



# City Council Memorandum

City of Arts & Innovation

**TO: HONORABLE MAYOR AND CITY COUNCIL      DATE: SEPTEMBER 17, 2024**  
**FROM: CITY CLERK      WARDS: ALL**  
**SUBJECT: BIENNIAL REVIEW OF CITY OF RIVERSIDE CONFLICT OF INTEREST CODES**

## **ISSUE:**

Direct the City Clerk and City Attorney to coordinate the biennial review of the City of Riverside Conflict of Interest Codes as required by State law.

## **RECOMMENDATIONS:**

That the City Council:

1. Consider proposed amendments to the City of Riverside Conflict of Interest Codes for:
  - a. Employees and officials including reclassifications, job title changes, and deleted or added designated filing positions as identified in Attachment 1.
  - b. Board and commission members adding the Commission of the Deaf as Disclosure Category 8 as reflected in Attachment 2; and
  - c. Successor Agency to the Redevelopment Agency of the City of Riverside including job title changes and deleted or added designated filing positions as reflected in Attachment 3;
2. Add a Conflict of Interest Code for the Housing Authority of the City of Riverside as reflected in Attachment 4; and
3. Approve the proposed amendments and direct staff to prepare corresponding Conflict of Interest Code resolutions for adoption within 90 days.

## **BACKGROUND/LEGISLATIVE HISTORY:**

The Political Reform Act prohibits public officials from using their official position to influence a governmental decision in which they have a financial interest. Every state and local agency must adopt a Conflict of Interest (COI) Code that identifies all officials and employees within the agency who make governmental decisions based on the positions they hold. The individuals in

the designated positions must disclose their financial interests as specified in the agency's Conflict of Interest Code.

Pursuant to Section 87306.5 of the California Government Code, the City Council, in its role as "Code Reviewing Body," must direct that the COI Codes be reviewed for employees and public officials, board and commission members, Housing Authority of the City of Riverside and the Successor Agency to the Redevelopment Agency of the City of Riverside. Amendments for consideration must be identified for review by the Code Reviewing Body by October 1, 2024.

Pursuant to Section 87303, within 90 days after receiving the proposed amendments or revisions, the City Council shall approve the proposed code amendments as submitted.

The Conflict of Interest Code for City employees and officials was last revised on December 6, 2022, by adoption of Resolution No. 23653. Amendments have been identified including reclassifications, job title changes, and deleted or added positions for adoption as reflected in Attachment 1.

The Conflict of Interest Code for board and commission members was last revised on December 6, 2022, by adoption of Resolution No. 23125. On February 7, 2023, Ordinance No. 7623 was adopted establishing the Commission of the Deaf. The Commission of the Deaf is being added to the Code with the members having no filing requirement under Disclosure Category 8, as shown in the Disclosure Category Definitions and as reflected in Attachment 2.

The Conflict of Interest Code for the Housing Authority of the City of Riverside will be added to include designated filers as reflected in Attachment 3.

The Conflict of Interest Code for the Successor Agency to the Redevelopment Agency of the City of Riverside employees and officials was last revised on December 6, 2022, by Resolution No. 23124. Amendments have been identified including job title changes and deleted or added positions to be considered for adoption as reflected in Attachment 4.

### **STRATEGIC PLAN ALIGNMENT:**

The Biennial Conflict of Interest Code Review contributes to Strategic Priority No. 5 - *High Performing Government* and Goal No. 3 Enhance communication and collaboration with community members to improve transparency, build public trust, and encourage shared decision-making.

The City's Conflict of Interest Code aligns with three of the five Cross-Cutting Threads as follows:

1. **Community Trust** - Amendments to the COI Codes enhances transparency by sharing reportable investments, business positions, interests of real property, or sources of income that may foreseeably be affected by designated employees' position as conflict with City.
2. **Equity** - All City positions subject to the COI Codes are reviewed biennially to ensure that all individuals making financial decisions on behalf of the City are included.
3. **Fiscal Responsibility** - The COI Codes is reviewed biennially to ensure all public officials, employees, and consultants, who make or participate in making governmental decision that could cause a conflict of interest to City as required by the Political Reform Act.

4. **Innovation** - This item is neutral towards this cross-cutting thread.

5. **Sustainability & Resiliency** - This item is neutral towards this cross-cutting thread.

**FISCAL IMPACT:**

The cost of staff time for review and drafting of amendments will be absorbed within the adopted Department Budget.

Prepared by: Donesia Gause, City Clerk

Certified as to

Approved as to form: Phaedra A. Norton, City Attorney

Attachments:

1. Conflict of Interest designated positions for City employees and officials - Appendix A - Redlined
2. Conflict of Interest designated positions for boards and commissions - Appendix A - Redlined
3. Conflict of Interest designated positions for Successor Agency to the Redevelopment Agency - Appendix A - Redlined
4. Conflict of Interest designated positions for Housing Authority of the City of Riverside - Appendix A - Redlined
5. Disclosure Category Definitions
6. Presentation