

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



ITEM: 3.5
(ID # 30513)

MEETING DATE:
Tuesday, June 09, 2026

FROM : EXECUTIVE OFFICE

SUBJECT: EXECUTIVE OFFICE: Approval of the Response to the 2025-2026 Grand Jury Report 'Uncapped Influence: Campaign Contributions and Public Trust in Riverside County'

RECOMMENDED MOTION: That the Board of Supervisors:

1. Approve, with or without modification, the attached response to the 2025-26 Grand Jury Report: Uncapped Influence: Campaign Contributions and Public Trust in Riverside County; and
2. Direct the Clerk of the Board to immediately forward the Board's finalized responses to the Grand Jury, the Presiding Judge, and the County Clerk-Recorder.

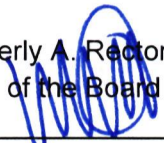
ACTION:Policy


Jeff Van Wagenen, County Executive Officer 6/4/2026

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Medina, seconded by Supervisor Perez and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Medina, Spiegel, Washington, Perez, and Gutierrez
Nays: None
Absent: None
Date: June 9, 2026
xc: EO, Grand Jury, Presiding Judge, Recorder

Kimberly A. Rector
Clerk of the Board
By: 
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	N/A	N/A	N/A	N/A
NET COUNTY COST	N/A	N/A	N/A	N/A
SOURCE OF FUNDS: N/A			Budget Adjustment: No	
			For Fiscal Year: 25/26	

C.E.O. RECOMMENDATION: Approve.

BACKGROUND:

Summary

On March 2, 2026, the Riverside County Grand Jury released the Grand Jury Report: Uncapped Influence: Campaign Contributions and Public Trust in Riverside County. Penal Code Section 933(c) required the Board of Supervisors to comment on the Grand Jury’s recommendations pertaining to matters under the Board’s control. In addition, responses must be provided to the Presiding Judge of the Superior Court within 90 days of receipt of the report.

ATTACHMENTS:

ATTACHMENT A. 2025-26 Grand Jury Report: Uncapped Influence: Campaign Contributions and Public Trust in Riverside County.

ATTACHMENT B. Grand Jury Response to ‘Uncapped Influence’.

Minh C. Tran
 Minh C. Tran, County Counsel 6/4/2026



RIVERSIDE COUNTY GRAND JURY

(951) 955-8990 OFFICE • (951) 955-8989 FAX

March 2, 2026

Kimberly Rector – Clerk of the Board
4080 Lemon Street, 1st Floor
Riverside, CA. 92501

Subject: 2025-2026 Grand Jury Report: Uncapped Influence: Campaign Contributions and Public Trust in Riverside County

Dear Board of Supervisors:

The Grand Jury has filed the above- referenced report and requires a response from your office. Please note that Penal Code section 933 et seq. requires the governing body of the affected public agency to submit a written response to the following agencies within ninety (90) days:

Jacqueline Jackson, Presiding Judge
Superior Court of California, County of Riverside
4050 Main Street
Riverside, CA 92501

Riverside County Grand Jury
Post Office Box 829
Riverside, CA 92502

Riverside County Clerk-Recorder
2720 Gateway Drive
Riverside, CA 92507

Further, it specifies that this report be kept **confidential for a minimum of two working days** prior to public release. The contents of this report will be made public after the close of business **March 5, 2026**.

Please ensure that your response reflects and complies with the requirements of Title II of the Americans with Disabilities Act, and that it is provided in a format that is accessible to and fully compatible with commonly used accessibility software.

Sincerely,

Christina N. Wasson, Foreperson
2025-2026 Riverside County Civil Grand Jury

P.O. Box 829 – Riverside, California 92502



2025-2026

Riverside County

Civil Grand Jury

Uncapped Influence:

Campaign Contributions and Public Trust
in Riverside County

January 29, 2026

SUMMARY

The 2025–2026 Riverside County Civil Grand Jury (the Grand Jury) investigated the influence of large campaign contributions to the county's elected officials, particularly focusing on the effects of Riverside County Ordinance 963 (Ordinance 963) and its exception clause.

The report concludes that Ordinance 963 (see appendix for website to access full text), while establishing a campaign contribution limit, contains an exception that allows for unlimited contributions from independent expenditures (*e.g.*, political action committees (PACs) and unions). This undermines the purpose of reducing the influence of large donors and maintaining public trust. The Grand Jury found evidence of significant campaign contributions from a single contributor after the adoption of the ordinance. While certain independent expenditures are allowed in the Supreme Court ruling *Citizens United v. Federal Election Commission*, further transparency should be required so that voters can make informed decisions about who is funding political ads and potentially influencing elections. This transparency would also create accountability for any elected official receiving large portions of funding from a single contributor.

This report addresses the unlimited contribution loophole that exists in Ordinance 963. The Grand Jury recommends a requirement for Riverside County Board of Supervisors (the Board) to disclose large campaign contributions when voting on items that directly affect those contributors, and recommends removing the exception that allows the loophole.

Discovery of this loophole emerged after public outcry of possible influence during a Board meeting on July 29, 2025. During this meeting, a procedural error and a supervisor's early departure possibly led to an item of significant public interest failing to receive a second motion and thus dying. The Grand Jury recommends the adoption of policies to guarantee that attending the Board's general meeting is a priority. The Grand Jury also noted an appearance of undue influence since the item would have directly affected the single largest contributor to some of the supervisors' campaigns.

SUMMARY OF FINDINGS

The Riverside County Civil Grand Jury made six key findings:

1. **Increased Contribution Limit:** The Board adopted Ordinance 963 in 2020, which raised the individual campaign contribution limit from \$3,000 set by California Assembly Bill 571 (AB 571) to \$20,000 (adjusted by 3% biennially).
2. **Nullifying Exemption:** Ordinance 963 includes an exception clause (Section 4, Heading F) that exempts all candidates running for the same office from the contribution limits if any candidate in that race benefits from an independent expenditure of more than \$20,000. This exception essentially nullifies the limit.
3. **Undermining Purpose:** This exception undermines the stated purpose of both the state law, AB 571, and Ordinance 963 to prevent unlimited contributions.
4. **Appearance of Influence:** Due to the large campaign contributions from a single entity with a direct interest in the outcome of an agenda item of significant public interest, there was an appearance of undue influence on the Board when the item was addressed.
5. **Meeting Priority:** A supervisor's need to leave the general meeting early to attend another meeting reduced the number of possible votes and contributed to a subsequent motion failing to be seconded.
6. **Procedural Violation:** The Board's chairperson moved an agenda item of significant public interest to the end of the meeting without the required Board motion, which was against Board policy. Afterward, twenty-two speakers who were slated to speak on the agenda item did not do so.

