

ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

Benedict Y. Hur Chairperson	Date:	March 20, 2013		
JAMIENNE S. STUDLEY	To:	Members, Ethics Commission		
VICE-CHAIRPERSON BEVERLY HAYON COMMISSIONER	From:	John St. Croix, Executive Director By: Steven Massey, Information Technology Officer		
DOROTHY S. LIU COMMISSIONER	Re:	Regulation re CFRO Section 1.112		
PAUL A. RENNE COMMISSIONER		Introduction		
JOHN ST. CROIX Executive Director				
	 A San Francisco committee is required to file electronic statements if th committee receives contributions or makes expenditures that total \$1,00 more in a calendar year; any committee not required to file electronic statements may voluntarily file electronic statements; and any committee that files electronic statements is not required to file pape versions. 			
	for filers to si	aw, the Commission's electronic filing system must include a procedure gn statements and reports under penalty of perjury. The proposed ould clarify how committee officers would sign electronic documents.		
	to carrying ou regulations by become effect this 60-day pe (8/11) vote. S	sion may adopt, amend and rescind regulations consistent with and related at the purposes and provisions of the CFRO. The Commission may adopt y a majority (3/5) vote. A regulation adopted by the Commission shall tive 60 days after the date of its adoption unless before the expiration of eriod, the Board of Supervisors vetoes the regulation by a two-thirds <i>See</i> S.F. Charter § 15.102. Staff anticipates implementing the new ng requirements starting with the July 31, 2013 semi-annual filing		

Discussion and Proposed Regulation

Government Code section 81004(A) requires:

All reports and statements filed under this title shall be signed under penalty of perjury and verified by the filer. The verification shall state that the filer has used all reasonable diligence in its preparation, and that to the best of his knowledge it is true and complete.

The Secretary of State has not authorized committees that file statements with the state to file electronically, so the state has not developed an electronic signature procedure for campaign finance statements. Only local agencies that pass an ordinance in compliance with the requirements in AB 2452 are permitted to accept electronic statements in lieu of paper reports.

Staff has discussed possible methods of complying with the signature requirement with other cities. In January, the City of San Diego was the first city to implement a version of the discussed procedure. There, filers complete a Signature Verification Card that is signed in hard copy and transmitted to the agency's electronic filing system vendor via fax. The Signature Verification Card requires the signer to agree that all documents filed electronically in the electronic filing system will be signed under penalty of perjury. Upon receipt of a Signature Verification Card, the City provides the signer with a signer ID number, used as the electronic signature, and a PIN code that the filer will use to verify the signature's authenticity. The signer may use the signer ID number on any electronic statement filed in the electronic filing system. Staff proposes adopting the Signature Verification Card procedure, but adding a further level of security to the requirement to verify the signer's identity.

To establish a committee, a candidate must file a Candidate Intention Statement (FPPC Form 501) and committee officers must file a Statement of Organization (FPPC Form 410). Currently, these forms are signed and filed in hard copy. However, staff believes it will be able to accommodate accepting these forms in electronic format in the near future. Once these forms are filed electronically, an individual would be able to establish a committee and an electronic filing account, and file all frequently filed FPPC forms electronically without ever verifying the authenticity of his or her identity.

To ensure the authenticity of the filer's signature card, and in anticipation of Forms 501 and 410 becoming electronic forms, staff proposes that instead of requiring the Signature Verification Card to be faxed to the Commission's electronic filing system vendor, the Commission require that the card be signed either in the presence of Ethics Commission staff or acknowledged by a notary public and delivered to the Commission. Filers would be required to present valid photo identification when signing the Signature Verification Card. This added step would guarantee that the signer's identity is authentic and that the signer ID and PIN code are provided to the appropriate signer. The Signature Verification Card (proposed Ethics Form SFEC-112a) would only need to be completed once to verify the signer's identity, so attorneys and professionals who frequently serve as treasurer for multiple committees and candidates who run for office in multiple elections would use the same signer ID and PIN code for all documents filed with the Commission. The Commission would store the original copies of the Signature Verification Cards in the Commission's office.

Draft Regulation 1.112-2(a) would provide that in order to submit an electronically signed campaign disclosure statement, the signer must have first filed a Form SFEC-112a with the Commission, consistent with the process described above. The Commission would issue a signer ID and PIN code to a signer who completes a valid form SFEC-112a. A signer who receives a PIN code would be responsible for all documents signed using that PIN code.

