

**LOCAL GOVERNMENT ETHICS
CODES AND BOARDS**

SEPTEMBER 2000 -- PERFORMANCE AUDIT



**EDWARD B. HATCHETT, JR.
AUDITOR OF PUBLIC ACCOUNTS**

The Auditor Of Public Accounts Ensures That Public Resources Are Protected, Accurately Valued, Properly Accounted For, And Effectively Employed To Raise The Quality Of Life Of Kentuckians.



Edward B. Hatchett, Jr.
Auditor of Public Accounts

September 1, 2000

To the People of Kentucky
The Honorable Paul E. Patton, Governor

Re: Performance Audit of Local Government Ethics Codes and Ethics Boards

Ladies and Gentlemen:

We present our report on Local Government Ethics Codes and Boards. We are distributing this report in accordance with the mandates of KRS 43.090. In addition, we are distributing copies to members of the committees of the General Assembly with oversight authority for local ethics, as well as other interested parties.

KRS 43.090 (1) requires auditees to notify the Legislative Research Commission and the Auditor of Public Accounts of the implementation status of audit recommendations. This notification should be within 60 days of the completion of the final audit report. After an appropriate period, we will contact the respective agency and other parties to determine whether the report's recommendations are implemented and will advise the Legislative Research Commission regarding the status of that implementation. Once we are advised that the recommendations have been implemented, they will be considered closed.

Our Division of Performance Audit evaluates the effectiveness and efficiency of government programs as well as completes risk assessments and benchmarking of those operations. We will be happy to discuss with you at any time this audit or the services offered by our office. If you have any questions, please call Gerald W. Hoppmann, Director of our Division of Performance Audit, or me.

We appreciate the courtesies and cooperation extended to our staff during the audit.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ed Hatchett".

Edward B. Hatchett, Jr.
Auditor of Public Accounts

Executive Summary

Kentucky has multiple ethics laws

Kentucky's General Assembly has created distinct ethics frameworks applicable to four categories of government officials: state executive, state legislative, and state judicial branches, and local government. While each framework was intended to encourage ethical behavior, the inconsistency and confusion resulting from applying different rules to different public officials lessens the impact of a consistent and integrated ethics framework.

Local ethics is governed by KRS 65.003

The ethics law for local government is codified at KRS 65.003, enacted in 1994. The statute mandates codes of ethics for city and county officials and employees.

Some local governments are not in compliance with KRS 65.003

An examination of the effect of KRS 65.003, however, reveals that some local governments are not in compliance. In addition, jurisdictions do not always explicitly reflect statutory provisions in their codes. Three cities have not enacted ethics ordinances at all, and as a result, state funds that otherwise would have been allocated for these entities have been suspended. Examination of local ethics ordinances also reveals that some do not contain all required provisions.

KRS 65.003 is vague and does not adequately discuss training and oversight

Part of the reason for the problems local governments have encountered in interpreting KRS 65.003 can be attributed to the vague language of the statute. The statute lacks a definition section and the meaning of many terms and phrases, and thus the intention of the General Assembly, is not clear. In addition, the statute does not adequately address training and oversight.

Because of the vague language of the statute, Department for Local Government (DLG) initially had concerns about the applicability of the statute to appointed officials, as well as concerns about lack of specificity in the statute. As a result of this concern, the Attorney General was asked to opine.

Kentucky's ethics system is decentralized

Furthermore, the local government ethics system is difficult to monitor or oversee. Kentucky has 120 counties and more than 400 cities, which means that DLG must collect copies of ethics ordinances from hundreds of jurisdictions and try to determine whether the ordinances are in compliance with the requirements of the statute. Such a decentralized system makes it difficult to attain consistency.

The majority of local jurisdictions have not entered into regional or countywide ethics agreements, perhaps underscoring the inclination of communities to retain control over the administration of local ethics. Nevertheless, KRS 65.210-300 authorize such regional compacts. Ten countywide ethics boards and one regional ethics board, approved by the Attorney General, exist. In addition, two regional ethics boards are operating through Memoranda of Agreement that have not been approved by the Attorney General, as required by the Interlocal Cooperation Act.

Kentucky's local government ethics boards are more decentralized than those in other states

Some states have centralized jurisdiction and administrative oversight of local government ethics. However, Kentucky's system, based as it is on the concept of home rule, reserves broad discretion to local governments. The disadvantages of Kentucky's approach include inconsistency of process and definition among over 550 jurisdictions, inequity of penalties attaching to comparable acts, and resulting confusion and diminution of trust and confidence on the part of citizens. A local government ethics system that fosters more centralized authority and greater consistency will better protect the reputation of local public officials in every jurisdiction.

Table of Contents

TRANSMITTAL LETTER	
EXECUTIVE SUMMARY	i
INTRODUCTION	5

Kentucky's Multiple Government Ethics Systems	5
Evolution of Public Policy on Local Government Ethics	6
Kentucky Enacts Local Government Ethics Legislation	7
Amendments to Statute	8
Audit Objectives	8

Chapter 1

What are the Effects of KRS 65.003?

Summary	9
Ethics Laws Should Engender Confidence and Trust in Public Officials	10
Not all Local Entities Have Complied with Statutory Requirements	10
Requirements of KRS 65.003 and Other Criteria	12
Standards of Conduct Section	12
Intent of language requires interpretations by Attorney General	13
Financial Disclosure Section	13
Nepotism Section	13
Allegations of nepotism in local government	14
Enforcement Section	15
KRS 65.003 does not grant subpoena power	15
Vagueness Creates Need for Additional Attorney General Opinions	15
Other Attorney General opinions	16
No Definitions Section in KRS 65.003	16
Lack of Oversight and Training	16
DLG Oversight	16
DLG has authority to cause suspension of funds	17
Three Cities Have Not Developed Codes	17
Training Inconsistencies	18
Problems Relating to Ethics Violations	18
Financial audit comments relate to possible ethics violations	18
Related Newspaper Articles	19
Recommendations	20

Table of Contents

Chapter 2

What Types of Local Government Boards Exists and Are They Active?

Summary	22
Statutory Criteria for Countywide and Regional Boards	23
House Bill 275 amends KRS 65.260	23
Types of Local Government Ethics Boards	23
Countywide Ethics Boards.....	24
Some countywide ethics boards did not have agreements on file with the Secretary of State's office or the County Clerk's office	24
Regional Ethics Boards.....	24
Two regional ethics boards are technically out of compliance with the Interlocal Cooperation Act.....	24
Few Cities or Counties Have Chosen to Join Countywide or Interlocal Ethics Boards	26
Countywide and Regional Ethics Boards May Reduce Local Conflicts of Interest and Facilitate Oversight.....	26
Countywide or Regional Ethics Boards Should Develop a Unified and Specific Code	27
Surveys Sent to Local Governments	27
Surveys Conclude Inactive Ethics Enforcement Bodies.....	28
Surveys Conclude that Most Boards Provide Copies of Codes to Officials and Employees.....	28
Training Varies from Board to Board.....	29
Surveys Show that Boards Activity Varies Widely	30
Recommendations	31

Chapter 3

How Does Kentucky Compare with Other States?

Summary	32
Best Practices In Local Government Ethics	32
Description of Local Government Ethics in Other States	33
Georgia	33
Illinois	35
Massachusetts.....	35
Missouri	36
New Jersey.....	37
North Carolina.....	37
Ohio	37
Oregon	38
Virginia	38
West Virginia	39
Recommendations	39

Table of Contents

Appendices

I.	Scope and Methodology.....	40
II.	APA Checklist.....	42
III.	APA Checklist Test.....	46
IV.	Countywide and Regional Agreements	86
V.	Auditor of Public Accounts Information.....	89

Tables

Table 1	Checklist for Local Government Ethics Codes Based Upon Application of KRS 65.003.....	11
Table 2	Survey Response from Local Government Entities Regarding Distribution of Ordinance (Code) to Officials and Employees	28
Table 3	Summary of Training Provided by Local Governments to Their Ethics Board Members.....	29

Figures

Figure 1	Ethics Boards and Agreements.....	26
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Abbreviations

APA	Auditor of Public Accounts
DLG	Department for Local Government
OAG	Office of Attorney General
KACo	Kentucky Association of Counties
KLC	Kentucky League of Cities
NLC	National League of Cities
NACo	National Association of Counties
HB	House Bill
KRS	Kentucky Revised Statutes

Introduction

Kentucky's Multiple Government Ethics Systems

Kentucky public policy on government ethics has unfortunately seen a proliferation of piecemeal enactments resulting in a confusing patchwork of inconsistent ethical frameworks. Ethical standards for public officials are governed by four distinct ethics systems. One system of laws and opinions govern state executive branch officials. Another system applies to legislative branch officials. Still two other distinct frameworks govern judicial branch and local government officials. Following is a brief description of each system.

Executive Branch: The Executive Branch Code of Ethics, which was enacted in 1992, is contained in KRS Chapter 11A. It provides for standards of conduct for executive branch officials and the composition of the Executive Branch Ethics Commission. Executive branch agencies include those that are headed, directly or indirectly, by the Governor or other statewide elected officials to carry out the laws of the Commonwealth.

The Commission is charged with promulgating administrative regulations, issuing advisory opinions interpreting applications of the statutes, investigating potential violations, and hearing complaints. To carry out a preliminary investigation, the Commission may issue subpoenas to compel attendance and testimony of witnesses and production of documents, books, papers, or other records.

Legislative Branch: The enabling statute for the Legislative Ethics Code, which was enacted in 1993, is contained in KRS 6.601 through 6.849. It covers registration of legislative agents and employers, statements by legislative agents and employers concerning lobbying expenditures and expenses and financial transactions, conduct of members of the General Assembly, and financial disclosure statements of members of the General Assembly and legislative candidates and key legislative staff.

The Legislative Ethics Commission has jurisdiction to investigate any complaint concerning a potential violation of the Code of Ethics and may conduct adjudicatory proceedings. It may enforce penalties, including public reprimand, recommending a sanction to the house in which the violator serves, including censure or expulsion, revocation of the registration of any legislative agent or employer for up to five years, or fines up to \$2,000. It has the power to issue subpoenas to compel attendance of witnesses and the production of papers, books, accounts, documents, and testimony.

Judicial Branch: The Kentucky Code of Judicial Conduct is authorized under Supreme Court Rules 4.000 through 4.310. It provides canons of judicial behavior, including independence, impartiality, diligence, and avoidance of the appearance of impropriety.

The Kentucky Judicial Ethics Committee is authorized under Supreme Court Rule 4.310. It provides opinions regarding the propriety of any act or conduct and the construction or application of any canon upon request of any justice, judge, or trial commissioner. While the Judicial Ethics Committee has authority to issue advisory opinions, the Judicial Conduct Commission has authority to impose sanctions for misconduct in office, persistent failure to perform judicial duties, incompetence, habitual intemperance, and other violations.

It has the authority to conduct preliminary investigations, formal proceedings, and hearings. It may compel the attendance of witnesses and the production of records and other evidence.

Local Government: The enabling statute for local government codes was enacted in 1994 and is contained in KRS 65.003. It requires that all cities and counties adopt a code of ethics. Codes are required to include a standards of conduct section for local officials; requirements for financial disclosure, a policy on the employment of family members, and the designation of a person or group who shall be responsible for enforcement of the code of ethics. The statute allows cities and counties to enter into agreements with other cities or counties, as provided by the Interlocal Cooperation Act, KRS 65.210 to 65.300, to adopt joint codes of ethics.

Local enforcement entities are responsible for the enforcement of the code receipt of complaints alleging possible violations of the code, issuance of opinions, and investigation of possible violations of the code. However, the statute does not give enforcement entities subpoena powers.

These multiple systems result in an uneven, inequitable ethics landscape for government officials, lead to confusion and frustration, and lessen the impact of a consistent and integrated ethics framework for the Commonwealth. This report is confined, however, to the ethics system for local government. We explore issues related to code development, enforcement, consistency, and oversight.

Evolution of Public Policy on Local Government Ethics

After several highly publicized ethical scandals involving public officials, the General Assembly enacted the Executive Branch Code of Ethics for state government. It became effective in July 1992. The Legislative Code of Ethics was enacted in September 1993. Although no state law regarding local government ethics existed then, discussion of the matter had begun in early 1993 during the First Extraordinary Session of the Kentucky General Assembly.

A joint meeting of the Interim Senate Local Government Committee, the Interim House Committee on Cities, and the Interim House Committee on Counties & Special Districts was held in April of 1993 to discuss local ethics. At its conclusion, local government organizations, primarily the Kentucky League of Cities (KLC) and the Kentucky Association of Counties (KACo), were asked to develop proposals for a local government ethics code. KLC and KACo presented separate but similar proposals at the June 1993 meeting of the interim committees. The joint committees then requested that the two organizations work together to consolidate their proposals and return with a single local government ethics proposal.

In October 1993, KLC and KACo presented a joint local government ethics proposal to the committees, outlining guiding principles for legislative consideration. It stated that in order to gain the support of local governments, any legislation introduced during the 1994 session of the Kentucky General Assembly had to embody the following principles:

- Local government officials support the establishment of simple, sensible ethics standards to guide them in the performance

of their public functions and to foster public trust in the integrity of local government officials and processes.

- A local government ethics code enacted at the state level must be flexible enough to account for the tremendous diversity that exists among Kentucky's cities, counties, and numerous other local government entities.
- A local government ethics code that has the effect of discouraging public service at the local level, must be avoided. The local government ethics code must not be unduly complex or burdensome in view of the nature of local public service and must not impose unnecessary prohibitions.
- The framework of the local government ethics code must be consistent with the principle of local "home rule." Webster defines this principle as "...self-government or limited autonomy in internal affairs by a dependent political unit."

The proposal's framework was based on New Jersey statutes enacted in 1991. The joint proposal had the following features:

- Enactment of a statutory local government ethics law detailing a code of conduct, financial disclosure requirements, and provisions governing the issue of nepotism.
- Establishment of a statewide ethics board to implement and enforce the local government code of ethics.
- Authorization for any local government to create a local ethics code and/or local ethics board (code should be at least as stringent as proposed code).
- Authorizations for local boards to investigate, hear complaints, impose penalties, and issue opinions regarding local officers and employees.

The joint ethics code proposal submitted by KLC and KACo was never introduced during the 1994 regular session. *The KLC Local Government Ethics Handbook* explained that many legislators were concerned that the proposal was too stringent, and that, if enacted into law, would have a negative effect on the operations of local government. Legislators were particularly concerned about the effect on the operations of many local boards, commissions, and authorities that depend on volunteer service by local government citizens.

Kentucky Enacts Local Government Ethics Legislation

HB 238, an alternative local government ethics proposal, gave each local entity responsibility for the content of its code. During the second week of the 1994 session, HB 238 was introduced. It was later approved by the House by a vote of 84-10 and passed by the Senate by a vote of 32-4.

On July 15, 1994, HB 238 was codified as KRS 65.003. The statute was not as specific as the KLC-KACo proposal, but it did provide for the establishment of a code of ethics and an entity to enforce the code. It also required that codes be

Introduction

adopted no later than January 1, 1995. Each code was to address four broad areas: standards of conduct, financial disclosure, nepotism, and an enforcement body. No minimum requirements were established for these areas.

The statute requires that all cities and counties adopt a code of ethics. It allows cities and counties to enter into agreements with other cities or counties, as provided by the Interlocal Cooperation Act, KRS 65.210 to 65.300, to adopt joint codes of ethics. The code applies to all elected officials, to appointed officials, and to other employees as specified in the code. Elected officials are identified as the mayor, judge/executive, members of the governing body, county clerk, county attorney, sheriff, jailer, coroner, surveyor, and constable. Members of school boards are excluded. Additional requirements instruct each local government to provide a copy of the ordinance by which the code was adopted or amended and proof of publication to the DLG within twenty-one days of adoption.

The statute also provides that if any city or county fails to comply with these requirements, all services and payments of money from the state **shall** be suspended. DLG **shall** notify all state agencies and area development districts that provide services or payments to the city or county that it is not in compliance with statute. These entities **shall** suspend all payments and services to the city or county until they have been notified by DLG that the city or county has complied with the statute.

