

NEW YORK STATE JOINT COMMISSION ON PUBLIC ETHICS

2018

Annual Statement of Financial Disclosure ("FDS") Supplemental Form for New York City Conflicts of Interest Board ("COIB") Filers

INTRODUCTION

Pursuant to Resolution 16-01 of the New York State Joint Commission on Public Ethics ("JCOPE"), any individual who is required to file both an FDS with JCOPE pursuant to Public Officers Law Section 73-a and an Annual Disclosure Report with the New York City Conflicts of Interest Board ("COIB") pursuant to New York City Administrative Code Section 12-110 may submit this FDS Supplemental Form, along with a current copy of his or her COIB Annual Disclosure Report, in lieu of a complete FDS.

The submission of this Supplemental Form and the COIB Annual Disclosure Report in lieu of a complete FDS is **optional**. JCOPE regulations regarding public records inspections and requests for deletions, not COIB rules, govern such submissions. Filers who opt not to submit this Supplemental Form with the COIB Annual Disclosure Report may complete an FDS through JCOPE's online filing system or by submitting a paper form.

PROCEDURE

To use this Supplemental Form, the filer must:

1. Complete all questions in the COIB Annual Disclosure Report;
2. Complete all questions in this Supplemental Form; and
3. Submit to JCOPE this Supplemental Form and an *un-redacted* copy of the filer's Annual Disclosure Report (and any amendments) as filed with COIB. The submission should be mailed to: FDS Unit, NYS Joint Commission on Public Ethics, 540 Broadway, Albany, NY 12207.

INSTRUCTIONS

Answer each question with respect to calendar year 2018, unless another period or date is specified.

Answer each question completely. Do not leave any response blank. For those questions that do not apply to you or for which you have no information to report, please indicate "N/A" or "none."

If two or more questions require the same response or information, you may reference one response in the other question, so long as the response provides all information that is required by both questions.

When reporting "income" in response to a question, the term "income" means aggregate net income before taxes.

When reporting a value or amount in response to a question, use the categories from either Table I or Table II (see Appendix B), as specified in the question. Indicate the category by letter only. You do not need to report the actual dollar amount.

You may attach additional pages to this Supplemental Form if you need more space. Each additional page should include: (1) your name; (2) the question number; and (3) the remainder of your answer.

Employee Details	
Name	
State Agency	
Title of Position	
Filing Year	

**Licensed Professions and Business Relationships
FDS Questions 8(a), (b-1), (b-2), (c), and (d)**

For guidance on completing these questions, please refer to Appendix A.

8. (a) If the reporting individual practices law, is licensed by the department of state as a real estate broker or agent or practices a profession licensed by the department of education, or works as a member or employee of a firm required to register pursuant to section one-e of the legislative law as a lobbyist, describe the services rendered for which compensation was paid including a general description of the principal subject areas of matters undertaken by such individual and principal duties performed. Specifically state whether the reporting individual provides services directly to clients. Additionally, if such an individual practices with a firm or corporation and is a partner or shareholder of the firm or corporation, give a general description of principal subject areas of matters undertaken by such firm or corporation.

NONE

(b-1) APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN (FOR PURPOSES OF THIS QUESTION, "SERVICES" SHALL MEAN CONSULTATION, REPRESENTATION, ADVICE OR OTHER SERVICES):

If the reporting individual receives income from employment reportable in question 8(a) and personally provides services to any person or entity, or works as a member or employee of a partnership or corporation that provides such services (referred to hereinafter as a "firm"), the reporting individual shall identify each client or customer to whom the reporting individual personally provided services, or who was referred to the firm by the reporting individual, and from whom the reporting individual or his or her firm earned fees in excess of \$10,000 during the reporting period in direct connection with:

- (i) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;
- (ii) A grant of \$10,000 or more from the state or any state agency during the reporting period;
- (iii) A grant obtained through a legislative initiative during the reporting period; or
- (iv) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period.

For such services rendered by the reporting individual directly to each such client, describe each matter that was the subject of such representation, the services actually provided and the payment received. For payments received from clients referred to the firm by the reporting individual, if the reporting individual directly received a referral fee or fees for such referral, identify the client and the payment so received.

