



Date: June 24, 2026

To: Honorable Mayor and Members of the City Council

From: Glen R. Googins, City Attorney and Sujata Reuter, Chief Assistant City Attorney

Subject: Conflicts Review – Civil Service Commission Applicants

Honorable Mayor and Councilmembers:

The City Attorney's Office has been asked to review the applications for the Civil Service Commission and to advise on whether any of the applications reflect any legal issues that would affect the Council's appointment process. Generally speaking, applications alone do not provide complete information regarding potential conflicts; however, they do occasionally disclose potential conflicts of interest or incompatible offices. The purpose of this memorandum is to highlight areas of potential conflict, if any, that are disclosed by the applications. This review is limited solely to the information provided on the applications and is not intended to be comprehensive investigation of potential conflicts involving the applicants. A commissioner may be precluded from participating in certain matters of Commission business if the commissioner has a personal financial interest in that matter. While this list is not complete, these types of conflicts generally fall within one or more of the following situations:

- An application shows persons or entities that are "sources of income" to an Applicant within the 12 months preceding the start of the commission term, as defined under the Political Reform Act, which may create a conflict either with a member of the Council acting in the appointing capacity or potentially with the business of the Commission;
- An Applicant is an officer or employee of a person or entity that could be involved in a matter coming before the Commission; or
- An Applicant engages in a profession serving the local market that is likely to realize financial benefits or detriments, distinguishable from the public generally, that would result from the work performed by the Commission.

There may be facts which would not amount to a legal conflict of interest requiring a commissioner to recuse him- or herself from a commission vote or discussion, however the relationship could create an appearance of bias on the part of the commissioner. The City's Code of Ethics and Values requires that Commissioners "make impartial decisions, free of . . . financial and other personal interests that impair [one's] independence of judgment or action." Accordingly, a situation may arise that may require a commissioner to recuse him- or herself if the facts could reasonably lead one to conclude that the applicant would be biased for or against a person or entity.

Civil Service Commission Applications

The Civil Service Commission (CSC) has received two applications for two vacancies, which have been reviewed by the City Attorney's Office. In order to analyze potential conflicts, it is necessary to consider the duties of the particular commission for which the applicant is seeking appointment. The CSC is responsible for: appointment of Salary Setting Commissioners; the establishment, acceptance and continued supervision of a well-rounded civil service program; the recruiting, examining and establishing of a list of eligibles for appointment to the City service in accordance with established merit principles; and the hearing of appeals by members of the classified service and acting upon the same.

Sherilynn Chambliss: The application states educational history, civic organizations, and work experience. The entities listed do not appear to have any connection to the City of Santa Clara. Applicant is currently employed by In-Home Supportive Services (IHSS), a Santa Clara County program. At least some of the employees of IHSS are represented by the Service Employees International Union (SEIU), but it is unclear if applicant is a member. In any event, SEIU does not represent any City of Santa Clara employees or bargaining units. Therefore, the application discloses neither incompatible offices nor apparent conflicts of interest.

Anurag Dixit: The application provides information regarding employment as well as service as vice-chair of the Measure I Bond Compliance Oversight Committee. Substantively, there is very likely to be no overlap between the functions of the Bond Committee and the CSC [neither body exercises a supervisory, auditing, or removal power over the other, there is no significant clash of duties or loyalties between the two bodies, and there do not appear to be other public policy considerations that would make it improper]. The Boards and Commissions Handbook does state that an individual shall not serve on two Commissions at the same time; however, in practice, individuals have been appointed to serve on standing Boards and Commissions concurrently with limited purpose or ad-hoc committees. There does not appear to be any scheduling conflict between the two bodies. The Council may want to take this into consideration in the appointment process. The application itself does not reflect any apparent financial conflict of interest or incompatible office.

cc: Nora Pimentel, MMC, Assistant City Clerk