The single-subject rule should be fatal to trailer bills

Overview

Each year, California's legislature enacts dozens of trailer bills to implement the state budget — and all likely are unconstitutional. Trailer bills are described as "a fairly outrageous assault on the legislative process,"[1] or as "half-baked bills written behind closed doors."[2] Even the state's high court has characterized fiscal legislation as "particularly susceptible to abuse."[3] The constitutional problem is that adopting substantive policy bills within larger trailer bills spanning countless topics violates the single-subject rule. Other states have express permission in their state constitutions for similar budget-implementing legislation. California does not, and the state's courts have yet to strike down the entire practice. They should start now.

Analysis

Trailer bills are difficult to square with the state constitution

Trailer bills are a key legislative device every year. The 2026–27 May Revision included at least 82 proposed trailer bills[4] — though not all were necessarily included in the 20 separate omnibus bills tacked onto this June's budget package.[5] This long-standing practice arguably violates the single-subject rule.

The rule is imposed by California's constitution, which requires that "a statute shall embrace but one subject, which shall be expressed in its title." [6][7] No bill is exempt from that stricture. Yet trailer bills often amend dozens of code sections at once. The California Supreme Court's attempt to resolve the tension between the single-subject rule and trailer bills in *Harbor v. Deukmejian* left a wide-open door for the legislature to run through.[8] Modern scholars have described the rule as a "structural nullity" which has "few, if any teeth."[9]

The case-by-case test for trailer bills is the wrong approach

In *Harbor*, the California Supreme Court adopted a new single-subject test:

- A bill's provisions must be either functionally related to one another, or they must be reasonably germane to each other and to the subject of the bill, as expressed in its title.[10]
- No bill may adopt an excessively general topic.[11]

A trailer bill that met that standard passed muster. Yet this case-by-case rule was the wrong approach, because a trailer bill, by definition, embraces more than one subject.

Trailer bills should fail even the most accommodating reading of the single-subject rule

Even measured against the *Harbor* soft reading of the rule, trailer bills cannot pass.

The state constitution contains two single-subject provisions, which control both policy legislation and initiative measures. The first is in article IV, section 9, dating to the 1849 Constitution; the second appeared in 1948, and sits in article IV, section 8(d).

The California Supreme Court defines the single-subject rule's purpose as "the regulation of legislative procedures: the avoidance of log-rolling by legislators in the enactment of laws."[12] Other cases about the single subject rule agree,[13] with the rule also functioning to ensure legislators and the public receive reasonable notice of the contents of a statute.[14]

The operative test interrogates whether the bill or measure's provisions are "reasonably germane to a common theme, purpose, or subject."[15] California courts interpret this broad requirement quite loosely, [16] finding that a provision meets the germaneness requirement if it "conduces to the act, or which is auxiliary to and promotive of its main purpose or has a necessary and natural connection with such

purpose." [17]

Specifically, the California Supreme Court permits the Legislature to combine provisions in a single act that are "governing projects so related and interdependent as to constitute a single scheme,"[18] where "provisions auxiliary to the scheme's execution may be adopted as part of that single package."[19] State courts have thus declined to require that the provisions "interlock into a functional relationship."[20] Nor have California courts drilled down into what "subject" even means, prompting scholars to describe it as "one quantum more specific than 'doing good.'"[21]

It is true that the common purpose uniting provisions "cannot be so broad that a virtually unlimited array of provisions could be considered germane thereto."[22] Yet, the state Supreme Court has described an intent to "not unduly restrict the Legislature's or the people's right to the provisions in a single bill or initiative."[23]

Even the first challenge levied on the basis of the single-subject rule revealed as much; the California Supreme Court upheld the law, stating that the constitutional requirement "is merely directory, and does not nullify laws passed in violation of it."[24] More recently, the court described the inquiry as an "accommodating and lenient" rule meant not to "unduly restrict . . . the people's right to package provisions in a single bill or initiative."[25] These are not particularly strong guardrails.

Worse, courts have applied these amorphous rules softly. For instance, Proposition 21 drew a single-subject rule challenge empowering prosecutors to file charges against minors in adult criminal court, while directing most other changes toward gang violence. The California Supreme Court rejected the challenge, holding that the measure did not violate the single-subject rule because the challenged provision about charging children as adults neither reallocated judicial power nor "accomplish[ed] such a fundamental change in the law that this provision must be considered a single subject."[26] Reasonable minds may differ, but whether charging 14-year-olds as adults falls under a single subject alongside increased robbery

sentences and gang registration requirements is debatable.

