

EXHIBIT A



Lobbying Disclosure Information Manual

**California Fair Political
Practices Commission**

Toll-free advice line: 1 (866) ASK-FPPC
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Chapter 3

Registration and Termination

The Political Reform Act requires most lobbying filers to submit registration statements that identify persons engaged in lobbying activity. This chapter provides guidance on when the forms are due and how to complete them. All registration forms are filed with the Secretary of State, either electronically, in paper format, or both. (See Chapter 2.) Each legislative session, the Secretary of State's office publishes *The Directory of Lobbyists, Lobbying Firms & Lobbyist Employers* based on information provided by lobbying firm and lobbyist employer registration statements. Registration information is also available online through the Secretary of State's website at www.ss.ca.gov.

Name Identification Requirements

The Act requires disclosure of the names of entities that engage in lobbying activity. If a lobbyist employer is a business entity with subsidiaries, the name of the subsidiaries may be required to be separately identified along with the corporate parent's name. This manual can not address all of the different relationships of affiliated entities. Following is a selected summary of Commission advice. Lobbyist employers are encouraged to contact the FPPC for specific guidance.

Examples *A corporation and its subsidiary both make payments to a lobbying firm; the name of the filer should be listed as: ABC Company and its affiliate, XYZ subsidiary.*

A lobbying firm represents the lobbying interests of a corporation and its subsidiary, and each entity provides direction to the lobbying firm. The corporation makes all of the payments to the lobbying firm. The name

of the filer should be listed as: ABC Company and its affiliate, XYZ subsidiary.

A corporation has several subsidiaries. The corporation, alone, directs and controls the lobbying activity and makes all payments to the lobbying firm. The subsidiaries are not involved with lobbying activity nor do they make payments to the lobbying firm. Even though the subsidiaries may benefit from the lobbying firm's services, the name of the filer should be listed as: ABC Corporation. The subsidiaries are not required to be identified.

A corporation makes payments to a lobbying firm. A subsidiary of the corporation makes payments to a different lobbying firm. The lobbying activities of the corporation and the subsidiary are independent. The corporation does not pay for the subsidiary's activities or control its lobbying activities. The corporation is not required to identify the name of the subsidiary on its reports, nor is the subsidiary required to identify the name of the parent corporation on its reports.

Filing Electronically or Online

When a registration statement is being filed for the first time, no electronic filing of the form is required. However, if the filer is renewing or amending the registration, or filing a termination statement, and was required to file statements electronically, the form must be filed electronically, as well as on paper. (See Chapter 2 to determine if you are required to file electronically.)