Draft Regulation 1.112-2(b) would set forth the steps for a person who voluntarily opts to file electronically. Form SFEC-112b includes a checkbox to confirm that the committee intends to file electronic statements in lieu of paper statements.

Draft Regulation 1.112-2(c) states that a campaign statement that lacks the electronic signatures of all required signers on the statement is not deemed filed.

Proposed Regulation 1.112-2: Electronic Campaign Disclosure - Signature Verification.

a) Signature Verification Cards

1) In order to submit an electronically-signed campaign finance disclosure statement, the person signing the disclosure statement must have filed a Form SFEC-112a with the Ethics Commission to verify his or her signature.

2) The Form SFEC-112a must be signed in the presence of staff of the Ethics Commission during the Commission's regular business hours, or delivered to the Commission with an original signature notarized by a notary public.

3) Any individual who signs Form SFEC-112a in the presence of Ethics Commission staff must present valid photo identification issued by a governmental agency, such as a San Francisco City ID, a California ID or driver's license, or a passport.

4) The Ethics Commission shall issue a Signer ID and PIN Code to any person who presents a validly completed Form SFEC-112a.

5) The person who receives the PIN Code is responsible for all documents signed using the PIN Code.

Example: A candidate receives a Signer ID and PIN Code from the Ethics Commission. The candidate discloses the PIN Code to the treasurer who uses it to sign and file the candidate committee's campaign disclosure forms. The candidate is still responsible for the contents of the campaign disclosure form that is filed with the Ethics Commission.

b) Voluntary Electronic Filing

Any person who voluntarily opts to file electronic statements under Section 1.112(c) must first file Form SFEC-112b with the Ethics Commission. Thereafter, the person shall be subject to all requirements set forth in Section 1.112 and the regulations thereunder.

c) Any campaign finance disclosure statement that must be filed electronically and that lacks all electronic signatures of the required signers is not deemed filed and may subject the responsible parties to late filing fees, in addition to any other penalty under the Code.

Decision Point

Shall the Commission approve the proposed regulation as set forth above?

Attached are a draft of form SFEC-112a, form SFEC-112b and a memorandum that will be sent to all filers to inform them of the new electronic filing requirements.

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SEC. 1.112. ELECTRONIC CAMPAIGN DISCLOSURE. (a) FILING ELECTRONIC CAMPAIGN STATEMENTS.

(1) Filing Electronic Copies of Campaign Statements Required by State Law. Whenever any committee that meets the requirements of Subsection (b) of this Section is required by the California Political Reform Act, California Government Code Section 81000 et seq., to file a campaign disclosure statement or report with the Ethics Commission, the committee shall file the statement or report in an electronic format with the Ethics Commission, provided the Ethics Commission has prescribed the format at least 60 days before the statement or report is due to be filed.

(2) Filing Electronic Copies of Campaign Statements Required by Local Law. Whenever any committee is required to file a campaign disclosure statement or report with the Ethics Commission under this Chapter, the committee shall file the statement or report in an electronic format, provided the Ethics Commission has prescribed the format at least 60 days before the statement or report is due to be filed.

(3) Continuous Filing of Electronic Statements. Once a committee is subject to the electronic filing requirements imposed by this Section, the committee shall remain subject to the electronic filing requirements, regardless of the amount of contributions received or expenditures made during each reporting period, until the committee terminates pursuant to this Chapter and the California Political Reform Act, California Government Code Section 81000 et seq.

(4) Disclosure of Expenditure Dates. All electronic statements filed under this Section shall include the date any expenditure required to be reported on the statement was incurred, provided that the Ethics Commission's forms accommodate the reporting of such dates.

(b) COMMITTEES SUBJECT TO ELECTRONIC FILING REQUIREMENTS.

(1) A committee must file electronic copies of statements and reports if it receives contributions or makes expenditures that total \$1,000 or more in a calendar year and is:

(A) a committee controlled by a candidate for City elective office;

(B) a committee primarily formed to support or oppose a local measure or a candidate for City elective office; or

(C) a general purpose recipient, independent expenditure or major donor committee that qualifies, under state law, as a county general purpose committee in the City and County of San Francisco; or

(D) a committee primarily formed to support or oppose a person seeking membership on a San Francisco county central committee, including a committee controlled by the person seeking membership on a San Francisco county central committee.

