

1 **BY AUTHORITY**

2 ORDINANCE NO. _____

COUNCIL BILL NO. CB18-1507

3 SERIES OF 2019

COMMITTEE OF REFERENCE:

4 Safety, Housing, Education & Homelessness

5 **A BILL**

6 **For an ordinance amending Article XI (Refund Payments to Elderly or Disabled**
7 **Persons) of Chapter 53 of the Denver Revised Municipal Code (Taxation and**
8 **Miscellaneous Revenue).**

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

10 **Section 1.** Section 53-491 of the Denver Revised Municipal Code is hereby amended by
11 deleting the language stricken and adding the language underlined below, to read as follows:

12 **Sec. 53-491. - Legislative intent.**

13 The city council determines and declares that, considering the plight of ~~elderly persons and~~
14 ~~disabled persons~~ older adults and persons with disabilities, who are residents on fixed incomes,
15 caused by the effects of inflation and all matters considered in relation thereto, that the payments
16 provided for in this article to relieve the plight of such ~~elderly persons and disabled persons~~ persons
17 are in the public interest, being reasonable, proper and necessary, and for the public welfare.

18 **Section 2.** Section 53-492 of the Denver Revised Municipal Code is hereby amended by
19 deleting the language stricken and adding the language underlined below, to read as follows:

20 **Sec. 53-492. - Definitions.**

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

23 (1) ~~Disabled person~~ Person with a disability means a person who:

24 a. Is unable to engage in any substantial gainful activity by reason of any physical
25 or mental impairment which can be determined within a reasonable degree of
26 medical certainty; and

27 b. Comes within the limitations of section 53-497(a); and

c. Regardless of age, was so disabled during the entire taxable year to a degree sufficient to qualify for the payment of full benefits under any bona fide plan of a public or private organization based solely upon such disability.

(2) *Dwelling unit* means an owner-occupied dwelling place, including a condominium unit. The term also means a leased dwelling place, including an apartment unit and a leased mobile home trailer space; but it does not include nursing homes which are required to be licensed under the general laws of the state. The term "mobile home" shall have the meaning given by general law in the statutes of the state.

(3) *Owner* means possessed of legal incidents of ownership of record in the office of the clerk and recorder.

Section 3. Section 53-493 of the Denver Revised Municipal Code is hereby amended by deleting the language stricken and adding the language underlined below, to read as follows:

Sec. 53-493. - Administration by ~~manager~~ executive director of human services.

The administration of this article is hereby vested in the ~~manager~~ executive director of human services who shall prescribe application forms and may make reasonable rules and regulations in conformity with this article for the proper administration of the same. The executive director may delegate the administration of this article, or any part thereof, subject to the limitations of the Charter and this Code, to duly qualified deputies and employees of the department of human services.

Section 4. Section 53-494 of the Denver Revised Municipal Code is hereby amended by deleting the language stricken and adding the language underlined below, to read as follows:

Sec. 53-494. - Applications for payment.

Applications for payment under this article can only be filed with the ~~manager~~ executive director of human services in the following manner:

(1) An adult applicant who is the owner of a dwelling unit situated within the ~~City of Denver~~ city, in which such applicant resides, or the legal representative of such applicant, shall file an application only after having fully paid all ad valorem taxes levied and assessed

by the city in the calendar year previous to that in which application is made and for all previous years in which such taxes were levied and assessed. All such applications must be filed between the first day of May and the last day of December in the succeeding calendar year to that in which such taxes were levied and assessed (example: 2016 applications must be received between May 1, 2017, and December 31, 2017); and

(2) An adult applicant who is the lessee of a dwelling unit situated within the ~~City of Denver~~ city, in which such applicant resides, or the legal representative of such applicant, shall file an application between the first day of May and the last day of December in the calendar year succeeding the year in which the total rental payable by such applicant shall have been fully paid (example: 2016 applications must be received between May 1, 2017, and December 31, 2017).

(3) Applications submitted from January 1, 2019, until April 30, 2019, only. An adult applicant, who is a resident and the owner or a lessee of a dwelling unit situated in the city, may file an application for payments under this article from January 1, 2019, until April 30, 2019. The executive director, or a designee, may approve an application from an eligible applicant for payment, in whole or in part, contingent upon the availability of funds.

