



HICKORY RIDGE COMMUNITY ASSOCIATION
Special Village Board Meeting Minutes
February 7, 2022, 7:30 pm via Zoom meeting

Meeting Recording:

https://us02web.zoom.us/rec/share/Aqvl3dJ1aFqlygnBfFtujQJoxG9cRf_-ntW7YpF9v7xguxPj1mzKQPk0Xa8dxnPi.UM4cHo1V8Wx-RXbx

Members Present: Lisa Dean, Skye Anderson, Kristine Amari, Deb McPherson, Janssen Evelyn and Jessamine Duvall

Staff Present: Laura Parrish and Emily Rieger

Guests: About 28 guests

Call to Order: 7:03pm

- 1. Approval of Agenda:** Ms. Anderson recommended that item 6.A. be broken into its component parts so that residents may comment on each item. Ms. Dean moved to approve the agenda as submitted. Ms. Amari seconded. The agenda was approved as submitted, Ms. Dean, Ms. Amari and Ms. McPherson for and Mr. Evelyn and Ms. Anderson against.
- 2. Approval of January 24th Meeting Minutes:** Ms. Parrish requested an edit to 6.b. and Ms. Anderson requested that, going forward, if a Board member states a reason for their vote on an issue, that the reason will be stated in the minutes for the meeting. Ms. Dean asked that Mr. DesRoches' verbatim comments from the meeting be added as an attachment to the minutes. Mr. Evelyn moved to approve the minutes as amended and Ms. Dean seconded. The amended minutes were approved unanimously.
- 3. Board Update:** Ms. Amari stated that tonight's efforts are worthy and will prevent outside influence. Ms. Anderson urged civility in the meeting chat.
- 4. Village Voices:** Ms. Schwartz was the Vice Chair of the Special Committee on Election Policy and Procedures and she stated that there were six public meetings of the Committee, recorded and available for residents to view, during which the Committee observed a full, public comment process. The Committee heard and reviewed residents' concerns repeatedly. Ms. Schwartz also observed that Board members Anderson, Duvall and Evelyn did not consider the majority of views of residents that opposed the KIMCO redevelopment during their prior Board terms, so their incorrect claims now that the Special Election Committee did not thoroughly consider resident input is concerning. Ms. Schwartz's full comments are attached. Mr. Gardiner stated that he has gained an understanding of how much influence corporations have in the community. The proposed changes for tonight need to be made. He stated that the campaign expenditure limit should be reduced from \$500 to maybe \$100. Mr. DesRoches stated that people are undermining the integrity of the election process and undermining public confidence in the Village elections. The Special Committee has provided ways to prevent this from happening again. These recommendations will allow volunteers to serve the community, not their personal interests or for personal gain. Mr. Schwartz said that both the Special Committee meetings and the Village Board meetings are open and public, and all meetings allow time for resident comment. Mr. Schwartz feels it is important to ask all to disclose any contributions from outside interests. Mr. Loesch stated that he abstained from voting on the Special Committee documents because it was a take all or leave all vote. In some instances, he could not support all of the documents. Dr. Chaiken stated that he felt some have misrepresented the work of the committee. The Committee spent time reviewing written comments and considered with care feedback from residents. Dr. Chaiken stated that adoptions of the documents would increase confidence and protect integrity of the election process. Mr. Inglis stated that the Special Committee developed ways to keep corruption out of the election and the recommendations should be adopted. Ms. Donahue said that she appreciated the work of the Special Committee, but she did not see documentation to prove the innuendos of outside influence and she is disappointed that the process was not made available for broad participation. Ms. Donahue's complete comments are attached.
- 5. CA Board of Directors Report—Jessamine Duvall:** Ms. Duvall stated that she will make an official report at the meeting on Monday, February 14, 2022. Ms. Duvall made a motion that this meeting be a work session and that no votes happen at this meeting. She proposed going item by item to discuss and then the votes would happen at the Board meeting on Monday, February 14, 2022. Ms. Anderson seconded. The motion failed, Ms. Anderson and Mr. Evelyn for, Ms. Dean, Ms. Amari and Ms. McPherson against.

6. **New Business:** Ms. Dean reminded Board members and the public about the careful deliberations of the Special Committee and the Village Board on the campaign reform issues being considered. The Committee and Board thoughtfully considered and discussed the extensive written and verbal input of residents. There were extended comment periods to provide opportunities for residents to weigh in in writing and every resident had the opportunity to speak for up to 54 minutes over 12 public meetings. Residents made oral comments at least 51 times and submitted 26 pages of written comments. Their comments were considered, and many were incorporated into the revised documents and reflected in the final Board motions. The proposed documents, policies and procedures were edited by both the Special Committee and before Board review, based on comments made by residents.

a. Continuation of Consideration and Action on Committee Recommendations and Documents (including rescission of unenforceable motion regarding Bylaws amendment):

- i. **Question 13:** The Board discussed the recommendation of the Special Committee. Ms. Dean made the motion That the Board adopt the Special Committee’s recommendation on Question 13; and that effective with the 2022 Village elections and continuing thereafter, the Election Committee will annually report on the recently-concluded elections to the Board; and that the Election Committee’s report will be presented in an open public meeting of the Board no later than the second meeting in June following the recently-concluded elections; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed unanimously.
- ii. **Question 14:** The Board discussed the recommendation of the Special Committee. Ms. Dean made the motion that the Board adopt the Special Committee’s recommendation on Question 14; and that effective with the 2022 Village elections and continuing thereafter, that notice of second meeting for quorum purposes be published with first notice of election; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. Amari seconded. The motion passed unanimously.
- iii. **Question 15:** The Board discussed the recommendation of the Special Committee. Ms. Dean made the motion that the Board adopt the Special Committee’s recommendation on Question 15; and that effective with the 2022 Village elections and continuing thereafter, Village Staff, after consultation with the Election Committee members, shall establish and document protocols for the announcement and advertising of election results; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed unanimously.
- iv. **Question 16:** The Board discussed the recommendation of the Special Committee. Ms. Dean made the motion That the Board adopt the Special Committee’s recommendation on Question 16; and that effective with the 2022 Village elections and continuing thereafter, the Village staff shall create and produce a comprehensive Election Handbook setting forth all procedures, rules, guidelines, forms, timelines, maps, and other documents related to Village elections; and that the Election Handbook will document all policies and documents related to candidacy, elections, and certification of winning candidates adopted by the Board; and each year after the Election Committee makes its annual report to the Village Board in June, Village staff and the Election Committee shall review the Election Handbook and suggest updates and revisions to the Board for its consideration and adoption; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents shall be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed unanimously.
- v. **Question 18:** The Board discussed the recommendation of the Special Committee. Ms. Dean made a motion that the Board adopt the Special Committee’s recommendation on Question 18; and that effective with the 2022 Village elections and continuing thereafter, Village staff, in consultation with the Election Committee, shall establish a timeline for establishing eligibility for each candidate for Director and each candidate for Columbia Association Representative, and shall review that timeline annually at the same time the Election Handbook is reviewed each year; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents be revised and/or created to clearly reflect the foregoing. Ms. Amari seconded. Ms. Anderson recommended a friendly amendment to the motion to “establish a timeline for determining” rather than “establish a timeline for establishing.” Ms. Amari seconded the friendly amendment. The motion passed unanimously. The amended motion is: that the Board adopt the Special Committee’s recommendation on Question 18;

