

RESOLUTION NUMBER R- 290926

ADOPTED ON NOV 10 1998

RESOLUTION ADOPTING THE REVISED CONFLICT OF
INTEREST CODE FOR THE SAN DIEGO CITY EMPLOYEES'
RETIREMENT SYSTEM.

WHEREAS, the Political Reform Act (California Government Code sections 81000-91015) requires state and local government agencies to adopt and promulgate conflict of interest codes; and

WHEREAS, California Government Code section 87306.5 requires biennial review of local conflict of interest codes every even-numbered year; and

WHEREAS, as The City of San Diego's code reviewing body, the City Council finds it in the public interest to adopt the standard conflict of interest code promulgated by the FPPC in Regulation 18730 and hereby declares its intention to incorporate by reference the terms of FPPC Regulation 18730 and any amendments to that regulation duly adopted by the FPPC as part of each conflict of interest code for which the City Council has responsibility; and

WHEREAS, the San Diego City Employees' Retirement System has proposed changes to the Appendix A and Appendix B of its Conflict of Interest Code to clarify disclosure requirements and to better conform to the Government Code; NOW, THEREFORE,

BE IT RESOLVED that the proposed changes to Appendix A, in which persons are designated, and Appendix B, in which disclosure categories are set forth, are hereby approved and are incorporated into the San Diego City Employees' Retirement System's Conflict of Interest Code.

BE IT FURTHER RESOLVED that Appendix A and Appendix B, as revised, be placed on file in the Office of the City Clerk as Document No. RR- 290926.

BE IT FURTHER RESOLVED that the revised Conflict of Interest Code for the San Diego City Employees' Retirement System become effective upon the date of adoption of this resolution.

APPROVED: CASEY GWINN, City Attorney

By Lisa A. Foster
Lisa A. Foster
Deputy City Attorney

LAF:cdk
10/26/98
Or.Dept:Retirement
R-99-219

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM'S CONFLICT OF INTEREST CODE

APPENDIX A

DESIGNATED POSITIONS, DUTIES AND CATEGORIES

<u>Position</u>	<u>Duties</u>	<u>Category</u>
President and Members of the Retirement Board	Members of the Retirement Board who exercise responsibility for the management of public investments.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
Retirement Administrator	Under policy direction of the Retirement Board, manages the routine affairs of Retirement Office and staff; counsels and informs employees regarding options and benefits; has primary responsibility to deal with actuaries, provides assistance and recommendations to Board and its committees.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
Assistant Retirement Administrator	Assists the Retirement Administrator in performance of duties and acts on behalf of Retirement Administrator when necessary.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
Investment Officer	Under the direction of the Retirement Administrator, prepares recommendations regarding investment policy, practices, allocations and instruments; coordinates and participates in the review, selection, evaluation and termination of investment managers; negotiates contracts for investment managers and other investment related activities.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
General Counsel	Provides legal representation, advice and recommendations to the Board and Staff. Directs and reviews the work of the Retirement System's Legal Division.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
Assistant General Counsel	Assists the General Counsel in performance of duties and acts on behalf of the General Counsel when necessary.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)

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OFFICE OF THE CITY CLERK
SAN DIEGO, CALIFORNIA

<u>Position</u>	<u>Duties</u>	<u>Category</u>
Associate Counsel	Under the direction of General and Assistant Counsel, provides legal representation, advice and recommendations to the Board and Staff.	Files 700 Form (Statutory Requirement - Gov't Code § 87200)
Investment Analyst	Advises or makes recommendations to the Investment Officer, Retirement Administrator and the Board by conducting research or an investigation, preparing or presenting a report and/or analysis.	1
Retirement Operations Manager	Advises or makes recommendations to the Retirement Administrator, Assistant Retirement Administrator and the Board by conducting research or an investigation, preparing or presenting a report and/or analysis.	1
Associate Management Analyst	Advises or makes recommendations to the Retirement Administrator, Assistant Retirement Administrator, Retirement Operations Manager and the Board by conducting research or an investigation, preparing or presenting a report and/or analysis.	1
Audit Accountant	Advises or makes recommendations to the Investment Officer, Retirement Administrator and the Board by conducting research or an investigation, preparing or presenting a report and/or analysis.	1
Senior Legal Retirement Assistant	Advises or makes recommendations to the General Counsel, Assistant General Counsel and Board by performing research, participating in the formulation or administration of Board policies and programs and preparing or presenting reports and/or analysis.	1
Retirement Legal Assistant	Advises or makes recommendations to the General Counsel, Assistant General Counsel, and Board by participating in the formulation or administration of Board policies and programs and preparing or presenting reports and/or analysis.	1

Position

Duties

Category

Consultant

Provides advice to the Board concerning the establishment and amendment of the Board's Investment Guidelines. Assists the Board in reviewing the activities of the System's investment managers and individual transactions relative to compliance with the City Charter and the Board's Investment Guidelines.