SUMMARY OF RECOMMENDATIONS

The Riverside County Civil Grand Jury recommends the Board take the following actions:

1. **Amend Ordinance 963 (R1 & R2):** Remove the exception outlined in section 4, heading f (section 4(f)).
2. **Prioritize Meetings (R3):** Adopt a policy requiring the Board's general meeting to be a priority for scheduling, with any foreseeable conflicts required to be eliminated.

3. **Contribution Limit (R4):** To the extent the Board believes it is reasonable to eliminate the exception in section 4(f) but maintain the \$20,000 limit in section 4, heading a (section 4(a)) of Ordinance 963 rather than the state’s limits, which is currently \$5,900, the Board should explain its rationale to the public.
4. **Disclose Large Donations (R5):** In the event the Board does not remove section 4(f) from Ordinance 963: Adopt a policy requiring supervisors to disclose the contributor and the precise amount at the time of a vote on an item, where that supervisor has received more than \$20,000 in cumulative campaign contributions from that person (as defined in the ordinance) during their last campaign cycle, and where the contributor (person) may have a vested interest in the item.

BACKGROUND

Since the formation of Riverside County, campaign finance and contributions have been addressed many times. Prior to 1974, there were rules governing campaign finance and lobbying, but were often considered insufficient and rarely enforced, which spurred public support for the California Political Reform Act of 1974 (the PRA) in the wake of the Watergate scandal. The PRA was a landmark measure regarding political and governmental conduct. The Fair Political Practices Commission (FPPC) was created under the PRA and is primarily responsible for “the impartial, effective administration and implementation” of the PRA and is authorized to “adopt, amend and rescind rules and regulations to carry out the purposes and provisions of the PRA.”¹ The PRA, enacted by voters, included these provisions:

- **Mandatory Disclosure:** Required all receipts and expenditures in election campaigns to be fully and truthfully disclosed.
- **Limit on Anonymous Contributions:** Prohibited anonymous contributions of \$100 or more.
- **Creation of the FPPC:** Established the FPPC to enforce the PRA.

¹ [Cal. Gov’t Code §§ 83100, 83112](#), accessed November 14, 2025

- **Lobbyist Restrictions:** Imposed a \$10 gift limit on lobbyists and, for a time, prohibited lobbyists from making contributions (this was later modified).²

On October 8, 2019, AB 571 was approved by the governor and enacted into law. The bill prohibits a person from contributing more than \$3,000 to a candidate for elective county or city office and prohibits a candidate from accepting a contribution totaling more than \$3,000 from a person. AB 571 allows counties and cities to set their own campaign contributions.³ The county did not have campaign contribution limits prior to the passage of AB 571. On November 17, 2020, the Board passed Ordinance 963 to adopt campaign limits for county elective offices in response to AB 571. Section 4 of Ordinance 963 states in part as follows:

a. No person shall make to a candidate for County Elective Office, or to a controlled committee of that candidate, a campaign contribution totaling more than twenty thousand dollars (\$20,000) per election.

b. No candidate for County Elective Office, nor a controlled committee of that candidate, shall accept from a person a campaign contribution totaling more than twenty thousand dollars (\$20,000) per election.

f. In the event that a candidate for County Elective Office contributes more than twenty thousand dollars (\$20,000) of the candidate's personal funds to the candidate's own campaign, is the beneficiary of an independent expenditure of more than twenty thousand dollars (\$20,000), or transfers campaign funds totaling more than twenty thousand dollars (\$20,000) from one controlled committee or campaign fund account to another controlled committee or campaign fund account, all other candidates running in the election for that same County Elective Office are exempted from the campaign contribution limits of this section 4 for that election as well. ⁴

² sos.ca.gov/campaign-lobbying/about-the-political-reform-division- accessed October 22, 2025.

³ legiscan.com/CA/text/AB571/id/2056456-accessed September 18, 2025.

⁴ rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-963.pdf- accessed September 18, 2025.

METHODOLOGY

The Grand Jury conducted interviews, reviewed documents, attended public meetings, viewed websites, and communicated with individuals and organizations.

Interviews:

- Members of the Riverside County Board of Supervisors
- Riverside County Clerk of the Board (Clerk of the Board)
- Riverside County Assistant Clerk of the Board (Assistant Clerk of the Board)
- A member of the community

Document Reviews:

- Board of Supervisors policy and procedures
- Supreme Court Ruling, *Citizens United vs. Federal Election Commission*, 2010, 558 U.S. 310
- California Assembly Bill 571
- Riverside County Ordinance 963
- California Secretary of State- Cal-Access
- Riverside County Registrar of Voters- California Form 460

Communications

- Clerk of the Board
- Assistant Clerk of the Board
- County Counsel

Visits

- Board of Supervisors Chambers

Videos

- Board of Supervisors chambers security camera footage

- Several past Board of Supervisor meetings

Websites

- fec.gov/resources/legal-resources/litigation/cu_sc08_opinion.pdf
- fppc.ca.gov/
- public.netfile.com/CaliforniaForm460
- legiscan.com/CA/text/AB571
- rivcocob.org
- scholarship.law.duke.edu
- congress.gov

DISCUSSION

Campaign Contributions

Riverside County has eleven elected officials. Each official is elected to a four-year term. Elections are held on cycles beginning in 2022 (2022, 2026, 2030, etc.), with the exception of Board of Supervisors Districts One and Three, which follow four-year cycles beginning in 2020 (2020, 2024, 2028, etc.).⁵ The list of elected officials is as follows:

- Board of Supervisors
- District Attorney
- Sheriff-Coroner-Public Administrator
- Assessor-County Clerk-Recorder
- Auditor-Controller

⁵ ballotpedia.org/Government_of_Riverside_County,_California-Accessed September 18, 2025.

