

To: City Clerk, Board of Ethics

From: Councilmember Steven Robillard

Date: 10.17.25

Re: Response to Ethics Complaint

I. Introduction

I respectfully submit this response to the ethics complaint filed against me. I categorically deny the allegations and will demonstrate that the complaint rests on incorrect facts, misapplied legal standards, and speculation rather than evidence.

II. Misstatement of Attendance at the March 13, 2025 Chamber Event

The complaint and supporting declaration claim that four councilmembers — Mill, Robillard, Conder, and Perry — attended the Chamber of Commerce breakfast on March 13, 2025. This is incorrect. Councilmember Perry was not present at the event.

- The Riverside City Council consists of seven members. A quorum requires four.
- Only three councilmembers were present at the Chamber event.
- Without a quorum, the Ralph M. Brown Act (Gov. Code § 54952.2(a)) was not triggered.

This single factual error undercuts the complaint's central allegation: that a Brown Act violation occurred by virtue of a quorum gathering at a non-publicized event. Since no quorum existed, no "meeting" occurred under the law.

III. No Violation of Riverside Municipal Code Section 2.78.060

The complaint fails to identify which specific subsection of RMC 2.78.060 I allegedly violated. Regardless, none of the prohibited acts apply:

- I did not use my office for personal gain.
- I did not disclose confidential information.
- I did not coerce staff or engage in prohibited political activity.
- I did not negotiate for employment, endorse for compensation, or knowingly assist another official in an ethics violation.

Without specificity, the complaint does not meet the standard for alleging an ethics violation.

IV. Sequential Meetings Allegations

The complaint further suggests that staff engaged in "sequential meetings" with councilmembers prior to the January 7, 2025 cannabis ordinance hearing.

- Routine Briefings Permitted: The Brown Act expressly allows staff to brief councilmembers individually (Gov. Code § 54952.2(b)).
- No Evidence of Serial Deliberation: The complaint offers no evidence that staff acted as intermediaries to form a collective decision outside of public view. Speculation does not establish a violation.

V. Alleged Outside Communications

The complaint references emails between staff and outside cannabis stakeholders. I must be clear:

- I did not participate in or direct any off-channel communications with cannabis applicants or their representatives.
- I never instructed staff to alter, withhold, or conceal emails.
- Any alleged conduct involving third parties is not attributable to me and is unsupported by evidence.

VI. Assistance in Alleged Violations

The complaint asserts that I “knowingly assisted” other councilmembers in violating ethics rules. This is entirely without merit. Simply attending a civic event does not constitute assisting another official in misconduct. There is no evidence that I encouraged, facilitated, or enabled any violation.

VII. Conclusion

This complaint is fatally flawed:

1. It rests on the false claim that four councilmembers attended the March 13 Chamber breakfast. In truth, only three were present, eliminating any possibility of a Brown Act violation.
2. It fails to identify or substantiate any violation of the Riverside Municipal Code’s Code of Ethics and Conduct.
3. It relies on speculation, conjecture, and unrelated allegations rather than evidence.

For these reasons, I respectfully request that the complaint be dismissed in its entirety.

Respectfully submitted,

A handwritten signature in dark ink, reading "Steven Robillard". The signature is fluid and cursive, with the first name "Steven" and last name "Robillard" clearly legible.

Steven Robillard

Councilmember, Ward 3

City of Riverside