KRS 65.003 allows local governments in the Commonwealth to develop their own ethics codes and boards. This preservation of local autonomy sacrifices consistency of applications and interpretations among the jurisdictions. For example, an act that is deemed ethical in one jurisdiction may be considered unethical, and therefore prohibited, in another. Greater statewide consistency in the application of local ethics rules could, on the other hand, increase public confidence and trust. Thus, the benefits of increased consistency which helps to ensure that such a disparity does not exist, may be more important to the public than a local ethics system based on the concept of home rule.

Amendments to Statute

Effective July 15, 1996, KRS 65.003 was amended to require that candidates for local offices comply with the financial disclosure provisions contained in the code of ethics. In addition, HB 275, an act relating to interlocal agreements, was passed by the 2000 General Assembly and was signed by the Governor. Effective July 15, 2000, it amends KRS 65.260 to require interlocal agreements to be submitted to DLG for determination of proper form and compatibility with state law. Under previous law, that responsibility has been the Attorney General's.

Audit Objectives

This audit was conducted in accordance with Generally Accepted Governmental Auditing Standards. The audit's purpose was to evaluate local government ethics codes for compliance and to determine whether provisions contained in these codes were being enforced by local ethics boards.

The audit was designed to address the following questions:

- I. What are the effects of KRS 65.003?**
- II. What types of local government ethics boards exist and are they active?**
- III. How does Kentucky compare with other states?**

Chapter 1

What Are the Effects of KRS 65.003?

Summary

The language of KRS 65.003 is vague on certain ethics issues and does not adequately address training and oversight for local officials. As a result, problems in the following areas have arisen:

- Non-compliance by some cities and counties with KRS 65.003
- Need for interpretations of KRS 65.003
- Inadequate training and oversight

The combination of these problems has impeded the effectiveness of local ethics reform in the Commonwealth.

KRS 65.003 states that local codes must address the following general areas:

- Standards of Conduct
- Financial Disclosure
- Nepotism
- Enforcement

The statute does not, however give explicit direction on how a city or county should address these areas. For example, it gives the city or county discretion to decide what level of nepotism is or is not acceptable. As a result, the majority of local ethics codes are broad and do not contain specifics related to the four general provisions in the statute.

The cities of Mockingbird Valley, Poplar Hills, and Southpark View have not created individual ethics codes as required by KRS 65.003. DLG has caused the suspension of state funds to these entities.

Chapter 1

What Are the Effects of KRS 65.003?

Ethics Laws Should Engender Confidence and Trust in Public Officials

The intent of KRS 65.003 was to establish ethical standards that encourage public trust and confidence in local officials. The *Kentucky League of Cities Local Government Ethics Handbook* states that whatever processes are chosen, officials should bear in mind that they are "public" servants.

In order to increase public confidence and trust in ethics laws there must be specific detail regarding the mechanics such as training, oversight, and enforcement. The vagueness of Kentucky's ethics statute may devalue the public's perception of local government ethics in the Commonwealth.

We examined the KLC handbook and consulted the following resources:

- Kentucky League of Cities/Kentucky Association of Counties' (KLC/KACo) "Joint Proposal for a Local Government Code of Ethics," which was proposed in 1993;
- DLG's "Administrative Protocol for Local Government Ethics Ordinances" and "Local Government Ethics Issues for Legislative Consideration;"
- Ethics statutes from the states of Georgia, Illinois, Massachusetts, Missouri, New Jersey, North Carolina, Ohio, Oregon, Virginia, and West Virginia; and
- Various legal and general literature on ethics.

Not All Local Entities Have Complied With Statutory Requirements

We tested 120 county ordinances and 428 city ordinances¹ on file at DLG to determine whether they comport with KRS 65.003. We designed and applied questions for each subsection of the statute, applying those questions to each code. Our testing did not probe the differences in size and population existing in the various jurisdictions. However, we acknowledge that some counties and cities may be better positioned than others to develop complete codes and create active ethics boards. Scope and Methodology are described in Appendix I.

Table 1 summarizes code weaknesses detected by auditors. It lists the requirements of the sections of the statute, as well as the number of cities and counties that do not specifically address these requirements. It should be noted that discrepancies do not necessarily mean that the corresponding cities and counties are out of compliance with KRS 65.003. For example, just because a code does not specifically state that financial disclosure statements are available for public inspection, does not mean the city or county government is restricting access to those statements. Specific criteria used in testing are included in Appendix II. The complete testing and results are included in Appendix III.

¹Four cities did not have a code of ethics ordinance on file at DLG. Therefore, survey population is based on 548 instead of 552. The city of Crescent Park was included in testing; however, subsequent information from the Secretary of State's Office confirmed that the City was dissolved in June 1999. Further, the city of Buckhorn was not part of the testing; however, subsequent information from the Secretary of State's Office confirmed that it has been a city since January 1996. DLG did not have an ordinance adopting the local government ethics code on file as of January 2000, but we obtained a copy of the ordinance from the city of Buckhorn after our testing. Therefore, this did not change the overall number of cities in the population.

Chapter 1
What Are the Effects of KRS 65.003?

Table 1: Checklist for Local Government Ethics Codes Based Upon Application of KRS 65.003

Statutory Provisions	Number of County Codes that DO NOT Specifically Address Statutory Provisions	Number of City Codes that DO NOT Specifically Address Statutory Provisions
• Code contains a Standards of Conduct Section [KRS 65.003(3)(a)]	0	0
• Standards of Conduct Section applies to elected officials [KRS 65.003(3)(a)]	2	12
• Standards of Conduct Section <i>explicitly</i> applies to elected officials, appointed officials, AND employees ² [KRS 65.003(3)(a)]	96	119
• Code contains a Financial Disclosure Section [KRS 65.003(3)(b)]	0	0
• Financial disclosure statements are filed annually [KRS 65.003(3)(b)]	7	15
• Candidates are required to file financial disclosure statements [KRS 65.003(1)]	12	88
• Elected officials are required to file financial disclosure statements [KRS 65.003(3)(b)]	1	4
• Financial Disclosure Section <i>explicitly</i> states that statements are available for public inspection [KRS 65.003(3)(d)]	57	75
• Financial disclosure statements are filed with person or group responsible for enforcement of the code [KRS 65.003(3)(b)]	42	65
• Code contains a Nepotism section [KRS 65.003(3)(c)]	0	0
• Code contains an Enforcement Section [KRS 65.003(3)(d)]	0	0
• Enforcement body maintains financial disclosure statements [KRS 65.003(3)(d)]	14	20
• Enforcement body has authority to receive complaints [KRS 65.003(3)(d)]	8	10
• Enforcement body has authority to issue opinions [KRS 65.003(3)(d)]	13	22
• Enforcement body has authority to investigate possible violations [KRS 65.003(3)(d)]	33	42
• Enforcement body has authority to impose penalties [KRS 65.003(3)(d)]	8	15
• Code contains an enactment clause [KRS 67.076 (4) for counties and KRS 83A.060 (2) for cities]	11	5
• Code contains a title [KRS 67.076 (3) for counties and KRS 83A.060 (1) for cities]	1	4
• Proof of Publication is on file at DLG [KRS 65.003(5)(a)]	1	0
• Proof of Publication of amendments on file at DLG, if applicable [KRS 65.003(5)(b)]	2	17

Source: Files maintained by DLG.

Note: Although some counties and cities are out of compliance with KRS 65.003, discrepancies noted in our testing do not necessarily mean that corresponding counties and cities are out of compliance. Shaded areas represent statutory provisions that could be more specific and clear.

² Codes using "all nonelected officers" were counted as including appointed officers per KRS 83A.080.

Chapter 1

What Are the Effects of KRS 65.003?

Requirements of KRS 65.003 and Other Criteria

While KRS 65.003 does not mandate specific language or standards for local codes of ethics, it does require each local entity to address the following general areas:

1. A code must be adopted by January 1, 1995.
2. A code must address:
 - Standards of Conduct
 - Financial Disclosure
 - Nepotism
 - Enforcement Body
3. An enforcement body must be created for:
 - Maintaining financial disclosure statements, which shall be available for public inspection
 - Receiving complaints
 - Issuing opinions
 - Investigating violations
 - Imposing penalties.
4. A code must be applicable to all elected officials.
5. A copy of the ordinance that adopts the code, along with proof of publication, must be mailed to DLG within 21 days of adoption.
6. All code amendments, along with proof of publication, must be mailed to DLG within 21 days of adoption.
7. Candidates must be required to comply with financial disclosure mandates as outlined in the code of ethics (1996 amendment).

In the following section, we discuss provisions of the statute that are problematic because of their ambiguity and broadness.

Standards of Conduct Section

KRS 65.003(3)(a) states that each code of ethics shall include a Standards of Conduct Section. All counties and cities have codes that include this section. However, 96 counties (80%) and 119 cities (28%) have codes that do not *explicitly* apply to elected officials, appointed officials, and employees. Although KRS 65.003 is currently interpreted by the Attorney General and DLG as not requiring local governments to include appointed officials, we believe ethics codes should apply to all officials and employees.

Ninety-four of the county codes (78%) and 114 of the city codes (27%) do not include appointed officials. As a result, many of the appointed local officials in Kentucky may not be held to the same ethical standards as are elected local officials.

Chapter 1

What Are the Effects of KRS 65.003?

We discussed this issue with DLG officials who stated that cities and counties are often concerned that strict ethics requirements may prevent qualified individuals from accepting appointments to professional boards. Nevertheless, we believe that ethics codes should consistently and explicitly apply to elected and appointed officials and employees.

Intent of language requires interpretation by Attorney General

The Attorney General interpreted KRS 65.003(3)(a) after a request from DLG KY OAG 95-16 was issued on April 10, 1995 and states that KRS 65.003 does not require a local government to extend coverage of the local code of ethics to all appointed officials and employees. The pertinent language of the opinion is as follows:

“We are persuaded that the statute must be construed to allow the more specific provisions to prevail; that is, because the legislature stated three times that the code applies to all elected officials and to other employees as specified, those provisions supply the more carefully expressed legislative intent.” The opinion also states that “the brief reference in paragraph 3(a) to ‘elected and appointed officials and employees’ does not necessarily denote all elected and appointed officials and employees. Rather, it denotes those officials that other provisions of the statute make subject to the code.”

However, in order to increase the public’s trust and confidence in elected and appointed officials and employees, ethics laws should provide uniform requirements for all. Kentucky’s ethics statute should be amended to explicitly apply to appointed officials.

Financial Disclosure Section

KRS 65.003(3)(b) requires that each code of ethics require officials and candidates file annual financial disclosure statements. Although all cities and counties include a Financial Disclosure Section in their codes, we identified 119 instances among counties and 247 instances among cities where ethics codes do not contain all required financial disclosure statement provisions, or do not specifically address the requirements. See Table 1 and Appendix III for more information on these statutory provisions. The financial disclosure section contains the following requirements:

- Annual filing
- Applies to candidates
- Applies to Elected officials
- Statements are available for public inspection
- Statements are filed with person or group responsible for code enforcement

We believe that the Financial Disclosure Section should clarify and emphasize (1) filing deadlines, (2) who is required to file, (3) what must be disclosed, and (4) how and by whom the statements are handled.

Nepotism Section

KRS 65.003(3)(c) states that each code of ethics should include a “policy on the employment of members of the families of officials or employees of the city or county government...”

Chapter 1

What Are the Effects of KRS 65.003?

Although all of the codes contain a nepotism section, the lack of specificity in the statute and the absence of definitions of “nepotism” and “family” result in subjectivism and inconsistency.

The *Kentucky League of Cities Local Government Handbook* explains that the passage of House Bill 238 requires local entities to establish a policy on nepotism. The *Handbook* editors believed that the legislative intent was for local governments to establish a reasonable restriction on nepotism. In its handbook, KLC advised each city to address the subject in a serious manner by establishing a nepotism provision that would effectively curb or eliminate the most abusive aspects of nepotism. KLC further urged that if cities did not choose to place reasonable restrictions on nepotism, the media and public outcry would surely be great. If that occurred, KLC said, "there would be nothing to prevent the General Assembly from revisiting the issue and enacting a more stringent anti-nepotism provision."

However, like the county and city codes we reviewed, the KLC/KACo code do not specify whether nepotism should or should not be disallowed. Many of the codes we reviewed contained variations of the following provisions contained in the KLC/KACo code:

1. Prohibit any local government officer or employee from acting in his official capacity to hire or cause to be hired any immediate family member at a rate of compensation, or with employment benefits in excess of any other employee with similar job duties, responsibilities, qualifications, and training.
2. Prohibit any local government officer or employee from exercising contract management authority with respect to any contract held by a member of the officer's or employee's immediate family, or held by a business organization which employs a member of the officer's or employee's immediate family.

We discussed nepotism with DLG officials who stated that rigid restrictions could hurt the ability of smaller cities and counties to hire qualified people. Although strict anti-nepotism “makes sense in a perfect world” the reality of putting such a policy into practice could be difficult, according to a DLG official.

We acknowledge that uniform nepotism restrictions may fall most heavily upon small, sparsely-populated jurisdictions, but believe some effort should be made to strengthen nepotism sections by requiring more specificity of application and definition. For example, codes should clearly delineate prohibited actions such as influencing the hiring of family members, and define the terms “family members.”

Allegations of nepotism in local government

The broadness of KRS. 65.003 perpetuates public debate about nepotism in local government. Without more specific ethics legislation and stronger enforcement bodies, the following nepotism issues are likely to arise again:

- Six months after passing an ethics code prohibiting the hiring of anyone related to an elected official, the city council of one Kentucky city voted to hire the stepson of a city council member.

Chapter 1

What Are the Effects of KRS 65.003?

- One former county judge/executive had seven relatives on the county payroll. The Fiscal Court of another county had more relatives on the payroll than any county in the state, although its ethics code prohibited nepotism for future office holders.
- A 1998 Kentucky Supreme Court decision ruled that judges could hire their spouses.
- One Fiscal Court amended the county's ethics code to increase the number of permissibly employed relatives from one to two. The county's Judge/Executive was quoted as saying "If you need somebody you can trust real well, there's nothing better than a relative..."

Enforcement Section

KRS 65.003(3)(d) requires that each code shall designate a person or group responsible for enforcement of the code of ethics. Although all cities and counties include an Enforcement Section in their codes, we identified 76 instances in counties and 109 instances in cities where ethics codes do not contain all required enforcement section provisions. See Table 1 and Appendix III for more information about these statutory provisions. The enforcement section of each code is evaluated on the basis of the existence of the following provisions:

- Code contains an enforcement section
- Enforcement body maintains financial disclosure statements
- Enforcement body has authority to receive complaints
- Enforcement body has authority to issue opinions
- Enforcement body has authority to investigate possible violations
- Enforcement body has authority to impose penalties

KRS 65.003 does not grant subpoena powers

KRS 65.003 does not grant local enforcement bodies subpoena powers, although the statute provides for other powers. As a result, these enforcement bodies are hampered in their capacity to fully investigate possible ethics violations.

Earlier concerns expressed by DLG were sent to the Legislative Research Commission (LRC), which addressed implementation issues surrounding KRS 65.003. DLG wrote that local officials argued the responsibilities delegated to an enforcement entity cannot be carried out effectively unless sufficient authority exists to require the testimony of individuals or the production of records.

Interestingly, if legislation proposed during the 2000 Regular Session had passed, it would have amended KRS 65.003 to permit a city and a county or their agents to enter into memoranda of agreements or interlocal agreements for the creation of a joint code of ethics. One provision which was deleted from the original language of the bill granted local ethics boards subpoena power. The ability to issue subpoenas would have improved the effectiveness and strength of enforcement bodies. The legislative proposal failed.

Vagueness Creates Need for Additional Attorney General opinions

The vagueness of KRS 65.003 resulted in the request for additional Attorney General opinions. In addition to KY OAG 95-16, the Attorney General has issued the following opinions concerning KRS 65.003:

Chapter 1

What Are the Effects of KRS 65.003?