and that effective with the 2022 Village elections and continuing thereafter, Village staff, in consultation with the Election Committee, shall establish a timeline for determining eligibility for each candidate for Director and each candidate for Columbia Association Representative, and shall review that timeline annually at the same time the Election Handbook is reviewed each year; and that the Election Procedures and Guidelines, the instructions to candidates, and other relevant documents be revised and/or created to clearly reflect the foregoing.

- vi. **Question 19:** The Board discussed the recommendation of the Special Committee. Ms. Dean made a motion that the Board consider the Special Election Committee's definition of recusal as it considers adoption of the Village Conflict of Interest Policy. Definition: "Disqualification or withdrawal (of oneself or someone else) from any position of judging or decision making to avoid a semblance of personal interest or bias." Ms. Amari seconded. The motion passed, Ms. Dean, Ms. Amari and Ms. McPherson for, Ms. Anderson and Mr. Evelyn against.
- vii. **Candidate Acknowledgement of Receipt document:** Board members discussed and edited the document. Ms. Parrish saved the edited document for the record. Ms. Dean made a motion that the Board adopts the Acknowledgement of Receipt as edited; and that effectively immediately, the policies and procedures reflected therein are the policies of this Board and shall be implemented beginning with the 2022 Election cycle and continue thereafter; and that Election Procedures and Guidelines, instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed, Ms. Dean, Ms. McPherson, Ms. Amari and Ms. Anderson in favor, Mr. Evelyn against. Mr. Evelyn stated this document should not have been done at the beginning because it lists other documents that have not been approved and the document could be confusing.
- viii. **Contributions and Expense Report document:** Board members discussed and edited the document during the discussion. Ms. Parrish saved the edited document for the record. Ms. Dean made a motion that the Board adopts the Contributions and Expense Report document as edited; and that effectively immediately, the policies and procedures reflected therein are the policies of this Board and shall be implemented beginning with the 2022 Election cycle and continue thereafter; and that Election Procedures and Guidelines, instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. Amari seconded. The motion passed, Mr. Evelyn, Ms. Amari, Ms. McPherson and Ms. Dean for, Ms. Anderson opposed. Ms. Anderson believes that the document is too complex for the average person who would like to run for the Village Board.
- ix. **Candidate Disclosure document:** Board members discussed and edited the document during the discussion. Ms. Parrish saved the edited document for the record. Ms. Dean made a motion that the Board adopts the Candidate's Disclosure document as edited; and that effectively immediately, the policies and procedures reflected therein are the policies of this Board and shall be implemented beginning with the 2022 Election cycle and continue thereafter; and that information disclosed will be posted on the website and otherwise easily available to all eligible voters: and that Election Procedures and Guidelines, instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed, Ms. Dean, Ms. Amari and Ms. McPherson for, Ms. Andersen against because she feels the document needs to be simplified. Mr. Evelyn abstained.
- x. **Campaign Pledge document:** Board members discussed and edited the document during the discussion. Ms. Parrish saved the edited document for the record. Ms. Dean made a motion that the Board adopts the Candidate's Pledge as edited; and that effective immediately, the policies and procedures reflected therein are the policies of this Board and shall be implemented beginning with the 2022 Election cycle and continue thereafter; and that Election Procedures and Guidelines, instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. McPherson seconded. The motion passed, Ms. Amari, Ms. McPherson and Ms. Dean in favor, Mr. Evelyn and Ms. Anderson against. Ms. Anderson stated that the document is too detailed and complex; she feels it needs to be simplified.
- xi. **Conflict of Interest document:** Board members discussed and edited the document during the discussion. Ms. Parrish saved the edited document for the record. Ms. Dean made a motion that the Board adopts the Conflict of Interest Policy as edited; and that effectively immediately, the policies and procedures reflected therein are the policies of this Board and shall be implemented beginning with the 2022 Election cycle and continue thereafter; and that Election Procedures and Guidelines, instructions to candidates, and other relevant documents be revised and/or created to reflect the foregoing. Ms. Amari seconded. The motion passed, Ms. McPherson, Ms. Amari, Ms. Dean and Mr. Evelyn in favor, Ms.

Anderson against. Ms. Anderson objected to the document because it is too detailed and complex for the average person.

