



February 9, 2026

The Honorable Aaron R. Rouse, Chairman
Senate Committee on Privileges and Elections
Senate of Virginia

RE: Testimony in Support of Senate Bill 584

Chairman Rouse and Honorable Members of the Committee,

Campaign Legal Center (“CLC”) respectfully submits this statement in support of SB 584’s provisions to adopt campaign contribution limits for campaigns for elected office in Virginia.

CLC is a nonpartisan legal organization dedicated to solving the wide range of challenges facing American democracy. Since the organization’s founding in 2002, CLC has participated in every major campaign finance case before the U.S. Supreme Court, as well as in numerous other federal and state court cases. CLC fights for every American’s freedom to vote and participate meaningfully in the democratic process, particularly Americans who have faced political barriers because of race, ethnicity, or economic status.

As we continue to see record-breaking spending in American elections,¹ and specifically in Virginia elections,² contribution limits play a critical role in safeguarding our elections from corruption and the appearance of corruption flowing from large contributions made by wealthy special interests to candidates for elected office. Campaign finance laws must protect the integrity of our elections by ensuring

¹ By one estimate, spending exceeded \$16 billion in federal elections and \$4 billion in state elections in the 2024 election cycle. Albert Serna Jr. and Anna Massoglia, *Big money, big stakes: 5 things everyone should about money in 2024 elections*, OpenSecrets (Nov. 5, 2024), <https://www.opensecrets.org/news/2024/11/big-money-big-stakes-5-things-everyone-should-know-about-money-in-2024-election>.

² Ian Vandewalker, *Odd Year Elections Break Spending Records*, BRENNAN CTR. FOR JUST. (Dec. 1, 2025), <https://www.brennancenter.org/our-work/analysis-opinion/odd-year-elections-break-spending-records>. See also, Nathan Maxwell, *Record high fundraising in the Virginia House of Delegates races*, BALLOTPEDIA NEWS (Oct. 22, 2025), <https://news.ballotpedia.org/2025/10/22/record-high-fundraising-in-the-virginia-house-of-delegates-races/>.

both that contributions to candidates are subject to reasonable limits and that wealthy special interests cannot circumvent those limits to bankroll their preferred candidates.

Senate Bill 584 would help prevent corruption and the appearance of corruption by imposing reasonable limits on contributions to state-level candidates and political committees in Virginia.

I. SB 584 would close critical gaps in Virginia that allow wealthy special interests to contribute unlimited sums to candidates and thereby undermine democratic governance.

Contribution limits—for candidates and political committees that make contributions to candidates—are critical to safeguarding our elections from the corrupting potential of large contributions by wealthy special interests and the appearance of corruption from such contributions.

Virginia law currently imposes no limits on contributions to candidates or political committees. The absence of any contribution limits leaves Virginia as an extreme outlier among the states; forty-six other states already limit at least some contributions to candidates, and most also regulate contributions to other political committees.³ SB 584 would make Virginia more consistent with the vast majority of states by (1) limiting contributions to candidates from all sources, with specific limits delineated by the office sought for election and the specific source type; and (2) limiting contributions from any contributor to other political committees to \$10,000 per year.

Importantly, SB 584 limits both monetary and in-kind contributions to candidates. In-kind contributions are simply another way to financially support a candidate; there is no meaningful difference between a contributor writing a check to a candidate and, for example, paying a candidate's campaign manager's salary or the bill for a candidate's political advertising. Permitting candidates to accept large in-kind contributions presents the exact same risk of corruption and the appearance of corruption that contributions limits are designed to prevent. As introduced, though, SB 584 would implement reasonable limits on contributions to candidates and political committees, bringing Virginia in line with the majority of states.

