

December 9th, 2025

Oakland Public Ethics Commission

1 Frank H. Ogawa Plaza
Oakland, CA 94612



Re: Agenda Item #4 – Proposed Amendments to the Oakland Campaign Reform Act.

Dear Chair Francis Upton IV and fellow Ethics Commissioners,

California Common Cause is a nonpartisan, good-government 501(c)(3) organization dedicated to advancing pro-democracy reforms that strengthen representation, transparency, and accountability at all levels of government.

We write in respectful **opposition** to the proposal to amend section 3.12.045 of the Oakland Campaign Reform Act to increase the annual contribution limits to officeholder accounts so they match the temporarily increased limits to a local candidate's campaign account. Doing so will create more opportunities for undue influence and the perception of pay-to-play, and it will increase officeholder reliance on donations from people and entities seeking entitlements from the City.¹

Oakland already allocates district-specific funds through the City budget, giving council members discretionary resources for constituent services. Officeholder accounts are layered on top of these public funds but are used more for officeholder expenses than constituent services (although there may be some overlap). Additionally, unlike Oakland's campaign contribution limits that apply to an election cycle (i.e., four years), contribution limits for officeholder accounts reset every year. Under current law, a donor who contributes the maximum \$900 to a council member's campaign over a four-year cycle can also contribute up to \$2,600 to that official's officeholder account in the same period. Raising the annual officeholder limit to \$900 would increase this total to \$3,600-- more than five times the allowable contribution to a campaign account-- magnifying both the reality and appearance of donor influence.

We agree with the Ethics Commission's unanimous May recommendation opposing this amendment and believe the Commission's concerns remain well-founded. Specifically:

- Increasing the annual limit provides large donors with additional avenues to give more money to elected officials, heightening the risk of real or perceived conflicts of interest.
- It is unclear what problem the increase is intended to solve, particularly because officials already may solicit unlimited behested payments for bona fide governmental or charitable purposes.

¹ See the Ethics Commission staff's analysis on page 7 (first two full paragraphs) of the [Dec 10th, 2025 Oakland Public Ethics Commission meeting agenda](#)

- Existing rules governing the use and solicitation of officeholder funds may already be insufficient to prevent misuse, making higher contribution limits inappropriate at this time.

For these reasons, we respectfully oppose increasing contribution limits for officeholder accounts to match temporary campaign limits. We do, however, support the proposed amendment prohibiting mailers funded by officeholder accounts within three months of a City election.

We appreciate the Oakland PEC's engagement on this matter and hope to see Democracy Dollars implemented in Oakland before 2029. If the temporary \$900 contribution limit for campaign accounts is extended to 2029, we respectfully request adding language to the ordinance specifying that the higher limit will sunset earlier if the City's Democracy Dollars program is implemented before 2029.

Thank you for your thoughtful consideration and for your continued leadership in safeguarding ethical standards in Oakland government.

Sincerely,

D. Azarmi

Money in Politics Manager

Common Cause California