

2025—2026

Riverside County Civil Grand Jury



**6/08/2026**

**Code Enforcement:  
Not Living up to Code**

## **SUMMARY**

The stated mission of the County of Riverside Code Enforcement (Code Enforcement) is to enhance public safety and the quality of life in partnership with communities through fair enforcement of laws and codes. To the contrary, the 2025–2026 Riverside County Civil Grand Jury (Grand Jury) has found through its investigation that the “fair enforcement of laws” is not the consistent behavior of Code Enforcement, either with the public or within its own ranks.

The Grand Jury began their investigation into Code Enforcement by looking at internal operations of the department, and incidents of which alleged a hostile work environment, bullying, favoritism, and defamation.

As the Grand Jury began looking into the internal operations, additional areas of concern were found within Code Enforcement, which are identified below.

The overriding problem identified is that the culture of the department is not aligned with its mission. Within Code Enforcement the attitudes and behaviors of a few individuals seems to have shaped the actions within the department as a whole. This seems to be an ongoing issue that has not been addressed. This aspect of Code Enforcement was investigated through the workings of the various functions and findings within the department.

### **Areas of concern and the basis of the departmental findings were identified as follows:**

1. Abusive and retaliatory management behavior
2. Unprincipled promotional processes
3. Selective Code Enforcement
4. Board Policy inconsistencies
  - a. Board Policy C-25: Non-Discrimination and Anti-Harassment and Complaint Procedure
  - b. Board Policy C-27: Workplace Violence and Threats
5. High director turnover
6. Communication processes
7. Chain of command

### **Recommendations for improvement:**

Based on the Grand Jury’s Findings, it is recommended that Code Enforcement include clear language in an updated policy manual for employees to understand the complaint process. In addition, there should be some guardrails in place with respect to the hiring and promotional process to prevent favoritism. Also, there needs to be a documented process in place to address selective enforcement. Finally, the leadership in the department should establish a clear chain of command, including written communication, and a visible presence in all district offices.

## **BACKGROUND**

Code Enforcement is a department within the Transportation and Land Management Agency (TLMA), a public protection agency. “Riverside County Code Enforcement Department’s mission is to: Keep Communities Safe & Improve the Quality of Life. The department works toward these goals by first encouraging voluntary compliance followed by an increasing level of enforcement techniques that respect the rights of property owners while providing a pathway to compliance.”<sup>1</sup>

Code Enforcement maintains five district offices located in Perris, Lake Elsinore, San Jacinto, Palm Desert, and Cabazon. Additionally, there is an administrative office in the Riverside County Administrative Center (CAC).

Code Enforcement is responsible for enforcement of over thirty-six County ordinances in the unincorporated areas of Riverside County. The teams within Code Enforcement include Neighborhood Enforcement, Cannabis Enforcement, Special Enforcement, Tire Team, Combustible Material Task Force, and Special Enforcement on Short Term Rentals (STR). These teams’ cases include: occupied recreational vehicles, illegal dumping, homeless encampments, fireworks, unpermitted cannabis facilities/grows, and unpermitted event venues. Additional cases can include accumulated rubbish, grading without a permit, inoperable vehicles, excessive noise, parking violations, and regulating roadside (street) vendors.

Code Enforcement works regularly with various county departments, such as Animal Services, Environmental Health, Fire, Sheriff, District Attorney, as well as other cities within Riverside County.

Funding for Code Enforcement comes from a net cost allocation from the general fund, and is supplemented through cost recovery efforts. Additional funding support comes from grant programs, court ordered settlement agreements, and Transitory Occupancy Taxes from STR.

In Fiscal Year 2025/26 Adopted Budget, Code Enforcement has eighty-one funded positions. Department expenditures are \$17,715, 935 and revenues are \$8,348,379. *County of Riverside, Fiscal Year 2025-26 Adopted Budget Volume I, 338.*

“The Code Enforcement department is expecting to have an overall reduction in revenue in FY 2025/26 compared to current fiscal year. This is mainly due to reduction in short term rentals due to STR moratoriums and litigation settlement revenues. While salaries and benefits cost have increased, legal services, abatement, fleet, and agency overhead allocations have gone down. The department is projecting to draw \$2.9 million from the abatement fund for FY 2025/26.”<sup>2</sup>

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<sup>1</sup> Riverside County Budget Book.

<sup>2</sup> Riverside County Budget

Clarification: “current fiscal year” in previous paragraph is identified as FY 2024/25.