- xii. **Friendly amendment to motion made at January 24, 2022 meeting, Question 10:** On advice of counsel that the Board cannot forcibly recuse a member; members must recuse themselves, Ms. Dean recommended that the Board made a friendly amendment to this motion: That contributions from third-parties (defined as individuals or entities other than the candidate themselves) to Winning Candidates will require a review by the Board of Directors to determine whether such contribution constitutes a conflict of interest or an appearance of a conflict of interest [*this wording removed: requiring such Winning Candidate to be recused*] **prompting consideration of asking the subject Board member to recuse themselves** from discussion and voting on a matter before the Board and involving the third-party donor; and that the Association’s Conflict of Interest Policy, instructions to candidates, and other relevant documents be revised and/or created to clearly reflect the foregoing. The Board made a friendly amendment (*removed in italics, added in bold*) to this motion and the amendment is reflected in the above. The amendment passed, Ms. Dean, Ms. Amari, Ms. McPherson and Mr. Evelyn in favor and Ms. Anderson abstained. The final approved motion for Question 10 is: That contributions from third-parties (defined as individuals or entities other than the candidate themselves) to Winning Candidates will require a review by the Board of Directors to determine whether such contribution constitutes a conflict of interest or an appearance of a conflict of interest prompting consideration of asking the subject Board member to recuse themselves from discussion and voting on a matter before the Board and involving the third-party donor; and that the Association’s Conflict of Interest Policy, instructions to candidates, and other relevant documents be revised and/or created to clearly reflect the foregoing.
- xiii. **Friendly amendment to motions made on Special Committee Questions 7, 8 and 9 at the January 24, 2022 meeting:** Ms. Dean recommended, in order to make the language of the motions made at the previous meeting consistent, that the following be added to the motions regarding questions 7, 8, and 9: “and other relevant documents be revised and/or created to reflect the foregoing.” The friendly amendment passed unanimously.
- xiv. **Rescind 2nd motion on Question 2 at the January 24, 2022 meeting regarding adding language in the Bylaws to require Board members to be members of the Association:** Ms. Dean moved, on advice of counsel, that the following motion on Question 2 made at the January 24, 2022 meeting be rescinded: “The term of a Board Member or Columbia Association Representative should automatically terminate when they cease to be a member of the Association. This would necessitate a change to the Bylaws that would go to the residents for a vote on the ballot for the upcoming election.” The motion passed unanimously.

7. **Board Comments:** There were no Board comments.

8. **Feedback Session:** There were no resident comments.

9. **Action Items:**

- a. Ms. Parrish will add Ballot Harvesting and Negative Campaigning in the Election Process to the agenda for the February 14, 2022 meeting.
- b. Ms. Parrish will check the documents to ensure that definitions are consistent.

10. **Adjournment:** The meeting was adjourned at 12:00 am.

February 7, 2022 Special Village Board Meeting - Resident Speak-out Message

I served as Co-Chair of the Special Election Committee that was appointed by the Village Board to review matters that related to the issues surrounding our elections, candidacy requirements, disclosures of contributions, and spending. We had 6 public meetings to discuss these matters and allowed residents to speak during these meetings. The meetings were recorded so residents could later listen. Thus, there was a full public process.

Tonight, you will be voting on the documents my subcommittee prepared that were approved by the entire Committee. These documents were posted to residents repeatedly for them to comment. My subcommittee reviewed all the comments and made modifications where appropriate. The full Committee met on Jan 5th and approved these documents which were then submitted to the Village Board on Jan 8th.

I am speaking now because I am appalled at the constant outcry, not only at our Election Committee meetings but consistently at the last few Board meetings by Ms. Anderson, Ms. Duvall and Mr. Evelyn that we need to hear what the residents have to say. We did! Repeatedly! So that is an inappropriate criticism! More important, this concern over needing to delay the consideration of these election issues so Village Board members can "listen to residents" was not the policy of the old Village Board in 2020 and 2021, on which the three of you served. In fact, those Board members did not listen to over 350 residents who asked the Board to oppose KIMCO when there were only a handful supporting KIMCO. That is the reason that the three people who now serve as Village Board members, Lisa Dean, Deb McPherson and Kristine Amari were elected by an overwhelming vote. I also note that Ms. Anderson, Ms. Duvall and Mr. Evelyn have voted almost consistently against what the Special Election Committee is trying to accomplish. The purpose of what we are trying to achieve is to establish fair election rules and keep money from business interests out of our village elections. As I have witnessed throughout the Village Board meetings since Jan 8th, Ms. Anderson, Ms. Duvall and Mr. Evelyn have often been against our 6 documents which contain, the Conflict of Interest policy and financial disclosure forms. I am now wondering why? Why are the three of you so strongly against these important documents? I also want to understand why some supposedly interested residents have been vocally critical of the Committee's work. To my recollection, they were not interested or involved during the 5 years of the KIMCO zoning case. Why are these documents so distasteful to these residents?

Our subcommittee spent hours on research and development of the documents. We did not pull this information out of the sky. We went to other Home Owner Associations such as Chevy Chase and other sources to put together documents that would reflect what we felt is best for this community in keeping big money out of our elections.

In closing, I hope the Village Board will approve these much needed documents for the benefit of our Community. Thank you for listening.

Rhona Schwartz

S. Donahue Final comments re: special election committee documents presented to Hickory Ridge Village Board 7 February 2022

Believe it or not, I appreciate the work done by the committee in such a short period of time and with very little guidance....

I looked at all these documents for a long time – I'm also looking at a lot of comments that are being thrown around here tonite about people using deception to “undermine elections”, that there are “real threats to our process...”, “sowing seeds undercover...”, “illegally infringing on our rights....with ulterior motives...” These are crazy unsubstantiated accusations. There has been no documentation presented anywhere to prove this public innuendo, all the things that all these paper/documents are *supposedly* solving. There's no viable authentication that's been offered to justify all this “hoop-jumping” and the process has *not* been improved to encourage broad participation and representation.

Among all of the items for which is candidate is responsible that are delineated in these proposals, there are qualifications that are being ignored – is the candidate current with CA dues, with State & Federal Taxes, (alimony, child support etc.) – Is this village really in favor of allowing fiscal responsibility to a fiscally irresponsible person – to be part of the fiscal policy board?

This focus on prohibited entities - who's brother's son is married to whom - is a smokescreen. The campaign pledge speaks to independent expenditures as *“a website, newspaper, sign, billboard, TV or direct mail advertisement that expressly advocates for the election or defeat of my candidacy, and is not made in consultation or cooperation with me, or at my request or suggestion.... I agree to*

make reasonable and good faith efforts to discover the source of any such Independent Expenditure and its fair market value..."

Needing to investigate something that's against a candidate? Is this suggesting that a candidate must determine the fair market value of a positive or negative post on FaceBook or NextDoor? Really? I'd like to see how that will happen?

Also, where is the discussion of write-in candidates? Suppose someone does not file all these forms and garners the most votes? - is the Village and election committee going to ignore the will of the voting residents?

I've asked this early on and I will ask once more – what issues beyond uncorroborated and unproven public innuendo are being solved by all this paperwork?

