

Table 5
Although All Six Local Jurisdictions Comply With State Law, They Could Do More to Safeguard Against Conflicts of Interest

LOCAL JURISDICTION	JURISDICTION ADOPTED A CONFLICT-OF-INTEREST CODE THAT REQUIRES DESIGNATED INDIVIDUALS TO FILE CERTAIN FINANCIAL DISCLOSURES, AS REQUIRED BY STATE LAW	WEAKNESS		BEST PRACTICE	
		AT LEAST ONE INDIVIDUAL INVOLVED IN THE APPLICATION REVIEW PROCESS WAS NOT REQUIRED TO DISCLOSE CERTAIN FINANCIAL INTERESTS	INDIVIDUALS INVOLVED IN THE REVIEW PROCESS SIGN AND FILE IMPARTIALITY STATEMENTS	JURISDICTION PUBLISHED IMPARTIALITY STATEMENTS	
Fresno	✓	X	✓*	X	
Monterey County	✓	X	X	X	
Sacramento	✓	X	✓†	X	
San Diego	✓	X	X	X	
Santa Barbara County	✓	X	X	X	
South Lake Tahoe	✓	X	X	X	

Source: Local jurisdictions’ ordinances, policies, and procedures, and our selection of applications.

* Fresno has a practice of requiring individuals responsible for the initial scoring to sign impartiality statements. According to its deputy city manager, Fresno did not require individuals who interviewed applicants to sign impartiality statements.

† Sacramento only required the individuals responsible for scoring the equity-retail applications to attest to their impartiality.