

**State of California  
Office of Administrative Law**

**In re:**  
**California Privacy Protection Agency**

**Regulatory Action:**

**Title 11, California Code of Regulations**

**Adopt sections:**

**Amend sections: 7500**

**Repeal sections:**

**NOTICE OF FILING AND PRINTING ONLY**

**Government Code Section 11343.8**

**OAL Matter Number: 2026-0819-01**

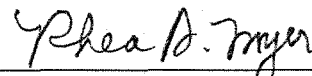
**OAL Matter Type: File and Print Only (FP)**

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This is a Conflict-of-Interest code that has been approved by the Fair Political Commission and is being submitted for filing with the Secretary of State and printing only

OAL filed this regulation(s) or order(s) of repeal with the Secretary of State and will publish the regulation(s) or order(s) of repeal in the California Code of Regulations.

**Date:** September 29, 2026



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Rhea A. Moyer  
Associate Governmental  
Program Analyst

**For:** Kenneth J. Pogue  
Director

**Original:** Tom Kemp, Executive Director  
**Copy:** Kevin Sabo

## NOTICE PUBLICATION/REGULATIONS SUBMISSION

STD. 400 (REV. 10/2019)

FILE PRINT

For use by Secretary of State only

|                                                    |                                             |                                                 |                               |
|----------------------------------------------------|---------------------------------------------|-------------------------------------------------|-------------------------------|
| OAL FILE NUMBERS                                   | NOTICE FILE NUMBER<br><b>Z-2026-0511-04</b> | REGULATORY ACTION NUMBER<br><b>2026-0819-01</b> | EMERGENCY NUMBER<br><b>FP</b> |
| For use by Office of Administrative Law (OAL) only |                                             |                                                 |                               |
| NOTICE                                             |                                             | REGULATIONS                                     |                               |

ENDORSED - FILED  
in the office of the Secretary of State  
of the State of California

SEP 29 2026  
NG 2:04pm

OFFICE OF ADMIN. LAW  
2026 AUG 19 PM3:33

AGENCY WITH RULEMAKING AUTHORITY  
California Privacy Protection Agency

AGENCY FILE NUMBER (If any)

## A. PUBLICATION OF NOTICE (Complete for publication in Notice Register)

|                                                                                                                |                                                                                                                                                                          |                          |                                             |                                    |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|---------------------------------------------|------------------------------------|
| 1. SUBJECT OF NOTICE                                                                                           |                                                                                                                                                                          | TITLE(S)                 | FIRST SECTION AFFECTED                      | 2. REQUESTED PUBLICATION DATE      |
| 3. NOTICE TYPE<br><input type="checkbox"/> Notice re Proposed Regulatory Action <input type="checkbox"/> Other |                                                                                                                                                                          | 4. AGENCY CONTACT PERSON | TELEPHONE NUMBER                            | FAX NUMBER (Optional)              |
| OAL USE ONLY                                                                                                   | ACTION ON PROPOSED NOTICE<br><input type="checkbox"/> Approved as Submitted <input type="checkbox"/> Approved as Modified <input type="checkbox"/> Disapproved/Withdrawn |                          | NOTICE REGISTER NUMBER<br><b>2026, 21-2</b> | PUBLICATION DATE<br><b>5/22/26</b> |

