

2025-2026 Amador County Grand Jury

Amador Transit: Our County's People Mover Resource

June 23, 2026



**Competition Ensures
Best Value for Amador County**

AMADOR TRANSIT TABLE OF CONTENTS

SUMMARY.....	81
METHODOLOGY.....	81
Interviews Conducted.....	81
Materials Reviewed.....	81
BACKGROUND.....	83
Amador Transit Operations	83
Amador Transit Organizational Structure	83
Amador Transit Sources of Revenue.....	84
Fare Box Revenue.....	85
Non-Fare Revenues	85
Amador Transit Procurement Policies.....	85
CCR § 6683 – Contract Service Providers	85
CCR § 6684 – Competitive Bidding	86
Ch. 1 § 1.2 COMPETITION	86
Ch. 1 § 1.6 DELEGATION OF AUTHORITY	86
Ch. 2 § 2.1 SMALL ITEMS PURCHASE	87
Ch. 2 § 2.1.1 \$25,000 to \$99,999	87
Ch. 2 § 2.2.1 SOLICITATION OF BIDS.....	87
Ch. 2 § 2.3 REQUESTS FOR PROPOSALS.....	87
Ch. 2 § 2.4 NON-COMPETITIVE NEGOTIATED PROCUREMENT	87
DISCUSSION.....	88
FINDINGS	90
RECOMMENDATIONS.....	90
REQUIRED RESPONSES	91
INVITED RESPONSES.....	91
DISCLAIMER.....	91

Amador Transit: Our County's People Mover Resource

2025-2026 Amador County Grand Jury

SUMMARY

Amador Transit's mission is to provide safe, reliable transportation services to all. They accomplish their mission by providing fixed route bus service within Amador County as well as paratransit "Dial-a-Ride" service in the most populous parts of the county.

The Amador County Grand Jury's (Grand Jury) decision to conduct an investigation into compliance with Amador Transit's procurement policy was prompted by a complaint submitted to the Grand Jury by a citizen. The primary focus of this investigation is related to Amador Transit's compliance with its own adopted policies and procedures relevant to professional service agreements for bus-side advertising, or "bus wraps".

METHODOLOGY

Interviews Conducted

The Grand Jury interviewed a citizen complainant and conducted six interviews with four senior ranking administrators/managers of Amador County organizations with extensive knowledge and experience with state, county, and organizational procurement procedures and policies.

Materials Reviewed

- Transportation Development Act Statutes and California Code of Regulations, Division of Rail and Mass Transportation, July 2018
- Amador Transit Yearly Audited Financial Statements and Compliance Reports
- Amador County Regional Transportation Plan, August 2024
- State and local procurement laws, regulations, and policies
- Amador County Transportation Commission Board Meetings website
- Amador Transit Board Meeting Agendas, Packets, and Minutes
- Internet searches for available bus-wrap service providers

- The advertising Professional Services Agreement (contract) with the current bus wrap provider Hellen & Company Advertising, Inc., in effect prior to 2026
- Monthly Income Statements for payments from the advertising contract to Amador Transit
- Annual audits of Hellen & Company Advertising, Inc., for fiscal years 2023, 2024, and 2025
- Contract technical specifications for the advertisements and workmanship
- The “advertising” certificates of insurance and policy endorsements for the current work period
- Amador Transit Board Resolution listings for the years 2010 through 2025
- Federal Transit Administration, Third Party Contracting Guidance

It should be noted that current Amador Transit management was very responsive and accommodating to the Grand Jury’s documentation requests. The Grand Jury requested, but was not provided, copies of sole source justification documentation or request for proposal documentation for prior or current contracts.

BACKGROUND

At the outset of investigation, the Grand Jury endeavored to understand Amador Transit's overall mission, processes, procedures, and contracting practices. To this end, the Grand Jury reviewed the agency's mission statement and its procurement policies and procedures. The Grand Jury investigated Amador Transit's implementation of said policies and procedures. Additionally, the Grand Jury wanted to understand how the Amador Transit organization fits into overall Amador County government's organization, who they report to, their organizational structure, and how they are funded.