## **METHODOLOGY**

### **CITIZENS COMPLAINT**

#### **Interviews:**

The Grand Jury conducted twenty-seven interviews with current county employees, previous county employees, and a Laborers’ International Union of North America (LIUNA) Labor Relations Representative. These interviews were conducted with Code Enforcement employees, encapsulating a wide range of organizational chart titles. Those included Code Enforcement Aides, Code Enforcement Technicians, Code Enforcement Officers, Senior Code Enforcement Officers, Supervising Code Enforcement Officers, and upper management. Another five interviews were conducted with previous Code Enforcement employees.

The Grand Jury also interviewed employees of TLMA, County of Riverside Human Resources (HR) and County of Riverside Executive Office.

Note: Former County Code Enforcement employees were not interviewed; however, data pertaining to them was gathered by documents provided by County HR.

#### **Documents Reviewed:**

1. Code Enforcement:
    - a. Organizational Charts
      - i. January 2022 through August 2025
    - b. Standard Operating Procedures (partial revision as of November 12, 2025)
    - c. Fee items, descriptions, and amounts
    - d. Special Enforcement Team (SET) statistics from 2023 and 2024
    - e. Code Enforcement Manager interview schedules
    - f. Performance Evaluations
    - g. Departmental memo dated December 5, 2024
      - i. From: (Code Enforcement Management)
      - ii. Subject: Supervising Code Enforcement Officer–Expectations/Goals
    - h. Email correspondence from multiple employees
  2. County of Riverside Board of Supervisors (BOS)
    - a. Fiscal Year 2025/2026 Adopted Budget
    - b. County policies
      - i. Ordinance No. 440
      - ii. Employee Performance Evaluation Reports: C–21
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- iii. Disciplinary Process: C-23
  - iv. Non-Discrimination and Anti-Harassment and Complaint Procedure: C-25
  - v. Workplace Violence and Threats: C-27
  - vi. Standards of Ethical Conduct to Address Fraud, Waste and Abuse: C-35
3. County of Riverside Human Resources
- a. Code Enforcement job descriptions (seven total)
  - b. Code Enforcement department head list (last fifteen years)
  - c. Code of Conduct—Riverside County Employee Handbook
  - d. Interview packages
  - e. Report of Code Enforcement Cases—(2025) C-25s
  - f. Multiple C-25, C-27 and C-35 filed by Code Enforcement employees
  - g. Email correspondence in regard to C-23, C-25 and C-27 complaints
  - h. Independent law firm investigation of previous Code Enforcement director
  - i. LIUNA Memorandum of Understanding
4. Miscellaneous
- a. Retaliation | U.S. Department of Labor
  - b. Fact Sheet #77B: Protection for Individuals under the FMLA | U.S. Department of Labor

## **DISCUSSION**

### **Abusive and Retaliatory Management Behavior**

Merriam-Webster defines abusive as “a: using harsh, insulting language” and “2: characterized by wrong or improper use or action.”<sup>3</sup>

In a memorandum dated December 5, 2024, from Code Enforcement management, there were expectations/goals set for the Code Enforcement Officer team. Some of these expectations included “conduct that met with professionalism and respect, courtesy towards supervisors, peers, other staff, community members and other colleagues when carrying out your job duties.” When the Grand Jury conducted interviews with multiple employees that interacted with Code Enforcement management, they described behaviors that included shouting, bullying employees who expressed disagreement, spreading unfounded rumors or gossip, and a general lack of courtesy. A former key manager in Code Enforcement documented abusive behavior from another member of Code Enforcement management, but was then forced to resign for similar issues.

In many cases over the last two years, employees have been subjected to extreme changes in work environment, duties, or assigned work location without discussion. The terms “highway therapy” or “punishment detail” were brought up during interviews (with both current and former employees) that described these approaches, which were punitive methods they

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<sup>3</sup> <https://www.merriam-webster.com/dictionary/abusive> - ABUSIVE Definition & Meaning - Merriam-Webster.

interpreted as a method management was using to provoke employees to resign, transfer out of the department, or retire early. “Highway therapy” is used as a form of retaliation for those who have spoken up, crossed managers authority, and/or for perceived disloyalty towards management, as described during the interview process. Employee’s perceptions are that individuals have been transferred to distant workplace locations without any discussions taking place between the employee and management.

“Highway therapy” transfers affect the work environment for the employees, as they now have to reorient themselves to these newly assigned work areas and assignments. Another consequence is they set the employees up for failure, that can ultimately result in disciplinary actions, termination or resignation. “Punishment detail” is also being used as a form of retaliation by removing employees from current assignments and placing them into an office where they do not want to be, and where they have unrelated background experience. Constant movement of employees wastes training time, aptitude, and expertise. Additionally, it has created frustration, resentment, and anger to those employees that are affected.

