



## Bill Analysis

Author: Rivas, et al.

Sponsor:

Bill Number: AB 71

Related Bills: See Legislative History  
Amended: March 25, 2021

## SUBJECT

Bring California Home Act: Global Intangible Low-Taxed Income (GILTI); and Repatriated Income and Tax Credit Limitation

## SUMMARY

This bill would do the following:

### *Provision No. 1 ~ PITL Conformity to GILTI (Section 1):*

This provision, under the Personal Income Tax Law (PITL), would generally conform to federal law, subject to modifications, and require certain taxpayers that are a United States (US) shareholder of a controlled foreign corporation (CFC) to include GILTI in their gross income, as provided.

### *Provision No. 2 ~ CTL Conformity to GILTI, Repatriation Income Provisions, and Limited Use of Tax Credits (Sections 2 and 3):*

This provision, under the Corporation Tax Law (CTL), would require a water's-edge taxpayer to take into account 50 percent (50%) of GILTI, as provided, 40 percent (40%) of repatriation income of its affiliated corporations, as provided, and would limit the total use of certain credits, as defined, from reducing the additional tax liability added by the provisions of this bill by not more than five million dollars (\$5,000,000), as provided.

### *Provision No. 3 ~ FTB Reporting Requirements (Section 9):*

This provision, under the Welfare and Institutions Code (WIC), would require the Franchise Tax Board (FTB), in consultation with the Department of Finance (DOF), to provide revenue information related to the provisions of this bill to the Controller, as provided.

## RECOMMENDATION

No position.

## **SUMMARY OF AMENDMENTS**

The March 25, 2021, amendments removed provisions of the bill related to the corporate tax rate increase (discussed in the department's analysis of the bill as amended on January 12, 2021, in Provision 2); modified provisions of the bill related to the tax credit limitation (discussed in the department's analysis of the bill as amended on January 12, 2021, in Provision 3); made several technical corrections; and made other miscellaneous nonsubstantive amendments.

**Provision 1:** The amendments related to Provision 1 resolved all implementation considerations as discussed in the department's analysis of the bill as amended on January 12, 2021, in Provision 1.

**Provision 2:** The amendments related to Provision 2 resolved two of the implementation considerations; created a new implementation consideration; resolved all of the technical considerations; created a new technical consideration; and resolved one of the two policy considerations as discussed in the department's analysis of the bill as amended on January 12, 2021, in Provision 3.

**Provision 3:** The amendments related to Provision 3 resolved all implementation considerations as discussed in the department's analysis of the bill as amended on January 12, 2021, in Provision 4; created a new implementation consideration; and created a new technical consideration.

The bill was also amended to state the intent of the Legislature is to use any revenue generated by Revenue and Taxation Code (RTC) sections 17087.7 and 25110.1 proposed by the bill to fund the Bring California Home Act (BCHA); and to dedicate a funding source of at least \$2.4 billion per year towards homelessness.

This analysis only addresses the provisions of this bill that impact the department.

## **REASON FOR THE BILL**

The reason for the bill is to provide a reliable source of revenue for the BCHA and for local governments to implement response plans and programs to combat homelessness.

## **ANALYSIS**

### ***Analysis Provision 1 (Section 1):***

#### *PITL Conformity to GILTI*

This provision, under the PITL, for taxable years beginning on or after January 1, 2022, would generally conform to Internal Revenue Code (IRC) section 951A, relating to GILTI, as enacted by the federal Tax Cuts and Jobs Act of 2017 (TCJA) (Public

Law 115-97), with modifications. Generally, the federal GILTI rules require a 10 percent (10%) US shareholder of a CFC to include in its current income the shareholder's pro rata share of the CFC's GILTI. GILTI is the excess (if any) of a US shareholder's net CFC tested income for the taxable year, over the US shareholder's net deemed tangible income return for the taxable year.