Section 5. Section 53-495 of the Denver Revised Municipal Code is hereby amended by deleting the language stricken and adding the language underlined below, to read as follows:

Sec. 53-495. - Attestation of application forms.

The application forms prescribed by the ~~manager~~ executive director of human services under this article shall be attested by the applicant, or, if incompetent ~~or deceased~~, by the legal representative of such person, under the penalty of perjury.

Section 6. Section 53-496 of the Denver Revised Municipal Code is hereby amended by deleting the language stricken and adding the language underlined below, to read as follows:

Sec. 53-496. - Payment from ~~unapportioned payments elderly persons fund~~ for low-income older adults or persons with disabilities.

1 The ~~manager~~ executive director of human services or a designee, after examination of
2 applications filed with the ~~manager~~ executive director for payments under this article, shall find and
3 determine the eligibility of persons applying for payment under this article and the amount of
4 payment, if any, to which such person is entitled, and shall pay to such person or, if incompetent or
5 deceased, to the legal representative of such person such payment from the funds appropriated to
6 the ~~unapportioned payments to elderly persons~~ fund for low-income older adults or persons with
7 disabilities fund, and no other, without delay.

8 **Section 7.** Section 53-497 of the Denver Revised Municipal Code is hereby amended by
9 deleting the language stricken and adding the language underlined below, to read as follows:

10 **Sec. 53-497. - Payment to eligible persons.**

11 (a) A person is eligible for payment under this article who:

12 (1) Is a person who was disabled the entire year, or turned sixty-five (65) years of
13 age or older during the calendar year preceding the year in which application
14 for payment is made (example: for a 2016 application, the person was disabled
15 for all of 2016 or turned sixty-five (65) in 2016); and

16 (2) Had income, during the calendar year preceding the year for which application
17 is made, at or below the threshold determined by the ~~manager~~ executive director
18 of human services and documented on the application. For 2016 applications
19 (received in 2017) 2016 income of fifteen thousand nine hundred dollars
20 (\$15,900.00) or less is required for single applicants; 2016 of twenty-three
21 thousand one hundred dollars (\$23,100.00) or less is required of ~~husband and~~
22 ~~wife~~ married applicants. The income eligibility limitations set forth in this
23 paragraph (a)(2) shall be directly and proportionately adjusted by the
24 percentage equal to the cost of living adjustment approved by the federal Social
25 Security Administration for Social Security recipients under Section 230, Title 2,
26 of the Social Security Act, as amended, for each calendar year. Income from all
27 sources for purposes of determining eligibility for payment under this article
28 includes, but is not limited to, income such as alimony, child support or
29 maintenance money; cash public assistance or relief (including TANF); pension

1 endowment or annuity benefits; federal Social Security benefits; veterans'
2 benefits; taxable and nontaxable interest; dividends; worker's compensation or
3 occupational disease compensation; and unemployment compensation
4 benefits; but such income shall not include outright gifts; and

5 (3) Has resided in a dwelling unit situated within the city during the entire calendar
6 year preceding the year for which application for payment is made, and which
7 dwelling unit is subject to ad valorem taxes levied and assessed by the city or
8 for which a payment-in-lieu-of ad valorem taxes has been made by the Denver
9 Housing Authority pursuant to Subsection 1437d(d) of Title 42 of the United
10 States Code; and

11 (4) Has, if the owner of such dwelling unit, paid all ad valorem taxes levied and
12 assessed by the city against the dwelling unit which became due and payable
13 in the year in which application for payment is made, in the manner and within
14 the time provided for by statute, or, if the lessee of such dwelling unit, fully paid
15 rent to the owner of such dwelling unit for the entire calendar year preceding the
16 year for which application is made, and providing that such leased dwelling unit
17 is subject to and not exempt from ad valorem taxation by the city or subject to a
18 payment-in-lieu-of ad valorem taxes as set forth in paragraph (3) of this
19 subsection.

20 (b) The ~~manager~~ executive director of human services shall pay to a person eligible for
21 payment under this article, or the legal representative of such person if such person
22 eligible for payment is incompetent ~~or deceased~~, provided application therefor is filed
23 with the ~~manager~~ executive director as hereinafter required, the amount determined
24 by and under the provisions of section 53-498. ~~Husband and wife~~ A married couple
25 shall be treated for payment purposes as one (1) person under this article. An individual
26 who is both a ~~disabled person~~ person with a disability and a person sixty-five (65) years
27 of age or older shall be eligible for only one (1) payment under this article.

