1	[Elections for the Retiree	Health Trust Fund Board, San Francisco Employee Retirement
2	System Board and Health	Service System Board]
3		
4	Ordinance amending the	e San Francisco Administrative Code by amending sections
5	16.550-16.561 and 16.56	3-16.564, and adding Sections 16.553-1, 16.553-2 and 16.565,
6	and amending San Fran	cisco Campaign and Governmental Conduct Code by adding
7	section 3.1-268, to allow	for Retiree Health Trust Fund Board elections and making
8	minor revisions to exist	ing San Francisco Retirement System and Health Service
9	System election proced	ures.
10	Note:	Additions are <u>single-underline italics Times New Roman;</u>
11		deletions are strikethrough italics Times New Roman.  Board amendment additions are double underlined.
12		Board amendment deletions are strikethrough normal.
13	Be it ordained by the	ne People of the City and County of San Francisco:
14	Section 1. The Sa	n Francisco Administrative Code is hereby amended by amending
15	sections 16.550-16.561 a	nd 16.563-16.565, and adding sections 16.553-1, 16.553-2 and
16	16.565, to read as follows	
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18		N OF TRUSTEES FOR THE RETIREMENT BOARD, <i>AND</i> RD <u>AND RETIREE HEALTH TRUST FUND BOARD</u>
19	SEC. 16.550. PURPOSE	•
20	(a) The Charter	of the City and County of San Francisco provides that the trustees
21	of the Retirement Board,	who are entrusted with the administration of the San Francisco City
22	and County Employee's R	Retirement System, shall include three trustees elected from the
23	active and retired membe	rs of the Retirement System. As used in this Article, a retired
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1	member of the Retirement System shall mean a person who is in receipt of a retirement
2	allowance relating to his or her membership in the retirement system.

The Charter of the City and County of San Francisco provides that the trustees of the Health Service Board, who are entrusted with the administration of the San Francisco City and County Employees' Health Service System, shall include \*\*threefour\*\* trustees elected from the active and retired members of the Health Service System. \*\*As used in this ArticleFor the \*\*purposes of a Health Service System election\*\*, a retired member of the Health Service System shall mean a person who is a member of the Health Service System retired under the San Francisco City and County Employees' Retirement System, State Teachers Retirement System (STRS), Public Employees Retirement System (PERS), and the surviving spouse of an active employee and the surviving spouse of a retired employee, provided that the surviving spouse and the active or retired employee have been married for a period of at least one year prior to the death of the active or retired employee.

Retiree Health Care Trust Fund, who are entrusted with providing a funding source to defray the cost of the City's and Participating Employers' obligations to pay for health coverage for retired persons and their survivors entitled to health care coverage under Charter Section A8.428, shall include two trustees elected from active employees and retired members of the City's Health Service System. One of the elected trustees shall be an active City or Participating Employer employee member and one shall be a retired City or Participating Employer member as of the date of their respective elections. For the purposes of a Retiree Health Care Trust Fund election, a retired member of the Health Service System shall mean a person who retired from City employment or from a Participating Employer and who is a member of the Health Service System retired under the San Francisco City and County Employees'
Retirement System, the State Teachers Retirement System (STRS), or the Public Employees Retirement

1	System (PERS), and the surviving spouse or domestic partner of an active employee and the surviving
2	spouse or domestic partner of a retired employee, provided that the surviving spouse or domestic
3	partner and the active or retired employee have been married for a period of at least one year prior to
4	the death of the active or retired employee. For the purposes of a Retiree Health Care Trust Fund
5	election, an active member of the Health Service System shall mean an active City employee or an
6	active employee of a Participating Employer. As used in this section, Participating Employer shall
7	include the San Francisco Unified School District and the San Francisco Community College District,
8	following a resolution by these employers' respective governing boards to participate in the Retiree
9	Health Care Trust Fund.
10	(d) The failure to abide by election procedure obligations and deadlines in San Francisco
11	Administrative Code Sections 16.550-16.565 shall not invalidate an elections if the election has been
12	conducted fairly and in substantial compliance with and conformity to the legal requirements.
13	$\underline{(e)}$ Whenever the term of office of such an elected trustee expires or whenever a
14	vacancy occurs in such an office so that an election is necessary to fill a present or expected
15	vacancy, the following provisions shall govern the election procedure.
16	SEC. 16.551. RETIREMENT BOARD, OR HEALTH SERVICE BOARD OR RETIREE
17	<u>HEALTH TRUST FUND BOARD</u> TO ORDER ELECTIONS.
18	If a vacancy occurs, or will occur, in the office of an elected trustee prior to the date that
19	the term of that office expires, the Retirement Board, or Health Service Board or Retiree Health
20	<u>Trust Fund Board</u> shall order a special election to fill the vacancy for the unexpired portion of
21	the term of office, unless another election to a Retirement Board, $or$ Health Service Board $or$
22	Retiree Health Trust Fund Board office is scheduled to be completed within six months after the
23	vacancy has, or shall, occur, in which case the elections shall be combined; provided,
24	however, that a separate special election shall be required if the election which has already