- Treasurer-Tax Collector
- Superintendent of Schools

AB 571 has a stated purpose of “imposing limitations on campaign contributions for cities and counties that have not adopted any,” as well as “prevent allowing unlimited contributions from a single contributor.” It also allows counties and cities to limit their own campaign contributions via ordinance or resolution. Additionally, it limits city and county officials from accepting “more than \$3,000 [per person] per election” if the counties or cities do not set their own limits. AB 571 allows the state to adjust the amount of contributions year over year, increasing the limit to \$5,900 per person in the 2025–2026 fiscal year.⁶

In response to AB 571, two Riverside County Board of Supervisors proposed Ordinance 963 on November 10, 2020. The Board adopted Ordinance 963 on November 17, 2020 with a 5-0 vote. Ordinance 963 states, “The purpose of this ordinance is to reduce the influence of large contributions, or the appearance of influence of large contributions, to ensure that individuals and interest groups continue to have a fair and equal opportunity to participate in electing candidates for County Elective Office, and to maintain public trust and confidence in governmental institutions and the electoral process.”⁷

Ordinance 963 defines a “Person” as “an individual, proprietorship, firm, partnership, joint venture, syndicate, business trust, company, corporation, limited liability company, association, committee, and any other organization or group of persons acting in concert.” Ordinance 963 sets limits on contributions to \$20,000 and allows increasing contributions by 3% on January 1 of every odd-numbered year. It sets an exception to campaign contributions where “the beneficiary of an independent expenditure of more than twenty thousand dollars (\$20,000)” will allow “all

⁶ legiscan.com/CA/text/AB571/id/2056456-accessed September 18, 2025.

⁷ rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-963.pdf-accessed September 18, 2025.

other candidates running in the election for that same County Elective Office to be exempted from the campaign contribution limits of this section 4 for that election as well.”⁸

Undue influence from campaign contributions may occur when large donors gain disproportionate access to and influence over elected officials, leading to policies that favor private interests over the public good.⁹ Large campaign contributions create the perception of a “pay-to-play” system that erodes public trust and gives donors special access to policymakers, allowing them to help shape legislation behind closed doors. This may result in policies that benefit specific industries or donors, rather than the general population.¹⁰

In 2010, a landmark Supreme Court case, *Citizens United v. Federal Election Commission*, changed the landscape of campaign finance law in the United States. The 5–4 decision held that corporations and unions have the same First Amendment rights as individuals and, therefore, the government cannot restrict their independent political spending. The ruling opened the door to an unprecedented surge in political spending from outside groups.¹¹

In 2010, the United States Supreme Court in the majority decision of *Citizens United vs. the Federal Election Commission* noted:

“...that independent expenditures do not lead to, or create the appearance of, quid pro quo corruption. If elected officials succumb to improper influences from independent expenditures; if they surrender their best judgment; and if they put expediency before principle, then surely there is cause for concern. We must give weight to attempts by Congress to seek to dispel either the appearance or the reality of these influences.”¹²

The Grand Jury researched the contributions made to county elected officials. The Grand Jury looked for individual persons or entities contributing to campaigns since the adoption of Ordinance 963. The Grand Jury used the Riverside County Registrar of Voters (ROV) and the California Secretary of State (SOS) websites to track the contributions reported on candidates’

⁸ rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-963.pdf accessed September 18, 2025.

⁹ scholarship.law.duke.edu/djclpp/vol9/iss2/5/ -accessed September 19, 2025.

¹⁰ congress.gov/crs-product/R44447 -accessed September 19, 2025.

¹¹ fec.gov/legal-resources/court-cases/citizens-united-v-fec/ -accessed September 19, 2025.

¹² fec.gov/resources/legal-resources/litigation/cu_sc08_opinion.pdf - accessed October 3, 2025.

California Form 460 statements and the SOS Cal-Access website. The Grand Jury was specifically interested in contributions made to some County elected officials by a single contributor.

From the information gathered, the Grand Jury noticed no discernable difference in campaign contributions prior to, and post adoption of Ordinance 963. As seen in the Appendix, when tracking the contributions made to these elected officials from 2018 to 2028 the total contributions to a candidate roughly match that of the campaign prior to and post adoption of Ordinance 963. This implies that the stated purpose in the ordinance has gone mostly unresolved. Please note that all of the statistics for fiscal data were gathered from the required Form 460, which are all self-declared. This does not factor in money given to an independent expenditure that is not disclosed or transferred from another account; money that is often referred to as “dark money.”¹³ From these numbers, the sheer amount of money in our local politics is alarming and can create a barrier to entry for the individuals not backed by independent contributors or SuperPACs (provides indirect contributions). While it is understood that certain campaign contribution cannot be limited, the public can and should still demand transparency. In interviews with some Riverside County elected officials, it was stated that it can cost well over one million dollars to run a local campaign. Direct contributions by unions and PACs help candidates meet the exorbitant costs of a campaign. When analyzing the finances of one Riverside County elected official, 24.7% of their contributions were made up by a single contributor. For this same candidate 70.7% of total contributions came from PAC’s, unions, and business expenditures. In addition, of the elected officials interviewed, all of them stated that they accepted more than \$20,000 from PACs or unions. With many of the elected officials receiving most of their contributions from these large donors, it becomes foreseeable that the officials may vote or propose legislation that is favorable for a PAC or union, but one that is not desired by their constituents.¹⁴ This can be done through an implied pressure from the money received or even direct suggestions that contributions may be pulled from their next election if the candidate doesn’t “play ball.” Local officials may be concerned that decisions that are