Amador Transit Operations

Amador County utilizes two organizations to meet its transportation needs: the Amador County Transportation Commission (ACTC) and Amador Transit bus operations. ACTC is the designated the Regional Transportation Planning Agency for the County of Amador. As the lead transportation planning agency, ACTC is responsible for acquiring Government funding that is used by Amador Transit to supplement Fare Box collections for capital asset acquisition and maintenance, in addition to transit operations. Amador Transit began operation in December 1976 with funding provided from Senate Bill 325, the Local Transportation Fund (ACTC Organization and Procedures Manual (Bylaws), October 2, 2025). Amador Transit's operations were consolidated in July 1998 via a Joint Powers Agreement (JPA) forming the Amador Regional Transit System (JPA-3rd Amendment).

Amador Transit is the officially designated Consolidated Transit Service Agency in Amador County. The agency currently provides Monday through Friday fixed route service (with up to ¾ mile deviations upon prior request) within Amador County from the Sutter Hill Transit Center to Jackson, Sutter Creek, Plymouth, Lone, and along the Highway 88 corridor through Pine Grove and Pioneer, ending at Amador Station. ADA Paratransit "Dial-a-Ride" curb-to-curb service operates in the most populated areas of the county—Jackson, Sutter Creek, Pine Grove, Pioneer, Lone, and Plymouth [Amador Transit Home web page-<https://amadortransit.com/>]. Amador Transit also provides paratransit equipped shuttle buses in the county's core areas—Jackson, Martell, and Sutter Creek.

Amador Transit Organizational Structure

Amador Transit is a separate and distinct legal entity from other member agencies. Oversight of Amador Transit is performed by a Board of Directors composed of three members appointed by the Board of Supervisors of the County of Amador and three members of the city councils of the member cities as chosen by the Amador County Mayors' Select Committee (see Figure A). Amador Transit employs its own staff to

manage in-house transit planning as well as dedicated operations personnel consisting of dispatchers, bus drivers, and mechanics.