- been scheduled will occur too soon to nominate and select candidates for the more recent
- 2 vacancy. Whenever the Retirement Board, or Health Service Board or Retiree Health Trust
- 3 Fund Board orders an election, the respective Board shall specify whether the election is to be
- 4 conducted by the *Registrar of Voters ("Registrar")* Department of Elections or by an unbiased
- 5 independent contractor ("Contractor"). <u>Special elections may be held on an expedited basis as</u>
- 6 determined by the Department of Elections. The first Retiree Health Trust Fund Board election shall
- 7 *be a special election conducted by the Department of Elections.*
- 8 SEC. 16.552. DATES OF ELECTION.
- 9 Whenever an election is necessary, either at the completion of a term of office or to fill an
- unexpired term of office, the Retirement Board, or Health Service Board or Retiree Health Trust
- 11 *Fund Board* shall specify the dates during which ballots may be marked and delivered.
- However, the dates designated by the Retirement Board, *or*-Health Service Board *or Retiree*
- 13 Health Trust Fund Board shall not be within one month before or after an election which has
- been otherwise scheduled and which involves residents of the City and County of San
- 15 Francisco as electors, *unless the Department of Elections agrees to do so*.
- 16 SEC. 16.553. NOTICE TO MEMBERS AND RETIRED MEMBERS; NOMINATION OF
- 17 MEMBERS AND RETIRED MEMBERS.
- The Retirement Board, *or* Health Service Board *or Retiree Health Trust Fund Board* shall
- 19 thereafter notify the members and retired members of the Retirement System or Health
- 20 Service System respectively of the following:
- 21 (a) The necessity for an election;
- (b) The procedure for nomination and selection of candidates to serve on the Board; and
- 23 (c) The dates that ballots may be marked and delivered and the procedure for voting.

1	The period of time during which nominations may be made shall be set by the Retirement
2	Board, or Health Service Board or Retiree Health Trust Fund Board, but in no event shall be less
3	than 31 days. Any person nominated to serve as a trustee of the Retirement Board, or Health
4	Service Board or Retiree Health Trust Fund Board shall, on forms provided by the respective
5	Board for this purpose and by the date set by the respective Board, verify acceptance of the
6	nomination and agree to serve if elected before he or she may be listed as a candidate.
7	In any election for membership on the Health Service Board or Retiree Health Trust Fund Board,
8	when only one candidate has filed nomination papers, the Registrar of Voters Department of
9	$\underline{\it Elections}$ or Contractor shall not conduct an election and shall declare the sole candidate to be
10	a member of the Health Service Board or Retiree Health Trust Fund Board.
11	SEC. 16.553-1. CANDIDATE QUALIFICATION STATEMENTS.
12	(a) Content and Form of Statement. Candidates may file a candidate qualification statement including
13	the name, age and occupation of the candidate and a description of no more than 200 words of the
14	candidate's education and qualifications as expressed by the candidate. To ensure that all statements
15	are filed in a uniform format, the statement shall be in a manner specified, and on a form provided, by
16	the Department of Elections for this purpose.
17	(b) Deadline for Submission of Statement. Candidates who choose to submit a candidate qualification
18	statement shall file the statement with the Department of Elections at the date and time established by
19	that department.
20	(c) Inclusion of Nominators and Supporters. The candidate qualification statement may, but need not,
21	include the names of some or all of the candidate's nominators. The statement may also include the
22	names of individuals and entities which support the candidate but which did not serve as nominators.

