CITY OF STOCKTON

RESPONSE TO THE 2025-2026 SAN JOAQUIN COUNTY CIVIL GRAND JURY

Stockton City Council - Governance in Turmoil

Case No. 0125

Prepared September 2026

Prepared for review prior to City Council adoption and submission to the Presiding Judge, San Joaquin County Superior Court.

Source report: 2025-2026 San Joaquin County Civil Grand Jury, "Governance in Turmoil," Case No. 0125, released June 2026.

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This draft incorporates the verbatim Findings F1-F9 and Recommendations R1-R8 from the Civil Grand Jury report. Final adoption date, resolution number, and any conforming legal revisions should be inserted by the City Attorney and City Clerk before submission.

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September 2026

The Honorable Lance G. Jacot, Presiding Judge
San Joaquin County Superior Court
180 E. Weber Avenue, Suite 1306J
Stockton, California 95202

Re: City of Stockton Response to 2025-2026 Civil Grand Jury Report, "Stockton City Council - Governance in Turmoil," Case No. 0125

Dear Judge Jacot:

On behalf of the City of Stockton, the Stockton City Council respectfully submits this response to the findings and recommendations contained in the 2025-2026 San Joaquin County Civil Grand Jury report entitled "Stockton City Council - Governance in Turmoil," Case No. 0125.

The City recognizes the important role of the Civil Grand Jury in reviewing the operation of local government and identifying circumstances that may impair public confidence, administrative efficiency, legal compliance, or institutional stability. The City takes the concerns raised in this report seriously.

Pursuant to California Penal Code sections 933 and 933.05, the City responds separately to each finding and recommendation. For each finding, the City states whether it agrees or disagrees wholly or partially and explains any disagreement. For each recommendation, the City uses the response category and implementation detail required by Penal Code section 933.05(b), including a summary of action already taken or a specific implementation timeframe.

The City's response is guided by four principles:

1. The City can acknowledge a governance problem without necessarily accepting every factual characterization, inference regarding motive, or conclusion concerning individual conduct contained in the report.
2. Disagreement among elected officials is not itself a failure of governance. The concern arises when disagreement interferes with lawful administration, staff operations, public confidence, workplace safety, or the orderly conduct of City business.
3. Corrective measures must respect constitutional and statutory protections. The City's reforms regulate governmental process and official conduct, not political viewpoints or lawful criticism.
4. Corrective action must be measurable. The City will maintain a Grand Jury and Governance Reset Implementation Matrix identifying the corrective action, responsible office, implementation vehicle, deadline, status, and public evidence of completion.

The City Council will adopt the final response in public session before submission. The adoption date and resolution number will be added by the City Clerk following Council action.

I. RESPONSES TO GRAND JURY FINDINGS

The following reproduces Findings F1 through F9 verbatim from pages 18-19 of the Civil Grand Jury report. The City's responses are structured to conform to Penal Code section 933.05(a).

FINDING F1
The very public conflicts among Council members have seriously undermined public faith in the Council's ability to conduct business transparently and professionally.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that sustained and highly public conflict among Councilmembers can diminish public confidence in municipal government and distract attention from the City's responsibility to provide services, make policy, and conduct public business professionally.

The City does not agree, however, that public disagreement itself necessarily constitutes a governance failure. Elected officials are independently elected and are expected to debate policy, question recommendations, scrutinize expenditures, and represent differing viewpoints.

The City's corrective objective is therefore not unanimity. It is to ensure that disagreement occurs within a professional, lawful, transparent, and institutionally responsible framework.

The Governance Reset addresses this concern through strengthened Council conduct standards, meeting procedures, complaint routing, staff protections, public communications standards, training, and measurable implementation reporting.

FINDING F2
In violation of City Charter Section 408, Stockton City Council has directly interfered with the duties and responsibilities of City staff. These actions have contributed to operational challenges within City government that will require additional time and resources to resolve.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees with the underlying governance principle that Stockton Charter Section 408 establishes important boundaries between the legislative role of the Mayor and Council and the administrative responsibilities of the City Manager and other Charter officers.

The City further agrees that individual elected officials shall not direct, discipline, pressure, threaten, or otherwise exercise administrative authority over employees who fall within the supervision of the City Manager or another Charter officer, except as authorized by the Charter.

The City disagrees with the finding to the extent it treats all Council interaction with City staff, or the conduct of the Council collectively, as established Charter violations without individualized factual analysis. Councilmembers retain legitimate authority to request information, raise constituent

concerns, ask policy questions, participate in authorized investigations, and exercise legislative oversight.

Whether a specific interaction constitutes prohibited interference depends upon the facts, the nature of the communication, and the applicable Charter authority. To eliminate ambiguity going forward, the City will implement a Council request-routing protocol, staff-contact procedures, Charter Section 408 training, escalation procedures, and a mechanism through which employees may report suspected improper direction without retaliation.

FINDING F3
Public records and media coverage indicate that the Stockton City Council has experienced ongoing internal conflict, including frequent disagreements, contentious meetings, and voting patterns that consistently divide the Council and lead to Council improprieties and the appearance of improprieties.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that repeated personal conflict, contentious meetings, and breakdowns in professional relationships can diminish public confidence and impede effective governance.

The City disagrees, however, with any implication that recurring divided votes or disagreement among elected officials, standing alone, constitutes an impropriety or evidence of an appearance of impropriety. A divided vote is a lawful exercise of legislative judgment, and a 4-3 decision is not less legitimate than a unanimous decision merely because the same elected officials may frequently take differing positions.

The relevant governance issue is the conduct surrounding disagreement, not the existence of disagreement itself. The City will strengthen objective standards governing meeting decorum, professional conduct, complaint routing, public accusations, use of official communications, and referral of alleged misconduct to appropriate processes.

FINDING F4
The Stockton City Council has attempted to bypass established protocols regarding fiscal matters, thus raising the possibility for further delays in the approval process and the possibility of the District Attorney's intervention.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that fiscal decisions shall comply with applicable Charter provisions, ordinances, procurement rules, budget authority, grant conditions, conflict-of-interest requirements, and established administrative procedures.

The City also agrees that the administrative record supporting significant expenditures, grants, contracts, and funding decisions should be transparent and sufficiently documented.

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The City disagrees that a Council decision differing from a staff recommendation necessarily constitutes an attempt to bypass fiscal protocols. The City Council retains legislative and budgetary discretion within the limits of law.