Other Attorney General opinions

- KY OAG 96-17: Joint city-county bodies (i.e. Joint Planning and Zoning Commissions) are not units of city and county governments for purposes of KRS 65.003 and the members of these boards are not subject to their local government ethics codes.
- KY OAG 94-69: DLG has the duty to receive and hold public records and copies of local ethics ordinances and evaluate compliance of these local ordinances with KRS 65.003.
- Correspondence from the Attorney General notes that a local official's membership on the local ethics enforcement body would present a conflict of interest. There is no explicit language in KRS 65.003 addressing this issue.
- Correspondence from the Attorney General notes that local governments do not have the authority to require candidates to comply with the financial disclosure requirements contained in the code of ethics. The General Assembly amended KRS 65.003 in the 1996 Regular Session to require candidates to comply with the financial disclosure provisions contained in the code of ethics.

No Definitions Section in KRS 65.003

KRS 65.003 does not include a definition section applicable to the statute's four major areas. As a result, local ethics boards may have difficulty using the statute as a basis for making decisions. Unfair and inconsistent decisions may result. Ethics laws should clearly define all terms needed for fair and consistent consideration of ethics cases.

Lack of Oversight and Training

KRS. 65.003 does not provide for oversight and training of local officials. As a result, orientation and training has been problematical. Although DLG, KACo, and KLC conducted early joint workshops, differing interpretations of the statute, antipathy of local officials toward the statute, and challenges to DLG's oversight role compromised the effectiveness of training. Local codes developed in the absence of a consistent and acknowledged framework.

DLG Oversight

During the early review of local ethics codes, the Kentucky Magistrates and Commissioners Association asked the Attorney General to opine upon DLG's duties pertaining to local ethics codes. OAG 94-69 resulted, stating that DLG must determine whether the basic requirements of KRS 65.003 "...have apparently been met, and that there is not an obvious infirmity in an ordinance..." that would make it invalid.

DLG reports that it reviews codes only for the presence of language addressing the four general areas contained in the statute. The *Administrative Protocol for Local Government Ethics* states that DLG's role is not to assess the effectiveness or appropriateness of the contents of the ordinances.

Therefore, regardless of content, codes that contain language addressing the four general areas have been approved by DLG. An example is one city's nepotism section which states:

Chapter 1

What Are the Effects of KRS 65.003?

“Since the city has no employees, and none are anticipated for any time in the foreseeable future, requirements relating to the subject of nepotism have been excluded from this ordinance. If at some time in the future this situation should change, then this ordinance will be re-worked in order to include nepotism and to then deal with the relationships and actions of those employees as a group.”

DLG authority to cause suspension of funds

Although DLG’s role has been described as verifying general compliance with the statute, it has authority to cause the suspension of funds to local governments that fail to comply. KRS 65.003(6) states that DLG “**shall** notify all state agencies, including area development districts, which deliver services or payments of money from the Commonwealth to the city or county government.” It goes on to say that “those agencies**shall** suspend delivery of all services or payments to the city or county government which fails to comply with the requirements of this section.”

Although DLG has used its authority to cause suspension of funds to counties or cities that do not submit codes, we believe it should have expanded authority to cause suspension of funds to cities or counties that do not appoint an ethic enforcement entity. DLG has been made aware of instances in which jurisdictions failed to appoint ethics boards, yet because DLG has no explicit authority to act on this information, local citizens are left to the courts for enforcement.

Three Cities Have Not Developed Codes

Currently, the cities of Mockingbird Valley, Poplar Hills and Southpark View have had funds suspended for \$12,845, \$29,230, and \$16,592 respectively. These three cities have not developed and submitted ethics codes. We also determined during our testing that codes were not on file at DLG for the cities of Buckhorn and Robards. DLG officials report that, because of an oversight, funds were not initially withheld from these entities. However, the situation has since been remedied and the two cities have submitted their codes as required by KRS 65.003.

DLG also reports an additional 46 cities and two counties had funds suspended at various times since January 25, 1995. Although DLG staff maintains a checklist of requirements for each code and general areas of non-compliance, the checklist does not state specifically why funds are suspended. In addition, DLG did not know the precise amounts of suspended funds for the additional cities and counties. As a result, we could not determine the reasons funds were suspended, nor the amount suspended.

DLG should maintain better records of its review of local ethics codes. DLG’s *Administrative Protocol for Local Government Ethics Ordinances* states that the receipt of an ordinance should be documented in a master log maintained by DLG. Such a log should include the receipt of the ordinance, the identity of the local government, the date the ordinance is received, and the results of DLG’ evaluation of compliance.

Chapter 1

What Are the Effects of KRS 65.003?

We asked DLG for a copy of the master log, but we received a memorandum instead. The memorandum revealed there are jurisdictions that have not complied with KRS 65.003 since January 1995, but it did not give specific reasons for the resulting suspension of funds. Additionally, dates for noncompliance were omitted for some entities. A master log should include specific information as described in the *Administrative Protocol for Local Government Ethics Ordinances*. Such a log would help DLG to track compliance and funds suspension information. Officials from DLG have agreed to maintain a computerized log in the future.

Training Inconsistencies

KRS 65.003 spurred several efforts to provide training to assist local officials in complying with the statute. However, these early workshops were confusing because they communicated inconsistent information.

The cities wrote their codes according to the training provided by KLC and Northern Kentucky University's Municipal Law Center, while the counties used information provided by KACo. KLC's training for cities was based on a handbook that included a model code, while KACo's handouts included options applicable to the various sections of the code.

KLC's coverage of the "Standards of Conduct Section" was very detailed. For example, KLC expressed the view that the section should apply to all elected and appointed officials, and employees. Our testing found that only 28% of cities did not include this statement. In contrast, 80% of counties did not include the statement.

Ethics statutes should specifically address training. The statute should specify the type of training, the entity providing the training, as well as the appropriate training content. In addition, we believe that annual training should be provided to local elected and appointed officials and employees by DLG, KLC, and KACo. These entities should also work together to determine the amount of resources needed to provide training, and communicate this information to the General Assembly at an appropriate time.

Problems Relating to Ethics Violations

The vagueness of the statute, as well as the general lack of compliance and specificity of codes, continues to burden the public's perception of local government ethics. As evident from the following examples, concerns about the ethical behavior of local officials remain subjects of public dialogue.

Financial audit comments relate to possible ethics violations

Various local ethics violations have been identified by this office and reported in local newspaper articles. Often they involve family members entering into contracts with local government officials. Comments in past financial audits conducted by this office included recommendations that local government ethics boards should review specific findings for possible violations of their ethics codes. The majority of these recommendations stemmed from related-party transactions at the county level. Examples include:

- The Bell County Attorney FYE 1996 Audit cited a possible violation of the county's ethics code because an agent of the Bell County Attorney's office purchased office furniture from the wife of the Bell County Assistant Attorney. The Cumberland Valley Regional Board of Ethics

Chapter 1

What Are the Effects of KRS 65.003?

found this to be in violation of the Bell county Code of Ethics and the involved party was issued a public reprimand.

- The Big Sandy Regional Detention Center FYE 1997 Audit cited possible violation of Johnson County's ethics code because the Detention Center purchased milk valued at \$12,718 from a brother of the Detention Center's administrator. To date, no response has been issued.
- The Bourbon County Fiscal Court FYE 1995 Audit cited a possible violation of the county's ethics code because laundry services for the courthouse were being provided by a magistrate's business. The Bourbon County Board of Ethics concluded that there was "nothing basically wrong with the procedure." Furthermore, the Board of Ethics reported that the relationship could not occur again because the magistrate had sold his business.
- The Bullitt County Fiscal Court FYE 1997 Audit cited a possible violation of the county's ethics code because a \$21,600 cleaning service contract was given to the sister of a magistrate. To date, no response has been issued.
- The Clark County Fiscal Court FYE 1996 Audit cited a possible violation of the county's ethics code because two magistrates were participating in related party transactions. The first questioned transaction involved a \$6,252 contract on road resurfacing given to a company owned by the brother of a magistrate. The second questioned transaction involved \$2,562 in expenditures made to a company owned by the son of a magistrate. The Clark County Ethics Committee found no violation of the ethics code.
- The Crittenden County Clerk FYE 1996 Audit cited a possible violation of the county's ethics code because a company owned by the county clerk was paid to paint the courtroom. The Crittenden County Ethics Board found no violation of the county ethics code.
- The Harrison County Fiscal Court FYE 1995 and 1996 Audit cited a possible violation of the county's ethics code because a company owned by the County Treasurer was awarded a contract to provide gas, oil, diesel fuel, grease, and other supplies to the county. The Harrison County Ethics Committee found no violation of the county ethics code.

Related Newspaper Articles

The August 19, 1998, edition of the *Lexington Herald-Leader* included an article about the Big Sandy Regional Detention Center Audit for fiscal year 1997. In this article, the newspaper reported that Johnson County did not have an ethics board at the time because, there being no complaints filed, its members had resigned. A similar article appeared in the *Winchester Sun* in July 1997 describing a related-party transaction cited in the audit of the Clark County Fiscal Court for fiscal year 1996. This article reported that the County Judge/Executive saw no reason for the ethics committee to review the matter.

Chapter 1

What Are the Effects of KRS 65.003?

Other standards of conduct issues have also attracted publicity. For example, a July 1998 *Lexington Herald-Leader* article described a city mayor who “borrowed” a city police car and drove it on vacation to Florida.

Recommendations

1. To ensure that local government ethics boards are active and enforce the provisions of KRS 65.003, we recommend that the General Assembly consider amending the statute to:
 - Develop a definition section.
 - Amend the Standards of Conduct section to apply to appointees and employees, as well as elected officials.
 - Clarify the specific requirements of filing a financial disclosure by wording the statute to (1) set the filing deadline, (2) identify who must file, (3) specify the financial disclosure contents, and (4) specify how and by whom the statements are to be received and handled.
 - Amend the Nepotism section of the statute by addressing actions that should be prohibited and annotating definitions of nepotism and family.
 - Prohibit the appointment of public officials to local ethics boards.
 - Grant subpoena power to ethics boards
2. Decisions related to the suspension of funds should be based on specific written criteria. A "master log" should be maintained in accordance with the *Administrative Protocol for Local Government Ethics*, noting the specific criterion relied upon to suspend funds, and the amount suspended.
3. KLC and KACo should work with DLG to approve and certify and provide annual training courses on ethical behavior and KRS 65.003. Such training should meet the requirements for salary adjustments for those officials listed in KRS 64.5275(6). These entities should also work together to determine the amount of resources needed to provide training, and communicate this information to the General Assembly at an appropriate time.
4. The General Assembly should consider appointing, by statute, an agency such as DLG to provide oversight and training on an annual basis to county and city officials and to ethics board members. In addition, it may wish to consider requiring that ethics boards meet periodically and report their work to the oversight agency at least once every year.

Chapter 1**What Are the Effects of KRS 65.003?**

5. The General Assembly should consider amending KRS 65.003 to more clearly identify the roles of the Attorney General and DLG related to compliance of local boards and codes.
6. The cities of Mockingbird Valley, Poplar Hills and Southpark View should comply with KRS 65.003(1) and adopt a code of ethics and submit it to DLG for review.

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

Summary

We identified the following types of ethics boards currently operating in the Commonwealth.

- Local ethics boards are boards comprised of one county or city. This is the most common type of ethics board operating in the Commonwealth.
- Countywide ethics boards are boards that are comprised of one county government and various cities within that county.
- Regional ethics boards are boards created through facilitation by an entity such as an authority or an Area Development District (ADD). They are comprised of multiple counties and cities within a defined region.

There are 99 county and 365 city ethics boards. In addition, ten countywide ethics boards and one regional ethics board operate under interlocal agreements as authorized by the Interlocal Cooperation Act. Two other regional ethics boards operate under Memoranda of Agreement outside the authority granted by the Interlocal Cooperation Act. The Act requires that such boards operate under an approved interlocal agreement.

Our surveys of counties and cities identified areas for concern. We found that enforcement bodies were not created in some jurisdictions, some boards did not distribute copies of codes to officials and employees, training varies from board to board, and the level of board activity ranges from frequent to seldom.

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

Statutory Criteria for Countywide and Regional Boards

KRS 65.003(2) states that “any city or county may enter into an agreement with one (1) or more other cities or counties, in accordance with the provisions of the Interlocal Cooperation Act, KRS 65.210 to 65.300, for joint adoption of a code of ethics which shall apply to all elected officials of the cities or counties, and to appointed officials and employees as specified by each of the cities or counties which enters into the agreement.”

KRS 65.210 to 65.300 permits local governmental units to make the most efficient use of their powers by enabling them to cooperate with other localities on a basis of mutual advantage and thereby to provide services and facilities in a manner and pursuant to forms of governmental organization that will accord best geographic, economic, population, and other factors influencing the needs and development of local communities.

KRS 65.240 (2) provides that any two (2) or more public agencies may enter into agreements with one another for joint or cooperative action pursuant to the provisions of KRS.65.210 to 65.300. It further says that appropriate action by ordinance or resolution of the governing bodies is necessary before any such agreement may enter into force.

KRS 65.260 is entitled "Limitations upon agreements – Approval by Attorney General -- Exemptions," Subsection (2) states:

“...every agreement made pursuant to KRS 65.210 to 65.300 shall, prior to and as a condition precedent to its entry into force, be submitted to the Attorney General who shall determine whether the agreement is in proper form and compatible with the laws of this state.”

House Bill 275 amends KRS
65.260

House Bill 275, passed during the 2000 Regular Session, amends KRS 65.260. Section 1 still states that agreements made pursuant to KRS 65.210 to 65.300 shall be submitted to the Attorney General “who shall determine whether the agreement is in proper form and compatible with the laws of the state.” However, language is added that provides “except for interlocal agreements between cities, counties, charter counties, urban-county governments, and sheriffs upon approval of the fiscal court which shall be submitted to DLG.”

KRS 65.290 provides that a certified copy of any agreement made pursuant to KRS 65.210 to 65.300 shall be filed with the county clerk of the county which is party to the agreement, the county clerk of the county wherein any other political subdivision of the state is located which is party to such agreement, and with the Secretary of State.

Types of Local Government Ethics Boards

Several Local Governments have formed countywide or regional ethics boards. Information from survey data and our file review indicated that there are 17 such boards in Kentucky. However, after gathering evidence from the Attorney General, Secretary of State, and county clerks, we determined there are only 10 countywide ethics boards and one regional ethics board operating in compliance with the requirements of KRS 65.210 through 65.300. Two regional ethics boards are operating through Memoranda of Agreements that were not approved as statutorily required by the Attorney General.

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

Countywide Ethics Boards

Countywide Ethics Boards are comprised of one county government and various cities within that county. For example, the Breckinridge County Interlocal Ethics Board is comprised of Breckinridge County, Cloverport, and Irvington. The following is a list of the counties that have approved interlocal agreements:

1. Boyle County
2. Breckinridge County
3. Carroll County
4. Daviess County
5. Fleming County
6. Hardin County
7. Henderson County
8. McLean County
9. Nelson County
10. Woodford County

Appendix IV provides member entities.

Some countywide ethics boards did not have agreements on file with the Secretary of State's office or the County Clerk's office

Of the ten countywide ethics boards, the counties of Boyle, Fleming, and Hardin do not have copies of their agreements on file with the Secretary of State's office. In addition, the city of Williamstown in Grant County does not have a copy of its agreement filed with the Grant County Clerk's office. Finally, the agreement for Kenton County does not list the city of Park Hills. As a result, these counties and cities are not in compliance with KRS 65.290, which requires such filing.

Regional Ethics Boards

Regional Ethics Boards, which are generally facilitated by an entity such as an authority or an Area Development District (ADD), encompass various counties and cities. The regional ethics boards are responsible for enforcing participating local governments' ethics codes. Only the Northern Kentucky Regional Ethics Authority is in compliance with the Interlocal Cooperation Act, since it operates under an approved interlocal agreement. The following is a list of the entities that have regional boards:

1. Northern Kentucky Regional Ethics Authority
2. Barren River Area Development District (BRADD)
3. Cumberland Valley Area Development District

Appendix IV includes member entities.

