

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.

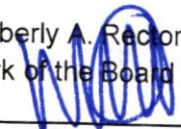
ACTION: Policy


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, County Counsel

6/4/2026

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.