About Citizens Take Action

Citizens Take Action is a nonpartisan, nonprofit organization dedicated to engendering more responsive government, increasing civic engagement, and ensuring that all Americans regardless of wealth or political affiliation have a meaningful opportunity to influence the political process. Since our founding we have championed reforms at the federal, state, and municipal level including publicly financed elections and increased transparency for the money behind political campaigns and advertisements. We are also one of the leading advocates for the passage of a constitutional amendment that would diminish the influence of big money in politics by allowing legislators and voters to enact limits on campaign contributions and expenditures.

For more information about Citizens Take Action you may contact us at info@citizenstakeaction.org or visit us at www.citizenstakeaction.org.

Author Acknowledgements

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I would also like to thank our supporters. As a grassroots organization we depend on small individual donors to continue our work. Thank you to each of our donors for helping make this report possible.

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About The Author

David Edward Burke is an attorney, writer, and activist based in Southern California. He is the founder of Citizens Take Action, a nonprofit organization focused on political reform and increasing civic engagement. A recognized expert on a constitutional amendment to get big money out of politics, David routinely speaks to political organizations and the general public on the topic of campaign finance reform. His work has gained widespread attention in such media as The Huffington Post, Washington Monthly, Salon, and the Los Angeles Times.

A graduate of the UCLA School of Law, David previously worked as a Congressional staffer and campaign coordinator. He has helped strengthen publicly financed elections in Los Angeles, and worked to pass California’s Proposition 2, which led to more humane treatment of animals nationwide. David is also an alumnus and former governing board member of the New Leaders Council.
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Overview

The fundamental danger posed by big money in politics is that it skews elections and government in favor of powerful interests, often against what is best for the vast majority of Americans. The problem starts even before any votes are cast. When it costs a lot of money to run for elected office, candidates spend significant amounts of time raising money—time that could be better spent learning about key issues, working toward solutions, and connecting directly with voters. Naturally, candidates want to raise the most money in the least amount of time, which leads them to seek out wealthy donors and powerful interests to fund the bulk of their campaigns. In many ways, the success of a political candidate’s campaign depends more on their ability to fundraise than on their ability to govern.

Once in office, large donors who supported a candidate often gain access to the newly elected official that small donors and non-donors do not get. This access, coupled with the representative’s awareness that large donors can be the difference between success and failure in the next election, leads many representatives to shift votes and decisions in favor of wealthy donors. That explains why a well-known study found that the chances of a policy being enacted greatly increase as more economic elites and interest groups support the policy, whereas the odds do not significantly increase as more average citizens support the policy. In other words, public policy in America is primarily driven by what wealthy donors and interest groups want, not by what the vast majority of voters want.

This problem affects every level of government—federal, state, and local. In fact, it is at the municipal level where campaign contributions and independent expenditures can make the most outsized impact. Because municipal campaigns cost less than state or federal campaigns, the impact of large campaign contributions is magnified. And since cities are not subject to many state and federal laws regarding the reporting and disclosure of campaign spending, it is typically more difficult for voters to discover who is funding their city council or mayoral campaign spending, it is typically more difficult for voters to discover who is funding their city council or mayoral campaign spending. In many ways, the success of a political candidate’s campaign depends more on their ability to fundraise than on their ability to govern.

In September 2021, the City of Industry’s corrupt government made headlines after four men, including former state Sen. Frank Hill were charged with stealing $20 million that was advanced to a company for a solar project that never materialized. In Alhambra, former councilwoman Barbara Messina was fined $14,000 by the Fair Political Practices Commission (“FPPC”) in 2006 for her role in creating a phony Independent Expenditure Committee that sent out mailers falsely claiming that her political opponent wanted to bring a casino to the city. Also in Alhambra in 2004, former Councilman John Parker Williams bribed then-Councilman Daniel Arguello with $25,000 on behalf of a developer. The developer’s project was approved, even though the bribe was discovered and Williams was sentenced to jail time. A full accounting of municipal elected officials who have accepted or solicited bribes, used campaign money to pay for personal expenses, or committed other legal and ethical violations is too long to list.

But perhaps more insidious than criminal acts are the legal, pay-to-play politics and self-dealing that occurs all too often at the municipal level. In 2009, reporting from the Los Angeles Times revealed that former Mayor Dave Perez of the City of Industry “owned trash-hauling and maintenance companies that racked up millions of dollars a year in contracts with the city” while Perez was the head of city government. In some cases, Perez’s companies billed six times a competitor’s rates, and an audit found that Perez’s companies “had made a fortune off the city, with contracts valued at more than $326 million.”

CORRUPTION: ILLEGAL AND PAY-TO-PLAY

Sometimes the misconduct is downright illegal. Former Los Angeles City Council members and their staff have admitted to accepting envelopes of cash from a businessman in a casino bathroom, seeking and accepting bribes from real estate developers, and being given expensive meals, hotel rooms, and escort services to curry their favor. In February, 2021 Ramon Medina, a former mayor and councilmember for the city of Maywood, was charged with soliciting bribes, conspiracy, embezzlement, failing to file campaign statements, grand theft, misappropriation of public funds and other crimes. Medina sought and received bribes from several co-defendants who wanted to gain favor and do business in Maywood.

