

SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



ITEM: 2.26  
(ID # 28583)

**MEETING DATE:**  
Tuesday, August 26, 2025

**FROM :** COUNTY COUNSEL

**SUBJECT:** COUNTY COUNSEL: Approval of the Amended Conflict of Interest Code for Joint Powers Authority; Districts: 1, 5 [\$0]

**RECOMMENDED MOTION:** That the Board of Supervisors:

1. Approve the Amended Conflict of Interest Code of the Joint Powers Authority; and
2. Direct the Clerk of the Board to notify the Joint Powers Authority of the action taken.

**ACTION:** Consent

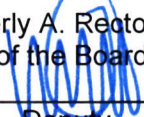
  
George Trindle, CHIEF ASST COUNTY COUNSEL 8/13/2025

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**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Gutierrez, seconded by Supervisor Medina and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Medina, Spiegel, Washington, Perez and Gutierrez  
Nays: None  
Absent: None  
Date: August 26, 2025  
xc: CO.CO., JPA, COB/AB

Kimberly A. Rector  
Clerk of the Board  
By:   
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA**

<b>FINANCIAL DATA</b>	<b>Current Fiscal Year:</b>	<b>Next Fiscal Year:</b>	<b>Total Cost:</b>	<b>Ongoing Cost</b>
<b>COST</b>	N/A	N/A	N/A	N/A
<b>NET COUNTY COST</b>	NA	N/A	N/A	N/A
<b>SOURCE OF FUNDS: N/A</b>			<b>Budget Adjustment:</b>	<b>N/A</b>
			<b>For Fiscal Year:</b>	<b>N/A</b>

**C.E.O. RECOMMENDATION:** [CEO use]

**BACKGROUND:**

**Summary**

The Political Reform Act prohibits a public official from using his or her position to influence a government decision in which he or she has a financial interest. Government Code section 87300 requires local government agencies to adopt and promulgate a Conflict of Interest Code identifying officials and employees required to file statements of economic interest based on the positions they hold. A local government agency, as defined by Government Code section 82041, includes the Joint Powers Authority.

Each even-numbered year, Government Code section 87306.5 requires local government agencies to review their Conflict of Interest Code, make appropriate revisions, if necessary, and submit an amended Conflict of Interest Code to the code reviewing body. Government Code section 82011(b) identifies the Board of Supervisors for the County of Riverside as the code reviewing body for a local government agency within its county.

The Joint Powers Authority recently amended its Conflict of Interest Code on August 14, 2024, to add new positions, revise titles of existing positions, revise disclosure categories and delete positions that participate in making governmental decisions. The Members of the Joint Powers Commission for the Joint Powers Authority have adopted Resolution No. 24-21, amending its Conflict of Interest Code. The Joint Powers Authority has submitted its amended Conflict of Interest Code for approval by the Board of Supervisors as the code reviewing body.

This office has reviewed the Conflict of Interest Code of the Joint Powers Authority and has found that it complies with statutory requirements. A complete copy of the Amended Conflict of Interest Code of the Joint Powers Authority is attached.

It is recommended that the Board of Supervisors approve the Amended Conflict of Interest Code of the Joint Powers Authority and direct the Clerk of the Board to notify the Joint Powers Authority of the action taken.

**Impact on Residents and Businesses**

N/A

**Additional Fiscal Information**

N/A

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,  
STATE OF CALIFORNIA

**Contract History and Price Reasonableness**

N/A

**ATTACHMENTS:**

**Attachment A:** Resolution No. 24-21

**Attachment B:** Conflict of Interest Code of the Joint Powers Authority

**RESOLUTION NO. JPA 24-21**

**RESOLUTION OF THE JOINT POWERS COMMISSION OF  
THE MARCH JOINT POWERS AUTHORITY ADOPTING  
AN AMENDED CONFLICT OF INTEREST CODE  
PURSUANT TO THE POLITICAL REFORM ACT OF 1974**

**WHEREAS**, the Legislature of the State of California enacted the Political Reform Act of 1974, Government Code Section 81000 et seq. (the “Act”), which contains provisions relating to conflicts of interest which potentially affect all officers, employees and consultants of the March Joint Powers Authority (the “Authority”), and requires all public agencies to adopt and promulgate a conflict of interest code; and

**WHEREAS**, the Members of the Joint Powers Commission (the “Commission”) adopted a Conflict of Interest Code (the “Code”) which was amended on August 10, 2022, in compliance with the Act; and

**WHEREAS**, subsequent changed circumstances within the Authority have made it advisable and necessary pursuant to Sections 87306 and 87307 of the Act to amend and update the Authority’s Code; and