The Governance Reset will strengthen fiscal training, procurement and grant transparency, documentation of material deviations from staff recommendations, conflict certifications, public-benefit findings where appropriate, and procedures governing investigation expenditures and other significant discretionary spending.

FINDING F5
The Stockton City Council appears not to follow the ethics principles that are set forth in AB 1234, and the Stockton City Council Code of Conduct, which erodes public trust in the Council as a governing body.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that compliance with applicable ethics laws and the City's Code of Conduct is essential to maintaining public confidence.

The City further agrees that periodic statutory training alone is insufficient if elected officials do not have clear, accessible, and enforceable standards explaining applicable ethical responsibilities and the processes for addressing alleged violations. The City will implement City-specific training for Councilmembers that complies with the requirements of AB 1234 (Gov. Code § 53235) and applicable state law. The training will include the required ethics and transparency topics and will be tailored to the roles, responsibilities, and circumstances of Stockton City Councilmembers. Where appropriate, the training will also address City-specific policies, procedures, and legal requirements, including conflicts of interest, Brown Act and open meeting requirements, public records, appropriate use of City resources, and other issues that directly affect the Council’s governance responsibilities.

The City will establish a regular training schedule and maintain documentation of completion to ensure Councilmembers satisfy applicable statutory training requirements.

The City does not agree that the Grand Jury's generalized statement should be construed as a legal finding that every member of the City Council has violated AB 1234, the Political Reform Act, conflict-of-interest laws, or the City's Code of Conduct. Ethics violations must be evaluated according to the particular conduct, applicable legal standard, evidence, jurisdiction, and due-process requirements.

The City will expand its ethics framework, improve complaint routing, enhance training concerning conflicts of interest and public resources, establish clearer enforcement and referral procedures, and continue development of an independent Ethics and Accountability Commission or comparable body.

FINDING F6
The use of social media platforms (SMPs) and public forums such as press conferences to further personal agendas and air grievances is inappropriate.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that official communications, City resources, public forums conducted in an official capacity, and official social-media accounts must not be misused to retaliate against others, disclose confidential information, harass employees, violate the Brown Act, misuse public resources, or misrepresent personal political positions as official City action.

The City cannot agree, however, with a standard based solely upon whether speech is characterized as advancing a "personal agenda" or "airing grievances." Elected officials retain constitutional and statutory rights to criticize government policy, explain disagreements, communicate with constituents, hold press conferences, and express individual political viewpoints.

The City's policy response will therefore regulate objectively identifiable conduct and official-capacity activity rather than political viewpoint. The City will establish written social-media and public-communications standards addressing official versus personal speech, City branding, public resources, record retention, Brown Act compliance, confidentiality, account administration, and viewpoint-neutral moderation.

FINDING F7
The Stockton City Council has shown disrespect to City staff and communicated with staff in a manner contrary to Section 408 of the City Charter, contributing to a loss of skilled and professional employees and resulting in a substantial financial loss to the City.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that City employees must be treated professionally and must be able to perform their duties without improper political pressure, retaliation, intimidation, or administrative direction from individual elected officials.

The City further recognizes that employee turnover can impose significant costs through recruitment, training, severance obligations where applicable, loss of institutional knowledge, disrupted projects, and reduced organizational continuity.

The City does not accept without individualized factual analysis the conclusion that Council conduct or Charter Section 408 violations caused particular employee departures or particular financial losses. Personnel departures can involve multiple factors, many of which may concern confidential employment matters that the City cannot lawfully disclose in a public Grand Jury response.

The City's corrective response will focus on the institutional issue. The City will strengthen staff-contact protocols, anti-retaliation protections, Charter Section 408 training, complaint pathways, leadership accountability, retention analysis, and succession planning.

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FINDING F8
In their efforts to influence decisions made by the Stockton City Council, outside of Council chambers, some Council members have pursued personal agendas and advancement of business interests, thus compromising transparency.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that elected officials must comply with conflict-of-interest laws, campaign-finance requirements, restrictions on the use of public resources, disclosure obligations, procurement requirements, and other laws governing private interests and public decision-making.

The City also agrees that transparency is especially important when outside relationships, business interests, campaign activity, applicants, vendors, contractors, consultants, political organizations, or other private parties intersect with matters pending before the City.

The City does not agree that lawful political advocacy, communication outside Council chambers, association with private persons or organizations, or pursuit of policy objectives establishes improper conduct without additional facts. Nor does this response concede that any identified Councilmember possessed a legally disqualifying business interest unless established under applicable law.

The City's corrective approach will focus on disclosure, conflicts, contacts concerning qualifying City matters, campaign-finance compliance, lobbying and outside-influence transparency, public-resource restrictions, and appropriate recusals where legally required.

FINDING F9
The City of Stockton does not have an ordinance regarding limiting campaign contributions beyond state law, leading to a lack of transparency.

CITY RESPONSE: THE CITY AGREES IN PART WITH THE FINDING.

The City agrees that Stockton currently relies principally upon applicable state campaign-contribution law rather than a comprehensive local contribution-limit ordinance and agrees that the City should evaluate whether a local framework would improve transparency and public confidence.

The City disagrees to the extent the finding suggests that the absence of a local contribution limit necessarily creates an absence of campaign-finance transparency. State law already imposes substantial disclosure, reporting, contribution, and enforcement requirements.

Nevertheless, the City recognizes that a local ordinance may provide clearer Stockton-specific rules. The City will develop a local campaign-finance ordinance for Council consideration addressing contribution limits, aggregation, monetary and in-kind contributions, candidate-controlled committees, transfers, reporting, enforcement, indexing, and coordination with state law.

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II. RESPONSES TO GRAND JURY RECOMMENDATIONS

The following reproduces Recommendations R1 through R8 verbatim from pages 19-20 of the report. Each City response uses the statutory category required by Penal Code section 933.05(b) and supplies the summary or timeframe the Grand Jury expressly requests.

RECOMMENDATION R1
Within 90 days of the issuance of this report, the Stockton City Council should provide the Civil Grand Jury with written documentation detailing the actions taken to comply with the Stockton Council Policy Manual provisions governing member conduct, including standards applicable to meetings, public statements, online activity, professionalism, decorum, and mutual respect (F1, F3 and F5).

CITY RESPONSE: PENAL CODE § 933.05(b)(1): THE RECOMMENDATION HAS BEEN IMPLEMENTED.

The City is providing the requested written documentation through this formal response and the accompanying Governance Reset exhibits. The documentation identifies actions taken and underway to strengthen compliance with existing Council Policy Manual provisions governing member conduct, including meetings, public statements, online activity, professionalism, decorum, and mutual respect.