Acknowledgement of Receipt of Documents

HICKORY RIDGE COMMUNITY ASSOCIATION, INC,

Candidate's AcknowledgementTo be *completed by each applicant* for candidacy.To be submitted *at the time of Candidate's Statement submission*.1. Candidate's Statement Acknowledgment

I agree and acknowledge that in order to qualify as a candidate in the 20__ Hickory Ridge Village Association ("Association") election, I am required to:

- (a) Be a member of the Association, and
 (b) Submit a *Candidate's Statement* consisting of the following three parts, each of which must be completed and submitted together no later than 5:00 p.m. on _____, 20__:
- 150-word Personal Campaign Statement
 - Candidate Disclosure Statement
 - Campaign Pledge

2. Candidate's Handbook

I acknowledge that I have received and read a copy of the Association's:

- *Candidate's Handbook* setting forth information and requirements related to applying for candidacy, the election process, the governing election guidelines and procedures, and the certification of a winning candidate's election. The Candidate's Handbook includes the current *Conflict of Interest Policy* and the current *Election Guidelines and Procedures* describing the governing election guidelines and procedures.
- A copy of the *Contribution and Expense Report*, which winning candidates are required to complete and submit as a condition to their election certification.

Print first and last name: _____

Signature: _____

Date: _____

Candidate for: _____ Village Board _____ Columbia Association Representative

Address: _____

Email: _____ Phone: _____

FOR USE BY VILLAGE OFFICE ONLY:

Received Date: _____

Village Manager/Staff: _____

HICKORY RIDGE COMMUNITY ASSOCIATION, INC.

Campaign Pledge

This Campaign Pledge is part of the Candidate’s Statement and is to be *completed by each applicant* for candidacy. Completed Campaign Pledge is required to be submitted *at the time of Candidate’s Statement submission*.

Purpose. Purposes of this Pledge include removing barriers to full participation by candidates and voters in Hickory Ridge Community Association, Inc. (“Association”) elections and promoting diversity, equity and inclusion in Association elections and their outcomes through (a) equalizing the relative cost of a candidate’s election campaign so participation is within reach of all Association members; (b) equalizing the relative ability of Association members to affect the outcome of Association elections; and (c) promoting transparency of Association campaigns and elections.

Who is required to submit Pledge, When and Where. This Pledge is one of the three parts of the *Candidate’s Statement*, all of which together are to be completed and submitted by each applicant for candidacy no later than 5:00 p.m. on _____, 20__ via email to manager@hickoryridgevillage.org.

PLEDGE

I am a member of the Association and an applicant for candidacy to serve in elected office representing Association residents. In connection with my candidacy and campaign for the 20__ Association elections, I hereby pledge and agree that, to the best of my ability and after exercising reasonable and good faith due diligence:

1. No more than \$50 Contribution from Any Contributor. I will not accept from any individual or Entity, any contribution to my campaign that exceeds \$50 in the aggregate (including Monetary and In-kind contributions) from any such individual or Entity.

For purposes of this Pledge, “**Entity**” is defined as any entity or group, including without limitation any corporation, partnership, company, limited liability company, club, organization, governmental unit or instrumentality, or other combination of individuals having collective capacity to act, whether legally formed or not, including their agents or representatives.

For purposes of this Pledge: **Contribution** means anything of value given, loaned, utilized, advanced, or expended to influence a Candidate’s election or defeat of a Candidate’s opponent. A Contribution includes, but is not limited to, any:

- Monetary Contribution, defined as a Contribution of money in the form of cash, check, credit card, loan, forgiveness of debt, or other transfer (for example, PayPal or cryptocurrency).
- In-kind Contribution, defined as:
 - a. Any Contribution of goods, services, or real or personal property, including a discount on any of the foregoing that is not offered to the general public.

- b. Any payment by a Person other than the Candidate for goods, services, or real or personal property (including loan or use of any of the foregoing) made (a) for the purpose of influencing the Candidate's election and (b) with the Candidate's knowledge and with the Candidate's consent, cooperation, consultation, coordination, request or suggestion. (Examples: A Person, other than the Candidate, supplies and installs billboard signs to influence the Candidate's election. The Candidate does not pay for the signs, the signs are not given directly to the Candidate, but the Candidate has knowledge of and consulted with the Person. The fair market value of the signs and their installation is a reportable In-Kind Contribution.)
- c. Candidate's out-of-pocket Expenses
- d. Contribution of any Campaign Material. "Campaign Material." means any material that: contains text, graphics, or other images; relates to a Candidate; and is published or distributed. Campaign Material includes, but is not limited to: material transmitted by or appearing on the internet or other electronic medium; and an oral commercial campaign advertisement.

Contribution of a volunteer's time consisting solely of canvassing on behalf of a candidate shall not be considered an in-kind Contribution and is not reportable.

2. No Contributions from Prohibited Parties. Furthermore, to the best of my knowledge after exercising good faith due diligence, I will not accept any contribution of any kind (including monetary, property, goods, service, or otherwise) in any amount from any Prohibited Party.

For purposes of this Pledge, "**Prohibited Party**" means any individual or Entity currently (a) engaged in any business activities that involve, directly or indirectly, the Association or the Columbia Association, or (b) engaged in any matter in which the Association or, to my knowledge, the Columbia Association is an interested party.

In furtherance of this provision, the Association will maintain on its website a publicly-available list of any individual or Entity that (a) is engaged in any business activity that involves, directly or indirectly, the Association, or (b) is engaged in any matter in which the Association or the Columbia Association is an interested party.

3. No more than \$250 total in Campaign Contributions. I will not accept more than \$250 in contributions (aggregate of all monetary and in-kind contributions) from all sources combined, including any individual, Entity, and my own personal funds.
4. No more than \$250 in Campaign Expenditures. I will not spend, borrow, nor otherwise incur campaign and/or candidacy expenses in excess of \$250 total.
5. No Contributions from Anonymous Contributors. I will not accept any contribution whatsoever from any anonymous source.
6. Known Third Party Campaign Expenditure or Activity. I understand and agree that if any individual or Entity, for the purpose of influencing my election, does not make a contribution directly to me, but:

(a) contributes, pays, owes, or incurs any expense for goods, services, or real or personal property; and/or

(b) performs services or uses goods or real or personal property, or otherwise provides "In-Kind Contributions" (as defined in the Association's Contributions and Expense Report Instructions) in connection with my candidacy or election

and does so with my knowledge and with my written or oral consent, cooperation, consultation, coordination, request or suggestion, then I must report such expense on my *Contribution and Expense Report* as both (i) a contribution subject to the \$50 per individual or Entity contribution limit, and (ii) as an expense, subject to the \$250 limit on expenditures, regardless of whether or not the contribution, payment, performance or use was made directly to me or on my behalf.

