

Written materials relating to an item on this agenda that are distributed to the legislative bodies within 72 hours before the item is to be considered at its regularly scheduled meeting will be made available for public inspection at the City Clerk's Office, 300 West Third Street 4th Floor and at the Oxnard main library, 251 South A Street during customary business hours. Agenda reports are also on the City of Oxnard web site at [www.oxnard.gov](http://www.oxnard.gov).



AGENDA  
OXNARD CITY COUNCIL  
FINANCE AND GOVERNANCE COMMITTEE  
Council Chambers, 305 West Third Street  
January 27, 2026  
**Regular Meeting - 5:00 to 6:30 PM**

Zoom details to call-in for public comment during a meeting:

1. Dial Phone Number: (888) 475-4499
2. Enter Meeting ID: 890 9584 4541
3. Passcode: 922121

If you wish to speak during public comments or a particular item on the agenda, please sign-on by following the zoom call-in steps listed above. Once the presiding officer calls for public speakers, press \*9 to raise your hand to inform the City Clerk you would like to speak during the public speaking section for that particular item on the agenda, while in the zoom waiting room. Press \*6 when asked to unmute. Listen to the instructions provided virtually on the phone while on hold in the zoom waiting room. Please note that there is a slight time delay when viewing the meeting via television.

IN ACCORDANCE WITH ASSEMBLY BILL 2449, MEMBERS OF THE LEGISLATIVE BODY MAY MEET IN-PERSON OR REMOTELY. TO PARTICIPATE REMOTELY VISIT [WWW.OXNARD.ORG](http://WWW.OXNARD.ORG).

To find out how you may provide public comment, please refer to the instructions below or at [www.https://www.oxnard.org/city-meetings/](https://www.oxnard.org/city-meetings/).

The public may view the meeting from home on Spectrum channel 10, Frontier channel 35, or YouTube at [Youtube.com/oxnardnews](http://Youtube.com/oxnardnews). Video recordings of the meeting are typically available online following the meeting at the City's website at [www.oxnard.org/city-meetings](http://www.oxnard.org/city-meetings).

\*Please see the link for the Measure M pre-recorded presentation video for each item listed on this agenda.

YOU MAY PARTICIPATE IN THE MEETING IN THE FOLLOWING WAYS:

1. ATTEND THE MEETING AT THE LOCATION LISTED ABOVE: Submit a speaker card to the City Clerk.
2. EMAIL COMMENTS OR SIGN UP TO SPEAK REMOTELY BEFORE THE MEETING
  - a. Submit a request to speak remotely by 3 p.m. on the day of the meeting by using the form available at [www.oxnard.org/citymeetings](http://www.oxnard.org/citymeetings).
  - b. Submit an email to [cityclerk@oxnard.org](mailto:cityclerk@oxnard.org) by 3 p.m. on the day of the meeting (indicate the agenda item number in the subject line). All email correspondence will be forwarded to the legislative body prior to the start of the meeting and made part of the legislative record.
  - c. Contact the City Clerk's Office at (805) 385-7803 to submit your request.
3. PROVIDING PUBLIC COMMENTS REMOTELY DURING THE MEETING
  - a. Follow Zoom details listed above.

In compliance with the Americans with Disabilities Act, if you require special assistance to participate in a meeting, please contact the City Clerk's Office at 385-7803. Notice at least 72 hours prior to the meeting will enable the City to reasonably arrange for your accessibility to the meeting.

Agenda Item Time Estimates include: (Minutes for Presentation + Council Discussion + Public Comment)

- b. Public comments on agenda items will be taken following the announcement of the item. After the item is announced, members of the public may register or otherwise be recognized for the purpose of providing public comment.

Please review the Zoom instructions on the registration page to help ensure there are no technical difficulties during your comments and help you understand public comment procedures using Zoom. Detailed participation instructions can be found at [www.oxnard.org/city-meetings](http://www.oxnard.org/city-meetings).

In the event of a disruption which prevents a legislative body of the City of Oxnard from broadcasting a meeting using a call-in option or internet-based service option, or in the event of a disruption within the City's control which prevents members of the public from offering public comment using the call-in option or internet-based service option, the legislative body shall take no further action on items appearing on a meeting agenda until public access to the meeting via the call-in option or internet-based service option is restored. However, if any of the broadcast options are disrupted, but any of the other broadcast options is still available to the public, the legislative body may take further action on items appearing on a meeting agenda without waiting for the disrupted broadcast option(s) to be restored.

A. ROLL CALL, POSTING OF AGENDA, FLAG SALUTE

Consideration of Teleconference Participation pursuant to Assembly Bill 2449.

B. PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA AND NON-ACTION ITEMS

A person may address the legislative body only on matters not appearing on the agenda and within the subject matter jurisdiction of the legislative body, and on non-action items. Speaker requests shall be submitted as set forth on the first page of this agenda. Speakers are limited to three minutes. After 30 minutes, if all speakers have not had the opportunity to speak, the remaining speakers will be given an opportunity to speak prior to adjournment of the meeting. The legislative body cannot enter into a detailed discussion or take action on any items presented during public comments at this time. Such items may only be referred to the City Manager for administrative action or scheduled on a subsequent agenda for discussion.

C. CONSENT AGENDA

1. City Clerk Department

SUBJECT: Approval of Minutes.

RECOMMENDATION: That the Finance and Governance Committee approve the regular meeting minutes for November 25 and December 9, 2025 and January 13, 2026.

Contact: Luly Lopez, (805) 385-7805

D. REPORTS

1. City Manager Department

SUBJECT: Update on Whistleblower Policy and Biannual Update.

RECOMMENDATION: That the Finance and Governance Committee:

1. Recommend City Council approve an update to the City's Whistleblower Policy to reflect current legislation; and
2. Receive and file an update on the City's whistleblower hotline.

Please click the following link to view the required Measure M pre-recorded presentation video: <https://youtu.be/8mclv3CuEZ8>

Contact: Eric Sonstegard, (805) 385-7478

E. ITEMS FOR FUTURE AGENDAS

F. ADJOURNMENT



**FINANCE AND GOVERNANCE COMMITTEE  
AGENDA REPORT**

**CONSENT AGENDA**

**AGENDA ITEM NO. C.1**

**DATE:** January 27, 2026  
**TO:** Finance & Governance Committee  
**FROM:** Luly Lopez, City Clerk, (805) 385-7805, luly.lopez@oxnard.org  
**SUBJECT:** Approval of Minutes.

**RECOMMENDATION**

That the Finance and Governance Committee approve the regular meeting minutes for November 25 and December 9, 2025 and January 13, 2026.

**BACKGROUND**

Approval of minutes.

**STRATEGIC PRIORITIES**

This agenda item is a routine operational item or does not relate to the five strategic priorities adopted by City Council on March 16, 2021.

**FINANCIAL IMPACT**

There is no financial impact.

*Prepared by: Luly Lopez, City Clerk*

**ATTACHMENTS**

1. Minutes of Finance and Governance Committee for November 25 2025
2. Minutes of Finance and Governance Committee for December 9, 2025
3. Minutes of Finance and Governance Committee for Jan 13 2026

**MINUTES**  
OXNARD CITY COUNCIL  
FINANCE AND GOVERNANCE COMMITTEE  
Regular Meeting  
November 25, 2025

Because there were no items requiring consideration on this date, there was no regular meeting.

\_\_\_\_\_  
LOURDES A. LÓPEZ  
City Clerk

\_\_\_\_\_  
LUIS A. MC ARTHUR  
Chair

**MINUTES**  
OXNARD CITY COUNCIL  
FINANCE AND GOVERNANCE COMMITTEE  
Regular Meeting  
December 9, 2025

A. ROLL CALL, POSTING OF AGENDA, FLAG SALUTE

At 5:01 p.m., Committee Member Gabriela Rodriguez called to order the regular meeting of the Oxnard City Council Finance and Governance Committee in the City Hall Council Chambers at 305 West Third Street, Oxnard, California. Committee Members Gabriela Rodriguez and Aaron Starr were present. Chair Luis A. Mc Arthur was absent. The City Clerk stated that the agenda was posted on Tuesday, December 2, 2025 at the Library, City Hall kiosk, City Administrative Offices and on the website. Saluted the flag.

Staff members present were Eric Sonstegard, Assistant City Manager; Stephen Fischer, City Attorney; Javier Chagoyen-Lázaro, Chief Financial Officer; Beth Vo, Assistant Chief Financial Officer; Michael Wolfe, Public Works Director and Lourdes A. López, City Clerk.

*It was moved by Member Starr, seconded by Member Rodriguez, to appoint Gabriela Rodriguez as Chair Pro Tem in the absence of Chair Mc Arthur. VOTE: Starr and Rodriguez voted in favor. The motion carried 2-0. Chair Mc Arthur was absent.*

Consideration of Teleconference Participation pursuant to Assembly Bill 2449.

B. PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA AND NON-ACTION ITEMS

No public comments were received.

C. CONSENT AGENDA

1. City Clerk Department

SUBJECT: Approval of Minutes.

RECOMMENDATION: That the Finance and Governance Committee approve the minutes of the October 28 and November 25, 2025, regular meetings as presented.

No public comments were received.

*It was moved by Member Starr, seconded by Chair Pro Tem Rodriguez, to approve the Information/Consent item as presented. VOTE: Starr and Rodriguez voted in favor. The motion carried 2-0. Chair Mc Arthur was absent.*

D. REPORTS

1. Finance Department

SUBJECT: Update on Financial Corrective Action Plan (FCAP).

