MEMORANDUM

To: All College Presidents
From: General Counsel and Sr. Vice Chancellor Frederick P. Schaffer
Re: Amendments to the Legislative Law Regarding Lobbyists Requiring Immediate Attention
Date: August 30, 2012

Please be advised that The Public Integrity Reform Act of 2011 ("PIRA") (Chapter 399, Laws of 2011) amended the New York State Legislative Law article one-A, effective August 15, 2011. Among the notable amendments is the newly defined concept of a "reportable business relationship" which must be disclosed by any person or entity which does business with certain state employees.

The Joint Commission of Public Ethics ("JCOPE") issued its final Guidelines on changes to the lobbying laws at its meeting held on August 28, 2012. A copy of the Guidelines is attached to this memorandum. The timing of the issuance of the final Guidelines has resulted in a very short ten (10) day period within which to file the attached NY State Lobbyist Business Relationship Form.

The attached form must be completed by all covered individuals and returned to Eileen Goldmann, the Director of State Relations for CUNY, by the close of business on Thursday, September 6, 2012.

Central to the amendments to the prior law are the enhanced reporting requirements of clients of lobbyists. Under PIRA, the executive management of an organization is considered to be the
client of any lobbyist who is retained, employed or designated to carry on lobbying activities on behalf of the organization. Any entity or person who is deemed to be a client under PIRA must disclose on the attached form any reportable business relationship with any individual who is a statewide elected official, state officer, state employee, member of the legislature or legislative employee (defined in PIRA as a “State Person”). CUNY employs lobbyists, therefore, the executive management of CUNY, its Colleges and Units, are clients of its lobbyists and therefore must disclose, semi-annually, CUNY’s reportable business relationships with state persons.

For our purposes at CUNY, this will require a review by each College and Unit of any and all business relationships with a State Person so that these relationships can be properly reported. For example, any College that employs a State Senator or Legislator on its faculty or in any capacity must disclose this as a reportable business relationship. As stated in the attached Guidelines, a reportable business relationship is defined very broadly, and does not require a written instrument to qualify, nor does it require actual compensation to be paid.

Accordingly, all CUNY employees who meet the definition of clients in the attached Guidelines must complete the attached form(s) for each reportable business relationship and email it to Eileen Goldmann at CUNY’s Albany office, at Eileen.Goldmann@mail.cuny.edu by the close of business on September 6, 2012.

Penalties for not filing in a timely manner may subject CUNY and/or individuals at CUNY to a civil penalty not to exceed the greater of $25,000 or the monetary value of the relationship that was not reported and/or late fees. False filings are subject to civil penalties not to exceed the greater of $50,000 or five times the monetary value of the relationship that was not reported.

Attachments
REPORTABLE BUSINESS RELATIONSHIP GUIDELINES: LOBBYISTS

The Public Integrity Reform Act of 2011 ("PIRA") (Chapter 399, Laws of 2011) amended Legislative Law article one-A by enacting requirements, effective August 15, 2011, that lobbyists who lobby on their own behalf and clients of lobbyists make publicly available information about business relationships with certain state employees and officials. The requirements to disclose these “Reportable Business Relationships” are found in Legislative Law §§1-c(w), 1-e(c)(8)(i)-(iii) and 1-j(b)(6)(i)-(iii). These guidelines clarify the Reportable Business Relationship reporting requirements.

Relationship: A relationship means either a formal or informal agreement or understanding in which

a lobbyist pays, gives or promises Compensation to: (a) an individual whom the lobbyist knows or has reason to know is a State Person; (b) a non-governmental entity for which the lobbyist knows or has reason to know that a State Person is a proprietor, partner, director, officer or manager, or owns or controls ten percent or more of the stock of such entity (or one percent in the case of a corporation whose stock is regularly traded on an established securities exchange) (These roles and positions are referred to as the “Requisite Involvement.”); or (c) a third-party as directed by the State Person or as directed by an entity in which the State Person has the Requisite Involvement and

such Compensation is in exchange for goods, services or anything of value either performed or provided or intended to be performed or provided by the State Person or an entity in which the State Person has the Requisite Involvement.

The agreement or understanding need not be express or in writing and need not be enforceable under contract law to be considered a Relationship.

Notwithstanding the foregoing, medical, dental and mental health services and treatment are excluded from the definition of Relationship. Additionally, legal services with respect to investigation or prosecution by law enforcement authorities, bankruptcy or domestic relations matters are excluded from the definition of Relationship.

State Person: State Person means an individual who is a statewide elected official, state officer, state employee, member of the legislature or legislative employee.

“Reason to know”: Whether a lobbyist has “reason to know” that (i) an individual is a State Person, or (ii) a State Person has the Requisite Involvement with an entity, is based on an examination of the totality of the facts and circumstances.

If a reasonable person, looking at all the facts and circumstances, would conclude that a lobbyist should know that an individual is a State Person or that a State Person has the Requisite Involvement with the relevant entity, then the “reason to know” standard has been satisfied. Some, but not all, factors that may be considered in this analysis are:

- Origins of the relationship;
- Length of the relationship;
The type and actual value of the goods, services or items provided;

Whether the fact that the individual is a State Person or the Requisite Involvement of the State Person with the entity at issue is generally known to the public; or

Any efforts by the lobbyist to obtain information relating to the fact that the individual is a State Person or the Requisite Involvement of the State Person in the entity at issue.

- The fact that potentially relevant information can be obtained by requesting a Financial Disclosure Statement or submitting a FOIL request does not necessarily establish that a lobbyist had reason to know the information.

A lobbyist will be deemed to have had reason to know if his lack of knowledge results from willfully ignoring information that would lead a reasonable person to (i) conclude that the individual was a State Person, or that a State Person had the Requisite Involvement, or (ii) undertake further research to determine whether either fact exists.

Compensation: “Compensation” means any salary, fee, gift, payment, benefit, loan, advance or any other thing of value. For the purposes of these guidelines, Compensation does not include:

- commercially available consumer and business loans or lines of credit made on substantially the same terms (including interest rates and collateral) as, and following credit underwriting procedures that are not less stringent than, those prevailing at the time for comparable transactions by the lender with other persons or entities that are not covered by these guidelines and does not involve more than the normal risk of repayment or present other unfavorable features;

- goods and services, or discounts for goods and services, offered to the general public or a segment of the general public defined on a basis other than status as a State Person, or an entity in which a State Person has the Requisite Involvement, and offered on the same terms and conditions as the goods or services are offered to the general public or segment thereof;

- dividends or payments related to stock repurchases, insurance payments, interest payments or any other similar payments offered to the general public or a segment of the general public defined on a basis other than status as a State Person, or an entity in which a State Person has the Requisite Involvement, and offered on the same terms and conditions as the payments are offered to the general public or segment thereof; or

- contributions reportable pursuant to article 14 of the election law.

Consequently, relationships involving transactions of the type identified above do not need to be reported.

**Example:** Lobbyist Smith gives State Person Jones a six-year-term loan for $5,000 at prevailing market rates. Lobbyist Smith’s loan is not commercially available, and therefore constitutes Compensation. Lobbyist Smith knows State Person Jones is a legislative employee. This is a Reportable Business Relationship that Lobbyist Smith must disclose.

**Reporting Period:** Any Reportable Business Relationship, regardless of when the relationship commenced, must be reported if that relationship is, or will be, in existence during the biennial cycle covered by the lobbyist registration statement. A Reportable Business Relationship exists
during the reporting period if any of the following is present during that period: (i) Compensation is paid; (ii) goods, services or anything of value are performed or provided; or (iii) the Relationship is in existence, even if Compensation has not yet been paid and goods, services or anything of value have not yet been performed or provided.

Example: On December 13, 2012, Lobbyist Smith entered into a contract with Senator Doe that calls for $5,000 worth of services to be performed. The contract calls for Compensation for those services to be paid on January 10, 2015. Lobbyist Smith must disclose this Reportable Business Relationship in the biennial registration statements that are to be made no later than January 1, 2013 and January 1, 2015.

“Intended to be performed or provided”: “Intended” here means the goods, services or anything of value have not yet been performed or provided, but the lobbyist reasonably anticipates such goods, services or anything of value to be performed or provided in the future.

“Performed or provided”: Performed or provided means that a State Person or entity in which the State Person has the Requisite Involvement either (i) actually performed or provided the goods, services or anything of value, or (ii) had a significant, but not necessarily exclusive or primary role, in performing or providing the goods, services or anything of value.

“$1,000 annually”: The annual period is any 12 consecutive months in which more than $1,000 in goods, services or anything of value is performed or provided by a State Person or an entity in which a State Person has the Requisite Involvement.

a. Relationships of one year or less: If the value of goods, services or anything of value is more than $1,000, the threshold is met.

b. Relationship of more than one year: Relationships of more than one year will be reportable if:

i. the Compensation received exceeds $1,000 during any consecutive 12 months;

ii. the value of the goods, services or anything of value performed or provided exceeds $1,000 during any consecutive 12 months;

iii. outstanding Compensation for goods, services or anything of value already performed or provided exceeds $1,000; or

iv. the value of the goods, services or anything of value to be performed or provided in exchange for Compensation already received exceeds $1,000.

Aggregation: If a lobbyist has multiple Relationships with the same State Person or the same entity in which a State Person has the Requisite Involvement, the value of goods, services or anything of value of all such Relationships should be aggregated. If the aggregated value of the Relationships is more than $1,000 for any 12-month period, then each such relationship is a Reportable Business Relationship (assuming the other criteria have been satisfied).

Example: Lobbyist Smith has a Relationship with Legislator Doe for which he paid Legislator Doe $750 on November 12, 2013. He then enters into a different Relationship with Legislator Doe on October 25, 2014, the value of which is $300. Because the two Relationships occurred within 12 months of each other, they must be aggregated. When
aggregated, the total value exceeds $1,000. Consequently, the two relationships taken together constitute a Reportable Business Relationship, and each of the relationships must be disclosed.

**Reporting Requirements:** For each Reportable Business Relationship, the lobbyist shall disclose the information contained in Legislative Law §1-e(c)(8)(i)-(iii). For the information required in subsection (iii), the lobbyist shall disclose either the actual or anticipated amount of Compensation, including expenses, to be paid and paid by virtue of the Relationship.

**Duty to Amend:** A lobbyist has a duty to amend its biennial registration statement within 10 days of an event that necessitates a material change in any of the required information set forth in Legislative Law §1-e(d). For example, if, after having filed a biennial registration statement, a Reportable Business Relationship arises, or a lobbyist learns of a Reportable Business Relationship that was not previously disclosed, a lobbyist shall file an amendment to the biennial registration statement pursuant to Legislative Law §1-e(d).

Similarly, a lobbyist has a duty to amend its biennial registration statement when it discovers that the actual or anticipated amount of Compensation in connection with the Reportable Business Relationship materially varies from the anticipated amount that was previously reported.

Failure to timely amend a biennial registration statement could subject a lobbyist to a late fee and/or a civil penalty as set forth, respectively, in Legislative Law §1-e(e)(iii) and §1-o.

**Penalties:** Failure to file in a timely manner subjects a lobbyist to (i) a civil penalty, as prescribed in Legislative Law §1-o(b)(i), in an amount not to exceed the greater of $25,000 or the amount it failed to report; and/or (ii) late fees as prescribed in Legislative Law §1-e(e)(iii). In the case of a false filing, the lobbyist will be subject to a civil penalty, as prescribed in Legislative Law §1-o(b)(ii), in an amount not to exceed the greater of $50,000 or five times the amount it failed to report.
REPORTABLE BUSINESS RELATIONSHIP GUIDELINES: CLIENTS

The Public Integrity Reform Act of 2011 ("PIRA") (Chapter 399, Laws of 2011) amended Legislative Law article one-A by enacting requirements, effective August 15, 2011, that lobbyists who lobby on their own behalf and clients of lobbyists make publicly available information about business relationships with certain state employees and officials. The requirements to disclose these “Reportable Business Relationships” are found in Legislative Law §§1-c(w), 1-e(c)(8)(i)-(iii) and 1-j(b)(6)(i)-(iii). These guidelines clarify the Reportable Business Relationship reporting requirements.

Client: The term “Client,” pursuant to Legislative Law §1-c(b), includes every person or organization who retains, employs or designates any person or organization to carry on lobbying activities on behalf of such Client. With respect to an organization, the term Client also includes proprietors, partners, directors, or executive management of the organization.

Relationship: A relationship means either a formal or informal agreement or understanding in which a Client pays, gives or promises Compensation to: (a) an individual whom the Client knows or has reason to know is a State Person; (b) a non-governmental entity for which the Client knows or has reason to know that a State Person is a proprietor, partner, director, officer or manager, or owns or controls ten percent or more of the stock of such entity (or one percent in the case of a corporation whose stock is regularly traded on an established securities exchange) (These roles and positions are referred to as the “Requisite Involvement.”); or (c) a third-party as directed by the State Person or as directed by an entity in which the State Person has the Requisite Involvement and such Compensation is in exchange for goods, services or anything of value either performed or provided or intended to be performed or provided by the State Person or an entity in which the State Person has the Requisite Involvement.

The agreement or understanding need not be express or in writing and need not be enforceable under contract law to be considered a Relationship.

Notwithstanding the foregoing, medical, dental and mental health services and treatment are excluded from the definition of Relationship. Additionally, legal services with respect to investigation or prosecution by law enforcement authorities, bankruptcy or domestic relations matters are excluded from the definition of Relationship.

State Person: State Person means an individual who is a statewide elected official, state officer, state employee, member of the legislature or legislative employee.

“Reason to know”: Whether a Client has “reason to know” that (i) an individual is a State Person, or (ii) a State Person has the Requisite Involvement with an entity, is based on an examination of the totality of the facts and circumstances.

If a reasonable person, looking at all the facts and circumstances, would conclude that a Client should know that an individual is a State Person or that a State Person has the Requisite
Involvement with the relevant entity, then the “reason to know” standard has been satisfied. Some, but not all, factors that may be considered in this analysis are:

- Origins of the relationship;
- Length of the relationship;
- The type and actual value of the goods, services or items provided;
- Whether the fact that the individual is a State Person or the Requisite Involvement of the State Person with the entity at issue is generally known to the public; or
- Any efforts by the Client to obtain information relating to the fact that the individual is a State Person or the Requisite Involvement of the State Person in the entity at issue.
  - The fact that potentially relevant information can be obtained by requesting a Financial Disclosure Statement or submitting a FOIL request is not necessarily sufficient to establish that a Client had reason to know the information.

A Client will be deemed to have had reason to know if his lack of knowledge results from willfully ignoring information that would lead a reasonable person to (i) conclude that the individual was a State Person, or that a State Person had the Requisite Involvement, or (ii) undertake further research to determine whether either fact exists.

Compensation: “Compensation” means any salary, fee, gift, payment, benefit, loan, advance or any other thing of value. For the purposes of these guidelines, Compensation does not include:

- commercially available consumer and business loans or lines of credit made on substantially the same terms (including interest rates and collateral) as, and following credit underwriting procedures that are not less stringent than, those prevailing at the time for comparable transactions by the lender with other persons or entities that are not covered by these guidelines and does not involve more than the normal risk of repayment or present other unfavorable features;
- goods and services, or discounts for goods and services, offered to the general public or a segment of the general public defined on a basis other than status as a State Person, or an entity in which a State Person has the Requisite Involvement, and offered on the same terms and conditions as the goods or services are offered to the general public or segment thereof;
- dividends or payments related to stock repurchases, insurance payments, interest payments or any other similar payments offered to the general public or a segment of the general public defined on a basis other than status as a State Person, or an entity in which a State Person has the Requisite Involvement, and offered on the same terms and conditions as the payments are offered to the general public or segment thereof; or
- contributions reportable pursuant to article 14 of the election law.

Consequently, relationships involving transactions of the type identified above do not need to be reported.

Example: Legislative Employee Jones purchases a new car from Car Dealership Y, which is a Client. Jones obtains financing from Car Dealership Y on terms that are generally available to the public. Car Dealership Y does not need to report this relationship.
Example: Cable Company X is a Client. State Senator Doe’s yearly cable bill totals $1,200 for a package of services that is available to the general public at the same rate. Because Cable Company X is providing a service that is generally offered, it does not qualify as Compensation, and Cable Company X need not report its agreement with Senator Doe as a Reportable Business Relationship.

Reporting Period: Any Reportable Business Relationship, regardless of when the relationship commenced, must be reported if that relationship is, or will, be in existence during the semi-annual reporting period covered by the filing. A Reportable Business Relationship exists during the reporting period if any of the following is present during that period: (i) Compensation is paid; (ii) goods, services or anything of value are performed or provided; or (iii) the Relationship is in existence, even if Compensation has not yet been paid and goods, services or anything of value have not yet been performed or provided.

Example: In the July 1, 2013 to December 31, 2013 semi-annual period, Client Smith entered into a contract with Senator Doe that calls for $1,500 of services to be performed and Compensation to be paid in October 2014. Client Smith must disclose this Reportable Business Relationship in the Client Semi-Annual Reports that are to be made by January 15, 2014, July 15, 2014, and January 15, 2015.

Should a Client also be required to file a biennial registration statement, such requirement does not relieve the Client from its obligation to disclose Reportable Business Relationships in its semi-annual reports.

“Intended to be performed or provided”: “Intended” here means the goods, services or anything of value have not yet been performed or provided, but the Client reasonably anticipates such goods, services or anything of value to be performed or provided in the future.

“Performed or provided”: Performed or provided means that a State Person or entity in which the State Person has the Requisite Involvement either (i) actually performed or provided the goods, services or anything of value, or (ii) had a significant, but not necessarily exclusive or primary role, in performing or providing the goods, services or anything of value.

“$1,000 annually”: The annual period is any 12 consecutive months in which more than $1,000 in goods, services or anything of value is performed or provided by a State Person or an entity in which a State Person has the Requisite Involvement.

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b. Relationship of more than one year: Relationships of more than one year will be reportable if:
   i. the Compensation received exceeds $1,000 during any consecutive 12 months;
   ii. the value of the goods, services or anything of value performed or provided exceeds $1,000 during any consecutive 12 months;
   iii. outstanding Compensation for goods, services or anything of value already performed or provided exceeds $1,000; or
iv. the value of the goods, services or anything of value to be performed or provided in
exchange for Compensation already received exceeds $1,000.

Aggregation

If the Client has multiple Relationships with the same State Person or the same entity in
which a State Person has the Requisite Involvement, the value of goods, services or
anything of value of all such Relationships should be aggregated. If the aggregated value
of the Relationships is more than $1,000 for any 12-month period, then each such
relationship is a Reportable Business Relationship (assuming the other criteria have been
satisfied).

Example: Client Smith has a Relationship with Legislator Doe for which he paid
Legislator Doe $750 on November 12, 2013. He then enters into a different relationship
with Legislator Doe on October 25, 2014, the value of which is $300. Client Smith need
not disclose the first relationship on either the January 15, 2014 or July 15, 2014 Client
Semi-Annual Reports. But Client Smith must disclose the two relationships on its
January 15, 2015 Client Semi-Annual Report. Because the two relationships occurred
within 12 months of each other, they must be aggregated. When aggregated, the total
value exceeds $1,000 and consequently the two relationships must be disclosed.

Reporting Requirements: For each Reportable Business Relationship, the Client shall disclose
the information contained in Legislative Law §1-j(a)(6)(i)-(iii). For the information required in
subsection iii, the Client shall disclose either the actual or anticipated amount of Compensation,
including expenses, to be paid and paid by virtue of the Relationship.

Accuracy of Reported Information: The Client has a duty to ensure that the information it has
provided is accurate, current and complete. For example, if, after having filed a Client Semi-
Annual Report, a Reportable Business Relationship arises, or a Client learns of a Reportable
Business Relationship that was not previously disclosed, a Client shall update and correct its
Client Semi-Annual Report.

Similarly, a Client shall update and correct its Client Semi-Annual Report when it discovers that
the actual or anticipated amount of compensation in connection with the Reportable Business
Relationship materially varies from the anticipated amount that was previously reported.

Failure to update and correct a Client Semi-Annual Report after a Reportable Business
Relationship has been discovered could subject a Client to a late fee and/or civil penalty as set
forth, respectively, in Legislative Law §1-j(c)(3) and §1-o.

Penalties: Failure to file in a timely manner subjects a Client to (i) a civil penalty, as prescribed
in Legislative Law §1-o(b)(i), in an amount not to exceed the greater of $25,000 or the amount it
failed to report; and/or (ii) late fees as prescribed in Legislative Law §1-j(c)(iii). In the case of a
false filing, the Client will be subject to a civil penalty, as prescribed in Legislative Law §1-
o(b)(ii), in an amount not to exceed the greater of $50,000 or five times the amount it failed to report.
## I Reporting Information

Biennial Period:  
Fill in circle if amendment: ○

## II Principal Lobbyist Information

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Business Phone:  
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☐ Continued on attached pages.

### III Declaration

This Declaration must be signed by the principal lobbyist. If the principal lobbyist is an organization, the Chief Administrative Officer of such organization must sign this Declaration. (If the Chief Administrative Officer, for any reason, does not sign, he/she must duly designate another person to sign this Declaration.) (See instructions.)

I declare under penalty of perjury that the information contained in this report is true, correct, and complete to the best of my knowledge and belief.

**X**  
**SIGNATURE:**  
**DATE:**

**PRINT NAME: LAST**  
**FIRST**

Mark One:  
☐ Principal Lobbyist  
☐ Chief Administrative Officer  
☐ Designee (Attach Letter)
## Designated Addendum sheet for section III.

Please use the following addendum pages as continuation for the specified sections. If additional space is needed, please make a copy of this sheet.

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