

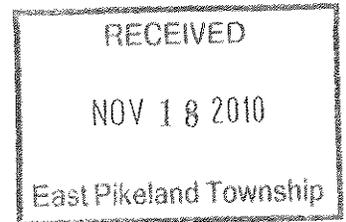


**AXA EQUITABLE**

redefining / standards

November 16, 2010

Kimberly Moretti  
Township Manager  
East Pikeland Township  
PO Box 58  
Kimberton, PA 19442



**Re: Act 44 Disclosure Form**

Dear Ms. Moretti:

Our AXA Advisors financial professional, David Babcock, forwarded to me your letter dated July 20, 2010, in which you ask that the Act 44 Disclosure Form be completed with respect to services performed with respect to the AXA Equitable contracts issued to participants in the Township's 457(b) plan.

Attached is that form, completed and signed by me as an authorized officer. If you need anything further, please let David or me know.

Sincerely,

Edna H Russo  
Vice President

cc: David Babcock

Disclosures by Current Contractors

1. Identify the municipal pension plans(s) for which you are providing information.

**East Pikeland Township 457(b) Plan**

2. Provide the names and titles of all individuals providing professional services to East Pikeland Township pension plan or plans identified above including advisors and subcontractors of the Contractor. 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.

**David Babcock – AXA Advisors Financial Professional. Provides financial and retirement services to employees of East Pikeland Township to assist them with opening and maintaining their 457(b) plan accounts.**

**Edna H Russo – VP, AXA Equitable. Provides support for AXA Advisors Financial Professionals with respect to contract and administrative coordination on behalf of their clients.**

- (a) List the names of any of the above individuals who are a current or former official or employee of East Pikeland Township and their position;

**None**

- (b) List the name of any of the above individuals who has been a registered Federal or Pennsylvania State lobbyist and the date of the most recent renewal/registration.

**None**

The information in this section must be updated in writing as changes occur.

3. Since December 17, 2009, have any of the individuals identified in paragraph 2 above been employed by East Pikeland Township?

**No**

- (a) If the answer is yes, please identify the individual, his/her position with the municipality and dates of employment.

4. Since December 17, 2009, has the Contractor employed or paid compensation to a third party intermediary, agent or lobbyist to directly or indirectly communicate with any individual on the List of Municipal Officials in connection with any transaction or investment involving the Contractor and the municipal pension system. This question does not apply to any officer or employee of the Contractor who is acting within the scope of the Contractor's standard professional duties on behalf of the Contractor including the actual provision of legal, accounting, engineering, real estate or other professional advice, services or assistance pursuant to its professional services contract with the municipal pension system.

**No**

5. Since December 17, 2009, has any agent, officer, director or employee of the Contractor solicited a third party to make a political contribution to any municipal official or candidate for municipal office in East Pikeland Township or to the political party or political action committee of that official or candidate?

**No**

- (a) If the answer is yes, please identify: the agent, officer, director or employee who made the solicitation; the individual or individuals who were solicited; and the municipal officials, candidates, political party or political committee for whom the solicitation was made.

6. Since December 17, 2009, has the Contractor made any contribution to a municipal official or candidate for municipal office in East Pikeland Township?

**No**

- (a) If the answer is yes, please identify the recipient, the amount, and the date of the contribution.

7. Does the Contractor have a direct financial, commercial or business relationship with any individual on the List of Municipal Officials?

**No**

- (a) With respect to every municipal official for which the answer is yes, identify that individual and provide a detailed written description of that relationship.

8. Since December 17, 2009, has the Contractor conferred any gift of more than nominal value to any individual on the List of Municipal Officials? A gift includes money, services, loans, travel, lodging, entertainment, discount, or other thing of value.

**No**

- (a) With respect to every municipal official for which the answer is yes, please identify the recipient, the gift, and the date it was conferred.

9. Did the Contractor make political contributions that meet all of the following four criteria: (i) The contribution was made in the last five years, specifically, since December 18, 2004; (ii) The contribution was made by an officer, director, executive-level employee or owner of at least five percent (5%) of the Contractor; (iii) The amount of the contribution was at least \$500 in the form of either a single contribution by an officer, director, executive-level employee, or owner of at least five percent (5%) or the aggregate of all contributions by all officers, directors, executive-level employees, and owners of at least five percent (5%); and (iv) The contribution was made to a candidate for any public office in the Commonwealth or to an individual who holds that office, or to a political committee of a candidate for public office in the Commonwealth or of an individual who holds that office.

**No**

(a) If the answer is yes, then the Contractor shall provide the following information: the name and address of the contributor; the contributor's relationship to the Contractor; the name and office or position of each recipient; the amount of the contribution; and the date of the contribution.

10. With respect to your provision of professional services to East Pikeland Township, are you aware of any apparent, potential or actual conflict of interest with respect to any officer, director or employee of the contractor and officials or employees of East Pikeland Township?

No

(a) If the answer is yes, please provide a detailed circumstances which you believe provide a basis to conclude or actual conflict of interest may exist. written explanation of the that an apparent, potential

**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 and provide an explanation of the steps taken to address this apparent, potential or actual conflict.**

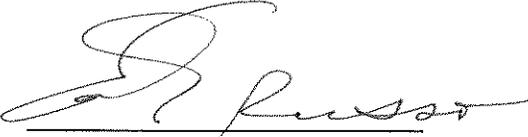
11. Please provide the name(s) and position(s) of the person(s) completing this Form. One of the individuals identified by the Contractor in paragraph 2 above must participate in completing this Form and must sign the below verification.

**VERIFICATION**

I, Edna H Russo hereby state that I am Vice President for AXA Equitable Life Insurance Company, and I am authorized to make this verification.

I hereby verify that the facts set forth in the foregoing Act 44 Disclosure Form for Entities Providing Professional Services to East Pikeland Township Pension System are true and correct to the best of my knowledge, information, and belief

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

November 16, 2010  
Date