The foregoing shall not be construed to permit me to accept any contribution from any Prohibited Party in any amount or value.

7. Independent Expenditure. An "Independent Expenditure" is an expenditure for any Campaign Material or other communication, such as a website, newspaper, sign, billboard, TV, door hangers, fliers, brochures, or direct mail advertisements that expressly advocates for the election or defeat of my candidacy, and is not made in consultation or cooperation with me, or at my request or suggestion.

In the event I become aware of any Independent Expenditure, then I agree to make reasonable and good faith efforts to conduct reasonable due diligence to discover the source of any such Independent Expenditure and its Fair Market Value.

For purposes of this Pledge, "**Fair Market Value**" means the value of goods (such as equipment, supplies, and use of facilities) valued at their normal purchase or rental price; services (such as advertising, printing or consulting) valued at the prevailing commercial rate at the time the services are rendered (*i.e.*, the amount that was paid or would have been paid for the services); and discounts valued at the amount discounted (*i.e.*, the difference between the usual and normal charge and the amount paid).

Regardless of my ability to identify the source of any Independent Expenditure, I agree to report its existence and Fair Market Value on my *Contribution and Expense Report*.

8. Report of Contributions and Expenditures. In the event I am notified by the Election Committee Chair or Association staff that I received sufficient number of votes to be elected to the office I seek, I agree to complete and submit a *Contribution and Expense Report* via email to manager@hickoryridgevillage.org **within 48-hours** of such notification. I acknowledge that timely submission of my *Contribution and Expense Report* is a condition to certification of my election by the Election Committee Chair, and that if I fail to submit the Report within 48-hours, I understand my election **will not be certified and I will not be seated for the office for which I was**

elected.

9. Violation of Pledge: Return of Contributions. If, even after exercising reasonable and good faith due diligence, I am made aware that I have accepted any contribution(s) in violation of this Pledge, then I will return any and all such contribution(s) (including the dollar amount of the Fair Market Value of any in-kind contribution(s) made in violation of this Pledge) to the contributor immediately upon being made aware of such violation.

10. Violation of Pledge: Action by Board. If, even after exercising reasonable and good faith due diligence, I knowingly violate this Pledge, I agree that the Hickory Ridge Village Association, Inc. Board of Directors may take such action as they deem appropriate, including, but not limited to (a) requiring I return all contributions accepted in violation of this pledge; (b) a public reprimand or public censure (including, to the extent practical, a permanent posting of such reprimand or censure on the Associations' website, in the *The Log* newsletter, and on the Association's Facebook and Twitter); (c) refusing to certify my election, and/or or (d) requesting I resign or requesting I recuse myself from the discussion and vote on any matters giving rise to such violation and before the Association; and/or (e) calling for a vote of the Association members to remove me from office.

By my signature below, I hereby agree to fulfill each and every provision of this Pledge to the best of my ability and to use reasonable and good faith efforts in doing so.

Print first and last name: _____

Sign first and last name: _____

Date: _____

HICKORY RIDGE COMMUNITY ASSOCIATION, INC.**Conflict of Interests Policy**

Purpose. The purpose of this Conflict of Interests Policy is to (i) guard against improper influence, (ii) set minimum standards for the ethical conduct of the Association's business, and (iii) protect the interests of the Hickory Ridge Community Association, Inc. as a tax-exempt entity.

Definitions. As used in this Conflict of Interests Policy, the following words shall have the following meanings:

"Association" means the Hickory Ridge Community Association, Inc.

"Board Committee" means any committee of the Board with decision making powers delegated by the Board of Directors.

"Board" means the Board of Directors of the Association, and includes all Directors of the Association, as well as the Columbia Association Representative, who is an ex officio member of the Board of Directors.

"Compensation" includes direct and indirect remuneration, as well as gifts or favors that are exceed \$50.00.

"Conflict of Interest" Among other things, a conflict of interest occurs when a member of the Board, officer, or key employee is in a position to influence the Association, its activities and decisions and such individual or a member of the individual's Family (defined below) may benefit personally or financially in some way from a transaction, decision, action, or relationship involving the Association. Conflict of interest includes but is not limited to, circumstances involving consideration of a matter or entering into a transaction, contract, or arrangement between the Association (and if Columbia Association Representative, the Association and/or the Columbia Association) and a person having a Financial Interest or engaging in a Prohibited Activity.

"Family" of an individual means his spouse, his brothers and sisters (whether by the whole or half-blood), parents and their spouses, children, and the spouses of children.

"Financial Interest" means an interest held by a person who, directly or indirectly, through business, investment, or family relationship has:

- a. An ownership or investment interest (other than ownership of shares in a publicly-traded mutual fund) in any person or entity with which the Association (and if Columbia Association Representative, the Association and/or or the Columbia Association) has a transaction, contract, or arrangement;
- b. A compensation arrangement with the Association (and if Columbia Association Representative, the Association and/or the Columbia Association) or with any entity or individual with which the Association (and if Columbia Association Representative, the Association and/or the Columbia Association) has a transaction, contract, or arrangement;
- c. A potential ownership or investment interest in or compensation arrangement with any entity or individual with which the Association (and if Columbia Association Representative, the Association and/or the Columbia Association) is negotiating a transaction, contract or arrangement; or
- d. A compensation arrangement with any entity or individual having a matter before or under consideration before the Board (and if Columbia Association Representative, the Association and/or the Columbia Association).

A Financial Interest is not necessarily a Conflict of Interest. A person who has a Financial Interest does not have a Conflict of Interest if the Board determines that a Conflict of Interest does not exist.

"Interested Person" means any (i) member of the Board, (ii) principal officer, (iii) key employee, or (iv) member of a Board committee with decision making powers delegated by the Board, who has a direct or indirect Financial Interest.

"Sanctions" includes, but is not limited to (a) a public reprimand or public censure (including, to the extent practical, a permanent posting of such reprimand or censure on the Associations' website, in the Association's newsletter, and on the Association's Facebook and Twitter); (b) requesting the violator recuse themselves from the discussion and vote on any matters giving rise to such violation, (c) requesting the resignation of the violator, and/or (d) calling for a vote of the Association members to remove the violator from office.