## B. SUBMISSION OF REGULATIONS (Complete when submitting regulations)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                                            |                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| 1a. SUBJECT OF REGULATION(S)<br>Conflict of Interest Code Amendments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | 1b. ALL PREVIOUS RELATED OAL REGULATORY ACTION NUMBER(S)<br>Z-2026-0511-04 |                                                                               |
| 2. SPECIFY CALIFORNIA CODE OF REGULATIONS TITLE(S) AND SECTION(S) (including title 26, if toxics related)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |                                                                            |                                                                               |
| SECTION(S) AFFECTED<br>(List all section number(s) individually. Attach additional sheet if needed.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | ADOPT                                                                      |                                                                               |
| TITLE(S)<br>11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  | AMEND<br>7500                                                              |                                                                               |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | REPEAL                                                                     |                                                                               |
| 3. TYPE OF FILING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |                                                                            |                                                                               |
| <input type="checkbox"/> Regular Rulemaking (Gov. Code §11346)<br><input type="checkbox"/> Resubmittal of disapproved or withdrawn nonemergency filing (Gov. Code §§11349.3, 11349.4)<br><input type="checkbox"/> Emergency (Gov. Code, §11346.1(b))<br><input type="checkbox"/> Certificate of Compliance: The agency officer named below certifies that this agency complied with the provisions of Gov. Code §§11346.2-11347.3 either before the emergency regulation was adopted or within the time period required by statute.<br><input type="checkbox"/> Resubmittal of disapproved or withdrawn emergency filing (Gov. Code, §11346.1)<br><input type="checkbox"/> Emergency Readopt (Gov. Code, §11346.1(h))<br><input checked="" type="checkbox"/> File & Print<br><input type="checkbox"/> Other (Specify) _____<br><input type="checkbox"/> Changes Without Regulatory Effect (Cal. Code Regs., title 1, §100)<br><input type="checkbox"/> Print Only |  |                                                                            |                                                                               |
| 4. ALL BEGINNING AND ENDING DATES OF AVAILABILITY OF MODIFIED REGULATIONS AND/OR MATERIAL ADDED TO THE RULEMAKING FILE (Cal. Code Regs. title 1, §44 and Gov. Code §11347.1)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                            |                                                                               |
| 5. EFFECTIVE DATE OF CHANGES (Gov. Code, §§ 11343.4, 11346.1(d); Cal. Code Regs., title 1, §100)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                            |                                                                               |
| <input type="checkbox"/> Effective January 1, April 1, July 1, or October 1 (Gov. Code §11343.4(a)) <input type="checkbox"/> Effective on filing with Secretary of State <input type="checkbox"/> \$100 Changes Without Regulatory Effect <input checked="" type="checkbox"/> Effective other (Specify) 30 days after SOS filing per 2 CCR 18750                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                            |                                                                               |
| 6. CHECK IF THESE REGULATIONS REQUIRE NOTICE TO, OR REVIEW, CONSULTATION, APPROVAL OR CONCURRENCE BY, ANOTHER AGENCY OR ENTITY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                                                            |                                                                               |
| <input type="checkbox"/> Department of Finance (Form STD. 399) (SAM §6660) <input checked="" type="checkbox"/> Fair Political Practices Commission <input type="checkbox"/> State Fire Marshal<br><input type="checkbox"/> Other (Specify) _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                            |                                                                               |
| 7. CONTACT PERSON<br>Kevin Sabo                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | TELEPHONE NUMBER<br>(279) 278-5086                                         | FAX NUMBER (Optional)<br>E-MAIL ADDRESS (Optional)<br>kevin.sabo@coppa.ca.gov |

8. I certify that the attached copy of the regulation(s) is a true and correct copy of the regulation(s) identified on this form, that the information specified on this form is true and correct, and that I am the head of the agency taking this action, or a designee of the head of the agency, and am authorized to make this certification.

SIGNATURE OF AGENCY HEAD OR DESIGNEE  
Garcia, Tiffany@CPPA  
TYPED NAME AND TITLE OF SIGNATORY  
Tiffany Garcia, Chief Deputy Executive Director

DATE  
8/19/2026

For use by Office of Administrative Law (OAL) only  
AUTHORIZED FOR FILING AND PRINTING

SEP 29 2026  
Office of Administrative Law

# CALIFORNIA PRIVACY PROTECTION AGENCY

## TITLE 11. LAW

### DIVISION 6. CALIFORNIA PRIVACY PROTECTION AGENCY CHAPTER 2. CALIFORNIA PRIVACY PROTECTION AGENCY — CONFLICT-OF-INTEREST CODE

#### AMENDMENTS TO THE CODE

#### § 7500. California Privacy Protection Agency — Conflict-of-Interest Code.

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 California Code of Regulations Section 18730), that contains the terms of a standard conflict of interest code which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference into the Conflict of Interest Code for the California Privacy Protection Agency. This regulation and the attached Appendices, designating positions, and establishing disclosure requirements categories, shall constitute the Conflict of Interest code of the California Privacy Protection Agency (CPPA).

