



California's Campaign Watchdog Announces Guidelines for Campaign and Lobby Reporting During Stay-at-Home Orders

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While state elections officials around the country are grappling with ways to ensure that voters can participate in elections with minimal disruption amidst the COVID-19 pandemic, campaign committees, lobbyists and lobbying firms, and other political advocates with reporting obligations are ringing the alarm bell on being unable to file reports in a timely fashion. Campaign and lobby reports are often filed by professional third parties, but still require original signatures by the client, which can be challenging if they are sick or in quarantined. Stay-at-home orders are further exacerbating compliance, since many government agencies that would answer the regulated community's compliance questions are closed.

California's regulator, the Fair Political Practices Commission, issued a new policy that assures the public it will accept best efforts to comply with filing requirements during this time. In particular, the FPPC makes the following recommendations:

- State and local candidates are encouraged to make use of electronic filing options, if available.
- If complying with original signature requirements is not possible, make use of digital and electronic options by scanning, faxing, or emailing reports.
- If filing is not possible, communicate this with the filing official and/or document all attempts to comply.

Although the FPPC does not have the ability to waive statutory deadlines and original signature requirements, it has pledged to treat COVID-19-related late filings as a strong mitigating factor in any enforcement actions.

In response to these conditions created by the COVID-19 pandemic, Nossaman has activated its contingency plans to ensure the continuity of service to our clients. We remain fully staffed so that PAC,

lobby, and major donor reports are timely filed; checks can be received and deposited, and PAC contributions and expenses may be paid. Our full team, maintains its strong relationships with regulators and vendors. This allows Nossaman to continue providing uninterrupted compliance services during California's stay-at-home order.

If you need assistance with your California reporting obligations, contact Amber Maltbie at amaltbie@nossaman.com, Dawn Huck at dhuck@nossaman.com or Karen Roberts at kroberts@nossaman.com.