In the context of contributions to political parties, contribution limits should account both for parties' unique role in elections and their potential to act as

³ See *State Limits on Contributions to Candidates*, NAT'L CONF. OF STATE LEGIS. (Last updated Oct. 6, 2025), <https://www.ncsl.org/elections-and-campaigns/state-limits-on-contributions-to-candidates>. Oregon recently enacted contribution limits as a part of a larger campaign finance reform package; contribution limits go into effect in Oregon in 2027. See *HB 4024 Implementation*, OR. SEC. OF STATE (last accessed Feb. 6, 2026), <https://sos.oregon.gov/elections/Pages/campaign-finance-legislation.aspx>.

aggregators of wealth to pass along to their chosen candidates. At the federal level and in several states, political parties are subject to contribution limits both for contributions to the parties and for contributions made by the parties to candidates.⁴ Such limits are typically higher than limits on individual contributions to candidates; however, allowing for unlimited contributions to political parties or unlimited contributions from political parties to candidates creates the risk that political parties would become vehicles for wealthy special interests to direct big money to their preferred candidates. Accordingly, contributions to political parties and from political parties to candidates should also be limited, and we recommend amending SB 584 to establish such limits.

II. Contribution limits are a constitutional cornerstone of campaign finance law.

Contribution limits are a cornerstone of modern campaign finance law at the federal, state, and local level across the country, and courts have routinely upheld reasonable contribution limits since *Buckley v. Valeo* was decided in 1976.⁵ In *Buckley*, the Supreme Court recognized the threat unlimited contributions pose to our democracy: “To the extent that large contributions are given to secure a political quid pro quo from current and potential office holders, the integrity of our system of representative democracy is undermined,” the Court wrote, acknowledging the potential for blatant bribery.⁶ Moreover, limits on contributions to political committees that make contributions to candidates are both a vital and constitutional policy to prevent circumvention of the limits on contributions to candidates.⁷

The Supreme Court has repeatedly explained that even the *appearance* of corruption can jeopardize the willingness of voters to take part in democratic governance. Avoiding the appearance of corruption is “[o]f almost equal concern as the danger of actual quid pro quo arrangements,” and “the avoidance of the appearance of improper influence ‘is also critical . . . if confidence in the system of representative Government is not to be eroded to a disastrous extent.’”⁸ Indeed, “[t]his interest exists even where there is no actual corruption, because the perception of corruption, or of opportunities for corruption, threatens the public’s faith in democracy.”⁹ Democracy works “only if the people have faith in those who govern, and that faith is bound to be shattered when high officials and their

⁴ See *Contribution limits for party committees*, FED. ELECT. COMM’N (last accessed Feb. 6, 2026), <https://www.fec.gov/help-candidates-and-committees/taking-receipts-political-party/contribution-limits-party-committees/>.

⁵ *Buckley*, 424 U.S. at 23-38. See, e.g., *Shrink Missouri*, 528 U.S. 377 (2000); *Lair v. Motl*, 873 F.3d 1170 (9th Cir. 2017).

⁶ *Id.* at 26-27.

⁷ *Cal. Med. Ass’n v. FEC*, 453 U.S. 182, 197-99 (1981).

⁸ *Buckley*, 424 U.S. at 27 (quoting *CSC v. Letter Carriers*, 413 U.S. 548, 565 (1973)).

⁹ *Ognibene v. Parkes*, 671 F.3d 174, 186 (2d Cir. 2011).

appointees engage in activities which arouse suspicions of malfeasance and corruption.”¹⁰ In essence, effective contribution limits strengthen democracy and faith in government among voters—even where no corruption exists—because even the appearance of corruption wrought by unlimited contributions erodes the peoples’ faith in the government.

III. Conclusion

Senate Bill 584 would, among other provisions, establish contribution limits for candidates and political committees in Virginia, serving the compelling government interest in preventing corruption and the appearance of corruption and strengthening public faith in democratic governance. CLC strongly supports the creation of contribution limits for candidates and political committees in Virginia. We welcome the opportunity to answer questions about this bill and work with Committee members to further strengthen this bill.

Respectfully submitted,

/s/ Elizabeth D. Shimek
Elizabeth D. Shimek
Senior Legal Counsel, Campaign Finance

Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005

¹⁰ *Shrink Missouri*, 528 U.S. at 390 (quoting *United States v. Mississippi Valley Generating Co.*, 364 U.S. 520, 562 (1961)).