2Michael Finnegan and David Zahniser, Englander sentenced to 14 months in prison in L.A. City Hall corruption case Los Angeles Times (January 25, 2021).
4Richard Winton, Bell city manager, ex-state senator, developer charged in corruption case Los Angeles Times (September 3, 2021).
6Hector Becerra Charges Cloud Image of Respected Businessman Los Angeles Times (October 16, 2004).
9Frank Shyong and Ruben Vives Companies tied to Industry ex-mayor racketed up fortune Los Angeles Times (April 27, 2015).
The city of Alhambra has a checkered history of pay-to-play alongside its record of elected officials involved in criminal misdeeds. Developer Arman Gabay, who was subsequently arrested on federal bribery charges, had his large development approved after contributing $5,000 to multiple councilmembers. Another developer hired the husband of a sitting councilmember as a consultant and paid him $6,000 per month to seek an amendment on the developer’s project. The city also awarded multiple no-bid contracts to business owners who made substantial contributions to sitting councilmembers.

In Santa Ana in 2018, a secretive group called Californians for Ethical Patient Care routed $170,000 through an apparent shell company into the city’s election without disclosing the money’s original source. The group has ties to a developer behind one of the city’s most controversial proposed projects, but because the LLC through which the $170,000 was funneled was formed so close to the election, voters had no way of knowing who was behind the mailers they received supporting or opposing various candidates.

In 2021, County of Orange officials were on the verge of selling a piece of Upper Newport Bay Park land to a wealthy political donor for just $13,000 until the deal was halted after citizens mobilized in opposition. In 2020, four current and former Newport Beach City Council members agreed to a $27,000 total fine with their political consultant and treasurer for failing to properly disclose campaign money that helped them get elected several years ago. Once again, the number of sweetheart deals for developers or contractors who made campaign contributions, or the suspicious entities behind political mailers is too large to list in its entirety.

The consequences of pay-to-play politics at the municipal level are undeniable. Development projects that are approved primarily because of timely campaign contributions can be detrimental to the quality of life for residents. Overpriced, no-bid city contracts awarded to large donors waste money that could be better spent improving parks, assisting residents in need, or enhancing community events and services. Mailers funded by dark money groups can prevent worthy candidates from reaching office. And all of the above diminish public trust in government. Fortunately, there are ways to protect elections and government from pay-to-play corruption.

PROTECTING THE INTEGRITY OF MUNICIPAL GOVERNMENT

There are two primary ways to protect government from the undue influence of large campaign contributions or independent expenditures. First, limits on the amount that individuals or Political Action Committees (“PACs”) can contribute directly to a candidate’s campaign can help minimize the threat of unfairly skewing policy in favor of the biggest donor. An elected official is less likely to be swayed by an individual or group that contributed $250 to their campaign than by a donor who contributed $2,500. Such limits have been common at the federal, state, and local level for decades, and have repeatedly been upheld by the Supreme Court under the rationale that they protect against both the reality and appearance of quid-pro-quo corruption.

Second, strong disclosure requirements and transparency of campaign finance data can offer additional protection against undue influence. Donors and elected officials are more likely to engage in pay-to-play arrangements if they know that key information is hidden from the public. A large campaign contribution followed by a favorable contract with the city or the approval of a development project will not attract attention if voters and journalists do not have access to the facts. However, if that information is readily available and easily accessible, that transparency serves as a deterrent against pay-to-play deals. Clearly presenting campaign finance data in a place that is easy to find on a city’s official website is an important safeguard against the type of legal corruption that afflicts so many municipal governments.

Other protections are available as well. Limits on the time period during which candidates can accept campaign contributions help prevent large donors from wielding influence contemporaneous with impending decisions, and encourages representatives to focus on governing rather than fundraising. Limits on cash contributions, anonymous contributions, and bans on donation bundling decrease the risk of donors sidestepping applicable laws. In larger cities publicly financed elections reduce candidates’ dependence on large donors. Additional disclosure requirements for mailers or other advertising offer protection against “dark money” leading up to an election.

12Ibid.
15Brandon Pho and Spencer Custodio CA Watchdog Proposes $27,000 Campaign Finance Fine on Newport Council Members Voice of OC (December 8, 2020).
Many cities throughout California have already put such protections in place. In 1998 the city of Thousand Oaks enacted $560 limits on contributions to candidates from individuals and independent expenditure committees. The city’s website currently has campaign finance data dating back to 2002 available to the public. Chula Vista, Santa Clarita, Agoura Hills, and Santa Rosa have each enacted campaign contribution limits of $500 or less per individual. And lest one think contribution limits are only feasible in smaller cities with inexpensive elections, San Diego, Los Angeles, Oakland, and San Francisco all have limits of $1,000 or less per individual contributor. San Diego goes even further, by prohibiting contributions from any type of organization, which ensures that only flesh and blood human beings can contribute to political candidates.

But the city of Alhambra may be the best example of how strong reforms can be put in place after a checkered history of both illegal and legal corruption. Citizens of the city organized and mobilized to get a sweeping reform package known as Measure V on the ballot in 2020. The reforms within Measure V included a $250 limit on campaign contributions from individuals to candidates and independent expenditure committees, a fundraising window of 18 months prior to an election, and a prohibition on contributions from developers, contractors, and PACs. Measure V also required the timely filing and posting of campaign finance data on the city’s official website. Voters responded enthusiastically to the proposed reforms, and Measure V passed with an overwhelming 76 percent of the vote.