Two regional ethics boards are out of compliance with the Interlocal Cooperation Act

The Barren River ADD and the Cumberland Valley ADD regional ethics boards are operating without an approved interlocal agreement. Instead, they are operating under Memoranda of Agreement, which are not in compliance with the provisions of the Interlocal Cooperation Act.

The Barren River ADD submitted a draft of its agreement for approval to the Attorney General in September of 1994. At that time, the Interlocal Cooperation Act required that every agreement made pursuant to KRS 65.210 to 65.300 "...shall, prior to and as a condition precedent to its entry into force, be submitted to the Attorney General who shall determine whether the agreement in proper form and compatible with the laws of this state."

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

Subsequently, the Attorney General opined that the draft agreement was not compatible with the laws of the Commonwealth. Concerns were expressed about the lack of standards, requirements, qualifications, and criteria for membership on the board, as well as the ADD's involvement in setting up an enforcement board for which no membership guidelines exist. As a result of the opinion from the Attorney General, BRADD officials facilitated the development of a regional ethics board through a Memorandum of Agreement, but did not resubmit the agreement to the Attorney General for approval.

An official from the Barren River ADD stated that because of the cumbersome process of approving interlocal agreements, it developed the Memorandum of Agreement. He also stated that the ADD opted to provide an administrative support mechanism to help member governments comply with KRS 65.003.

Member governments were encouraged by BRADD to include a reference in their individual ordinances to the regional ethics board as the independent enforcement authority, which would require the disclosure forms and act on complaints. However, as pointed out by the Attorney General, the agreement did not specifically address the membership of the enforcement authority.

Providing services for enforcement is not a purely administrative function. Therefore, it is important that all agreements governed by KRS 65.003 be submitted for review as required by the Interlocal Cooperation Act.

The Cumberland Valley ADD said its Memorandum of Agreement was modeled and drafted after Barren River ADD's agreement, and was not submitted to the Attorney General for review. Cumberland Valley ADD's agreement should also be submitted for a formal review.

It is important for both ADDs to resubmit their agreements for approval. Without doing so, there is a potential that decisions made by these regional boards could be subject to legal challenge.

KRS 65.260, as amended, makes DLG the primary agency responsible for determining proper form and ascertaining compliance with state law for interlocal agreements between cities, counties, charter counties, urban county governments, and sheriffs upon approval of the fiscal court.

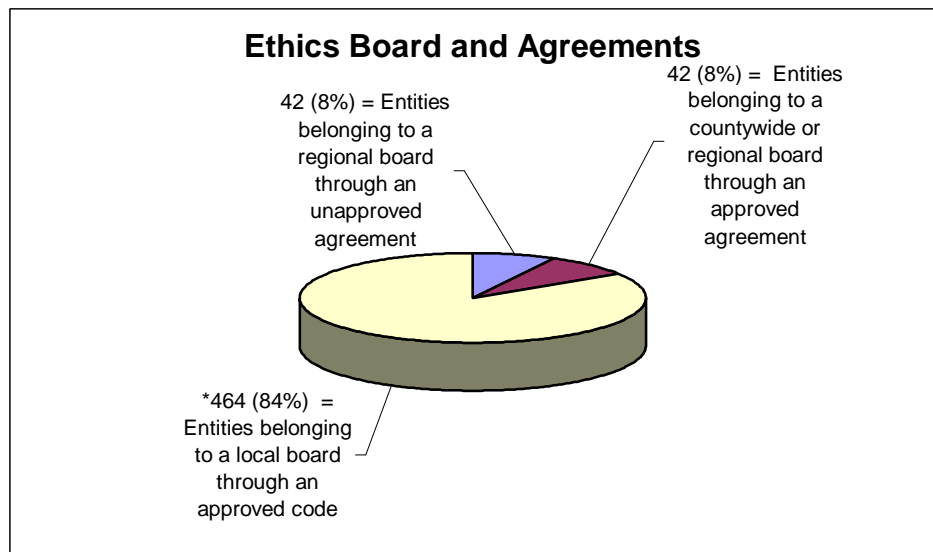
Countywide and regional ethics boards should comply with the letter of the law by drafting and submitting agreements for approval. This ensures that countywide and regional ethics boards are in strict compliance with KRS 65.260. If draft agreements are not approved ADDs or other responsible entities should take appropriate action to ensure that all concerns expressed by the Attorney General or DLG are addressed.

Few Cities or Counties Have Chosen to Join Countywide or Interlocal Ethics Boards

Figure 1 provides an analysis of the makeup of the local ethics boards and agreements. It profiles:

- Local entities that are members of countywide and regional boards,
- Local entities that are members of a regional board by Memorandum of Agreement, and
- Individual boards.

Figure 1: Ethics Boards and Agreements



Source: Offices of Attorney General, Secretary of State, and local County Clerks
*This represents the number of codes that include provisions for a board.

Countywide and Regional Ethics Boards May Reduce Local Conflicts of Interests and Facilitate Oversight

KLC wrote in its handbook that one of the most critical, and perhaps one of the most difficult, aspects of developing the ethics code would be the creation of an effective enforcement mechanism. KLC went on to state that a joint undertaking may be the most cost effective and efficient way for many small cities and counties to comply with the requirements.

KLC further explained that regional board representation might eliminate the potential problems that arise when a local government creates its own enforcement body. The costs of compensation or expenses for the person or group designated to enforce the code, as well as supplies, meeting, and storage space, are all shared by members of regional boards. Regional boards may also serve to produce a more independent enforcement body. A representative from a regional board explained that its members are made up of representatives from each local government, and that these members are restricted from voting on issues involving their particular city or county.

As shown in Figure 1, the majority (464) of local jurisdictions in the Commonwealth do not belong to a countywide or regional ethics board. As result, it is more cumbersome to oversee their activities.

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

According to officials from KLC and BRADD, some positive benefits related to a countywide or regional approach include decreased costs and increased consistency. For example, countywide or regional boards would be easier to oversee than the 464 individual boards that currently exist. Although DLG and local officials are concerned that centralization would detract from the concept of home rule, proper representation from city and county officials on countywide or regional boards would help to retain local autonomy.

Countywide and Regional Ethics Boards Should Develop a Unified and Specific Code

The KLC/KACo joint proposal recommends that local boards consist of 3 to 5 members. The proposal says that in the case of joint boards, the members should be appointed as specified in the written agreement as required by the Kentucky Interlocal Cooperation Act. The joint proposal recommends that a citizen sit on the board and that the local legislative body approve all appointments. It also recommends that the ordinance give the boards the following powers:

- To hold hearings regarding alleged violations of the local ethics codes;
- To issue subpoenas for the production of documents and the attendance of witnesses;
- To forward to appropriate agencies of state and local government information concerning violations which may be used in criminal or administrative proceedings;
- To enforce the provisions of the local code of ethics with regard to local government officers and employees and to impose penalties for violations as authorized; and
- To adopt rules and regulations necessary to implement the local ethics codes.

In addition to being more cost effective for cities and counties, joint undertakings such as the creation of countywide and regional boards may also foster consistency of policy and application.

For example, countywide and regional boards are more likely to develop a single code for member entities. During discussion of the use of the Interlocal Cooperation Act, the KLC handbook explains that

“The language...of the bill, although somewhat vague, appears to require the participating governments to jointly adopt a single ethics code.” Our compliance testing confirmed this interpretation by local jurisdictions. Of the 13 countywide and regional ethics boards, 8 (62%) use one code for member cities and counties.

Citizens should consider the benefits of regionalizing local ethics boards and the General Assembly should consider amending the ethics statute. KRS 65.003 should be amended to establish countywide or regional ethics boards, or a single statewide ethics board as used in some states.

Surveys Sent to Local Governments

We surveyed county and city officials and board members to obtain information about enforcement bodies, training, ethics codes, and the activity level of ethics boards. The following is a brief description of the surveys:

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

Survey 1: We sent 552 surveys to 120 county judge/executives and 432 city mayors. 230 cities (53%) and 81 counties (68%) responded to our survey, for an overall response rate of 56%.

Survey 2: We sent a second survey to a sample of 56 of the original 552 survey recipients. We surveyed 37 cities, 17 counties, and two regional ethics boards. We received an overall response rate of 55% or a return of 31 surveys. Eighteen cities, eleven counties, and two regional ethics boards responded.

Surveys Conclude Inactive Ethics Enforcement Bodies

The first survey responses revealed that 3 counties and 16 cities had not established a board. According to a DLG official, these counties and cities included provisions in their codes to establish enforcement boards, but may not have actually created them. The number of members on existing boards ranged from one to thirteen.

In our second survey, comments such as the following made by local officials depict a great need for further awareness of the responsibilities of local ethics boards:

- "There has been no ethics commission for several years for the city. After receiving this survey I checked and we are required by ordinance to have one. I will do my best to re-establish one very soon."
- "The statute should be revised to permit coverage for joint boards and commissions..."
- "Concern is that residents of community not aware of Ethics Committee. Evident in lack of resident activity. Presence of Ethics regulations is intimidating enough to keep rules."

Surveys Conclude That Most Boards Distribute Copies of Codes to Officials and Employees

We asked whether the local entities are distributing the ordinance (code) to local officials and employees, and whether they are training board members on its content. The varied answers are displayed in the following table:

Table 2: Survey Response from Local Governments Regarding Distribution of Ordinance (Code) to Officials and Employees

RESPONSES	All local officials receive a copy of the code		All employees receive a copy of the code	
	County	City	County	City
Yes	63	195	53	186
No	10	27	20	36
BRADD (provides)	3	1	3	0
NKADD	0	1	0	1
Copy Available Upon Request	2	0	2	0
On file in each office	1	0	1	0
Does Not Apply	1	4	1	6
Most have copy	1	0	1	0
Other	0	2	0	1
TOTAL responses	81	230	81	230

Source: Information obtained from city and county surveys.

Chapter 2

What Types of Local Government Ethics Boards Exist and Are They Active?

The majority of cities and counties are ensuring that local codes are available to officials and employees.

Training Varies from Board to Board

Some local governments provide training programs for ethics board members or provide members with the means to attend training sessions provided by other organizations. In an attempt to target local training efforts, we asked, "What training do you provide to members of the Ethics Board?" Table 3 shows the responses.

Table 3: Summary of Training Provided by Local Governments to Their Ethics Board Members

RESPONSES	What training is provided?	
	County	City
None	35	59
Does Not Apply	14	57
BRADD (provides the training)	3	2
Not Sure	4	2
Annual Training (regardless of trainer)	5	3
STATE/DLG/KLC (cities) -no timeframe given	2	10
ADD/Regional Boards	4	22
County Attorney/City Attorney	5	14
Review Ordinance (but does not say training is given)	4	37
Recommend/Encourage Training (but does not say training is given)	4	6
Other (ambiguous, could not categorize)	1	18
TOTAL responses	81	230

Source: Information obtained from city and county surveys.

Local governments generally reported no formal training. Of the total governments responding, 71 (23%) said that training *did not apply*.

Some local governments, however, have taken commendable steps in ethics training. From our survey, we note the following examples:

- Jefferson County's ethics board members receive annual training that includes a review of the requirements of the ethics code and discussion questions based on hypothetical situations or cases that have actually arisen.
- Hardin County reported that its county attorney and city attorneys provide ethics training.
- Franklin County appropriates funds for ethics board members to attend training seminars.
- Whitley County reported that it had annual training sessions for ethics board members.

Ideally, training should be provided by an oversight agency such as DLG, which can ensure that all entities receive consistent, relevant, and high-quality training.

**Surveys Show That
Board Activity Varies
Widely**

One of our objectives was to find how active the local government ethics boards are and how seriously the members of the boards approach their duties. After determining from the first survey that some entities had not established boards, we sent a second survey that asked questions about board activity and enforcement.

The following is a summary of 31 respondents from our second survey results.

- Twelve (39%) said their ethics board met only "as needed." Twelve others answered that their board meets regularly, annually, bi-annually, quarterly, or monthly. Two said their boards had never met. Five did not answer the question.
- Seventeen (55%) either did not answer or reported that their ethics boards had not met during the last 12 months. Of the seventeen, five (29%) did not answer and 12 (71%) did not meet. The remaining 14 (45%) reported from 1 to 12 meetings during the last year.
- Sixteen (52%) responded that the ethics board chairperson has the authority to call a meeting.
- Twenty-two (71%) said they maintain records. However, only 20 (65%) said the records are available to the public.

Recommendations

1. To ensure that local government ethics boards are active and enforce the provisions of KRS 65.003, we recommend that the General Assembly consider amending the statute. It may also wish to consider providing for various degrees of ethics requirements based on size and population of cities and counties. For example, strict nepotism provisions may hinder smaller jurisdictions. Suggestions for amending KRS 65.003 are as follows:
 - Address the consolidation of local ethics boards into countywide, regional, or a statewide board.
 - Require local ethics boards to meet at least semi-annually.
 - Designate an agency to oversee the activities of the boards.
 - Require training for boards, officials, and employees
 - Require local governments to distribute codes to all board members and all employees.
2. The Barren River and Cumberland Valley ADDs should resubmit their regional ethics codes to the Attorney General or DLG for review.
3. Countywide and regional ethics boards should develop single ethics codes for member jurisdictions.
4. The countywide ethics boards for Boyle, Fleming, and Hardin counties should file copies of the interlocal agreements in the Secretary of State's Office. In addition, the city of Williamstown should file a copy of its interlocal agreement with the Northern Kentucky Regional Ethics Authority in the Office of the Grant County Clerk. Finally, the interlocal agreement for Kenton County should be updated to list the city of Park Hills.

Chapter 3

How does Kentucky compare with other states?

Summary

Many states have attempted to address the issue of local government ethics. Some states have retained administration and control over the local government ethics apparatus, some have delegated to local governments discretion over the administration and control, and others have not addressed the issue of local government ethics.

Best Practices In Local Government Ethics

The following best practices in local government ethics in other states are compared to Kentucky policies and procedures:

- A. West Virginia's Governmental Ethics Act, in contrast to Kentucky's, clearly applies to "...all elected and appointed public officials and public employees, whether full or part time, in state, county, and municipal governments and their respective boards, agencies, departments and commissions and in any other regional or local governmental agency, including county school boards."
- B. The Georgia Municipal Association (GMA) is promoting the International Municipal Lawyers Association's (IMLA) Model Ordinance on Ethics. This ordinance requires an annual report summarizing Board of Ethics activity to be filed with the city governing body. Kentucky's law is silent on meeting frequency and reporting requirements.
- C. Statewide ethics boards in New Jersey and West Virginia possess subpoena power. Kentucky ethics boards do not have the authority to issue subpoenas.
- D. Oregon and West Virginia grant one state agency the authority to enforce state and local ethics laws. Kentucky's ethics apparatus consist of hundreds of ethics bodies.
- E. In New Jersey local governments may form their own ethics boards by duplicating the state's model ethics statute as their ordinance. In Kentucky, local jurisdictions are responsible for the development of their own codes.
- F. Ohio and Oregon limit employment after local government service in order to reduce the possibility of conflicts of interest during the government tenure. Kentucky's Executive Branch Ethics Commission enforces a similar provision for the state's executive branch of government.
- G. Illinois and other states have in their standards of conduct a gift ban for local government officials. Kentucky is silent on this issue.
- H. North Carolina has a statute that addresses misuse of confidential information by local public officials and employees. Kentucky also prohibits, through statute, misuse of confidential information by local officials and employees.

Chapter 3

How does Kentucky compare with other states?

- I. New Jersey has a provision in its local ethics statute prohibiting an official from using his public position to secure for himself or others unwarranted privileges. Kentucky also addresses the general matter of official misconduct by public officials.
- J. The Ohio Ethics Commission provides ethics education and reference materials and recommends ethics legislation. The Commission has the authority to interpret the ethics law and related statutes and issue opinions. If the person making the request for an advisory opinion complies with it, he is fully insulated from criminal or civil action. In Kentucky, the statutes are silent on training related to the local ethics system.
- K. Kentucky's local ethics boards are subject to provisions of the Open Records and Open Meetings laws as are other public agencies. In addition, the Attorney General issued an open records decision (99-ORD-219) on December 14, 1999 which states that a provision in a local ordinance establishing a local ethics code and board that purports to allow the board to issue confidential advisory opinions, is a violation of the Open Record Law and cannot stand. Application of Open Records and Open Meetings laws to local ethics boards helps to ensure that the public is informed related to local ethics concerns.

Description of Local Government Ethics in Other States

As mentioned previously, ethical standards for public officials are governed by four distinct ethics systems in Kentucky: executive, legislative, and judicial branches and a decentralized system for local government. Separate laws and rules govern each system. Although each framework was intended to increase ethical behavior, the inconsistency and confusion resulting from separate systems lessens the impact of a consistent and integrated ethics framework.

Other states we reviewed have addressed local ethics in a variety of ways. Although most states we examined have implemented laws that govern local officials and employees, there are distinct differences related to their systems.

Georgia

Established in 1974, the Georgia State Ethics Commission has statewide oversight that includes both state and local elected officials and state employees. The Commission's jurisdiction extends to personal and campaign finance disclosure, gift disclosure (up to \$250 per year is permitted), and lobbying activities regarding state and local government. Originally, its jurisdiction only included campaign finance disclosure. Lobbyist registration was added in 1992 and the vendor-gift provisions were added in 1996. Powers of the Commission include conducting investigations, reporting suspected violations of the law to appropriate law enforcement authorities, issuance of advisory opinions, and enforcement of penalties.

Georgia does not require or regulate local ethics boards. However, the Georgia Municipal Association (GMA) has been making an effort to encourage the establishment of local ethics ordinances through its "Certified City of Ethics" program. A task force comprised of both public and private officials developed the program, which was approved by the GMA Board of Directors in June 1999. To become a "Certified City of Ethics," a city must take two official steps. First,

Chapter 3

How does Kentucky compare with other states?

it must adopt a resolution establishing the following five ethics principles for the conduct of city officials:

- Serve others, not ourselves;
- Use resources with efficiency and economy;
- Treat all people fairly;
- Use the power of our position for the well being of constituents; and
- Create an environment of honesty, openness, and integrity.

The second step cities must take is to adopt an ethics ordinance that meets minimum standards approved by the GMA Board of Directors. An ordinance must contain definitions, an enumeration of permissible and impermissible activities by elected officials, due process procedures for elected officials charged with a violation of the ordinance, and punishment provisions for those elected officials found in violation of the ordinance. GMA recommends that cities use the model ethics ordinance of the International Municipal Lawyers Association.

The IMLA Model Ordinance on Ethics “applies to all public servants.” A “public servant” is defined to include any member of a city governing body or city agency, board, commission, committee or other voting body, as well as any elected or appointed city official, employee, volunteer or city contractor. The model ordinance includes a Board of Ethics. The board is required to file an annual summary of its activities with the city governing body, develop an ethics education program and ethics handbook for public officials, conduct ethics hearings as it deems appropriate, and render advisory opinions upon request or upon its own initiative.

The model also includes limitations upon the board’s power, including a clause prohibiting the reversal of actions taken by the mayor, governing body, or other officers or employees of the city. The model requires several different classes of officials to file financial disclosure statements, including elected officials and candidates for office, department heads, division superintendents in the public works department, full-time appointed exempt employees, and employees whose work involves purchases or contracting and other finance related activities. Finally, the model act prohibits conflicts of interests and use of public position for personal benefit. Conflicts of interests or potential conflicts must be disclosed.

While the program is less than one year old, GMA staff report that out of 537 municipalities in Georgia, forty-nine have applied to participate in the “Certified City of Ethics” program. To apply, cities must send their resolutions and ordinances to GMA, whereupon they are forwarded to the Executive Committee of the GMA City Attorneys Section. If the panel decides that submissions meet the criteria, the ethics certification is conferred. As of May 11, 2000, thirteen cities had been recognized as “Certified Cities of Ethics.” Twenty-one municipalities have submitted ethics codes that were still under review and fifteen other cities must submit additional information to GMA before their applications are actively considered.

Chapter 3

How does Kentucky compare with other states?

Illinois

Illinois' State Gift Ban Act took effect on January 1, 1999. The legislation mandates that, except as provided in the act, no member of a legislative body, officer, or government employee may solicit or accept any gift from a prohibited source or in violation of any federal or state statute, rule, or regulation. The ban applies to spouses and immediate family members living with the legislator, officer, or employee. With regard to units of local governments and school districts, the act says that they must prohibit the solicitation and acceptance of gifts and must enforce those provisions in a manner that complies with the act. Non-salaried appointed or elected officials may be exempted.

The act requires all units of local government and school districts to adopt their own policies prohibiting the solicitation and acceptance of gifts by July 1, 1999. The policies must be "substantially in accordance with the requirements" of the state gift ban. Local gift bans must be no less restrictive than the state gift ban. At a minimum, all full-time, part-time, and contractual employees and salaried appointed and elected officials of units of local government and school districts are subject to the prohibitions under the act.

The impact of the act upon local governments was sufficiently in question that it was the subject of an opinion by the Illinois Attorney General. According to the Attorney General, however, the State Gift Ban Act merely states that units of local government and school districts shall enforce prohibitions in a manner in compliance with the act. Local governments and school districts do not have to establish an ethics board if they already have one in place or may readily create an adjudicatory body with the ability to conduct hearings and protect the due process rights of persons who are the subject of complaints.

Massachusetts

The Massachusetts conflict of interest statute was enacted in 1963 to regulate the conduct of public officials and employees at both the state and local levels. Chapter 268A limits what public employees may do at work, after hours, and after leaving public service, and it sets standards of conduct required of all state, county, and municipal employees and officials. Until 1978, Chapter 268A was enforced as a criminal matter under the jurisdiction of the state Attorney General and local prosecutors. In general, the conflict of interest law prohibits public officials and employees from asking for or accepting anything, regardless of value, if it is offered in exchange for performance of an official act. It also prohibits acceptance of anything worth \$50 or more. Furthermore, public officials and employees may not hire, promote, supervise, or otherwise participate in the employment of immediate family members or immediate members of their spouse's family, nor may they take any type of action impacting the financial interests of themselves or immediate family members.

In 1978, the Massachusetts legislature added Chapter 210, which established the State Ethics Commission and empowered it to interpret and enforce Chapter 268A. Chapter 210 also includes a financial disclosure law that requires public officials, political candidates, and some public employees to file an annual statement of financial interest and private business associations.

The Massachusetts Ethics Commission is divided into four divisions. The Legal Division provides advice to public employees regarding the legality of proposed activities and represents the Commission in court. The Statements of Financial

Chapter 3

How does Kentucky compare with other states?

Interests Division administers the financial disclosure law and audits financial interest statements. The Public Education Division conducts ethics seminars for public employees and publishes ethics education materials. The Enforcement Division investigates and prosecutes alleged violations of the law.

Missouri

Missouri's Ethics Commission was established in 1991. The Commission is responsible for enforcement of Missouri's conflict of interest, lobbying, and campaign finance disclosure statutes. It receives and reviews complaints alleging violations of these laws. After investigating a complaint, the Commission may refer the case to the appropriate prosecutor or disciplinary authority along with recommendations for sanctions, or it may undertake hearings and enforce its own sanctions.

The conflict of interest statute explicitly prohibits certain acts by elected and appointed public officials and employees of the state and its political subdivisions, including:

- Gifts or campaign contributions given in return for performance of an official act;
- Use of confidential information obtained in the course of employment or official capacity to secure financial gain for himself, his spouse, his dependent child, or any business with which he is associated;
- Disclosing confidential information obtained in the course of employment or official capacity with intent to secure financial gain for himself or another person;
- Use of decision-making authority for the purpose of obtaining financial gain which materially enriches himself, his spouse, or dependent child by acting or not acting for the purpose of extorting or coercing anything of pecuniary value from another person; and
- Favorably act on any matter specifically designed to provide monetary benefit to an official, his spouse, or a dependent child.

Members of governing bodies of political subdivisions are explicitly prohibited from:

- Performing any service for a political subdivision or agency of a political subdivision for consideration other than compensation provided for performance of official duties;
- Selling, renting, or leasing any property to the political subdivision or any agency of the political subdivision except in certain limited circumstances; or
- Attempting to influence the decision of any agency of the political subdivision on any matter for compensation, except compensation provided for performance of official duties.

Missouri law also requires members of the governing bodies of political subdivisions to file a written report with the clerk of the governing body whenever an ordinance or measure is proposed in which the member has a substantial personal or private interest before passing on voting.

Chapter 3

How does Kentucky compare with other states?

New Jersey

New Jersey enacted its Local Government Ethics Act in 1991. The act includes provisions for elected local officials, appointees, and employees. Elected officials, appointees, and zoning board officers are required to file financial disclosure statements. The act also features a Code of Ethics that explicitly prohibits a local government officer or employee from using his official position to secure unwarranted privileges for himself or others, or from acting in an official capacity regarding a matter where he, a member of his immediate family, or a business organization in which he is involved has an interest.

The powers of the Local Finance Board include receiving complaints and holding hearings regarding possible violations of the law, issuing subpoenas for the production of documents and witnesses, hearing appeals from local ethics boards, forwarding information about possible criminal violations to the Attorney General or local prosecutor, rendering advisory opinions about whether certain situations might constitute a violation of the act, and enforcement of the act through fines or other disciplinary action.

New Jersey's local ethics law is unusual in that it gives local governments the option of whether to initiate their own local ethics ordinance and board. The local ordinances may be more stringent than the state law but not less stringent. If the local ordinance is not identical to the state statute, it must be submitted for approval to the Local Finance Board.

North Carolina

North Carolina's State Board of Ethics possesses statutory authority to regulate the conduct of local government officials but does not have a local government ethics board statute or any state agency that directly oversees local government ethics issues.

State law prohibits any person appointed or elected to a position of public trust at the state, county, or municipal level of government from using the position to enter a contract in which he might profit in any way. It is a misdemeanor for local officials to willfully fail to discharge their duties. It is unlawful for any officer or employee of the state or any subdivision of the state to use confidential information available to him through his public position for his private benefit. State or local government employees are prohibited from any private use of publicly owned vehicles. Any public officer who appropriates state, county, school, or city taxes to his own use is guilty of embezzlement and must be punished as a felon.

Ohio

The Ohio Ethics Commission was established in 1974. The Commission has four responsibilities:

- Public information
- Advisory opinions
- Investigations and referrals for prosecution
- Financial disclosure

The Commission confidentially investigates complaints and charges of alleged violations under the state ethics statute. At the conclusion of an investigation, the Commission may refer the matter to a prosecutor or settle the case with the accused. The law requires elected state and local officials, candidates for office,

Chapter 3

How does Kentucky compare with other states?

and certain high-ranking state employees to file financial disclosure forms. Local governments may have their own ethics boards but their standards may not be lower than those of the state. The state does not regulate local ethics boards. All public officials and employees in Ohio are subject to the ethics law. These statutes are generally criminal in nature and prohibit public officers and employees from misusing their official positions for their own personal gain or for the gain or benefit of family members, business associates, or in other instances where there is a conflict of interests.

Oregon

Oregon's Government Standards and Practices Act of 1974 declares that "public office is a public trust" and requires all public officials to adhere to the code of ethics. The act broadly defines "public official" to include any person serving the state or any of its political subdivisions or other public bodies of the state as "an officer, employee, agent, or otherwise," regardless of whether the person is compensated. The act prohibits public officials from using or attempting to use a public position or office to secure financial gain or avoid financial detriment that would not be available if the official did not hold a public position.

The act also established the Oregon Government Standards and Practices Commission. The Commission may investigate alleged violations of the ethics statute and may conduct hearings and assess fines as penalties. The Commission may also issue and publish opinions regarding the ethics statute upon written request by a public official. Officials following the Commission's advisory interpretations are not liable under the act. It is required to publish a manual on government ethics to explain the requirements of the ethics statute. The Commission is also required to prepare and present a continuing education program on ethics for public officials and lobbyists.

Virginia

While Virginia does not have a state ethics board or require local governments to have ethics boards, it does have a State and Local Government Conflict of Interest Act. Questions about ethics are interpreted by the Virginia Attorney General, a local prosecutor, or a local government attorney. Officials may write advisory opinions on ethics issues. Furthermore, the Attorney General and local prosecutors are given responsibility for enforcing the act. Any person who knowingly violates this act is guilty of malfeasance in office or employment. Conviction could lead to forfeiture of office or employment, fines, or other penalties.

Virginia's conflict of interest law applies to state and local elected officials, appointees, and employees. Prohibited conduct includes:

- Soliciting or accepting anything of value in exchange for official duties aside from salary;
- Using confidential information obtained through a public position for one's own economic benefit;
- Accepting anything that reasonably tends to influence one in performance of official duties; and
- Acceptance of gifts from persons who have interests that may be affected by the recipient's performance of official duties.

Chapter 3

How does Kentucky compare with other states?

The law also limits the ability of local officials and employees to enter contracts with local government, and requires many local officials and employees to file personal financial disclosure forms.

West Virginia

West Virginia enacted its Governmental Ethics Act in the 1980s. It is a comprehensive act in that its provisions apply to all elected and appointed public officials and public employees in state or local government, including county school boards. The act established the West Virginia Ethics Commission. The Commission has the power to subpoena witnesses and compel their attendance and testimony, as well as subpoena books, papers, records, or other evidence. The Commission may issue advisory opinions upon written request.

The Commission is also empowered to accept and investigate complaints regarding ethics issues. If the Commission finds evidence beyond a reasonable doubt that there has been a violation of the state's ethics act, the Commission may issue a public reprimand, a cease and desist order, an order of restitution for money, or fines up to \$1,000. Decisions involving sanctions may be appealed to the Circuit Court of the county in which the state capitol is located or the county where the violation is alleged to have occurred.

Officials and employees may not use their offices for their own private gain or the gain of others. Officials and employees may not solicit gifts for their own benefit or the benefit of family members and may not have an interest in a contract into which they have a direct authority, nor may a member of his family have such an interest.

The act also limits the ability of a former official or employee to represent a client before a public agency in a matter in which the former official or employee was involved. Furthermore, a former public official or staff attorney or accountant may not represent a client before a public board or agency in certain matters during or within six months of termination of public service or employment.

Most elected officials and candidates must file annual financial disclosure statements, except for cities that have opted, by ordinance, not to participate in the financial disclosure provisions of the act. The Commission may petition the appropriate Circuit Court to appoint a special prosecutor in cases where there is a pattern of ethics violations and the appropriate local prosecutor is not able to take action. Finally, the act requires the registration of lobbyists.

Recommendations

1. As the General Assembly considers amending KRS 65.003 it should also consider replicating best practices from other states mentioned in this chapter.

Scope

We conducted our audit in accordance with generally accepted government auditing standards. The audit's purpose was to determine the effect that KRS 65.003 has had on local government ethics and to determine the types and activity of local ethics boards. The scope of this audit included all Kentucky counties (120) and all incorporated cities (432). One additional city was included in testing that has since been dissolved.

Methodology

To document all of the provisions contained in local government ethics codes, we interviewed DLG staff responsible for determining compliance with KRS 65.003, and staff responsible for the suspension of funds due to noncompliance. We also obtained and reviewed all county and city ethics ordinances on file at DLG. In addition, we reviewed the following materials:

- KRS 65.003 and subsequent amendments;
- Letters sent to local governments by DLG discussing local ethics code provisions;
- Articles discussing ethical issues in local newspapers since January 1995; and
- Referrals sent by our office to local ethics boards and the outcome of these referrals.

We conducted interviews with staff from the following organizations:

- Barren River Area Development District
- Kentucky League of Cities
- Kentucky Association of Counties
- National Association of Counties
- National Association of Cities

We also made calls to various local entities to clarify information when necessary.