A. Policy

It is the policy of the Association to prohibit any member of the Board, Resident Architectural Committee ("RAC"), Architectural Committee ("AC"), and member of any other Board committee from voting on or participating in any matter which would create a conflict of interest or give the appearance of a conflict of interest, except when such vote or participation is in the exercise of an administrative duty which does not affect the disposition or decision with respect to that matter.

Because it is impossible to describe all situations which may constitute or give the appearance of a Conflict of Interest, the prohibitions included in this Policy are not intended to be exhaustive or all-inclusive.

Members of the Board and its committees, and Association staff have the duty to disclose any Conflict of Interest immediately upon becoming aware of a real or potential conflict, and no later than the time such matters come before the Board.

B. Construction and Implementation

The provisions of this Policy are intended to be broadly construed in accordance with the purpose of this Policy.

The Board shall be responsible for implementing this Policy and advising persons as to their application.

This policy is intended to supplement, but not replace (i) any applicable state and federal laws governing conflicts of interests applicable to nonprofit and charitable organizations, or (ii) any provisions of the Association's Articles of Association or Bylaws. If any of the terms of this Policy are inconsistent with applicable state or federal laws, the terms of the governing law shall prevail.

C. Sanctions

Upon determining a Violation (as defined in Paragraph F below) exists under any provision of this Policy, to the extent allowed by law, the Board may impose Sanctions in its discretion as authorized in this Policy, the Association's Articles, the Association's Bylaws, or as otherwise permitted by law.

D. Prohibited Activities

1. Participation and Voting. Except in the exercise of an administrative duty which does not affect the disposition or decision on a matter, no member of the Board or its committees shall participate in or vote on any matter before the Board:
 - a. In which the Board or committee member has a personal interest tending to impair the member's independence of judgment; or
 - b. In which a Board or committee member, his/her spouse, parent, minor child, brother or sister has a personal or business interest.

2. Restrictions. No member of the Board or its committees may:
 - a. One Year Prohibition. Within one year following termination of their term, assist or represent another party for Compensation in a case, contract or other specific matter involving the Association or under consideration by the Board if that matter is one in which the member significantly participated while affiliated with the Association;
 - b. Gifts. Solicit or accept any gift for personal benefit from any person or entity who (i) would be affected by the member's vote on a pending or proposed matter, or (ii) that has or is negotiating a contract with the Association;
 - c. Solicitation of Business. Solicit business from any person or entity who would be affected by the member's vote on a pending or proposed matter, or who has or is negotiating a contract with the Association; or
 - d. Confidential Information. Disclose or use confidential information acquired by reason of their position as a member of the Board or its committees for their own gain or that of another.

3. Employment; Participation in Compensation Matters. A member of the Board or its Committees, or their immediate family members, may not receive, directly or indirectly, any payment for services rendered or serve as a paid employee of the Association without prior approval of the Board. In the event that such approval is given, the affected member of the Board or its committees who receives Compensation, directly or indirectly from the Association (and if Columbia Association Representative, the Association or the Columbia Association) for services is precluded from participating or voting on any matters pertaining to that member's Compensation.

E. Waiver of Prohibition

Upon resolution of the Board passed by a majority vote upon, the Board may waive any provision of Section D (Prohibited Activities), may authorize a Prohibited Activity, and may authorize participation on a matter before the Board if:

1. The Board determines there is an extraordinary circumstance justifying waiving the Prohibited Activity;
2. The prohibition on participation leaves the Board or any of its committees with less than a quorum capable of acting;
3. The Board or any of its committees is required by law to act, or if the Board or any of its committees is the only one authorized to act.

F. Procedures Regarding Policy Violation and Enforcement.

1. Disclosure. Each member of the Board and its committees has the duty to disclose:
 - a. Any Financial Interest the member has;
 - b. Any actual or potential Conflict of Interest at the time such matters come before the Board or Association, or, if currently pending or under consideration by the Board or Association, immediately upon joining the Board or one of its committees;
 - c. Any Prohibited Activity immediately becoming aware of it; and
 - d. Any violation of any provision of this Policy immediately upon becoming aware of such violation.
2. Reporting and Addressing Violations.
 - a. Inform Board. If any member of the Board or its committees, or any officer of the Association has reasonable cause to believe that a member of the Board or its committees, or any officer of the Association has failed to make any disclosure required above, or has otherwise violated any provision of this Policy (a "**Violation**"), they shall inform the Board of the basis for such belief in an open, public meeting. The Board shall then inform the person with the alleged Violation of the basis for such alleged Violation during an open, public meeting. Additionally, any member of the Board or its committees may request a legal opinion from the Association's counsel regarding interpretation of the provisions of this Policy and its application.

If any member of the Board or its committees, or any officer of the Association has reasonable cause to believe that the Board Chair has failed to make any disclosure required above or has otherwise violated any provision of this Policy, they shall inform the Village Manager of the basis for such belief. The Village Manager shall then contact the Association's legal counsel, who will inform the Board Chair of the basis for such alleged Violation

- b. **Presentation.** The individual allegedly committing a Violation shall be given the opportunity to make a presentation describing all material facts and circumstances of the alleged Violation at an open, public meeting of the Board. After the presentation and answering any questions from the Board, the individual may not further participate in the discussion or vote on the alleged Violation, except to respond to inquiries of the Board.
- c. **Determination by Board; Action.** If, after hearing such person's response to the alleged Violation and after investigating, as it deems reasonably necessary (including consulting counsel), the Board determines by majority vote that such person has committed a Violation, the Board shall take appropriate action and may impose, to the extent permitted by law, such Sanctions as described herein, as permitted under the Association's Articles of Incorporation and Bylaws, or as otherwise permitted by law.

The person with the alleged Violation may not participate in discussions or vote establishing a Violation or any Sanction(s) to be imposed in connection therewith, except as described in Paragraph 2 (b) of Section F above.

- d. **Sanctions.** Following any vote by the Board that there is a Violation, the Board may impose Sanctions it deems reasonably advisable. Such Sanctions shall be determined and announced during an open, public meeting.
- e. **Minutes of Proceedings.** The minutes of the Board shall contain:
 - i. The name of person who committed the Violation, the nature of the Violation, any Board action taken as a result of the Violation, including imposition of Sanctions, if any; and
 - ii. The names of the members of the Board and its committees, officer, and Association staff present for discussions and votes taken in connection therewith.

The minutes of such proceedings shall be available to the public and posted on the Association's website.