There is no reason that the reforms put in place in Alhambra or Thousand Oaks or San Diego to protect the integrity of municipal government cannot be enacted elsewhere. Cities can serve as laboratories of innovation, with each example bringing us closer to government that truly represents we the people. But in order to reach that goal we must first know where we stand.

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17 San Diego Mun. Code. Sec. 27.2950.

**Purpose**

Citizens Take Action’s Report Card assesses the strength of municipal campaign finance laws, as well as the transparency of information about campaign contributions and expenditures in municipal elections. Individual reports are presented so that readers know which laws are in place in each city, and how publicly accessible key information is on any city’s official website. By putting information for every city in Orange County in one place, readers can see which cities have the strongest safeguards in place, which cities come up short, and gain a general sense of how common specific reforms and practices are throughout Orange County.

Points and letter grades were awarded to highlight how well cities protect themselves from both the reality, appearance, and threat of undue influence by large donors and special interests, as well as how effectively cities made critical information available to the public. Individualized recommendations for each city were included to offer a clear path forward for elected officials and residents who aim to strengthen municipal campaign finance laws and improve transparency.
Methodology

Project staff conducted research on cities by reviewing official city websites and municipal codes. The data was then confirmed with city officials. Once the data was confirmed, the city’s campaign finance laws, along with the transparency and thoroughness of publicly available information on campaign contributions and expenditures was scored based on the 100-point scale below. Cities were then given a cumulative letter grade based on their total score.

| Campaign contribution limits for individuals: | 0 to 20 points |
| Campaign contribution limits for Political Action Committees ("PACs"): | 0 to 20 points |
| Prohibitions or contribution limits on developers or contractors*: | 0 to 20 points |
| Limited fundraising window for candidates: | 0 to 20 points |
| California Forms 460, 496, and 497 available on the city’s official website: | 0 to 10 points |
| Ease of accessibility of Forms 460, 496, and 497 on the city’s official website: | 0 to 10 points |
| Years of California Forms 460, 496, and 497 are on the city’s official website: | 0 to 10 points |

*Because contribution limits on individuals and PACs apply to contractors and developers, cities with those limits in place received some points pertaining to limits on contractors and developers as well.

Every city was also eligible to receive up to 10 bonus points for going beyond the high standard in specific categories, or for having additional reforms in place, including but not limited to: limits or prohibitions on campaign contributions by lobbyists, limits on donation bundling or post-election accounts, enhanced disclosure requirements, voluntary expenditure limits, and publicly financed elections.

LETTER GRADING SCALE

| A+ 95 and above | C 45 to 54 |
| A 85 to 94 | C- 40 to 44 |
| A- 80 to 84 | D+ 35 to 39 |
| B+ 75 to 79 | D 25 to 34 |
| B 65 to 74 | D- 20 to 24 |
| B- 60 to 64 | F 0 to 19 |
| C+ 55 to 59 |
Key Findings

**CAMPAIGN CONTRIBUTION LIMITS**

As a whole, the majority of cities in Orange County scored very low in the area of campaign contribution limits. Of 34 cities, only 15 (44%) have enacted contribution limits on individuals and Political Action Committees ("PACs"). The remaining 19 cities have a default limit of $4,900, which was put in place through state law in 2021. Considering that many successful candidates at the municipal level spend less than $25,000 in their entire campaign, a default limit of $4,900 is very high, and it can give large donors outsized influence over an election.

**CITIES WITH CONTRIBUTION LIMITS**

Only four cities—Costa Mesa, Laguna Beach, Santa Ana, and Yorba Linda—have enacted separate limits or prohibitions focused on prospective city contractors, or on developers seeking approval from elected officials. Only two cities—Laguna Beach and Yorba Linda—have any limited fundraising window during which candidates can raise money for their campaign. Simply put, most cities in Orange County have not taken proactive steps to protect government against undue influence from large individual donors or special interests.

**TRANSPARENCY**

The vast majority of cities in Orange County had at least one of the California Fair Political Practices Commission Forms 460 (Recipient Campaign Committee Statement), 496 (24-hour/10-day Independent Expenditure Report), or 497 (24-hour/10-day Contribution Report) on their city’s official website. Most had all three forms and scored well as a result. Though there were some outliers with confusing websites, most of the cities made the data relatively easy to find. Visitors can usually find the forms through a link from the website’s homepage to a “City Clerk” or “Elections” section of the site.

Cities scored lower, on average, for the thoroughness of the campaign finance data available on their official website. While 21 of 34 (62%) published forms older than the last election cycle, 13 cities (38%) only published forms for the most recent election cycle or did not publish any forms whatsoever. Since most municipal elected officials serve four year terms, the absence of data older than the last election cycle poses a problem because it does not include each of the sitting representatives. Furthermore, since many representatives serve more than one term, data going back at least four election cycles is needed to show a complete history of any given representative’s campaign contributors.

**OVERALL GRADES**

Only seven cities in Orange County have strong campaign contribution limits on individuals and PACs coupled with thorough, easily accessible data on the city’s official website. For that reason, only seven cities received an A grade—Dana Point, Fountain Valley, Huntington Beach, Irvine, Laguna Beach, Laguna Woods, and Seal Beach. Eight cities received a F after scoring very low on both campaign contribution limits and transparency.

