



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

To: Chair Silver, Commissioners Brandt, Ortiz, and Wilson

From: Galena West, Executive Director
Dave Bainbridge, General Counsel

Subject: Regulation Projects and Schedule for 2025

Date: March 10, 2025

Introduction

Fair Political Practices Commission (“Commission”) staff proposes the following schedule for regulatory changes by the Commission in 2025. The general topic for each regulation project and the proposed dates it would be presented to the Commission are listed below. The summaries include a list of existing regulations that may be affected by the proposed regulatory changes but are not intended as a comprehensive list of all potential regulatory changes. Similarly, the scope and specific issues addressed in each regulation project described below may change during the process.

The proposed projects are based on prior direction from the Chair and Commissioners, as well as recommendations from staff and the public. The schedule may require revision during the year in the event of circumstances requiring immediate Commission action, changes in Commission priorities, legislative actions, staffing changes, or other unforeseen circumstances. Additional regulatory projects may be added upon direction by the Commission or as otherwise needed.

In most instances, a regulation project will be presented to the Commission at a meeting for pre-notice to allow for Commission and public comment and discussion. After the pre-notice meeting, staff may revise the regulations based on input provided, and submit it to the Office of Administrative Law pursuant to the Administrative Procedures Act. Typically, two months after the pre-notice meeting, staff will present the regulations to the Commission for final consideration and adoption. The Law and Policy Committee, at its discretion, may meet to review, discuss, take public comment, and make recommendations on any regulatory proposals before the item is presented to the Commission.

The purpose of the regulation schedule is to provide Commissioners, staff, and the public advance notice of potential upcoming regulatory changes. Staff encourages interested parties to provide input early on so that staff may consider that input during the drafting process. Upon approval by the Commission, the regulatory calendar will be posted on the Commission’s website and will be updated as necessary.

Project Summaries

Subject	Description	Reg Sections¹	Relevant Statutes²	Source
Levine Act regulations update	Update regulations interpreting and applying Gov't Code § 84308 in response to changes made to the statute by SB 1181 and SB 1243	18438 – 18438.8	84308	Statutory amendments
Annual SEI deadline extension	Regulation extending the deadline for officials in Los Angeles County to file an annual SEI	18720	87203, 87302	Commission
Mandatory electronic filing of SEI with the FPPC	Amend regulations concerning electronic filing of statement of economic interests (SEI) to implement AB 1170, which requires those who file an SEI with the FPPC to do so electronically using the FPPC electronic filing system.	18115.2, 18313.6, 18724, 18753, 18754	87500, 87500.3	Statutory amendments
Committee reopening	Amend the existing regulation governing reopening of campaign committees to explicitly permit a committee to be reopened to report reimbursement for security expenses permitted by AB 2041, and to pay a debt unknown to the committee at the time of closing	18404.1	84102, 84103, 84214, 89517.5	Legal Division staff
Contributions made by electronic transfer	New regulation requiring third-party payment platforms that process electronic campaign contributions to have know-your-customer (KYC) protocols that verify the identity of persons making contributions.	New	84211, 84301	Enforcement Division staff
Notice of attributing contribution	New provision requiring a candidate-controlled committee that transfers funds to another committee subject to attribution requirements to provide notice to the contributor to whom a contribution was attributed	18536	85306	California Political Attorneys Association
Enforcement penalties	Amend “streamline” regulations to clarify Enforcement’s discretion to offer streamline settlements for violations that do not otherwise qualify for a reduced	18360.1-18360.3	83116	Commission

¹ All regulatory references are to the California Code of Regulations, title 2, division 6.

² All statutory references are to the California Government Code.

	penalty, require the Commission to directly approve streamline fines, and consider existing inclusions and exclusion criteria			
Probable cause proceedings	Update the existing PC regulation to streamline processes and lessen unnecessary delays in conducting probable cause proceedings	18361.4	83116	Commission
Behested payment reporting	Adopt new regulations and/or amend existing regulations to codify existing advice, define statutory terms, and establish when general requests for payments trigger reporting requirements		82004.5, 84224	Chair

Regulation Schedule

Commission Meeting	Pre-notice	Adoption
January	Levine Act regulations update	
February	Mandatory E-filing of SEI	
March		Levine Act regulations update, Annual SEI deadline extension
April		Mandatory E-filing of SEIs
May	Committee reopening	
June	Contributions made by electronic transfer	
July		
August	Notice of attribution of contributions	Committee reopening, Contributions made by electronic transfer
September	Enforcement penalties, Probable cause proceedings	
October	Behested payment reporting	Notice of attribution of contributions
November		Enforcement penalties, Probable cause proceedings
December		