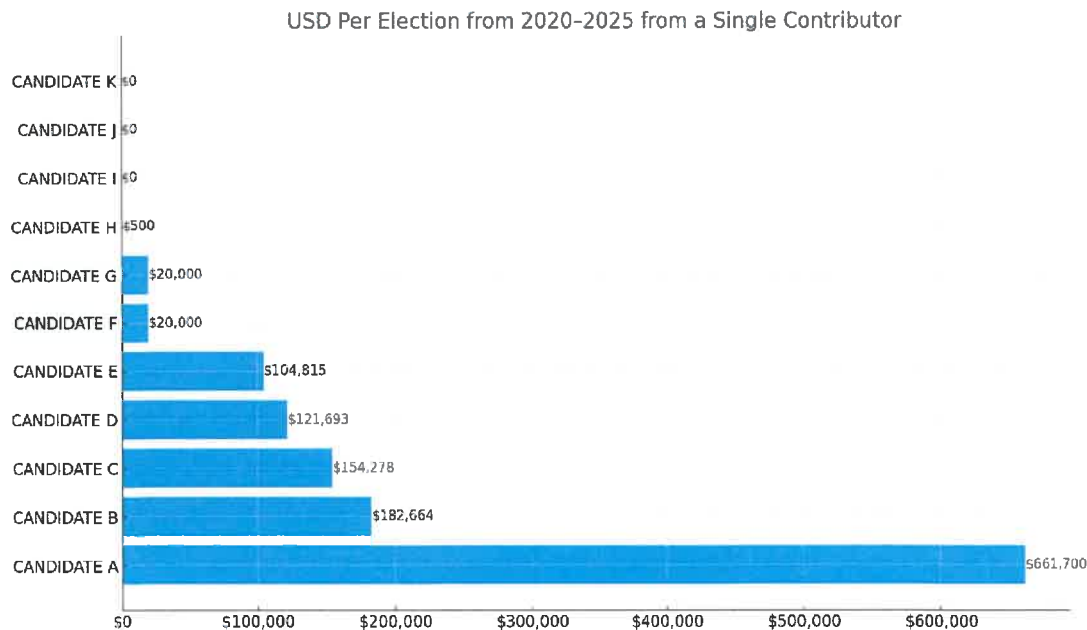
¹³[law.columbia.edu/news/archive/what-dark-money-5-questions-answered](https://www.law.columbia.edu/news/archive/what-dark-money-5-questions-answered) -accessed October 14, 2025.

¹⁴ [fec.gov/resources/legal-resources/litigation/cu_sc08_opinion.pdf](https://www.fec.gov/resources/legal-resources/litigation/cu_sc08_opinion.pdf) -accessed October 3,2025.

unfavorable to large donors will mean that they will not receive enough donations to prevail in their next election. When asked about the appearance of the donations they received from unions and PACs, some of these elected officials expressed apathy.

See the table below (figure 1) for contributions made by one single contributor to county elected officials since the adoption of Ordinance 963.

Figure 1



See appendix for contributions and expenditures for five candidates from 2018 to 2028.

APPEARANCE OF INFLUENCE

On July 29, 2025, a Board meeting included an agenda item of significant public interest. It was noted during the meeting that eighty-two speakers had arrived or were on the phone to speak on this item, which was confirmed via counted speaker cards, and visually confirmed on security camera footage of the room.¹⁵ Approximately one hour into the meeting at 10:30 a.m., the chairman solicited advice from county counsel on whether the chairperson was allowed to move an item on the agenda. County counsel responded that it was the prerogative of the chair to move the item. This directly contradicts Board policy A-2(10) which states, “The Board may, on

¹⁵ rivcocob.org/2025-agendas-and-proceedings-accessed September 25, 2025.

passage of a motion, take any matters set for hearing out of order as listed on the printed agenda.”¹⁶ While the matter may be moved on the agenda, it requires the prerequisite steps of passing a motion as well as being a Board decision and not the chairman’s prerogative.

The result of this decision caused twenty-two speakers who were slated to speak to instead leave or disconnect from the meeting altogether, reducing the voice of the constituents by 26.8%.¹⁷ At approximately 12:15 p.m., one Board member excused himself to attend another meeting for it to have a quorum. The departure of this supervisor resulted in one less possible vote to carry a motion or vote on its approval. Around twenty minutes after the departure of this supervisor, the discussion of the item began. At 2:45 p.m., a motion for the item was put forth and a request for a second was made which it failed to receive. The item then died without a second motion, after several statements of “needing more time” were made by the supervisors.¹⁸ In several interviews, following the events, it was described by multiple county officials that a motion not receiving a second was “unusual.” Upon analyses of the last five years of Board meetings, the Grand Jury failed to find any instances of a motion not receiving a second.¹⁹ A decision on the matter would have had a direct and measurable impact on a labor union that made large campaign contributions to several members of the Board. Therefore, it appears that these large campaign contributions were, at the very least, successful in delaying a decision on this matter.

Since Ordinance 963 has been in effect, some County elected officials have received campaign contributions from one contributor in excess of \$20,000. This single contributor is the same contributor shown in figure 1 who had donated directly to the elected officials’ campaigns.²⁰ This agenda item would have a direct measurable impact on this contributor. Therefore, the contribution is antithetical to the goals of Ordinance 963 and AB 571. Having that entity contribute to their campaigns in excess can give an appearance of undue influence when making decisions on items that can have a direct effect on that entity. Based upon facts regarding

¹⁶ rivcocob.org/2025-agendas-and-proceedings-accessed September 25, 2025.

¹⁷ rivcocob.org/2025-agendas-and-proceedings-accessed September 25, 2025.

¹⁸ riversidecountyca.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=3193&Format=Agenda-accessed September 25, 2025.

¹⁹ rivcocob.org/2025-agendas-and-proceedings-accessed September 25, 2025.

²⁰ public.netfile.com/pub2/?aid=CTRIV-accessed September 25, 2025.

campaign contributions of a single contributor exceeding limits set in Ordinance 963, exempting the unlimited campaign contributions, and procedure violations during the July 29, 2025 meeting, there is a perception of influence.

