

**ACT 44 DISCLOSURE FORM FOR ENTITIES PROVIDING
PROFESSIONAL SERVICES TO THE
MUNICIPALITY OF KINGSTON FIREMEN, NON UNIFORM, POLICE PENSION &
KINGSTON 457 PLANS
2024**

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 or more of the pension funds of the above municipality (hereinafter the “Requesting Municipality”). Act 44 disclosure requirements apply to Contactors who provide professional pension services and receive payment of any kind from the Requesting Municipality’s pension fund. **iCM/ Integrated Capital Management** believes it falls under the requirements of Act 44 and therefore is submitting the attached disclosure form.

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.
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.

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 plan(s) for which you are providing information:

Municipality of Kingston Firemen, Non Uniform, Police Pension & Kingston 457 Plans

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.

Investment Advisors

Joseph C. Perfilio, President
Michael A. Paciotti, CFA, Chief Investment Officer
Ryan J. Lehman, CFA, CAIA, Director of Investments
Brian A. Tugend, Relationship Manager
Peter M. Seyler, Investment Specialist

The above named individuals are members of the iCM investment committee and are responsible for the investment management decisions over iCM clients.

Subcontractors

Defined Benefit Plans

TD Ameritrade Institutional – Provides custodial, reporting and trade execution services.

Black Diamond Performance – Provides independent performance reporting services to ICM and its clients.

Investment Vehicles – iCM uses only publicly traded registered mutual funds, many of the institutional share class, Exchange Traded Funds and Closed-End Funds in its client portfolios to which iCM maintains discretion. These investment vehicles can change at any time. All investment vehicles implemented are registered with the SEC via the Investment Advisors Act of 1940. iCM does not participate in any revenue sharing arrangements with mutual fund providers.

Defined Contribution Plans

TD Trust Company - Provides custodial, reporting and trade execution services.

Aspire Financial Services – Participant recordkeeping and reporting.

Note: All fees and expenses have been fully disclosed and include the services by subcontractors listed above.

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)

N/A - We have no relationships with Affiliated Entities as defined above.

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?

None of the individuals named above are current or former officials or employees of the Requesting Municipality.

4. Are any of the individuals named in Item 1 or Item 2 above a current or former registered Federal or State lobbyist?

None of the individuals named above are either current or former registered Federal or State lobbyists.

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.

We have not paid compensation to or employed any third part intermediary, agent, or lobbyist to directly or indirectly communicate with an official or employee of the *Municipal Pension System* of the Requesting Municipality (or) with any municipal official or employee of the Requesting Municipality with any transaction or investment involving our firm.

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?

None of the above listed individuals have solicited a contribution to any municipal officer or candidate for municipal office within the Requesting Municipality or to the political party or political action committee of that official or candidate.

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?

None of the above listed individuals have made contributions to a municipal officer or candidate for municipal office in the Requesting Municipality.

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?

None of the above listed individuals have any direct financial, commercial or business relationships with any employee or municipal official of the Requesting Municipality.

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?

None of the above listed individuals have given any gifts having more than a nominal value to any official, employee or fiduciary of the Requesting Municipality.

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 2004)
- 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.

None of the individuals listed has any contribution activity to report during the last five years.

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.

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.

None of the individuals listed above have any potential or actual conflict of interest with respect to any official or employee of the Requesting Municipality.

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.

We have nothing further to disclose based on our understanding of Chapter 7-A of Act 44 of 2009.

VERIFICATION

I, Rorry C. Altmann, hereby state that I am the Chief Operating Officer for Integrated Capital Management 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 the Municipality of Kingston 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.

Rorry C. Altmann
Signature

11/12/24
Date