RECOMMENDATION: That the Finance and Governance Committee receive an update on the Financial Corrective Action Plan (FCAP) for closing past audit findings and recommend staff forward the presentation to City Council.

No public comments were received.

*It was moved by Member Starr, seconded by Chair Pro Tem Rodriguez, to approve the recommended action as presented. VOTE: Starr and Rodriguez voted in favor. The motion carried 2-0. Chair Mc Arthur was absent.*

2. Finance Department

SUBJECT: Annual Developer Fee Report (AB1600).

RECOMMENDATION: That the Finance and Governance Committee recommend that the City Council receive and file the AB1600 Annual Report for Development Impact and In-Lieu Fees for the fiscal year ending June 30, 2025.

(Presentation will be live upon consultant's request).

The Chief Financial Officer presented the AB 1600 report, an annual financial document required by the Mitigation Fee Act for local governments. This report details the collection and expenditures of development impact fees, providing transparency and accountability to ensure the funds collected from new development projects are appropriately used for necessary public facilities and infrastructure.

Megan Quinn with Harrison and Associates summarized the findings and noted that while the report is an annual requirement, a comprehensive review must be filed every five years. She was available to address the Committee's questions. No public comments were received. Discussion ensued among the Committee and staff.

*It was moved by Member Starr, seconded by Chair Pro Tem Rodriguez, to approve the recommended action as presented. VOTE: Starr and Rodriguez voted in favor. The motion carried 2-0. Chair Mc Arthur was absent.*

E. ITEMS FOR FUTURE AGENDAS

Member Starr stated that he has received complaints regarding compliance with the California Public Records Act (CPRA). He proposed holding a workshop to discuss potential service improvements for fulfilling CPRA requests.

F. ADJOURNMENT

There being no further business on the agenda, and without objection, Chair Pro Tem Rodriguez adjourned the meeting at 5:45 p.m.

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LOURDES A. LÓPEZ  
City Clerk

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GABRIELA RODRIGUEZ  
Chair Pro Tem

MINUTES  
OXNARD CITY COUNCIL  
FINANCE AND GOVERNANCE COMMITTEE  
Regular Meeting  
January 13, 2026

Because there were no items requiring consideration on this date, there was no regular meeting.

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LOURDES A. LÓPEZ  
City Clerk

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LUIS A. MC ARTHUR  
Chair



**FINANCE AND GOVERNANCE COMMITTEE  
AGENDA REPORT**

**REPORTS**

**AGENDA ITEM NO. D.1**

**DATE:** January 27, 2026  
**TO:** Finance & Governance Committee  
**FROM:** Eric Sonstegard, Assistant City Manager, (805) 385-7478, eric.sonstegard@oxnard.org  
**SUBJECT:** Update on Whistleblower Policy and Biannual Update.

**RECOMMENDATION**

That the Finance and Governance Committee:

1. Recommend City Council approve an update to the City’s Whistleblower Policy to reflect current legislation; and
2. Receive and file an update on the City’s whistleblower hotline.

Please click the following link to view the required Measure M pre-recorded presentation video: <https://youtu.be/8mclv3CuEZ8>

**BACKGROUND**

Whistleblower Policy Update

The Oxnard City Council adopted a whistleblower hotline policy on April 5, 2016. That policy states that the City will take all appropriate steps to thoroughly evaluate any allegation of improper governmental action that is brought to its attention. An *“improper governmental action” is defined as “any activity by a local agency or employee that is undertaken in the performance of the employee’s official duties, including activities deemed to be outside the scope of his or her employment, that is in violation of any local, state, or federal law or regulation relating to corruption, malfeasance, bribery, theft of government property, or willful omission to perform duty, is economically wasteful, or involves gross misconduct.”* The policy further states that the City establish a whistleblower hotline to receive and investigate allegations of possible City fraud, waste, and abuse. These complaints must remain confidential, and the identity of the complainant may not be revealed without the permission of the complainant, except to an appropriate law enforcement agency conducting a criminal investigation.

Periodically, the State of California amends legislation pertaining to whistleblowers. The State recently approved Assembly Bill 2455 (Stats. 2024, Ch. 568, Sec. 5), which amends California Government Code Section 53087.6 relating to whistleblower hotline definitions. Staff therefore recommends amending our adopted Whistleblower Policy to reflect the updated State law definitions. Attachment 1 shows the City’s adopted whistleblower policy with proposed changes shown in red. The proposed changes define “Contractor or Subcontractor” and update the definition of “Improper Governmental Action”. City staff also used this opportunity to update contact information, also shown in red.