1 **Section 8.** Section 53-498 of the Denver Revised Municipal Code is hereby amended by
2 deleting the language stricken and adding the language underlined below, to read as follows:

3 **Sec. 53-498. - Computation of payment.**

4 The ~~manager~~ executive director of human services or a designee shall compute the total
5 payments due to eligible persons or other applicants meeting all of the requirements set forth in
6 subsection 53-497(a) as follows:

- 7 (1) For applications associated with a dwelling unit owned or rented by an applicant in
8 2012 and subsequent years, an initial amount of at least three hundred and seventy-
9 two dollars (\$372.00) to each applicant who establishes eligibility as provided in this
10 article; and
- 11 (2) An additional one dollar (\$1.00) of payment for every one-hundred-dollar decrement in
12 the applicant's income from the annual income limitations defined in paragraph (a)(2)
13 of section 53-497 of the Revised Municipal Code, down to seventy-five (75) percent of
14 the income limitations; and
- 15 (3) An additional two dollars (\$2.00) of payment for every one-hundred-dollar decrement
16 in the applicant's income beneath seventy-five (75) percent of the income limitations.

17 **Section 9.** Section 53-499 of the Denver Revised Municipal Code is hereby amended by
18 deleting the language stricken and adding the language underlined below, to read as follows:

19 **Sec. 53-499. - False statements.**

20 It shall be a violation of this article for any applicant, or for any legal representative of an
21 incompetent or ~~deceased~~ eligible person submitting an application for payment hereunder to make
22 any false statements in the application for payment under this article. The application forms
23 prescribed by the executive director of human services under this article shall be attested by the
24 applicant, or, the legal representative of an incompetent person, under the penalty of perjury.

25 **Section 10.** Effective May 1, 2019, this Article XI of Chapter 53 is repealed in its entirety and
26 is reenacted to read as follows:

1 **ARTICLE XI. – REAL PROPERTY TAX ASSISTANCE TO ELIGIBLE LOW-INCOME PROPERTY**
2 **OWNERS OR TENANTS**

3 **Sec. 53-491. - Legislative intent.**

4 The city council determines and declares that low-income owner-occupants of residences in
5 the city who are older adults, individuals with disabilities, or homeowners with dependent children
6 are unduly burdened by the impact of low incomes and property taxes. The council also determines
7 and declares that low-income tenant or renter-occupants of residences in the city who are older
8 adults or individuals with disabilities are also impacted by property taxes because portions of their
9 rent goes to pay real property taxes on their residence in the city. The council further finds that this
10 economic burden is compounded by rising costs of living and increasing tax burdens. Therefore,
11 the council believes that the adoption of this article is in the public interest and the real property tax
12 assistance provisions contained herein are reasonable, proper, and necessary to allow eligible low-
13 income owners or tenants to remain in peaceful possession of their residences.

14 **Sec. 53-492. - Definitions.**

15 The following words and phrases shall have the meanings given them in this section, unless
16 the context clearly requires a different meaning.

- 17 (a) *Application* means a verified request from an applicant on a department approved
18 form for assistance payments under this article, which can include electronic forms,
19 that includes a statement the information on the application is accurate and truthful
20 under penalty of perjury.
- 21 (b) *Applicant* means the individual property owner occupant or tenant occupant of a
22 dwelling unit submitting an application or the legal representative of an eligible
23 property owner or tenant if that person is incompetent.
- 24 (c) *Assistance payment* means a payment of money from the city to an applicant upon
25 approval of the applicant's application.
- 26 (d) *Assistance payment fund* means the fund account established by the city containing
27 appropriated funds.

- (e) *Denver Area Median Income* means the median income of the city in which the dwelling unit is located in relation to family size, as published annually by the United States Department of Housing and Urban Development.
- (f) *Department* means the city's department of human services.
- (g) *Dwelling unit* means an owner or tenant occupied residential dwelling located on real property situated within the city. Dwelling unit includes, without limitation, a single-family residence, a condominium unit, an apartment unit, a mobile home, or other owned or leased dwelling place. Dwelling unit does not include nursing homes which are required to be licensed under the general laws of the state. The term "mobile home" shall have the meaning given by general law in the statutes of the state.
- (h) *Executive director* means the executive director of the department or the executive director's designee.
- (i) *Older adult* means an individual who is sixty-five (65) years of age or older.
- (j) *Owner* means a natural person who is a taxpayer by reason of ownership of taxable residential real property that contains a dwelling unit as shown by the records filed in or maintained by the city assessor or the office of the clerk and recorder.
- (k) *Person with a disability* means a person who:
- (1) Is unable to engage in any substantial gainful activity by reason of any physical or mental impairment which can be determined within a reasonable degree of medical certainty; and
 - (2) Comes within the limitations of section 53-495(a); and
 - (3) Regardless of age, was so disabled during the entire taxable year to a degree sufficient to qualify for the payment of full benefits under any bona fide plan of a public or private organization based solely upon such disability.
- (l) *Taxable residential real property* means all residential real property containing a dwelling unit not expressly exempted from taxation by law.

1 (m) *Taxpayer* means a natural person who is obligated to pay and has paid all applicable
2 taxes levied and assessed by law for taxable residential real property located in the
3 city.

4 (n) *Tenant or lessee* means a natural person who paid rent for the exclusive right to
5 occupy a dwelling unit as part of a bona fide tenancy or lease agreement with the
6 owner or owner's authorized agent.
7

8 **Sec. 53-493. - Administration by executive director of human services.**

9 The administration of this article is hereby vested in the executive director who shall
10 prescribe application forms and shall have the power and authority to adopt rules and
11 regulations and internal guidelines in conformity with this article for the proper administration and
12 enforcement of the same. The executive director may delegate the administration of this article,
13 or any part thereof, subject to the limitations of the Charter and this Code, to duly qualified
14 deputies and employees of the department of human services.

15 **Sec. 53-494. - Applications for assistance payment – application cycle.**

16 Applications for assistance payment under this article may only be filed with the executive
17 director of human services during the following timeframes:

18 (a) *Application cycle.* The application cycle for assistance payments under this article will
19 be from May 1 until April 30 of the following year (example: applications for assistance
20 payments may be submitted from May 1, 2019, until April 30, 2020.) For every
21 application cycle, applications may not be submitted prior to May 1 or later than April
22 30 of the following year.

23 (b) *Applications received and approved before May 1, 2019.* Funding decisions for
24 applications received and approved by the executive director before May 1, 2019, will
25 remain in effect in accordance with the terms and conditions for such payments as
26 provided by the executive director.

27 **Sec. 53-495. – Eligibility for assistance payments.**

28 (a) *Filing status.*

- (1) *Married couple.* A married couple will be deemed to be a single applicant. Spouses will be treated as jointly qualifying for assistance payment under this article if either spouse meets the age requirement and they jointly meet all the limitations in this section 53-495, as applicable.
- (2) *Rules for other filing status situations.* The executive director may adopt rules and regulations with respect to other filing status situations concerning married couples including without limitation divorce or legal separation or death of a spouse.
- (b) *Only one application if applicant meets more than one eligibility criteria.* An applicant who meets more than one criteria for eligibility must submit a single application for a single claim for payment (example: an older adult who is also a person with a disability may submit only one application per application cycle and shall be eligible for only one payment.)
- (c) *Only one application and only one payment per applicant's taxable residential property.* The executive director shall only authorize payment based on a single application for only one taxable residential property. A single taxable residential property shall not be used to authorize more than one payment per application cycle under this article.
- (d) *Owners.* An applicant who is an owner of a dwelling unit is eligible for assistance payments under this article if the applicant, as of the date of the application:
- (1) Is eighteen (18) years of age or older;
 - (2) Resided in the dwelling unit for the entire calendar year preceding the year in which application for payment is made (example: for an application submitted during the 2018-2019 application cycle, the applicant resided in the dwelling unit for the entire calendar year of 2017);
 - (3) Currently resides in the dwelling unit;
 - (4) Fully paid, directly or through mortgage payments, all prior years' real property taxes for the dwelling unit; and
 - (5) Meets any of the following requirements:

- a. had an income equal to or less than thirty-five percent (35%) of the Denver Area Median Income for the calendar year preceding the first day of the application cycle and a disability for the year preceding the year in which application for assistance is made (example: for an application submitted during the 2019-2020 application cycle, the applicant was a person with a disability, as defined in section 53-492(k), for the entire calendar year of 2018);
 - b. had an income equal to or less than thirty-five percent (35%) of the Denver Area Median Income for the calendar year preceding the first day of the application cycle and was sixty-five (65) years of age or older during the calendar year preceding the year in which application for assistance is made (example: for an application submitted during the 2019-2020 application cycle, the applicant was an older adult during the entire calendar year of 2018); or
 - c. had an income equal to or less than forty (40%) of the Denver Area Median Income for the calendar year preceding the first day of the application cycle and resided with a dependent minor child in the dwelling unit for the calendar year preceding the year in which application for assistance is made (example: for an application submitted during the 2019-2020 application cycle, the dependent minor child resided with the owner applicant in the dwelling unit for the entire calendar year of 2018).
- (e) *Tenants or lessees.* An applicant who is a tenant or lessee of a dwelling unit is eligible for assistance payments under this article if the applicant, as of the date of the application:
- (1) Is eighteen (18) years of age or older;
 - (2) Resided in a dwelling unit:
 - a. for the entire year preceding the year in which application for payment is made (example: for an application submitted during the 2019-2020 application cycle, the applicant resided in the dwelling unit for the entire calendar year of 2018); and

1 b. for which ad valorem taxes were actually paid in full to the city on the
2 dwelling unit during the calendar year preceding the year in which the
3 application for payment is made or, if the dwelling unit was owned by the
4 Denver Housing Authority, a payment-in-lieu-of ad valorem taxes was
5 made to the city by the Denver Housing Authority pursuant to Subsection
6 1437d(d) of Title 42 of the United States Code;

7 (3) Currently resides in the dwelling unit;

8 (4) Fully paid all rent, fees, and charges owed to the owner or owner's authorized
9 agent for the tenant's or lessee's use and occupancy of the dwelling unit; and

10 (5) Had income during the calendar year preceding the year for which application
11 is made at or below the threshold determined by the executive director by rules
12 and regulations and documented on the application. For Applications submitted
13 during the 2019-2020 application cycle, applicants who are single must have a
14 2018 income of sixteen thousand two hundred dollars (\$16,200.00) or less and
15 applicants who are married must have a 2018 income of twenty-three thousand
16 seven hundred dollars (\$23,700.00) or less. The income eligibility limitations
17 set forth in this subsection 53-495(c)(3) shall be directly and proportionately
18 adjusted each year by the percentage equal to the cost of living adjustment
19 approved by the federal Social Security Administration for social security
20 recipients under Section 230, Title 2, of the Social Security Act, as amended,
21 for each calendar year, and was either:

- 22 a. a person with a disability for the year preceding the year in which
23 application for assistance is made (example: for an application submitted
24 during the 2019-2020 application cycle, the applicant was a person with a
25 disability, as defined in section 53-492(k), for the entire calendar year of
26 2018); or
27 b. sixty-five (65) years of age or older during the calendar year preceding the
28 year in which application for assistance is made (example: for an
29 application submitted during the 2019-2020 application cycle, the
30 applicant was an older adult during the entire calendar year of 2018).

1 **Sec. 53-496. - Payment from real property tax assistance payments fund.**

2 (a) *Review and determination of eligibility.* The executive director shall review each
3 application and make a determination of eligibility based on the limitations set forth in
4 section 53-495. The review may include without limitation verification of the accuracy
5 of the statements and information contained in audited applications. Upon a
6 determination of eligibility, the executive director will determine the amount of the
7 assistance payment that may be authorized in accordance with section 53-497. The
8 executive director may adopt rules and regulations defining household composition
9 and countable income as well as establishing methods and procedures for the review
10 and verification of applications and determination of eligibility.

11 (b) *Appropriated funds required.* Authorized assistance payments under this article will
12 be made from funds appropriated to the real property tax assistance payments fund,
13 and no other. If the assistance payment fund lacks sufficient funds to make payments
14 to approved applicants, payment for those approved applications and the review of
15 pending applications will be suspended until such time that the fund balance contains
16 sufficient appropriated funds to make payments under this article.

17 (c) *Audits.* The executive director is authorized and shall, from time to time, audit the
18 applications which may include without limitation verification of the accuracy of the
19 statements and information contained in audited applications. The executive director
20 may adopt rules and regulations establishing audit methods and procedures.