Amador Transit Oversight and Organization

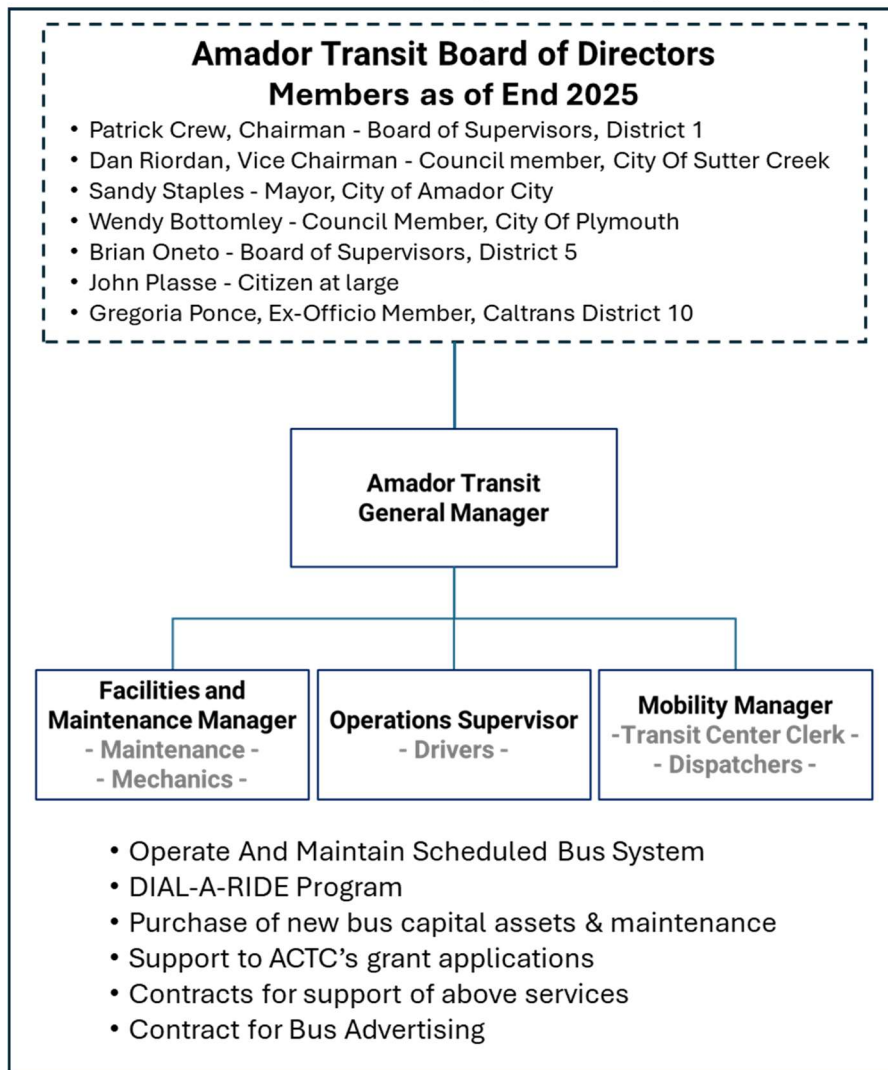


Figure A. Amador Transit Oversight and Organization

Amador Transit Sources of Revenue

California's Transportation Development Act (TDA), enacted in 1971, encompasses both Local Transportation Funds and State Transit Assistance (STA) funds (TDA 2018). As the sole STA-eligible operator in the county, Amador Transit claims Local Transportation Funds under the TDA Article 4 or Article 8 for transit operations, maintenance, and capital projects (ACTC Agenda Packet, February 5, 2026). In addition to operating the above transportation services, Amador Transit is intimately involved

with supporting ACTC's efforts to secure government funding from several state agencies.

As shown below, Amador Transit also receives revenues from several Fare and Non-Fare sources, both Operating and Nonoperating (Amador Transit System, Audited Financial Statements and Compliance Reports, June 30, 2023; Amador Transit System, Audited Financial Statements and Compliance Reports, June 30, 2024; Amador Transit Board Packet, March 5, 2026).

Fare Box Revenue

- Fixed Route Revenue
- Dial-A-Ride Revenue
- Non-emergency medical transportation

Non-Fare Revenues

- Low Carbon Transit Operations Program
- Local Transportation Fund
- State of good repair
- Fleet Reimbursement
- Expanded Mobility
- Bus Side Advertising Contracts
- STA - Capital Allocation
- STA - Capital Reserves
- STA - Operating Assistance
- Refunds & Reimbursements
- Contributions
- Interest on revenue

Amador Transit Procurement Policies

As a public entity, Amador County agencies are required by state and/or county policies for the fair and open procurement of goods and services. For example, the TDA Statutes and California Code of Regulations (CCR) Title 21, reads as follows (TDA 2018):

CCR section 6683 – Contract Service Providers

The consolidated transportation service agency may contract with any entity to provide service. The contract shall be awarded on the basis of competitive bidding.

CCR section 6684 – Competitive Bidding

The award of a service contract pursuant to Section 6683 shall be made on the basis of the procurement procedures of the county or other competitive bidding procedures approved by the transportation planning agency.

At a minimum, the opportunity to submit a bid shall be afforded to any entity that has made its availability and interest known to the consolidated transportation service agency.

Amador Transit has adopted similar policies and procedures for procuring goods and services regarding both the competitive bidding process and requirements for documenting sole source procurements. Relevant sections of Amador Transit Procurement Policy, August 9, 2023, include:

Ch. 1 section 1.2 COMPETITION

In the absence of extenuating circumstances, all procurements will be placed only after determining that the competitive forces of the marketplace are present and that the market has been afforded the opportunity to respond to Amador Transit's needs. Extenuating circumstances would include emergency actions related to issues of safety, cases where sole source procurement can be adequately justified and documented, cases where the procurement cost to seek competition is deemed greater than the potential savings, and cases where delay would cause a material loss or loss of services provided by Amador Transit.