It is worth noting that a number of cities in Orange County could raise their grade by a full letter simply by passing a single campaign contribution limit or by taking small steps to improve the transparency of campaign finance data. In a city that does not have them, enacting campaign contribution limits on individuals or PACs could each raise the city’s overall grade by a full letter. Similarly, in cities that do not publish campaign finance data on their official website, posting that data going back four election cycles would also bump them up a full letter grade. A city that took all three of the aforementioned steps could raise their grade from a D to an A. Our general recommendations as well as individual recommendations for each city are detailed more thoroughly in subsequent sections of this report.
# Municipal Campaign Finance Report Card

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Recommendations

**ENACT CAMPAIGN CONTRIBUTION LIMITS OF $1,000 OR LESS ON INDIVIDUALS**

Limiting how much money an individual donor can contribute to a candidate’s campaign diminishes the threat of that donor receiving favorable treatment as a result of their contribution. We recommend a limit of $1,000 or less, adjusted for inflation, which is large enough to allow candidates to raise substantial amounts of money, but small enough to prevent a small group of donors from wielding outsized influence.

**ENACT CAMPAIGN CONTRIBUTION LIMITS OF $2,000 OR LESS ON POLITICAL ACTION COMMITTEES (PACS).**

Limiting how much money a Political Action Committee can contribute to a candidate’s campaign diminishes the threat of that PAC receiving favorable treatment as a result of their contribution. We recommend a limit of $2,000 or less, adjusted for inflation. The $2,000 limit is higher than the proposed $1,000 limit on individuals, due to the fact that PACs represent more than one individual. We believe the $2,000 limit is large enough to allow candidates to raise substantial amounts of money, but small enough to prevent PACs from wielding outsized influence.

**ENACT CAMPAIGN CONTRIBUTION LIMITS OF $500 OR LESS ON CITY CONTRACTORS AND DEVELOPERS FOR A MINIMUM OF 6 MONTHS/180 DAYS BEFORE AND AFTER THE CONSIDERATION/ACTION BY COUNCIL ON THE MATTER.**

One of the most dangerous forms of pay-to-play politics in municipal government is prospective city contractors or developers who are seeking city approval making large campaign contributions to improve the likelihood of a decision in their favor. Therefore, in addition to campaign contribution limits on individuals and PACs, we recommend explicit limits of $500 or less on contractors and developers for a minimum of 6 months/180 days before and after the consideration/action by council on the matter. Such limits drastically reduce the likelihood of an elected official’s impending vote or decision being swayed by a large, timely campaign contribution.

**ENACT A FUNDRAISING WINDOW OF ONE YEAR OR LESS ON CANDIDATES RUNNING FOR LOCAL OFFICE.**

The dangers of elected officials perpetually raising money are twofold. First, time spent raising money is time not spent on the issues that matter to voters. Second, if elected officials can receive contributions at any time, there is an increased risk that donors will make contributions close to an impending vote or decision by the elected official, seeking to influence the decision. Limiting the time during which a candidate can raise money addresses both of those problems. We recommend a fundraising window of one year or less before the next election in which the candidate is on the ballot.

**POST CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION FORMS 460, 496, AND 497 ON THE CITY’S OFFICIAL WEBSITE, DATING BACK AT LEAST FOUR ELECTION CYCLES.**

Data on which individuals and groups made campaign contributions or expenditures to support or oppose elected officials is essential in order to identify the reality, appearance, and threat of quid-pro-quo corruption. Therefore, we recommend that every city post the California Fair Political Practices Commission Forms 460, 496, and 497 for every candidate for municipal office directly on the city’s official website. It is also essential that voters have access to that information not just for the current or most recent election cycle, but dating back far enough to see contributions made to every sitting council member. We recommend that cities post data going back at least four election cycles to ensure sufficient transparency.

**ADD A LINK TO THE PAGE CONTAINING CALIFORNIA FAIR POLITICAL PRACTICES COMMISSION FORMS 460, 496, AND 497 DIRECTLY TO THE CITY WEBSITE’S HOMEPAGE.**

Posting necessary campaign finance data on the city’s official website will not do much good if visitors can’t find it. We recommend putting a link titled “Campaign Finance Disclosures” somewhere directly on the home page of the city’s official website so that visitors can quickly and easily access a candidate’s California Fair Political Practices Commission Forms.
INDIVIDUAL REPORTS AND RECOMMENDATIONS
Aliso Viejo | 22/100 | D-

**SUMMARY**

Aliso Viejo has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Aliso Viejo also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Aliso Viejo only received 2 out of 70 possible points for campaign finance limits.

Aliso Viejo received 20 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website. The city did not score well for thoroughness of data, however, as the information only goes back to the 2020 election.

Due to the complete absence of any limits on campaign contributions, and the lack of thoroughness in publicly available campaign finance data, Aliso Viejo received a D- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/ action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

Anaheim | 64/100 | B-

**SUMMARY**

Anaheim has a $2,200 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Anaheim does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The relatively high limit on contributions from individuals, coupled with the absence of limits on contractors, and developers, makes local elections and government vulnerable to undue influence from large donors. As a result, Anaheim only received 32 out of 70 possible points for campaign finance limits.