The whistleblower system itself (online portal and call center) is managed by Syntrio, Inc.. Vasquez & Company provides internal auditing review for complaints received, and additionally manages the physical P.O. Box where reports are sent. Upon receipt of a complaint, the Internal Auditor may conduct an investigation into the facts alleged in the complaint to determine whether an improper governmental action has occurred. The Internal Auditor will first screen the allegation to determine merit and relevance, and then the possible risk to the City, among the following three options:

1. **High Priority** – Matters that are considered high priority could include: potential loss to the City of more than \$75,000, high level management involvement, collusion of multiple wrongdoers, major department-wide issues, or the need for immediate action to stop a potential major issue.
2. **Medium Priority** – Matters that are considered medium priority could include: potential loss to the City of more than \$25,000, include abuse of authority, medium-to-low level employee involvement, minor department-wide issues, or patterns of small issues that could be significant cumulatively.
3. **Low Priority** – Matters that are considered low priority could include: potential loss to the City of up to \$25,000, composed of isolated incidences of time abuse, wasteful practices that could lead to efficiencies if corrected, or allegations that lack credibility and evidence.

The internal auditor should investigate high priority matters with the most urgency, then medium priority, and finally, low priority.

The City provides the Finance and Governance Committee with this report summarizing the complaints received every six months.

## DISCUSSION

Employees or residents may file a complaint online at [www.clearviewconnects.com](http://www.clearviewconnects.com), by calling (844) 964-2544, or by mail at P.O. Box 11017, Toronto, Ontario, M1E 1N0. All complaints are routed directly to Vasquez for its determination within 24 hours of receipt whether the complaint has merit and relevance. If that is possible, Vasquez has another 24 hours to determine whether to rank the priority of the complaint high, medium or low (as defined above). After priority is determined, Vasquez has an additional 24 hours to notify City staff that 1) Vasquez has received a high or medium priority complaint and will be investigating the matter immediately, or 2) Vasquez has received a low priority complaint and needs to make a mutual determination with City staff as to whether that complaint should be investigated. For a high or medium priority complaint, Vasquez must then complete the investigation, prepare a report and present that report to the Finance and Governance Committee with thoroughness and speed, updating staff on the status of any investigation at least weekly.

In the fall, the whistleblower hotline was highlighted in the “HR News You Can Use” monthly newsletter that is distributed to all city employees. An overview of the program was provided which included the numerous ways that an employee could submit an allegation to the whistleblower hotline.

### Whistleblower Activity Report

The following allegations and complaints were received during the period of June 3, 2025 to December 31, 2025:

<b>Incident Number</b>	<b>Primary Type of Allegation</b>	<b>Source of Submission</b>	<b>Priority</b>	<b>Current Status</b>
10-2490136	Financial Reporting and Accounting	Website	N/A	Deemed non-fiscal or City related.
10-9174782	Theft	Website	N/A	Deemed non-fiscal or City related.

## Whistleblower Activity Summary

Two whistleblower reports were filed during this time period. Vasquez & Company deemed both allegations received during this time period unrelated to the City of Oxnard's fiscal matters. Both reports were forwarded to the appropriate department(s) for follow-up.

## **STRATEGIC PRIORITIES**

This agenda item supports the Organizational Effectiveness strategy. The purpose of the Organizational Effectiveness strategy is to reinforce, stabilize, improve, and strengthen the organizational foundation of the City in order to build a modern, high-functioning City government that effectively and efficiently supports the operating departments in providing high-quality services and programs for our residents and businesses.

This agenda item also supports the Quality of Life strategy. The purpose of the Quality of Life Strategy is to restore and increase quality services and programs that enrich Oxnard's diverse community, promotes safe neighborhoods, encourages community engagement, and supports our residents in their efforts to improve their quality of life.

## **FINANCIAL IMPACT**

There is no financial impact.

*Prepared by: Annie Jensen, Project Manager*

## **ATTACHMENTS**

1. Attachment 1 - Hotline Policy Update - 2025.v2
2. Attachment 2 - Presentation (1)

CITY COUNCIL OF THE CITY OF OXNARD

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF OXNARD  
UPDATING THE WHISTLEBLOWER HOTLINE POLICY

WHEREAS, on April 5, 2016, the City Council adopted Resolution No. 14,906, adopting a Whistleblower Hotline Policy pursuant to California Government Code Section 53087.6, which authorizes the City Council to approve establishing a whistleblower hotline to provide a confidential way for the public to report fraud, waste, abuse, and improper governmental activity; and

WHEREAS, Assembly Bill 2455 (Stats. 2024, Ch. 568, Sec. 5) amended California Government Code Section 53087.6 to add and modify definitions relating to whistleblower hotline policies; and

WHEREAS, the City Council wishes to update the Whistleblower Hotline Policy to incorporate the amendments to California Government Code Section 53087.6.

NOW, THEREFORE, the City Council of the City of Oxnard resolves that the updated Whistleblower Hotline Policy attached hereto as Exhibit "A" is hereby adopted.