During multiple interviews with county elected officials, they expressed the belief that the 2010 Supreme Court decision, *Citizens United vs. the FEC*, gives them the ability to receive as much in campaign contributions as they can get from any single contributor. In its appearance, this assumption fails to distinguish between direct and indirect contributions, as well as collaboration between the candidate and the contributor. Indeed, this allows for unlimited contributions from PACs and independent expenditures in the case of indirect contributions and no collaboration from the candidate, but does not speak to direct contributions. The small contributor group that provided the funds to these candidates did so by giving funds to their campaign, and is marked monetary under the Form 460. It appears to be a direct contribution and not an indirect one that is given freedom by the Supreme Court case. If this is true, exceeding the limits set in Ordinance 963 could not only appear to influence candidates, but also become antithetical to its stated purpose. To be specific, one of the stated purposes of Ordinance 963 is to “reduce the influence of large contributions, or the appearance of influence of large contributions” on local election campaigns. As revealed by the Grand Jury’s investigation, the sheer size of the donations by single contributors speak for themselves. These contributions create a barrier to entry for citizens who might consider running for local office but are not connected to large money interests. The unlimited contributions by single contributors as permitted by section 4(f) of Ordinance 963 are contrary to the stated purposes of the ordinance and can be harmful to voters.²¹

CONCLUSION

Based upon the lack of enforceable campaign contribution limits, acceptance of contributions from single contributors that make up large portions of an elected officials’ campaign, and violations of policy during Board meetings, it is plausible that an elected official could be

²¹ rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-963.pdf-accessed September 18, 2025.

influenced in a way that does not represent the majority of their constituents. A solution to this would be the adoption of explicit campaign funding limits by removing section 4(f) from Ordinance 963. This would level the playing field between large and individual donors. In addition, the county should also be transparent and provide checks and balances to remedy this perception. In order to establish this, the county should adopt amendments to Ordinance 963 which requires supervisors to announce publicly how much they received from a vested interest before voting on an item in a public forum. This allows the public to better understand the influence organizations may have on their elected officials. Secondly, disclosure policies and procedures should be adopted that hold elected officials accountable to the public for the actions they take or do not take while in office, ensuring the continued standard of care and discretion for all items held to a vote. Finally, the ability for elected officials to propose and pass policy relating to their own campaign contributions is inherently self-serving. In order to resolve this, a vote of the people should be required to finalize any financial decision that directly affects the elected officials campaign finance. Establishment of these principles will increase public trust and provide another check and balance to protect Riverside County from outside businesses, committees, or any other entity that would seek their own personal gain over the benefit of the people.

FINDINGS

- F1. The Board proposed and adopted Ordinance 963 which significantly increases their campaign contribution limit from the \$3,000 (set by AB 571) to \$20,000 (set by Ordinance 963) adjusted by 3% per person every odd-numbered year per campaign.
- F2. The Board created an exemption to the limit set in Ordinance 963 by adding section 4(f), which states “the beneficiary of an independent expenditure of more than twenty thousand dollars (\$20,000)” will allow “all other candidates running in the election for that same county elective office to be exempted from the campaign contribution limits of this section 4(f) for that election as well.” This nullifies the limit outlined in sections 4(a) and (b), which set the limits for campaign contributions.

- F3. The exception created in section 4(f) of Ordinance 963 undermines the stated purposes of AB 571 and Ordinance 963 by allowing unlimited contributions which this report tries to resolve.
- F4. The chairperson moved an agenda item to the end of the agenda without a motion. This is contrary to Board policy and procedure A-2(10). Afterward twenty-two people, who wanted to speak on the item, did not do so.
- F5. The participation by one of the supervisors in a conflicting, external meeting during the Board's general meeting removed the possibility of that supervisor to make, second, or vote on a motion.
- F6. Given evidence of direct funding from a single contributor, who had a direct interest in the results of a controversial item, there was an appearance of influence on the Board when the item was addressed.

RECOMMENDATIONS

- R1. The Grand Jury recommends that the Board amend Ordinance 963 to eliminate the exception in section 4(f) that allows unlimited campaign contributions from single contributors.
Based on Findings: F1-F3
Financial Impact: Minimal
- R2. The Grand Jury recommends that the Board either impose reasonable, mandatory limits on campaign contributions by single contributors or accept the default limits proscribed by the PRA and FPPC regulations.
Based on Findings: F1-F3
Financial Impact: Minimal
- R3. The Grand Jury recommends that the Board amend their policy A-2(7) from the statement "Robert's Rule of Order may be used as a general guide for the conduct of the Board's meetings" to "Robert's Rule of Order shall be used for the conduct of the meeting." This holds supervisors to account for actions during the general meeting and promotes

consistency for motions proposed and passed.

Based on Findings: F4-F5

Financial Impact: Minimal

- R4. The Grand Jury recommends that the Board adopt a policy that makes the Board's general meeting a priority for scheduling and requires supervisors to defer any foreseeable conflicts.

Based on Findings: F5

Financial Impact: Minimal

- R5. The Grand Jury recommends that to the extent the Board believes it is reasonable to eliminate the exception in section 4(f) but maintain the \$20,000 limit in section 4(a) of Ordinance 963 rather than the state's limit, which is currently \$5,900, the Board should explain its rationale to the voters.

- R6. The Grand Jury recommends that in the event the Board does not remove section (4f) from Ordinance 963, that they adopt a policy requiring supervisors to disclose the contributor and the precise amount at the time of a vote on an item, where that supervisor has received more than \$20,000 in cumulative campaign contributions from that person (as defined in the ordinance) since their last campaign cycle, and where the contributor (person) may have a vested interest in the item.

Based on Findings: F1-F3, F6

Financial Impact: Minimal

- R7. The Grand Jury recommends that the Board add a section to Ordinance 963 requiring a vote of the people regarding any campaign limit changes and campaign contribution changes for any elected county official. This shall be administered on the same ballot for any primary or general election as the vote that is held for the elected officials.

Based on Findings: F6

Financial Impact: Minimal

REQUIRED RESPONSES

According to California Penal Code §933, governing bodies must respond to Grand Jury findings and recommendations within 90 days while an elected county officer must respond to Grand Jury findings and recommendations within 60 days. California Penal Code §933.05 outlines the limits within which governing bodies are allowable to respond.

Who	Findings	Recommendations
Riverside Count Board of Superviss	F1-F6	R1-R7

INVITED RESPONSES

Who	Findings	Recommendations
County Cel	F1-F6	R1, R2, R5

BIBLIOGRAPHY

2025 Agendas and Proceedings | Riverside County Clerk of the Board, rivcocob.org/2025-agendas-and-proceedings. Accessed September 25, 2025.