(2) The Ethics Commission may require additional committees not listed in this Section to file electronically through regulations adopted at least 60 days before the statement or report is due to be filed.

(c) VOLUNTARY ELECTRONIC FILING. Any committee not required to file electronic statements by this Section may voluntarily opt to file electronic statements by submitting written notice to the Ethics Commission. A committee that opts to file electronic statements shall be subject to the requirements of this Section.

(Added by Proposition O, 11/7/2000; amended by Ord. 008-13, File No. 120817, App. 2/4/2013; amended by Ord. 3-06, File No. 051439, App. 1/20/2006; Ord. 228-06, File No. 060501, App. 9/14/2006; Ord. 234-09; File No. 090989, App. 11/10/2009) (Former Sec. 1.112 was added by Ord. 114-76, App. 4/2/76; amended by Ord. 386-95, App. 12/14/95; renumbered by Ord. 71-00, File No. 000358, App. 4/28/2000; renumbered by Proposition O, 11/7/2000)



ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

BENEDICT Y. HUR CHAIRPERSON

DATE

JAMIENNE S. STUDLEY VICE-CHAIRPERSON

> BEVERLY HAYON COMMISSIONER

DOROTHY S. LIU COMMISSIONER

PAUL A. RENNE COMMISSIONER

JOHN ST. CROIX EXECUTIVE DIRECTOR Treasurer Committee Name [ID#] Address

City, CA Zip

Dear Treasurer/Candidate:

Re: Changes to Electronic Filing Requirements

<u>Please read this notice carefully because the changes discussed impact</u> <u>all filers of campaign finance statements with the Ethics Commission.</u>

This letter provides notice of changes to electronic filing requirements, pursuant to section 1.112(a)(1) of the San Francisco Campaign and Governmental Conduct Code. Recent changes to the Political Reform Act, Campaign Finance Reform Ordinance, and Ethics Commission regulations require committees to adhere to the following changes:

1) A committee must file electronic statements and reports if it receives contributions or makes expenditures that total <u>\$1,000</u> or more in a calendar year. Therefore, all San Francisco committees that file Form 410 to establish a committee and all Form 461 filers should register for an electronic filing account with the Ethics Commission. All committee officers should register for a Netfile User Account and complete a Signature Verification Card (Form SFEC-112a);

2) A committee primarily formed to support or oppose a person seeking membership on a San Francisco county central committee, including a committee controlled by the person seeking membership on a San Francisco county central committee, must file electronic statements if the committee reaches the \$1,000 electronic filing threshold. Therefore, such committees should complete a Committee Account Registration Form (Form SFEC-112b) to register for an electronic filing account with the Ethics Commission. All committee officers should register for a Netfile User Account and complete a Signature Verification Card (Form SFEC-112a);

3) Any committee not required to file electronic statements may voluntarily opt to file electronic statements by submitting written notice to the Ethics Commission. This includes any committee that is required to file an original statement with the Secretary of State and a copy of the statement with the Ethics Commission. Written notice is provided by completing a Committee Account Registration Form (Form SFEC-112b). A committee that volunteers to file electronic statements is subject to the electronic filing requirements, regardless of the amount

of contributions received or expenditures made during each reporting period, until the committee terminates; and

4) Any committee that files electronic statements and completes the electronic signature requirements detailed below is no longer required to file paper versions of the statements that are electronically filed.

Electronic Signatures

All individuals required to sign electronic campaign finance statements are required to complete a Signature Verification Card (Form SFEC-112a) to authenticate the identity of the signer. The Signature Verification Card (Form SFEC-112a) is a paper form that is signed by the individual and stored at the Ethics Commission. Upon receipt of the Signature Verification Card (Form SFEC-112a), the Ethics Commission will provide the individual with an electronic signature ID number and PIN code that will be used to sign documents. The electronic signature ID number will serve as the individual's electronic signature for any electronic statement filed with the Ethics Commission. Individuals who do not have a Signature Verification Card (Form SFEC-112a) on file will not be able to sign electronic statements. Individuals required to sign electronic documents will need to complete the Signature Verification Card (Form SFEC-112a) only once. Signature Verification Cards (Form SFEC-112a) must either be signed in the presence of Ethics Commission staff or acknowledged by a notary public and delivered to the Commission office. Individuals signing a Form SFEC-112a must show a government issued identification card that shows their picture and name.