However, the names of such supporters shall not be published as part of the candidate's qualification

statement unless the candidate provides the supporter's written authorization at the time the statement

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1	is submitted to the Director of Elections. The authorization shall be in a form prescribed by the
2	Director of Elections. If the candidate chooses to include the names of nominators or other supporters
3	in the candidate qualification statement, these names shall be counted toward the 200-word limit.
4	(d) Limitations. The candidate qualification statement shall not include the party affiliation of the
5	candidate, nor membership or activity in partisan political organizations.
6	(e) Withdrawal of Statement. A candidate may withdraw, but not change, his or her candidate
7	qualification statement by filing with the Director of Elections a signed and sworn statement of
8	withdrawal no later than 5:00 p.m. of the thirtieth day prior to the election.
9	SEC. 16.553-2. CANDIDATE DISCLOSURE REQUIREMENTS.
10	(a) Each candidate for Retirement Board, Health Service Board or Retiree Health Trust Fund
11	Board elections shall file, by the date set by the respective Board for verifying acceptance of the
12	nomination, a statement disclosing the information required by the disclosure category for the elective
13	office sought by the candidate established in the Conflict of Interest Code. Candidates shall file such
14	statements with the respective Board on the same forms as used by filers under Section 3.1-100, et seq
15	of the Conflict of Interest Code. This statement shall not be required if the candidate has filed, within
16	90 days prior to accepting the nomination, a statement at disclosure category one (1) with the City and
17	County of San Francisco.
18	SEC. 16.554. NOTICE TO REGISTRAR DEPARTMENT OF ELECTIONS OR
19	CONTRACTOR.
20	The Retirement Board, or Health Service Board or Retiree Health Trust Fund Board shall notify
21	the Registrar Department of Elections or Contractor at least 120 days prior to the first day that
22	ballots may be marked and delivered (hereafter referred to as the $f''F$ irst $f''V$ oting $f''V$ that
23	an election shall be held.
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1	SEC. 16.555. NOTICE TO DEPARTMENTS; APPOINTMENT OF ELECTION OFFICERS.
2	The Registrar Department of Elections or Contractor shall notify each department, office and
3	agency of the City and County of San Francisco (hereunder referred to as "department") at
4	least 90 days prior to the $\underline{\mathit{fF}}$ irst $\underline{\mathit{vV}}$ oting $\underline{\mathit{dD}}$ ay that the department must designate an employee
5	who shall serve as Election Officer for that department and must inform the Registrar
6	<u>Department of Elections</u> or Contractor at least 60 days prior to the $f\underline{F}$ irst $\psi \underline{V}$ oting $d\underline{D}$ ay of the
7	identity of such officer. The Registrar Department of Elections or Contractor shall supply each
8	department with a form which can be returned to the Registrar Department of Elections or
9	Contractor which identifies the employee who has been designated Election Officer. If any
10	department has not designated an Election Officer by the appointed deadline, the Registrar
11	<u>Department of Elections</u> or Contractor shall <u>treat the department head as the Election Officernotify</u>
12	the department that the deadline has passed and shall continue to provide such notice until such
13	designation has been made.
14	SEC. 16.556. INSTRUCTIONS TO ELECTION OFFICERS.
15	The Registrar Department of Elections or Contractor shall provide written instructions to each
16	Election Officer at least 21 days prior to the $f\underline{F}$ irst $\underline{v}\underline{V}$ oting $d\underline{D}$ ay, informing such officer of dates
17	on which ballots will be distributed and collected and the procedure to be followed for their
18	distribution and collection. If any department has failed to designate an Election Officer by the
19	time that the Registrar Department of Elections or Contractor sends these written instructions,
20	the Registrar Department of Elections or Contractor shall thereafter treat the administrative head
21	of the department as the Election Officer until another employee has been designated as such
22	by that department.
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- 1 SEC. 16.557. DELIVERY OF BALLOTS AND NAMES OF ELIGIBLE VOTERS TO
- 2 REGISTRAR DEPARTMENT OF ELECTIONS OR CONTRACTOR.
- 3 The Retirement Board, or Health Service Board or Retiree Health Trust Fund Board shall furnish
- 4 the *Registrar Department of Elections* or Contractor with the names of the eligible nominees at
- least 35 days prior to the  $f\underline{F}$  irst  $\psi \underline{V}$  oting  $d\underline{D}$  ay.
- 6 The Retirement Board, or Health Service Board or Retiree Health Trust Fund Board shall also
- 7 furnish the *Registrar Department of Elections* or Contractor with a list of the members and retired
- 8 members of the Retirement System or Health Service System respectively eligible to vote
- 9 ("voters") in the election at the same time that it furnishes the names of the eligible nominees.
- 10 A supplemental list shall be furnished to the *Registrar Department of Elections* or Contractor
- within two days of the fFirst + Voting d Day, which list shall provide the names of eligible
- voters not included on the original list. These lists shall be in the format required by the
- 13 Registrar Department of Elections or Contractor. These lists shall include the last known
- addresses for the members and retired members. For the active members, at the election of
- the entity conducting the election the department address shall be provided as an alternative.
- 16 SEC. 16.558. BALLOTS TO CONTAIN INSTRUCTIONS FOR VOTING.
- 17 Each ballot shall contain instructions printed on it informing the voters of the procedure to be
- used in marking the ballot. Each ballot, or ballot return envelope, shall inform the voter that
- there are three ways to return the ballot:
- 20 (a) By placing the ballot in the container maintained for such purpose by the Election Officer
- of the voter's department, or by otherwise using the collection procedure arranged for by the
- 22 Election Officer;
- 23 (b) By delivering the signed and sealed envelope with the ballot enclosed personally to the office
- 24 of the Registrar Department of Elections or the Contractor; and

- 1 (c) By placing a stamp on the ballot return envelope and mailing the ballot and envelope to
- 2 the *Office of the Registrar Department of Elections* or *the* Contractor.
- 3 The instructions shall also note the date by which ballots are to be delivered as noted above
- 4 in order to be counted.
- 5 SEC. 16.559. BALLOTS TO BE PLACED IN ADDRESSED ENVELOPES; EXTRA
- 6 BALLOTS.
- 7 (a) Members. Each ballot and ballot return envelope shall be mailed in a separate envelope
- 8 addressed to each employee eligible to vote at the member's individual address provided by
- 9 the Retirement System, *or*-Health Service System *or Retiree Health Trust Fund Board*. In the
- alternative, at the election of the entity conducting the election, ballots shall be delivered in
- 11 care of his or her department.
- 12 (b) Retired Members. Each ballot and ballot return envelope shall be mailed in a separate
- 13 envelope addressed to the retired member at the address provided by the Retirement System,
- 14 *or* Health Service System *or Retiree Health Trust Fund Board*.
- 15 (c) Additional ballots shall be printed and available for members and retired members of the
- 16 Retirement System or Health Service System who are eligible to vote but did not receive an
- 17 individually addressed ballot.
- 18 SEC. 16.560. DELIVERY OF BALLOTS AND INSTRUCTIONS TO ELECTION OFFICERS.
- 19 (a) Members. The *Registrar Department of Elections* or Contractor shall cause the ballots and
- accompanying envelopes to be mailed or delivered pursuant to Section 16.559(a) not later
- than 10 days prior to the fFirst  $\forall V$ oting dDay, along with written instructions for their proper
- distribution and collection and any other pertinent guidelines as set out in these provisions or
- as otherwise applicable.

- 1 (b) Retired Members. The *Registrar Department of Elections* or Contractor shall deposit in the
- 2 mail the ballots and accompanying envelopes to each retired member at least 10 business
- 3 days prior to the fFirst  $\forall V$ oting dDay.
- 4 SEC. 16.561. DUTIES OF ELECTION OFFICERS.
- 5 Each Election Officer shall:
- 6 (a) Prior to the date that ballots are delivered, inform the department or employee
- 7 responsible for distributing paychecks to employees of the department of the dates during
- 8 which ballots are to be distributed to employees and of the responsibility of the Payroll
- 9 Department to make arrangements to distribute a ballot with each paycheck by a date that will
- allow each voter at least three days to mark and deliver the ballot;
- 11 (b) Upon receipt of the ballots, coordinate his or her efforts and those of the Payroll
- Department to insure that the ballots are ready to be distributed along with paychecks by a
- 13 date that will allow each voter at least three days to mark and deliver the ballot;
- 14 (c) Provide notice to employees who are in the Retirement System or Health Service System
- but would not be likely to receive ballots along with their paychecks, such as employees on
- the temporary payroll, that ballots are available;
- 17 (d) Provide ballots to employees who did not, or would not, receive them along with their
- 18 paychecks pursuant to the procedure established by the Registrar Department of Elections or
- 19 Contractor;
- 20 (e) Establish and maintain a collection procedure so that employees have a convenient
- 21 method of returning ballots, which method shall, where possible, make use of at least one
- container in which ballots can be placed; and
- 23 (f) Return the ballots which have been received or otherwise collected according to the
- collection procedure established by such officer to the *Registrar Department of Elections* or