These terms, although denied by current management in both Code Enforcement and TLMA, have been a common point of discussion throughout the Grand Jury’s interviews. The culture of Code Enforcement appears to have been driven by a selective core of individuals who may have fostered a culture of fear, suspicion, and distrust within the ranks. There seems to be a disconnect between upper management and lower-level employees.

### **Family and Medical Leave Act (FMLA)**

The FMLA Worker’s Guide to Medical Leave states:

“FMLA retaliation occurs when an employer takes negative action against an employee because they used or tried to use their FMLA leave rights. This can include being fired, demoted, losing a promotion, having pay reduced, or even being given a less desirable job. Retaliation does not always happen immediately, but if you notice changes in your work environment, it could be a sign that your employer is retaliating.”<sup>4</sup>

The Grand Jury was advised by witnesses that an individual, while out on approved FMLA, was removed from their position as a field operations supervisor over multiple Code Enforcement officers. This employee was also removed from their work location at their previously assigned office, and had their work schedule modified. This individual was not notified directly in regards to this reassignment, only upon returning from FMLA were they made aware of the reassignment. Each of these actions may violate FMLA law and may be an example of retaliation.

### **Unprincipled Promotional Processes**

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<sup>4</sup> <https://www.shouselaw.com/ca/labor/leave-laws/family-and-medical-leave/#7>. - FMLA: A Worker’s Guide to Medical Leave in California.

Recruiting and promotional guidelines have been developed (by HR) in order for Code Enforcement employees to be able to follow a career progression path within the department, wherein employees can gain both experience and knowledge to successfully promote from within. However, it appears to the Grand Jury that employees have been promoted within the organization inequitably—not necessarily based on job qualifications and recruiting guidelines—but based on favoritism, external friendships, and manipulated resumes.

The Grand Jury uncovered multiple examples of this practice taking place. One example was the hiring of a Code Enforcement Technician, an entry-level classification, in 2023. This class concept is defined as: “Under direct supervision, conducts a variety of routine investigations in support of compliance activities of land use ordinances and related code provisions; and performs other related duties as required. Incumbents provide support and receive direction from Code Enforcement Officers and unlike Code Enforcement Officers, the incumbents do not issue citations or perform complex investigations.”<sup>5</sup>

The natural progression of a Code Enforcement Technician would be as follows:

- Code Enforcement Officer I: an entry-level classification in the Code Enforcement Officer series, a progression underfill for the Code Enforcement Officer II
- Code Enforcement Officer II: incumbents are eligible to promote to this position upon successful completion of their 12-month probationary period as a Code Enforcement Officer I
- Senior Code Enforcement Officer: lead level classification in the Code Enforcement Officer series
- Supervising Code Enforcement Officer: supervising level classification in the Code Enforcement Officer series

The Grand Jury’s investigation revealed that a Code Enforcement Technician was selected as a candidate for the position of Senior Code Enforcement Officer (Senior Officer), despite having less than two years of experience in the department and not having progressed through the established Code Enforcement series. The Senior Officer recruitment package clearly required:

- Experience: Three years of technical experience in investigations, abatement, land use, zoning, building inspections, public safety, code enforcement or administration of justice
- Of the three years, two years must be equivalent to the level of Riverside Code Enforcement Officer II

The candidate did not meet these minimum qualifications. Upon the Grand Jury’s review of the candidates resumes, by inserting the required qualifications verbatim into their resume under prior work experience—the candidate was advanced to the interview stage and was ultimately promoted. This occurred while several highly experienced field officers, all of whom met or exceeded the stated requirements, according to resumes, were passed over.

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<sup>5</sup> Class Specifications.

Eight other candidates (two of which were also promoted to Senior Officer) met the required minimum qualifications, with Code Enforcement experience ranging from just under three years, to more than twenty.

Another potential candidate was disqualified, as it was indicated they had only two years of qualifying technical experience, below the three-year minimum qualification threshold. Yet the promoted candidate, who fell even below that threshold, was allowed to advance.

Although there is a supplemental questionnaire that is completed online through HR, the Grand Jury found several candidates' resumes were not current, and did not reflect updated Code Enforcement experience.