**WHEREAS**, the potential penalties for violation of the provisions of the Act are substantial and may include criminal and civil liability, as well as equitable relief which could result in the Authority being restrained or prevented from acting in cases where the provisions of the Act may have been violated; and

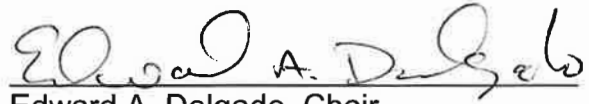
**WHEREAS**, notice of the time and place of a public meeting on, and of consideration by the Commission of the proposed amended Code was provided each affected designated employee and publicly posted for review at the offices of the Authority; and

**WHEREAS**, a public meeting was held upon the proposed amended Code at a regular meeting of the Commission on August 14, 2024, at which all present were given an opportunity to be heard on the proposed amended Code.

**NOW, THEREFORE, BE IT RESOLVED** by the Members of the Joint Powers Commission of the March Joint Powers Authority that the Commission does hereby adopt the proposed amended Conflict of Interest Code, a copy of which is attached hereto and shall be on file with the Executive Secretary and available for inspection to the public during regular business hours;

**BE IT FURTHER RESOLVED** that the said amended Conflict of Interest Code shall be submitted to the Board of Supervisors of the County of Riverside for approval and said Code shall become effective upon approval by the Board of Supervisors, as submitted.

**APPROVED AND ADOPTED** this 14<sup>th</sup> day of August, 2024.

A handwritten signature in black ink, appearing to read "Edward A. Delgado". The signature is written in a cursive style with a horizontal line underneath it.


Edward A. Delgado, Chair  
March Joint Powers Commission  
March Joint Powers Authority

**ATTEST:**

I, Cindy Camargo, Clerk of the March Joint Powers Commission, do hereby certify that the foregoing Resolution JPA 24-21 was duly and regularly adopted by the March Joint Powers Commission at its regularly scheduled meeting on August 14, 2024 by the following vote:

Ayes: Jeffries (2 votes), Cabrera, Rogers, Conder (2 votes), Vargas, Delgado  
Noes: None.  
Absent: Perry, Gutierrez  
Abstain: None.

Dated: August 14, 2024

  
Cindy Camargo, Clerk  
March Joint Powers Commission

**CONFLICT OF INTEREST CODE**  
**FOR THE**  
**MARCH JOINT POWERS**  
**AUTHORITY**

**CONFLICT OF INTEREST CODE FOR THE**  
**MARCH JOINT POWERS AUTHORITY**  
**(Amended August 14, 2024)**

The Political Reform Act (Gov. Code § 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code Regs. § 18730) which contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing it may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This incorporation page, regulation and the attached Appendix designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **March Joint Powers Authority** (the "**Authority**").

All officials and designated positions required to submit a statement of economic interests shall file their statements with the **Executive Assistant/Clerk** as the Authority's Filing Officer. The **Executive Assistant/Clerk** shall make and retain a copy of all statements filed by Members of the Joint Powers Commission and the Chief Executive Officer, and forward the originals of such statements to the Clerk of the Board of Supervisors of the County of Riverside. The **Executive Assistant/Clerk** shall retain the originals of the statements filed by all other officials and designated positions and make all statements available for public inspection and reproduction during regular business hours. (Gov. Code § 81008.)

# APPENDIX

## CONFLICT OF INTEREST CODE

### OF THE

## MARCH JOINT POWERS AUTHORITY

(Amended August 14, 2024)

### PART "A"

#### OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

Authority Officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3(b), are NOT subject to the Authority's Code but must file disclosure statements under Government Code Section 87200 et seq. [Regs. § 18730(b)(3)]

It has been determined that the positions listed below are officials who manage public investments<sup>1</sup>: These positions are listed here for informational purposes only.

Members of the Joint Powers Commission

Chief Executive Officer

Financial Consultants

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<sup>1</sup> Individuals holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by § 87200.

**DESIGNATED POSITIONS**  
**GOVERNED BY THE CONFLICT OF INTEREST CODE**

<b><u>DESIGNATED POSITIONS'</u></b> <b><u>TITLE OR FUNCTION</u></b>	<b><u>DISCLOSURE CATEGORIES</u></b> <b><u>ASSIGNED</u></b>
Accounting Manager/Controller	5
Business Development Specialist	5
Executive Assistant/Clerk	2, 4
General Counsel	1, 2
Government Affairs Officer	5, 6
Planning Director	1, 2
Principal Planner	1, 2
Property Manager	2, 5
Senior Planner	1, 2

**MEMBERS, BOARDS, COMMITTEES AND COMMISSIONS:**

Technical Advisory Committee	1, 2
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Consultant and New Positions<sup>2</sup>

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<sup>2</sup> Individuals serving as a consultant as defined in Regulation 18700.3 or in a new position created since this Code was last approved that make or participate in making decisions shall disclose pursuant to the broadest disclosure requirements set forth in this Code subject to the following limitation:

The Chief Executive Officer may determine that, due to the range of duties or contractual obligations, it is more appropriate to assign a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document. (Gov. Code Sec. 82019; FPPC Regs 18219 and 18734.) The Chief Executive Officer's determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code. (Gov. Code Sec. 81008.)