For purposes of this provision, IRC section 951A would be modified for state purposes as follows:

- 1) If the taxpayer is not a C corporation and derives GILTI income from a combined reporting group, then the taxpayer would include 50 percent (50%) of any GILTI as apportioned to California by that combined reporting group.
- 2) GILTI would not be included in a taxpayer's income if either:
  - A) The taxpayer is not a C corporation and the GILTI income is derived from a corporation that is included in a combined reporting group that is doing business, as defined in Sections 23101(a) and (b), in California that does not make a water's-edge election.
  - B) The taxpayer is not a C corporation and the GILTI income is derived from a corporation that is not as part of a combined reporting group doing business in this state, as defined in Sections 23101(a) and (b).

RTC section 25137 provides for an alternative apportionment formula if the taxpayer or the FTB believes the standard apportionment formula does not fairly represent the extent of the taxpayer's business activity in California. If a taxpayer has GILTI income included in its gross income pursuant to this provision of the bill, then the taxpayer may submit a petition to the FTB for alternative apportionment in accordance with the standards and procedures established by the FTB for submission of a petition for alternative apportionment.

Any regulation, standard, criterion, procedure, determination, rule, notice, or guideline established or issued by the FTB to implement this provision is hereby exempted from the rulemaking provisions of the Administrative Procedure Act (APA) (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code (GC)).

The rules within this provision would be severable. If any portion of the provision or its application would be held invalid, that invalidity would not affect the other portions of the bill.

The Legislature's intent is the additional revenue resulting from this provision of the bill would be used for purposes of the BCHA.

*Effective/Operative Date*

This provision would become effective January 1, 2022, and would be operative for taxable years beginning on or after January 1, 2022.

*Federal/State Law*

*Federal Law*

GILTI is defined by IRC section 951A and was enacted by the federal TCJA, effective for taxable years of foreign corporations beginning after December 31, 2017, and for taxable years of US shareholders in which such taxable years of the foreign corporations end. Under existing federal law, any US shareholder that owns at least 10 percent (10%) of the value or voting rights in a CFC must include in gross income for the taxable year its GILTI in a manner generally similar to the inclusion of Subpart F income, regardless of whether any amount is distributed to the shareholder. In general, Subpart F income includes insurance income; foreign base company income; and international boycott factor income, illegal bribes, and income derived from a foreign country listed in IRC section 901(j), which are countries that sponsor terrorism or are otherwise not recognized by the US, such as Iran, Iraq, Libya, and North Korea.

GILTI with respect to any US shareholder for the shareholder's taxable year, is equal to the excess (if any) of the shareholder's net CFC tested income over the shareholder's net deemed tangible income return. The shareholder's net deemed tangible income return equals the excess (if any) of 10 percent (10%) of the aggregate of its pro rata share of the qualified business asset investment (QBAI) of each CFC with respect to which it is a US shareholder over certain interest expense. (Refer to The Joint Committee on Taxation report, JCS-1-18 (December 20, 2018), page 368.)

*State Law*

No provision comparable to state law.

*Implementation Considerations*

None noted.

*Technical Considerations*

None noted.

*Policy Considerations*

None noted.

## **LEGISLATIVE HISTORY**

No legislation similar to this provision of the bill has been identified.

## **PROGRAM BACKGROUND**

None noted.

## **LEGAL IMPACT**

None noted.

### ***Analysis Provision 2 (Sections 2 and 3):***

*CTL Conformity to GILTI, Repatriation Income Provisions, and Limited Use of Tax Credits*

Provision 2, under the CTL, beginning January 1, 2022, would require a water's-edge taxpayer to include 50 percent (50%) of any GILTI, as defined by IRC section 951A, of its affiliated corporations, and 40 percent (40%) of any repatriation income, generally past profits generated by the foreign subsidiaries of US corporations, defined by IRC section 965(a), except as otherwise provided.

With respect to the GILTI, any dividend elimination (100 percent (100%) elimination under RTC 25106 or the 75 percent (75%) dividend received deduction under RTC section 24411) would be allowed using the same rules that apply to dividends received from a CFC under RTC section 25110(a)(2)(A)(ii).

With respect to the included repatriation income, the taxpayer would choose to apportion 14 percent (14%) of that income to California, by an election process in the form and manner prescribed by the FTB, or use the apportionment factor otherwise calculated for the combined group for that taxable year.