The other example the Grand Jury found was the hiring of a second TLMA manager, which at the time was vacant. The promotion appears to have been potentially influenced by friendships, rather than the required level of qualifying experience. Unlike the Code Enforcement Officer series, this position is an advanced journey level classification that reports directly to a TLMA Department Head. The class concept is defined as: "Under general direction, plans, organizes and manages operational and administrative functions within a Transportation and Land Management Agency (TLMA) department; makes recommendations for the development, implementation and improvement of departmental operations, services and programs; performs other related duties as required."<sup>6</sup> According to the TLMA Manager recruitment package, required minimum qualifications for experience are: Three years of professional experience functioning in a managerial, supervisory or administrative capacity within a public works department or organization, which involved responsibility for administration, planning, organization, and implementation of a variety of complex programs and projects.

A total of 101 applications were received; forty-seven candidates advanced to the recruiter review based on the following order of priority:

1. Verified eligible Veterans
2. County employees
3. Candidates scoring 91% or higher during the Minimum Qualifications/Desired Qualifications step

During the phone pre-screening, conducted by the recruiter, twelve candidates were certified as meeting the minimum qualifications. These candidates were certified and referred back to the department.

Following the issuance of the certified list, a department's manager contacted recruiting to inquire as to why a particular candidate had not been included on the list. Upon documents reviewed by HR, it was determined that the candidate did not clearly demonstrate the required level of qualifying experience for the position. The same manager requested that recruiting provide this candidate an opportunity to further elaborate on their experience and submit another

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<sup>6</sup>Class Specifications

updated resume. Based upon this now-altered resume, recruiting determined that this candidate now met the minimum qualifications and was added to the certified hiring list.

At the time of the interview this candidate had been working in Code Enforcement for less than two years.

Other candidates had more experience in Code Enforcement and higher levels of education. Two of these candidates had master's degrees, and their experience in the department averaged fifteen plus years. Another candidate with eighteen years' experience withdrew from the interview process.

During the Grand Jury's interviews, a question was asked of the interviewees: "Are promotional opportunities and recruiting processes fair?" The majority of responses indicated that decisions are not being made fairly. Witnesses told the Grand Jury that the decisions are made based on favoritism and friendships, that more qualified candidates are being overlooked, that interview panels are hand selected, and that a selective few are running the show.

Overlooking employees (for promotional opportunities) who are invested in a department can lead to a less-than-ideal work environment. A lack of recognition can cause bad morale, low productivity, and a decline in motivation.

This practice can also lead to high turnover, which has transpired in Code Enforcement. It has led to specific people being forced out—by taking early retirement, transferring out of the department, or leaving the county altogether, feeling there's a dead-end road to being able to promote from within.

### **Selective Code Enforcement**

County of Riverside Code Enforcement Department Policy 1.1, Article VI (Professional Conduct/Code of Ethics) states, "Staff will not permit personal feelings, prejudices nor influences (political or otherwise) to interfere, prohibit or delay the process of enforcement."

One of the core responsibilities of Code Enforcement is to uphold County rules and standards through the consistent and impartial application of land-use ordinances. The integrity of this process has previously been called into question, most notably in a Riverside County Civil Grand Jury 2015–2016 report. That report concluded that interference by the County of Riverside Board of Supervisors (BOS) contributed to ongoing selective enforcement of County ordinances. Although initial concerns were considered anecdotal, testimony from Code Enforcement personnel substantiated the claims.

The most significant findings involve enforcement practices in some of the most tourist driven destinations in Riverside County. Unlike other areas of the County, where enforcement followed established procedures, cases in these regions followed a separate protocol. Code Enforcement officers were told, because of the political nature of the areas, to "stand down" and "tread

lightly” due to “personal relationships.” These directives were originating from the BOS offices. Additionally, interview testimony revealed that BOS staff asked Code Enforcement officers to pause certain investigations, and/or the issuance of potential citations, due to the influence of certain constituents and their contributions to the BOS. This also included illegal swap meets continuing to be held due to these alleged contributing constituents to the BOS.

During the course of the Grand Jury interviews, upper management interviewees claim they were unaware of these “stand down” orders, but multiple Code Enforcement officers testified that these were given, most often verbally (via phone calls).

### **Riverside County Tourism**

In 2023, Riverside County’s tourism industry generated a record high of over \$8 billion in direct visitor spending.<sup>7</sup> This includes historic urban centers, premier wine tasting regions, luxury desert resorts, and vast natural wonders. On top of this, Riverside County’s Gross Domestic Product (GDP) is approximately \$135 billion. It boasts the ninth largest county economy in California and ranks in the top 1.5% of all U.S. counties.