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Investment Manager

Exercises discretionary authority over those funds or accounts designated to be under his or her supervision. Directs investments in those accounts without prior consultation with the Board or Staff. Initiates, negotiates and completes purchases and sales of securities and properties within the portfolio(s) under his or her supervision. Makes decisions and recommendations within the Board's Investment Guidelines and City Charter.

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SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM'S CONFLICT OF INTEREST CODE

APPENDIX B

DISCLOSURE CATEGORY

Category 1: Investments and business positions in any business entity that supplies goods or services to the Retirement System, and in any security which was or is held by any fund administered by Board of Administration wherein the reporting party's interest in said security amounts to one percent (1%) or more of the issue of that security.

Income and gifts from any person or business entity that supplies goods or services to the Retirement System.

Interests in real property.

For purposes of this Appendix, "goods or services" means goods or services supplied by any actuarial, accounting, banking, financial, investment or consulting firm.

For purposes of this Appendix, an interest in real property is any property located in or within two miles of the City of San Diego or within two miles of any land owned by the Retirement System as set forth in the Attachment to this Appendix which lists the real properties owned by the Retirement System in its Direct and Co-investment Real Estate Portfolio. A copy of this attachment is also on file in the Retirement Office.

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SDCERS' Direct and Co-Investment Real Estate Portfolio

MANAGER	PROPERTY NAME	PROPERTY TYPE	OWNERSHIP	YEAR ACQUIRED
SSR Realty Advisors	The Enclave Apartments 9500 Osuna Road, N.E. Albuquerque, New Mexico 87111-2282	200 unit Apartment Complex	50%	1995
SSR Realty Advisors	Heather Ridge Apartments 16021 English Oaks Avenue Bowie, Maryland 20716	324 unit Apartment Complex	27.46%	1995
SSR Realty Advisors	Cortesia at Parkside 3990 Spring Valley Road Farmers Branch, Texas 75244	274 unit Apartment Complex	50%	1998
US Realty Advisors	Edwards Supermarket 3083 - 3087 Jericho Turnpike Elwood, New York 11731-6206	Supermarket	33.33%	1996
US Realty Advisors	Four Allegheny Center 200 Lancaster Avenue Wayne, Pennsylvania 19087-4046	Medical Office Building	33.33%	1996
US Realty Advisors	Bed, Bath & Beyond Yoder Plaza (to be built) Jefferson Avenue Newport News, Virginia	Home Accessory Superstore	100%	1998
US Realty Advisors	Ingram Micro Inc. 1759 Wehrle Drive Amherst, New York 14221-7887 395 Youngs Road Amherst, New York 14221-5831	Two Building Office Campus	33.33%	1998

MANAGER	PROPERTY NAME	PROPERTY TYPE	OWNERSHIP	YEAR ACQUIRED
US Realty Advisors	<p>ACCOR - Portfolio of 16 Motel 6 Hotels:</p> <p>3960 Nine Mile Road Cincinnati, Ohio 45255-4930</p> <p>330 Goff Mountain Road Cross Lanes, West Virginia 25313-1415</p> <p>8300 Chicago Road Warren, Michigan 48093-1679</p> <p>704 North Leavitt Road Amherst, Ohio 44001-1133</p> <p>546 MacArthur Drive Alexandria, Louisiana 71303-3162</p> <p>2185 S W Loop 410 San Antonio, Texas 78227-2536</p> <p>111 East Sheldon Street Prescott, Arizona 86301-3113</p> <p>5555 West 34th Houston, Texas 77092-6507</p> <p>5310 San Bernardo Avenue Laredo, Texas 78041-3006</p> <p>5120 Hinkleville Road Paducah, Kentucky 42001-9132</p> <p>298 Atascadero Road Morro Bay, California 93442-1598</p> <p>9400 El Camino Real Atacadero, California 93422-5514</p>	Limited Service Motel	100%	1998

MANAGER	PROPERTY NAME	PROPERTY TYPE	OWNERSHIP	YEAR ACQUIRED
US Realty Advisors	Motel 6 (continued): 63950 20th Avenue North Palm Springs, California 900 Quince Avenue Escondido, California 92025-4727 2749 South Carson Street Carson City, Nevada 89701-5502 1405 Dunn Road St. Louis, Missouri 63138-2039			
US Realty Advisors	HealthEast Properties, Inc. Woodlands Health Campus (to be built) Woodbury, Minnesota St. John's Medical Campus (to be built) Maplewood, Minnesota	2 Medical Office Buildings	100%	1998
RREEF Funds	Mountain Pacific 11808 - 11820 Northup Way N.E. Bellevue, Washington 98005	2 Suburban Office Buildings	100%	1997
RREEF	Lincoln Business Center 12255 Kirkham Road 12245 Kirkham Road 12215 Kirkham Road 12255 Kirkham Road Poway, CA 92064	Industrial Park	100%	1998

CERTIFICATION

The foregoing amendment to the Conflict of Interest Code was prepared by the San Diego City Employees' Retirement System after a fair opportunity was offered to the members of the Retirement System to present their views.

9/10/98

Date

Lawrence B. Grissom

Lawrence B. Grissom

Retirement Administrator