Ch. 1 section 1.6 DELEGATION OF AUTHORITY

The following Amador Transit employees are authorized to purchase or issue purchase orders for supplies, materials, and services up to \$5,000 Transit Manager (TM) (and) \$2,500 for the Office Manager (OM) and the Maintenance Manager. The TM has delegated additional authority by the Amador Transit Board to execute all procurement documents for goods and/or services and public works contracts up to \$25,000. The provisions of the board approved annual budget limit this procurement authority to those items in the board approved annual budget. In executing their authorities as delegated above, individuals will be responsible for:

- Determining need and providing justification (all).
- Technical specifications or adequate item description (all).
- Obtaining at least 3 bids (from email, website, fax, or phone call) to ensure the price is fair and reasonable.
- Conducting price analysis (TM/OM).
- Providing sole source justifications (TM/OM).

- Purchasing or issuing a purchase order with the appropriate authorized signature, estimated costs, price quotes, and any special terms (all).

For procurements under \$25,000:

Ch. 2 section 2.1 SMALL ITEMS PURCHASE

Small items purchase usually involve relatively standard, easily specified, readily available goods or services. Small items purchase procedures are those relatively simple and informal procurement methods that are sound and appropriate for purchases/purchase orders relating to services, supplies and other property costing in the aggregate not more than \$24,999.

For procurements between \$25,000 to \$99,999:

Ch. 2 section 2.1.1 \$25,000 to \$99,999

For items or services procurements in excess of \$25,000, but less than \$100,000, price competition is obtained by solicitation of at least three quotes or (3) written description of services and costs. In the event three (3) bids are unattainable, documentation as outlined for 'Sole Source Justification' as outlined by the California Department of Transportation, Division of Mass Transportation.

For procurements of \$100,000 and over, the following sections are applicable:

Ch. 2 section 2.2.1 SOLICITATION OF BIDS

If the procurement is expected to cost more than \$100,000, it will be brought before the Amador Transit Board for approval to solicit bids.

Ch. 2 section 2.3 REQUESTS FOR PROPOSALS

In a competitively negotiated procurement, a Request for Proposals is publicized, and proposals are requested from a number of sources.

Sole source procurements are permitted given the following stipulations:

Ch. 2 section 2.4 NON-COMPETITIVE NEGOTIATED PROCUREMENT

Procurement by non-competitive proposals will be used only when the award of a contract is infeasible under small purchase procedures, sealed bids, or competitive proposals and at least one of the following circumstances applies:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay; resulting from competitive solicitation;
- The Federal Transit Administration authorizes a noncompetitive negotiation; or
- After solicitation of a number of sources, competition is determined inadequate.

A non-competitive procurement must be accompanied by a justification and be authorized by the OM. The OM has the responsibility of questioning the justification to preserve the integrity of the procurement process. In all cases, the decision to seek sole source procurement will be decided by the TM. This method of procurement involves the following steps: cost estimate, solicitation of bid, negotiating with proposer, price or cost analysis, and contract award.

DISCUSSION

The Grand Jury received a complaint from a local business owner regarding procurement activities as they relate specifically to bus wrap vendor services. The complaint was documented in email correspondence provided by the complainant. Beginning in late 2019, the complainant made multiple requests to be included as a bidder for the next bus wrap services procurement cycle but was excluded from doing so by prior Amador Transit management.

The Grand Jury's research and interviews with various agency management personnel confirmed that Amador Transit has established processes and procedures regarding the competitive procurement of products and services. As delineated above, Amador Transit Procurement Policy has special "competition" provisions when the value of a contract is expected to exceed defined thresholds—in the case of Amador Transit, that threshold is \$25,000 and above.

The Grand Jury reviewed independent auditor reports of Amador Transit financials, the bus wrap vendor financial statements, the income transfer ledgers from the bus wrap vendor to Amador Transit, and the Board of Director presentations by the Amador Transit General Manager and Amador Transit Accountant. These sources indicate that since 2023 the bus wrap contracts have generated from \$88,000 to over \$100,000 in revenue to the contractor, of which Amador Transit receives 50%. These dollar figures trigger requirements for either competitive procurements or sole source justifications that must be approved by the Amador Transit Board of Directors (Amador Transit Procurement Policy 2023 § 2.2.1 Solicitation of Bids).