In addition, the taxpayer would be entitled to a credit for any taxes already paid on the repatriated income by reason of RTC section 24411 or any other law. The credit allowed would be calculated by multiplying the final tax liability of the taxpayer for the taxable year in which tax was paid on repatriation income by a fraction not to exceed one, the numerator of which is the repatriation income of that corporation for that taxable year and the denominator of which is the total taxable income of that corporation for that taxable year.

Any water's-edge taxpayer that includes GILTI, pursuant to this section, would be permitted to revoke the water's-edge election for the 2022 taxable year.

The provision also provides that total credits, including the carryover of unused credits, otherwise allowable pursuant to Part 10, the PITL, for the taxable year, cannot reduce the additional tax liability added by the inclusion of the GILTI and the repatriation income by more than five million dollars (\$5,000,000). In addition, total business credits, including the carryover of unused credits, otherwise allowable pursuant to Part 11, the

CTL, for the taxable year, cannot reduce the additional tax liability added by the inclusion of the GILTI and the repatriation income by more than five million dollars (\$5,000,000).

For taxpayers included in a combined report, the total of all credits otherwise allowable, including the carryover of any credit, would be applied to the total amount of credits claimed by all members of the reporting group, and cannot reduce the aggregate amount of the additional tax liability of all members of the combined report resulting from the inclusion of the GILTI and the repatriation income by more than five million dollars (\$5,000,000).

The five million dollar (\$5,000,000) limitation under Part 10, the PITL, and the five million dollar (\$5,000,000) limitation under Part 11, the CTL, would not apply to the credit allowed for taxes already paid to this state on repatriated income.

Any amount of business credit otherwise allowable for the taxable year, which is not allowed due to this limitation, would remain a credit carryover and the carryover period would be increased by the number of taxable years the credit or any portion thereof would not be allowed.

For purposes of this provision, all of the following apply.

- 1) "Affiliated corporation" means a corporation that is a member of a commonly controlled group, as defined in section 25105.
- 2) "Business credit" means a credit allowable under any provision of Chapter 2 (commencing with Section 17041) of Part 10, other than the following credits:
  - A) The credit allowed by section 17052, relating to credit for earned income.
  - B) The credit allowed by section 17052.1, relating to credit for a young child.
  - C) The credit allowed by section 17052.6, relating to credit for household and dependent care.
  - D) The credit allowed by section 17052.25, relating to credit for adoption costs.
  - E) The credit allowed by section 17053.5, relating to renter's tax credit.
  - F) The credit allowed by section 17054, relating to credit for personal exemption.
  - G) The credit allowed by section 17054.5, relating to credit for qualified joint custody head of household and a qualified taxpayer with a dependent parent.
  - H) The credit allowed by section 17054.7, relating to credit for qualified senior head of household.
  - I) The credit allowed by section 17058, relating to credit for low-income housing.
  - J) The credit allowed by section 17061, relating to refunds pursuant to the Unemployment Insurance Code.

- 3) "Global intangible low-taxed income" has the same meaning as defined by IRC Section 951A, as enacted by the TCJA, relating to GILTI, but not taking into account any subtractions made pursuant to Treasury Regulations section 1.951A-2(c)(7), allowing an election to exclude of certain income subject to high foreign taxes.
- 4) "Repatriation income" means income that was deemed repatriated under IRC Section 965(a), as amended by the TCJA, relating to treatment of deferred foreign income as subpart F income, as included in a taxpayer's federal return by operation of the payment schedule of IRC section 965(h), as amended by the TCJA, relating to election to pay liability in installments.

Any regulation, standard, criterion, procedure, determination, rule, notice, or guideline established or issued by the FTB to implement this section is hereby exempted from the rulemaking provisions of the APA (Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the GC.)

The rules within this provision would be severable. If any portion of the provision or its application would be held invalid, that invalidity would not affect the other portions of the bill.

The Legislature's intent is the additional revenue resulting from this provision of the bill would be used for purposes of the BCHA.

#### *Effective/Operative Date*

This provision would become effective January 1, 2022, and operative beginning on or after January 1, 2022.

