

**SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM  
 CONFLICT OF INTEREST CODE  
 APPENDIX A  
 Designated Positions**

<u>Position</u>	<u>Duties</u>	<u>Category</u>
1. <u>Members of the Retirement Board also known as "Trustees"</u>	Board Members/Trustees exercise responsibility for the management of public Investments, and are identified in SDMC §§27.3503, 27.3510 as statutory filers subject to Government Code §87200)	Form 700 (Gov't Code § 87200)
2. <u>Chief Executive Officer</u>	Under policy direction of the Retirement Board, manages the routine affairs of Retirement Office and staff; directs SDCERS Staff, sets policy direction for Staff; counsels and informs employees regarding Options and benefits; has primary responsibility to deal with actuaries, provides assistance and recommendations to the Board and its committees.	1 – Form 700 (Local Code Filer Under SDMC §27.3503; Gov't Code §87300)
3. <u>Deputy Chief Executive Officer/Compliance and Legal Operations</u>	Under the direction of the CEO, provides legal representation, advice, and recommendations to the Board and staff; directs and reviews the work of SDCERS' Legal Division and outside legal firms. Develops and maintains procedures to prevent illegal, unethical or improper conduct; develops and updates ethics standards for Board and staff; ensures compliance with federal tax laws; and monitors compliance with local, state and federal laws and conducts investigations as required.	1
4. <u>Chief Financial Officer</u>	Under the direction of the CEO, directs, manages and coordinates finance, accounting and budget operations; develops and administers department budget; prepares reports for the Board as assigned; directs preparation of annual financial report (CAFR) and all interactions with the Independent Auditor; develops staff policy direction, goals and schedules to provide information as requested by the independent actuary for completion of annual actuarial valuations; develops and implements department goals, objectives, policies and procedures. directs and manages benefits administration staff in the delivery of services and benefits to SDCERS' members, including calculating and preparing pension payments; administering health benefits processing enrollments and terminations; tracking service credit and member contributions; reconciling	1

deceased member accounts; and processing beneficiary payments.

5. **Chief Investment Officer** Under the direction of the CEO, 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. 1
6. **Assistant General Counsel** Under the direction of the Deputy CEO, acts on behalf of the Deputy CEO when necessary, and provides legal representation, advice, and recommendations to the Board and staff. 1
7. **Member Services Division Director** Under the direction of the CEO, oversees customer service functions, including Call Center, direct correspondence and meetings with Members. Resolves complex Member benefit issues, and directs all member counseling, education and outreach activities 1
8. **Benefits Administration Director** Under the direction of the CEO, oversees benefits administration; directs and manages benefits administration staff in the delivery of services and benefits to SDCERS' members, including calculating and preparing pension payments; administering health benefits processing enrollments and terminations; tracking service credit and member contributions; reconciling deceased member accounts; and processing beneficiary payments. 1
9. **Chief Information Officer** Under the direction of the CEO, directs and manages information technology staff, contractors, consultants, vendors and technical services contracts; manages technical infrastructure and facilities, desktop services, application support, Help Desk, IT procurement and system implementation and integration projects; manages Board of Administration audio/video production; develops and manages division budget to support business operations; develops and implements IT Strategic Plan and initiatives to support SDCERS' business objectives; develops, implements and enforces organizational IT policies and procedures. 1
10. **Senior Investment Officer** Under the direction of the Chief Investment Officer, advises and makes recommendations to the Chief Investment Officer, CEO, and the Board by conducting research and investigations, preparing 1

or presenting reports and/or analysis and acts as back-up to the Chief Investment Officer when the Chief Investment Officer is unavailable.

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| 11. | <b><u>Investment Officer</u></b>        | Under the direction of the Chief Investment Officer, advises and makes recommendations to the Chief Investment Officer, CEO, and the Board by conducting research and investigations, preparing or presenting reports and/or analysis.  | 1 |
| 12. | <b><u>Internal Auditor</u></b>          | Under the direction of the Board Audit Committee and Board, plans, conducts, and reports on internal audit projects; evaluates SDCERS' internal control procedures and processes; evaluates compliance with governing laws, policies and procedures; coordinates audit efforts with external auditors; assists the Audit Committee in its review of the Comprehensive Annual Financial Report (CAFR); and performs investigations or other duties as requested by SDCERS' CEO or the Audit Committee.   | 1 |
| 13. | <b><u>Disability Review Officer</u></b> | Under the direction of the General Counsel, reviews disability applications for compliance with medical and administrative requirements; makes recommendations to the Board of Administration and the Disability Committee regarding eligibility for disability retirements by preparing or presenting reports and analysis.  | 1 |
| 14. | <b><u>Controller</u></b>                | Under the direction of the CEO, directs and manages accounting staff; prepares financial reports for the Board; prepares financial analyses for management, actuaries, plan sponsors, and consultants as assigned; implements department goals, objectives, policies and procedures; oversees the maintenance of accounting system and related interfaces; oversees the preparation of the annual state comptroller's report; coordinates preparation of the annual financial report (CAFR) and interactions with the independent auditor.                            | 1 |
| 15. | <b><u>Communications Manager</u></b>    | Under the direction of the SDCERS Deputy CEO, the Communications Manager is responsible for ensuring the accuracy, consistency, timeliness and functionality of SDCERS' broad range of communication responsibilities to its membership, plan sponsors, media, and general public, manages the budget for communications and is responsible for procurement of and contracts necessary to complete her duties such as, but not limited to, contracts related to printing services, mailing services, web site design and other vendors and consultants, as necessary. | 1 |

16. **Consultant** An individual who, pursuant to a contract with SDCERS: 1  
(1) authorizes SDCERS to enter into, modify or renew a contract requiring agency approval, (2) grants agency approval to a contract requiring agency approval, or (3) serves in a staff capacity and, in that capacity, performs duties that would otherwise be performed by a designated position without supervision of that designated position.
17. **Investment Manager** Exercises discretionary authority over those funds or accounts designated to be under his or her supervision. 1  
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.

**SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM**  
**CONFLICT OF INTEREST CODE**  
**APPENDIX B**  
**Disclosure Categories**

Category 1:

Investments and business positions in any business entity that supplies goods or services to SDCERS, 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 1% or more of the issue of that security.

Income and gifts from any person or business entity that supplies goods or services to SDCERS.

Interests in real property.

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

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



**Direct Real Estate Portfolio Holdings as of June 30, 2014**

	PROPERTY NAME	PROPERTY TYPE
1.	4040 North Central Expressway Dallas, TX 75204	Office
2.	Airport 100 Industrial, Inc. Hanover, Maryland	Industrial
3.	Barton Creek Office Building II Austin, TX	Office
4.	Chelmsford Office Bldg Chelmsford, MA	Office
5.	Eagan Town Center Eagan, MN	Retail
6.	Foothills Corporate Center Phoenix, AZ	Office
7.	Fremont Business Center Fremont, CA	Industrial
8.	Latitudes at the Moors Miami, FL	Multi-Family
9.	Metropolitan Business Center Trevose, PA	Industrial
10.	New Ridge Benson Hanover, MD	Industrial
11.	Towers Industrial Park City of Industry, CA	Industrial
12.	Windsor Commons Jacksonville, FL	Retail
13.	Country Club Plaza Miami, FL	Retail
14.	Caballero Industrial Buena Park, CA	Industrial
15.	La Costa Apartments Boynton Beach, FL	Multi-Family
16.	Pacella Park Randolph, MA	Industrial
17.	New Chalet Apartments Monhegan, NY	Multi-Family
18.	Rancho Hills Apartments Vista, CA	Multi-Family
19.	Caballero Industrial II Buena Park, CA	Industrial
20.	Tigard Corporate Center Tigard, Oregon	Office