



Campaign Finance and Ethics Commission

AGENDA STAFF REPORT

MEETING DATE: October 27, 2025

Agenda Item: Three

SUBJECT: Review and Give Direction to Executive Director regarding Transmittal of 2025 Annual Report to Board of Supervisors.

RECOMMENDED ACTION: Approve version of Annual Report with updates as required for year-end accuracy and/or as amended by Commission.

Background:

The Campaign Reform Ordinance provides that the Chair of the Commission shall prepare an annual report of the Commission's activities and submit it to the Board of Supervisors.

Specifically, Orange County Codified Ordinance section 1-2-360(e) provides "[t]he Chair of the Commission shall prepare an annual report summarizing Commission activities. This report shall be reviewed and approved by a majority vote of the Commission and presented to Board of Supervisors as an agenda item at a regularly scheduled Board meeting."

Attached as Exhibit A is a proposed draft of the 2025 Annual Report. Some statistics have yet been finalized, therefore, this report is subject to update once the information is finalized.

Campaign Finance and Ethics Commission

Annual Report 2025

Presented by Chairman Reza Karkia



INTRODUCTION

It is with great enthusiasm that I present the 2025 Annual Report of the Campaign Finance and Ethics Commission. This year marks a significant milestone — almost ten years of service to the County of Orange. I can think of no better way to commemorate this occasion than by offering both a retrospective look at the Commission’s progress and a review of our work over the past year.

The accomplishments reflected in this report were made possible by the dedication of those who served before us and by the outstanding group of Commissioners with whom I have had the privilege to work with over nearly three years. It has been my honor to serve as Chairman of the Commission for the past two years.

This report also stands as a gesture of gratitude to the community members whose vision and commitment led to the Commission’s creation and who continue to support our mission. Finally, I extend my sincere thanks and congratulations to the staff whose professionalism and steadfast support have been vital to the Commission’s success.

A LOOK BACK

In June 2016, almost 70% of Orange County voters approved the ballot measure that created the Orange County Campaign Finance and Ethics Commission. However, that measure was not the beginning of campaign finance in the County. The County of Orange has had campaign finance rules since 1978. Those first laws were commonly known as TINCUP and were a result of community members qualifying an initiative for the ballot which the Board of Supervisors subsequently enacted into law. Prior to 2016, the only enforcement mechanism found on the law was criminal prosecutions through the District Attorney’s office.

From 1998 to 2008, community members instrumental in the passage of TINCUP advocated for enforcement to be turned over to a commission. In 2008, an ad hoc committee was established by the Board of Supervisors, but no commission resulted. Then in 2014, the Board once again considered forming a commission. Working with the same community members who had continuously advocated for campaign finance reform and a commission, an ordinance was drafted that established an oversight body in addition to the District Attorney. This ordinance was placed on the June 2016 ballot. Thus, after 18 years of public advocacy and leadership from the Board of Supervisors, the Campaign Finance and Ethics Commission was established.

The next milestone for the Commission came in March 2017 when the first Executive Director, Denah Hoard was hired. The first meeting of the Orange County Campaign Finance and Ethics Commission meeting was held in October 2017. Since the Commission has been fully staffed there have been 28 meetings – held on a quarterly basis. During 2020 and 2021, the Commission met via video conferencing to continue its oversight of the County’s Campaign Reform Ordinance, Lobbyist Registration and Reporting Ordinance, the Gift Ban Ordinance, and Sections 6 and 9 of the County Code of Ethics and Commitment to Public Service (“Code of Ethics”). Incredibly, the Commission has not been required to serve as the appellate body to a decision related to enforcement. This is a testament to the ordinance’s drafters and the law’s emphasis – compliance rather than punishment.

Furthermore, the Commission has provided oversight of the Executive Director who established and manages the Office of Campaign Finance and Ethics Commission. Under her leadership, the Office has effectively enforced the regulations within the Commission’s jurisdiction and delivered valuable training to County employees and community organizations—all accomplished with the support of just one staff member. Since her appointment, Denah has spearheaded enhancements to the AB1234 training policy, the lobbyist registration process, and the County’s Code of Ethics.

THE STATISTICS

In an effort to facilitate timely compliance, the Office of Campaign Finance and Ethics Commission has devoted thousands of hours to auditing campaign finance filings proactively, ensuring accountability without relying solely on complaints.

