

Staff Report

TO: Honorable Mayor and Members of the Town Council
FROM: Wes Heathcock, Town Manager
Frank Splendorio, Town Attorney
DATE: September 9, 2025
RE: Town's Response Letter to Placer County Civil Grand Jury 2024-25 Report

Recommendation

Approve and authorize the Mayor to execute the Town Council's response letter to the Placer County Civil Grand Jury's 2024-25 Final Report.

Issue Statement and Discussion

On July 1, 2025, the Placer County Civil Grand Jury issued its 2024-25 its final report entitled "Conflict of Interest Code, Form 700, Ethics Training Compliance".

Pursuant to state law, governing bodies of public agencies must respond within 90 days to the identified findings and recommendations in each report. Staff request the Council review and approve the Town's responses to the above-mentioned report and authorize the Mayor to sign on behalf of the Council.

In summary, the findings and recommendations almost uniformly applied to all the municipalities in the County. The Grand Jury recommended the Town maintain Form 700 recordkeeping in a certain way and amend their conflict-of-interest codes to specify certain requirements and information, even though no such amendments are legally required. While not necessarily required, the Town's proposes responses are still aimed at showing it will reasonably implement what it can, to the extent they are feasible or supported by state law. The proposed responses are consistent with the overall approach and tenor of the other cities responses yet modified based upon the Town's availability of limited resources. In general, the Town's responses hopefully strike a right balance in addressing the Grand Jury's findings.

Upon approval, the original executed response will be transmitted to both the Presiding Judge of the Placer County Superior Court and to the Placer County Grand Jury.

CEQA Requirements

There are no CEQA implications associated with the recommended action.

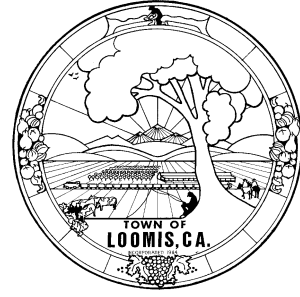
Financial and/or Policy Implications

There is no fiscal impact associated with this item.

Attachments

- A. Town's Response Letter

TOWN OF LOOMIS



9/9/2025

The Honorable Alan V. Pineschi
Presiding Judge
Placer County
P.O. Box 619072
Roseville, CA 95661

The Honorable Trisha Hirashima
Advising Grand Jury Judge
Superior Court County of Placer
P.O. Box 649072
Roseville, CA 95661

Bob Peterson
Foreperson
2024 – 2025 Placer County Grand Jury
11532 B Avenue
Auburn, CA 95603

RE: Response to the Placer County Grand Jury Final Report 2024/25

Dear Honorable Judge Pineschi, Honorable Judge Hirashima, and Placer County Grand Jury:

The Town of Loomis has reviewed the Placer County Grand Jury Final Report 2024/25 released on June 30, 2025. The Town is providing the following responses pursuant to California Penal Code section 933.05, subdivision (a) and (b):

Placer County Grand Jury Finding No. 8:

Auburn, Colfax, Lincoln, Loomis, and Rocklin do not include Assembly Bill 1234 Ethics Training requirements in their conflict-of-interest codes.

Town of Loomis' Response to Grand Jury Finding No. 8:

The Town agrees that its conflict-of-interest code ("Code") does not include AB 1234 language, but it cannot concur to the extent that such finding presumes it is required to be included in the Code. The three required components of a Code are as follows:

1. Incorporation Section (Terms of the Code) - This section designates where the Form 700s are filed and retained (i.e., the agency or the FPPC). This section also must reference Regulation 18730, which provides the rules for disqualification procedures, reporting financial interests, and references the current gift limit. A sample is available.

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2. List of Designated Positions - The code must list all agency positions that involve the making or participation in making of decisions that “may foreseeably have a material effect on any financial interest.” This covers agency members, officers and employees, and it may include volunteers on a committee if the members make or participate in making government decisions.
3. Detailed Disclosure Categories - A disclosure category is a description of the types of financial interests’ officials in one or more job classifications must disclose on their Form 700s. The categories must be tailored to the financial interests affected and must not require public officials to disclose private financial information that does not relate to their public employment.

Placer County Grand Jury Finding No. 10:

Auburn, Colfax, Lincoln, Loomis, and Rocklin do not include enforcement authority in their conflict of interest codes, leaving no defined consequences if a designated individual fails to timely file Form 700 or complete Assembly Bill 1234 Ethics Training.

Town of Loomis’ Response to Grand Jury Finding No. 10:

The Town agrees that its Code does not include any “enforcement authority” language, but it cannot concur to the extent that such finding is presumed to be required to be included in the Code. The three required components of a Code are as follows:

1. Incorporation Section (Terms of the Code) - This section designates where the Form 700s are filed and retained (i.e., the agency or the FPPC). This section also must reference Regulation 18730, which provides the rules for disqualification procedures, reporting financial interests, and references the current gift limit. A sample is available.
2. List of Designated Positions - The code must list all agency positions that involve the making or participation in making of decisions that “may foreseeably have a material effect on any financial interest.” This covers agency members, officers and employees, and it may include volunteers on a committee if the members make or participate in making government decisions.
3. Detailed Disclosure Categories - A disclosure category is a description of the types of financial interests officials in one or more job classifications must disclose on their Form 700s. The categories must be tailored to the financial interests affected, and must not require public officials to disclose private financial information that does not relate to their public employment.

