

**ACT 44 DISCLOSURE FORM FOR ENTITIES PROVIDING
PROFESSIONAL SERVICES TO THE
WEST GOSHEN 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 **WEST GOSHEN 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 **October 31st, 2022**. 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 **October 21st, 2022**.

RETURN COMPLETED

DISCLOSURE TO:

West Goshen Township
Attn: Christopher Bashore
1025 Paoli Pike
West Chester, PA 19380
610-696-5266
CBashore@westgoshen.org

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: <i>"List of Pension System and Municipal Officials and Employees"</i> 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 West Goshen Township

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

Shaun Walsh, Jr. – Chairman

Ashley Gagne’ – Vice Chairman

John Hellmann – Member

Tinamarie Smith – Member

Robin Stuntebeck – Member

Appointed Officials or Employees

Christopher Bashore – Township Manager/Secretary

Christine Riffey – Finance Director/Treasurer

Michael Moffa – Sewer Plant Manager

David Woodward – Director Of Public Works

Kristin Camp – Solicitor

Pension Committee

Angelo Savelloni – Member

Robert Edwards – Police Pension Representative

David B. Brune – Member

Walker Tompkins – Member

Robert Holland – Member

Robert Sheller – Member

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.

Graig Nickel - Sr. Investment Consultant
Jean Lu - Principal
Daniel Newhall - Principal

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)

see attached

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

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 2008)
- 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

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.

Not Applicable

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: Graig Nickel

Name:

Position: Sr. Investment Consultant

Position:

Name:

Name:

Position:

Position:

Name:

Name:

Position:

Position:

Graig Nickel

SIGNATURE

Sr. Investment Consultant

TITLE

9/30/2022


DATE

VERIFICATION

I, Daniel Newhall, hereby state that I am Principal for
(Name) (Position)
Vanguard Advisors, Inc. 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 **West Goshen 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.



Signature

October 26, 2022

Date

VAI and VFTC Board of Directors and Officers:**VFTC:**

Director	Position	Entity
Anaokar, Sam	Director	Vanguard Fiduciary Trust Company
Bisordi, John	Director	Vanguard Fiduciary Trust Company
Brancato, Matthew C.	Director	Vanguard Fiduciary Trust Company
James, John	Chairman & Director	Vanguard Fiduciary Trust Company
Miller, Jodi	Director	Vanguard Fiduciary Trust Company
Rollings, Michael	Director	Vanguard Fiduciary Trust Company

Officer	Title	Entity
Alwine, Christopher W.	Vice President	Vanguard Fiduciary Trust Company
Ameriks, John	Vice President	Vanguard Fiduciary Trust Company
Anaokar, Sam	Vice President	Vanguard Fiduciary Trust Company
Barikos, Amy	Vice President	Vanguard Fiduciary Trust Company
Barrickman, Josh C.	Vice President	Vanguard Fiduciary Trust Company
Bisordi, John E.	Vice President and General Counsel	Vanguard Fiduciary Trust Company
Bock, Barbara	Controller	Vanguard Fiduciary Trust Company
Brancato, Matthew C.	Vice President	Vanguard Fiduciary Trust Company
Buchanan, Christine	Vice President	Vanguard Fiduciary Trust Company
Buckley, Tara	Vice President and Assistant Secretary	Vanguard Fiduciary Trust Company
Burke, Claire	Vice President	Vanguard Fiduciary Trust Company
Butler, Donald M.	Vice President	Vanguard Fiduciary Trust Company
Comegys, Rodney C.	Vice President and Chief Investment Officer	Vanguard Fiduciary Trust Company
Cosby, Caroline	Chief Audit Executive and Auditor	Vanguard Fiduciary Trust Company
Davis, Gregory	Vice President	Vanguard Fiduciary Trust Company
Devereux, Sara	Vice President	Vanguard Fiduciary Trust Company
Franquin, Christine	Vice President	Vanguard Fiduciary Trust Company
Galloway, John	Vice President	Vanguard Fiduciary Trust Company
Green, Sarah	Bank Secrecy Act Compliance Officer	Vanguard Fiduciary Trust Company
Jakubowski, Paul M.	Vice President	Vanguard Fiduciary Trust Company
James, John	Chairman, President, and Chief Executive Officer	Vanguard Fiduciary Trust Company
Johnson, Jeffrey	Vice President	Vanguard Fiduciary Trust Company
Kearney, James	Vice President	Vanguard Fiduciary Trust Company
Laursen, Amy M.	Vice President	Vanguard Fiduciary Trust Company
Ludt, Ryan E.	Vice President	Vanguard Fiduciary Trust Company

Maack, Andrew H.	Vice President	Vanguard Fiduciary Trust Company
MacBride, David	Treasurer	Vanguard Fiduciary Trust Company
Mahoney, Peter	Assistant Treasurer	Vanguard Fiduciary Trust Company
Malloy, Paul	Vice President	Vanguard Fiduciary Trust Company
Miller, Jodi	Vice President	Vanguard Fiduciary Trust Company
Morales Singh, Beth	Secretary	Vanguard Fiduciary Trust Company
Mosley, Armond	Vice President	Vanguard Fiduciary Trust Company
Nagar, Manish	Chief Information Security Officer	Vanguard Fiduciary Trust Company
Napier, Stephanie L.	Vice President	Vanguard Fiduciary Trust Company
Narayanan, Arvind	Vice President	Vanguard Fiduciary Trust Company
Newhall, Daniel W.	Vice President	Vanguard Fiduciary Trust Company
O'Reilly, Gerard P.	Vice President	Vanguard Fiduciary Trust Company
Perre, Michael	Vice President	Vanguard Fiduciary Trust Company
Petty, David	Chief Financial Officer	Vanguard Fiduciary Trust Company
Rollings, Michael	Vice President	Vanguard Fiduciary Trust Company
Saxena, Neena	Vice President	Vanguard Fiduciary Trust Company
Shaykevich, Daniel	Vice President	Vanguard Fiduciary Trust Company
Smolenski, Michael	Vice President	Vanguard Fiduciary Trust Company
Van Ommeren, David	Vice President	Vanguard Fiduciary Trust Company

VAI:

Director	Position	Entity
Benchener, Matthew J.	Chairman & Director	Vanguard Advisers, Inc.
Bisordi, John	Director	Vanguard Advisers, Inc.
Brancato, Matthew C.	Director	Vanguard Advisers, Inc.
Rampulla, Thomas M.	Director	Vanguard Advisers, Inc.
Risi, Karin A.	Director	Vanguard Advisers, Inc.
Rollings, Michael	Director	Vanguard Advisers, Inc.

Officer	Title	Entity
Bisordi, John E.	General Counsel and Vice President	Vanguard Advisers, Inc.
Bock, Barbara	Controller	Vanguard Advisers, Inc.
Buckley, Tara	Vice President and Assistant Secretary	Vanguard Advisers, Inc.
Burke, Claire	Chief Compliance Officer	Vanguard Advisers, Inc.
Cleborne, Jon	Vice President	Vanguard Advisers, Inc.
Corey, Danielle	Vice President	Vanguard Advisers, Inc.
Davis, Gregory	Vice President	Vanguard Advisers, Inc.

Jakubowski, Paul M.	Vice President	Vanguard Advisers, Inc.
Morales Singh, Beth	Secretary	Vanguard Advisers, Inc.
Muir, Amanda	Vice President	Vanguard Advisers, Inc.
Nagar, Manish	Chief Information Security Officer	Vanguard Advisers, Inc.
Petty, David	Chief Financial Officer	Vanguard Advisers, Inc.
Rampulla, Thomas M.	Vice President	Vanguard Advisers, Inc.
Risi, Karin A.	Vice President	Vanguard Advisers, Inc.
Williams, Massy	Vice President	Vanguard Advisers, Inc.
Alwine, Christopher W.	Vice President	Vanguard Advisers, Inc.
Benchener, Matthew J.	Vice President and Municipal Advisor CEO-Designee	Vanguard Advisers, Inc.
Brancato, Matthew C.	Vice President	Vanguard Advisers, Inc.
Brestowski, Amber	Vice President	Vanguard Advisers, Inc.
Buckley, Mortimer J.	President	Vanguard Advisers, Inc.
Concannon, Brian	Vice President	Vanguard Advisers, Inc.
MacBride, David	Treasurer	Vanguard Advisers, Inc.
Marisa, Mindi	Vice President	Vanguard Advisers, Inc.
Newhall, Daniel W.	Vice President	Vanguard Advisers, Inc.
Rollings, Michael	Vice President	Vanguard Advisers, Inc.
Saxena, Neena	Vice President	Vanguard Advisers, Inc.