

**STATE OF NEW JERSEY
DEPARTMENT OF THE TREASURY
DIVISION OF INVESTMENT**

**Disclosure Report of Political Contributions
by Investment Management Firm**

Pursuant to N.J.A.C. 17:16-4.6, promulgated by the State Investment Council (“Council”), each investment management firm seeking to provide investment management services to the State of New Jersey is required to disclose prior to engagement, on a form provided by the Division of Investment (the “Division”), all political contributions and payments to political parties made or paid by the firm, its parent company, or any other controlling person or entity, any investment management professional associated with the firm, any political action committee controlled by any of the above persons or entities, or any third party solicitor associated with the firm. Each investment management firm that is engaged by the Division is further required to make quarterly disclosures by the last day of the month following the end of each calendar quarter during the term of the engagement; provided, however, that no report is required for any calendar quarter in which the investment management firm has no additions or revisions to information that was already reported in a prior report. (All terms used in this form have the definitions set forth in the Appendix to this form.)

Name of Investment Management Firm: _____

Disclosure Report Period (check one):

Initial Report:

From: _____
(Two years prior to date of engagement)

Through: _____
(Date of engagement)

Quarterly Report:

From: _____
(First day of calendar quarter)

Through: _____
(Last day of calendar quarter)

Part 1: Designation of Investment Management Professionals

Please provide, in the table below, the names of those persons who qualify as “investment management professionals,” using the attached definition, and a brief description of the activities that cause such person to be an investment professional (e.g., investment manager, advisor/manager to investment management entity, financial advisor/consultant, client development, solicitation of business, supervisor, member of executive or management committee).

Attach additional sheets, if necessary.

Name of Investment Professional	Description of Activities
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	
11.	
12.	

Check here if there are no changes from the investment management professionals previously designated by the investment management firm:

Check here if investment management professionals are listed on a separate page:

Part 2: List of Political Contributions and Payments to Political Parties

Please provide the requested information in the following table with respect to all political contributions and payments to political parties made by:

1. The investment management firm, its parent company, or any other person or entity that controls the investment management firm;
2. Any investment management professional listed in Part 1;
3. Any third party solicitor associated with the investment management firm¹;
4. Any political action committee controlled by the investment management firm, its parent company, or any other entity that controls the investment management firm, or by an investment management professional of such investment management firm or controlling entity; or
5. Any individual or entity for the 12-month period prior to such individual or entity becoming an investment management firm, investment management professional or third party solicitor.

Political contributions made to State officials for whom the contributor was/is entitled to vote need not be reported, so long as such contributions did/do not exceed \$250.00 per State official per election. Payments to a political party need not be reported, so long as such payments did/do not exceed \$250.00 per political party per year. Political contributions and payments to a political party listed on an earlier Disclosure Report need not be restated on this Disclosure Report.

Attach additional sheets, if necessary.

Name and Address of Person or Entity Making Political Contribution or Payment to Political Party:	Name and Title of State Official or Political Party Receiving Political Contribution or Payment to Political Party:	Amount and Date of Political Contribution or Payment to Political Party:

Check here if contributions or payments are listed on a separate page:

¹ A third party solicitor shall include any “indirect” solicitor known to be compensated by the “primary” solicitor to solicit investment management business from the State or State official on behalf of the investment management firm.

Part 3: Exemptions from Disqualification Pursuant to N.J.A.C. 17:16-4.10

Pursuant to N.J.A.C. 17:16-4.10, an investment management firm that would otherwise be prohibited from being engaged to provide investment management services to the State under N.J.A.C. 17:16-4.3 shall be exempt from such prohibition if the investment management firm demonstrates in writing that: (1) the investment management firm discovered such contribution or payment (which contribution or payment did not exceed \$250.00) within four months of the date of contribution or payment and the contributor obtained a return of the contribution or payment within 60 calendar days of the date of discovery; or (2) the violation of N.J.A.C. 17:16-4 caused by such contribution or payment was unintentional and inadvertent, and the Council determines that the beneficiaries of the Pension and Annuity Funds, the State taxpayers, and the public are best served by an exemption.

Only one exemption is available for each investment management professional or third party solicitor (regardless of time period), and the investment management firm is entitled to no more than two exemptions in any 12-month period.

Please provide the requested information in the following table with respect to all exempt political contributions and payments to political parties.

