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CONSENT

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Bill No: AB 1736  
Author: Pellerin (D)  
Introduced: 2/5/26  
Vote: 27

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SENATE ELECTIONS & C.A. COMMITTEE: 5-0, 6/9/26  
AYES: Wiener, Choi, Allen, Cervantes, Umberg

SENATE APPROPRIATIONS COMMITTEE: Senate Rule 28.8

ASSEMBLY FLOOR: 74-0, 4/23/26 (Consent) - See last page for vote

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**SUBJECT:** Political Reform Act of 1974: lobbyist employers: fictitious appearances

**SOURCE:** California Fair Political Practices Commission

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**DIGEST:** This bill prohibits a lobbyist employer from creating a fictitious appearance of public favor or disfavor for a legislative or administrative action.

**ANALYSIS:**

Existing law:

- 1) Prohibits a lobbyist or a lobbying firm from:
  - a) Doing anything with the purpose of placing any elected state officer, legislative official, agency official, or state candidate under personal obligation to the lobbyist, lobbying firm, or the firm's employer.
  - b) Deceiving or attempting to deceive any elected state officer, legislative official, agency official, or state candidate about any material fact pertinent to pending or proposed legislation or administrative action.

- c) Causing or influencing the introduction of a bill or amendment to a bill with the purpose of the lobbyist or firm getting hired to secure passage or defeat of the bill or its amendment.
- d) Accepting payment in any way contingent upon the defeat, enactment, or outcome of any proposed legislative or administrative action.
- e) Representing falsely that the lobbyist or lobbying firm can control the official action of an elected state officer, legislative official, or agency official.
- f) Attempting to create a fictitious appearance of public favor or disfavor of any proposed legislative or administrative action, including causing any communication to be sent to any elected state officer, legislative official, agency official, or state candidate in the name of a fictitious person or in the name of a real person who has not given consent.

This bill adds a lobbyist employer to those prohibited from taking the action in f) of existing law and clarifies that the prohibition applies to both attempting to create and to creating a false appearance of public favor or disfavor for legislative or administrative action.

## **Background**

Proposition 9, which appeared on the June 1974 ballot, created the California Political Reform Act (PRA) and established California's system of regulating lobbying activity, campaign finance, and conflicts of interest for public officials. Proposition 9 created the Fair Political Practices Commission (FPPC) to implement, administer, and enforce the PRA. The PRA regulates lobbyists, including requiring lobbyists, lobbying firms, and lobbyist employers to register with the Secretary of State and to file periodic reports disclosing their activities.

## **Comments**

*Author's Statement.* Public officials often make decisions based on the outreach from constituents. But what if the hundreds of comments that we are receiving are not from constituents, but are AI-generated? This is what this bill aims to fix. This bill expands existing provisions in the PRA in which lobbyists and lobbying firms cannot create fictitious characters to generate favor or disfavor of any proposed legislative action to organizations that employ lobbyists or lobbying firms as well.

In 2017, during the Federal Communications Commission (FCC) Net Neutrality Hearing, the FCC received over 22 million comments from bots. These comments were not immediately flagged as AI generated because they appeared to have been drafted by real, concerned individuals. Nine years later, the ability for bots to mimic human dialogue, writing, and punctuation have only frightfully improved. As AI becomes increasingly more sophisticated, the line between AI generated and real-human comments has been blurring and becoming more indistinguishable, penetrating most aspects of our lives.

**FISCAL EFFECT:** Appropriation: No Fiscal Com.: Yes Local: Yes

**SUPPORT:** (Verified 6/22/26)

California Fair Political Practices Commission (source)

California Common Cause

CFT – A Union of Educators and Classified Professionals, AFT, AFL-CIO

League of Women Voters of California

**OPPOSITION:** (Verified 6/22/26)

None received

**ARGUMENTS IN SUPPORT:**

Writing in support, this bill’s sponsor, the FPPC, notes that the PRA prohibits lobbyists and lobbying firms from engaging in a practice known as “astroturfing.” The increased proliferation and accessibility of AI tools exacerbate the threat this deceptive practice poses to legislative and governmental decision making. This bill further protects governmental institutions from the potential influence of artificial opinion by extending the above prohibition to apply to lobbyist employers.

CFT – A Union of Educators & Classified Professionals, AFT, AFL-CIO writes in support that “[t]he bill’s provisions will ensure that all entities employing lobbyists adhere to the highest standards of integrity by prohibiting efforts to create deceptive public perceptions, such as the use of bots, or generative AI to create the perception of additional supporters [or] opponents regarding legislative or administrative actions.” CFT says that this bill builds trust in the legislative process, holds all parties accountable, aligns with the principles of transparency and honesty in political discourse, and supports the ongoing efforts to create a fairer and more transparent governmental process

ASSEMBLY FLOOR: 74-0, 4/23/26

AYES: Aguiar-Curry, Ahrens, Alanis, Alvarez, Arambula, Ávila Farías, Bains, Bauer-Kahan, Bennett, Berman, Boerner, Bonta, Bryan, Calderon, Caloza, Carrillo, Castillo, Chen, Connolly, Davies, DeMaio, Dixon, Elhawary, Ellis, Flora, Fong, Gabriel, Gallagher, Garcia, Gipson, Jeff Gonzalez, Mark González, Haney, Harabedian, Hart, Hoover, Irwin, Jackson, Johnson, Kalra, Krell, Lackey, Lee, Lowenthal, Macedo, McKinnor, Muratsuchi, Nguyen, Ortega, Pacheco, Papan, Patel, Patterson, Pellerin, Petrie-Norris, Quirk-Silva, Ramos, Ransom, Michelle Rodriguez, Rogers, Blanca Rubio, Sanchez, Schiavo, Schultz, Solache, Stefani, Ta, Tangipa, Valencia, Wallis, Ward, Wilson, Zbur, Rivas  
NO VOTE RECORDED: Addis, Hadwick, Celeste Rodriguez, Sharp-Collins, Soria, Wicks

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6/24/26 16:30:31

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