Not all individuals need to establish a Signature Verification Card (Form SFEC-112a). Only statements that require a signature must have a Signature Verification Card (Form SFEC-112a) on file. Statements requiring a signature at this time include Fair Political Practices Commission (FPPC) forms: 450, 460, 461, and 465. Additional forms that require electronic signatures may be required to be filed in electronic format in the future. In addition, for committees that do not reach the \$1,000 threshold and voluntarily e-file, a Signature Verification Card (Form SFEC-112a) is required for FPPC form 470. FPPC Forms 496 and 497 do not require a signature, thus individuals filing these statements **do not** need to complete a Signature Verification Card (Form SFEC-112a) within 24 hours of making a late contribution or independent expenditure. However, these individuals will require a Signature Verification Card (Form SFEC-112a) within 24 hours of making a late contribution Card (Form SFEC-112a) when the transactions are reported on FPPC Form 460 or 461.

The Ethics Commission will begin requiring Signature Verification Cards (Form SFEC-112a) for all individuals signing electronic campaign finance statements as of the semi-annual campaign finance statement <u>due July 31, 2013</u>. Individuals required to sign electronic statements should complete the Signature Verification Card (Form SFEC-112a) early. A committee with a completed semi-annual statement that is ready to be filed but lacking a Signature Verification Card (Form SFEC-112a) on file for one of the required signers will be unable to submit the statement, which can lead to the late filing of statements and a fine of \$25 per day for each day the statement is late. It is each signer's responsibility to comply with the electronic signature requirements. Again, a committee that completes its disclosure statements but that also lacks the required electronic signature ID will not be able to file the disclosure statement.

Signers must never disclose the PIN code to anyone, including other campaign staff, because the PIN code will be used to verify that the individual has signed the statement. If the PIN code is ever compromised, it is the responsibility of the signer to notify immediately the Ethics Commission and to reset the PIN code using the Netfile User Account.

Committees must complete three steps to file electronic statements with the Ethics Commission:

1) All signers must create a "Netfile User Account" or have an existing account from a previous committee. The "Netfile User Account" is an individual specific account that can be used to access multiple committee accounts for which the individual is responsible;

2) All signers must complete "Signature Verification Card (Form SFEC-112a)" or have a "Signature Verification Card (Form SFEC-112a)" already on file from a previous committee; and

3) An authorized committee officer must complete a "Committee Account Registration Form (Form SFEC-112b)" to establish an electronic filing account for the committee. The committee account is used to file electronic statements and may be controlled by multiple committee officers with "Netfile User Accounts."

Attached to this notice are instructions that detail the exact steps each committee must take to sign and file electronic statements with the Ethics Commission. Because some steps require review by Ethics Commission staff, we advise you to complete these steps as soon as possible.

If you have questions, please contact the Ethics Commission at (415) 252-3100.

Sincerely,

John St. Croix Executive Director

CC: Candidates/Committees

Instructions

How to Register for On-line Accounts to File Using the Free Electronic Filing System or Third-Party Vendor Software

<u>1. Create a Netfile User Account</u>

If you have never used the electronic filing system before, or you previously used third-party vendor software to file campaign statements and did not register for a Netfile User Account, you will need to register for a Netfile User Account. The Netfile User Account will be your on-line identity that can access all committee accounts for which you are responsible. You will need a Netfile User Account if you either sign electronic statements or you enter information into the FPPC forms. If you already have a Netfile User Account, skip this step.

Complete the following steps to create a Netfile User Account:

1) Go to the Ethics Commission's web site at <u>http://www.sfethics.org</u> and click to register for campaign finance electronic filing under the heading "E-File Statements";

2) Click the link to "Create a Netfile User Account";

3) Complete the form and click "Create Netfile User";

4) A confirmation e-mail will be sent to the e-mail address that you provided on the form to verify the authenticity of the account. Open the e-mail and click the link; and

5) Your web browser will be taken to a page with a unique password. Print the page or write down the password and keep it in a safe place. The password can be changed later.

You have completed the process to register for a Netfile User Account. You must still complete Signature Verification Card (Form SFEC-112a) before you can sign electronic documents.

2. Complete a Signature Verification Card (Form SFEC-112a)

All signers should complete the following steps to complete the Signature Verification Card (Form SFEC-112a):

1) Go to the Ethics Commission's web site at <u>http://www.sfethics.org</u> and click to login to the campaign finance electronic filing under the heading "E-File Statements";

2) Enter your e-mail address and password and click "Log In";

3) Click your name in the upper right corner of the screen to access the "Netfile User Home" if you are not taken to the page by default;

4) Click "Signature Verification" and then "Request Document Signer Status";

5) Enter your complete name as it would be signed on an official document, and click "Create New Signer";

6) The system will produce a Signer ID and PIN number. Write down the Signer ID and PIN number and keep them in a safe place;

7) Click the "Print and Sign your Signature Card (for San Francisco filers)" link;

8) Do one of the following;

a) Bring the Signature Verification Card (Form SFEC-112a) and photo identification (SF City ID Card, State ID Card, or Passport) to the Ethics Commission and sign the statement in the presence of an Ethics Commission staff person; or

b) Bring the Signature Verification Card (Form SFEC-112a) to a notary public and sign the statement in his or her presence. Documents verified by a notary public must have an official and current stamp. Once authorized, you may deliver the original signed Signature Verification Card (Form SFEC-112a) to the Ethics Commission. The Ethics Commission will not accept copies of the form.

Once your Signature Verification Card (Form SFEC-112a) has been approved by Ethics Commission staff, you will be able to sign electronic statements.

3. Establish an Electronic Filing Account for a Committee

If you have not filed electronic campaign finance statements previously, you will need to establish an electronic filing account for your committee. The committee electronic filing account differs from the Netfile User Account. The committee electronic filing account contains the transactions and forms for the committee and may be accessed by multiple committee officers with unique Netfile User Accounts.

Most often, the treasurer controls the electronic filing account for the committee. However, any authorized officer of a committee may be granted access. Additional signers on a statement, including controlling candidates, assistant treasurers, and principal officers who are required to sign statements but who are not entering information into the FPPC forms do not need access to the committee's account to sign statements. Access to the account is required only to complete the contents of FPPC forms. At least one officer of the committee must have access to the electronic filing account for the committee.

Each committee officer requesting access to the electronic filing account for the committee to complete FPPC forms should complete the following steps to create an electronic filing account for the committee:

1) Go to the Ethics Commission's web site at <u>http://www.sfethics.org</u> and click to register for campaign finance electronic filing under the heading "E-File Statements";

2) Click the link to the "Committee Account Registration Form (Form SFEC-112b)";

3) Complete the form and click the "Submit" button. Ethics Commission staff will review the request and send the account credentials to the e-mail address provided on the form. If you are using the free electronic filing system then continue to step four. If you are using third-party vendor software, you have finished the registration process;

4) When you receive the committee Filer ID and Password to the committee via e-mail, go to the Ethics Commission's web site at <u>http://www.sfethics.org</u> and click to login to the campaign finance electronic filing under the heading "E-File Statements";

5) Click your name in the upper-right corner of the page to access the Netfile User Home;

6) Click "Add a Free Account" and then "Local Campaign Filer Account";

7) Complete the form. **Enter the "Committee Name" exactly as you entered it on FPPC Form 410.** Enter the Filer ID and Password provided in the e-mail in step 4; and

8) Click "Link Local Campaign Filer Account";

You now have access to the committee's electronic filing account from your Netfile User Account.

<u>How to Complete an Electronic Statement and Obtain Electronic Signatures From All Signers</u> <u>Using the Free Electronic Filing System</u>

The treasurer or principal officer of the committee should complete the following steps to create a statement and obtain the electronic signatures of all signers on the statement:

1) To sign electronic statements using the free electronic filing system, login to your Netfile user account and, if you have access to more than one committee, click the appropriate committee name.

2) Click the "Statements" menu and choose "Officer Information." Click your name in the "All Officers" table. If you are not listed as an officer, click to "Add a New Officer";

3) Under "Signatory Information," click the check box next to "Can Officer Sign Statements" and enter your Signer ID number in the box. Click to "Save Changes";

4) Add any additional required signers to the "All Officers" table, such as a controlling candidate, principal officer, or assistant treasurer and enter each individual's Signer ID. Complete steps 2-4 only once;

5) Proceed with entering the committee's transactions into the electronic filing system;

6) When creating a new draft statement, click the name of each signatory in one of the four signer boxes;

7) Create the draft statement and review the document by clicking the "View" button from the home page;

8) Click "E-file" to submit the statement;

9) Enter a valid e-mail address to receive an e-mail confirmation of submission and click "Submit E-Filing to Agency." Your filing will be moved into a pending queue, awaiting the confirmation of all signers. If the committee officer who submitted the statement is also a signer, that committee officer must also sign the statement;