Anaheim received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website. The data also goes back to 2006, which covers every sitting elected official as well as many former officials. For strong transparency, Anaheim received bonus points.

The combination of an average score for campaign finance limits and a high score for transparency of campaign finance data resulted in Anaheim receiving a B- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/ action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
Brea | 30/100 | D

SUMMARY
Brea has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Brea also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Brea only received 2 out of 70 possible points for campaign finance limits. Brea received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and relatively expenditures is easy to find on the city’s website. The data also goes back to 2010, which covers every sitting elected official as well as many former officials.

The combination of a very low score for the lack of limits on campaign contributions and a high score for transparency of campaign finance data resulted in Brea receiving a D for its overall grade.

RECOMMENDATIONS
• Enact campaign contribution limits of $1,000 or less on individuals.
• Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
• Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
• Enact a fundraising window of one year or less on candidates running for local office.
• Add a link to campaign disclosure statements directly to the city website’s homepage.

Buena Park | 7/100 | F

SUMMARY
Buena Park has a $4,000 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Buena Park also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The high limit on campaign contributions from individuals and PACs, which is among the highest of any city that has enacted such limits, coupled with the absence of limits on contractors, and developers, makes local elections and government vulnerable to undue influence from large donors. As a result, Buena Park only received 7 out of 70 possible points for campaign finance limits.

Buena Park received 1 out of 30 possible points for the transparency of campaign finance data. No FPPC 460, 496, or 497 forms are posted on the city’s official website.

Due to the very high $4,000 limit on campaign contributions from individuals and PACs, the absence of any limits on, contractors, or developers, and the lack of easy access to campaign finance data on the city’s website, Buena Park received a F for its overall grade.

RECOMMENDATIONS
• Enact campaign contribution limits of $1,000 or less on individuals.
• Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
• Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
• Enact a fundraising window of one year or less on candidates running for local office.
• Add a link to campaign disclosure statements directly to the city website’s homepage.
• Update the city’s website so that campaign finance data is easily accessible to all visitors.
• Post campaign disclosure statements dating back at least four election cycles on the city’s website.
**Costa Mesa | 53/100 | C**

**SUMMARY**

Costa Mesa has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). Costa Mesa does have an ordinance preventing council members from accepting, soliciting, or directing a contribution of $250.00 or more from any party while a proceeding involving a license, permit, or other entitlement for use is pending before city council and for three (3) months following the date a final decision is rendered. There is no limited fundraising window during which candidates can raise money. Though the limit on parties with business pending before the city council is strong, the absence of campaign contribution limits enacted on individuals or PACs more broadly makes local elections and government vulnerable to undue influence from large donors. As a result, Costa Mesa only received 22 out of 70 possible points for campaign finance limits.

Costa Mesa received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website. The data also goes back to 2012, which covers every sitting elected official as well as many former officials. For exemplary transparency, Costa Mesa received bonus points. The city was also given bonus points for a prohibition on campaign contributions from employees of a candidate’s agency.

The combination of a low score for campaign finance limits and a very high score for transparency of campaign finance data resulted in Costa Mesa receiving a C for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.

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**Cypress | 19/100 | F**

**SUMMARY**

Cypress has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). Cypress also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Cypress only received 2 out of 70 possible points for campaign finance limits.

Cypress received 17 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relative easy to find on the city’s website. However, the data only goes back to 2020, which does not cover every sitting elected official.

The combination of a very low score for campaign finance limits and an average score for transparency of campaign finance data resulted in Cypress receiving a F for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Dana Point | 91/100 | A

SUMMARY

Dana Point has a strong $810 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Dana Point has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. But the $810 limit offers significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city also does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals, and PACs, Dana Point received 56 out of 70 possible points for campaign finance limits.

Dana Point received a perfect score—30 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website. The data also goes back to 2004, which covers every sitting elected official as well as many former officials. For exemplary transparency, Dana Point received bonus points. The city was also given bonus points for having a campaign contribution limit under $1,000.

The combination of an above average score for campaign finance limits and a perfect score for transparency of campaign finance data resulted in Dana Point receiving an A for its overall grade.

RECOMMENDATIONS

• Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
• Enact a fundraising window of one year or less on candidates running for local office.

Fountain Valley | 91/100 | A

SUMMARY

Fountain Valley has a strong $500 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Those limits offer significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. However, the city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs or Fountain Valley received 60 out of 70 possible points for campaign finance limits.

Fountain Valley received 27 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website. The data also goes back far enough to cover every sitting elected official as well as many former officials. The city was given bonus points for having a campaign contribution limit under $1,000.

Due to the city’s strong limit on campaign contributions and strong score for transparency of campaign finance data Fountain Valley receiving an A for its overall grade.

RECOMMENDATIONS

• Enact a fundraising window of one year or less on candidates running for local office.
• Add a link to campaign disclosure statements directly to the city website’s homepage.
**Fullerton** | **17/100** | **F**

**SUMMARY**
Fullerton has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Fullerton also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Fullerton only received 2 out of 70 possible points for campaign finance limits.

Fullerton received 15 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s website, but it is not particularly easy to find, and it only goes back to 2020, which does not cover every sitting elected official.