G. Annual Statements. Each member of the Board and each member of any Board committee shall annually sign the statement attached as Appendix A which affirms that such person:

- a. Has received, read and understands this Conflict of Interest Policy,
- b. Has agreed to comply with this Conflict of Interest Policy, and
- c. Understands that the Association is a social welfare organization and that, in order to maintain its federal taxexemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

H. Periodic Reviews. To ensure the Association operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, the Board shall conduct periodic reviews of transactions, compensation arrangements, and policies to ensure the foregoing are all properly recorded, are in furtherance of charitable purposes, and do not result in the inurement, impermissible private benefit, or in an excess benefit transaction.

This Conflict-of-Interest Policy was adopted by the Board of Directors of the Hickory Ridge Community Association, Inc., a Maryland non-stock corporation exempt from Federal income taxation under Section 501(c)(4) of the Internal Revenue Code, at a duly called meeting held on February 7, 2022.

EACH MEMBER OF THE BOARD, OFFICER, MEMBER OF EACH COMMITTEE OF THE BOARD AND ASSOCIATION STAFF SHALL SIGN BELOW:

By signing below, I hereby certify and affirm that:

1. I have received and read a copy of the Conflict of Interests Policy.
2. I agree to comply with the Policy.
3. I have no Violations or actual or potential conflicts as described by this Policy or if I do, I have previously disclosed them as required by this Policy or am disclosing them below.
4. I understand the Association is charitable and in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Disclose on a separate sheet, to the best of your knowledge:

1. Any entity in which you have a Financial Interest or in which you participate (as a director, officer, employee, owner, or member) with which the Association (or if Columbia Association Representative, the Association and the Columbia Association) has a relationship;
2. Any transaction in which the Association (or if Columbia Association Representative, the Association and the Columbia Association) is a participant as to which you might have a conflicting interest, and
3. Any other situation which may pose an actual or perceived conflict of interest.

I, _____, hereby affirm, understand, and agree to comply with the above statement of policy.

Name: _____

Position: _____
(Board Member, Committee Member, Officer, Association Staff)

Signature: _____ Date _____

HICKORY RIDGE COMMUNITY ASSOCIATION, INC.
CONFLICT OF INTEREST PLEDGE

I, (Print Name)

(Address)

(Neighborhood)

(Email)

(Telephone)

- (1) I DO NOT have any relationships, Conflicts of Interest, or potential Conflicts of Interest to disclose.

- (2) I HAVE a Financial Interest as defined in the Hickory Ridge Community Association, Inc.'s Conflict of Interests Policy which I signed and is filed in the Village Office. My conflict could represent or be perceived to represent a conflict or duality of interest and is disclosed on the attached page.

It is my understanding that this information will be retained in the files of the Association, will be posted on the Association's public website, and will be available for review by the public. I further understand that this information may be shared with the Association's legal counsel.

I acknowledge that it is my responsibility to ensure that my disclosure information is current and complete. I agree to update my disclosure records throughout the year if there are any changes.

Date _____

Signature _____

Title _____

HICKORY RIDGE COMMUNITY ASSOCIATION, INC.

Contribution and Expense Report Instructions

To be completed *only by winning candidates* and submitted *after election votes are tallied*.

Completed Report submission is a prerequisite to certification of a candidate's election.

1. **Purpose:**

To promote campaign transparency and provide Association members information about who contributes to Association elections and what expenses are made in connection with a candidate's campaign. Your report will be available for public inspection on the Association website.

2. **Who is required to submit Report, When, and Where**

Each *winning Candidate* for Director or CA Representative who has been notified by Election Committee Chair or Association staff that they received sufficient votes to win must submit this Report **within 48 hours** of notification sent by email. Timely submission of this Report is a prerequisite to certification of your election. This Report shall be submitted to the Hickory Ridge Community Association, Inc.'s via email to manager@hickoryridgevillage.org.

3. **What must be reported**

Winning Candidates must report the amount of each Contribution and Expense, regardless of the amount, and regardless of whether the Expense has yet been paid in full. Describe each Contribution and Expense, who made the Contribution or paid/incurred the Expense, and provide the name and address of each Contributor or Person who paid/incurred the Expense.

4. **Definitions.**

Association means the Hickory Ridge Community Association, Inc.

Campaign Material means any material that: contains text, graphics, or other images; relates to a Candidate; and is published or distributed. Campaign Material includes, but is not limited to: material transmitted by or appearing on the internet or other electronic medium; and an oral commercial campaign advertisement.

Candidate means any Association member running for Director or Columbia Association Representative.

Contribution means anything of value given, loaned, utilized, advanced, or expended to influence a Candidate's election or defeat of a Candidate's opponent. A Contribution includes, but is not limited to, any:

- ***Monetary Contribution***, defined as a Contribution of money in the form of cash, check, credit card, loan, forgiveness of debt, or other transfer (for example, PayPal or cryptocurrency).
- ***In-kind Contribution***, defined as:
 - Any Contribution of goods, services, or real or personal property, including a discount on any of the foregoing that is not offered to the general public.
 - Any payment by a Person other than the Candidate for goods, services, or real or personal property (including loan or use of any of the foregoing) made (a) for the purpose of influencing the Candidate's election and (b) with the Candidate's knowledge and with the Candidate's consent, cooperation, consultation, coordination, request or suggestion. (Examples: A Person, other than the Candidate, supplies and installs billboard signs to influence the Candidate's election. The Candidate does not pay for the signs, the signs are

not given directly to the Candidate, but the Candidate has knowledge of and consulted with the Person. The fair market value of the signs and their installation is a reportable In-Kind Contribution.)

- Candidate's out-of-pocket Expenses
- Contribution of any Campaign Material

Contribution of a volunteer's time consisting solely of canvassing on behalf of a candidate shall not be considered an in-kind Contribution and is not reportable.

Contributor means a Person making a contribution. (A Contributor may or may not be the Person ultimately providing the goods or services. For example, a business owner contributing employee services to assist a campaign is a Contributor; the employees are not Contributors.)

Expense means any money or thing of value paid or owed for the purposes of influencing a Candidate's election, including promoting a Candidate's election and advocating for the defeat of Candidate's opponents. Expenses include:

- Expenses *directly* paid, owed, or incurred by a Candidate; and
- Expenses that are paid, incurred, or owed by any Person other than the Candidate in order to influence the Candidate's election, provided the expense is incurred or made with the Candidate's knowledge and with the Candidate's consent, cooperation, consultation, coordination, request or suggestion. (Example: The cost of services and supplies that a Person, other than a Candidate, pays for printing postcards to influence the Candidate's election is reportable, provided the Candidate has knowledge of and consents to, such payment).