Given its economic significance, the region’s business owners and industry leaders hold considerable financial influence and political leverage. As a result, Code Enforcement actions, such as identifying violations or issuing citations, are often unwelcome. Communications from the BOS to TLMA or Code Enforcement have reportedly resulted in citations being dismissed or future inspections being curtailed. Specific properties were repeatedly identified as those associated with these “stand down” orders.

- Holding continuous unpermitted events
- Given repeated extensions for compliance, up to eighteen months (normal timeframe is thirty days to six months)
- Holding weddings in unpermitted structures, violating the Americans with Disabilities Act (ADA) path of travel
- Removal of a Code Enforcement officer for not adhering to “hands off” directives due to “personal relationships”
- In late 2024, license was suspended by the Franchise Tax Board for an extended period of time
- Dismissal of noise violation citations (\$500)

### **Airbnb Impact**

Short-term rentals (STRs) like Airbnb have a major impact on Riverside County’s economy and housing market, generating vital tax revenue for the county while simultaneously straining local housing availability and neighbor relations.<sup>8</sup> Riverside County has enacted specific laws that directly impact short-term rental operations. These laws were created to ensure that rental

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<sup>7</sup> <https://rivco.com>

<sup>8</sup> <https://pressenterprise.com/short> term rental rules tightened by Riverside County supervisors

activities are harmonious with neighborhood values while providing guidelines for property owners.<sup>9</sup>

The surge in STR is an especially important piece of this equation, with tourists paying premium nightly rates, often splitting the cost to rent larger homes.

A particular area within Riverside County is described as a high-end, luxury community. Within this community are several large-scale rental homes. In 2025, two particular rental properties were labeled as “party houses.” Directives to a Code Enforcement officer were to be “hands off” on these two problem properties, due to political interference. No enforcement was allowed to happen, the illegal activity continued, with complaints going unanswered.

Numerous interviewees validated that interference by the BOS adversely affected the outcome of Code Enforcement officers’ fair enforcement of the laws and codes that are in place to protect all Riverside County constituents. The challenges facing Code Enforcement reflect broader systemic pressures that arise when economic interests, political influence, and public safety intersect. When enforcement decisions can be altered or halted through political intervention, the county risks eroding public trust and compromising the principle of equal application of the law.

### **Board Policies C-25 and C-27 Inconsistencies**

The Human Resources Department (HR) for the County of Riverside makes available to all employees a process by which they can communicate grievances at work. If an employee feels they have been harassed or discriminated against, they have the right to file a complaint through the Labor Relations Division of HR. BOS Policy C-25—*Non-Discrimination and Anti-Harassment and Complaint Procedure* states: “The purpose of this policy is to protect the right of employees to be free from unlawful discrimination, harassment, and retaliation, and to set forth a procedure for promptly investigating and taking appropriate remedial action in dealing with internal complaints of unlawful discrimination, harassment, and retaliation.”<sup>10</sup> Any type of retaliation or punishment for the filing of a complaint is prohibited.

This process is initiated when an employee completes a C-25 complaint, either orally or in writing to any of the following:

- Immediate supervisor
- Any supervisor or management employee/officer within the department, including the department heads
- Any supervisor or management employee/officer within the County of Riverside
- The Human Resources Department, Employee Relations Division

Policy C-25 specifically states as follows:

“Any supervisor or management employee, or County officer who receives a discrimination/harassment complaint shall: (1) provide the employee and/or job applicant with a

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<sup>9</sup> Steadily.com/Airbnb and Short-term rental laws and Regulations in Riverside 2026

<sup>10</sup> <https://rivcocob.org/sites/g/files/aldnop311/files/migrated/wp-content/uploads-2013-05-C-25-10-28-14.pdf> - County of Riverside, California.

copy of the C-25 policy and refer them to Attachment B, and (2) immediately notify the Human Resources Department.”<sup>11</sup>

Upon receiving the C-25 complaint the department head, the HR director (or designee) shall immediately authorize and supervise the investigation of the complaint. This would include interviews, reviewing factual information, and taking reasonable steps to protect the complainant from further discrimination, harassment or any type of retaliation.

By design, a C-25 complaint must meet the definable parameters as described in the BOS policy to be categorized as discrimination, harassment or retaliation. Not all C-25 complaints fielded by HR reach a level to warrant a full investigation. Many of these complaints are categorized as “rude and discourteous behavior” and are either disregarded or not brought to the attention of the department head.

