

Policy Alert

Guidance Issued on California Placement Agent Rules

December 20, 2010

The California Fair Political Practices Commission (FPPC) recently issued guidance on the placement agent lobbyist registration rules that become effective January 1, 2011. The FPPC's guidance focuses on compliance with lobbying state-level pension funds. The limited guidance also specifies that the FPPC is considering regulations to clarify the new law's application.

The guidance clarifies that registration is required before acting as a placement agent. For those potential registrants who anticipate acting in the early days of January, the FPPC has stated that it will accept registrations for 2011-2012 in December and that the effective date must show January 1, 2011. Please remember not to act as a placement agent with state-level pension funds before a registration is submitted.

Employees who act as placement agents file different lobbying registration paperwork from persons acting as placement agents on a contract basis. The lobbyist employer's paperwork must correspond to the lobbyist's paperwork. Registration must also include—

- \$50 registration fee per lobbyist (an increase from \$25)
- photograph of lobbyist
- box selected that lobbyist will attend ethics course within 12 months of registering as a lobbyist (note the ethics course is not offered online).

The guidance is available [here](#), and our original alert is available [here](#).

CONTACT INFORMATION

If you have any questions concerning this alert, please contact —

Melissa L. Laurenza
m Laurenza@akingump.com
202.887.4251
Washington, D.C.

Carrie Hoback Hill
choback@akingump.com
202.416.5153
Washington, D.C.

Julie B. Hodgson
j Hodgson@akingump.com
202.416.5152
Washington, D.C.



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