

Judson Brown



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November 12, 2025

Honorable Mayor and Members of the City Council,

My name is Judson Brown and I serve as the Vice-Chair of the County of Orange Campaign Finance and Ethics Commission. I am also a resident of the City of Orange. I want to express my strong support for the First Reading of Ordinance No. 19-25, which amends Orange Municipal Code Sections 2.10.090 and 2.10.240. These amendments will restore critical protections against campaign contribution laundering that were weakened by a prior City Council action last year. Specifically, in May 2024 the Council adopted Ordinance No. 09-24, which removed the City's long-standing ban on transferring funds between candidate-controlled committees. This change undermined the integrity of our local campaign finance system by allowing candidates to funnel contributions through other committees, effectively enabling campaign contribution "laundering."

Ordinance No. 19-25 corrects this mistake by fully reinstating the prohibition on inter-candidate transfers and again barring any candidate-controlled or elected-officer-controlled committee from contributing to committees supporting or opposing other City candidates. These restored safeguards realign our local law with its original purpose, to prevent corruption or the appearance of corruption, and to prevent evasion of contribution limits through the funneling of donations, thereby preserving the integrity of our elections and maintaining public trust in our local government.

Additionally, I strongly support the ordinance's inclusion of a new safeguard in Section 2.10.240(C) that any future repeal or weakening of these protections must first be approved by City of Orange voters. This common-sense provision acknowledges the inherent conflict of interest in allowing Councilmembers to dilute campaign finance rules that govern their own elections, and it rightly places such decisions in the hands of the public.

While I serve as Vice-Chair of the County Campaign Finance and Ethics Commission, I am providing this public comment only as a resident of Orange, not on behalf of the Commission. In closing, I respectfully recommend the City Council to adopt Ordinance No. 19-25, and I offer my full support for its proposed amendments.

Thank you,

Judson Brown

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