#### *Federal/State Law*

##### *Federal Law*

IRC section 965 imposes a one-time tax on untaxed foreign earnings and profits (E&P) of foreign corporations owned by US shareholders, by deeming those earnings to be repatriated as a Subpart F income. The tax on this repatriated income is 15.5 percent (15.5%) on liquid assets, such as cash and cash equivalents, and 8 percent (8%) on the remaining assets, payable upon election in installments over eight years, regardless of whether companies actually repatriated the foreign earnings from prior years. The repatriation tax is mandatory, and the tax is imposed with respect to deferred foreign E&P without regard to actual distributions.

Federal law allows taxpayers to elect to pay their repatriation tax in annual installments over eight years without the assessment of interest. The election was required with the 2017 tax return. Specifically, the installment due is as follows: 8 percent (8%) per year for the first five years, 15 percent (15%) in year six, 20 percent (20%) in year seven, and 25 percent (25%) in year eight, starting in 2018. The final installment is due in 2025.

Refer to the above sections for the discussion of the federal GILTI rules.

With respect to the tax credits, current federal law does not specify a dollar limit on the total amount of credits that can reduce the tax otherwise due similar to the limit this provision would impose.

### *State Law*

Under state law, corporations deriving income from sources both within and outside California are required to measure their tax liability by reference to their income derived from or attributable to sources within California. To determine the portion of total income that is attributable to California, the apportionment and allocation method is used.

Additionally, all affiliated US and foreign entities comprising a single trade or business are viewed for certain purposes as a whole called a "unitary group." The business income of all the affiliates that comprise a unitary group is apportioned and reported to California on a single report known as the "combined report." This "combined report" also includes any nonbusiness income from the unitary group members that is allocated to California.

The apportionment method uses a formula to calculate the amount of a unitary group's total income that was generated from the unitary group's activities in California. This formula is now comprised of a single sales factor that measures the activity of a unitary group in the state. There is an exception for qualified business activities in agriculture, extraction, savings and loans, and banking. The apportionment formula for these businesses is comprised of four components that measure the activity of the unitary group in the state: property, payroll, and double-weighted sales. The unitary group's California business income is then apportioned among the members that are taxable in California. Allocation rules source nonbusiness income to a state, depending on the type of income. Any nonbusiness income that is allocated to California is then added to that entity's taxable income. Each member retains a separate tax identity and liability.



California law allows a unitary group to elect the option of calculating its California income and activities on a water's-edge basis in lieu of combining on a worldwide basis. A water's-edge election requires that the taxpayers file on a water's-edge basis for at least 84 months. Water's-edge electors generally can exclude foreign-organized affiliated entities that are otherwise part of a unitary group from the combined report. However, the water's-edge rules require that the income and apportionment factors of certain foreign-organized affiliated entities be included, fully or partially, in the apportionable income and apportionment factors of the water's-edge group. Lastly, any foreign income that is effectively connected to a US trade or business must also be included in the water's-edge combined report.

California law provides the water's-edge group a deduction of 75 percent (75%) of qualifying dividends received from its foreign affiliates. This deduction is known as the "foreign dividend deduction." A 100 percent (100%) deduction is provided for dividends from certain foreign construction projects.

In addition, pursuant to RTC section 23036.3, state law provides that the amount of allowable business credits for a corporation is limited to five million dollars (\$5,000,000) for taxable years beginning on or after January 1, 2020, and before January 1, 2023. For taxpayers included in a combined report, this determination is made at the group level. In addition, the carry-forward period for tax credits subject to the limitation are increased by the number of taxable years that the credit was not allowed by operation of this limitation.

The Low Income Housing Credit is excluded from the credit limitation. The amounts included in an election under RTC section 6902.5 that apply to film credits against qualified sales and use tax are also excluded from the credit limitation.

### *Implementation Considerations*

Department staff has identified the following implementation considerations for purposes of a high-level discussion; additional considerations may be identified as the bill moves through the legislative process. Department staff is available to work with the author's office to resolve these and other concerns that may be identified.

This provision allows a taxpayer to choose to apportion 14 percent (14%) of repatriated income to California or apply the apportionment factor of the combined group, and the election process would be completed in the form and manner prescribed by the FTB. However, the bill does not specify whether the election would be irrevocable. It is recommended that this provision be amended to clarify that the annual election would be an irrevocable election.