Exploring the Intent of KRS 65.003

To interpret and chronicle the history of KRS 65.003, we reviewed documents obtained from various agencies and associations. Among those reviewed are the following:

- *Kentucky League of Cities Local Government Handbook*
- *Administrative Protocol for Local Government Ethics Ordinances*
- *Local Government Ethics Issues for Legislative Considerations*
- *Opinions of the Attorney General*
- *Proposal for a Local Government Code of Ethics," Kentucky League of Cities*
- *Joint Proposal for a Local Government Code of Ethics, Kentucky League of Cities and Kentucky Association of Counties*
- *Model Ordinance Code of Ethics, Kentucky Association of Counties*

Surveys

In order to determine the involvement of local entities regarding local ethics boards and ordinances, we sent surveys to county judge/executives, city mayors, and ethics board chairpersons. The first survey was sent to all local officials. Subsequent survey questionnaires were sent to a sample of local entities.

Questions regarding board members, activity of board, training, etc., were asked. We summarized and categorized the answers to the surveys. We did not verify survey responses.

Countywide and Regional

To determine whether countywide and regional ethics boards were in compliance with the statutory requirements of the Interlocal Cooperation Act, we performed the following procedures:

- Interviewed the OAG attorney who reviewed interlocal agreements for compliance;
- Reviewed KRS 65.210 through 65.300;
- Obtained interlocal agreements that had been filed with the Secretary of State's Office; and
- Called the county clerk of each entity member of countywide and regional boards to determine whether a copy of the agreement was on file reflecting board membership, and obtained copies of those filed agreements.

Research for Best Practices

By benchmarking common standards found in other states, we identified best practices that should be used in a local government codes of ethics. We reviewed statutes and other information relating to local government ethics from the following states:

- Georgia
- Illinois
- Massachusetts
- Missouri
- New Jersey
- North Carolina
- Ohio
- Oregon
- Virginia
- West Virginia

In addition to obtaining the information noted above, we conducted interviews with officials from Georgia, New Jersey, North Carolina, and Ohio. We also reviewed documents relating to local ethics issues from the following organizations:

- The Center for Ethics in Government and Advocacy, National Conference of State Legislators
- National League of Cities
- National Association of Counties
- International Municipal Lawyers Association
- Georgia Municipal Association
- Kentucky League of Cities
- Kentucky Association of Counties
- Local Government Law Center



EDWARD B. HATCHETT, JR.
AUDITOR OF PUBLIC ACCOUNTS

2501 Georgetown Road, Suite 2
 Frankfort, Kentucky 40601
 Telephone: 502-573-0050
 Fax: 502-573-0067

Prepared by: _____
 Date: _____

Reviewed by: _____
 Date: _____

Title: Checklist for Local Government Ethics Codes

Purpose: To review each local government ethics code related to KRS 65.003. It should be noted that discrepancies in local codes do not necessarily mean that the county or city is not meeting the requirements of KRS 65.003. Shaded areas represent statutory provisions that could be more specific and clear.

Applicable Statutes And OAG Opinions KRS 65.003, KRS 67.076, KRS 83A.060, KY OAG 95-16, KY OAG 94-69

Name of Local Government: (Very important to note whether you are reviewing a city or county code since Kentucky has several cities and counties with the same name)

City _____

County _____

(Circle appropriate answer)

<p>1. Does the code contain a STANDARDS OF CONDUCT section as specified in KRS 65.003 (3)(a)?</p> <p>If a general section on standards of conduct is present, answer YES. The section may not be marked as such. If there is no section specifically marked as standards of conduct, look for provisions related to what officials and/or employees can and cannot do.</p> <ul style="list-style-type: none"> • KY OAG 95-16 <ul style="list-style-type: none"> a. Does the standards of conduct section apply to elected officials? <p>Although there has been a difference of opinion over the requirements of KRS 65.003 related to who exactly the codes of ethics should apply to, the statute clearly states the codes "shall apply to all elected officials of the city or county..." KY OAG 95-16 does not question the applicability of codes to elected officials.</p>	<table border="0"> <tr> <td>YES</td> <td>NO</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO			YES	NO				
YES	NO										
YES	NO										
<i>Statutory Provisions That Could Be More Specific And Clear</i>											
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> b. Does the standards of conduct section state that it explicitly applies to elected officials, appointed officials, AND employees? <p>Documentation obtained by our office indicates that the intent of the legislation was to include both elected and appointed officials as well as employees. DLG, upon developing an administrative protocol to oversee the implementation of KRS 65.003, had apparently worked closely with the sponsoring legislator who verified it was his intent to include appointed officials and employees. Separate documentation provided by the Kentucky League of Cities (Local Government Ethics Handbook, page 35) explained to municipalities that standards of conduct <u>must apply to all elected and appointed officials and employees</u></p>	<table border="0"> <tr> <td>YES</td> <td>NO</td> </tr> <tr> <td colspan="2">If NO, standards of conduct do not apply to:</td> </tr> <tr> <td colspan="2">Elected Officials</td> </tr> <tr> <td colspan="2">Appointed Officials</td> </tr> <tr> <td colspan="2">Employees</td> </tr> </table>	YES	NO	If NO, standards of conduct do not apply to:		Elected Officials		Appointed Officials		Employees	
YES	NO										
If NO, standards of conduct do not apply to:											
Elected Officials											
Appointed Officials											
Employees											
<p>However, after investigating an ordinance submitted to DLG, which did not include employees as being subject to the standards of conduct, the past Commissioner of DLG requested an opinion on the exact requirements of the statute. The Office of the Attorney General issued KY OAG 95-16 concluding, "... therefore that KRS 65.003 does not require local governments to adopt a code of</p>											

<p>ethics containing standards of conduct for every appointed official and employee.”</p> <p>The OAG opinion differed from the early interpretations by DLG and KLC. Testing included this question in order to gain insight into the above circumstances.</p> <p>You must read the Standards of Conduct section to ensure all three types are covered. If all three are not specifically discussed, go to the definition section of the code to see how the terms used in the Standards of Conduct are defined. For cities, if “officials” is defined to include all non-elected officers as specified in KRS 83A.080, this covers appointed officials. Remember: DO NOT refer to the title of the code when considering whom the standards of conduct apply to.</p> <p>Auditor’s Note: A “no” answer on 1.b. does not mean the county or city code is out of compliance with KRS 65.003. It simply gives us an indication of areas of the statute that may need more clarity and specificity.</p> <p>In addition, some codes we reviewed used the term “officials” related to this section. Although elected and appointed officials and employees could be included in this definition, we chose not to use the term in this manner. Rather, we looked specifically for the wording contained in the statute. This does not mean however that the intent of the city or county by using the term does not include all officials.</p>		
<p>2. Does the code contain a FINANCIAL DISCLOSURE section as specified in KRS 65.003 (3)(b)?</p> <p>If a general section on financial disclosure is present, answer YES. The section may not be marked as such. If there is no section specifically marked as financial disclosure, look for provisions related to filing of statements or the wording “disclosure of financial interests.”</p>	YES	NO
<i>Statutory Provisions That Could Be More Specific And Clear</i>		
<p>a. Are financial disclosure statements filed annually?</p> <p>KRS 65.003(3)(b) specifically states that each code shall include, “requirements for creation of financial disclosure statements, which shall be filed annually…” For purposes of this testing, look to see if the code specifies that financial disclosure statements should be filed annually, or on a specific date.</p> <p>Auditor’s Note: A “no” answer on 2.a. does not mean the county or city code is out of compliance with KRS 65.003. It simply gives us an indication of areas of the statute that may need more clarity and specificity.</p>	YES	NO
<p>b. Are CANDIDATES required to file financial disclosure statements?</p> <p>KRS 65.003 was amended in 1996 to include candidates in the scope of those who are required to file annual financial disclosure statements. Check to see if the code includes this requirement.</p>	YES	NO
<p>c. Are ELECTED OFFICIALS required to file financial disclosure statements?</p> <p>KRS 65.003(3)(b) requires elected officials to file annual financial disclosure statements. Check to see if the code includes this requirement.</p>	YES	NO
<i>Statutory Provisions That Could Be More Specific And Clear</i>		
<p>d. Does the financial disclosure section explicitly state that statements are available for public inspection as specified in KRS 65.003 (3)(d)?</p> <p>Statute specifically states that financial disclosures shall be available for public inspection. For purposes of testing, check to see if the code explicitly states this requirement. If you do not see anything related to “open records” or “available for public inspection” in the financial disclosure section, you should also check in the enforcement section for a sentence saying something about the maintenance of financial disclosure statements. A reference to these statements being open</p>	YES	NO

<p>records may exist there.</p> <p>Auditor’s Note: A “no” answer on 2.d. does not mean the county or city code is out of compliance with KRS 65.003. It simply gives us an indication of areas of the statute that may need more clarity and specificity.</p>	
<p>e. Are financial disclosure statements filed with person or group responsible for enforcement of code?</p> <p>KRS 65.003(3)(b) requires that financial disclosure statements should be filed with the person or group responsible for enforcement of the code of ethics. KRS 65.003(3)(d) also requires “the designation of a person or group who shall be responsible for enforcement of the code of ethics, including maintenance of financial disclosure statements...” For purposes of this testing, check to see if the code addresses who financial disclosures should be filed with. Do not confuse the group or person to whom financial disclosure forms are filed with the group or person providing the forms. For example, the city clerk may provide the financial disclosure forms that are filed with the ethics board.</p> <p>Auditor’s Note: Kentucky League of Cities Handbook page 53 addresses this as follows: “House Bill 238 (KRS 65.003) requires the annual financial disclosure statements to be filed ‘with the person or group responsible for enforcement of the code of ethics’.” This should not, however, prevent the statements from being filed with and maintained by the city clerk, so long as the enforcement agent has full access to and ultimate control over the statements. The enforcement agent should be designated the ‘official custodian’ of the records for Kentucky Open Records Act purposes.”</p> <p>Auditor’s Note: A “no” answer on 2.d. does not mean the county or city code is out of compliance with KRS 65.003. It simply gives us an indication of areas of the statute that may need more clarity and specificity.</p>	<p>YES NO</p> <p>If NO, financial disclosure statements are filed with:</p> <hr/>
<p>3. Does the code contain a NEPOTISM section as specified in KRS 65.003 (3)(c)?</p> <p>KRS 65.003 (3)(c) requires “a policy on the employment of members of the families of officials or employees of the city or county government...” For purposes of this testing, The section may not be marked as such. If there is no section specifically marked as nepotism, look for provisions related to hiring of family members.</p>	<p>YES NO</p>
<p>4. Does the code contain an ENFORCEMENT section as specified in KRS 65.003 (3)(d)?</p> <p>If a general section on enforcement is present, answer YES. The section may not be marked as such. If there is no section specifically marked as enforcement, look for provisions related to enforcement body or ethics board/commission. Note that enforcement can be one person or a group.</p>	<p>YES NO</p>
<p>KRS 65.003(3)(d) outlines duties of the enforcement body. For purposes of this testing, check code to see if specific duties are included in the enforcement section of the code. Test for the exact wording used in the statute.</p> <p>Auditor’s Note: The Kentucky League of Cities Handbook (page 35) states, “the duties of the person or group who is responsible for enforcement of the code must include the various duties set forth in Section 3(d) of the Act.” In addition, DLG’s administrative protocol states on page 5(2)(e), “the ordinance must designate a group or individual who is responsible for enforcement of the code of ethics. This group/individual must also be delegated the following responsibilities: (i)... maintenance of financial disclosure statements...(ii)... receipt of complaints...(iii)...issuance of opinions...(iv) investigations of possible violations...(v) imposition of penalties...”</p>	

<i>Statutory Provisions That Could Be More Specific And Clear</i>			
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> a. Does the enforcement body maintain financial disclosure statements? <p>Read code closely for any references to financial disclosure statements where phrases such as “statements” or “required statements” are referred to in the enforcement section or the financial disclosure section. As long as the enforcement body maintains overall responsibility for the statements, answer YES to this question. See 2e Auditor’s Note.</p>	YES	NO	
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> b. Does 4a above conflict with answer to 2e? (Are maintenance and filing function given to different persons or groups) <p>For purposes of testing, we are documenting instances where a different entity maintains financial disclosure statements than the entity statements are filed with.</p>	YES	NO	
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> c. Does the enforcement body have authority to receive complaints? 	YES	NO	
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> d. Does the enforcement body have authority to issue opinions? 	YES	NO	
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> e. Does the enforcement body have authority to investigate possible violations? 	YES	NO	
<ul style="list-style-type: none"> • APA <ul style="list-style-type: none"> f. Does the enforcement body have authority to impose penalties? 	YES	NO	
<p>5. Does the code contain an enactment clause as specified in KRS 83A.060 (2) for cities and KRS 67.076 (4) for counties? (i.e. “Be it ordained...”) </p> <p>Above referenced statutes require enactment clauses. Check to see if code includes this requirement.</p>	YES	NO	
<p>6. Does the code contain a title as specified in KRS 83A.060 (1) for cities and KRS 67.076 (3) for counties? Note: county titles must say, “An ordinance relating to...”</p> <p>Above referenced statutes require titles. Check to see if code includes this requirement.</p>	YES	NO	
<p>7. Does DLG have proof of publication of the code on file as specified in KRS 65.003 (5)(a)?</p> <p>From previous file review conducted at DLG in mid 1999.</p>	YES	NO	
<p>8. If there are any amendments, does DLG have proof of publication of amendments to the code on file as specified in KRS 65.003 (5)(b)?</p> <p>From previous file review conducted at DLG in mid 1999.</p>	YES	NO	

Source: Applicable statutes as noted, OAG Opinions, Kentucky League of Cities Local Government Handbook, and auditor’s judgement.