1	Contractor, eitner personally or by the inter-office mail system, in a timely manner so that the
2	ballots will be delivered to the Registrar Department of Elections or Contractor by the date
3	established by the Retirement Board, or the Health Service Board or Retiree Health Trust Fund
4	Board as the final date for such delivery.
5	SEC. 16.562. DUTY OF PAYROLL DEPARTMENT.
6	The Payroll Department shall provide cooperation and assistance in sorting the ballots or
7	performing other tasks necessary to insure that the ballots are distributed along with
8	paychecks by a date that will allow each voter at least three days to mark and deliver the
9	ballot.
10	SEC. 16.563. COUNTING OF BALLOTS AND CERTIFICATION OF NEW TRUSTEE.
11	(a) The Registrar Department of Elections or Contractor shall thereafter count the ballots in
12	such a manner that the identity of the individual casting any particular ballot will not be
13	disclosed. Each ballot shall be counted so long as it has been properly marked, signed and
14	delivered. The Registrar Department of Elections or Contractor shall certify the new Health
15	Service Board or Retiree Health Trust Fund Board trustee.
16	(b) Within five days of the close of voting and prior to certification, the Retiree Health Trust Fund
17	Board secretary shall attest to the Department of Elections or contractor that there is one retired
18	member trustee and one active member trustee candidate to fill the two elected Retiree Health Trust
19	Fund Board trustee positions. For purposes of Retiree Health Trust Fund Board elections, the date of
20	the election shall be the day the election is certified by the Department of Elections or Contractor. In
21	the event that the active member candidate with the highest number of votes is no longer an active

member on the day the election is certified, the Department of Elections shall certify the active member

candidate with the next highest number of votes. In the event that the retired member candidate with

the highest number of votes is no longer a retired member on the day the election is certified, the

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1	Department of Elections shall certify the retired member candidate with the next highest number of
2	votes.
3	(c) Within five days of the close of voting and prior to certification, the <i>Executive Director of</i>
4	Secretary General Manager for the Retirement System shall attest to the Registrar Department of
5	$\underline{\mathit{Elections}} \text{ or Contractor whether there is a retired member serving as trustee on the Retirement}$
6	Board:
7	(a)(i) If, at that time, there is no retired member serving as trustee, the Registrar Department of
8	$\underline{\it Elections}$ or Contractor shall certify the individual receiving the highest number of votes as the
9	newly elected trustee of the Retirement Board.
10	$(b)(ii)$ If, at that time, there is a retired member serving as trustee, the $Registrar\ Department\ of$
11	Elections or Contractor shall certify the member (not a retired member) receiving the highest
12	number of votes as the newly elected trustee of the Retirement Board.
13	Where there is no vacancy, the Registrar Department of Elections or Contractor shall certify the
14	new Retirement Board trustee as close to the expiration of the term as reasonably possible.
15	SEC. 16.564. RETIREMENT BOARD, OR-HEALTH SERVICE BOARD OR RETIREE
16	<u>HEALTH TRUST FUND BOARD</u> TO REIMBURSE <u>REGISTRAR</u> <u>DEPARTMENT OF</u>
17	ELECTIONS.
18	The Retirement Board, or Health Service Board or Retiree Health Trust Fund Board shall
19	reimburse the Office of the Registrar Department of Elections for the actual expenses incurred by
20	it in conducting Retirement Board, or Health Service Board or Retiree Health Trust Fund Board
21	elections <u>respectively</u> . The Retirement Board, <u>or</u> Health Service Board <u>or Retiree Health Trust</u>
22	Fund Board shall pay all Contractor expenses when the respective Board specifies that a
23	Contractor conduct a Retirement Board, or Health Service Board or Retiree Health Trust Fund
24	Board election.