The combination of a very low score for campaign finance limits and an average score for transparency of campaign finance data resulted in Fullerton receiving a F for its overall grade.

**RECOMMENDATIONS**
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

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**Garden Grove** | **26/100** | **D**

**SUMMARY**
Garden Grove has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Garden Grove also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Garden Grove only received 2 out of 70 possible points for campaign finance limits.

Garden Grove received 24 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, and the data goes back to 2016, which covers every sitting council member.

The combination of a very low score for campaign finance limits and a solid score for transparency of campaign finance data resulted in Garden Grove receiving a D for its overall grade.

**RECOMMENDATIONS**
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Huntington Beach | 91/100 | A

**SUMMARY**

Huntington Beach has a strong $620 limit on campaign contributions by individuals and Political Action Committees against prospective contractors or developers using campaign contributions to curry favor with elected officials. However, the city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs, Huntington Beach received 58 out of 70 possible points for campaign finance limits.

Huntington Beach received 26 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website. The data also goes back to 2008, which covers every sitting elected official as well as many former officials. Huntington Beach was given bonus points for having a campaign contribution limit under $1,000, and for a prohibition on candidates contributing to other candidates.

The combination of a better than average score for campaign finance limits and a high score for transparency of campaign finance data resulted in Huntington Beach receiving an A for its overall grade.

**RECOMMENDATIONS**

- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.

Irvine | 93/100 | A

**SUMMARY**

Irvine has a strong $550 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Irvine has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials, but the strong contribution limit has the same effect. The city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs, Irvine only received 58 out of 70 possible points for campaign finance limits.

Irvine received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website. The data also goes back to 2014, which covers every sitting elected official as well as many former officials. Irvine was given bonus points for exemplary transparency and for having a campaign contribution limit on individuals under $1,000.

The combination of a better than average score for campaign finance limits and a high score for transparency of campaign finance data resulted in Irvine receiving an A for its overall grade.

**RECOMMENDATIONS**

- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
La Habra | 16/100 | F

SUMMARY
La Habra has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). La Habra also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, La Habra only received 2 out of 70 possible points for campaign finance limits.

La Habra received 14 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s website, but it is not particularly easy to find, one of the links is broken, and it only goes back to the most recent election, which does not cover every sitting elected official.

The combination of a very low score for campaign finance limits and a below average score for transparency of campaign finance data resulted in La Habra receiving a F for its overall grade.

RECOMMENDATIONS
• Enact campaign contribution limits of $1,000 or less on individuals.
• Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
• Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
• Enact a fundraising window of one year or less on candidates running for local office.
• Add a link to campaign disclosure statements directly to the city website’s homepage.
• Post campaign disclosure statements dating back at least four election cycles on the city’s website.

La Palma | 18/100 | F

SUMMARY
La Palma has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). La Palma also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, La Palma only received 2 out of 70 possible points for campaign finance limits.

La Palma received 16 out of 30 possible points for the transparency of campaign finance data. There are some FPPC 460 forms posted on the city’s official website, but they are not particularly easy to find. The data also only goes back to 2021, which does not cover every sitting city council member.

Due to the very low score for campaign finance limits and the lack of easy access to thorough campaign finance data on the city’s website, La Palma received a F for its overall grade.

RECOMMENDATIONS
• Enact campaign contribution limits of $1,000 or less on individuals.
• Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
• Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
• Enact a fundraising window of one year or less on candidates running for local office.
• Add a link to campaign disclosure statements directly to the city website’s homepage.
• Update the city’s website so that campaign finance data is easily accessible to all visitors.
• Post campaign disclosure statements dating back at least four election cycles on the city’s website.
**Laguna Beach | 93/100 | A**

**SUMMARY**

Laguna Beach has a strong $440 limit on campaign contributions by individuals Political Action Committees (“PACs”). Laguna Beach has also enacted a prohibition on campaign contributions by prospective city contractors, or on developers who currently have, or had business before the candidate within the preceding twelve months, which is an important safeguard. However, the statutory language of that prohibition is confusing, and it isn’t entirely clear that it applies as intended. The $440 limit on individuals and PACs does, on its own, offer significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. However, the city does not have any short fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals, and PACs, Laguna Beach received 60 out of 70 possible points for campaign finance limits.

Laguna Beach received 24 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s website, but it is relatively difficult to find. The data goes back to 2012, which covers every sitting elected official as well as many former officials. Laguna Beach was given bonus points for having a campaign contribution limit on individuals under $1,000, and for a prohibition on candidates contributing to other candidates.

The combination of a high score for campaign finance limits and a high score for transparency of campaign finance data resulted in Laguna Beach receiving an A for its overall grade.

**RECOMMENDATIONS**

- Clarify existing statutory language pertaining to the prohibition of contributions from people with business before the candidate.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.

**Laguna Hills | 84/100 | A-**

**SUMMARY**

Laguna Hills has a strong $1,000 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Laguna Hills has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. The $1,000 limit offers significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city also does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs, Laguna Hills received 54 out of 70 possible points for campaign finance limits.

Laguna Hills received a perfect score—30 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions is easy to find on the city’s website. The data also goes back to 2017, which covers every sitting elected official.

The combination of an above average score for campaign finance limits and a very high score for transparency of campaign finance data resulted in Laguna Hills receiving an A- for its overall grade.