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Adair	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Allen	✓			E, App	✓	✓	✓	✓	✓	✓		✓	
Anderson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Ballard	✓	✓		App	✓	✓	✓	✓		✓		✓	
Barren	✓	✓		App	✓	✓	✓	✓		✓		✓	
Bath	✓	✓		App	✓	✓	✓	✓		✓		✓	
Bell	✓	✓		App	✓	✓	✓	✓		✓		✓	
Boone	✓	✓	✓		✓	✓		✓		✓		✓	
Bourbon	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Boyd	✓	✓		Emp	✓	✓	✓	✓		✓		✓	
Boyle	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
Bracken	✓	✓	✓		✓	✓	✓	✓			County Clerk	✓	
Breathitt	✓	✓		App	✓	✓	✓	✓		✓		✓	
Breckinridge	✓	✓		App	✓	✓	✓	✓		✓		✓	
Bullitt	✓	✓	✓		✓	✓	✓	✓	✓		County Clerk	✓	
Butler	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Caldwell	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Calloway	✓	✓		App	✓		✓	✓			County Clerk	✓	
Campbell	✓	✓		App	✓	✓	✓	✓		✓		✓	
Carlisle	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Carroll	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Carter	✓	✓		App	✓	✓		✓			County Clerk	✓	
Casey	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Clark	✓	✓		App	✓		✓	✓		✓		✓	
Clay	✓	✓		App	✓					NF		✓	
Christian	✓	✓		App	✓	✓	✓	✓		✓		✓	
Clinton	✓	✓		App, Emp	✓	✓	✓	✓	✓		County Clerk	✓	
Crittenden	✓	✓		App	✓	✓	✓	✓	✓		County Court Clerk	✓	
Cumberland	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Daviess	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Edmonson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓		✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	NC		✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Elliott	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
Estill	✓	✓		App	✓	✓	✓	✓		✓		✓	
Fayette-Lexington Urban County Gov't	✓	✓	✓		✓	✓	✓	✓	✓		Council Clerk	✓	
Fleming	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Floyd	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Franklin	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Fulton	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Gallatin	✓	✓		App	✓	✓	✓	✓		✓		✓	
Garrard	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Grant	✓	✓		App	✓	✓	✓	✓		✓		✓	
Graves	✓	✓		App	✓	✓	✓	✓		✓		✓	
Grayson	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Green	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Greenup	✓	✓	✓		✓		✓	✓	✓	NS		✓	
Hancock	✓	✓		App, Emp	✓	✓		✓	✓		County Treasurer	✓	
Hardin	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Harlan	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Harrison	✓	✓		App	✓	✓	✓	✓		✓		✓	
Hart	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Henderson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Henry	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Hickman	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
Hopkins	✓	✓		App	✓	✓	✓	✓		✓		✓	
Jackson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Jefferson	✓	✓		Emp	✓	✓		✓		✓		✓	
Jessamine	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Johnson	✓	✓		App	✓		✓	✓	✓	✓		✓	
Kenton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Knott	✓	✓		App	✓	✓	✓	✓		✓		✓	
Knox	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Larue	✓	✓		App	✓	✓	✓	✓		✓		✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Laurel	✓	✓		App	✓	✓	✓	✓		NS		✓	
Lawrence	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Lee	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Leslie	✓	✓		App	✓	✓	✓	✓		✓		✓	
Letcher	✓	✓	✓		✓	✓	✓	✓	✓		County Clerk	✓	
Lewis	✓	✓		App	✓	✓	✓	✓		✓		✓	
Lincoln	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Livingston	✓	✓		App	✓	✓	✓	✓		✓		✓	
Logan	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Lyon	✓	✓		App	✓		✓	✓			County Court Clerk	✓	
Madison	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Magoffin	✓	✓		App	✓	✓		✓	✓	✓		✓	
Marion	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Marshall	✓	✓		App	✓	✓	✓	✓			County Court Clerk	✓	
Martin	✓	✓		App	✓	✓	✓	✓	✓		County Court Clerk	✓	
Mason	✓	✓		App	✓	✓	✓	✓	✓		Circuit Clerk	✓	
McCracken	✓	✓		App	✓	✓	✓	✓		✓		✓	
McCreary	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
McLean	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Meade	✓	✓		App	✓	✓	✓	✓		✓		✓	
Menifee	✓	✓		App	✓	✓	✓	✓		✓		✓	
Mercer	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Metcalfe	✓	✓		App	✓	✓	✓	✓		✓		✓	
Monroe	✓			E, App	✓	✓	✓	✓	✓	✓		✓	
Montgomery	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Morgan	✓	✓		App	✓	✓	✓	✓		✓		✓	
Muhlenberg	✓	✓		App	✓	✓	✓	✓		✓		✓	
Nelson	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Nicholas	✓	✓		App	✓	✓	✓	✓		✓		✓	
Ohio	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Oldham	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Owen	✓	✓		App	✓	✓	✓	✓	✓		County Clerk	✓	
Owsley	✓	✓		App, Emp	✓			✓		NC		✓	
Pendleton	✓	✓		App	✓	✓	✓	✓		✓		✓	
Perry	✓	✓		App	✓	✓	✓	✓		✓		✓	
Pike	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Powell	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Pulaski	✓	✓		App	✓	✓	✓	✓	✓		Co. Judge/Exec	✓	
Robertson	✓	✓		App, Emp	✓	✓	✓	✓		✓		✓	
Rockcastle	✓	✓		App	✓	✓	✓	✓		✓		✓	
Rowan	✓	✓		App	✓	✓	✓	✓		✓		✓	
Russell	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Scott	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Shelby	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Simpson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Spencer	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Taylor	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Todd	✓	✓		App	✓	✓	✓	✓		NS		✓	
Trigg	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
Trimble	✓	✓		App	✓	✓	✓	✓		✓		✓	
Union	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Warren	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Washington	✓	✓	✓		✓	✓	✓	✓	✓		Circuit Clerk	✓	
Wayne	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Webster	✓	✓		App	✓	✓	✓	✓		✓		✓	
Whitley	✓	✓		App, Emp	✓	✓	✓	✓		✓		✓	
Wolfe	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Woodford	✓	✓	✓		✓	✓	✓	✓	✓		County Clerk	✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓		✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓		✓		✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓					✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓		✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X
✓	✓	✓	✓	✓	✓	✓		✓	✓	
✓	NSA	N/A	✓	✓			✓	✓	✓	
✓	NC	N/A	✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
N=120													
Number answering "YES"	120	118	24	Number Blanks	120	113	108	119	63	78	Number Blanks	120	
Number answering "NO"	0	2	96	24	0	7	12	1	57	34	86	0	
Total of YES and NO	120	120	120	Number Non blanks	120	120	120	120	120	112		120	
Number of "NC"				96									
Number of "DLG"													
Number of "NF"										1			
Number of "NS"										6			
Number of "N/A"										0			
Number of "NSA"										0			
Total				Total						120			
Percentage answering "NO" (out of 120)	0%	2%	80%	120	0%	6%	10%	1%	48%	28%		0%	
											Circuit Clerk	2	
											Co. Judge/Exec	1	
											Council Clerk	1	
											County Court Clerk	4	
											County Clerk	25	
											County Treasurer	1	
												<u>34</u>	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
120	106	30	112	107	87	112	109	119	119	Number without Proof
0	0	82	8	13	33	8	11	1	1	2
120	106	112	120	120	120	120	120	120	120	
	2	0								
	0									
	0									
	0	8								
	12									
	120	120								
0%	0%	68%	7%	11%	28%	7%	9%	1%	1%	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Adairville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Albany	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Alexandria	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Allen	✓	✓		App	✓		✓	✓			City Clerk	✓	
Anchorage	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
Annville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Arlington	✓			E, App, Emp	✓	✓	✓	✓	✓		County Clerk	✓	
Ashland	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Auburn	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Audubon Park	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Augusta	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Bancroft	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Barbourmeade	✓	✓		Emp	✓	✓	✓	✓	✓	✓		✓	
Barbourville	✓			E, App	✓	✓			✓	✓		✓	
Bardstown	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Bardwell	✓	✓	✓		✓		✓	✓		✓		✓	
Barlow	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Beattyville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Beaver Dam	✓	✓		App	✓		✓	✓			City Clerk	✓	
Bedford	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Beechwood Village	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Bellefonte	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Bellemeade	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Bellevue	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Bellewood	✓	✓		App	✓	✓	✓	✓		✓		✓	
Benham	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Benton	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Berea	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Berry	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Blackey	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Blaine	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3.	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Bloomfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Blue Ridge Manor	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Bonnieville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Booneville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Bowling Green	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Bradfordsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Brandenburg	✓	✓		App	✓	✓	✓	✓		✓		✓	
Bremen	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Brianwood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Broad Fields	✓			E, App	✓	✓		✓	✓	✓		✓	
Brodhead	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Broeck Pointe	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Bromley	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Brooksville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Brownsboro Farm	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Brownsboro Village	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
Brownsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Burgin	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Burkesville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Burnside	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Butler	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Cadiz	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Calhoun	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
California	✓	✓		App	✓	✓		✓		NC		✓	
Calvert City	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Camargo	✓	✓		App	✓	✓	✓	✓	✓		Custodian	✓	
Cambridge	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Campbellsburg	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Campbellsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Campton	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Caneyville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND ✓ = "YES" blank = "NO" shaded row = "missing pages/summary" E = "Elected Officials" App = "Appointed Officials" Emp = "Employees" NC = "Not Clear" DLG = "DLG is missing page(s)" X = "No Proof of Publication" NF = "Disclosures Not Filed" NSA = "Not Specifically Addressed" NS = "Not Specified" N/A = "Not Applicable"	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
Carlisle	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Carrollton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Carrsville	✓	✓		App	✓			✓		NS		✓	
Catlettsburg	✓	✓		App	✓	✓		✓	✓	✓		✓	
Cave City	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Centertown	✓			E, App	✓	✓		✓	✓	✓		✓	
Central City	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Cherrywood Village	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Clarkson	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Clay City	✓	✓		App	✓	✓	✓	✓	✓		City Clerk	✓	
Clay	✓	✓	✓		✓	✓		✓			City Clerk	✓	
Clinton	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Cloverport	✓	✓		App	✓	✓	✓	✓		✓		✓	
Coal Run Village	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Cold Spring	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Coldstream	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Columbia	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Columbus	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Concord	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Corbin	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Corinth	✓	✓		App	✓	✓	✓	✓		NS		✓	
Corydon	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Covington	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Crab Orchard	✓	✓		App	✓	✓	✓	✓	✓		City Clerk	✓	
Creekside	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Crescent Park	✓	✓		App	✓			✓		✓		✓	
Crescent Springs	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Crestview	✓	✓		App	✓			✓		NF		✓	
Crestview Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Crestwood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Crittenden	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓						✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	NC	✓	✓	✓	✓	✓	✓	✓	
✓	✓						✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓			✓	✓	✓	✓	X
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓						✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓		✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓		✓	✓	✓	✓	✓	
✓	✓		✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3.	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Crofton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Crossgate	✓	✓		App	✓	✓	✓	✓		✓		✓	
Cumberland	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Cynthiana	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Danville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Dawson Springs	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Dayton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Dixon	✓	✓		App	✓	✓	✓	✓		NF		✓	
Douglass Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Dover	✓	✓		App	✓	✓		✓		✓		✓	
Drakesboro	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Druid Hills	✓	✓		Emp	✓	✓		✓	✓	✓		✓	
Dry Ridge	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Earlington	✓	✓	✓		✓	✓	✓	✓	✓		County Clerk	✓	
Eddyville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Edgewood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Edmonton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Ekron	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Elizabethtown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Elkhorn City	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Elkton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Elsmere	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Eminence	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Erlanger	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Eubank	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Evarts	✓	✓		App	✓	✓		✓		✓		✓	
Ewing	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fairfield	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Fairmeade	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Fairview	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Falmouth	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Ferguson	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fincastle	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Flatwoods	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fleming-Neon	✓	✓	✓		✓	✓		✓	✓		City Clerk	✓	
Flemingsburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Florence	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fordsville	✓	✓		App	✓		✓	✓		✓		✓	
Forest Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fort Mitchell	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Fort Thomas	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Fort Wright	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fountain Run	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Fox Chase	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Frankfort	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Franklin	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Fredonia	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Frenchburg	✓	✓		App	✓	✓	✓	✓		✓		✓	
Fulton	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Gamaliel	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Georgetown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Germantown	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Ghent	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Glasgow	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Glencoe	✓	✓		App	✓	✓	✓	✓		✓		✓	
Glenview	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Glenview Hills	✓	✓		App	✓	✓	✓	✓		✓		✓	
Glenview Manor	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Goose Creek	✓	✓		App	✓	✓	✓	✓		✓		✓	
Goshen	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Grand River	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Gratz	✓	✓	✓		✓	✓		✓	✓	✓		✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	Clerk		✓	✓	✓	✓	✓	✓	✓	
✓	✓						✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

CHECKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
= "YES"													
ank = "NO"													
aded row = "missing pages/summary"													
= "Elected Officials"													
ip = "Appointed Officials"													
np = "Employees"													
> = "Not Clear"													
.G = "DLG is missing page(s)"													
= "No Proof of Publication"													
= "Disclosures Not Filed"													
SA = "Not Specifically Addressed"													
S = "Not Specified"													
A = "Not Applicable"													
aymoor/Devondale	✓	✓	✓		✓	✓		✓	✓	✓		✓	
ayson	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
een Spring	✓	✓		App, Emp	✓	✓		✓	✓	✓		✓	
eensburg	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
eenup	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
eenville	✓	✓		App	✓	✓	✓	✓		✓		✓	
ethrie	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
inson	✓	✓	✓		✓	✓	✓	✓			County Clerk	✓	
irdin	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
irdinsburg	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
irian	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
irrodsburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
irtford	✓	✓	✓		✓	✓		✓	✓		City Clerk	✓	
ivesville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
izard	✓	✓		Emp	✓	✓	✓	✓	✓	✓		✓	
izel	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lron Estates	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
nderson	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
ckman	✓			E, App	✓		✓	✓		NS		✓	
ckory Hill	✓	✓		App, Emp	✓	✓		✓	✓	✓		✓	
ghland Heights	✓	✓		App	✓	✓	✓	✓		✓		✓	
Is And Dales	✓	✓	✓		✓	✓		✓	✓	✓		✓	
lview	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
ndman	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
seville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
dgenville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
llow Creek	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
llyvilla	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
pkinsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
rse Cave	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
uston Acres	✓	✓	✓		✓	✓		✓	✓	✓		✓	

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓		✓	✓	X
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A		✓	✓		✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND ✓ = "YES" blank = "NO" shaded row = "missing pages/summary" E = "Elected Officials" App = "Appointed Officials" Emp = "Employees" NC = "Not Clear" DLG = "DLG is missing page(s)" X = "No Proof of Publication" NF = "Disclosures Not Filed" NSA = "Not Specifically Addressed" NS = "Not Specified" N/A = "Not Applicable"	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3.	3a. (Not Used)
Hunters Hollow	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Hurstbourne Acres	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Hurstbourne	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Hustonville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Hyden	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Independence	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Indian Hills	✓	✓		App	✓	✓		✓		✓		✓	
Indian Hills-Cherokee	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Inez	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Irvine	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Irvington	✓	✓		App	✓	✓	✓	✓		✓		✓	
Island	✓	✓	✓		✓	✓	✓	✓	✓		County Court Clerk	✓	
Jackson	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Jamestown	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Jeffersontown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Jeffersonville	✓	✓		App	✓	✓	✓	✓	✓		Custodian	✓	
Jenkins	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Junction City	✓	✓		App	✓	✓		✓	✓	✓		✓	
Keeneland	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Kenton Vale	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Kevil	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Kingsley	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Kuttawa	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
La Center	✓	✓		App	✓	✓	✓	✓		✓		✓	
Lafayette	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
LaGrange	✓	✓		App	✓	✓		✓	✓	✓		✓	
Lakeside Park	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Lakeview Heights	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Lancaster	✓	✓		App	✓	✓	✓	✓	✓		City Clerk	✓	
Langdon Place	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Latonia Lakes	✓	✓	✓		✓	✓		✓	✓	✓		✓	

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
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✓	✓		✓	✓	✓	✓	✓	✓	✓	
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✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND ✓ = "YES" blank = "NO" shaded row = "missing pages/summary" E = "Elected Officials" App = "Appointed Officials" Emp = "Employees" NC = "Not Clear" DLG = "DLG is missing page(s)" X = "No Proof of Publication" NF = "Disclosures Not Filed" NSA = "Not Specifically Addressed" NS = "Not Specified" N/A = "Not Applicable"	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
Lawrenceburg	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Lebanon Junction	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
Lebanon	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Leitchfield	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Lewisburg	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Lewisport	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Liberty	✓	✓	✓		✓	✓		✓		✓		✓	
Lincolnshire	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Livermore	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Livingston	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
London	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Lone Oak	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Loretto	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Louisa	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Louisville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Loyall	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Ludlow	✓	✓		App	✓	✓		✓	✓	✓		✓	
Lynch	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Lyndon	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Lynnview	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Mackville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Madisonville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Manchester	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Manor Creek	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Marion	✓	✓		App	✓	✓	✓	✓		✓		✓	
Martin	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Maryhill Estates	✓			E, App	✓	✓		✓	✓	✓		✓	
Mayfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Maysville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
McHenry	✓	✓	✓		✓	✓		✓	✓		Mayor	✓	
McKee	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	NC				✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Meadowbrook Farm	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Meadowvale	✓	✓		App	✓	✓		✓	✓	✓		✓	
Meadowview Estates	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Melbourne	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Mentor	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Middlesboro	✓			E, App	✓	✓	✓	✓	✓	✓		✓	
Middletown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Midway	✓	✓	✓		✓	✓	✓	✓	✓		County Clerk	✓	
Millersburg	✓	✓		App	✓	✓	✓	✓	✓	NS		✓	
Milton	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Minor Lane Heights	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Mockingbird Valley	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Monterey	✓	✓		App	✓	✓	✓	✓		✓		✓	
Monticello	✓	✓	✓		✓	✓	✓	✓	✓		City Treasurer	✓	
Moorland	✓	✓	✓		✓	✓		✓		✓		✓	
Morehead	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Morganfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Morgantown	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
Morton's Gap	✓	✓	✓		✓		✓	✓			County Clerk	✓	
Mount Olivet	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Mount Sterling	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Mount Vernon	✓			E, App	✓	✓	✓	✓	✓	✓		✓	
Mount Washington	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Muldraugh	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Munfordville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Murray Hill	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Murray	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Nebo	✓	✓	✓		✓	✓	✓	✓			County Clerk	✓	
New Castle	✓	✓	✓		✓	✓		✓	✓	✓		✓	
New Haven	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Newport	✓	✓	✓		✓	✓	✓	✓		✓		✓	