10) An e-mail will be sent to all signers notifying them that a statement is awaiting their review and signature. Instruct any additional signers to check their e-mail and follow the instructions in the e-mail to sign the document. Statements that are not signed by all signers within 30 days will be removed from the pending statements queue. The system will e-mail daily reminders to each signer as a reminder to review the statement;

12) Click your name in the upper-right corner of the page to access the Netfile User Home;

13) Click "Signature Verification" and then "View Pending Filings";

14) Click "View Filing" to review the statement;

15) Click "Accept" or "Reject" to approve or disapprove of the statement; and

16) Enter your signer PIN number and click "Accept/Reject Filings." The statement will automatically submit to the Ethics Commission once <u>ALL</u> of the signers have signed the statement.

Secondary signers, such as a controlling candidate, assistant treasurer, or principal officer, should complete the following steps to sign a document:

1) After the treasurer has submitted a statement, you will receive an e-mail notification that a statement awaits your review. Click the link in the e-mail to be taken to the system login screen;

2) Login to the electronic filing system using your Netfile User Account credentials;

3) Click your name in the upper-right corner of the page to access the "Netfile User Home" if you are not taken to that page by default;

4) Click "Signature Verification" and then "View Pending Filings";

- 5) Click "View Filing" to review the statement;
- 6) Click "Accept" or "Reject" to approve or disapprove of the statement; and

7) Enter your signer PIN number and click "Accept/Reject Filings." The statement will automatically submit to the Ethics Commission once <u>ALL</u> of the signers have signed the statement.

Statements will not be considered accepted until <u>ALL</u> of the signers indicated on the draft statement have completed the signature process by reviewing the statement and entering their respective PIN numbers. If a statement in the pending filings queue before a filing deadline, but is not verified by all signers until after the filing deadline, the statement will be considered late.

How to Sign Statements Using Electronic Filing Software From Third-Party Vendors

Committees subject to electronic filing requirements must file electronic forms in the California Secretary of State's CAL format version 2.01. No other electronic format will be accepted. Committees can satisfy this requirement by filing in the San Francisco Ethics Commission free electronic filing system, as detailed above.

Alternatively, committees may choose to enter their filing information into software produced by thirdparty vendors certified by the Secretary of State. A list of third-party vendors is available at the following address: <u>http://www.sos.ca.gov/prd/approved_vendors.htm</u> All signers of electronic statements, regardless of whether the committee is using the free electronic filing system or a third-party vendor system, must have a Netfile User Account and complete the Signature Verification Card (Form SFEC-112a). All committees must also have an electronic filing account with the Ethics Commission to file electronic statements.

Committees using approved third-party software must input the Signer ID number for each signer into the CAL document in the third field of the "CVR3" record. Third-party vendors may require that filers complete this process manually or may support inputting the Signer ID number automatically in the CAL document from within the software product. Third-party vendors may require filers to use the Ethics Commission's free electronic filing system to approve and sign statements or may provide a method to sign statements from within the software product. Any third-party vendor can support signing electronic statements and submitting statements directly into the Ethics Commission's electronic filing system by complying with the open source Vendor Submission API at https://bitbucket.org/netfileopensource. Contact your vendor for more information about how your software complies with the electronic signature requirements.

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SFEC Form 112a - SIGNATURE VERIFICATION CARD

IMPORTANT! The notification e-mail address listed below should be an address you check frequently!

Name	: Automatically Completed by System (ID # XXXXXX)
Daytime Phone	: Automatically Completed by System
Notification E-mail Address	: Automatically Completed by System

By signing and submitting this Signature Verification Card, I acknowledge that documents filed electronically with the San Francisco Ethics Commission using the ID number set forth above will bear my virtual signature and that I am signing such documents under penalty of perjury under the laws of the State of California.

I also acknowledge that every electronically filed document bearing my virtual signature will be treated the same as a paper document bearing my actual signature for purposes of applicable state and local law.

x		
	Signature	Date

If you are submitting this form in person, you must show a government issued photo identification and sign this in the presence of Ethics Commission staff. If you are submitting this form by mail, you must have your signature acknowledged by a notary public.

Staff/Notary Public Use Only				
The forgoing instrument wa	s subscribed and sworn to/a	ffirmed before me this	day of _{Day}	h.,
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