Name and Address of Person or Entity Making Political Contribution or Payment to Political Party:	Name and Title of State Official or Political Party Receiving Political Contribution or Payment to Political Party:	Amount and Date of Political Contribution or Payment to Political Party:	Date of Discovery / Date of Return of Political Contribution or Payment to Political Party:	Date of Exemption:

Part 4: Information Regarding Third Party Solicitors

Please provide in the following table the name and business address of any third party solicitor, the services provided by the solicitor, the compensation arrangement between the investment management firm and the solicitor for such services, and the total dollar amount of payments made to the solicitor during the report period. The disclosure below should include any “indirect” solicitor known to be compensated by the “primary” solicitor to solicit investment management business from the State or a State official on behalf of the investment management firm.

Attach additional sheets, if necessary.

Name and Business Address of Solicitor:	Services Provided by Solicitor:	Summary of Terms of Compensation (indicate whether payment is made to primary or indirect solicitor):	Total Dollar Amount of Payments Made to Solicitor During Report Period:

Check here if third party solicitors are listed on a separate page:

Check here if supporting documentation is attached:

I hereby certify as an officer or authorized representative of the investment management firm identified below that such investment management firm has not either directly or indirectly, through or by any other person or any means whatsoever, done any act which would violate the provisions of N.J.A.C. 17:16-4.3 or 4.4. I further certify that, to the best of my knowledge and belief, the foregoing statements and disclosure made by me are true, accurate and complete. I am aware that if any of the statements are willfully false, I am subject to punishment.

Name of Investment Management Firm: _____

Signed: _____

Print Name: _____

Title: _____

Date: _____

Appendix

DEFINITIONS

For purposes of this Disclosure Report, the following words and terms shall have the following meanings, as provided in N.J.A.C. 17:16-4, unless the context clearly indicates otherwise:

“Control” means the power to exercise a controlling influence over the management or policies of an investment management firm or political action committee.

“Investment management firm” means one or more natural persons, corporations, partnerships or other entities, incorporated or unincorporated, that provide investment management services.

“Investment management professional” means:

1. Any person associated with an investment management firm who is primarily engaged in the provision of investment management services;
2. Any person associated with an investment management firm involved in client development or the solicitation of business from pension funds clients, including pension fund clients that are not State Pension and Annuity Fund clients;
3. Any person associated with an investment management firm who is a supervisor of any person described in 1 or 2 above, up through and including the Chief Executive Office or similarly situated official; or
4. Any person associated with an investment management firm, its parent company, or any other entity that controls the investment management firm, who is a member of the executive or management committee of such firm or controlling entity, or similarly situated officials, if any.

“Investment management services” means:

1. The business of making or recommending investment management decisions for or on behalf of a State Pension and Annuity Fund;
2. The business of advising or managing a separate entity which makes or recommends investment management decisions for or on behalf of a State Pension and Annuity Fund, including as general partner, investment manager or similar entity of an investment vehicle; or
3. The provision of financial advisory or consultant services to a State Pension and Annuity Fund.

“Payment” means any gift, subscription, loan, advance, or deposit of money or anything of value.

“Political contribution” means any gift, subscription, loan, advance, or deposit of money or anything of value made:

1. For the purpose of influencing any election for State office;
2. For the purpose of influencing any election for local office by a person who is also (i) a State official or (ii) an employee or advisor of either the State or a State official;
3. For payment of debt incurred in connection with any such election; or
4. For transition or inaugural expenses incurred by the successful candidate in any such election.

“Political party” means any political party or political committee organized in the State, including, without limitation, State legislative leadership committees, county committees, and independent committees. The term “political party” does not include a Federal or national campaign committee or a non-State political committee, even if such Federal or national or non-State political committee makes payments or contributions to which this subchapter would otherwise apply.

“State official” means any person (including any election or political action committee for such person) who was, at the time of the political contribution, an incumbent, candidate or successful candidate for Governor or for a seat in the Legislature. Communication with a State official includes communication with the employees and advisors of such official.

“Third party solicitor” means a third party placement agent or lobbyist who solicits investment management business through direct or indirect communication with a State officer, employee, or official on behalf of an investment management firm, but does not include any person whose sole basis of compensation from the investment management firm is the actual provision of legal, accounting, engineering, real estate, or other professional advice, services, or assistance. The term “third party solicitor,” when used with respect to a particular investment management firm, shall not include (i) a person that directly, or indirectly through one or more intermediaries, controls, is controlled by, or is under common control with, the investment management firm, (ii) a third party placement agent or lobbyist who solicits clients other than the Division to engage that investment management firm to provide investment management services, or (iii) a third party placement agent or lobbyist who solicits the Division on behalf of another investment management firm.