

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



ITEM: 2.9
(ID # 30555)

MEETING DATE:
Tuesday, June 09, 2026

FROM : COUNTY COUNSEL

SUBJECT: COUNTY COUNSEL: Approval of the Conflict of Interest Code for Sunline Services Group Conflict of Interest Code; District 4; [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:


1. Approve the Conflict of Interest Code of the Sunline Services Group; and
2. Direct the Clerk of the Board to notify the Sunline Services Group of the action taken.

ACTION:Consent

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

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

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
NET COUNTY COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
SOURCE OF FUNDS: N/A			Budget Adjustment:	N/A
			For Fiscal Year:	N/A

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 Sunline Services Group.

Government Code sections 87300 and 87303 require newly created local government agencies to create and adopt a Conflict of Interest Code and submit a 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 Services Group adopted its Conflict of Interest Code on March 25, 2026. The Board of Directors for Sunline Services Group has adopted Resolution No. 0101, adopting its Conflict of Interest Code. The Sunline Services Group has submitted its 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 Services Group and has found that it complies with statutory requirements. A complete copy of the Conflict of Interest Code of the Sunline Services Group is attached.

It is recommended that the Board of Supervisors approve the Conflict of Interest Code of the Sunline Services Group, and direct the Clerk of the Board to notify the Sunline Services Group 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. 0101

Attachment B: Sunline Services Group Conflict of Interest Code



Aaron Gettis, Chief Deputy County Counsel 5/26/2026

SUNLINE SERVICES GROUP

RESOLUTION NO. 0101

RESOLUTION ADOPTING THE SUNLINE SERVICES GROUP'S CONFLICT OF INTEREST CODE

WHEREAS, the Political Reform Act of 1974 (Gov. Code §§ 81000 et seq.) requires every local agency to adopt and promulgate a conflict of interest code; and

WHEREAS, the Fair Political Practices Commission has adopted a regulation (2 Cal. Code Regs. § 18730) that contains the terms of a standard conflict of interest code and can be incorporated by reference in an agency's code; and

WHEREAS, the Political Reform Act further requires that local agencies review their conflict of interest codes in each even-numbered year and to amend the conflict of interest code if necessary due to changed circumstances or changes in the law; and

WHEREAS, SunLine Services Group ("SSG") is a local government agency required by Government Code Section 87300 to promulgate a conflict of interest code; and

WHEREAS, legal counsel and staff have prepared SSG's Conflict of Interest Code ("Code") and have determined that the Code and its Appendices list the designated positions which must disclose their economic interests on an annual basis and disclosure categories for such positions; and

WHEREAS, the SSG Board of Directors desires to adopt SSG's Code pursuant to this Resolution.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of SunLine Services Group hereby adopts the 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 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 Services Group on the 25th day of March, 2026.

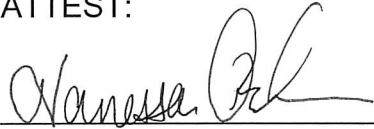
AYES: 10

NOES: 0

ABSENT: 0

ABSTAIN: \emptyset

ATTEST:

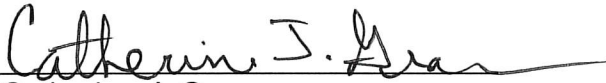


Vanessa Ordorica
Clerk of the Board
SunLine Services Group



Lynn-Mallotto
Chairperson of the Board
SunLine Services Group

APPROVED AS TO FORM:



Catherine J. Groves
General Counsel

SUNLINE SERVICES GROUP

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 Services Group (SSG).

Individuals holding designated positions shall file their statements of economic interests with SSG's Clerk of the Board, who will make the statements available for public inspection and reproduction (Gov. Code § 81008). SSG 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	2
Chief, Strategic Alignment	1, 2, 3
Clerk of the Board	1, 2, 3
Director of Board and External Affairs	1, 2, 3
General Counsel	1, 2, 3
Taxi Contracted Transportation Services Administrator	1, 2, 3
Taxi Regulatory Specialist	1, 2, 3
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 SSG's jurisdiction and/or within a two-mile radius of any land owned or used by SSG.

- Category 2: Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) from sources that are subject to SSG's regulatory, permit, or licensing authority.

- Category 3: 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 SSG within the last two years or have a claim pending against SSG.