

Act 44 Disclosure Form for Entities Providing Professional Services to East Pikeland Township Pension Plans

Introduction

Chapter 7-A of Act 44 of 2009 mandates the annual disclosure of certain information by every entity (hereinafter "Contractor") which is party to a professional services contract with one of East Pikeland Township's pension funds. East Pikeland Township has determined that the Act 44 disclosure requirements apply to Contractors who receive payment of any kind from an East Pikeland Township pension fund. You are expected to submit this completed form by December 1, 2011. 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 30, 2011.

Definitions for Disclosure Questions

The following definitions apply for answering the questions in this disclosure form:

Affiliated Entity: Any of the following: (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.

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. The term Contractor shall also include an Affiliated Entity of the Contractor.

Contributions: As defined in section 1621 of the act of June 3, 1937 (P.L. 1333, No. 320), known as the Pennsylvania Election Code.

Executive Level Employee: An employee of a contractor or the contractor's affiliated entity who: (1) can affect or influence the outcome of the contractor's or affiliated entity's actions, policies or decision related to pension and the conduct of business with a municipality or a municipal pension system; or (2) is directly involved in the implementation or development of policies relating to pensions, investments, contracts or procurement or to the conduct of business with a municipality or a municipal pension system.

Political Committee: As defined in section 1621 of the act of June 3, 1937 (P.L. 1333, No. 320), known as the Pennsylvania Election Code.

Professional Services Contract: A contract to which the municipal pension system is a party that is: (1) for the purchase or provision 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.

(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.

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?

(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?

(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?

(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.

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.

Mark J Sklar, Managing Director - Investment Officer.

VERIFICATION

I, Karen Sammartino, hereby state that I am a Market Compliance Specialist for Wells Fargo Advisors, 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.

Karen B. Sammartino

Signature

11/8/11

Date