The same occurred with Proposition 140, a measure that packaged term limits alongside myriad changes — the court held that its various provisions were germane to the topic of incumbency reform.[27] So too for 1982 Proposition 8, the "Victim's Bill of Rights:" the court upheld an initiative covering topics ranging from insanity defenses to safe schools, finding that the measure protected victims and would-be victims.[28] Even a measured united under "political practices" escaped designation as over-broad where it comprised 20,000 words across campaign spending, lobbyist activities, voter pamphlets, and more.[29]

This is not unusual. Rather, judicial action motivated by the single-subject rule is reserved for much more extreme cases.

California courts have only wielded the single-subject rule against the most sprawling changes to statute. When 2000 Proposition 24 attempted to transfer reapportionment power from the legislature to the state high court, that same court struck it from the ballot.[30] The measure's provisions failed the reasonable germaneness inquiry because they "instead embrace[d] at least two separate and unrelated subjects," namely reapportionment power and legislator pay.[31] Because the distinction between subjects was so stark, the court reasoned that a "clear expression of the voters' intent" was "essential" as to each subject.[32]

But make no mistake: the court's action against Proposition 24 does not mean that it has actively enforced the single-subject rule — particularly against trailer bill challenges. Held against the standard just described, trailer bills should fail.

Their only unifying theme is their fiscal nature. But budget implementation is not a single subject in the sense illustrated by the cases just described. On the contrary, the very nature of a hundred-plus-provision omnibus bill arguably reflects "separate and unrelated subjects" as in *Jones*. The subject of budget implementation thus describes a *vehicle* for legislation, not a *subject*.

This says nothing about what a bill proposes to accomplish, introducing the danger

warned against by *Manduley* and *Jones*: a subject so broad that a "virtually unlimited array of provisions could be considered germane thereto."[33] Unlike the term limits introduced in *Eu*, the topic of budget implementation naturally excludes little, even if it is constrained to a subject like transportation or human services.

After all, nearly every operation administered by the state requires an appropriation. Of course, the court does not necessarily permit "budget relatedness" as a topic in and of itself. The line lies somewhere between the impermissible subject of "fiscal affairs" and the sufficiently narrow subject of "budget balancing."[34]

Courts have not invalidated a trailer bill since *Harbor*

Even if doctrine should condemn trailer bills, California courts have consistently refused to do so. If the single-subject rule is flexible as applied to initiatives and policy bills, its application to trailer bills is entirely contortionist.

California courts since 1987 have cited *Harbor* to preserve — rather than strike down — challenged trailer bills.[35] One article[36] found that the California Supreme Court has considered at least 69 single-subject challenges and only invalidated a legislative act eight times[37] and invalidated an initiative twice.[38] Before *Harbor*, the last time a court used the single-subject rule to invalidate a legislative act was in 1916.[39] Why are California courts so reticent to levy this rule against trailer and other bills?

There are many likely reasons for this, and at least part of the explanation is a structural consequence of *Harbor*: The legislature divides budget-enacting legislation into dozens of omnibus bills separated by topic, making germaneness easier to find.[40]

But the more compelling motivator may be pragmatism. Invalidating a budget in the middle of the year would be more destabilizing than invalidating a policy bill or initiative. After all, budget deadlines are not flexible: the California constitution requires a balanced budget to pass by June 15,[41] in anticipation of the new July 1 fiscal year. Invalidating a statute that the legislature found necessary for enacting

its approved budget might also implicate the separation of powers. After all, invalidating even a single omnibus bill in one subject area could torpedo necessary changes in dozens of code sections. This disincentivizes courts and stakeholders alike from applying the single-subject rule.

The test is too generous because every trailer bill meets it

Recent challenges show that although trailer bills should not survive single subject analysis, courts' malleable application of the rule ensures that they all survive.

For example, the Court of Appeal rejected a single-subject challenge to a trailer bill dissolving about four hundred redevelopment agencies. [42] Citing *Harbor*, the court found germaneness between the act's title describing redevelopment statutes and its purpose in addressing a fiscal crisis.[43] The court permissively allowed a trailer bill to restructure local governments, dependent on a flexible reading indicating that such effect would relate to cutting costs. Because the subject — redevelopment agencies — was sufficiently narrow, the court left the bill intact.