In interviews with several leaders in HR, it was explained that almost 80% of the C-25 complaints were reduced to the categorical definition of “rude and discourteous behavior.” However, if any of these complaints involve a supervisor or manager, it is left up to the discretion of the department head whether or not to communicate the findings, regardless of how many are filed against a particular manager.

The number of C-25s (copies) the Grand Jury received directly from employees, and the number received, upon request, from HR did not reconcile. The Grand Jury concluded that many of these did not ultimately reach HR, but were internally dismissed, and therefore never reached the interview and/or investigative procedural process.

The LIUNA Labor Relations Representative that was interviewed confirmed that at least seven C-25 complaints were filed against Code Enforcement management from September 2024 to September 2025. The basis of these complaints involved role changes (officers taken out of the field), lack of positive leadership structure, turnover, and favoritism. Three of these were specifically filed against a manager from Code Enforcement (abusive behavior). Because of the nature of the MOU<sup>12</sup> which defines the policies for the complaint process between employees and management, there was little that the union could do to assist the employees that had experienced issues with management. During Grand Jury interviews with Code Enforcement and TLMA leadership, witnesses stated they are aware of many of the complaints, yet pass them off as minor in nature-and as a byproduct of disgruntled employees. Two of the requirements for Policy C-25 are “take initial complaints seriously” and “ensure that all managers and supervisors take immediate action.” A key manager also acknowledged as to whom these complaints were filed against, and, in addition, was made aware from the LIUNA representative that it is unusual to have so many complaints filed against the same individual.

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<sup>11</sup> County of Riverside C-25 Policy.

<sup>12</sup> 2024 - 2027 MOU between COR and LIUNA.

The disconnect with the culture of Code Enforcement between management and employees seems to be the lack of a mechanism that would allow employees to be heard when they have legitimate complaints that do not reach the level of discrimination, harassment, or retaliation.

The Policy C-27—*Workplace Violence and Threats* states: “It is the policy of Riverside County (County) that there are strict and severe consequences for all threats and violent behavior by County employees in the workplace or in connection with their employment by the County. Zero-tolerance means that any acts of violence by County employees that result in a violation of this policy will not be tolerated and shall result in strict and severe disciplinary action, which may include termination. To ensure healthy and safe workplaces and to reduce the risk of violence, all employees should review and understand all provisions of this policy. This policy includes and covers threats and violent behavior, direct, indirect, implied or actual, from any person, and directed toward any person, occurring at any County facility or in connection with the conduct of County business without regard to location.”<sup>13</sup>

Although the number of C-27 complaints the Grand Jury received was far fewer than C-25s, both complaints were against the same manager. The complainants felt a sense of threatening aggressive behavior and “yelling with anger.”

Investigative findings from County HR determined that there was not sufficient corroborating evidence and “no significant threat.” These complaints were returned to Code Enforcement executive management for resolution. Mandatory consequences are the backbone of zero-tolerance policies. “A zero-tolerance policy is a strict organizational approach that mandates predetermined, immediate consequences for specific violations or behaviors, regardless of circumstances, context, or the severity of individual incidents. Unlike traditional disciplinary approaches that allow for managerial discretion, zero tolerance policies eliminate the gray areas by applying consistent, automatic penalties for defined infractions.”<sup>14</sup>

It remains undetermined how these complaints were handled once returned to Code Enforcement. According to a Principal HR Analyst, the department head has the final word on discipline. The question remains—was there any?

## **Director Turnover**

Turnover of the Code Enforcement director position has been a concern. Over the last fifteen years, there have been twelve interim and full-time directors with the longest tenured individual reaching only three years in the position. The tenure of a director, on average, is around two years.<sup>15</sup>

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<sup>13</sup> County of Riverside C-25 Policy.

<sup>14</sup> Zero Tolerance Policy: Definition, Examples & HR Guide.

<sup>15</sup> TLMA Code Enforcement Organizational Charts 2010-2025.

Multiple individuals from the Executive Office implied that Code Enforcement has had a history of high turnover due to the demands of the department and an image where Code Enforcement officers have been mistaken for the police or Immigration and Customs Enforcement (ICE).

In addition, one of several key manager positions was left unfilled for more than four years; possibly leading to more pressure and responsibility for upper management in Code Enforcement. Key upper leadership was forced out near the end of 2024 due to the result of an HR investigation which was assigned to an outside law firm. As a result of these findings, the BOS issued an ultimatum to the key manager, which in turn forced the individual to resign. These events took place in mid-2024, but a replacement was not put into place until January 2025.

