

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



**ITEM: 2.8**  
(ID # 30552)

**MEETING DATE:**  
Tuesday, June 09, 2026

**FROM :** COUNTY COUNSEL

**SUBJECT:** COUNTY COUNSEL: Approval of an Amended Conflict of Interest Code for Sunline Transit Agency Conflict of Interest Code; District 4; [\$0]

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

1. Approve the Amendment to the Conflict of Interest Code of the Sunline Transit Agency;  
and
2. Direct the Clerk of the Board to notify the Sunline Transit Agency of the action taken.

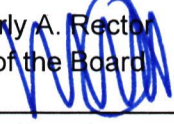
**ACTION:Consent**

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**MINUTES OF THE BOARD OF SUPERVISORS**

On motion of Supervisor Medina, seconded by Supervisor Perez 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: June 9, 2026  
xc: CO.CO., District, COB/AB/NS

Kimberly A. Rector  
Clerk of the Board  
By:   
Deputy

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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>	\$ N/A	\$ 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>	N/A

**C.E.O. RECOMMENDATION:** [Approve]

**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 Sunline Transit Agency.

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 Sunline Transit Agency recently amended its Conflict of Interest Code on March 25, 2026, to add titles or revise titles of existing positions that participate in making governmental decisions. The Board of Directors for Sunline Transit Agency has adopted Resolution No. 0818, amending its Conflict of Interest Code. The Sunline Transit Agency 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 Sunline Transit Agency and has found that it complies with statutory requirements. A complete copy of the Conflict of Interest Code of the Sunline Transit Agency is attached.

It is recommended that the Board of Supervisors approve the Conflict of Interest Code of the Sunline Transit Agency, and direct the Clerk of the Board to notify the Sunline Transit Agency of the action taken.

**Impact on Residents and Businesses**

N/A

**Additional Fiscal Information**

N/A

**Contract History and Price Reasonableness**

N/A

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STATE OF CALIFORNIA

ATTACHMENTS:

Attachment A: Resolution Number 0818

Attachment B: Conflict of Interest Code for the Sunline Transit Agency

  
Aaron Gettis, Chief Deputy County Counsel 5/22/2026

# SUNLINE TRANSIT AGENCY

## RESOLUTION NO. 0818

### RESOLUTION AMENDING SUNLINE TRANSIT AGENCY'S CONFLICT OF INTEREST CODE

**WHEREAS**, pursuant to Resolution No. 0782, dated September 23, 2020, SunLine Transit Agency ("SunLine") adopted a Conflict of Interest Code ("Code") as required by the Political Reform Act of 1974; and

**WHEREAS**, California Government Code Section 87306.5 requires SunLine to review its Code every even-numbered year and revise it if necessary; and

**WHEREAS**, legal counsel and staff have reviewed the current Code, last amended in 2024, and have determined the Code and its Appendices, listing the designated positions who must disclose their economic interests on an annual basis and disclosure categories for such positions, should be updated to reflect current staffing positions and organization; and

**WHEREAS**, legal counsel and staff recommend adopting the amendments as reflected in the attached Code.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Directors of SunLine Transit Agency hereby adopts the amended Conflict of Interest Code, in the form presented to the Board of Directors; and

**BE IT FURTHER RESOLVED** that the Clerk of the Board is directed to transmit a copy of the amended Conflict of Interest Code to the Riverside County Board of Supervisors for its review and approval, and to make any revisions that may be required by the County for approval of the Code.

**APPROVED AND ADOPTED** by the Board of Directors of SunLine Transit Agency on the 25th day of March, 2026.

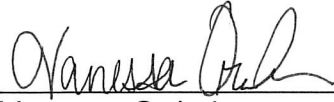
AYES: 10

NOES: 0

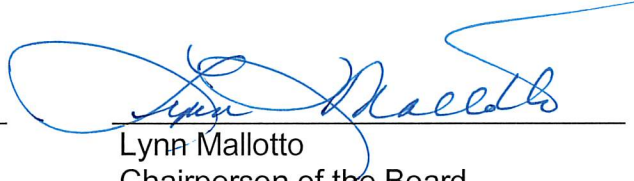
ABSENT: 0

ABSTAIN: 0

ATTEST:

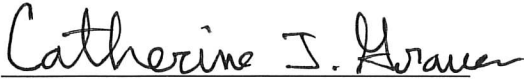


Vanessa Ordorica  
Clerk of the Board  
SunLine Transit Agency



Lynn Mallotto  
Chairperson of the Board  
SunLine Transit Agency

APPROVED AS TO FORM:



Catherine J. Groves  
General Counsel

## **SUNLINE TRANSIT AGENCY**

### **CONFLICT OF INTEREST CODE**

The Political Reform Act of 1974 (Gov. Code §§ 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission (FPPC) has adopted a regulation (2 Cal. Code of Regs. § 18730) that contains the terms of a standard conflict of interest code and can be incorporated by reference in an agency's code.

Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments duly adopted by the FPPC are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the Conflict of Interest Code of the SunLine Transit Agency (SunLine).

Individuals holding designated positions shall file their statements of economic interests with SunLine's Clerk of the Board, who will make the statements available for public inspection and reproduction (Gov. Code § 81008). SunLine will retain the statements.

Attachments: Appendices A and B

**APPENDIX A**  
**DESIGNATED POSITIONS**

The following designated employees make or participate in the making of decisions, which may have a material effect on a financial interest:

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Board and External Affairs Coordinator	5, 6
Chief, Capital Projects	1, 2, 3, 4, 5
Chief, Human Relations	5, 6
Chief, Maintenance Officer	1, 2, 3, 4, 5
Chief, Safety Officer	1, 3, 4, 5
Chief, Strategic Alignment	1, 2, 3, 4, 5
Chief, Transportation Officer	1, 2, 3, 4, 5
Clerk of the Board	1, 2, 3, 4, 5
Contracts Administrator	3, 4
Director, Board and External Affairs	1, 2, 3, 4, 5
Deputy Chief, Facilities Officer	6
Deputy Chief, Financial Officer	3, 5
Deputy Chief, Fueling and Infrastructure	6
Deputy Chief, General Services	3, 4
Deputy Chief, Maintenance Officer	6
Deputy Chief, Transit Operation	3, 4
Deputy Chief, Transit System and Technology	3, 4
General Counsel	1, 2, 3, 4, 5
Manager, Alternative Fuels	6
Manager, Customer Service	6
Manager, Data and Analytics	6
Manager, Financial Accounting and Reporting	6
Manager, Human Resources/EEOO	5, 6
Manager, Labor and Compliance	3, 5
Manager, Marketing and Events	4
Manager, Paratransit Operations	6
Manager, Risk	5, 6
Manager, Safety	5, 6
Planning Manager – Service Planning and Scheduling	4, 6
Planning Manager – Strategic Planning and Analytics	4, 6
Procurement Specialist	3, 4
Project Manager	6
Senior Project Manager	3, 4
Superintendent, Transportation	4, 6
Superintendent, Fleet Maintenance	6
Supervisor, Materials and Inventory	6
Supervisor, Senior Training	6
Consultants/New Positions	*

\*Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The CEO/General Manager may determine in writing that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant or new position’s duties, and based upon that description, a statement of the extent of disclosure requirements. The CEO/General Manager’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 § 81008).

### **Government Code Section 87200**

The following positions are NOT covered by this Conflict of Interest Code because they must electronically file their statements of economic interests with the Fair Political Practices Commission pursuant to Government Code Section 87200 and, therefore, are listed for informational purposes only:

- Members of the Board of Directors
- CEO/General Manager
- Chief Financial Officer
- Consultants involved in the investment of public funds

An individual 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 their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

**APPENDIX B**  
**DISCLOSURE CATEGORIES**

- Category 1: Interests in real property located within SunLine's jurisdiction and/or within a two-mile radius of any land owned or used by SunLine.
- Category 2: Investments, and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that engage in land development, construction or the acquisition or sale of real property.
- Category 3: Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that provide products, services, supplies, material, machinery, or equipment utilized by SunLine or in projects funded by SunLine. Such sources include, but are not limited to, buses, insurance and information technology, telecommunications, public utilities, consultants, transportation companies, and manufacturers.
- Category 4: Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that provide services in the marketing, advertising, transit, or environmental planning sectors.
- Category 5: Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources that have filed a claim against SunLine within the last two years or have a claim pending against SunLine.
- Category 6: Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources of the type that provide supplies, services, material, machinery, or equipment of the type utilized by the designated position's division.