The bill provides that the taxpayer would be entitled to a credit for any taxes already paid on the repatriated income by reason of RTC section 24411 or any other law. The term “any taxes already paid” is very broad. It may be helpful to amend the bill to clarify what the term includes, e.g., foreign, federal, or other state taxes; taxes paid to California.

The bill provides a five million dollars (\$5,000,000) tax credit limitation. However, the amendments to RTC section 23036.3 could be interpreted to provide a limitation for “net tax” and a separate limitation for the increase in tax liabilities related to the inclusion of GILTI and the repatriation income as provided by the provisions of this bill. Also note the current credit limitation under subdivision (a) of RTC section 23036.3 applies for each taxable years beginning on or after January 1, 2020, and before January 1, 2023, while the credit limitation under subdivision (b) of RTC section 23036.3 does not have an operative date, for example, “taxable years beginning on or after January 1...,” or a sunset date. If this is not the author's intent, the author may wish to amend the bill.

#### *Technical Considerations*

For consistency of terminology, the following changes are recommended:

In SEC. 3., Section 25110.1(a), replace “Beginning January 1, 2022,...” with “For taxable years beginning on or after January 1, 2022,...”.

In SEC. 3., Section 25110.1(b), replace “Beginning January 1, 2022,...” with “For taxable years beginning on or after January 1, 2022,...”.

#### *Policy Considerations*

Note that unless repealed, GILTI is an on-going US tax on foreign affiliates. However, the repatriation tax was a one-time mandatory tax where the taxpayer could elect to pay the tax over annual installments. Thus, after 2025, these payments will no longer occur. The author may wish to amend the bill to provide a sunset date.

#### **LEGISLATIVE HISTORY**

AB 85 (Committee on Budget, Chapter 8, Statutes of 2020) amongst other things, for taxable years 2020, 2021, and 2022, under the CTL, requires that tax credits reduce tax liability by no more than five million dollars (\$5,000,000). This provision also extended the credit carryover period for credits disallowed under this provision.

#### **PROGRAM BACKGROUND**

None noted.

## **LEGAL IMPACT**

None noted.

### **Analysis Provision 3 (Section 9):**

#### *FTB Reporting Requirements*

This provision, under the WIC, would require the FTB, in consultation with the DOF, to provide revenue information related to the provisions of this bill to the Controller.

No later than June 1, 2022, FTB shall estimate the amount of revenue that would have resulted if the provisions of this bill had applied to taxable years beginning on or after January 1, 2021, and before January 1, 2022, and notify the Controller of that amount.

No later than June 1, 2023, and annually thereafter, the FTB, in consultation with the DOF, shall estimate the amount of additional revenue resulting from the application of the provisions of this bill for the taxable years beginning on or after January 1 of the calendar year immediately preceding the year in which the estimate is made, and before January 1 of the year in which the estimate is made, and notify the Controller of that amount.

When implementing the BCHA, the Homeless Coordinating and Financing Council (Council) shall establish a division to implement the auditing, monitoring, technical assistance, administration, and training activities described in this chapter that is separate from the coordinating activities of the Council, as described in WIC section 8257. The Council would be required to work collaboratively with other departments to address share responsibilities in implementing, overseeing, and evaluating the BCHA, including the reporting requirements of the FTB in consultation with the DOF.

The bill provides an exception from the general disclosure provisions, pursuant RTC section 19542, to specifically allow the FTB to comply with the above reporting requirements.

#### *Effective/Operative Date*

This provision would be effective and operative on January 1, 2022.

#### *Federal/State Law*

Existing California state laws require the FTB to report certain information to the California Legislature or other state agencies, as directed. Additionally, for both federal and state purposes, the disclosure of any confidential taxpayer information is prohibited, except as specifically authorized by statute.