PASSED AND ADOPTED THIS \_\_\_\_\_ day of \_\_\_\_\_, 2026, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

\_\_\_\_\_  
Luis A. Mc Arthur, Mayor

ATTEST:

\_\_\_\_\_  
Lourdes A. López, City Clerk

APPROVED AS TO FORM:

\_\_\_\_\_  
Stephen M. Fischer, City Attorney

# EXHIBIT “A”

## City of Oxnard Whistleblower Hotline Policy

### WHISTLEBLOWER PROTECTION

The City will take all appropriate steps to thoroughly evaluate any allegations of **fraud, waste, or abuse** or improper governmental ~~action~~ **activity** that are brought to its attention. **The City encourages anonymous or identified reporting by employees, volunteers, appointed or elected officials, members of the public, and contractors or subcontractors.**

No City official or employee shall take retaliatory action against any employee or member of the public who, based on a good faith belief, has made a complaint or allegation concerning **fraud, waste, or abuse** or improper governmental ~~action~~ **activity**. **Protection extends to all persons who participate in an investigation, provide information, or refuse to participate in wrongdoing.**

Any individual who files a complaint may elect to have their identity kept confidential **during intake and investigation to the extent permitted by law, unless the individual waives confidentiality in writing or disclosure is required to a law-enforcement agency conducting a criminal investigation.**—~~to the extent permitted by law unless the employee individual waives confidentiality in writing.~~

The City shall establish a Whistleblower Hotline in order to receive and investigate allegations of possible City Fraud, Waste, and Abuse **and Improper Governmental Activity**. This policy reflects the City’s ongoing commitment to support open, ethical, accountable, and transparent local government. **Identity and records will be protected consistent with confidentiality requirements and exemptions under the California Public Records Act (CPRA).**

### Purpose

It is the purpose of this policy to (1) encourage employees and members of the public to report information concerning any alleged **fraud, waste, or abuse** or improper governmental ~~action~~ **activity** or subsequent retaliation by the City’s officers or employees by providing them protection against retaliation, and (2) reinforce the expected values and behaviors of City officials, ~~and employees, and contractors or subcontractors because of their role~~ **and employees, and contractors or subcontractors** as guardians of the public trust and resources.

### Procedures

The following procedures aim to ensure accountability by creating a consistent and logical method for receiving and tracking allegations received through the Whistleblower Hotline. These procedures describe how the Internal Auditor and others involved in the reporting process will handle these allegations. Additionally, the procedures lay out a risk-based approach for using the Internal Auditor’s limited resources to investigate the allegations that could place the City of Oxnard at the greatest risk.

## Receiving Allegations

City staff or members of the public may submit allegations by either calling the Whistleblower Hotline's toll-free number, 1-(844) 964-2544 ~~\*\*\*.\*\*\*.\*\*\*~~, or by completing the online form located at ~~https://www.\*\*\*\*\*~~ <https://clearviewconnects.com/#/>. In addition, individuals may also submit allegations directly to the Internal Auditor. Any individual who files a complaint may elect to have their identity kept confidential. **Identity will be kept confidential during intake and initial review to the extent permitted by law (see § 53087.6(c)) and CPRA exemptions** ~~The individual's identity will be kept confidential to the extent permitted by law~~ unless the individual waives confidentiality in writing. Information can be submitted in person, over the phone, by voicemail, by e-mail, or by mail. The following provides the general procedure for receiving allegations.

### ***In-Person or Phoned-In Allegations***

Persons responsible for intake of allegations should adhere to the following procedures:

1. Ask about the subject of the allegation to ensure that the complainant is reporting to the correct entity. Determine if the allegation is about a City Department, Employee, ~~Vendor, or~~ Contractor, **or Subcontractor**; or if the complaint would fall under another jurisdiction.
  - If the allegation is not related to City government (for example, it is about a State or County Employee), refer the complainant to other relevant reporting options. See Reporting Options table. Enter the information in the Intake Log with a note about which entity the complainant was referred to.
2. If the allegation is about a City Department, Employee, ~~Vendor, or~~ Contractor **or Subcontractor**, start a conversation with the complainant about the allegation.
3. After obtaining a basic understanding of the allegation, if the complainant had not already provided his or her name, ask for their name and contact information. Discuss the complainant's preference about remaining anonymous. Note this information on the Intake Form. Persons receiving allegations may enter notes on paper or directly into the electronic form.
4. After gathering this information, continue the conversation about the allegation. Ask the questions from the Intake Form, if appropriate. However, use your discretion to ask additional questions. The form's questions are meant to be used as a tool to aid the conversation and to solicit possible additional evidence.
5. After completing the conversation, enter/review Intake Form notes and save the file on the Investigations database.
6. Log the allegation information on the Intake Log.
7. Discuss the allegation with appropriate Internal Auditor Staff. Depending on the severity of the allegations, this discussion might need to occur immediately. See Allegations section below. For less serious allegations, discussions of many allegations may take place during periodic whistleblower hotline meetings.