During the six months without key leadership, Code Enforcement was controlled by a subordinate to the key leadership position (who filed the charges against the previous key leadership), who assisted the interim leader with running the department from both an administrative and field operations position.

Upper management in TLMA explained the most recent choice for the key management of Code Enforcement was helping to promote a “change in culture.” The new leader came from outside of the County of Riverside and has no history with anyone in Code Enforcement. Therefore, this individual was not burdened with the alliances or prejudices of the past administration(s).

### **Communication Processes**

Many employees that the Grand Jury interviewed complained that everything has become a secret when it came to communication within the department. Not knowing the schedule or accessibility of a supervisor, why employees were being reassigned to different offices, or the reason behind specific departmental objectives created mistrust. Some of these changes were simply categorized as operational needs by management without explanation. Employees complained that there is little or no written correspondence, mostly verbal directives or emails are shared with the employees. Communication was also described as “one way” with lack of direction and less involvement overall.

In addition, Code Enforcement has a history of “working in silos.” With five remote offices and the administrative department working out of the CAC, it was mentioned in multiple interviews that each remote office has a history of setting its own agenda and direction. Interviews of employees, supervisors, and senior officers gave the Grand Jury an impression that information was primarily communicated to the front-line employees by “word of mouth.”

Leadership in Code Enforcement admitted to needing to work on more consistent communication at all levels and also admitted that visiting the field offices was lacking in consistency. While leadership has been characterized as approachable, they have also been criticized for managing the operation from behind a desk. Several employees commented that leadership “doesn’t know people” is “not actively involved,” and “doesn’t build relationships.”

The Grand Jury requested multiple times that Code Enforcement provide up-to-date Policies and Procedures for the department, but only received incomplete departmental Standard Operating Procedures.<sup>16</sup> Many of the employees that the Grand Jury interviewed admitted that they were not familiar with written Policies and Procedures for the Code Enforcement Department. The most current version of Code Enforcement Department Policy that this Grand Jury has access to is dated November, 24, 2010. Additionally, due to the extensive reorganization process in June of 2025, many employees confided in not receiving timely performance evaluations.

With the lack of written communication (memos or emails) from leadership, employees are unable to clearly follow job assignments and/or directives. This can cause confusion and accountability issues when these directives are not carried out accurately. Communication then becomes “one way” as employees do not have an avenue for a documented response when any potential questions arise.

### **Chain of Command**

The purpose of creating a chain of command within an organization is to create a structured, organized environment with clear reporting lines and decision-making authority. It can improve accountability, streamline communication, and boost employee morale.

When new leadership of Code Enforcement created a significant reorganization of the structure of the teams, the reorganization was done without consulting any of the existing Senior Code Enforcement Officers or the other members of upper management. Prior to these changes, upper management had to interact with many employees that were not in the proper chain of command and created situations that resulted in overlapping control. Employees complained that they were being “micromanaged or harassed” by an individual that was not their direct supervisor. One employee stated that they reported to three people, further complicating the true chain of command. On paper, the employee-supervisor dynamic should be very clear.

While new leadership had the latitude to make these changes and did so with the blessing of the TLMA, it created some confusion amongst the employees with respect to the chain of command within the department.

In mid-2025, an upper management position was filled to complete the hierarchy in the department. It was pointed out by several of the Supervising Code Officers and Senior Code Officers that the individual that was promoted to this position was not qualified and lacked experience for the position. Being new to the position and perhaps unsure of their responsibilities, one member of upper management continued to direct those under the other manager’s direct chain of command and authority. Other than filling in when one or the other is absent, neither of the managers should be directing employees other than those in their respective chain of command.

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<sup>16</sup> Code Enforcement Standard Operating Procedures (11/2025).

In respect to the areas of concern and the basis of the departmental findings the Grand Jury identifies the following findings and recommendations.

## **FINDINGS**

**F-1.** Evidence suggests that there is a perception that the culture between employees and management in Code Enforcement has resulted in abusive and retaliatory practices by management. These practices have been allowed to go unchecked by TLMA and HR as a result of downplaying internal complaints about upper management.

**F-2.** The Code Enforcement Policy Manual has not been updated to reflect information on how the employee complaint process functions. The current version of the Policy and Procedures manual falls short of including critical Board of Supervisor policies C-25, C-27, and C-35 information.

**F-3.** Possible violations of FMLA occurred when an employee was removed from a supervisory position in the field, had their work schedule substantially changed, and was reassigned to an undesirable location while they were out on FMLA leave.