To protect the procurement process, the OM is required to critically review and question the justification of a non-competitive procurement. And, in all cases, it is the TM's decision to seek a sole source procurement approval from the Amador Transit Board of Directors.

Amador Transit management was unable to provide the Grand Jury with the requested copies of sole source justification documentation or of Request for Proposal documentation for previous and the current bus wrap contracts, as required by the established Amador Transit Procurement policies for contracts exceeding \$25,000 (Amador Transit Procurement Policy 2023 §§ 2.11, 2.2, 2.3, 2.4). Furthermore, a review of the Amador Transit Board of Directors Resolution listings from 2010 through 2025, did not reveal any discussions or approval of requests to authorize Amador Transit to proceed with competitive procurements nor for sole source contracts with the bus wrap contractor as required by Amador Transit Procurement Policy, 2023.

Amador Transit's current advertising contract had expired but was still being utilized and lacked the sole source justification specified by procurement and bidding policies.

During the investigation, the Grand Jury found that Amador Transit's contracts for bus wrap services between 2011 and January 2027:

- lacked required approvals
- expired contracts were still being utilized
- contracts were renewed without following required competitive bidding procedures
- required sole source justification documentation was missing

FINDINGS

F1. Contract Value.

Amador Transit's contracts for bus wrap advertising services currently result in annual revenue of over \$100,000 to the contractor and thus require either an approved sole source justification or competitive bidding procurement.

F2. Required Documentation Not Provided.

Neither Requests for Bids nor Request for Proposal packages were developed, approved by the Amador Transit Board of Directors, or released to the public for competitive bidding for the bus wrap services contracts in effect from 2011 through January 2027, in violation of policy.

F3. Contracts Issued Sole Source.

Amador Transit management failed to provide the Grand Jury with approved sole source justification for the Amador Transit's bus wrap services contracts between 2011 and January 2027, as required for noncompetitive contracts.

F4. Other Vendors Excluded.

Amador Transit management prevented qualified vendors from competing for Amador Transit bus wrap services, risking loss of reputation and exposing the county to potential litigation.

RECOMMENDATIONS

The Amador County Grand Jury recommends that:

R1. The Amador Transit Board of Directors direct all Amador Transit personnel to strictly adhere to established purchasing policies and procedures prior to issuing any future contracts for outside services, by October 1, 2026. [F1, F2, F3, and F4]

R2. The Amador Transit Board of Directors direct Amador Transit management to provide training for all procurement personnel on the Amador Transit Procurement Policy's procurement of outside services, by December 1, 2026. [F1, F2, F3, and F4]

R3. The Amador Transit Board of Directors direct Amador Transit management to develop and implement a process to issue either sole source or Request for Proposal documentation for the procurement of bus wrap services, to include the Amador Transit Board's approval prior to public issuance, consistent with Amador Transit Procurement Policy, and report on status to the Board, by December 1, 2026. [F1, F2, F3, and F4]

REQUIRED RESPONSES

Pursuant to Penal Code sections 933 and 933.05, the following response is *required*:

- The Amador Transit Board of Directors: respond to Findings F1, F2, F3, and F4 and Recommendations R1, R2, and R3 within 90 days of receipt of this report.

INVITED RESPONSES

The Grand Jury *invites* the following individual to respond:

- The Amador Transit General Manager: respond to Findings F1, F2, F3, and F4 and Recommendations R1, R2, and R3 within 60 days of this report.

Mail or deliver a hard copy response to:

The Honorable J.S. Hermanson
Amador County Superior Court
500 Argonaut Lane
Jackson, CA 95642

Responses must be submitted to the presiding judge of the Amador County Superior Court in accordance with the provisions of Penal Code section 933.05. Responses must include the information required by Penal Code section 933.05.

DISCLAIMER

Reports issued by the grand jury do not identify the individuals interviewed. Penal Code section 929 requires that reports of the Civil Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Civil Grand Jury.