### *Implementation Considerations*

This provision would require the FTB to provide a revenue estimate to the Controller and revenue data to the DOF by certain due dates. However, the department would not have the specific data by the required reporting dates. The earliest the FTB can provide data for a tax year is generally one year after the original due date of the return for individuals, and one year after the extended due date of the return for corporations. For example, for corporations, the extended due date for the 2022 tax year would generally be November 15, 2023; thus, the FTB would not have reporting data until December 2024. The author may wish to amend the bill to change the due dates of the reporting requirements to allow the department to collect the necessary data.

### *Technical Considerations*

In SEC. 9., Section 13051, subdivision (p) of the WIC, it is recommended that the duplicate "the" be removed.

### *Policy Considerations*

None noted.

### **LEGISLATIVE HISTORY**

No legislation similar to this provision of the bill has been identified.

### **PROGRAM BACKGROUND**

None noted.

### **LEGAL IMPACT**

None noted.

### **FISCAL IMPACT (All Provisions)**

The provisions of this bill may significantly impact the department's systems, which could require additional resources, such as staffing and costs related to programming; systems and processing revisions; new forms, forms and form instruction revisions; FTB reporting requirements; and needed taxpayer outreach. As the bill continues to move through the legislative process, costs will be identified, and a budget change proposal will be requested, if necessary.

**ECONOMIC IMPACT (All Provisions)**

*Revenue Estimate*

This bill would result in the following revenue gain.

Estimated Revenue Impact of AB 71, as Amended, March 25, 2021  
Assumed Enactment after June 30, 2021

*Summary Revenue Table (\$ in Millions)*

| <b>Fiscal Year</b> | <b>Revenue</b> |
|--------------------|----------------|
| 2021-2022          | \$310          |
| 2022-2023          | \$950          |
| 2023-2024          | \$950          |
| 2024-2025          | \$600          |

This analysis does not account for changes in employment, personal income, or gross state product that could result from this bill or for the net final payment method of accrual.

*Revenue Discussion*

This bill, under CTL, requires water’s-edge filers to take into account fifty percent (50%) of GILTI, and forty percent (40%) of repatriation income, sets the credit usage limit to five million dollars (\$5,000,000) of tax liability, and, under the PITL, requires GILTI to be included in gross income.

The analysis identified corporate taxpayers that reported either GILTI or repatriation income on their federal tax returns. Their tax for 2018 was recalculated using proposed law. This process was repeated to account for differences in tax law across years such as the suspension of net operating losses in 2022, the increase in repatriation installment payments in 2022, 2023, and 2024, and the end of those installment payments in 2025. For each tax year, the 2018 results estimated with that year’s law was adjusted to reflect the estimated size of the economy in the applicable year and those results were fiscalized.

**APPOINTMENTS (All Provisions)**

None provided.

**SUPPORT/OPPOSITION (All Provisions)**

*Support for the Bill*

As per the 4/16/21 Assembly Revenue and Taxation analysis of AB 71, the following organizations support this bill.

Aapis for Civic Empowerment Education Fund  
Alexandria House  
All Home  
Alliance for Children's Rights  
Alliance of Californians for Community Empowerment Action  
American Family Housing  
American Indian Movement SoCal  
Bay Area Community Services  
Bay Area Regional Health Inequities Initiative  
Bend the Arc: Jewish Action, Southern California  
Bet Tzedek  
Brilliant Corners  
California Council of Community Behavioral Health Agencies  
California Association of Student Councils  
California Calls  
California Coalition for Rural Housing  
California Coalition for Youth  
California Democratic Party Renters Council  
California Housing Consortium  
California Housing Partnership Corporation  
California Partnership to End Domestic Violence  
California Rural Legal Assistance Foundation  
Center for Community Action & Environmental Justice  
Central Hollywood Neighborhood Council  
Children Now  
Chrysalis Center  
City of Los Angeles  
City of Oakland  
Coalition on Homelessness, San Francisco  
Community Action Marin  
Community Corporation of Santa Monica