21 **Sec. 53-497. - Computation and authorization of payment.**

22 The executive director shall, by rules and regulations, establish limitations on the amount of
23 payment for an approved application as follows:

24 (a) *Initial base amount.* For applications approved on or after May 1, 2019, the initial
25 base amount will be equal to three hundred seventy-two dollars (\$372.00) or the
26 amended amount established by the executive director in rules and regulations.

27 (b) *Adjustment to base amount; Maximum payment amount.* The initial base amount may
28 be increased in proportion to the percentage difference between the applicant's
29 reported income and the income limits set forth in section 53-495(b)(5)(a),(b), or (c),

as applicable for applicant owners, or in section 53-495(c)(5) for applicant tenants.
Once computed, the adjusted amount will then be rounded to the nearest whole dollar.

(c) *Maximum payment amount.* The executive director will establish the maximum payment amount by rules and regulations.

(d) *Restrictions.* For applicants who are owners, the total amount of payment authorized under this section per application cycle shall not exceed the amount of ad valorem taxes actually paid on the applicant's dwelling unit. For applicants who are tenants or lessees, the total amount of payment authorized under this section per application cycle shall not exceed the total amount of rent actually paid by the applicant.

(e) *Authorization for payment.* Upon making a final determination of the amount of the assistance payment, the executive director shall authorize the payment be made from the assistance payment fund, and no other, without delay subject to the availability of appropriated funds.

Sec. 53-498. - False statements.

It shall be a violation of this article for any applicant, or for any legal representative of an incompetent individual eligible for payment to make any false statements in the application for payment under this article.

Sec. 53-499. - Records; Confidentiality.

Except in accordance with judicial order or as otherwise provided by law, the executive director, and those working under the executive director's supervision, shall not divulge any information disclosed in an application or in its supporting documentation. Notwithstanding anything to the contrary, any authorized agent of the city, including the city auditor or the auditor's representative, has the right to access and the right to examine any pertinent records collected under this program. Applications and supporting documentation shall be preserved for three (3) years and thereafter until the executive director orders them destroyed.

Sec. 53-500. – Severability.

If any part, term, or provision of this article is held by a court of competent jurisdiction to be illegal or in conflict with any law of the State of Colorado, the validity of the remaining portions or provisions shall not be affected, and the rights, obligations and enforcement of this article shall

1 be continued in full force and effect as if the article did not contain the particular part, term, or
2 provision held to be invalid.

3 **Sec. 53-501—53-510. - Reserved.**

4 **Section 11.** Effective May 1, 2019, Section 20-26(e) of the Denver Revised Municipal Code
5 is hereby amended by deleting the language stricken and adding the language underlined below, to
6 read as follows:

7 (e) *Use of restored property tax revenues.* Restored property tax revenues shall be
8 expended exclusively for the following purposes, with the allocation of revenue
9 between and among these purposes to be determined on a year to year basis as a
10 part of the annual budget and appropriation process: public safety, services for
11 children, street maintenance, parks and recreation, libraries, and other essential
12 city services; payments to low-income ~~elderly and disabled persons~~ residents who
13 are older adults, individuals with disabilities, or homeowners with dependent
14 children as provided in ~~section 53-498~~ section 53-495; and business incentive
15 programs to retain and attract businesses to Denver.

16 **REMAINDER OF PAGE INTENTIONALLY BLANK**

1 COMMITTEE APPROVAL DATE: December 19, 2018
2 MAYOR-COUNCIL DATE: _____, 2018
3 PASSED BY THE COUNCIL: _____
4 _____ - PRESIDENT
5 APPROVED: _____ - MAYOR _____
6 ATTEST: _____ - CLERK AND RECORDER,
7 EX-OFFICIO CLERK OF THE
8 CITY AND COUNTY OF DENVER
9 NOTICE PUBLISHED IN THE DAILY JOURNAL: _____;
10 PREPARED BY: Victoria J. Ortega, Assistant City Attorney DATE: _____, 2018
11 Pursuant to section 13-12, D.R.M.C., this proposed ordinance has been reviewed by the office of the
12 City Attorney. We find no irregularity as to form, and have no legal objection to the proposed
13 ordinance. The proposed ordinance is not submitted to the City Council for approval pursuant to §
14 3.2.6 of the Charter.
15
16 Kristin M. Bronson, Denver City Attorney
17
18 BY: _____, Assistant City Attorney DATE: _____
19