**RECOMMENDATIONS**

- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
### Laguna Niguel | 84/100 | A-

**SUMMARY**

Laguna Niguel has a strong $1,000 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Laguna Niguel has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. The $1,000 limit offers significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city also does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs, Laguna Niguel received 54 out of 70 possible points for campaign finance limits.

Laguna Niguel received a perfect score—30 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website. The data also goes back to 2014, which covers every sitting elected official.

The combination of an above average score for campaign finance limits and a very high score for transparency of campaign finance data resulted in Laguna Niguel receiving an A- for its overall grade.

**RECOMMENDATIONS**

- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.

### Laguna Woods | 91/100 | A

**SUMMARY**

Laguna Woods has a strong $250 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Laguna Woods has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials, but the $250 limit has the effect of providing protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limits on individuals and PACs Laguna Woods received 60 out of 70 possible points for campaign finance limits.

Laguna Woods received 25 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, and the data goes back to 2016, which covers every sitting council member. Laguna Woods was given bonus points for having a campaign contribution limit on individuals under $1,000.

The combination of a strong for campaign finance limits and a solid score for transparency of campaign finance data resulted in Laguna Woods receiving an A for its overall grade.

**RECOMMENDATIONS**

- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Lake Forest | 30/100 | D

SUMMARY
Lake Forest has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). Lake Forest also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Lake Forest only received 2 out of 70 possible points for campaign finance limits.

Lake Forest received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates' campaign contributions and expenditures is relatively easy to find on the city's website. The data also goes back to 2015, which covers every sitting elected official as well as many former officials.

The combination of a very low score for campaign finance limits and a high score for transparency of campaign finance data resulted in Lake Forest receiving a D for its overall grade.

RECOMMENDATIONS
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website's homepage.

Mission Viejo | 4/100 | F

SUMMARY
Mission Viejo has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). Mission Viejo also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Mission Viejo only received 2 out of 70 possible points for campaign finance limits.

Mission Viejo received 2 out of 30 possible points for the transparency of campaign finance data. There is a link to campaign finance data on the city’s official website, but the relevant forms do not show up under the link.

The combination of a very low score for campaign finance limits and a very low score for transparency of campaign finance data resulted in Mission Viejo receiving a F for its overall grade.

RECOMMENDATIONS
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Update the city’s website so that campaign finance data is easily accessible to all visitors.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Newport Beach | 70/100 | B

**SUMMARY**

Newport Beach has a strong $1,200 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Newport Beach has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. The $1,200 limit on individuals and PACs does offer some protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city also does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals and PACs, but no unique limit on contractors or developers or a limited fundraising window, Newport Beach received 48 out of 70 possible points for campaign finance limits.

Newport Beach received 28 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website. The data also goes back to 2014, which covers every sitting elected official as well as many former officials.

The combination of an average score for campaign finance limits and a high score for transparency of campaign finance data resulted in Newport Beach receiving an B for its overall grade.

**RECOMMENDATIONS**

- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.

Orange | 80/100 | A-

**SUMMARY**

Orange has a strong $1,000 limit on campaign contributions by individuals and Political Action Committees (“PACs”). Orange has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. The $1,000 limit does offer some protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals, and PACs, Orange received 54 out of 70 possible points for campaign finance limits.

Orange received 23 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, and the data goes back to 2018, which covers every sitting council member. Orange was given bonus points for a prohibition on candidates contributing to each other.

The combination of an above average score for campaign finance limits and a solid score for transparency of campaign finance data resulted in Orange receiving an A- for its overall grade.

**RECOMMENDATIONS**

- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Placentia | 23/100 | D-

SUMMARY
Placentia has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Placentia also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Placentia only received 2 out of 70 possible points for campaign finance limits.

Placentia received 21 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, but the data only goes back to 2020, which does not cover every sitting council member.

The combination of a very low score for campaign finance limits and an average score for transparency of campaign finance data resulted in Placentia receiving a D- for its overall grade.

RECOMMENDATIONS
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

Rancho Santa Margarita | 27/100 | D

SUMMARY
Rancho Santa Margarita has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Rancho Santa Margarita also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Rancho Santa Margarita only received 2 out of 70 possible points for campaign finance limits.

Rancho Santa Margarita received 25 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is easy to find on the city’s website, and the data goes back to 2018, which covers every sitting council member.

The combination of a very low score for campaign finance limits and a solid score for transparency of campaign finance data resulted in Rancho Santa Margarita receiving a D for its overall grade.

RECOMMENDATIONS
- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
**San Clemente | 23/100 | D-**

**SUMMARY**

San Clemente has not enacted any limits on campaign contributions by individuals or Political Action Committees ("PACs"). San Clemente also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, San Clemente only received 2 out of 70 possible points for campaign finance limits.

San Clemente received 21 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s website, but it is not particularly easy to find. The data goes back to 2018, which covers every sitting elected official.

The combination of a very low score for campaign finance limits and an average score for transparency of campaign finance data resulted in San Clemente receiving a D- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

**San Juan Capistrano | 83/100 | A-**

**SUMMARY**

San Juan Capistrano has a strong $580 limit on campaign contributions by individuals and Political Action Committees ("PACs"). San Juan Capistrano has not enacted unique prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials, but the $580 limit offers significant protection against prospective contractors or developers using campaign contributions to curry favor with elected officials. The city does not have any limited fundraising window during which candidates can raise money. Due to a strong contribution limit on individuals, and PACs San Juan Capistrano received 58 out of 70 possible points for campaign finance limits.