### ***Voicemail Allegations***

1. Listen to the voicemail.
2. Log the allegation information on the Intake Log.
3. Complete the Intake Form.

4. If necessary and contact information is available, seek additional information by using any contact information that the complainant provided.
5. If contact is made, update the Intake Form to reflect additional information.
6. Discuss the allegation with appropriate Internal Auditor Staff. Depending on the severity of the allegations, this discussion might need to occur immediately. See Allegations section below. For less serious allegations, discussions of many allegations may take place during periodic whistleblower hotline meetings.

### ***E-mailed or Mailed-In Allegations***

1. Read the e-mail or letter.
2. Log the allegation information on the Intake Log.
3. Complete the Intake Form.
4. If necessary and contact information is available, seek additional information by using any contact information that the complainant provided.
5. If contact is made, update the Intake Form to reflect additional information.
6. Discuss the allegation with appropriate Internal Auditor Staff. Depending on the severity of the allegations, this discussion might need to occur immediately. See Allegations section below. For less serious allegations, discussions of many allegations may take place during periodic whistleblower hotline meetings.

### ***Screening for Merit and Relevance***

The Whistleblower Hotline is open to the public at large. As such, it welcomes an expansive range of complaints. Therefore, it is important to consider, during the interview process, how the allegation may relate to waste, fraud, or abuse **or improper governmental activity** by the City, ~~or~~ its Employees, **Contractors or Subcontractors**. To do this, intake staff should think broadly about how the provided statements could tie into a related matter. Allegations, from a cursory review, could appear to lack in merit or relevance due to a myriad of reasons. However, upon a thorough and professional evaluation, they may point to an issue that puts the City at risk, which merits further investigation. However, cases that lack merit and relevance, as determined by insubstantial statements, should be documented and closed as 'Dismissed: Does Not Appear to Have Merit' in the Whistleblower Intake Log in order to preserve Internal Auditor resources. Taking these necessary steps protects the integrity of the Whistleblower Hotline and efficiently preserves public resources for matters that have merit and relevance.

## **Allegations**

The Intake Log and Intake Form requires Internal Auditor staff conducting the intake to rate the priority of the complaint using "low," "medium," and "high." This method is to help the Internal Auditor prioritize its investigations by targeting overall risk to the City of Oxnard. Any allegations that are rated "medium" or "high" should be presented to the City's Internal Auditor or relevant Internal Auditor staff as soon as practicable. Those rated "low" can be discussed during periodic hotline discussions. The following provides guidance about rating allegations:

### **High Priority**

Reasons why allegations may be considered high priority include a safety concern, losses to the City of Oxnard for more or equal to \$75,000, criminal activity resulting in a loss of at least \$400, high-level involvement, collusion of multiple wrongdoers, a major department-wide issue, or need for immediate action to stop a potential major issue. High-priority items should be discussed immediately. In addition, addressing these items could take priority over other investigations and audits – at the Internal Auditor’s discretion.

### **Medium Priority**

Allegations in this category could include a loss to the City of Oxnard for more or equal to \$25,000, abuse of authority, medium to low-level employee involvement, minor department-wide issues, or patterns of small problems that could become serious in the aggregate.

### **Low Priority**

Allegations in this category could include a loss to the City of less than \$25,000, isolated instances of time abuse, wasteful practices that would lead to limited gains in efficiencies if corrected, or allegations that lack credibility and evidence. The Internal Auditor would aim to investigate items in this list, but may not do so because of limited resources or if the complaint is insubstantial due to a lack of sufficient information to warrant an investigation. However, if the same or similar issues were reported multiple times, low priority items may become more of a priority.

## **Allegations Covered by the Internal Auditor**

The hotline is designed to promote good government by providing City employees and members of the public with a way to report allegations of fraud, waste, and abuse **or improper governmental activity**.

In 2009, State Law went into effect that enabled local government auditors to establish whistleblower hotlines and to provide whistleblower protections. Local auditors are authorized under California Government Code Section 53087.6 to create whistleblower hotlines with the approval of their respective legislative bodies.

~~The~~ California Government Code **Section 53087.6** defines “fraud, waste, or abuse” **or “improper governmental activity”** in this context as “any activity by a local **government agency, or employee, or contractor or subcontractor** “that **is may be** in violation of any local, state, or federal law, **ordinance**, or regulation relating to corruption, malfeasance, bribery, theft of government property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse **or misappropriation** of government property, **funds or resources**, or willful omission to perform **a** duty, is economically wasteful, or involves gross misconduct.”

The following further defines fraud, waste, and abuse:

**Fraud** -- The Association of Certified Fraud Examiners defines occupational fraud as “the use of one’s occupation for personal enrichment through the deliberate misuse or misapplication of the employing organization’s resources or assets.”