Ca AB571 | 2019-2020 | Regular Session | Legiscan, legiscan.com/CA/bill/AB571/2019. Accessed September 18, 2025.

“Citizens United v. FEC.” *FEC.Gov*, www.fec.gov/legal-resources/court-cases/citizens-united-v-fec/. Accessed October 3, 2025.

“Duke Law Scholarship Repository.” *Site*, scholarship.law.duke.edu/. Accessed September 19, 2025.

FEC, www.fec.gov/resources/legal-resources/litigation/cu_sc08_opinion.pdf. Accessed September 19, 2025.

“Board of Supervisor Campaign Contributions.” *County of Riverside - Electronic Filing System*, www.netfile.com/agency/ctriv/. Accessed 20 Oct. 2025.

“Government of Riverside County, California.” *Ballotpedia*, ballotpedia.org/Government_of_Riverside_County,_California. Accessed September 18, 2025.

“Ordinance 963.” *Riverside County Clerk of the Board*, rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-963.pdf. Accessed September 18, 2025.

“*Board of Supervisor Policy*” *Rivcocob*, rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2021-04-745.4.pdf. Accessed September 18, 2025.

Riverside County History | County of Riverside, CA, rivco.org/riverside-county-history. Accessed September 18, 2025.

“Video Archive.” *Video Archive - Riverside County, California*, riversidecountyca.iqm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2299&Format=Agenda. Accessed September 25, 2025.

“What Is Dark Money? 5 Questions Answered.” *Columbia Law School*, www.law.columbia.edu/news/archive/what-dark-money-5-questions-answered. Accessed October 14, 2025.

APPENDIX

Candidate contributions and expenditures for 2018:

Candidate Contribution	Expenditure
A \$591,768.57	\$623,826.57
B \$1,018,001.50	\$1,018,704.00
C \$841,189.99	\$741,087.14

Candidate contributions and expenditures for 2020:

Candidate Contribution	Expenditure
D \$477,859.49	\$512,167.10
E \$477,519.25	\$568,458.52

Candidate contributions and expenditures for 2022:

Candidate Contribution	Expenditure
A \$615,217.41	\$213,755.74
B \$748,866.60	\$449,362.60
C \$1,174,609.35	\$1,008,377.58

Candidate contributions and expenditures for 2024:

Candidate Contribution	Expenditure
D \$738,144.20	\$697,476.04
E \$425,900.59	\$441,848.43

Candidate contributions and expenditures for 2026:

Candidate Contribution		Expenditure
A	\$344,221.38	\$213,490.23
B	\$365,593.00	\$461,273.09
C	\$196,596.00	\$29,036.21

Candidate contributions and expenditures for 2028:

Candidate Contribution		Expenditure
D	\$1,000.00	\$2,065.50
E	\$77,447.89	\$44,190.61

Refer to <https://rivcocob.org/sites/g/files/aldnop311/files/2025-10/963.1.pdf> for full text of Ordinance NO. 963.

Report Issued Date: 3-2-2026
 Report Public Date: 3-5-2026
 Response Due Date: 6-5-2026

2025-26 Grand Jury Report
Uncapped Influence: Campaign Contributions and Public Trust in
Riverside County
June 9, 2026
Board of Supervisors

The Board appreciates the Grand Jury's attention to public trust, campaign finance transparency, and orderly public meeting procedures. The responses below have been prepared by the Executive Office and County Counsel on behalf of the Board of Supervisors to address the specific findings and recommendations directed to the Board. The disagreement with certain findings and recommendations does not diminish the Board's commitment to open public meetings, compliance with campaign finance disclosure laws, and transparent decision-making.

GRAND JURY FINDINGS:

Grand Jury Finding #1:

The Board proposed and adopted Ordinance 963 which significantly increases their campaign contribution limit from the \$3,000 (set by AB 571) to \$20,000 (set by Ordinance 963) adjusted by 3% per person [SIC] every odd-numbered year per campaign.

Response to Grand Jury Finding #1:

Respondent disagrees partially with the finding.

The County agrees that Ordinance 963 was passed on November 17, 2020 and became effective January 1, 2021. The Board also notes that section 4(g) provides that the contribution limits shall be increased by 3% on January 1 of every odd-numbered year.

The County respectfully disagrees, however, with the characterization that Riverside County's contribution limit increased from \$3,000 under AB 571 to \$20,000 under Ordinance 963. AB 571 expressly permitted a county or city to impose a limit on contributions which prevails over the limit established in AB 571, as long as the local contribution limits are in effect by January 1, 2021. Riverside County did not have local contribution limits before Ordinance 963. Ordinance 963 therefore established the County's first local campaign contribution limits rather than increasing a limit that was already in effect.

Further, as was stated in the Board actions at the time that Ordinance 963 was initiated (Item 3.3, August 4, 2020) "Limiting direct contributions to \$4,700 per candidate would almost certainly drive more of the large direct contributions to be spent as independent expenditures instead, reducing the accountability of the campaigns, and taking away control and responsibility from the candidate".

Grand Jury Finding #2:

The Board created an exemption to the limit set in Ordinance 963 by adding section 4(f), which states “the beneficiary of an independent expenditure of more than twenty thousand dollars (\$20,000)” will allow “all other candidates running in the election for that same county elective office to be exempted from the campaign contribution limits of this section 4(f) for that election as well.” This nullifies the limit outlined in sections 4(a) and (b), which set the limits for campaign contributions.

Response to Grand Jury Finding #2:

Respondent disagrees partially with the finding.

The County agrees that Ordinance 963 includes an exemption from the contribution limits in specified circumstances. However, the County respectfully disagrees that the exemption nullifies the contribution limits. The exemption applies only in limited circumstances identified in section 4(f) including where a candidate benefits from an independent expenditure exceeding the threshold set forth in the ordinance or transfers campaign funds above that threshold.

The provision was included as part of the ordinance’s overall structure to address circumstances in which the financial conditions of a race materially change because of candidate self-funding, large transfers, or independent expenditures that are not regulated in the same manner as direct candidate contributions. The purpose was not to eliminate contribution limits in all cases, but to preserve candidate accountability and transparency under those circumstances.