Another Court of Appeal decision cited *Harbor* in rejecting a single-subject challenge to a budget bill provision, finding germaneness between the bill's title and recycling fund loan provisions.[44] Though not a trailer bill, this reflects a judicial application of *Harbor* that is flexible in seeking a functional relationship between a bill's subject and effect. Other single-subject challenges to budget bills led *Harbor*-applying courts to the same conclusion.[45] Thus, courts' tendency to invoke *Harbor* liberally exemplifies why no *Harbor* trailer bill challenges have succeeded since the namesake case. And it suggests that such trailer bill challenges likely will face similar difficulty if brought soon before the court.

This standard excludes little. If anything, courts appear to invoke *Harbor* to justify a challenged budget-related bill, rather than to rigorously examine it.

Some recent trailer bills illustrate why. The 2017–18 public safety omnibus drew criticism[46] for provisions that some regarded as substantive and outside of its stated subject. The bill made changes predictable for a trailer bill, requiring the Judicial

Council to report on revenue collected by courts from criminal misdemeanor fines.[47] The bill also expanded the categories of persons prohibited from purchasing or owning a firearm to those convicted of certain misdemeanors and those with outstanding warrants.[48] The latter provision arguably appears much more directed at policy than budget — perhaps emblematic of the log rolling that *Harbor* sought to stamp out.

But if this provision were to be challenged under current law, it would be no more improper than most other trailer bills: the bill mostly embraces a single subject area, and the gun control provision relates (albeit loosely) to the subject expressed in its title. Here, the *Harbor* single subject test is not narrow enough to discern between budgetary provisions — like court fine accounting — and firearm ownership policy.

Consider the 2021–22 state government trailer bill.[49] Now chaptered, the enormous bill carried sixty-two sections across many subjects. It extended new labor protections to goat herders working in California under the federal H-2A visa program by defining a "goat herder" under the labor code, creating parity with sheep herders.[50] It also established trust accounts for foster youth, under the HOPE for Children program supported by that year's budget. [51]

The divergence between these topics drew suspicion from some legislators. When the bill came before Senate Budget and Fiscal Review, Senator Jim Neilsen remarked that "California law requires no more than one subject…[but] in the health omnibus bill, it's called general government, and there are all kinds of provisions in here: goat herders, sheep herders, Fi$Cal…"[52] The Department of Finance responded that the operation of state government is the "thread" that goes through "each of those issues."[53] That is at best lip service to the spirit of the single-subject rule or the letter of *Harbor*.

Courts may also fail to enforce germaneness because that standard is too permissive. Recall the title of the trailer bill at issue in *Harbor*: "fiscal affairs." Though the court found it overly general, the state disagreed. California argued that the title was appropriate because the goal of the bill was "to make statutory

adjustments which relate to the ongoing allocation of state funds appropriated annually in the budget bill, within the state program so funded."[54] Courts after *Harbor* tend to agree with this assessment, declining to strike down trailer bills as excessively general.

The result is that *Harbor*'s test is not discerning enough to separate budget housekeeping from freewheeling policy changes, at least as manifested in trailer bills. Consider the most recently chaptered trailer bill in the human services area. AB 152 is described simply: "Committee on Budget. Human services."[55] This bill touches the Government, Health and Safety, and Welfare and Institutions Codes to amend community care programs, information technology, departmental reporting requirements, and county CalFresh administrative funding contributions. None of these subjects are reflected in the subject of the bill, despite *Harbor*'s requirements. This is probably permissible: current law only requires germaneness within a subject area to *exist*, not that it be strong.

Both Oklahoma and New York contemplate budget-enacting legislation in their state constitutions, and California should too

California is a national outlier. Only about 13 states use some form of recurrent budget-enacting legislation separate from the budget bill, and only three concentrate that drafting power in their governor.[56] But several states show it can be done better.

Oklahoma's constitution includes a separate single-subject requirement for appropriation bills. The Oklahoma constitution not only constrains general appropriation bills to certain types of expenses but creates a separate single-subject rule for budget-enacting legislation. It requires that "[a]ll other appropriations shall be made by separate bills, each embracing one subject."[57] This scheme empowers the Oklahoma Supreme Court to analyze single subject challenges more stringently.

