



City of Arts & Innovation

Board of Ethics Memorandum

TO: BOARD OF ETHICS HEARING PANEL **DATE: NOVEMBER 6, 2025**

FROM: CITY ATTORNEY'S OFFICE **WARDS: ALL**

**SUBJECT: HEARING ON THE CODE OF ETHICS AND CONDUCT COMPLAINT
SUBMITTED BY DANA CISNEROS, ESQ. ON BEHALF OF PACKS RIVERSIDE,
LLC, AND OTC RIVERSIDE, LLC, REGARDING CITY COUNCILMEMBER
ROBILLARD**

ISSUE:

Conduct a Hearing on the Code of Ethics and Conduct complaint by Dana Cisneros, Esq., on behalf of Packs Riverside, LLC and OTC Riverside, LLC regarding Councilmember Robillard submitted on August 11, 2025, and deemed complete and filed on August 18, 2025.

RECOMMENDATION:

That the Board of Ethics conduct a Hearing as required by Riverside Municipal Code (RMC) Section 2.78.080 for the Code of Ethics and Conduct complaint by Dana Cisneros Esq. on behalf of Packs Riverside, LLC and OTC Riverside, LLC, regarding Councilmember Robillard submitted on August 11, 2025, and deemed complete and filed on August 18, 2025.

DISCUSSION:

On August 11, 2025, Dana Cisneros Esq. submitted a Code of Ethics and Conduct complaint on behalf of TAT RV, LLC, Packs Riverside, LLC and OTC Riverside, LLC, against Councilmember Robillard, which was deemed complete and filed on August 18, 2025, alleging violations of (1) RMC Section 2.78.060(I) *Knowingly assisting another public official in violating this Code of Ethics and Conduct prohibited*; and (2) Section 2.78.060(K) *Ex Parte Contact in Quasi-Judicial Matters Prohibited*.

At the September 4, 2025, meeting, the Board found that (1) the complaint procedures were followed; (2) TAT RV, LLC should be removed from the complaint; and (3) the evidence provided by the complainant did show that it is more likely than not that there may be a potential violation of the Riverside Municipal Code Section 2.78.060(I) and Section 2.78.060(K).

The Board of Ethics set a time limit of 30 minutes for each party to present their case at the hearing.

FISCAL IMPACT:

There is no fiscal impact associated with this report.

Prepared by: Rahman Gerren, Senior Deputy City Attorney

Approved as to form: Rebecca McKee-Reimbold, Interim City Attorney

Attachments:

1. Complaint by Dana Cisneros Esq.
2. Councilmember Robillard's Response
3. Government Code Section 54952.2
4. City Council Meeting Rules
5. BOE Hearing Rules
6. RMC 2.78.080 Hearing Procedures