Some examples of possible fraud include theft of City funds or property, accepting or soliciting a bribe or kickback, falsifying payroll information, falsifying financial records to hide theft, submitting a false voucher, or using city property for non-City business.

**Waste** -- Waste can be intentional or unintentional and can involve unnecessary or extravagant City expenditures or misuse of City resources.

**Abuse** -- This is the use of an employee's position in the City to obtain personal gain for that employee or for someone else like a family member or friend.

The above definitions are meant to provide guidance, and are not meant to cover all types of allegations that will be investigated.

## Additional Definitions

**Contractor or Subcontractor** means a person, firm, corporation, partnership, vendor, or association and its responsible managing officer, as well as any directors, owners, coowners, shareholders, partners, supervisors, managers, employees, and other individuals associated with the contractor or subcontractor who has submitted a bid or proposal; seeks to contract with, contracted with, or is in a contractual relationship with; or receives funding, including, but not limited to, grants from the City, or a department created by the City.

**Employee** means anyone employed by the City, whether in a permanent or temporary position, including full-time, part-time and intermittent workers. It also includes volunteers and members of appointed boards or commissions, whether or not paid.

**Good faith belief** means an honest and reasonable belief based on personal knowledge.

~~**Improper governmental action** means any activity by a local agency or employee that is undertaken in the performance of the employee's official duties, including activities deemed to be outside the scope of his or her employment, that is in violation of any local, state, or federal law or regulation relating to corruption, malfeasance, bribery, theft of government property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse of government property, or willful omission to perform duty, is economically wasteful, or involves gross misconduct.~~

**Retaliatory action** means any adverse change in an employee's employment status or the terms and conditions of employment resulting from an employee's complaint or allegation of an improper governmental action based on good faith belief.

## Allegations Covered by Other City Offices

Some allegations are more appropriately investigated by other City Departments. The intent of establishing a whistleblower hotline is not to replace or limit other reporting options. Specifically, many Human Resources related issues should still be reported to the appropriate Human Resources staff. For example, labor grievances, discrimination allegations, and workers' compensation claims should be reported under the City's current procedures. Also, some callers may want to report legal issues to the

City Attorney's Office, or code enforcement issues to the Development Services Department. As appropriate, the Internal Auditor will refer reporters to other City departments. However, it may also be appropriate for Internal Auditor staff to gather initial information in these areas to better understand the issues involved.

***Internal Referrals Reporting Options:***

Human Resources Department for workers' compensation information, union grievance procedures, and environmental health and safety programs like OSHA and DOT compliance:

805-385-7590

<http://hr.cityofoxnard.org/11>

<https://www.oxnard.gov/human-resources-department>

Financial Resources - Risk Management for liability claims:

805-385-7475

<http://finance.cityofoxnard.org/8/>

<https://www.oxnard.gov/finance>

City Attorney:

805-385-7483

<http://cityattorney.cityofoxnard.org/1>

<https://www.oxnard.gov/city-attorneys-office>

Code Compliance Division for neighborhood code, housing and dangerous buildings, business compliance, landscape requirements, rental house standards, and anti-graffiti:

805-385-7940

<http://developmentservices.cityofoxnard.org/Uploads/code/>

<https://www.oxnard.gov/community-development/code-compliance>

Police for non-emergencies:

805-385-7600

<https://www.oxnardpd.org/>

**Reporting Options for Allegations Covered by Non-City Agencies**

<b>Jurisdiction</b>	<b>Organization</b>	<b>Reporting</b>	<b>Methods</b>
<b>County of Ventura</b>	County Auditor- Controller	Audit Fraud Hotline	805-644-6019  <a href="mailto:Fraud.Hotline@venturacounty.gov">Fraud.Hotline@venturacounty.gov</a> Audit Fraud Hotline/ County of Ventura/ 800 South Victoria/ Ventura, CA 93009-1540
<b>State of California</b>	Bureau of State Audits	Whistleblower Hotline	800-952-5665 Investigations/ <del>California State Auditor-Bureau of State Audits/</del> 555 621 Capitol Mall, Suite 1200300/ Sacramento, CA 95814 <del>Oxnard, CA 95814</del> <a href="https://www.auditor.ca.gov/whistleblower/">https://www.auditor.ca.gov/whistleblower/</a> <a href="http://www.bsa.ca.gov/hotline/filecomp">http://www.bsa.ca.gov/hotline/filecomp</a>
<b>Consumer Complaints Against a Business</b>	California Office of the Attorney General	Comment/ Complaint Form	<a href="https://oag.ca.gov/contact/consumer-complaint-against-business-or-company">https://oag.ca.gov/contact/consumer-complaint-against-business-or-company</a>
<b>Consumer Complaints Against a Business</b>	Better Business Bureau	Complaints	<a href="https://www.bbb.org/consumer-complaints/file-a-complaint/get-started">https://www.bbb.org/consumer-complaints/file-a-complaint/get-started</a>
<b>California Attorneys</b>	State Bar of California	Complaints	800-843-9053 <a href="https://www.calbar.ca.gov/public/file-complaints-claims">https://www.calbar.ca.gov/public/file-complaints-claims</a> <a href="http://www.calbar.ca.gov/Attorneys/LawyerRegulation/FilingaComplaint.aspx">http://www.calbar.ca.gov/Attorneys/LawyerRegulation/FilingaComplaint.aspx</a>
<b>California Judges</b>	Commission on Judicial Performance	Complaints	415-557-1200  <a href="http://cjp.ca.gov/file_a_complaint.htm">http://cjp.ca.gov/file_a_complaint.htm</a> <a href="https://cjp.ca.gov/online-complaint-instructions/">https://cjp.ca.gov/online-complaint-instructions/</a>