~~The statement of economic interests for the CPPA Board Members and the Executive Director shall be filed electronically with the Fair Political Practices Commission. All other individuals holding designated positions shall file their statements with the CPPA. All statements must be made available for public inspection and reproduction (Gov. Code Sec. 81008).~~

CPPA Board Members and the Executive Director must file their statements of economic interests electronically with the Fair Political Practices Commission. All other individuals holding designated positions must file their statements with the CPPA. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

#### APPENDIX A

| <i>Designated Positions</i>                        | <i>Disclosure Category</i> |
|----------------------------------------------------|----------------------------|
|                                                    |                            |
| California Privacy Protection Agency Board Members | 1                          |
| Executive Director                                 | 1                          |
| <u>Chief Deputy Executive Director</u>             | <u>1</u>                   |
| <u>Deputy Director of Policy and Legislation</u>   | <u>1</u>                   |

|                                                                            |             |
|----------------------------------------------------------------------------|-------------|
| Chief Privacy Auditor                                                      | 1           |
| Attorney (all levels)                                                      | 1           |
| <u>Senior Management Auditor</u>                                           | <u>1</u>    |
| <u>Information Technology Specialist III (Audits, Enforcement)</u>         | <u>1</u>    |
| <u>Staff Services Manager I (Enforcement, Legal)</u>                       | <u>1</u>    |
| Deputy Director of Administration                                          | 2           |
| <u>Staff Services Manager III/Manager II</u>                               | <u>2</u>    |
| <u>Staff Services Manager II/Supervisor II/Analyst IV (Administration)</u> | <u>2</u>    |
| <u>Staff Services Manager I/Supervisor I (Administration)</u>              | <u>2</u>    |
| <u>Deputy Director of Public and External Affairs</u>                      | <u>3</u>    |
| <u>Information Officer II</u>                                              | <u>3</u>    |
| <u>Chief Information Officer/Chief of Information Technology</u>           | <u>4, 5</u> |
| <u>Information Technology Manager I</u>                                    | <u>4, 5</u> |
| <u>Information Technology Specialist II</u>                                | <u>4, 5</u> |
| <u>Assistant Deputy Director (Data Broker Unit)</u>                        | <u>4, 5</u> |
| <u>Supervisor II (Data Broker Unit)</u>                                    | <u>5</u>    |
| Consultants/New Positions                                                  | *           |
|                                                                            | —           |

\* Consultants/new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code subject to the following limitation:

The Executive Director may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. Such determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Executive Director’s written determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Gov. Code Sec. 81008.)

## APPENDIX B

### Disclosure Categories

#### Category 1:

Designated positions in this category shall disclose all investments, and business positions in business entities, and sources of income, (including receipt of gifts, loans, and travel payments), and real property located in the state of California.

Category 2:

Designated positions in this category shall disclose investments, and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments); ~~from~~ if the business entity or sources ~~that~~ provides leased facilities, ~~goods~~ products, equipment, vehicles, machinery, or services; (including training or consulting services) of the type utilized by the ~~California Privacy Protection~~ Agency.

Category 3:

Designated positions in this category shall disclose investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides media or advertising services to the CPPA.

Category 4:

Designated positions in this category shall disclose investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source provides information technology or telecommunication goods, products, or services including computer hardware or software companies, computer consultant services, information technology training companies, and data processing firms of the type utilized by the CPPA.

Category 5:

Designated positions in this category shall disclose investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) if the business entity or source is, or was, registered as a data broker or the business entity or source is subject to the CPPA's regulatory authority in its capacity as a data broker.

*Note: Authority cited: Section 87300, Government Code. Reference: Sections 87300 and 87302, Government Code; and Title 2 Code of Regulations Section 18730.*

This is the last page of the conflict of interest code for the CA Privacy Protection Agency .



## CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the  
CA Privacy Protection Agency was approved on 8/18/26

Sukhdip K Brar  
Digitally signed by Sukhdip K  
Brar  
Date: 2026.08.18 12:53:42  
-07'00'

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Sukhdip K. Brar

Assistant Chief Counsel

Fair Political Practices Commission

Pursuant to Government Code Section 11346.2:

Secretary of State Filing Date:

Effective: