

**BY AUTHORITY**

ORDINANCE NO. \_\_\_\_\_  
SERIES OF 2023

COUNCIL BILL NO. CB23-0552  
COMMITTEE OF REFERENCE:  
Business, Arts, Workforce & Aviation Services

**A BILL**

**For an ordinance establishing a system of licensing and inspections of secure transportation services.**

**BE IT ENACTED BY THE COUNCIL OF THE CITY AND COUNTY OF DENVER:**

**Section 1.** Amend the title of Chapter 17, D.R.M.C. by adding the language underlined and deleting the language stricken, to read as follows:

**Chapter 17 – ~~EMERGENCY~~ MEDICAL VEHICLES AND SECURE TRANSPORTATION SERVICES**

**Section 2.** Article II of Chapter 17 shall be amended by adding the language underlined and deleting the language stricken to read as follows:

**Sec. 17-11. – Definitions.**

The following words and phrases, when used in this ~~article~~chapter, shall have the meanings respectively ascribed to them:

(1) Abuse means any of the following acts:

(a) The non-accidental infliction of bodily injury, serious bodily injury, or death;

(b) Confinement or restraint that is unreasonable under generally accepted standards; or

(c) Subjection to nonconsensual sexual conduct or contact.

(2) Background check means a national criminal history records check conducted by the federal bureau of investigation upon submission of fingerprint records and all required documents.

(3)-(4) Based means a ~~medical~~-vehicle headquartered in or having a substation or office or a permanent station in the city, and whose primary response is dedicated to transporting patients originating in the city.

(2)(4) Behavioral health crisis means a significant disruption in a person's mental or emotional stability or functioning resulting in an urgent need for immediate assessment and treatment to prevent a further or serious deterioration in the person's mental or physical health.

(5) Board means the board of public health and environment.

(6) Chemical Restraint means giving an individual medication involuntarily for the purpose of restraining that individual; except that "chemical restraint" does not include the involuntary

1 administration of medication pursuant to C.R.S. § 27-65-111(5), or administration of medication for  
2 voluntary or life-saving medical procedures.

3 (7) Director means the director of the Denver Department of Excise and Licenses.

4 ~~(3)~~ (8) Emergency means any actual or self-perceived event which threatens life, limb or  
5 well-being of an individual in such a manner that immediate medical care is needed.

6 ~~(4)~~ (9) Emergency medical technician means any individual who, in accordance with  
7 ~~Section C.R.S. § 25-3.5-101 et seq., C.R.S.,~~ and its implementing regulations, holds a valid  
8 certificate as a paramedic, emergency medical technician-intermediate, or emergency medical  
9 technician-basic issued by the Colorado Department of Health.

10 ~~(5)~~ (10) Emergency medical vehicle means any privately or publicly owned land or airborne  
11 vehicle, especially constructed or modified and equipped, intended to be used, and maintained or  
12 operated for the transportation upon the streets and highways in the city, of individuals who are  
13 sick, or injured or otherwise incapacitated or helpless; except fixed wing aircraft operating  
14 between the city and locations outside the city.

15 ~~(6)~~ (11) Emergency medical vehicle service means the furnishing, operating, conducting,  
16 maintaining, advertising, or otherwise engaging in or professing to be engaged in the business of  
17 transportation of patients by emergency medical vehicle. Taken in context, it also means the  
18 person so engaged or professing to be so engaged. The person so engaged and the vehicles  
19 used for the emergency transportation of persons injured at a mine are excluded from this  
20 definition when the personnel utilized in the operation of said vehicles are subject to the  
21 mandatory safety standard of the Federal Mine Safety and Health Administration, or its successor  
22 agency.

23 (12) Exploitation means an act or omission committed by a person who:

24 (a) Uses deception, harassment, intimidation, or undue influence for their personal  
25 gain to permanently or temporarily deprive a patient of the use, benefit, or possession of anything  
26 of value;

27 (b) Forces, compels, coerces, or entices a patient for the profit or advantage of the  
28 person or another person against the will of the patient; and/or

29 (c) Misuses the property of a patient in a manner that adversely affects the patient's  
30 ability to receive services of care.

31 (13) Independent secure transportation provider means a secure transportation provider  
32 who is not employed by a licensed secure transportation business.

33 ~~(7)~~ (14) Manager means the manager of the department of public health and environment.