The breakdown of contributions audited is as follows:

Year	Total Contributions	Number of Candidates
2025	\$938,010*	13
2024	\$2,002,978	16
2023	\$2,925,288	17
2022	\$4,616,438	31
2021	\$3,983,800	27
2020	\$2,933,603	23
2019	\$2,791,985	23
2018	\$3,587,649	34
2017	\$3,788,026	20
Grand Total	27,567,777.04	

*partial year

Moreover, since 2018, the Office has effectively run the Lobbyist Registration and Reporting program. To decrease administration costs, lobbyists now receive renewal notices and invoices in November of each year. This has dramatically increased receipt of timely renewals and payments and eliminated the need to fine lobbyists for late renewals. Additionally, updates to lobbyist information are now completed within 1 business day of receipt and immediately found online via the Office's website. Previous information changes would only be available on a quarterly basis. This provides the public with almost instant and easily accessible information. Notably, fees for the lobbyist program have not been increased since the program began in 2006. The following statistics show the revenue collected since 2018. This revenue only recovers about 25% of the program cost.

Year	Revenue	Avg # of Lobbyists
2025	\$4,075*	74
2024	\$4,650	80
2023	\$5,050	88
2022	\$4,550	73
2021	\$4,275	74
2020	\$4,825	86
2019	\$4,050	74
2018	\$5,050	85
Total	\$36,525	

*partial year

In addition to campaign finance and lobbyist duties, the Office is tasked with ensuring all Orange County Boards, Commissions and Committees are compliant with state mandated ethics training. Approximately 300 people are required to take this training – commonly referred to as AB1234 training - every two years. The Office developed and maintains a database to monitor compliance while also communicating with the individuals three (3) times per year. Since 2018, the office has provided dozens of AB1234 trainings both in person and online. This training allows discussion of the Orange County rules such as the Gift Ban and Code of Ethics.

As the personalized trainings have been so well received, the Executive Director has also conducted dozens of trainings and presentations on various topics related to ethics and campaign finance. These groups include:

County Procurement – Ethics for DPAs
 Newly Elected Officials and Staff
 League of Women Voters
 California Professional Treasurer Association
 Orange County City Attorney’s Association
 Anaheim City Council

THIS YEAR

A number of exciting changes occurred in 2025. In October, we had the appointment of a new Commissioner, James Lawson who replaces Justice David Thompson, ret. The loss of Justice Thompson from the Commission was a disappointment, but we are thrilled to be fully staffed once again. Notably, even with a vacant position, the Commission met quorum requirement in each quarter of 2025 and successfully fulfilled each of its core duties. The Commission yet again proved to be dedicated to the oversight of the County's Campaign Reform Ordinance, Lobbyist Registration and Reporting Ordinance, the Gift Ban Ordinance and Sections 6 and 9 of the County Code of Ethics and Commitment to Public Service.

The Office also saw positive changes with the migration of its emails and website to the oc.gov domain. This will only further assist the public in understanding the governmental role the Commission plays. A special thank you to Orange County's IT department for making this transition without impact on daily business. In keeping with the effort to be fully transparent, the Commission website has been updated with pictures and biographies of staff and Commission members. Finally, the Office is undergoing construction which will decrease the footprint size by two-thirds. This is part of the County's ongoing effort to maximize use of all available space and minimize costs to the General Fund. These efforts were already undertaken as the Commission has been meeting in a conference room graciously shared by Orange County Community Services.

The Executive Director reports that 2025 has been a typical year with 10 complaints and approximately 2-5 requests for advice each week. The requests for advice have increased just slightly as 2026 will be an election year and 8 new candidates have opened campaign committees. Efforts are currently underway to raise awareness of the Campaign Finance Manual, ensuring that new candidates and their treasurers know how to access and utilize this important resource. Moreover, the Office is excited to be working with Human Resources and County Counsel to create an educational video about the Code of Ethics, the

Fraud Hotline, and the resources available to employees for reporting misconduct. It is hoped in the year to come this video will expand into further County wide training.

Finally, in our role overseeing the Executive Director, we are pleased to report that she has successfully fulfilled all her responsibilities in 2025. She continues to maintain a robust educational program, remains readily available to address questions and concerns, and conducts timely, detailed audits of all relevant filings. Additionally, she has reviewed and evaluated the campaign finance contribution limit for adjustment. We look forward to the continued excellence and professionalism demonstrated by the Office under her leadership.

ACKNOWLEDGMENT

Thank you to the Board of Supervisor for supporting this important work and taking the time to review this report. I wish to recognize the Commission and staff by name for their dedicated service. My heartfelt thanks to:

Vice Chair Judson Brown
Commissioner Franz Miller, Judge Retired
Commissioner William Halle, Esq.
James Steinmann, Senior Deputy County Counsel
Denah Hoard, Executive Director
Jasmine Mo, Business Services Administrator

Dr. Reza Karkia, DBA, ACFEI, CHS-III
Chairman, Orange County Campaign Finance and Ethics Commission