionally, recent amendments to this bill deleted language that exempted certain entities from the new fee imposed by this bill, but failed to remove a reference to that now-deleted provision. Accordingly, committee staff recommends that the language on page 3, lines 31-32 of the bill be amended as follows:

~~Except as specified in paragraph (2) of subdivision (b), the~~ The Secretary of State shall charge each lobbying firm and lobbyist

- 14) **Arguments in Support:** In support of this bill, the Fair Political Practices Commission writes:

The PRA requires mandatory audits of lobbying firms and lobbyist employers following every 2-year election cycle. These audits are crucial tools for upholding transparency and accountability and are the main and most consistent vehicles for monitoring compliance and discovering lobbying violations. Potential violations found through audits can be serious and include failure to file lobbying reports, omitting expenses or payments on reports, and impermissibly giving gifts or contributions to officials or candidates.

The FPPC has unique and robust expertise in the subject matter and would be well-suited to take on these audits, given appropriate resources. SB 1404 would transfer the duty to conduct these audits from the Franchise Tax Board to the FPPC. The bill would establish a new funding mechanism for the lobbying audit program by imposing an additional fee on lobbyists, and would require the FPPC to conduct a minimum of 60 audits every audit period, consistent with the workload capacity supported by the new fee.

- 15) **Arguments in Opposition:** A coalition of groups opposed to this bill, including the Institute of Governmental Advocates, wrote in opposition to a prior version of the bill:

[W]e support maintaining the FTB's role over the existing audit program, as the Political Reform Act originally required. There is no justification or need to transfer this duty to the FPPC, create a new division in the FPPC, and then fund

the NEW staffing needed. The bill acknowledges that housing the audit program at the FPPC requires the Commission to “adopt regulations or policies to ensure the operational independence of audit personnel from enforcement operations under the [Political Reform Act].” Leaving the audit function with FTB serves this important objective without the need for any regulation or policy.

Second, to fund the creation of an “independent audit” division within the FPPC, SB 1404 proposes to charge lobbying firms and lobbyist employers \$500 per-registered lobbyist. This amount is in addition to the current registration fee (\$50) and the current fee (\$50) imposed for ethics training every two years. Thus, just for the privilege of engaging in constitutionally protected activity, the state will be charging a minimum of \$600 (See, Cal. Const. Art. I, § 3)...

Since the PRA’s inception, mandatory audits of all candidates, committees, and others subject to the Act were part of the FTB’s annual budget appropriation. No valid reason exists to transfer this role to another agency and charge those subject to the duty so transferred to fund the new newly created division of the FPPC.

- 16) **Political Reform Act of 1974:** California voters passed an initiative, Proposition 9, in 1974 that created the FPPC and codified significant restrictions and prohibitions on candidates, officeholders, and lobbyists. That initiative is commonly known as the PRA. Amendments to the PRA that are not submitted to the voters, such as those contained in this bill, must further the purposes of the initiative and require a two-thirds vote of both houses of the Legislature.

REGISTERED SUPPORT / OPPOSITION:

Support

California Common Cause (prior version)
 California Taxpayers Association (prior version)
 Fair Political Practices Commission
 League of Women Voters of California

Opposition

California Association of Realtors (prior version)
 California Building Industry Association (prior version)
 California Business Properties Association (prior version)
 California Chamber of Commerce (prior version)
 California Retailers Association (prior version)
 California School Employees Association (unless amended) (prior version)
 Institute of Governmental Advocates (prior version)

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