Fair Market Value means the value of an In-Kind contribution and is determined as follows:

- Goods (such as equipment, supplies, and use of facilities) are valued at their normal purchase or rental price.
- Services (such as advertising, printing or consulting) are valued at the prevailing commercial rate at the time the services are rendered (*i.e.*, the amount that was paid or would have been paid for the services).
- Discounts are valued at the amount discounted (*i.e.*, the difference between the usual and normal charge and the amount paid).

Independent Expenditure means an expenditure for any good, service, or item of real or personal property, including but not limited to Campaign Materials, that expressly advocates for my election, and is not made in consultation or cooperation with me, or at my request or suggestion.

Person means any individual or a corporation, partnership, company, club, organization, entity, or other combination of individuals having collective capacity, including agents and representatives of the foregoing.

(Continue to next page to complete Report)

Contributions and Expenses Report

To be completed *only by winning candidates* and submitted *after election votes are tallied*.

Submission of completed Contributions and Expenses Report **is prerequisite to certification of a candidate's election.**

CONTRIBUTIONS: Complete the box below for each Contribution by every Contributor, including Contributions made by you. Attach additional sheets if reporting more than one Contributor.

| | |
|--|------------------------------|
| Contributor Number 1 | |
| Contributor's Name: | |
| Contributor's mailing address: | |
| Date of contribution: | |
| Check type of contribution: Monetary _____ In-kind _____ | Description of contribution: |
| Amount of fair market value of contribution: | \$ |

I solemnly swear and affirm that I have received no Contributions in connection with the 2022 Association elections, other than the Contributions reported above, and that the information contained in this Report is true, accurate and complete, to the best of my knowledge, information and belief.

Signature of Candidate: _____

Date: _____

Continue to next page to report Expenses

EXPENSES: Complete a box below for each Expense, whether paid, owed, or incurred directly by Candidate or another Person. Attach additional sheets if reporting more than one Expense.

| Campaign Expense 1 | |
|--|---|
| Description of Expense (include discounts): | |
| Purchased from, paid to, or owed to: | Name: _____ Address: _____ |
| Date purchased: | |
| Amount paid, owed or incurred: | \$ |
| This Expense paid, owed or incurred by: Candidate _____ Other Person _____ | If Other Person, provide name and address of Person: Name: _____ Address: _____ |

INDEPENDENT EXPENDITURES: Check one:

_____ I am NOT aware of any Independent Expenditure related to my campaign or candidacy.

_____ I AM aware of an Independent Expenditure(s) related to my campaign.
[Attach a separate page (i) describing each Independent Expenditure you are aware of, (ii) the identity of the source who made the Independent Expenditure (or if unable to identify the source, a description of your good faith efforts to identify the source), and (iii) the Fair Market Value (as defined in Paragraph 4 of Report Instructions) of the Independent Expenditure, as determined by you in your exercise of good faith and reasonable due diligence.]

I solemnly swear and affirm that I reported all Expenses, whether paid, incurred, or owed by me or another Person in connection with the 2022 Association elections; and that the information contained in this Report is true, accurate and complete, to the best of my knowledge, information and belief.

Signature of Candidate: _____

Date: _____

HICKORY RIDGE COMMUNITY ASSOCIATION

Candidate Disclosure Statement

This Disclosure is part of the Candidate's Statement and is to be completed by each applicant for candidacy. Completed Disclosure is required to be submitted at the time of Candidate's Statement submission.

Purpose: The purpose of this Disclosure Statement is to promote campaign transparency by providing voters with information, prior to election day, regarding a candidate's financial interests in any Prohibited Entities which may give rise to a conflict under the Association's Conflicts of Interest Policy, if that candidate is elected.

Who is required to submit Disclosure When and Where: This Disclosure is a part of the Candidate Statement and must be completed by each applicant for candidacy and must be submitted at the time you submit the rest of your Candidate's Statement to the Village Manager via email at manager@hickoryridgevillage.org.

Definitions:

- a. **Association:** The Hickory Ridge Community Association, Inc.
- b. **Family:** An individual's spouse, brothers and sisters (whether by the whole or half-blood), parents and their spouses, children, and spouses of children. **Financial Interest:** An interest held by a person who, directly or indirectly, through business, investment, Family relationship, personal relationship, or otherwise has (i) an ownership, investment, or personal interest in a Prohibited Entity, (excluding ownership interests in publicly-available mutual funds), or a (ii) compensation arrangement with a Prohibited Entity.
- c. **Prohibited Entity:** Any person or entity including, but not limited to any corporation, partnership, limited liability company, club, organization, governmental entity/body/instrumentality, or other combination of individuals having collective capacity to act, whether legally formed or not, and agents or representatives of the foregoing) with which the Association has had a transaction, contract, or arrangement within the Reporting Period, or any of the foregoing that has been involved in a matter (except for Exterior Alteration Applications) before the Association's Board of Directors, or to my knowledge, the Columbia Association's Board of Directors within the Reporting Period.

In furtherance of this provision, the Association will maintain on its website a publicly-available list of any individual or entity that (a) is engaged in any business activity that involves, directly or indirectly, the Association, or (b) is engaged in any matter with the Association.

- d. **Reporting Period:** The 52-week period prior to the filing of this Conflicts Disclosure Statement.
- e. **Report of Changes:** Any significant or material changes or additions happening from the date of filing through and including election day (and if a candidate is elected, through and including the date that candidate is officially seated as a member of the Board of Directors or CA Representative) must be reported to the Village Manager as they occur

Disclosure: Check A or B below:

- A. ___ To the best of my information and belief, neither I nor any member of my Family currently has, nor during the Reporting Period has had, a Financial Interest in any Prohibited Entity.

- B. ___ I wish to report that I or a member of my Family currently has, or during the Reporting Period had, the following Financial Interests in a Prohibited Entity (describe any such relationships, investments, transactions, or positions held during the Reporting Period:

I hereby certify that the information set forth in this Disclosure Statement is true and complete to the best of my information, knowledge, and belief.

Signature: _____

Date: _____

FOR USE BY VILLAGE OFFICE ONLY Received _____ (Date)

By Village Manager: _____