At first glance the Oklahoma Supreme Court's single-subject inquiry looks even softer than California's. Since 1948 that court has required that every legislative act be initially presumed constitutional, and that an act only contains multiple subjects

when “by no fair intendment” can its topics “be considered as having any legitimate connection with or relation to each other.”[58] Yet that court struck down a special appropriation bill combining funding for multiple state agencies because the uniting themes between the agencies were not “readily manifest.”[59] Oklahoma’s Supreme Court has rejected multiple budget-related bills that mixed appropriations for different goals and entities.[60]

Because Oklahoma’s constitution sets out a single-subject rule for budget-related legislation, its courts are empowered to apply the rule to such acts. New York offers a similar scheme.

In 1915 New York convened a constitution convention that proposed to center budget-drafting responsibility in the executive branch. [61] Like *Harbor*, the change meant to dethrone log-rolling and pork barrel politics as the chief methods of state budget preparation.[62] Voters rejected it in 1915, but approved a revised version in 1927.[63] By 1938 the New York constitution directed the governor to submit “recommendations as to proposed legislation, if any, which the governor may deem necessary to provide moneys.”[64] This appears superficially similar to California’s system.

Like the Oklahoma constitution, New York’s charter includes separate rules for budget-enacting legislation. Similar to the single-subject rule, Section 6 requires that “no appropriations shall be made except by separate bills, each for a single object or purpose.”[65] This operates in tandem with Section 4, which requires that legislative additions to a governor’s proposed budget bill be “stated separately and distinctly from the original terms of the bill and refer each to a single object or purpose.”[66] Like California, this bar seems intended to prevent “the legislative practice of tacking onto budget bills propositions that have nothing to do with money matters.”[67]

While California courts hunt for germaneness between the challenged provisions of a trailer bill and its budget-related subject, New York’s constitution empowers its

courts to scrutinize how close that relationship is. For instance, a 2018 appellate decision upheld a new compensation-review commission created by a budget bill — only because its purpose tied directly to specific appropriations included in the budget. [68]

If California added a textual category for trailer bills in its constitution, courts would no longer need to ask whether a provision is "reasonably germane" to a subject area, likely making *Harbor* obsolete. But five years after *Harbor*, California voters rejected the state's attempt accomplish as much. Proposition 169 would have permitted a single annual budget-implementation bill tied directly to spending authority specified in the budget.[69] Proponents argued that it would eliminate "last minute horse-trading," where special interests hold some trailer bills hostage to gain ground on others.[70]

Opponents of the measure successfully appealed to voter fears that bundling separate fiscal policies would reduce political accountability and lead to sneaky tax increases.[71] But *Harbor* did not end the practice of bundling fiscal legislation; it instead encouraged lawmakers to work around the germaneness requirement by multiplying the volume of fiscal legislation. Compared to the five subjects New York divides its budget-enacting bills into, California passed sixteen different omnibus bills in the last budget cycle.[72]

Only five years after *Harbor*, the Court of Appeal remarked that "trailer bills are generally separated by subject area such as education, resources, or health, to minimize possible conflicts with single subject limitations."[73] Weighed against New York's system, California's trailer bills appear more difficult to track and analyze, owing to their sheer number.

The Oklahoma and New York systems confirm that California's trailer bill problems are not inevitable. They are the predictable byproduct of the state's choice to leave its courts to justify a necessary but inevitably unconstitutional practice. Adopting constitutional amendments specifying trailer bills' scope would empower courts to assess their fit under the single-subject rule — rather than forcing the single-subject

rule to fit around trailer bills. Arizona shows how this works.

California would benefit from Arizona's extended timelines for courts to invalidate questionable trailer bills

While California courts have molded the *Harbor* germaneness standard to preserve questionable trailer bills, Arizona's courts go the other direction. In 2021 an Arizona trial court vacated 58 provisions of budget-implementing statute changes, distributed across four budget reconciliation bills (analogous to California's omnibus bills) for violating the state's version of the single-subject rule.[74] The Arizona Supreme Court agreed, rejecting a fifty-two-section measure spanning topics like dog-racing, a school mask-mandate ban, and election law. Arizona courts demonstrate a greater willingness to apply their single-subject inquiry with vigor.

Arizona's attitude owes much to the state's constitutional budget requirements. Arizona's budget deadlines are not binding in the same way California's are. Though Arizona legislators must pass an annual budget, they do not face a real recurring deadline to do so. They do face the risk of a government shutdown if funding is not allocated by the start of the July 1 fiscal year, but it is not a constitutional requirement. By contrast, California's constitution requires a balanced budget be passed by June 15, or legislators may lose pay.[75] Consequently, Arizona has passed over its deadline into a shutdown multiple times. In 2023 legislators failed to adjourn until July 31, over a month after the fiscal year ended.[76]

And Arizona's budget-implementing bills do not take effect immediately, which provides a time cushion California does not enjoy. Because it assumes budget resolution bills contain substantive law changes, Arizona's constitution requires they go into effect ninety days after the legislature adjourns, like a normal policy bill.[77] This three-month window provides time for the state's referendum process.[78] Arizona's constitution does provide for urgency statutes (which are not subject to referenda) but budget bills are not classified as urgency statutes.[79] This gap also separates trailer bills from the legislative rush created by the end of the budget cycle, and the end of legislative session following nearly a month later. This could

bolster political accountability by providing more time for review and negotiation.

Admittedly, this system would be difficult to implement in California given the need for constitutional changes. To delay trailer bills, the state would probably need to loosen or even ignore the June 15 deadline, neither of which appears likely. Regardless, the examples provided by other states confirm that California's trailer bill problem is resolvable. Rather than relying on courts to bend existing case law around practically necessary but constitutionally infirm trailer bills, California could amend its constitution to provide courts with a clearer framework.

Conclusion

California courts have contorted the single-subject rule to accommodate the legislature's trailer bill practice, when a proper application of the constitutional rule would ban such bills entirely. Worse, courts have declined to enforce even the weak *Harbor* standard against challenged trailer bills. The result is a far more permissive single-subject rule than the state constitution or the state's high court contemplated. This situation is ripe for abuse and calls for reform. California should look to how other states resolve similar tensions and revisit a doctrine that has been problematic for 40 years.

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1. The Capitol Connection, *Ripped from the headlines*, (2022). ↑
2. Jakob Evans, *Sierra Club Statement on Passage of Trailer Bills*, Sierra Club (2025). ↑
3. *Planned Parenthood v. Swoap* (1985) 173 Cal.App.3d 1187, 1198. ↑
4. 2026-27 May Revision Trailer Bill Language, Cal. Dep't of Finance (2026). ↑
5. 2026 Cal. Legis. Serv. Ch. 21 (S.B. 111); 2026 Cal. Legis. Serv. Ch. 79 (S.B. 135); 2026 Cal. Legis. Serv. Ch. 25 (A.B. 150); 2026 Cal. Legis. Serv. Ch. 26 (A.B. 152); 2026 Cal. Legis. Serv. Ch. 80 (S.B. 163); 2026 Cal. Legis. Serv.

Ch. 27 (S.B. 164); 2026 Cal. Legis. Serv. Ch. 61 (S.B. 165); 2026 Cal. Legis. Serv. Ch. 62 (S.B. 166); 2026 Cal. Legis. Serv. Ch. 81 (S.B. 168); 2026 Cal. Legis. Serv. Ch. 82 (S.B. 169); 2026 Cal. Legis. Serv. Ch. 28 (S.B. 170); 2026 Cal. Legis. Serv. Ch. 82 (S.B. 171); 2026 Cal. Legis. Serv. Ch. 84 (S.B. 172); 2026 Cal. Legis. Serv. Ch. 29 (S.B. 174); 2026 Cal. Legis. Serv. Ch. 64 (S.B. 177); 2026 Cal. Legis. Serv. Ch. 68 (A.B. 179); 2026 Cal. Legis. Serv. Ch. 85 (S.B. 180); 2026 Cal. Legis. Serv. Ch. 66 (A.B. 181). ↑

6. Some argue the single subject rule has Roman origins. *See Planned Parenthood*, 173 Cal.App.3d 1187 at n.7 (describing the Roman Lex Caecillia Dida, in 98 B.C., which prohibited bills containing unrelated provisions). ↑

7. Cal. Const. art. IV § 9. ↑

8. *Harbor v. Deukmejian* (1987) 43 Cal.3d 1078, 1103. ↑

9. David A. Carrillo et al., *California Constitutional Law: Direct Democracy* (2019) 92 Southern Cal. Law Review 615. ↑

10. *Harbor*, 43 Cal.3d. at 1109. ↑

11. *Id.* ↑

12. *Habor*, 43 Cal.3d at 1094. ↑

13. *See, e.g., League of Women Voters, et al. v. March Fong Eu, Pete Wilson* (1992) 7 Cal.App.4th 649, 667; *Kennedy Wholesale v. State Bd. of Equalization* (1991) 53 Cal.3d 245, 249. ↑

14. *Harbor*, 43 Cal.3d at 1096. ↑

15. *Brown v. Superior Court* (2016) 63 Cal.4th 335, 350. ↑

16. *Id.* ↑

17. *See Evans v. Superior Court* (1932) 215 Cal. 58, 62. ↑

18. *Harbor*, 43 Cal.3d. at 1097. ↑

19. *Id*. ↑

20. *Briggs v. Brown* (2017) 3 Cal.5th 800. ↑

21. David A. Carrillo et. al, *Popular Sovereignty* (2017) 68 Hastings L.J. 1208. ↑

22. *Manduley v. Superior Court* (2002) 27 Cal.4th 547, 578 (quoting *Senate of the State of Cal. v. Jones* (1999) 21 Cal.4th 1142, 1157). ↑

23. *Californians for an Open Primary v. McPherson* (2006) 38 Cal.4th 735, 764. ↑

24. *Washington v. Page* (1854) 4 Cal. 388, 389. ↑

25. *Briggs,* (2017) 3 Cal.5th at 829 (paraphrasing *FPPC v. Superior Court* (1979) 25 Cal. 3d 33, 39). ↑

26. *Manduley*, 27 Cal.4th at 582. ↑

27. *Legislature of the State of Cal. v. March Fong Eu* (1991) 54 Cal.3d 492, 545. ↑

28. *Brosnahan v. Brown* (1982) 32 Cal.3d 236, 242-245. *See also Raven v. Deukmejian* (1990) 52 Cal.3d 336, 342–45. ↑

29. *FPPC v. Superior Court* (1979) 25 Cal.3d 33, 37–40. ↑

30. *Senate of the State of Cal. et al. v. Jones*, 21 Cal.4th 1142 (1999). ↑

31. *Id.* at 1146. ↑

32. *Id.* at 1167–68. ↑

33. *Manduley*, 27 Cal.4th at 578. ↑

34. *Harbor,* 43 Cal.3d. 1078 (over-broad “fiscal affairs” topic); *League of Women Voters* (1992) 7 Cal.App.4th 649 (sufficiently narrow subject of budget balancing). ↑

35. *See, e.g. Howard Jarvis Taxpayers Assn. v. Weber* (2021) 67 Cal.App.5th 488; *Prf'l Engr's in Cal. Gov't v. Brown* (2014) 229 Cal.App.4th 861; *City of Cerritos v. State of Cal.* (2015) 239 Cal.App.4th 1020. ↑

36. Carrillo et al., *California Constitutional Law: Direct Democracy* at 629. ↑

37. *See* Carrillo et al., *California Constitutional Law: Direct Democracy* at 629. *See also Harbor*, 43 Cal.3d 1078; *Williams v. Carver* (1916) 171 Cal. 658; *Westinghouse Elec. & Mfg. Co. v. Chambers* (1915) 169 Cal. 131; *Sullivan v. Gage* (1905) 145 Cal. 759; *Murray v. Colgan* (1892) 94 Cal. 435. ↑

38. *Wallace v. Zinman* (1927) 200 Cal. 585; *Senate of State of Cal. v. Jones* (1999) 21 Cal.4th 1142; *Pratt v. Browne* (1902) 135 Cal. 649. ↑

39. *Williams*, 171 Cal. 658. ↑

40. *City of Cerritos*, 239 Cal.App.4th at 1052 (quoting *People v. Wallace* (2004) 120 Cal.App.4th 867, 873). ↑

41. Cal. Const. Art. IV, § 12(c)(3). ↑

42. *City of Cerritos*, 239 Cal.App.4th at 1050. ↑

43. *Id.* ↑

44. *Tomra Pac. v. Chiang* (2011) 199 Cal.App.4th 463, 483. ↑

45. *See, e.g. Prf'l Engr's in Cal. Gov't v. Brown* (2014) 229 Cal.App.4th 861; *Steinberg v. Chiang* (2014) 223 Cal.App.4th 338. ↑

46. Laurel Rosenhall, *Bitter or sweet, trailer bills let California lawmakers slip new policies into budget* (June 23, 2020) CalMatters. ↑