The documented actions include preparation of a comprehensive implementation matrix; strengthened Council governance and conduct standards; updated social-media and official-communications standards; review and proposed amendment of relevant Council Policy Manual provisions; Brown Act and closed-session procedures; Council/staff communication protocols; ethics and complaint-routing reforms; investigation-accountability procedures; procurement, grant, and fiscal-transparency reforms; and a public implementation and reporting framework.

Documentation supporting R1 is contained principally in Exhibits A, B, C, D, E, G, and K. Providing documentation does not mean that every underlying reform is complete. Each corrective action will remain tracked until completed or formally closed.

RECOMMENDATION R2
By December 31, 2026, all Stockton City Council members should complete formal training conducted by the City Manager on Charter Section 408, all Charter provisions governing Council conduct, and the requirements of the Stockton Council Policy Manual. Written verification of completion should be submitted to the Civil Grand Jury (F1, F3 and F5, F7).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts this recommendation and will complete the required training no later than December 31, 2026.

The City Manager, with assistance from the City Attorney and other qualified personnel where appropriate, will conduct or oversee formal training for all members of the Stockton City Council. The curriculum will include Charter Section 408; the respective legislative and administrative roles of the

City Council and City Manager; Charter provisions governing Council authority and conduct; Charter provisions governing investigations and interaction with City officers and employees; the Council Policy Manual; conduct and decorum requirements; permissible information requests and constituent-service activity; prohibited administrative direction; complaint and escalation procedures; and corrective processes associated with noncompliance.

Implementation deadline: December 31, 2026. Evidence of implementation will include the training agenda, materials, attendance record, and written verification of completion by each Councilmember. Written verification will be transmitted to the Civil Grand Jury as expressly requested.

RECOMMENDATION R3
By December 31, 2026, the Stockton City Council should receive training from the City Manager on established City policies and procedures governing fiscal matters, including the approval, funding, and oversight of City projects (F4, F7).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts this recommendation. The City Manager, working with the Chief Financial Officer, City Attorney, Procurement, Economic Development, and other appropriate departments, will provide formal training concerning established fiscal procedures.

The training will include budget and appropriation authority; approval and funding of City projects; fiscal impacts of Council actions; procurement procedures; competitive selection processes; grant and NOFA procedures; staff scoring and evaluation processes; Council discretion and documentation of departures from staff recommendations; conflicts of interest; use of public resources; contract approval; investigation expenditures; grant conditions and post-award oversight; and financial reporting and accountability.

Implementation deadline: December 31, 2026. Evidence of implementation will include training materials, agenda, attendance records, and written certification of completion.

RECOMMENDATION R4
By December 31, 2026, the Stockton City Council should demonstrate documented and measurable efforts toward establishing an Ethics Commission or similar body, including clear steps taken, draft frameworks, and publicly visible actions showing active development. The goal should be to formally establish and operationalize the Commission by January 2028 (F1, F5, F6, F7 and F8).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts this recommendation and will demonstrate documented and measurable progress toward creation of an independent Ethics Commission or legally comparable accountability body by December 31, 2026.

The development process will include review of comparable California ethics bodies; proposed jurisdiction; membership qualifications and appointment process; investigation and complaint-review authority; due-process and conflict safeguards; enforcement mechanisms; staffing, legal counsel, budget, and administrative support; jurisdiction over ethics, conflicts, campaign-finance provisions, lobbying, open-government requirements, and related local laws; identification of powers available by ordinance and any powers requiring Charter amendment; preparation of a draft framework; and public presentation of implementation progress.

Milestone deadline: by December 31, 2026, the City will have a publicly available framework, legal analysis, proposed structure, implementation pathway, and documented Council/public consideration. Operational goal: formal establishment and operation by January 2028, subject to legally required ordinance, Charter, budget, staffing, labor, and election processes. Exhibit G provides the initial implementation framework.

RECOMMENDATION R5

By December 31, 2026, the City Manager and City Attorney should rewrite and expand the City of Stockton Council Policy Manual Chapter 2.03: Code of Ethics for Elected Officials and Commissioners, to include more specific information and explanation of ethical behavior and action requirements (F1, F5, F6, F7 and F8).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts this recommendation. The City Manager and City Attorney will prepare amendments to Council Policy Manual Chapter 2.03 expanding the City's Code of Ethics for Elected Officials and Commissioners.

The revised chapter will address, as appropriate, fundamental ethical obligations of public office; AB 1234 requirements; Political Reform Act requirements; Government Code section 1090; common-law conflict principles; the Levine Act and other applicable contribution/conflict provisions; use of public resources; gifts, disclosures, and financial interests; recusal and disqualification; confidential information; Brown Act responsibilities; Public Records Act responsibilities; misuse of official position; improper administrative interference; retaliation; treatment of City employees; complaint intake and referral; due process; applicable enforcement authority; and referral to outside agencies where jurisdiction does not reside with the City.

Implementation deadline: December 31, 2026. Evidence of implementation will include draft and adopted amendments to Chapter 2.03, the associated staff report, legal review, and the publicly available final policy.

RECOMMENDATION R6

Effective upon publication of this report, members of the Stockton City Council, when speaking or posting in their official capacity or on matters related to City business, should refrain from using social media platforms or public forums to make disparaging or demeaning statements about fellow Council members or City staff (F1 and F6).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED IMMEDIATELY THROUGH FORMALIZED COUNCIL STANDARDS.

The City accepts the professional-governance objective of this recommendation. Upon adoption of this response, Councilmembers will be directed to adhere to an interim professional-conduct standard pending completion of the permanent written policy required by Recommendation R7.

When communicating in an official capacity or concerning City business, Councilmembers shall refrain from personal attacks and disparaging or demeaning statements directed toward fellow Councilmembers or City employees. Implementation will be consistent with constitutional protections and applicable law and is not intended to prohibit good-faith criticism of policy, disagreement with another elected official, criticism of official decisions, questioning of staff recommendations, disclosure of nonconfidential information, reporting suspected wrongdoing through lawful channels, or other legally protected speech.

Implementation timeframe: immediate upon Council adoption of this response. Permanent implementation: incorporated into the written guidelines required by R7 no later than December 31, 2026. Evidence of implementation will include adopted Council direction, revised conduct standards, and the final social-media/public-forum policy.

RECOMMENDATION R7

By December 31, 2026, the Stockton City Council should establish written guidelines regarding Council members' use of social media platforms and public forums in order to discuss City business and to maintain proper decorum (F1 and F6).