**F-4.** There exists a biased promotional process within Code Enforcement that has been driven by a select few individuals. This process has been given silent approval because of outside relationships that influence the prepping of candidates, selecting the interviewing panel, and guiding the grading processes involved in departmental promotions. Additionally, there have been external communication with HR to manipulate certified hiring lists.

**F-5.** There are many instances of selective enforcement standards that may reflect outside influence from governing bodies within Riverside County. This creates an unequal playing field for most constituents of Riverside County by giving specific entities a different set of guidelines or allowances contrary to county ordinances.

**F-6.** Although the guidelines and standards from BOS policies for filing complaints are made available to all employees, many of these complaints (C-25, C-27, etc.) are not heard or taken seriously. The concerns of the employees have not been recognized or addressed by management due to an incomplete understanding of the HR process.

**F-7.** Undefined management-employee dynamics have created an uncertain hierarchy of leadership. Overlapping control, rather than a clearly defined chain of command, has created an environment of micromanagement.

**F-8.** The turnover at the director position in Code Enforcement has resulted in a culture of confusion and inconsistent direction. Strong, consistent leadership with a clear mission has been missing in the department for the past several years.

**F-9.** Clear, concise, and thorough communication has been lacking in Code Enforcement. Providing consistent written direction will avoid confusion and promote an aligned mission.

## **RECOMMENDATIONS**

**R-1.** Code Enforcement must take steps to comply with all directives and provisions of Board Policies C-25 and C-27 by taking initial complaints seriously and ensuring that all managers and supervisors take action.

Based on Finding: F-1

Implementation: Immediately

Fiscal Impact: None

**R-2.** The management team must update the Code Enforcement Policies and Procedures manual in accordance with R-1.

Based on Finding: F-2

Implementation: January 31, 2027

Fiscal Impact: None

**R-3.** All managers must complete FMLA compliance training and certification to promote awareness of employment law.

Based on Finding: F-3

Implementation: December 31, 2026

Fiscal Impact: Minimal

**R-4.** In order to promote an unbiased and neutral interview panel, it is recommended that interview panel members are chosen from a rotating pool of supervisory personnel by the director of the department. These personnel should reflect a blend of TLMA supervisors.

Based on Finding: F-4

Implementation: Immediately

Fiscal Impact: None

**R-5.** Consistent code enforcement standards must be applied to all constituents in Riverside County, regardless of political or monetary influences, to ensure equal treatment of all residents. Document all communications from other departments or elected officials which may affect the outcome of Code Enforcement duties involving ordinance compliance.

Based on Finding: F-5

Implementation: Immediately

Fiscal Impact: Minimal

**R-6.** Create an annual anonymous internal survey (Ex: Pulse Survey) to measure the employee experience and engagement within the Code Enforcement department. Actionable data can be shared at all levels to promote departmental growth, culture, and opportunities.

Based on Finding: F-6

Implementation: June 30, 2027

Fiscal Impact: Moderate

**R-7.** The director of Code Enforcement must establish a consistent schedule to visit district offices and meet with supervisors and employees to promote leadership, collaboration, and to reinforce the chain of command.

Based on Findings: F-7 and F-8

Implementation: Immediately

Fiscal Impact: None

**R-8.** In order to promote clear and consistent communication, any and all directives should be communicated, in writing, via e-mail or printed memo, and shared with employees at all levels, and in all district offices. In addition, all employees should be made aware of management schedules and availability.

Based on Finding: F-9

Implementation: Immediately

Fiscal Impact: None

**REQUIRED RESPONSES**

The governmental bodies are required to respond to the finding and recommendations listed below. According to California Penal Code §933, governing bodies have 90 days to respond, and agency heads have 60 days to respond. California Penal Code §933.05 specifies how responses should be structured.

<b>Governing Bodies</b>	<b>Findings</b>	<b>Recommendations</b>
County of Riverside Board of Supervisors	F-1—F-9	R-1—R-8

**INVITED RESPONSES**

The agency heads are invited, but not legally required, to respond to the findings and recommendations listed below.

<b>Agency Heads</b>	<b>Findings</b>	<b>Recommendations</b>
County of Riverside TLMA	F-1—F-9	R-1—R-8
County of Riverside Code Enforcement	F-1—F-9	R-1—R-8

County of Riverside Human Resources	F-4, F-6	R-4, R-6
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Reports issued by the Grand Jury do not identify individuals interviewed. Penal Code section 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Grand Jury.

Report Issued Date: 6-17-2026  
Report Public Date: 6-24-2026  
Response Due Date: 9-24-2026