## **PART “B”** **DISCLOSURE CATEGORIES**

The disclosure categories listed below identify the types of economic interests that the Designated Position must disclose for each disclosure category to which the designated is assigned.<sup>3</sup> “Investment” means financial interest in any business entity (including a consulting business or other independent contracting business) and are reportable if they are either located in or doing business in the jurisdiction, are planning to do business in the jurisdiction, or have done business during the previous two years in the jurisdiction of the Authority.

Category 1: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are located in, that do business in or own real property within the jurisdiction of the Authority.

Category 2: All interests in real property which is located in whole or in part within, or not more than two (2) miles outside, the jurisdiction of the Authority, including any leasehold, beneficial or ownership interest or option to acquire property.

Category 3: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of Authority.

Category 4: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the Authority.

Category 5: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the Designated Position’s department, unit or division.

Category 6: All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, or income from a nonprofit or other organization, if the source is of the type to receive grants or other monies from or through the Authority or its subdivisions.

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<sup>3</sup> This Conflict of Interest Code does not require the reporting of gifts from outside this agency's jurisdiction if the source does not have some connection with or bearing upon the functions of the position. (Reg. 18730.1)

## **NOTICE OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE OF THE MARCH JOINT POWERS AUTHORITY**

NOTICE IS HEREBY GIVEN that the March Joint Powers Authority (the "Authority") intends to amend its Conflict of Interest Code (the "Code") pursuant to Government Code Section 87306.

The Appendix of the Code designates those employees, members, officers, and consultants who make or participate in the making of decisions and are subject to the disclosure requirements of the Authority's Code. The Authority's proposed amendment is to include new positions, revise disclosure categories, revise the titles of existing positions and delete titles of positions.

The proposed amended Code will be considered by the Members of the Commission on August 14, 2024, at 3:00 p.m. at March JPC Meeting Location, 14205 Meridian Parkway, Riverside, California. Any interested person may be present and comment at the public meeting or may submit written comments concerning the proposed amendment. Any comments or inquiries should be directed to the attention of Cindy Camargo, Executive Assistant/Clerk, March JPA, 14205 Meridian Parkway, Suite 140, Riverside, CA 92518; (951) 656-7000. Written comments must be submitted no later than 3:00 p.m. on August 14, 2024.

The proposed amended Code may be reviewed at, and copies obtained from, the office of the Executive Assistant/Clerk at March JPA, 14205 Meridian Parkway, Suite 140, Riverside, California, during regular business hours.

**MARCH JOINT POWERS COMMISSION**  
**OF THE**  
**MARCH JOINT POWERS AUTHORITY**

***MJPA Operations - Consent Calendar***  
***Agenda Item No. 8 (7)***

**Meeting Date:** August 14, 2024

**Action:** **ADOPT RESOLUTION JPA 24-21 ADOPTING AN AMENDED 2024 CONFLICT OF INTEREST CODE/ APPENDIX FOR THE MARCH JOINT POWERS AUTHORITY**

**Motion:** Approve Resolution JPA 24-21 adopting an amended 2024 Conflict of Interest Code/Appendix for the March Joint Powers Authority.

**Background:**

The March Joint Powers Authority's (March JPA) Conflict of Interest Code is reviewed periodically for updates and amendments as required by the Political Reform Act and the County of Riverside, which is the code-reviewing body for the March JPA. The last amended Conflict of Interest Code Appendix was adopted by the March Joint Powers Commission in August 2022. The current proposed amendments to the Code/Appendix will address changes to the March JPA staff filing designations, and new or abolished former positions.

The March JPA legal counsel drafted the proposed amendments to the Conflict-of-Interest Code/Appendix. Once approved by the Commission, the Conflict-of-Interest Code with Appendix will be submitted to the County of Riverside Board of Supervisors for approval of the amendment and will become effective 30 days after the Board of Supervisors approves the proposed amendment as submitted.

**Attachment(s):**

- 1) Resolution JPA 24-21  
Legislative Version of Proposed Conflict of Interest Code  
Amendment/Appendix  
Notice of Intention to Amend the Conflict of Interest Code of the March JPA.
- 2) Legislative (blueline) version of amended Code showing changes made.