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN FULLY IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts this recommendation and will adopt written guidelines governing Councilmembers' use of social-media platforms and public forums when discussing City business.

The guidelines will address official versus personal communications; when an individual Councilmember is speaking for themselves rather than for the City Council; authorized City accounts; use of City seals, logos, titles, and branding; use of public resources; Brown Act considerations; public-record retention; closed-session and confidential information; interaction among Councilmembers on social-media platforms; official-account administration; moderation standards; personal attacks and professional decorum; communications concerning City employees; correction of inaccurate official information; cybersecurity and account credentials; and procedures for preserving and referring threatening, harassing, or potentially unlawful communications.

Implementation deadline: December 31, 2026. Evidence of implementation will include the adopted policy, official-account inventory, written guidance, training materials, and implementation records. Exhibit E provides the initial policy framework.

RECOMMENDATION R8

By December 31, 2027, the Stockton City Council should establish their own ordinance limiting campaign contributions by individuals and organizations in city elections as exampled by San Francisco, Oakland and Los Angeles. This ordinance should include all monetary, in kind and campaign committee contributions. This will allow public transparency in campaign finances. (F9)

CITY RESPONSE: PENAL CODE § 933.05(b)(2): THE RECOMMENDATION HAS NOT YET BEEN IMPLEMENTED BUT WILL BE IMPLEMENTED.

The City accepts the recommendation to establish a local campaign-contribution ordinance. The City Attorney, City Clerk/elections personnel, and other appropriate staff will prepare an ordinance for Council consideration establishing local contribution limits consistent with federal and California law.

At a minimum, the ordinance-development process will address contributions by individuals and organizations; monetary and in-kind contributions; candidate-controlled committees; campaign-committee contributions and transfers; aggregation rules; loans; returned contributions; contribution limits applicable to each election; reporting and disclosure; enforcement; administrative responsibilities; applicable penalties; indexing if appropriate; interaction with state campaign-finance law; and effective-date and transition provisions.

The City will review relevant provisions from San Francisco, Oakland, Los Angeles, and other appropriate California jurisdictions while developing a Stockton-specific ordinance. Implementation deadline: December 31, 2027. Interim milestones will include legal and comparative review, a draft framework, public review, Council consideration, administrative and enforcement procedures, and candidate/public education sufficiently in advance of the first election governed by the ordinance. Evidence of implementation will include the adopted ordinance, implementation guidance, public contribution-limit information, election materials, and identified enforcement procedures.

STATUTORY COMPLIANCE AND FOLLOW-THROUGH

For each recommendation that the City states will be implemented in the future, the City has identified a specific implementation timeframe as required by California Penal Code section 933.05(b)(2). The City will maintain the Grand Jury/Governance Reset Implementation Matrix as the official tracking mechanism for Recommendations R1 through R8.

Where implementation requires Council adoption, legal review, labor review, budget authorization, ordinance adoption, voter approval, or another legally required process, those requirements will be identified in the matrix. Such requirements do not eliminate the City's commitment to implementation. If circumstances later make a recommendation legally unavailable or unreasonable to implement in the form contemplated by the Grand Jury, the matter will return to the City Council for a public status determination explaining the impediment and, where possible, identifying a lawful alternative addressing the underlying governance concern.

The City will preserve written evidence of completion and will provide additional verification to the Civil Grand Jury where specifically requested, including written verification of Councilmember training required by Recommendation R2.

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III. CORRECTIVE ACTION AND GOVERNANCE RESET

The City believes the most effective response to the Civil Grand Jury is not a single filing but an institutional process that continues after this response is submitted. Accordingly, the City will use its Governance Reset framework to coordinate the corrective work described above.

The framework includes Council conduct and meeting standards; governance protocols defining the respective responsibilities of elected officials and Charter officers; Brown Act and closed-session compliance; staff-protection and Charter-compliance procedures; social-media and public-communications standards; ethics and complaint-routing reforms; investigation authorization and expenditure controls; procurement and grant transparency; workplace-safety procedures; campaign-finance review; and public implementation reporting.

Corrective measures will be assigned to the appropriate legal vehicle. Some may be accomplished administratively. Others may require amendment of Council policy, adoption of a resolution or ordinance, labor review, budget authorization, contract amendment, or voter approval of a Charter amendment.

No corrective measure will be treated as effective merely because it has been announced. Completion will require an identifiable policy, action, training record, adopted legislative instrument, administrative procedure, or other evidence that can be reviewed by the public to the extent permitted by law.

IV. RESPONSE TO PRIOR GRAND JURY FOLLOW-UP CONCERNS

The City acknowledges the Grand Jury's concern that prior City responses did not consistently provide the finding-by-finding and recommendation-by-recommendation treatment required by Penal Code section 933.05. This response is structured specifically to correct that deficiency.

In addition to the responses contained in this document, the City will incorporate unresolved recommendations from prior Civil Grand Jury reports into the public implementation matrix and identify whether each matter has been completed, remains in progress, requires additional analysis, has been superseded, or will not be implemented for a stated legal or policy reason.

This commitment does not constitute agreement with every prior finding or recommendation. Recommendations touching political speech, association, media relationships, or other constitutionally protected activity must be interpreted and implemented consistently with the United States Constitution, California Constitution, and applicable state and federal law.

Where conduct is independently unlawful or prohibited by valid City policy, the City will address that conduct. Where activity consists of lawful political speech, criticism, association, advocacy, or participation in government, the City will respect the rights of the speaker and respond through lawful governmental processes.

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V. ACCOUNTABILITY AND PUBLIC REPORTING

The City will maintain a public implementation matrix following submission of this response.

Progress reports will identify completed actions, actions in progress, items awaiting Council action, matters undergoing legal or labor review, delayed actions and the reason for delay, and any recommendation that ultimately requires voter approval or action by another governmental agency.

The City intends to provide periodic public updates until the corrective actions arising from this report have been completed or formally closed. The purpose is straightforward: the City's response to the Civil Grand Jury should be demonstrated by what changes are in practice, not merely by what is written in this response.

VI. CONCLUSION

The Civil Grand Jury's report describes serious concerns about the operation of Stockton City government. The City does not accept every characterization in the report, and this response should not be interpreted as an admission of unlawful conduct by any elected official, employee, Charter officer, or other individual except where expressly stated.

The City nevertheless accepts the larger responsibility identified by the Grand Jury. Stockton residents are entitled to a City government in which elected officials can disagree without disabling the institution; professional employees can perform their duties without improper interference; allegations are reviewed through fair and consistent processes; public funds are spent transparently; investigations have defined purposes and controls; ethics expectations are understandable and enforceable; and government remains accountable to the public it serves.

The City's objective is therefore not simply to respond to the report. It is to use the report to establish clearer rules, stronger institutions, measurable accountability, and a governance structure capable of enduring beyond the individuals presently holding office.

Respectfully submitted,

CITY OF STOCKTON

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Christina Fugazi, Mayor

Attest:

_____

City Clerk / Acting City Clerk

Approved as to form:

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Donald Larkin, Interim City Attorney

Council adoption date and resolution number to be entered by the City Clerk upon final Council action.

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EXHIBIT A
GRAND JURY / GOVERNANCE RESET IMPLEMENTATION MATRIX

Purpose
This matrix serves as the City's central public accountability document for implementation of the Civil Grand Jury response and related Governance Reset reforms. The City Clerk, in coordination with the City Attorney and City Manager, will maintain the matrix and update it after material action occurs. The public version will exclude privileged, confidential, personnel-related, security-sensitive, or otherwise protected information.

Required Fields
1. Grand Jury finding or recommendation number.
2. Subject matter.
3. City's statutory response.
4. Corrective action.
5. Responsible office.
6. Supporting legal or policy authority.
7. Required implementation vehicle.
8. Target date.
9. Current status.
10. Public evidence of completion.
11. Legal, fiscal, labor, operational, or Charter dependency.
12. Revised completion date, if applicable.
13. Closure determination and date.

Initial Implementation Matrix

ID	Issue	Corrective Action	Lead	Target	Public Proof
GJ-01	Public conflict and confidence	Adopt governance and conduct standards; training; public dashboard	Mayor / City Attorney / City Clerk	0-60 days	Resolution, training record, dashboard
GJ-02	Meeting decorum	Update objective meeting rules and presiding-officer procedures	City Attorney / City Clerk	0-60 days	Adopted rules, chair protocol
GJ-03	Social media/public forums	Adopt official communications and social-media standards	City Attorney / PIO / City Clerk	By Dec. 31, 2026	Policy, account inventory, training

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ID	Issue	Corrective Action	Lead	Target	Public Proof
GJ-04	Brown Act/closed session	Refresher training, confidentiality acknowledgment, social-media guidance and referral procedures	City Attorney / City Clerk	0-90 days	Training certificates, acknowledgments, quick guide
GJ-05	Staff interference	Establish Council request-routing and staff-contact protocols	City Manager / City Attorney / HR	0-90 days	Written protocol, referral log, training
GJ-06	Workplace safety	Align threat, harassment and abusive-communication procedures with existing safety requirements	HR / Risk Management / City Attorney	0-120 days	Intake process, referral protocol, training
GJ-07	Ethics and complaints	Strengthen ethics rules and create neutral complaint triage	City Attorney / City Manager / HR	By Dec. 31, 2026	Ethics package, routing chart
GJ-08	Investigations	Implement written authorization, scope, budget, conflict and closeout controls	City Attorney / City Manager / CFO	0-120 days	Authorization form, policy, cost report
GJ-09	Procurement/grants	Require enhanced documentation for material deviations and conflicts	City Manager / CFO / Procurement	0-120 days	Forms, deviation memorandum template
GJ-10	Independent ethics oversight	Develop framework and legal implementation pathway	City Attorney	By Dec. 31, 2026	Public framework and staff report
GJ-11	Campaign finance	Prepare local contribution-limit ordinance	City Attorney / City Clerk / Elections	By Dec. 31, 2027	Draft/adopted ordinance

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ID	Issue	Corrective Action	Lead	Target	Public Proof
GJ-12	Staff morale/retention	Review turnover, vacancy, succession and institutional-knowledge risks	City Manager / HR	0-180 days	Aggregate report and retention measures
GJ-13	Prior Grand Jury items	Inventory and close out unresolved prior recommendations	City Clerk / City Attorney	0-120 days	Prior-report crosswalk
GJ-14	Final reporting	Publish consolidated Governance Reset implementation report	City Manager / City Clerk	Day 200	Public report

STATUS DEFINITIONS

Not Started: Assigned but substantive work has not begun.
In Review: Legal, administrative, fiscal, labor, or operational analysis is underway.
Drafted: A policy, ordinance, resolution, procedure, or other corrective instrument has been prepared but has not yet received final approval.
In Implementation: Final authority has been obtained and operational implementation is underway.
Completed: Required corrective action has been implemented, and public proof of completion is available.
Closed - Alternative Action: The original recommendation was addressed through a legally permissible alternative achieving substantially the same objective.
Closed - Not Implemented: The City Council has formally determined that implementation is not warranted, reasonable, legally available, or within City authority and has stated the basis for that determination.

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EXHIBIT B
COUNCIL GOVERNANCE AND CONDUCT POLICY FRAMEWORK

Purpose
The Council Governance and Conduct framework establishes uniform rules governing professional conduct by the Mayor and Councilmembers while preserving vigorous policy disagreement, public criticism, minority viewpoints, constituent advocacy, and other protected activity.

Core Standards

- Conduct City business professionally and with due regard for the institutional interests of the City.
- Debate the merits of policy rather than use City processes primarily to pursue personal disputes.
- Respect authority assigned by Charter to the City Manager, City Attorney, City Clerk, City Auditor, and other Charter officers.
- Avoid directing subordinate City employees unless expressly authorized by Charter, ordinance, policy, or the responsible Charter officer.
- Route allegations of wrongdoing through the appropriate complaint, ethics, legal, Human Resources, workplace-safety, law-enforcement, or administrative process.
- Protect confidential and privileged information as required by law.
- Comply with the Brown Act and applicable conflict-of-interest requirements.
- Refrain from retaliation against employees, complainants, witnesses, residents, contractors, or other persons for legally protected activity.
- Avoid use of City staff, resources, logos, facilities, accounts, or equipment for impermissible political purposes.
- Distinguish personal or campaign communications from official City communications where confusion is reasonably likely.
- Meeting Decorum
- The presiding officer should apply meeting rules neutrally and consistently. Corrective steps may include a request for voluntary compliance, statement of the applicable rule, warning where legally appropriate, recess, consultation with the City Attorney, or other action authorized by law or Council rules. No meeting rule should be applied to suppress criticism because of viewpoint.
- Allegations Against Officials or Employees
- A serious allegation should be routed to the office with lawful jurisdiction rather than adjudicated through an unscheduled public accusation. The referral process should identify the nature of the allegation, reviewing authority, confidentiality status, recusal or conflict issues, need for outside review, and appropriate public reporting after disposition.
- Violations and Corrective Measures
- Potential responses depend upon legal authority and may include education, corrective counseling, referral, public clarification, censure procedures, removal from an appointed committee where legally permissible, or referral to an outside enforcement agency. This framework does not create removal, suspension, monetary-penalty, or other enforcement powers that the City does not possess under its Charter or applicable law.

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Annual Review

The City Attorney and City Clerk should review the policy annually and recommend amendments when changes in law, recurring disputes, or implementation experience show that clarification is necessary.

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EXHIBIT C
CHARTER AND COUNCIL-MANAGER GOVERNANCE PROTOCOL

Governing Principle
The City Council establishes policy. Charter officers and professional staff administer City government within the authority assigned to them by the Charter, Municipal Code, Council policy, contracts, personnel rules, and applicable law. Legitimate oversight must be preserved without converting individually elected officials into administrative supervisors.

Permissible Council Activity

- Request information concerning City operations.
- Ask questions of the City Manager and Charter officers.
- Request status information on constituent matters.
- Submit agenda referrals and propose policy changes.
- Question expenditures and staff recommendations.
- Communicate constituent concerns.
- Seek legal advice through authorized channels.
- Advocate publicly for or against policy decisions.
- Administrative Direction
- Except where specifically authorized, individual Councilmembers shall not hire, discipline, threaten, evaluate, or direct subordinate employees; order staff to initiate or cease operational activity; direct procurement or grant-selection outcomes; require alteration of professional findings outside the lawful decision-making process; interfere with personnel investigations; or use administrative access to obtain preferential treatment for private or political interests.
- Council Request Routing
- Routine informational requests should be transmitted through the City Manager, designated executive staff, or another Charter officer with jurisdiction. The City Manager may establish reasonable procedures for response deadlines, workload management, department assignment, duplication, emergency requests, and requests involving confidential or privileged information. A centralized Council Request Log may record the date, requester, general subject, assigned office, completion status, and workload impact without publicly disclosing protected information.
- Constituent Services
- Councilmembers remain free to assist constituents. A Councilmember may bring a constituent problem to the attention of the appropriate City official but shall not promise a particular administrative outcome or personally direct subordinate staff to provide preferential treatment.
- Disputed Contacts and Escalation
- When an employee believes an elected official has crossed the line from inquiry into administrative direction, the employee must be able to refer the matter, without retaliation, to a supervisor, department director, City Manager, Human Resources, City Attorney, or other designated channel. Repeated or significant concerns must be documented and reviewed. Potential responses may include clarification of authority, counseling or training, written notice, referral to the City Attorney, referral to an ethics process, or Council consideration under applicable conduct or censure procedures.
- Protection Against Retaliation

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- No employee or official shall be subjected to retaliation for making a good-faith report through an authorized process. Nothing in this protocol limits rights under applicable whistleblower, labor, discrimination, employment, or other law.

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EXHIBIT D
BROWN ACT AND CLOSED-SESSION COMPLIANCE PLAN

Training
Periodic Brown Act training should address meeting and agenda requirements; serial meetings; communications among Councilmembers; electronic communications; social-media interaction; public-comment rights; permissible closed-session subjects; reporting out of closed session; confidentiality obligations; and remedies and consequences of noncompliance.

Closed-Session Acknowledgment
Councilmembers and other authorized attendees shall receive a written explanation of closed-session confidentiality obligations and acknowledge receipt. The acknowledgment should clarify that confidentiality rules protect the City's lawful decision-making process and do not prohibit disclosures expressly authorized by law.

Electronic and Social-Media Guidance
The City Attorney shall prepare a concise guide addressing conduct that can unintentionally create a serial meeting, including replies, comments, group messaging, intermediary communications, and coordinated online interaction.

Leak or Unauthorized Disclosure Protocol
When a suspected unauthorized disclosure occurs, preserve relevant evidence; determine whether the information was legally confidential; determine which office has jurisdiction; avoid public accusations before sufficient facts are established; preserve privilege and due process; refer potentially criminal conduct when warranted; and provide lawful public closeout information when appropriate.

Meeting Support
For high-risk or complex agenda items, the City Attorney and City Clerk will provide pre-meeting procedural guidance regarding motions, recusals, public comment, closed-session boundaries, or other identified compliance concerns.

Proof of Implementation
Evidence may include training records, signed acknowledgments, written legal guidance, revised Council policies, compliance checklists, and aggregate reports regarding corrective measures.

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EXHIBIT E
SOCIAL MEDIA AND PUBLIC COMMUNICATIONS POLICY

Scope
The policy shall distinguish among official City accounts; accounts maintained by elected offices using City resources; personal accounts used to conduct City business; campaign or purely personal accounts; and City websites, newsletters, and electronic communications.

Official Accounts
Official City accounts must be used for legitimate public purposes; maintain appropriate records; follow approved branding and security procedures; identify authorized publishers; preserve records consistent with applicable requirements; and avoid campaign advocacy or prohibited political use of public resources.

Personal Accounts Used for City Business
Officials shall avoid conducting City business through purely personal channels when an official channel is reasonably available. Where City business occurs through a personal account or device, applicable public-record and retention obligations should be followed.

Distinction Between Official and Personal Speech
The City shall use clear disclaimers where necessary to reduce confusion over whether statements represent official City policy, an individual elected official, campaign activity, or personal political opinion.

Brown Act Compliance
Councilmembers must not use social media to engage in prohibited collective deliberation or serial discussion of City business.

Moderation
Any moderation of an official interactive account shall be governed by written, viewpoint-neutral rules reviewed by the City Attorney. The policy should distinguish protected criticism from objectively defined categories that may lawfully be moderated.

Threats, Harassment and Doxxing
Potential threats or unlawful harassment must be preserved and routed to the appropriate safety, Human Resources, law-enforcement, legal, or risk-management process. Offensive, hostile, or sharply critical speech does not alone establish unlawful conduct.

Records Preservation
The City must maintain appropriate preservation mechanisms for official-account content and City-business communications.

Account Inventory and Security
The City must maintain an inventory of official accounts identifying platform, responsible office, account owner, authorized publishers, recovery information, credential custody, and archival method.

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Training

Authorized publishers and elected officials shall receive periodic training covering records, Brown Act considerations, cybersecurity, City branding, political-use restrictions, moderation, and protected speech.

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EXHIBIT F
INVESTIGATION ACCOUNTABILITY PROTOCOL

Purpose
The City shall preserve its ability to investigate legitimate allegations while reducing the risk of open-ended, duplicative, retaliatory, politically driven, or fiscally uncontrolled investigations.

Classification
Before initiation, the reviewing authority shall determine whether the matter is primarily personnel, workplace/HR, ethics, Brown Act, legal/claims, fraud or misuse of funds, procurement, workplace safety, law enforcement, administrative, Council-authorized, or otherwise required by statute, Charter, contract, insurance, or regulation.

Written Authorization
1. Authorizing authority.
2. Legal or policy basis.
3. Public purpose.
4. Factual basis sufficient to justify review.
5. Scope.
6. Investigator or investigating entity.
7. Estimated budget.
8. Funding source.
9. Expected timeline.
10. Reporting structure.
11. Confidentiality requirements.
12. Conflict-of-interest review.
13. Conditions requiring amendment or additional authorization.

Scope Expansion and Budget Controls
Material scope expansion shall require written justification and appropriate authorization, including newly discovered facts, additional issues, expected cost, additional time, and conflict implications. The authorization shall establish a budget or reasonable estimated range, and material deviations should be reported to the official or body with appropriate fiscal authority.

Conflict Review
Potential investigators must disclose circumstances that could reasonably raise questions concerning independence. Conflicts involving the requesting party, subject, witness, investigator, City Attorney, City Manager, Councilmember, or other decisionmaker should be addressed before assignment where practicable.

Duplicate Investigations
Before authorizing a substantially duplicative investigation, the City shall document why an existing or prior review is insufficient and identify materially new evidence or a distinct legal purpose justifying additional expenditure.

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Confidentiality, Closeout and Public Reporting

Nothing in this protocol requires disclosure of privileged legal advice, personnel information, confidential witness information, protected investigative material, law-enforcement information, or other exempt records. Where legally permissible, closeout records shall identify the general issue, authority, status, aggregate cost, disposition category, and policy recommendations, with lawful aggregate public reporting.

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EXHIBIT G
ETHICS AND ACCOUNTABILITY ROADMAP

Phase One - Strengthen Existing Rules
The City Attorney shall identify existing ethics, conduct, conflict, disclosure, censure, complaint, and enforcement provisions and recommend amendments where rules are unclear, duplicative, or lack an identifiable enforcement path.

Complaint Classification

- Ethics.
- Conflict of interest.
- Brown Act.
- Staff interference.
- Misuse of public resources.
- Workplace harassment or discrimination.
- Retaliation.
- Workplace safety.
- Procurement.
- Campaign finance.
- Lobbying or outside influence.
- Criminal conduct.
- Matters outside City jurisdiction.
- Neutral Intake and Triage.

The City shall provide at least one reliable complaint intake method that does not require a complainant to submit an allegation directly to the person accused. Initial review should determine jurisdiction, whether the allegation states a potential violation, whether immediate safety action is required, appropriate routing, conflicts, and confidentiality measures.

Anti-Retaliation
The ethics system must expressly preserve statutory and contractual anti-retaliation protections and provide a route for reporting suspected retaliation.

Independent Ethics & Accountability Commission Development
Consistent with Recommendation R4, the City must develop a publicly available framework by December 31, 2026, and pursue formal establishment and operation by January 2028. The framework should address membership qualifications, appointment process, staggered terms, removal protections, budget independence, legal counsel, complaint jurisdiction, investigatory authority, hearing procedures, administrative enforcement, fines or remedies if legally authorized, advisory opinions, training, lobbying oversight, campaign-finance oversight, open-government jurisdiction, appeal rights, judicial review, and any Charter amendment requirements.

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Structural Limitation

An ethics body shall not acquire general administrative control over departments or authority to remove elected officials unless that authority is expressly and lawfully created. Serious matters outside local jurisdiction should be referred to the agency possessing lawful enforcement authority.

Public Reporting

The ethics framework shall provide aggregate reporting of complaints received, jurisdictional dispositions, referrals, completed investigations, advisory opinions, and other measurable information while protecting legally confidential material.

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EXHIBIT H
FISCAL, PROCUREMENT AND GRANT TRANSPARENCY PROTOCOL

General Principle
The Council retains lawful policy and budget discretion. Transparency is especially important when the Council chooses a materially different outcome from an objective staff scoring process, competitive selection, professional recommendation, or established funding methodology.

Required Administrative Record

1. For qualifying matters, the record shall identify amount and funding source; purpose; recipient or contractor; selection process; scoring or evaluation criteria where applicable; conflict certifications; staff recommendation; Council action; material deviation from the recommended outcome; fiscal effect; and public benefit supporting the final action.
2. Deviation Memorandum
   When legally appropriate, a material departure from a competitive or scored staff recommendation shall be accompanied by a concise public explanation identifying the policy basis for the different outcome. This requirement does not eliminate the Council's legislative discretion.
3. Conflict Certification
   Participants in qualifying procurement or grant evaluations should disclose actual or potential conflicts in accordance with applicable law and City policy.
4. Grant Awards
   For competitive City grant programs, the City shall publish, where appropriate, eligibility requirements, scoring criteria, application period, evaluation process, award recommendations, and final awards.
5. Procurement
   The protocol shall establish documentation expectations when competitive procedures are waived, exceptions are invoked, or Council selects an alternative to a staff recommendation.
6. Investigation Expenditures
   Investigation costs must be tracked separately or in a manner permitting appropriate aggregate reporting.
7. Public Resources
   Nothing in this protocol authorizes expenditure of public resources for campaign or private political purposes.
8. Annual Review
   Procurement and finance staff shall periodically identify recurring exceptions, waivers or deviations and recommend policy changes where patterns demonstrate a need for clarification.

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EXHIBIT I
CAMPAIGN FINANCE ORDINANCE WORK PLAN

Objective
The City will prepare a locally enforceable campaign-contribution framework designed to promote transparency, reduce ambiguity, and increase confidence in municipal elections without infringing protected political participation.

- Legal Review
- State-law contribution limits applicable to local candidates.
- Charter authority.
- Preemption.
- First Amendment requirements.
- Due-process requirements.
- Enforcement authority.
- Recordkeeping and reporting.
- Interaction with FPPC jurisdiction.

Policy Issues for Council Determination

1. Contribution limit per election.
2. Treatment of candidate, controlled committee, and other contributor categories.
3. Aggregation of affiliated contributors where authorized.
4. Loans.
5. In-kind contributions.
6. Candidate personal funds.
7. Transfers between candidate-controlled committees.
8. Contributions from other candidate committees.
9. Returned contributions.
10. Election-cycle definitions.
11. Indexing for inflation.
12. Disclosure requirements.
13. Late-contribution rules.
14. Enforcement.
15. Administrative remedies and penalties within lawful authority.
16. Statute of limitations.
17. Effective date and transition rules.

Contribution-to-Decision Safeguards
The ordinance review shall separately address existing state conflict and contribution rules applicable to certain governmental proceedings so that local rules do not create contradictory obligations.

Public Review
Before adoption, the City shall provide a public draft, legal memorandum, comparison with relevant California charter cities, fiscal/enforcement analysis, and opportunity for public comment.

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Enforcement

The City shall identify an enforcement model before adoption. Potential models include City Attorney enforcement, City Clerk administration, an independent hearing officer, future Ethics Commission jurisdiction, or referral to the FPPC or another state authority.

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EXHIBIT J
PRIOR GRAND JURY RECOMMENDATION CLOSEOUT MATRIX

Purpose
The City shall conduct a retrospective review of outstanding recommendations arising from prior Civil Grand Jury reports concerning Stockton governance to eliminate uncertainty about whether an item was implemented, superseded, remained pending, or was rejected for a stated reason.

Required Review
1. Grand Jury year.
2. Case/report number.
3. Finding or recommendation number.
4. Original recommendation.
5. City's original response.
6. Action subsequently taken.
7. Current governing policy, ordinance, Charter provision, administrative procedure, or practice.
8. Current implementation status.
9. Remaining action, if any.
10. Public evidence.
11. Legal impediment or superseding law, if applicable.
12. Closure determination.

Response Categories
1. Completed.
2. Completed through alternative action.
3. Partially completed - additional action underway.
4. Requires renewed legal or administrative analysis.
5. Superseded by later law or policy.
6. Not implemented - reason stated.

Priority Subjects
1. Outside influence and elected-official conduct.
2. Threatening or abusive communications.
3. Brown Act compliance.
4. Closed-session confidentiality.
5. Reporting of investigation findings.
6. Ethics Hotline procedures.
7. Staff interference.
8. Council conduct.
9. Expenditure of public funds.
10. Transparency and accountability.
11. Constitutional and Legal Review

Any prior recommendation affecting protected speech, association, media interaction, political activity, public participation, or other constitutional rights should be reviewed by the City Attorney before implementation. The City should distinguish between unlawful conduct and protected activity.

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Unresolved prior recommendations shall be incorporated into the Governance Reset Implementation Matrix, with a public closeout report identifying completed, pending, superseded, and not-implemented items and the reasons for each status.

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EXHIBIT K
IMPLEMENTATION AND REPORTING CALENDAR

Days 0-30

- Finalize and publish the Grand Jury Response Matrix.
- Complete Governance Reset legal crosswalk.
- Prepare Council Governance and Conduct Resolution.
- Identify outstanding prior Grand Jury recommendations.
- Inventory official social-media accounts.
- Issue initial Council-manager governance guidance.

Days 31-60

- Present or adopt Council conduct reforms.
- Complete Brown Act/closed-session refresher materials.
- Launch Council request-routing procedures.
- Create public implementation dashboard.
- Complete initial Charter-role training.
- Prepare social-media policy draft.

Days 61-90

- Implement complaint-routing framework.
- Complete investigation-control policy.
- Establish standard investigation authorization form.
- Complete procurement/grant transparency draft.
- Establish workplace-safety and threatening-communications referral protocol.
- Advance ethics-code revision and Ethics Commission framework.

Days 91-120

- Apply investigation controls to qualifying new matters.
- Implement procurement/grant documentation standards.
- Publish initial aggregate compliance information where legally permissible.
- Complete prior Grand Jury closeout review.
- Present Ethics Commission structural framework if ready.

Days 121-150

- Review effectiveness of Council request-routing and staff-contact procedures.
- Publish implementation status report.
- Complete additional Council/leadership training.
- Identify policy changes requiring ordinance, budget, labor process, or Charter amendment.

Days 151-200

- Publish aggregate investigation expenditure/status information where legally permissible.
- Complete staff morale, retention and institutional-knowledge review.
- Present campaign-finance ordinance work plan.
- Present ethics/accountability implementation path.
- Issue consolidated Governance Reset Implementation Report.
- Continuing Obligations
- Complete all R2, R3, R4, R5, and R7 milestones by December 31, 2026.
- Continue development toward an operational Ethics Commission or comparable body by

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January 2028.
Adopt a local campaign-contribution ordinance by December 31, 2027.
Report unfinished items at least quarterly until completed or formally closed.

No missed internal target automatically terminates a reform item. Where a deadline cannot reasonably be met because of legal review, meet-and-confer obligations, election requirements, fiscal analysis, procurement, Charter amendment procedure, or another legitimate dependency, the responsible office should identify the reason, revised date, and next required action. Statutory or Grand Jury deadlines should not be extended without legal review and an appropriate public response.

FINAL IMPLEMENTATION AND LEGAL CONFORMITY STATEMENT

These exhibits are intended to function as an implementation framework and not merely as statements of aspiration. Nothing in this response or its exhibits should be interpreted to diminish authority assigned by the Stockton City Charter; create enforcement authority the City does not otherwise possess; waive attorney-client privilege, attorney work product, personnel confidentiality, privacy rights, labor rights, or statutory exemptions; prohibit constitutionally protected speech, criticism, association, public participation, petition, journalism, advocacy, or political activity; interfere with lawful whistleblower activity; or prevent any official from referring reasonably suspected criminal or regulatory violations to an agency with lawful jurisdiction.

Where a provision of this response conflicts with controlling federal law, California law, the Stockton City Charter, or a binding labor agreement, the controlling authority governs and the City should modify the implementation mechanism while preserving the underlying corrective objective to the greatest lawful extent.

The City Attorney is requested to make any conforming legal revisions necessary before final Council adoption and submission to the Presiding Judge.

SOURCE NOTE

Verbatim Findings F1-F9 and Recommendations R1-R8 are reproduced from the 2025-2026 San Joaquin County Civil Grand Jury report, “Stockton City Council - Governance in Turmoil,” Case No. 0125, pages 18-20. The report states the required response categories under California Penal Code section 933.05 on pages 22-23 and identifies the City’s response as due within 90 days from receipt of the report.

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