Grand Jury Finding #3:

The exception created in section 4(f) of Ordinance 963 undermines the stated purpose of AB 571 and Ordinance 963 by allowing unlimited contributions which this report tries to resolve.

Response to Grand Jury Finding #3:

Respondent disagrees wholly with finding.

The purpose of AB 571 was to establish a default contribution limit only for jurisdictions that had not adopted local limits and expressly preserved local authority to adopt different local limits. Riverside County exercised that local authority when it adopted Ordinance 963.

Section 4(f) does not undermine the purpose of AB 571. Rather, it reflects a local policy judgment that, in limited triggering circumstances, the competing interests of candidate

accountability, transparency, and the practical effect of independent expenditures, candidate self-funding, or large intra-candidate transfers should also be addressed.

The Board included that provision to avoid placing other candidates in the same race at a significant disadvantage once the financial landscape of the election has materially changed. This was adopted as part of a comprehensive local ordinance and does not conflict with the basic framework described in the FPPC's AB 571 guidance.

Grand Jury Finding #4:

The chairperson moved an agenda item to the end of the agenda without a motion. This is contrary to Board policy and procedure A-2(10). Afterward twenty-two people, who wanted to speak on the item, did not do so.

Response to Grand Jury Finding #4:

Respondent disagrees wholly with finding.

The County respectfully disagrees that the Chair's action violated Board Policy A-2(10). Policy A-2(10) provides that the Board may, on passage of a motion, take matters set for hearing out of order as listed on the printed agenda. The agenda item at issue was not a time-set public hearing or other matter set for hearing within the meaning of Policy A-2(10); therefore, the motion requirement in Policy A-2(10) did not apply to the Chair's management of the order of business for that item.

It has been the County's long-standing practice to allow the Board Chair discretion to manage the order and flow of agenda items, subject to applicable law, Board policy, and guidance from County Counsel. That discretion is used to conduct the public's business efficiently, including where an item is expected to require substantial public comment or extended Board discussion.

The County also does not agree that the later placement of the item denied the public an opportunity to be heard. Members of the public who wished to speak were afforded the opportunity to do so when the item was taken up, and the Board received substantial public comment on the item. The County cannot determine the reason that those who submitted a speaker card ultimately decided not to speak.

Grand Jury Finding #5:

The participation by one of the supervisors in a conflicting, external meeting during the Board's general meeting removed the possibility of the supervisor to make, second, or vote on a motion.

Response to Grand Jury Finding #5:

Respondent agrees with finding.

The County acknowledges that a supervisor's early departure from the July 29, 2025 meeting to attend another legislative body's meeting made that supervisor unavailable to make, second or vote on motions for the balance of the meeting.

The County's agreement with this finding is limited to the effect of the supervisor's absence on that supervisor's ability to participate after departure. Board members represent the County on multiple regional, state, and local boards, commissions, and other public bodies. Although Board meetings are a scheduling priority, conflicts occasionally arise and may affect attendance.

Grand Jury Finding #6:

Given evidence of direct funding from a single contributor, who had a direct interest in the results of a controversial item, there was an appearance of influence on the Board when the item was addressed.

Response to Grand Jury Finding #6:

Respondent disagrees wholly with finding.

The County recognizes that disclosed campaign contributions may raise public perception questions in controversial matters. However, the County respectfully disagrees that the facts identified in the report establish an appearance that the Board's handling of the item was influenced by campaign contributions. Campaign contributions are subject to public disclosure under the Political Reform Act and related filing requirements. A disclosed campaign contribution does not establish that a Board action was influenced by that contribution or that a Board member was legally disqualified from participating in a matter.

The Grand Jury report relies on an appearance-based conclusion and does not identify evidence establishing that the outcome of the agenda item was caused by any campaign contribution. The report provides no evidence of undue influence, a legal conflict of interest, or improper conduct by any Board member.

GRAND JURY RECOMMENDATIONS:

Grand Jury Recommendation #1:

The Grand Jury recommends that the Board amend Ordinance 963 to eliminate the exception in section 4(f) that allows unlimited campaign contributions from single contributors.

Response to Grand Jury Recommendation #1:

Recommendation will not be implemented because it is not warranted or reasonable.

Section 4(f) applies only when specified triggering events occur in a particular election and was adopted to address the practical consequences of those events within the structure of a local campaign contribution ordinance. The exemption was included deliberately as part of the ordinance's overall structure to address circumstances in which the financial conditions of a race materially change.

Grand Jury Recommendation #2:

The Grand Jury recommends that the Board either impose reasonable, mandatory limits on campaign contributions or accept the default limits proscribed by the PRA and FPPC regulations.

Response to Grand Jury Recommendation #2:

Recommendation will not be implemented because it is not warranted or reasonable.

The County does not agree that the contribution limits established by Ordinance 963 are unreasonable. Sections 4(a) and 4(b) establish local contribution limits for County elective offices, and those limits apply unless a specific triggering event identified in section 4(f) occurs in a particular election.

State law permits local jurisdictions to adopt their own mandatory contribution limits rather than rely on the default limits that apply only where no local ordinance governs. Riverside County exercised its local authority when it adopted Ordinance 963 after public consideration and vote. It should be noted that the Ordinance was considered and discussed over three separate Board public meetings (August 4, November 3, and November 10, 2020). The Ordinance was crafted in the context of the legal landscape, including the United States Supreme Court's decision in *Citizens United v. Federal Election Commission*, which limits the government's ability to restrict independent expenditures, and the concern that substantially lower direct contribution limits could drive campaign spending toward independent expenditures rather than candidate-controlled committees.

Grand Jury Recommendation #3:

The Grand Jury recommends that the Board amend their policy A-2(7) from the statement “Robert’s Rule of Order may be used as a general guide for the conduct of the Board’s meetings” to “Robert’s Rule of Order shall be used for the conduct of the meeting.” This holds supervisors to account for actions during the general meeting and promotes consistency for motions and passed.

Response to Grand Jury Recommendation #3:

Recommendation will not be implemented because it is not warranted or reasonable.

Board Policy A-2(7) currently provides that Robert’s Rules of Order may be used as a general guide for the conduct of Board meetings. The County does not believe it is warranted to replace that standard with a mandatory requirement that Robert’s Rules govern every aspect of Board proceedings.