APA Checklist Test

TICKMARK LEGEND ✓ = "YES" blank = "NO" shaded row = "missing pages/summary" E = "Elected Officials" App = "Appointed Officials" Emp = "Employees" NC = "Not Clear" DLG = "DLG is missing page(s)" X = "No Proof of Publication" NF = "Disclosures Not Filed" NSA = "Not Specifically Addressed" NS = "Not Specified" N/A = "Not Applicable"	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
Nicholasville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Norbourne Estates	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
North Middletown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Northfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Nortonville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Norwood	✓	✓		App	✓	✓		✓	✓	✓		✓	
Oak Grove	✓	✓		App	✓	✓	✓	✓		✓		✓	
Oakland	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Old Brownsboro Place	✓	✓	✓		✓	✓		✓		✓		✓	
Olive Hill	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Orchard Grass Hills	✓	✓		App	✓	✓	✓	✓		✓		✓	
Owensboro	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Owenton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Owingsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Paducah	✓	✓		App	✓	✓	✓	✓		✓		✓	
Paintsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Paris	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
Park City	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Park Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Park Lake	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Parkway Village	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Pembroke	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Perryville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Pewee Valley	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Pikeville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Pineville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Pioneer Village	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Pippa Passes	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Plantation	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Pleasureville	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Plum Springs	✓	✓	✓		✓	✓		✓	✓	✓		✓	

APA Checklist Test

CKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
= "YES"													
ink = "NO"													
ided row = "missing pages/summary"													
= "Elected Officials"													
p = "Appointed Officials"													
tp = "Employees"													
: = "Not Clear"													
.G = "DLG is missing page(s)"													
= "No Proof of Publication"													
: = "Disclosures Not Filed"													
SA = "Not Specifically Addressed"													
: = "Not Specified"													
A = "Not Applicable"													
mouth Village	✓	✓	✓		✓	✓		✓		✓		✓	
plar Hills	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
wderly	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
estonsburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
estonville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
inceton	✓	✓	✓		✓	✓	✓	✓	✓		City Clerk	✓	
ospect	✓	✓	✓		✓	✓	✓	✓		✓		✓	
vidence	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
celand	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ycliff	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
venna	✓	✓	✓		✓	✓		✓	✓	✓		✓	
tywick	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
chlawn	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
chmond	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ver Bluff	✓	✓		App	✓	✓		✓	✓	✓		✓	
verwood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
binswood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
xchester	✓	✓	✓		✓	✓		✓	✓	✓		✓	
xkport	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lling Fields	✓	✓	✓		✓	✓		✓	✓	✓		✓	
lling Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ssell Springs	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ssell	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ssellville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
land Heights	✓	✓	✓		✓	✓		✓	✓	✓		✓	
ramento	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
dieville	✓	✓	✓		✓	✓	✓	✓		✓		✓	
int Charles	✓	✓	✓		✓	✓		✓		✓		✓	
int Matthews	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
int Regis Park	✓	✓	✓		✓	✓		✓	✓	✓		✓	
ilem	✓	✓		App	✓			✓		NS		✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3.	3a. (Not Used)
✓ = "YES"													
blank = "NO"													
shaded row = "missing pages/summary"													
E = "Elected Officials"													
App = "Appointed Officials"													
Emp = "Employees"													
NC = "Not Clear"													
DLG = "DLG is missing page(s)"													
X = "No Proof of Publication"													
NF = "Disclosures Not Filed"													
NSA = "Not Specifically Addressed"													
NS = "Not Specified"													
N/A = "Not Applicable"													
Salt Lick	✓	✓		App	✓	✓		✓		✓		✓	
Salversville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sanders	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sandy Hook	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sardis	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Science Hill	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Scottsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sebree	✓	✓		App, Emp	✓	✓		✓		✓		✓	
Seneca Gardens	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Sharpsburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Shelbyville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Shepherdsville	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Shively	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Silver Grove	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Simpsonville	✓	✓	✓		✓	✓		✓	✓	NS		✓	
Slaughters	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Smithfield	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Smithland	✓	✓		App	✓			✓		NF		✓	
Smiths Grove	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Somerset	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sonora	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
South Carrollton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
South Park View	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
South Shore	✓	✓		App	✓	✓	✓	✓			City Clerk	✓	
Southgate	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sparta	✓	✓		App	✓	✓	✓	✓		✓		✓	
Spring Mill	✓	✓		Emp	✓	✓		✓	✓	✓		✓	
Spring Valley	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Springfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Springlee	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Stamping Ground	✓	✓		App	✓	✓	✓	✓		✓		✓	

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓		✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	N/A	✓	✓	✓		✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		DLG	✓	DLG	✓	✓	✓	✓	
✓	✓		✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	

APA Checklist Test

TICKMARK LEGEND ✓ = "YES" blank = "NO" shaded row = "missing pages/summary" E = "Elected Officials" App = "Appointed Officials" Emp = "Employees" NC = "Not Clear" DLG = "DLG is missing page(s)" X = "No Proof of Publication" NF = "Disclosures Not Filed" NSA = "Not Specifically Addressed" NS = "Not Specified" N/A = "Not Applicable"	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
Stanford	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Stanton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Strathmoor Manor	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Strathmoor Village	✓			E, App	✓			✓			City secretary	✓	
Sturgis	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Sycamore	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Taylor Mill	✓	✓	✓		✓	✓		✓	✓	✓		✓	
Taylorville	✓	✓		App	✓	✓	✓	✓	✓	✓		✓	
Ten Broeck	✓	✓		App	✓		✓	✓		NF		✓	
Thornhill	✓			E, App	✓	✓	✓	✓	✓	✓		✓	
Tompkinsville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Trenton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Union	✓	✓	✓		✓	✓		✓	✓		City Clerk	✓	
Uniontown	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Upton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Vanceburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Versailles	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Vicco	✓	✓		App	✓	✓	✓	✓			County Clerk	✓	
Villa Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Vine Grove	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Wallins Creek	✓	✓		App	✓	✓	✓	✓		✓		✓	
Walton	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Warfield	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Warsaw	✓	✓		App	✓	✓	✓	✓		✓		✓	
Water Valley	✓			E, App	✓					NF	NF	✓	
Watterson Park	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Waverly	✓	✓	✓		✓	✓	✓	✓		✓		✓	
Wayland	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
Wellington	✓	✓		App	✓	✓		✓		✓		✓	
West Buechel	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
West Liberty	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	NC	✓		✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓	✓			✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓			✓	✓		✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	

APA Checklist Test

CKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE							NEPOTISM	
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3	3a. (Not Used)
est Point	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
estwood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
heatcroft	✓	✓		App	✓	✓	✓	✓		NC		✓	
heelwright	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
hipps Millgate	✓	✓		App	✓	✓		✓			City Clerk	✓	
hite Plains	✓	✓	✓		✓	✓	✓	✓			County Clerk	✓	
hitesburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
hitesville	✓	✓	✓		✓	✓		✓	✓		City Clerk	✓	
ckliffe	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lder	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ldwood	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lliamsburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lliamstown	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
llisburg	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
lmore	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
nchester	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
nding Falls	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
ndy Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
ngo	✓			E, App	✓					NF		✓	
oodburn	✓	✓	✓		✓	✓		✓	✓	✓		✓	
oodbury	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
oodland Hills	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
oodlawn	✓	✓	✓		✓	✓		✓	✓	✓		✓	
oodlawn Park	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
orthington Hills	✓	✓		App, Emp	✓	✓	✓	✓	✓	✓		✓	
orthington	✓	✓		App	✓	✓	✓				City Clerk	✓	
orthville	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
urtland	✓	✓	✓		✓	✓	✓	✓	✓	✓		✓	
boards	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	N/A	✓	✓		✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	NSA	N/A	✓			✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	X
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
✓	✓		✓	✓	✓	✓	✓	✓	✓	
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

APA Checklist Test

TICKMARK LEGEND	STANDARDS OF CONDUCT				FINANCIAL DISCLOSURE						NEPOTISM			
	1.	1a.	1b.	1b.	2.	2a.	2b.	2c.	2d.	2e.	2e.	3.	3a. (Not Used)	
✓ = "YES"														
blank = "NO"														
shaded row = "missing pages/summary"														
E = "Elected Officials"														
App = "Appointed Officials"														
Emp = "Employees"														
NC = "Not Clear"														
DLG = "DLG is missing page(s)"														
X = "No Proof of Publication"														
NF = "Disclosures Not Filed"														
NSA = "Not Specifically Addressed"														
NS = "Not Specified"														
N/A = "Not Applicable"														
N=432														
Number answering "YES"	428	416	309	Number Blanks	428	413	340	424	353	363	Number Blanks	428		
Number answering "NO"	0	12	119	309	0	15	88	4	75	49	378	0		
Total of YES and NO	428	428	428	Number NonBlanks	428	428	428	428	428	412		428		
Number of "N/A"	4	4	4	123	4	4	4	4	4	4		4		
Number of "DLG"										0				
Number of "NC"										2				
Number of "NF"										6				
Number of "NS"										8				
Number of "NSA"										0				
Clerk														
Total	432	432	432	Total	432	432	432	432	432	432		432		
Percentage answering "NO"	0%	3%	28%	432	0%	4%	21%	1%	18%	11%		0%		
Note: percentage is of codes on file (428)														
													City Clerk	34
													City Treasurer	1
													City Secretary	1
													County Clerk	9
													County Court Clerk	1
													Custodian	2
													Mayor	1
														49

APA Checklist Test

ENFORCEMENT							ENACTMENT CLAUSE	TITLE	PROOF PUB	PROOF PUB AMENDMENTS
4.	4a.	4b.	4c.	4d.	4e.	4f.	5.	6.	7.	8.
428	408	40	417	406	384	413	423	424	428	Number without proof
0	0	369	10	22	42	15	5	4	0	17
428	408	409	427	428	426	428	428	428	428	
4	4	20	4	4	4	4	4	4	4	
	0		1		2					
	0	3								
	0									
	0									
	19									
	1									
432	432	432	432	432	432	432	432	432	432	
0%	0%	86%	2%	5%	10%	4%	1%	1%	0%	

COUNTYWIDE AND REGIONAL AGREEMENTS

Appendix IV

COUNTYWIDE OR REGIONAL BOARD IN QUESTION	INTERLOCAL AGREEMENT APPROVED BY OAG	INTERLOCAL AGREEMENT ON FILE AT SECRETARY OF STATE	INTERLOCAL AGREEMENT ON FILE AT LOCAL COUNTY CLERKS
BRADD	MOA	MOA	MOA
BOYLE COUNTY	✓	X	✓
BRECKINRIDGE COUNTY	✓	✓	✓
CARROLL COUNTY	✓	✓	✓
CVADD	MOA	MOA	MOA
DAVISS COUNTY	✓	✓	✓
FLEMING COUNTY	✓	X	✓
GALLATIN COUNTY	X	X	X
HARDIN COUNTY	✓	X	✓
HENDERSON COUNTY	✓	✓	✓
MCLEAN COUNTY	✓	✓	✓
MERCER COUNTY	X	X	X
MONTGOMERY COUNTY	X	X	X
MUHLENBERG COUNTY	NB	NB	NB
NELSON COUNTY	✓	✓	✓
NKREA	✓	✓	R
WOODFORD COUNTY	✓	✓	✓
TOTALS	17	17	17
Number on File	11	8	10
Number NOT on File	3	6	3
Number MOA	2	2	2
Number R	0	0	1
Number NB	1	1	1
Total	17	17	17

Source: Surveys sent to Local Governments, Offices of Attorney General and Secretary of State, and local government county clerk offices.

TICKMARK LEGEND	
X	= Not on file
✓	= On File
MOA = Memorandum of Agreement	
R	= On file in respective county except for Park Hills and Williamstown
NB	= No Board Exists

The following table lists countywide and regional ethics boards with member entities. It includes boards that have interlocal agreements that are in compliance with KRS 65.210 through 65.300. It also includes two additional regional boards that have Memoranda of Agreements.

Board in Question	Member County/City	Board in Question	Member County/City
BRADD (MOA)		Carroll Co.	
1	Allen Co.	1	Carroll Co.
2	Butler Co	2	Carrollton
3	Edmonson Co.	3	Ghent
4	Hart Co.	4	Prestonville
5	Logan Co.	5	Sanders
6	Monroe Co.	6	Worthville
7	Simpson Co.		
8	Adairville	CVADD (MOA)	
9	Auburn	1	Bell Co.
10	Bonnieville	2	Jackson Co.
11	Brownsville	3	Whitley Co.
12	Cave City	4	Annville
13	Fountain Run	5	Barbourville
14	Franklin	6	Benham
15	Gamaliel	7	Broadhead
16	Hiseville	8	Cumberland
17	Lewisburg	9	Harlan
18	Morgantown	10	Livingston
19	Munfordville	11	Lynch
20	Oakland	12	McKee
21	Park City	13	Middlesboro
22	Plum Springs	14	Mount Vernon
23	Rochester	15	Pineville
24	Russellville		
25	Scottsville	Daviess Co.	
26	Smiths Grove	1	Daviess Co.
27	Woodburn	2	Owensboro
Boyle Co.		Fleming Co.	
1	Boyle Co.	1	Fleming Co.
2	Junction City	2	Ewing
3	*Perryville	3	Flemingsburg
Breckinridge Co.		Hardin Co.	
1	Breckinridge Co.	1	Hardin Co.
2	Cloverport	2	Elizabethtown
3	Irvington	3	Radcliff
		4	Vine Grove
		5	West Point

Interlocal in Question	Member County/City	Interlocal in Question	Member County/City
Henderson Co.		NKREA.	
1	Henderson Co.	1	Pendleton Co.
2	Corydon	2	Bellevue
3	Henderson	3	Erlanger
		4	Mentor **
		5	Park Hills
McLean Co.		6	Taylor Mill
1	McLean Co.	7	Walton
2	Calhoun	8	Williamstown
3	Island		
4	Livermore	Woodford Co.	
5	Sacramento	1	Woodford Co.
		2	Midway
Nelson Co.		3	Versailles
1	Nelson Co.		
2	Bardstown		
3	Fairfield		

Source: Surveys sent to Local Governments, Offices of Attorney General and Secretary of State, and local government county clerk offices.

* In testing, we determined that Perryville is not a part of the countywide board

**In testing, we determined that Mentor is no longer a city.

Contributors To This Report

Edward B. Hatchett, Jr., Auditor of Public Accounts
Gerald W. Hoppmann, Director of Performance Audit
Margaret Hurst, CPA, Performance Auditor
Kevin Devlin, JD, Performance Auditor
Cindy Kincaid, Performance Auditor
Scott Taulbee, Performance Auditor

Obtaining Audit Reports

Copies of this report or other previously issued reports can be obtained for a nominal fee by faxing the APA office at 502-564-2912. Alternatively, you may

Order by mail: Report Request
 Auditor of Public Accounts
 144 Capitol Annex
 Frankfort, Kentucky 40601

Visit : 8 AM to 4:30 PM weekdays

Email: Hatchett@kyauditor.net

Browse our web site: <http://www.kyauditor.net>

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The staff of the APA office performs a host of services for governmental entities across the state. Our primary concern is the protection of taxpayer funds and furtherance of good government by elected officials and their staffs. Our services include:

Performance Audits: The Division of Performance Audit conducts performance audits, performance measurement reviews, benchmarking studies, and risk assessments of government entities and programs at the state and local level in order to identify opportunities for increased efficiency and effectiveness.

Financial Audits: The Division of Financial Audit conducts financial statement and other financial-related engagements for both state and local government entities. Annually the division releases its opinion on the Commonwealth of Kentucky's financial statements and use of federal funds.

Investigations: Our fraud hotline, 1-800-KY-ALERT (592-5378), and referrals from various agencies and citizens produce numerous cases of suspected fraud and misuse of public funds. Staff conduct investigations in order to determine whether referral of a case to prosecutorial offices is warranted.

Training and Consultation: We annually conduct training sessions and offer consultation for government officials across the state. These events are designed to assist officials in the accounting and compliance aspects of their positions.

General Questions

General questions should be directed to Donna Dixon, Intergovernmental Liaison, at (502) 564-5841 or the address above.