San Juan Capistrano received 20 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, but the data only goes back to 2020, which does not cover every sitting council member. San Juan Capistrano was given bonus points for having a campaign contribution limit on individuals under $1,000.

The combination of an above average score for campaign finance limits and an average score for transparency of campaign finance data resulted in San Juan Capistrano receiving an A minus for its overall grade.

**RECOMMENDATIONS**

- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Santa Ana received 25 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s official website but it is not particularly easy to find. The data also goes back to 2013, which covers every sitting elected official as well as many former officials. Santa Ana received bonus points for its very thorough data.

The combination of a better than average score for campaign finance limits and a solid score for transparency of campaign finance data resulted in Santa Ana receiving an A- for its overall grade.

RECOMMENDATIONS

- Extend the prohibition on contributions from people with business before the council to a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.

Seal Beach received 26 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s official website but it is not particularly easy to find. The data also goes back to 2001, which covers every sitting elected official as well as many former officials. Seal beach received bonus points for its very thorough data, and for having a campaign contribution limit on individuals under $1,000.

The combination of an above average score for both campaign finance limits and transparency of campaign finance data resulted in Seal Beach receiving an A for its overall grade.

RECOMMENDATIONS

- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
**Stanton | 22/100 | D-**

**SUMMARY**

Stanton has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Stanton also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Stanton only received 2 out of 70 possible points for campaign finance limits.

Stanton received 20 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, but the data only goes back to 2020, which does not cover every sitting council member.

The combination of a very low score for campaign finance limits and an average score for transparency of campaign finance data resulted in Stanton receiving a D- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

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**Tustin | 18/100 | F**

**SUMMARY**

Tustin has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Tustin also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Tustin only received 2 out of 70 possible points for campaign finance limits.

Tustin received 16 out of 30 possible points for the transparency of campaign finance data. Some, but not all of information on candidates’ campaign contributions and expenditures is on the city’s website, and it is difficult to find because the information is under different headings and links. The data typically only goes back two election cycles.

The combination of a very low score for campaign finance limits and a low score for transparency of campaign finance data resulted in Tustin receiving a F for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Update the city’s website so that campaign finance data is easily accessible to all visitors.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
**Villa Park**  |  18/100  |  F

**SUMMARY**

Villa Park has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Villa Park also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Villa Park only received 2 out of 70 possible points for campaign finance limits.

Villa Park received 16 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is on the city’s website, but it is not particularly easy to find, and it only goes back to 2020, which does not cover every sitting elected official.

The combination of a very low score for campaign finance limits and a below average score for transparency of campaign finance data resulted in Villa Park receiving a F for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.

**Westminster**  |  20/100  |  D-

**SUMMARY**

Westminster has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Westminster also does not have any prohibitions or limits on campaign contributions by prospective city contractors, or on developers seeking approval from local officials. Nor is there a limited fundraising window during which candidates can raise money. The absence of such limits makes local elections and government vulnerable to undue influence from large donors. As a result, Westminster only received 2 out of 70 possible points for campaign finance limits.

Westminster received 18 out of 30 possible points for the transparency of campaign finance data. The information on candidates’ campaign contributions and expenditures is relatively easy to find on the city’s website, but the data only goes back to 2020, which does not cover every sitting council member.

The combination of a very low score for campaign finance limits and a below average score for transparency of campaign finance data resulted in Westminster receiving a D- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a prohibition or campaign contribution limits of $500 or less on city contractors or developers for a minimum of 6 months/180 days from the consideration/action by council on the matter.
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.
Yorba Linda has not enacted any limits on campaign contributions by individuals or Political Action Committees (“PACs”). Yorba Linda has enacted a prohibition on the solicitation of campaign contributions from city contractors as well as a $250 limit on contributions twelve months from final decision in any proceeding before the council involving a permit, license, contract, or other land use entitlement from the applicant, contractor, or direct recipient, which is the strongest prohibition of its kind in Orange County. However, the absence of any limit on PACs makes local elections and government vulnerable to undue influence from large donors. The city also does not have any limited fundraising window during which candidates can raise money. Due to strong prohibitions on contributions from contractors and developers, but no limits on individuals or PACs, or a short fundraising window, Yorba Linda only received 22 out of 70 possible points for campaign finance limits.

Yorba Linda received 2 out of 30 possible points for the transparency of campaign finance data. There is a link to campaign finance data on the city’s official website, but the link does not work.

The combination of a low score for campaign finance limits and a very low score for transparency of campaign finance data resulted in Yorba Linda receiving a D- for its overall grade.

**RECOMMENDATIONS**

- Enact campaign contribution limits of $1,000 or less on individuals.
- Enact campaign contribution limits of $2,000 or less on Political Action Committees (PACs).
- Enact a fundraising window of one year or less on candidates running for local office.
- Add a link to campaign disclosure statements directly to the city website’s homepage.
- Update the city’s website so that campaign finance data is easily accessible to all visitors.
- Post campaign disclosure statements dating back at least four election cycles on the city’s website.