The Board’s meetings are governed by applicable law, adopted Board policies, and the practical need to manage a public agenda efficiently. Retaining flexibility, under the Chair’s discretion, is appropriate to best conduct the public’s business based on the specific number of agenda items on any given Board meeting. It should be noted that Robert’s Rules were designed as a general parliamentary guide rather than a rigid code for all county meeting circumstances.

Grand Jury Recommendation #4:

The Grand Jury recommends that the Board adopt a policy that makes the Board’s general meeting a priority for scheduling and requires supervisors to defer any foreseeable conflicts.

Response to Grand Jury Recommendation #4:

Recommendation will not be implemented because it is not warranted or reasonable.

Attendance at Board meetings is a core responsibility and is treated as a scheduling priority. The County does not believe a new categorical policy is warranted because Board members also represent the County on regional, state, and local bodies, and occasional conflicts may arise despite reasonable efforts to avoid them. A rule requiring deferral of any foreseeable conflict would be difficult to administer and could impair the County’s representation on those bodies without materially improving the existing practice.

Grand Jury Recommendation #5:

The Grand Jury recommends that to the extent the Board believes it is reasonable to eliminate the exception in section 4(f) but maintain the \$20,000 limit in section 4(a) of Ordinance 963 rather than the state's limit, which is currently \$5,900 the Board should explain its rationale to the voters.

Response to Grand Jury Recommendation #5:

Recommendation will not be implemented because it is not warranted or reasonable.

As explained more fully in responses to Finding #3 and Recommendation #1, the County does not believe that it is warranted to eliminate the exception in section 4(f). Further, as explained more fully in response to Recommendation #2, the current ordinance was discussed and developed over the course of three public meetings. The Board's rationale for adopting a local limit rather than relying on the state default was presented and considered publicly during the ordinance adoption process.

Grand Jury Recommendation #6:

The Grand Jury recommends that in the event the Board does not remove section 4(f) from Ordinance 963, that they adopt a policy requiring supervisors to disclose the contributor and the precise amount at the time of a vote on an item, where that supervisor has received more than \$20,000 in cumulative campaign contributions from that person (as defined in the ordinance) since their last campaign cycle, and where the contributor (person) may have a vested interest in the item.

Response to Grand Jury Recommendation #6:

Recommendation will not be implemented because it is not warranted or reasonable.

The Political Reform Act already requires public disclosure of campaign contributions and expenditures, and those disclosures are available for public review through the applicable filing systems. The Board complies with those legal disclosure requirements.

The proposed standard would require Board members to make real-time, vote-by-vote determinations about whether a publicly disclosed contributor has a sufficiently direct or indirect interest in an item, even where no legal conflict or disqualification exists.

Grand Jury Recommendation #7:

The Grand Jury recommends that the Board add a section to Ordinance 963 requiring a vote of the people regarding any campaign limit changes and campaign contribution changes for any elected county official. This shall be administered on the same ballot for any primary or general election as the vote is held for elected officials.

Response to Grand Jury Recommendation #7:

Recommendation will not be implemented because it is not warranted or reasonable.

The Board is an elected representative body authorized to enact ordinances on behalf of Riverside County, subject to applicable law. Neither AB 571 nor the Political Reform Act requires campaign contribution limits to be adopted or amended only through a direct vote of the electorate.

The County does not believe it is warranted or reasonable to require voter approval for every campaign contribution limit change or campaign contribution ordinance amendment affecting County elected officials. Such a requirement could delay legally necessary or technical amendments, create additional election costs, and reduce the Board's ability to respond to changes in state law, FPPC guidance, judicial decisions, or administrative experience.

Flores, Kate

From: Brad Anderson <ba4612442@gmail.com>
Sent: Monday, June 8, 2026 7:50 PM
To: Clerk of the Board
Cc: cvmosquito@cvmvcd.org; District 4 Supervisor V. Manuel Perez
Subject: Public Comment - Riverside County Board of Supervisors meeting of June 9, 2026 (9:30AM) - AGENDA ITEM: 3.5

CAUTION: This email originated externally from the **Riverside County** email system. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe.

June 9, 2026

Riverside County Board of Supervisors (BoS)
Administrative Center | First Floor Board Chambers
4080 Lemon St.
Riverside, CA. 92501
Attention: Clerk of the Board of Supervisors

Re: Written testimony in regards to Agenda Item: 3.5. (BoS's Proceedings - response to Riverside County Grand jury Report - "Uncapped Influence: Campaign Contributions and Public Trust in Riverside County")

Dear current BoS members,

Please review my written statement listed prior to the consideration of agenda Item: 3.5 - Thank You.

It's disheartening to consider potential unethical behavior from Riverside County officials. But, it's reasonable that County and regional partners (City Governments) have similar situations that are commonly shared (business as usual techniques).

Clearly BoS public meetings have been mismanaged and manipulated to abandon best interests of the general public (Residents). City Governments (and other undesirable actors - Special Districts and regional JPA formed organizations) have been compromised by progressive elements in much the same fashion in the Great State of California.

It's reasonable that this Grand Jury investigative report was dismissed by BoS administration as has been witness by actions of other grand jury Report responses. (Such as: Coachella Valley Mosquito and Vector Control District, Indio, Calif). But, it's critical that this Grand Jury Report and the answers provided by BoS legal counsel be recognized and submitted into the public record while the pillars of our governmental institutions are still up-right and "Mostly" uncompromised? Riverside County BoS have the appearance of being compromised and have shown the likelihood of potential corrupted activity through it's written responses to this latest Riverside County Grand Jury Investigate Report.

Grand Jury Finding #4 - response from respondent (BoS) illustrates the distaste that County officials have for truthfulness and serving California residents. Simply that written response is disheartening and very disappointing - but was an expected response from current county officials.

Grand Jury Finding #3 - response from respondent (BoS) clearly shows that BoS monopoly over it's own procedures that will NOT be adapted (by reasonable standards to serve their communities).

Please refrain from any reprisal actions against my private property or person for reporting this true and accurate summary of concerns and opinions expressed.

Sincerely,

Brad Anderson | 37043 Ferber Dr. Rancho Mirage, CA. 92270

Cc: