

**ACT 44 DISCLOSURE FORM FOR ENTITIES PROVIDING
PROFESSIONAL SERVICES TO THE
EAST EARL TOWNSHIP'S PENSION SYSTEM**

CHAPTER 7-A OF ACT 44 OF 2009 MANDATES the annual disclosure of certain information by every entity (hereinafter "Contractor") which is a party to a professional services contract with one of the pension funds of EAST EARL TOWNSHIP (hereinafter the "Requesting Municipality"). Act 44 disclosure requirements apply to *Contractors* who provide professional pension services and receive payment of any kind from the Requesting Municipality's pension fund. The Requesting Municipality has determined that your company falls under the requirements of Act 44 and must complete this disclosure form. You are expected to submit this completed form, to the Requesting Municipality below, by **December 17, 2010**. If, for any reason you believe that Act 44 does not require you to complete this disclosure form, please provide a written explanation of your reason(s) by **December 3, 2010**.

**RETURN COMPLETED
DISCLOSURE TO:**

East Earl Township
Attn: Connie J. Gross, CAO
4610 Division Highway
East Earl, PA 17519
717-354-5593 Ext. 22
eastearltwp@comcast.net

REQUIRED UPDATES:

Where noted, information in this form must be updated in writing as changes occur.

DEFINITIONS FOR DISCLOSURE

TERM	DEFINITION
CONTRACTOR	Any person, company, or other entity that receives payments, fees, or any other form of compensation from a municipal pension fund in exchange for rendering professional services for the benefit of the municipal pension fund.
SUBCONTRACTOR OR ADVISOR	Anyone who is paid a fee or receives compensation from a municipal pension system – directly or indirectly from or through a contractor.
AFFILIATED ENTITY	Any of the following: <ol style="list-style-type: none"> 1. A subsidiary or holding company of a lobbying firm or other business entity owned in whole or in part by a lobbying firm. 2. An organization recognized by the Internal Revenue Service as a tax-exempt organization under section 501(c) of the Internal Revenue Code of 1986 (Public Law 99-514, 26 U.S.C. § 501 (c)) established by a lobbyist or lobbying firm or an affiliated entity.
CONTRIBUTIONS	As defined in section 1621 of the act of June 3 rd , 1937 (P.L. 1333, No. 320), known as the Pennsylvania Election Code
POLITICAL COMMITTEE	As defined in section 1621 of the act of June 3 rd , 1937 (P.L. 1333, No. 320), known as the Pennsylvania Election Code
EXECUTIVE LEVEL EMPLOYEE	Any employee or person or the person's affiliated entity who: <ol style="list-style-type: none"> 1. Can affect or influence the outcome of the person's or affiliated entity's actions, policies, or decisions relating to pensions and the conduct of business with a municipality or a municipal pension system; or 2. Is directly involved in the implementation or development policies relating to pensions, investments, contracts or procurement or the conduct of business with a municipality or municipal pension system.
MUNICIPAL PENSION SYSTEM	Any qualifying pension plan, under Pennsylvania state law, for any municipality within the Commonwealth of Pennsylvania; includes the Pennsylvania Municipal Retirement System. <i>Example: the Police Pension Plan for the Borough of Winchesterville</i>
MUNICIPAL PENSION SYSTEM OFFICIALS AND EMPLOYEES; MUNICIPAL OFFICIALS AND EMPLOYEES	Specifically , those listed in TABLE 2 titled: "List of Pension System and Municipal Officials and Employees" on the next page. Where applicable, includes any employee of the Requesting Municipality.
PROFESSIONAL SERVICES CONTRACT	A contract to which the municipal pension system is a party that is: (1) for the purchase of professional services including investment services, legal services, real estate services, and other consulting services; and, (2) not subject to a requirement that the lowest bid be accepted.

List of Municipal Officials for the Requesting Municipality

Certain requests for information in this form will refer to a "List of Municipal Officials."

To assist you in preparing your answers, you should consider the following names to be a complete list of pension system and municipal officials and employees. Throughout this Disclosure Form, the below names will be referred to as the "*List of Municipal Officials.*"

Elected Officials

David H. Zimmerman, Chairman, Board of Supervisors

Earl H. Kreider, Vice Chairman, Board of Supervisors

Joe E. Shriver, Member, Board of Supervisors

Appointed Officials or Employees

Connie J. Gross, Secretary-Treasurer/CAO, Non-Uniform Plan, CAO, Police Pension Plan

IDENTIFICATION OF CONTRACTORS & RELATED PERSONNEL

CONTRACTORS: (See "Definitions" – page 2) Any entity who currently provides service(s) by means of a Professional Services Contract to the Municipal Pension System of the Requesting Municipality, please complete all of the following:

Identify the Municipal Pension System(s) for which you are providing information:

Indicate all that apply with an "X": Non-Uniform Plan Police Plan
 Fire Plan

****NOTE:** For all that follow, you may answer the questions / items on a separate sheet of paper and attach it to this Disclosure if the space provided is not sufficient. Please reference each question / item you are responding to by the appropriate number. (example: REF – Item #1.)

- 1. Please provide the names and titles of all individuals providing professional services to the Requesting Municipality's pension plan(s) identified above. Also include the names and titles of any advisors and subcontractors of the Contractor, identifying them as such. After each name provide a description of the responsibilities of that person with regard to the professional services being provided to each designated pension plan.

Chris Dagnault, Assistant Vice President, Contact Center - Leader of area with staff responsible for answering incoming inquiries relating to in-force contract products and client information, providing service to customers and performing financial and non-financial transactions.

Eileen Demayo, Assistant Director In Force Contract Services - Leader of area with staff responsible for ongoing account transactions, e.g. address changes, withdrawals.

Joe Oberheuser, Director, Annuity Benefit Services - Leader of area with staff responsible for the review and processing of beneficiary changes, ownership changes, collateral assignments, adding powers of attorney and for the payment of death benefits.

- 2. Please list the name and title of any Affiliated Entity and their Executive-level Employee(s) that require disclosure; after each name, include a brief description of their duties. (See: Definitions)

None

- 3. Are any of the individuals named in Item 1 or Item 2 above, a current or former official or employee of the Requesting Municipality?

➡ IF "YES", provide the name and of the person employed, their position with the municipality, and dates of employment.

No

- 4. Are any of the individuals named in Item 1 or Item 2 above a current or former registered Federal or State lobbyist?

➡ IF "YES", provide the name of the individual, specify whether they are a state or federal lobbyist, and the date of their most recent registration /renewal.

No

NOTICE: All information provided for items 1- 4 above must be updated as changes occur.

- 5. Since December 17th 2009, has the *Contractor* or an *Affiliated Entity* paid compensation to or employed any third party intermediary, agent, or lobbyist that is to directly or indirectly communicate with an official or employee of the *Municipal Pension System* of the **Requesting Municipality (OR)**, any municipal official or employee of the **Requesting Municipality** in connection with any transaction or investment involving the *Contractor* and the *Municipal Pension System* of the **Requesting Municipality**?

This question does not apply to an officer or employee of the *Contractor* who is acting within the scope of the firm's standard professional duties on behalf of the firm, including the actual provision of legal, accounting, engineering, real estate, or other professional advice, services, or assistance pursuant to the professional services contact with municipality's pension system.

- ➔ IF "YES", identify: (1) whom (the third party intermediary, agent, or lobbyist) was paid the compensation or employed by the *Contractor* or *Affiliated Entity*, (2) their specific duties to directly or indirectly communicate with an official or employee of the *Municipal Pension System* of the **Requesting Municipality (OR)**, any municipal official or employee of the **Requesting Municipality**, (3) the official they communicated with, and (4) the dates of this service.

No

- 6. Since December 17th 2009, has the *Contractor*, or any agent, officer, director or employee of the *Contractor* solicited a contribution to any municipal officer or candidate for municipal office in the **Requesting Municipality**, or to the political party or political action committee of that official or candidate?

- ➔ IF "YES", identify the agent, officer, director or employee who made the solicitation and the municipal officials, candidates, political party or political committee who were solicited (to whom the solicitation was made).

No

- 7. Since December 17th, 2009: Has the *Contractor* or an *Affiliated Entity* made any contributions to a municipal official or any candidate for municipal office in the **Requesting Municipality**?

- ➔ IF "YES", provide the name and address of the person(s) making the contribution, the contributor's relationship to the Contractor, The name and office or position of the person receiving the contribution, the date of the contribution, and the amount of the contribution.

No

- 8. Does the *Contractor* or an *Affiliated Entity* have any direct financial, commercial or business relationship with any official identified on the *List of Municipal Officials*, of the **Requesting Municipality**?

- ➔ IF "YES", identify the individual with whom the relationship exists and give a detailed description of that relationship.

****NOTE:** A written letter is required from the **Requesting Municipality** acknowledging the relationship and consenting to its existence. The letter must be attached to this disclosure. Contact the **Requesting Municipality** to obtain this letter and attach it to this disclosure before submission.

No

Note: Contractor performed a search for products directly issued by the Contractor to the List of Municipal Officials only. A search for products issued by subsidiaries and affiliates of the Contractor was not performed

9. Has the *Contractor* or an *Affiliated Entity* given any gifts having more than a nominal value to any official, employee or fiduciary – specifically, those on the *List of Municipal Officials* of the **Requesting Municipality**?

➔ **IF “YES”**, Provide the name of the person conferring the gift, the person receiving the gift, the office or position of the person receiving the gift, specify what the gift was, and the date conferred.

No

10. Disclosure of contributions to any political entity in the Commonwealth of Pennsylvania
Applicability: A “yes” response is required and full disclosure is required ONLY WHEN ALL of the following applies:

- a) The contribution was made within the last 5 years (specifically since: December 18th 2004)
- b) The contribution was made by an officer, director, executive-level employee or owner of at least 5% of the *Contractor* or *Affiliated Entity*.
- c) The amount of the contribution was at least \$500 and in the form of:
 - 1. A single contribution by a person in (b.) above, OR
 - 2. The aggregate of all contributions all persons in (b.) above;
- d) The contribution was for
 - 1. Any candidate for any public office or any person who holds an office in the Commonwealth of Pennsylvania;
 - 2. The political committee of a candidate for public office or any person that holds an office in the Commonwealth of Pennsylvania.

➔ **IF “YES”**, provide the name and address of the person(s) making the contribution, the contributor’s relationship to the *Contractor*, The name and office or position of the person receiving the contribution (or the political entity / party receiving the contribution), the date of the contribution, and the amount of the contribution.

No contributions by individuals. The Hartford’s Political Action Committee made contributions as outlined in the spreadsheet accompanying this form.

11. With respect to your provision of professional services to the Municipal Pension System of the **Requesting Municipality**:

Are you aware of any apparent, potential or actual conflicts of interest with respect to any officer, director or employee of the *Contractor* and officials or employees of the **Requesting Municipality**?

NOTE: If, in the future, you become aware of any apparent, potential, or actual conflict of interest, you are expected to update this **Disclosure Form** immediately in writing by:

- Providing a brief synopsis of the conflict of interest (and);
- An explanation of the steps taken to address this apparent, potential, or actual conflict of interest.

➔ **IF “YES”**, Provide a detailed explanation of the circumstances which provide you with a basis to conclude that an apparent, potential, or actual conflict of interest may exist.

No

12. To the extent that you believe that Chapter 7-A of Act 44 of 2009 requires you to disclose any additional information beyond what has been requested above, please provide that information below or on a separate piece of paper.

N/A

Please provide the name(s) and position(s) of the person(s) participating in the completion of this Disclosure. One of the individuals identified by the Contractor in Item #1 above must participate in completing this Disclosure and must sign the below verification attesting to the participation of those individuals named below.

Name: Eileen Demayo

Name: Chris Dagnault

Position: Assistant Director
In Force Contract Services

Position: Assistant Vice President
Contact Center

Name: Joe Oberheuser

Name: Vanessa Ramirez

Position: Director, Annuity Benefit Services

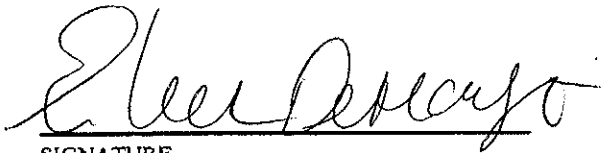
Position: Counsel, Government Affairs

Name: Kristen LeBlond

Name: Rich Fletcher

Position: Director, Compliance

Position: Assistant Director, Business Compliance



SIGNATURE

Assistant Director, In Force Contract Services

TITLE

January 10, 2011

DATE

VERIFICATION

I, Eileen Demayo, hereby state that I am Assistant Director, In Force Contract Services for
 (Name) (Position)
Hartford Life Insurance Company and I am authorized to make this verification.
 (Contractor)

I hereby verify that the facts set forth in the foregoing Act 44 Disclosure Form for Entities Providing Professional Services to East Earl Township Pension System are true and correct to the best of my knowledge, information and belief. I also understand that knowingly making material misstatements or omissions in this form could subject the responding Contractor to the penalties in Section 705-A(e) of Act 44.

I understand that false statements herein are made subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Eileen Demayo
 Signature
1-10-11
 Date

<u>State</u>	<u>Date</u>	<u>Committee Name</u>	<u>Memo</u>	<u>Contribution</u>
PA	01/26/04	Friends of Jake Corman	2004 General Senate District 034	\$ 500
PA	01/26/04	Friends of Joe Scarnati	2004 General Senate District 025	\$ 500
PA	10/19/06	PA INSURANCE PAC (PIPAC)	2006 PAC to PAC Contribution	\$ 5,000
PA	10/31/07	PA INSURANCE PAC (PIPAC)	2007 PAC to PAC Contribution	\$ 5,000
PA	02/28/08	PA INSURANCE PAC (PIPAC)	2008 PAC to PAC Contribution	\$ 5,000
PA	09/26/08	PA INSURANCE PAC (PIPAC)	2008 PAC to PAC Contribution	\$ 7,500
PA	12/16/09	Committee to Re-Elect Senator Mike Stack	2012 Primary Senate District 005	\$ 1,000
PA	12/16/09	Friends of Dominic Pileggi	2012 Primary Senate District 009	\$ 1,000
PA	12/16/09	Friends of Don White	2012 Primary Senate District 041	\$ 1,000
PA	12/16/09	Friends of Jake Corman	2010 Primary Senate District 034	\$ 500
PA	12/16/09	Friends of Joe Scarnati	2012 Primary Senate District 025	\$ 1,000
PA	12/16/09	Friends of Mike Gerber	2010 Primary House District 148	\$ 1,000
PA	12/16/09	PA INSURANCE PAC (PIPAC)	2009 PAC to PAC Contribution	\$ 5,000
PA	12/16/09	Senate Republican Campaign Committee	2009 PAC to PAC Contribution	\$ 1,000
PA	12/21/09	Tom Corbett for Governor	2010 Primary	\$ 1,000
PA	02/24/10	Tom Corbett for Governor	2010 Primary	\$ 250