

**III. ALTERNATIVES**

1. DIRECT a further review of the City of Carson and Carson Redevelopment Agency conflict of interest codes; and/or
2. SEND the attached resolution back for further review by the City Attorney and staff.
3. TAKE any other action the City Council deems appropriate.

**IV. BACKGROUND**

Under the Political Reform Act (the Act), all public agencies are required to adopt a conflict of interest code (code) and to periodically review and update the same. The codes designate positions required to file Statements of Economic Interests (Form 700), and assigns disclosure categories specifying the types of interests to be reported. The Form 700 is a public document intended to alert public officials and members of the public to the types of financial interests that may create conflicts of interests.

The Redevelopment Agency's code, and the city's code, must both specifically list positions that make or participate in making decisions. Typically, positions that involve voting on matters, negotiating contracts, or making recommendations on purchases without substantive review must be included in codes. Positions listed in Government Code § 87200 (i.e. City Councilmembers, Planning Commissioners, Members of the Board of Supervisors, etc.) are not required to be included, because these positions automatically file Form 700.

A primary purpose of the code is to require disclosure of those types of investments, interests in real property, sources of income and business positions that designated positions may affect in their decision-making. For example, the manager of an agency should be assigned full disclosure (all investments, interests in real property, and sources of income and business positions) because the manager makes decisions that affect a wide range of interests. Alternatively, a purchasing agent whose decision-making is limited to the purchase of office supplies should only be assigned disclosure of investments, sources of income and business positions in entities that provide office supplies, equipment or merchandise of the type used by the agency.

The city of Carson has special disclosure categories relating to properties and interests surrounding mobilehomes as such properties and interests are a significant part of the way the city and agency have to conduct business in the community of Carson. Cities are allowed to create particular categories that are unique to their special needs in order to allow for full disclosure and transparency within the city and its agencies.

An agency's Code is not effective until it has been approved by the agency's code