The Town also cannot concur to the extent that there is assumed to be left “no defined consequences” if a designated individual fails to file the Form 700 or fails to complete the AB 1234 training. The Town Clerk, as the filing officer for the Town has certain rights and duties under state law, and moreover, all designated-filer employees are under the Town Manager’s oversight.

Placer County Grand Jury Finding No. 12:

For Colfax, Lincoln and Loomis, incomplete information in recordkeeping for designated Form 700 filers prevented the grand jury from accurately assessing the timeliness of the filings.

Town of Loomis’ Response to Grand Jury Finding No. 12:

The Town cannot concur that there was “incomplete information” in the Form 700 logs, as they are accurate as to what the FPPC requires.

Placer County Grand Jury Finding No. 17:

All local agencies' recordkeeping was difficult to review and often failed to contain necessary information.

Town of Loomis' Response to Grand Jury Finding No. 17:

The Town's AB 1234 recordkeeping was legally compliant and therefore it cannot concur that it failed to contain "necessary" information.

Placer County Grand Jury Finding No. 18:

A lack of enforcement authority within all local agencies led to failures to receive timely ethics training.

Town of Loomis' Response to Grand Jury Finding No. 18:

To the extent there was untimely ethics training the Town cannot occur at this time that it was caused by any "lack of enforcement authority" — given the robust enforcement mechanisms already available.

Placer County Grand Jury Recommendation No. 1:

Auburn, Colfax, Lincoln, Loomis, and Rocklin review, amend, and/or adopt their conflict of interest code to specify those positions who shall receive Assembly Bill 1234 Ethics Training pursuant to Government Code section 53234-53235.2 by October 1, 2025.

Town of Loomis' Response to Grand Jury Recommendation No. 1:

The Town will implement this recommendation, in keeping with its current practice to regularly review and update its Code. Pursuant to such review, it will make any necessary amendments pursuant to the time allotted for such amendments under state law.

Placer County Grand Jury Recommendation No. 2:

Auburn, Colfax, Lincoln, Loomis, and Rocklin review, amend, and/or adopt their conflict of interest code to specify the city clerk is the responsible official to administer the Assembly Bill 1234 Ethics Training program, and function as the recordkeeper for ethics training records by October 1, 2025.

Town of Loomis' Response to Grand Jury Recommendation No. 2:

The Town will implement this recommendation, in keeping with its current practice to regularly review and update its Code. Pursuant to such review, it will make any necessary amendments pursuant to the time allotted for such amendments under state law.

Placer County Grand Jury Recommendation No. 3:

Auburn, Colfax, Lincoln, Loomis, Rocklin, and Roseville should specify in their conflict of interest code actionable enforcement authority against individuals who fail to timely file Form 700 and/or fail to timely receive Assembly Bill 1234 Ethics Training by October 1, 2025.

Town of Loomis' Response to Grand Jury Recommendation No. 3:

The Town does not believe the recommendation is warranted. First, such language is not required under state law. Second, the FPPC already regulates and provides robust and broad enforcement over the Form 700 filing and AB 1234 training requirements. In addition, the filing officer for the Town has the ability to provide referrals to the FPPC as necessary. Finally, the Town Manager, consistent with the Town's Council-Manager form of governance, has oversight over all affected employees.

Placer County Grand Jury Recommendation No. 4:

Colfax, Lincoln, Loomis, and Roseville should create and maintain an annual database for all designated Form 700 filers in alignment with the FPPC filing year by December 31, 2025. The Placer County Grand Jury recommends the database include: the name of each Form 700 filer, the date of hire or initial service, the type of filing (assuming, annual, leaving), the deadline for filing, the date the form was filed, and whether the filing was timely.

Town of Loomis' Response to Grand Jury Recommendation No. 4:

The recommendation will be implemented to the extent it will include the date of hire or initial service.

Placer County Grand Jury Recommendation No. 5:

Auburn, Colfax, Lincoln, Loomis, and Rocklin should create and maintain a database of all individuals required to receive Assembly Bill 1234 Ethics Training by December 31, 2025. The Placer County Grand Jury recommends the database include: the name of each individual required to receive ethics training, the date of hire or the date the position was assumed which required ethics training, the deadline for receiving ethics training (one year/two years), the date ethics training was received, and whether ethics training was timely. The training records should be maintained for five years.

Town of Loomis' Response to Grand Jury Recommendation No. 5:

The recommendation will be implemented to the extent it will include the date of hire or initial service.

Placer County Grand Jury Recommendation No. 6:

Auburn, Colfax, Lincoln, Loomis, Rocklin, and Roseville should create a plan to increase oversight with a goal to achieve 100% timely Form 700 filings and ethics training, by November 1, 2025.

Town of Loomis' Response to Grand Jury Recommendation No. 6:

The Town plans to implement this recommendation through its implementation of some of the other recommendations, as noted above, including date of hire/service.

The Town of Loomis appreciates the Grand Jury's interest in the Town's administration, as well as the opportunity to respond to the findings and recommendations above.

Sincerely,

David Ring, Mayor
Town of Loomis