1	SEC. 16.565. GIVING, RECEIVING ANYTHING OF VALUE IN CONSIDERATION OF
2	VOTING PROHIBITED.
3	(a) No person shall directly or through any other person pay, lend, or contribute or offer or promise
4	to pay, lend, or contribute, any money or other valuable consideration to or for any voter or to or for
5	any other person to:
6	(1) Induce any person to:
7	(A) Vote at any Retirement Board, Health Service Board or Retiree Health Trust Fund
8	Board election;
9	(B) Refrain from voting at any Retirement Board, Health Service Board or Retiree
10	Health Trust Fund Board election;
11	(C) Vote or refrain from voting at a Retirement Board, Health Service Board or Retiree
12	Health Trust Fund Board election for or against any particular person or measure; or
13	(2) Reward any person for having:
14	(A) Voted at any Retirement Board, Health Service Board or Retiree Health Trust Fund
15	Board election;
16	(B) Refrained from voting at any Retirement Board, Health Service Board or Retiree
17	Health Trust Fund Board election; or
18	(C) Voted or refrained from voting at a Retirement Board, Health Service Board or
19	Retiree Health Trust Fund Board election for or against any particular person or
20	<u>measure.</u>
21	(b) No person may directly or through any other person solicit, accept, receive, agree to accept, or
22	contract for, before, during or after a Retirement Board, Health Service Board or Retiree Health Trust
23	Fund Board election, any money, gift, loan, or other valuable consideration, offer, place, or
24	employment for himself or herself or any other person because he or she or any other person:

1	(1) Voted or agreed to vote at any Retirement Board, Health Service Board or Retiree Health	
2	Trust Fund Board election;	
3	(2) Refrained or agreed to refrain from voting at a Retirement Board, Health Service Board or	
4	Retiree Health Trust Fund Board election;	
5	(3) Voted, agreed to vote, refrained from voting, or agreed to refrain from voting for or	
6	against any particular person or measure at a Retirement Board, Health Service Board or	
7	Retiree Health Trust Fund Board election; or	
8	(4) Induced any other person to:	
9	(A) Vote or agree to vote at any Retirement Board, Health Service Board or Retiree	
10	Health Trust Fund Board election;	
11	(B) Refrain from voting or agree to refrain from voting at a Retirement Board, Health	
12	Service Board or Retiree Health Trust Fund Board election; or	
13	(C) Vote, agree to vote, refrain from voting, or agree to refrain from voting for or	
14	against any particular person or measure at a Retirement Board, Health Service Board	
15	or Retiree Health Trust Fund Board election.	
16	(c) Any person violating any of the provisions of this section shall be guilty of a misdemeanor and,	
17	upon a final judgment of conviction of same, shall be removed from office and may also be subject to a	
18	penalty of not more than six months in jail and/or fine of not more than \$1,000, as well as removal.	
19	(d) "Person" means an individual, partnership, corporation, association, firm or other organization or	
20	entity, however organized.	
21	(e) Nothing in this section shall prohibit the following:	
22	(1) Making an expenditure for, offering, providing, accepting or receiving transportation to or	
23	from the polls; or	
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1	(2) Making an expenditure for, organizing or attending a gathering providing complementary		
2	food, beverages and/or entertainment, provided that no valuable consideration is offered		
3	promised, solicited, accepted or received in consideration of the conduct described		
4	subsection (a); or		
5	(3) Making expenditures for the organization and conduct of get-out-the-vote rallies.		
6	(f) Pursuant to the procedures set forth in San Francisco Charter sections 15.102 and C3.699-10 e		
7	seq., the Ethics Commission shall adopt regulations consistent with this section for the purpose of		
8	implementing this Section while avoiding any application that would prohibit conduct protected by the		
9	United States Constitution or the California Constitution.		
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11	Section 2. The San Francisco Campaign and Governmental Conduct Code is hereby		
12	amended by adding section 3.1-268 to read as follows:		
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14	SEC. 3.1-268. RETIREE HEALTH CARE TRUST FUND		
15	Desire at all Desiries and Displaces Cotton airs		
16	Designated Positions and Disclosure Categories		
17	Retiree Health Trust Fund Board Member 1		
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19			
20	APPROVED AS TO FORM:		
21	DENNIS J. HERRERA, City Attorney		
22	Rv.		
23	By: ERIK A. RAPOPORT Deputy City Attorney		
24	Deputy Oily Attorney		
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