34 ~~(8)~~ (15) Medical vehicle permit means the authorization issued by the director of excise and

1 licenses and approved by the manager of public health and environment with respect to a medical  
2 vehicle used or to be used to provide medical vehicle service in the city.

3 ~~(9)~~(16) *Medical vehicle validation sticker* means a sticker displayed on the left side of the  
4 windshield of a medical vehicle unit that has been inspected and issued a permit to operate in the  
5 city. The sticker shall indicate the year of validation and shall be provided by the director of excise  
6 and licenses.

7 ~~(10)~~(17) *License* means the authorization issued by the director ~~of excise and licenses~~ to  
8 operate a medical vehicle service or to provide secure transportation in the city.

9 ~~(11)~~(18) *Licensee* means the person or entity that has been issued a license by the city to  
10 provide medical vehicle services or secure transportation in the city.

11 ~~(12)~~(19) *Medical facility* means licensed hospitals and nursing homes.

12 ~~(13)~~(20) *Medical vehicle* means an emergency or nonemergency medical vehicle,  
13 excluding vehicles used for secure transportation.

14 ~~(14)~~(21) *Medical vehicle service* means any person or entity which operates emergency  
15 medical vehicles or nonemergency medical vehicles.

16 ~~(15)~~(22) *Nonemergency medical vehicle* means any surface vehicle for hire equipped to  
17 transport sick or disabled persons and to provide nonemergency medical services, excluding  
18 vehicles used for secure transportation.

19 ~~(16)~~(23) *Patient* means any individual who is sick, injured, experiencing a behavioral health  
20 crisis, or otherwise incapacitated or helpless.

21 ~~(17)~~(24) *Physician Advisor* means a physician who establishes protocols or medical acts  
22 performed by EMT-Basics, EMT-Intermediates, EMT-Paramedics, and/or non-emergency medical  
23 vehicle operators of a prehospital emergency medical care service agency, and who is specifically  
24 identified as being responsible to assure the competency of the performance of the acts by such  
25 EMT-Basics, EMT-Intermediates, EMT-Paramedics and/or non-emergency medical vehicle  
26 operators. A "Physician Advisor" shall meet all qualifications as outlined in the "RULES DEFINING  
27 THE DUTIES AND RESPONSIBILITIES OF EMERGENCY MEDICAL SERVICES PHYSICIAN  
28 ADVISORS AND THE AUTHORIZED MEDICAL ACTS OF EMERGENCY MEDICAL  
29 TECHNICIANS AND PARAMEDICS" (3-CCR-713-6) of the "ACTS ALLOWED" published and  
30 approved October, 1994, by the EMS Division of the Colorado Department of Public Health and  
31 Environment.

32 (25) Secure transportation or secure transportation services shall have the meaning set  
33 forth in C.R.S. § 25-3.5-103(11.4).

34 (26) Secure transportation business means any form of business or commerce involving

1 the transport of a patient experiencing a behavioral health crisis from any point within the City and  
2 County of Denver.

3 (27) Secure transportation provider means a person engaged in any form of business or  
4 commerce involving the transport of a patient experiencing a behavioral health crisis from any  
5 point within the City and County of Denver.

6 (28) Secure transportation vehicle means a vehicle conducting secure transportation  
7 services in the city.

8 ~~(1829)~~ *To operate in the city* means the providing of medical vehicle service or secure  
9 transport of patients originating within the boundaries of the City and County of Denver.

10 (30) Vehicle permit validation sticker means a sticker displayed on the left side of the  
11 windshield of a secure transportation vehicle that has been inspected and issued a permit to  
12 operate in the city. The sticker shall indicate the year of validation and shall be provided by the  
13 director to operate a secure transportation vehicle in the city.

14  
15 **Section 3.** A new Article IV of Chapter 17 shall be added to read as follows:

16 **ARTICLE IV. –SECURE TRANSPORTATION BUSINESSES, PROVIDERS, AND**  
17 **VEHICLES**

18 **Sec. 17-81. – Legislative Intent.**

19 The purpose of this article is to provide standards to safeguard the public welfare by  
20 regulating and controlling the inspection, licensure, and operation of private secure transportation  
21 services for individuals experiencing behavioral health crises within the city as required under  
22 C.R.S. § 25-3.5-103. This article establishes a regulatory and service system to provide secure  
23 transportation services, with different requirements from traditional ambulance services, for  
24 individuals experiencing a behavioral health crisis.

25 **Sec. 17-82. – Licensing required.**

26 (a) *License required.*

27 (1) It shall be unlawful for any person, whether or not they are licensed in another  
28 jurisdiction, to act as a secure transportation provider without first obtaining a valid secure  
29 transportation provider license issued pursuant to this article IV and in compliance with any and all  
30 applicable state and local laws.

31 (2) It shall be unlawful to operate as a secure transportation business without first  
32 obtaining a license as provided in this article and in compliance with any and all applicable state  
33 and local laws.

34 (3) It shall be unlawful for any secure transportation business or provider to engage in

any form of secure transportation services in a vehicle that does not have a valid local vehicle permit issued pursuant to this article IV and in compliance with any and all applicable state and local laws.

(b) *Exemptions.* The requirements of this article do not apply to:

(1) Law enforcement or personnel employed by or contracted with a law enforcement agency, including but not limited to, Denver's Support Team Assisted Response program;

(2) Ground ambulance agencies, licensed pursuant to C.R.S. § 25-3.5-301;

(3) Transportation services provided by the City's Office of Behavioral Health within the Denver Department of Public Health & Environment; and

(4) Emergency service patrols established pursuant to C.R.S. § 27-81-115.

#### **Sec. 17-83. – Types of licenses and permits.**

(a) *Secure transportation business licenses.*

(1) *Class A* licenses are required for secure transportation businesses that provide services using physical restraint during transport.

(2) *Class B* licenses are required for secure transportation businesses that provide services that do not include the use of physical restraint during transport.

(b) *Secure transportation vehicle permits.*

(1) *Type 1* permits are required for vehicles with permanent safety partitions that separate the driver from the passenger compartment.

(2) *Type 2* permits are required for vehicles without safety partitions that separate the driver from the passenger compartment.

(c) *Secure transportation provider licenses.* A secure transportation provider license is required for each secure transportation vehicle driver and each employee in the vehicle assisting the driver.

#### **Sec. 17-84. – Application requirements.**

*Application requirements.* All private secure transportation business licenses, secure transportation provider licenses, and vehicle permit applications shall be made on forms provided by the director and shall include, in addition to any information required by chapter 32 of this Code, all supplemental materials required by this article and any rules adopted pursuant thereto. The director may, at the director's discretion, require additional documentation associated with the application, as may be necessary, to enforce the requirements of this article IV and the requirements established by the State Board of Health pursuant to C.R.S. § 25-3.5-311.

(a) *Secure transportation business license.* Every application for a secure transportation business license shall contain the following:

(1) The name under which the licensee will operate, the address of the principal place of business, and the name and address of each principal and managing agent;

(2) A description of the specific types of services to be offered;

(3) A statement whether each principal and managing agent, and employee has been convicted of any felony, misdemeanor, traffic, or municipal ordinance violation, the nature of the offence, the penalty or punishment imposed, and the date and place such offense occurred;

(4) A statement whether a judgment for fraud, deceit, or misrepresentation was ever entered against any principal, managing agent, and employee and the details thereof;

(5) Proof of the following insurance coverage, issued by an insurance company authorized to write liability insurance in Colorado:

(I) Liability insurance for injuries in the amount of \$1,000,000 for each individual claim;

(II) Liability insurance in the amount of \$3,000,000 for all claims made against the secure transportation service or against its personnel;

(III) Liability insurance coverage in the amount of the maximum recoverable amount under the Colorado Governmental immunity Act, C.R.S. § 24-10-101, et. seq., when the secure transportation service provider is a public entity or public employee pursuant to C.R.S. § 24-10-103(5); and

(IV) Proof of worker's compensation coverage in compliance with the Worker's Compensation Act of Colorado, C.R.S. § 8-40-101, et. seq.

(b) *Secure transportation vehicle permit.* Every application for a secure transportation vehicle permit shall contain the following:

(1) Verification of a successful vehicle inspection, in the form required by the manager, that the secure transportation vehicle to be used by the applicant complies with the provisions of article IV and the requirements established by the State Board of Health pursuant to C.R.S. § 25-3.5-311. The director shall not accept verification of a successful inspection if the verification is completed more than ninety (90) days prior to the application date.

(2) Proof of valid and current minimum vehicle insurance coverage as defined by C.R.S. §§ 10-4-609 and 42-7-103(2) with the City and County of Denver endorsed as an additional insured.

(c) *Secure transportation provider license.* Every application for a secure transportation provider license shall contain the following:

(1) A statement whether the applicant has been convicted of any felony, misdemeanor or municipal ordinance violation (including traffic violations), the nature of the offense, the penalty

or punishment imposed, and the date and place where such offense occurred;

(2) A statement whether a judgment for fraud, deceit, or misrepresentation was ever entered against the applicant and the details thereof;

(3) A statement of the applicant's work and/or school history for the five (5) years immediately preceding the date of application;

(4) A certificate of a licensed physician, registered nurse, or physician assistant licensed by the Colorado Medical Board, stating that the applicant was examined within sixty (60) days of the application date and found to be physically and mentally capable of performing secure transportation services in a manner that will not jeopardize the health, welfare, or safety of any person; and

(5) A background check as described in section 17-11 of this Code completed no more than sixty (60) days before the application date.

**Sec. 17-85 – Licensing requirements.**

(a) In addition to the provisions applicable to all licenses, all licensees shall maintain records of compliance with all vehicle, staffing, operating standards and procedures (clinical and medical), training procedures, written policy and procedures, medical protocol, and quality management program requirements established by the State Board of Health pursuant to C.R.S. § 25-3.5-311.

(b) Such records shall be provided upon any request from any inspector of the city or the director within three (3) business days following the request.

**Sec. 17-86 – Inspections.**

(a) At least once annually, the manager shall require inspection and certification, in the manner determined by the manager, of secure transportation vehicles for:

(1) Installation and proper operation and maintenance of safety equipment required by law or by regulations pursuant to this article.

(2) Availability, adequacy, maintenance, and operability of such vehicles and of the related medical and safety equipment in accordance with standards set by the manager. Maintenance records shall be made immediately available upon request of the manager.

(3) Compliance with C.R.S. § 25-3.5-311 and all rules and regulations adopted pursuant thereto.

(b) The results of such inspections, together with recommendations by the manager, shall be forwarded to the director by the manager.

(c) The manager is hereby authorized to require reinspection at any time.

(d) The inspections pursuant to this section shall not excuse compliance with any other Colorado motor vehicle safety laws or requirements.

1           **Sec. 17-87 – Vehicle permit validation sticker and identification.**

2           A secure transportation vehicle shall prominently display, in a place designated by the  
3 director, a vehicle permit validation sticker issued by the city.

4           **Sec. 17-88 – Causes for denial.**

5           In addition to the grounds set forth in chapter 32 of this Code, no license shall be issued or  
6 renewed pursuant to this article IV where:

7           (a) The issuance of a license or permit to the applicant would not comply with any federal,  
8 state, or local law, or any rules and regulations adopted pursuant thereto;

9           (b) The proposed vehicle does not conform to the requirements established by the State  
10 Board of Health pursuant to C.R.S. § 25-3.5-311;

11           (c) The applicant fails to complete any required inspections;

12           (d) The applicant fails to conform with the staffing requirements established by the State  
13 Board of Health pursuant to C.R.S. § 25-3.5-311;

14           (e) The applicant fails to conform with the clinical, medical, and operating standards and  
15 procedures established by the State Board of Health pursuant to C.R.S. § 25-3.5-311;

16           (f) The applicant fails to conform with the quality management program requirements  
17 established by the State Board of Health pursuant to C.R.S. § 25-3.5-311;

18           (g) The applicant does not possess a current and valid driver's license;

19           (h) The applicant's driver's license has been suspended or revoked during the preceding  
20 three years;

21           (i) The applicant has been convicted of or released from incarceration for any felony within  
22 five (5) years of the application date;

23           (j) The applicant has been convicted of or released from incarceration for any misdemeanor  
24 or municipal ordinance offense involving fraud, theft, deceit, or misrepresentation within five (5)  
25 years of the application date;

26           (k) The applicant has been convicted of or released from incarceration for any offense  
27 involving an act of violence against persons or property within five (5) years of the application date,  
28 including but not limited to assault, child abuse, and offenses where the underlying factual basis  
29 has been found to include any act of domestic violence;

30           (l) The applicant has been previously denied a license under this article IV or has had a  
31 license issued under this article suspended or revoked within five (5) years of the application date;

32           (m) The applicant's character and reputation show a pattern of conduct or personal history  
33 that does not demonstrate honesty, fairness, and respect for the rights of others or for the law;

34           (n) The applicant does not have proof of the minimum required insurance coverages pursuant



1 to this article IV; and

2 (o) The applicant has failed to comply with the reporting requirement found in section 17-96  
3 of this article.

4 **Sec. 17-90 – Transferability of license.**

5 A licensee or permit holder shall not sell, assign, or otherwise transfer a license or permit  
6 issued pursuant to this section to another person or vehicle.

7 **Sec. 17-91 – Unlawful acts.**

8 In addition to any other acts prohibited by this Chapter, it shall be unlawful:

9 (a) For any person to be in possession of a weapon as defined in D.R.M.C. 38-116(23) while  
10 performing secure transportation services;

11 (b) For any licensee to hinder or interfere with any investigation under the jurisdiction of the  
12 police department or other public law enforcement agency;

13 (c) For any licensee to violate any rules, regulations, or standards promulgated by the board,  
14 director, or manager;

15 (d) To transport more than one (1) patient per vehicle except under the limited circumstances  
16 provided by the State Board of Health pursuant to C.R.S. § 25-3.5-311;

17 (e) For any person to equip vehicles used to perform secure transportation services in any  
18 manner resembling an emergency vehicle including, but not limited to, the use of lights or sirens, in  
19 violation of any state or local laws;

20 (f) For any person, while performing secure transportation services, to wear a uniform or  
21 badge similar to that worn by any law enforcement agency, including but not limited to the police  
22 department, sheriff's department, or officers of the state patrol;

23 (g) For any person to operate any secure transportation business license, provider license,  
24 or vehicle permit in violation of any state or local law, rule, or regulation;

25 (h) To refuse to provide additional documentation as requested by the director pursuant to  
26 the requirements in this article IV;

27 (i) To administer chemical restraint during secure transportation services;

28 (j) For any licensee to engage in any conduct constituting abuse as defined in this Chapter  
29 17;

30 (k) For any licensee to engage in any conduct constituting exploitation as defined in this  
31 chapter 17;

32 (l) For any licensee to fail to comply with the reporting requirements found in section 17-96  
33 of this article IV;

34 (m) For any person to operate as an independent secure transportation provider; and

(n) For any person to knowingly fail to comply with any order of the board, director, or manager.

**Sec. 17-92 – Term license, renewal.**

(a) *Secure transportation business licenses.* Secure transportation business licenses shall expire three (3) years from issuance unless surrendered, revoked or the secure transportation business changes ownership.

(b) *Secure transportation provider licenses.* Secure transportation provider licenses shall expire one (1) year from issuance unless surrendered or revoked.

(c) *Secure transportation vehicle permits.* Secure transportation vehicle permits shall expire one (1) year from issuance unless surrendered, revoked or the vehicle changes ownership.

(d) *Renewal application materials and deadlines.* Applications to renew a secure transportation business, secure transportation provider license, and vehicle permit shall be made in the manner provided by the director.

(1) Applications for renewal of secure transportation business license shall include:

(i) An affidavit attesting that each of its employees who provide secure transportation services are licensed pursuant to this article IV;

(ii) Proof of insurance showing the minimum amounts required pursuant to this article IV; and

(iii) Any additional information as required by the director.

(2) Application for renewal of secure transportation provider license shall include:

(i) A statement whether the applicant has been convicted of any federal, state, or municipal law violations, including traffic infractions, within the previous twelve months;

(ii) A CBI individual records check from the Colorado Bureau of Investigation completed no more than sixty (60) days before the renewal application date; and

(iv) Any additional information as required by the director.

(3) Application for renewal of secure transportation vehicle permit shall include:

(i) Verification of a successful vehicle inspection, in the form required by the manager, that the secure transportation vehicle to be used by the applicant complies with the provisions with this article IV and the requirements established by the State Board of Health pursuant to C.R.S. § 25-3.5-311. The verification of a successful inspection must be completed no more than ninety (90) days prior to the application date.

(ii) Proof of insurance showing the minimum amounts required pursuant to this article IV; and

(iii) Current and valid vehicle registration.

1 (d) *Denial of renewal.* An application to renew a secure transportation business and provider  
2 license and vehicle permit may be denied if there are causes for denial, suspension, revocation,  
3 non-renewal or other licensing sanctions as provided in Chapter 32 of this Code, this article IV, or  
4 any rules and regulations promulgated thereto.

5 **Sec. 17-93 – Investigation, suspension, revocation, and other sanctions.**

6 In addition to the grounds provided in Chapter 32 of this Code, for investigation, revocation,  
7 suspension, or other sanction of a license, the director may suspend or revoke any license under  
8 this article if the director finds that there are grounds for denial as set forth in this article IV.

9 **Sec. 17-94 – Summary suspension.**

10 Where the director has objective and reasonable grounds to believe and finds, upon a  
11 reasonable ascertainment of the underlying facts, that the licensee has been guilty of deliberate and  
12 willful violation or that the public health, safety, or welfare imperatively requires emergency action  
13 and incorporates the findings in its order, the director may summarily suspend the license and/or  
14 vehicle permit for no longer than thirty days pending proceeding for suspension or revocation which  
15 shall be promptly instituted as provided in Chapter 32 of this Code. The licensee shall receive written  
16 notice of the temporary suspension and a hearing no later than ten (10) days after the temporary  
17 suspension begins.

18 **Sec. 17-95 – Rules and regulations.**

19 (a) The board may adopt such rules and regulations as may be necessary for the protection  
20 of public health related to the operation of secure transportation services.

21 (b) The manager may issue orders to any licensee to comply with this article IV and the rules  
22 and regulations of the board.

23 (c) The director may adopt such rules and regulations as may be necessary for the purpose  
24 of administering and enforcing the provision of this article IV and any other ordinances or laws  
25 relating to and affecting the licensing and operation of secure transportation services.

26 **Sec. 17-96 – Reporting Requirements.**

27 (a) When a secure transportation provider, manager, or administrator of a secure  
28 transportation business is convicted of any crime specified under the causes for denial in this article  
29 they shall notify the director within seventy-two (72) hours of such conviction.

30 (b) When a secure transportation provider, manager, or administrator of a secure  
31 transportation business uses force that results in bodily harm to another person, they shall  
32 immediately contact the local police department where such force was used and shall notify the  
33 director within seventy-two (72) hours of such use of force.

1 (c) When a secure transportation provider's employment is terminated, whether voluntary or  
2 involuntary, both the provider and the secure transportation business shall report the departure to  
3 the department within seventy-two (72) hours. The report shall be made in the manner determined  
4 by the director.

5 **Secs. 17-xx-17xx. – Reserved.**

6  
7 **Section 4.** Article II of Chapter 32 shall be amended by adding the language underlined  
8 and deleting the language stricken to read as follows:

9 **~~Sec. 32-96 – Reserved.~~ Secure transportation license and vehicle permit fees.**

10 Secure transportation providers are subject to the following fees beginning on January 1,  
11 2023:

12 (a) Application fee:

13 (1) Secure Transportation Business License \$50

14 (2) Secure Transportation Provider License \$25

15 (3) Vehicle Permit \$25

16 (b) License fee, per term:

17 (1) Secure Transportation Business License \$250

18 (2) Secure Transportation Provider License \$50

19 (3) Vehicle Permit \$100

20  
21 [BALANCE OF PAGE INTENTIONALLY LEFT BLANK]  
22

1  
2 COMMITTEE APPROVAL DATE: May 10, 2023  
3 MAYOR-COUNCIL DATE: May 16, 2023  
4 PASSED BY THE COUNCIL: \_\_\_\_\_  
5 \_\_\_\_\_ - PRESIDENT  
6 APPROVED: \_\_\_\_\_ - MAYOR \_\_\_\_\_  
7 ATTEST: \_\_\_\_\_ - CLERK AND RECORDER,  
8 EX-OFFICIO CLERK OF THE  
9 CITY AND COUNTY OF DENVER  
10 NOTICE PUBLISHED IN THE DAILY JOURNAL: \_\_\_\_\_;  
11 PREPARED BY: Gennevieve St. Leger, Assistant City Attorney DATE: May 18, 2023  
12 Pursuant to section 13-9, D.R.M.C., this proposed ordinance has been reviewed by the office of the  
13 City Attorney. We find no irregularity as to form and have no legal objection to the proposed  
14 ordinance. The proposed ordinance is not submitted to the City Council for approval pursuant to §  
15 3.2.6 of the Charter.  
16 Kerry Tipper, Denver City Attorney  
17 BY: \_\_\_\_\_, Assistant City Attorney DATE: \_\_\_\_\_  
18