47. Cal. Legis. Serv. Ch. 17 (A.B. 103) § 17. ↑

48. *Id.* § 21. ↑

49. 2022 Cal. Legis. Serv. Ch. 569 (A.B. 156). ↑

50. *Id.* §§ 41, 43, 44, 45. ↑

51. *Id.* § 57. ↑

52. "Sen. Budget and Fiscal Review Committee" hearing on AB 156 Before Sen. Comm. On Budget and Fiscal Rev., Aug. 29, 2022 at 28:11. ↑

53. *Id.* at 28:45. ↑

54. *Harbor*, 43 Cal.3d. at 1100. ↑

55. 2026 Cal. Legis. Serv. Ch. 26 (A.B. 152). ↑

56. These are California, Arizona, Connecticut, Illinois, Maryland, Massachusetts, Minnesota, Pennsylvania, Rhode Island, Vermont, Nevada, New York, and Washington. ↑

57. Oklahoma Const., Art. V, § 57. ↑

58. *Bond v. Phelps* (1948) OK 76, 37-44. ↑

59. *Campbell v. White* (1993) OK 89, 856 ↑

60. *See Fent v. State ex re. Office of State Finance* (2008) OK 2, 25. *See also* Greg Eddington, *The Oklahoma Constitution's Single-Subject Rule* (2020) 44 Oklahoma City Univ. Law Review 265, 274-289. ↑

61. *See Pataki v. New York State Assembly* (2004) 4 NY3d 75, 82; *Constitutional Convention*, 1915, New York State Archives. ↑

62. *Id.* at 81. ↑

63. *Id.* ↑

64. N.Y. Const., Art. VII, § 2. ↑

65. N.Y. Const., Art. VII, § 6 ↑

66. N.Y. Const., Art. VII, § 4. ↑

67. *See Schuyler v. S. Mall Constructors*, 32 A.D.2d 454, 455 (1969). ↑

68. *See Center for Judicial Accountability, Inc. v. Cuomo* (2018), 167 A.D.3d 1406, 1411. ↑

69. *Id.* ↑

70. *Id.*; L.A. Times Archives, *Taming a Nightmare: Statewide Proposition 169 — Rx for the budget process*, (1993) The LA Times. ↑

71. Cal. Regulatory Law Reporter, Vol. 13 No. 4 (Fall 1993). ↑

72. 2025 Cal. Legis. Serv. Ch. 21 (A.B. 116); 2025 Cal. Legis. Serv. Ch. 7 (A.B. 118); 2025 Cal. Legis. Serv. Ch.8 (A.B. 121); 2025 Cal. Legis. Serv. Ch. 9 (A.B. 123); 2025 Cal. Legis. Serv. Ch. 22 (A.B. 130); 2025 Cal. Legis. Serv. Ch. 10 (A.B. 134); 2025 Cal. Legis. Serv. Ch. 11 (A.B. 136); 2025 Cal. Legis. Serv. Ch. 20 (A.B. 137); 2025 Cal. Legis. Serv. Ch. 12 (A.B. 143); 2025 Cal. Legis. Serv. Ch. 13 (S.B. 120); 2025 Cal. Legis. Serv. Ch. 14 (S.B. 124); 2025 Cal. Legis. Serv. Ch. 15 (S.B. 127); 2025 Cal. Legis. Serv. Ch. 16 (S.B. 128); 2025 Cal. Legis. Serv. Ch. 17 (S.B. 132); 2025 Cal. Legis. Serv. Ch. 18 (S.B. 141); 2025 Cal. Legis. Serv. Ch. 19 (S.B. 142). ↑

73. *City of Cerritos*, 239 Cal.App.4th at 1052 (quoting *People v. Wallace* (2004) 120 Cal.App.4th 867, 873). ↑

74. *Arizona Sch. Bds. Assn v. State* (2021) 250 Ariz. 187 (2022). ↑

75. Cal. Const. Art. IV, § 12. ↑

76. Jerod Macdonald-Evoy, *Arizona faces historic shutdown as House passes doomed continuation budget* (June 23, 2025) Arizona Mirror. ↑

77. Ariz. Const. Art. IV, Part 1, §1. ↑

78. *See Arizona Law: Arizona Legislature* (2025) Ariz. State Univ. College of Law Library. ↑

79. Ariz. Const. Art. IV, Part 1, § 3. ↑