Community Forward Sf, INC.  
Community Solutions for Children, Families and Individuals  
Conard House  
Corporation for Supportive Housing  
County of Los Angeles  
County of Santa Clara  
Del Rey Neighborhood Council  
Destination: Home  
Dignity oves  
Disability Rights California  
Downtown Women's Center  
East Bay Asian Local Development  
East Bay Housing Organizations  
Episcopal Community Services of San Francisco  
Everyone Home  
Foster Care Counts  
Hathaway-sycamores  
Hayward; City of  
Hope Solutions  
Hopics  
Housing Authority of the City of Oakland  
Housing California  
Housing Consortium of the East Bay  
Housing Is a Human Right OC  
Housing Now! CA  
Interface Children & Family Services  
Jewish Family Service San Diego  
John Burton Advocates for Youth  
Justice in Aging  
LA Care Health Plan  
Linc Housing  
Los Angeles County Chief Executive Office  
Los Angeles Homeless Services Authority  
Lyric  
Me Too Survivors' March International  
Mental Health America of Los Angeles  
Mogavero Architects

Multi-faith Action Coalition  
Mutual Housing California  
National Alliance to End Homelessness  
National Association of Social Workers, California Chapter  
Non Profit Housing Association of Northern California  
Northeast Valley Health Corporation  
Oakland Homeless Advocacy Working Group  
Open Heart Kitchen  
Operation Dignity INC  
Operations Checks & Balances  
People's Budget Orange County  
Policylink  
Prevention Institute  
Progressive Asian Network for Action  
Project: Peacemakers, Incorporated  
Public Advocates INC.  
Public Law Center  
Rainbow Services, Ltd.  
Regional Task Force on The Homeless  
Sacramento Homeless Organizing Committee  
Safe Place for Youth  
San Diego Housing Federation  
San Francisco Bay Area Planning and Urban Research Association (SPUR)  
San Francisco Board of Supervisors  
San Francisco Youth Commission  
San Ysidro Health  
Silicon Valley Sponsoring Committee  
Skid Row Housing Trust  
South Bay Community Land Trust  
Spa 6 Homeless Coalition  
SSG-Homeless Outreach Program Integrated Care System  
St. Joseph Center  
St. Joseph's Family Center  
St. Mary's Center  
Starting Over INC.  
Steinberg Institute  
Stronger Women United



Silicon Valley at Home Action Fund  
Tenderloin Neighborhood Development Corporation  
The Center for Common Concerns/Homebase  
The Kelsey  
The Kennedy Commission  
The People Concern  
The San Francisco Housing Accelerator Fund  
The Women's Building  
The Women's Foundation of California  
Time for Change Foundation  
Union Station Homeless Services  
United Way of Greater Los Angeles  
Urban Initiatives  
Weingart Center Association  
West Sacramento; City of  
West Valley Community Services  
Western Center on Law & Poverty  
Women's Foundation California  
YWCA

*Opposition for the Bill*

As per the 4/16/21 Assembly Revenue and Taxation analysis of AB 71, the following organizations oppose this bill.

Advanced Medical Technology Association  
Bay Area Council  
Bizfed Central Valley  
California Association of Winegrape Growers  
California Attractions and Parks Association  
California Beer and Beverage Distributors  
California Building Industry Association  
California Business Properties Association  
California Cable and Telecommunications Association  
California Cattlemen's Association  
California Chamber of Commerce California Fuels and Convenience Alliance  
California Hotel & Lodging Association  
California Independent Petroleum Association

California League of Food Producers  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Mortgage Bankers Association California New Car Dealers Association  
California Railroad Industry  
California Restaurant Association  
California Retailers Association California Taxpayers Association  
California Trucking Association  
Contra Costa Taxpayers Association  
Council on State Taxation  
Family Business Association of California  
Greater Irvine Chamber of Commerce  
Greater San Fernando Valley Chamber of Commerce  
Kern County Taxpayers Association  
North Orange County Chamber of Commerce  
Orange County Business Council  
Orange County Taxpayers Association  
Oxnard Chamber of Commerce  
Personal Insurance Federation of California  
San Gabriel Valley Economic Partnership  
Securities Industry and Financial Markets Association  
Silicon Valley Leadership Group  
Technet  
Tri County Chamber Alliance  
West Coast Lumber & Building Material Association  
Western Growers Association  
Western Manufactured Housing Communities Association  
Western States Petroleum Association  
Wine Institute

**ARGUMENTS (All Provisions)**

To be determined.

**LEGISLATIVE CONTACT**

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