## Special Circumstances

1. The Internal Auditor may receive allegations about elected officials. As the Internal Auditor does not generally have the authority to audit the City Council without their request to be audited, allegations involving these officials shall be discussed with the Internal Auditor immediately. The Internal Auditor and other City officials, if necessary, will discuss how to evaluate these types of allegations.
2. Additionally, allegations may be received about members of the Internal Auditor's staff. If such allegations occur, those receiving the allegations should report them to the Internal Auditor immediately. The Internal Auditor and any other Internal Auditor staff who become aware of the complaint will evaluate the allegation, possibly with the advice of other City staff and officials, to determine if an investigation shall be conducted by the City or by an outside entity. The Internal Auditor's staff is expected to keep the allegation confidential and not inform the individual who is the subject of the allegation. If the complaint is about the designated Internal Auditor, the individual receiving the allegation should discuss it with another staff member and possibly seek guidance from City staff or officials to determine how to proceed.

## Periodic Reporting

The Internal Auditor shall, at least every six months, report to the Finance and Governance Committee on the allegations received through the Whistleblower Hotline, including the priority assigned and the status or disposition of each reported allegation.

## Contact Information for the Internal Auditor Appointed by the Oxnard City Council:

Vasquez & Company, LLP  
Roger Martinez  
655 N. Central Avenue, Suite 1550  
Glendale, CA 91203  
(213) 873-1777  
<https://www.vasquez.cpa/>

# Update on Whistleblower Policy and Biannual Update

Presentation to the Finance & Governance Committee  
January 27, 2026

Presented by:  
Annie Jensen, Project Manager

An “improper governmental activity” is defined as:

*“Any activity by a local agency, employee, or contractor or subcontractors that may be in violation of any local, state, or federal law, ordinance, or regulation relating to corruption, malfeasance, bribery, theft of government property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse or misappropriation of government property, funds or resources, or willful omission to perform a duty, is economically wasteful, or involves gross misconduct”*

I) Additional definitions: Contractor or Subcontractor

*“...means a person, firm, corporation, partnership, vendor, or association and its responsible managing officer, as well as any directors, owners, coowners, shareholders, partners, supervisors, managers, employees, or other individuals associated with the contractor or subcontractor who has submitted a bid or proposal; seeks to contract with, contracted with, or is in a contractual relationship with; or receives funding, including, but no limited to, grants from the City, or a department created by the City.”*

**Reporting options:**

Ventura County Auditor-Controller

State of California Bureau of State Audits

California Office of the Attorney General

Better Business Bureau

State Bar of California

Commission on Judicial Performance

- Employees or residents may file a complaint online at <https://clearviewconnects.com/#/> ; by calling 1 (844) 964-2544; or by mail to P.O. Box 11017, Toronto, Ontario, M1E 1N0.
- Reports are routed to Vasquez and Company for determination of relevance and merit within 24 hours of receipt.
- If report is determined to be non-fiscal or city related (does not have merit or relevance) it is forwarded to the appropriate City department or outside agency for processing.
- If the report is determined to have merit and relevance, Vasquez will rank the priority of the complaint within another 24 hours.
  - If it's a low priority complaint, Vasquez and the City must make a mutual determination as to whether an investigation is needed.
  - If it's a medium or high priority complaint, Vasquez has 24 hours to notify City staff that they (Vasquez) will be investigating the matter immediately.

- There were **2** total reports received between 6/3/25 – 12/31/25
- Both were determined to be non-fiscal or City related by the internal auditor.

Primary Type of Allegation	Number of Reports Received
Violation of Laws, Regulations, Policies and Procedures	0
Financial Reporting and Accounting	1
Unethical Conduct	0
Manipulation or Falsification of Data	0
Fraud	0
Theft	1
Unethical Conduct	0
Undefined	0



# QUESTIONS