For purposes of this question, "referred to the firm" shall mean: having intentionally and knowingly taken a specific act or series of acts to intentionally procure for the reporting individual's firm or having knowingly solicited or directed to the reporting individual's firm in whole or substantial part, a person or entity that becomes a client of that firm for the purposes of representation for a matter as defined in clauses (i) through (iv) of this subparagraph, as the result of such procurement, solicitation or direction of the reporting individual. A reporting individual need not disclose activities performed while lawfully acting in his or her capacity as provided in paragraphs (c), (d), (e) and (f) of subdivision seven of section seventy-three of this article.

NONE

Client	Matter	Nature of Services Provided	Category of Amount (in Table I)

(b-2) APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN (FOR PURPOSES OF THIS QUESTION, "SERVICES" SHALL MEAN CONSULTATION, REPRESENTATION, ADVICE OR OTHER SERVICES):

(i) With respect to reporting individuals who receive ten thousand dollars or more from employment or activity reportable under question 8(a), for each client or customer NOT otherwise disclosed or exempted in question 8 or 13, disclose the name of each client or customer known to the reporting individual to whom the reporting individual provided services: (A) who paid the reporting individual in excess of five thousand dollars for such services; or (B) who had been billed with the knowledge of the reporting individual in excess of five thousand dollars by the firm or other entity named in question 8(a) for the reporting individual's services.

NONE

Client	Services Actually Provided	Category of Amount (in Table I)

FOLLOWING IS AN ILLUSTRATIVE, NON-EXCLUSIVE LIST OF EXAMPLES OF DESCRIPTIONS OF "SERVICES ACTUALLY PROVIDED":

- REVIEWED DOCUMENTS AND CORRESPONDENCE;
- REPRESENTED CLIENT (IDENTIFY CLIENT BY NAME) IN LEGAL PROCEEDING;
- PROVIDED LEGAL ADVICE ON CLIENT MATTER (IDENTIFY CLIENT BY NAME);
- CONSULTED WITH CLIENT OR CONSULTED WITH LAW PARTNERS/ASSOCIATES/MEMBERS OF FIRM ON CLIENT MATTER (IDENTIFY CLIENT BY NAME);
- PREPARED CERTIFIED FINANCIAL STATEMENT FOR CLIENT (IDENTIFY CLIENT BY NAME);
- REFERRED INDIVIDUAL OR ENTITY (IDENTIFY CLIENT BY NAME) FOR REPRESENTATION OR CONSULTATION;
- COMMERCIAL BROKERING SERVICES (IDENTIFY CUSTOMER BY NAME);
- PREPARED CERTIFIED ARCHITECTURAL OR ENGINEERING RENDERINGS FOR CLIENT (IDENTIFY CUSTOMER BY NAME);
- COURT APPOINTED GUARDIAN OR EVALUATOR (IDENTIFY COURT NOT CLIENT).

(ii) With respect to reporting individuals who disclosed in question 8(a) that the reporting individual did not provide services to a client but provided services to a firm or business, identify the category of amount received for providing such services and describe the services rendered.

NONE

Services Actually Provided	Category of Amount in Table I

A reporting individual need not disclose activities performed while lawfully acting in his or her capacity as provided in paragraphs (c), (d), (e) and (f) of subdivision seven of section seventy-three of this article.

The disclosure requirement in questions (b-1) and (b-2) shall not require disclosing clients or customers receiving medical, pharmaceutical or dental services, mental health services, or residential real estate brokering services from the reporting individual or his or her firm or if federal law prohibits or limits disclosure. The reporting individual need not identify any client to whom he or she or his or her firm provided legal representation with respect to investigation or prosecution by law enforcement authorities, bankruptcy, family court, estate planning, or domestic relations matters, nor shall the reporting individual identify individuals represented pursuant to an insurance policy but the reporting individual shall in such circumstances only report the entity that provides compensation to the reporting individual; with respect to matters in which the client's name is required by law to be kept confidential (such as matters governed by the family court act) or in matters in which the reporting individual represents or provides services to minors, the client's name may be replaced with initials. To the extent that the reporting individual, or his or her firm, provided legal representation with respect to an initial public offering, and professional disciplinary rules, federal law or regulations restrict the disclosure of information relating to such work, the reporting individual shall (i) disclose the identity of the client and the services provided relating to the initial public offering to the office of court administration, who will maintain such information confidentially in a locked box; and (ii) include in his or her response to questions (b-1) and (b-2) that pursuant to this paragraph, a disclosure to the office of court administration has been made. Upon such time that the disclosure of information maintained in the locked box is no longer restricted by professional disciplinary rules, federal law or regulation, the reporting individual shall disclose such information in an amended disclosure statement in response to the disclosure requirements in questions (b-1) and (b-2). The office of court administration shall develop and maintain a secure portal through which information submitted to it pursuant to this paragraph can be safely and confidentially stored. With respect to clients represented in other matters not otherwise exempt, the reporting individual may request an exemption to publicly disclosing the name of that client from the joint commission pursuant to paragraph (i-1) of subdivision nine of section ninety-four of the executive law, or from the office of court administration. In such application, the reporting individual shall state the following: "My client is not currently receiving my services or seeking my services in connection with:

- (i) A proposed bill or resolution in the senate or assembly during the reporting period;
- (ii) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;

- (iii) A grant of \$10,000 or more from the state or any state agency during the reporting period;
- (iv) A grant obtained through a legislative initiative during the reporting period; or
- (v) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period."

In reviewing the request for an exemption, the joint commission or the office of court administration may consult with bar or other professional associations and the legislative ethics commission for individuals subject to its jurisdiction and may consider the rules of professional conduct. In making its determination, the joint commission or the office of court administration shall conduct its own inquiry and shall consider factors including, but not limited to: (i) the nature and the size of the client; (ii) whether the client has any business before the state; and if so, how significant the business is; and whether the client has any particularized interest in pending legislation and if so how significant the interest is; (iii) whether disclosure may reveal trade secrets; (iv) whether disclosure could reasonably result in retaliation against the client; (v) whether disclosure may cause undue harm to the client; (vi) whether disclosure may result in undue harm to the attorney-client relationship; and (vii) whether disclosure may result in an unnecessary invasion of privacy to the client.

The joint commission or, as the case may be, the office of court administration shall promptly make a final determination in response to such request, which shall include an explanation for its determination. The office of court administration shall issue its final determination within three days of receiving the request. Notwithstanding any other provision of law or any professional disciplinary rule to the contrary, the disclosure of the identity of any client or customer in response to this question shall not constitute professional misconduct or a ground for disciplinary action of any kind, or form the basis for any civil or criminal cause of action or proceeding. A reporting individual who first enters public office after January first, two thousand sixteen, need not report clients or customers with respect to matters for which the reporting individual or his or her firm was retained prior to entering public office.

- (c) APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN:**

If the reporting individual receives income of ten thousand dollars or greater from any employment or activity reportable under question 8(a), identify each registered lobbyist who has directly referred to such individual a client who was successfully referred to the reporting individual's business and from whom the reporting individual or firm received a fee for services in excess of five thousand dollars. Report only those referrals that were made to a reporting individual by direct communication from a person known to such reporting individual to be a registered lobbyist at the time the referral is made. With respect to each such referral, the reporting individual shall identify the client, the registered lobbyist who has made the referral, the category of value of the compensation received and a general description of the type of matter so referred. A reporting individual need not disclose activities performed while lawfully acting pursuant to paragraphs (c), (d), (e) and (f) of subdivision seven of section seventy-three of this article. The disclosure requirements in this question shall not require disclosing clients or customers receiving medical, pharmaceutical or dental services, mental health services, or residential real estate brokering services from

the reporting individual or his or her firm or if federal law prohibits or limits disclosure. The reporting individual need not identify any client to whom he or she or his or her firm provided legal representation with respect to investigation or prosecution by law enforcement authorities, bankruptcy, family court, estate planning, or domestic relations matters, nor shall the reporting individual identify individuals represented pursuant to an insurance policy but the reporting individual shall in such circumstances only report the entity that provides compensation to the reporting individual; with respect to matters in which the client's name is required by law to be kept confidential (such as matters governed by the family court act) or in matters in which the reporting individual represents or provides services to minors, the client's name may be replaced with initials. To the extent that the reporting individual, or his or her firm, provided legal representation with respect to an initial public offering, and federal law or regulations restricts the disclosure of information relating to such work, the reporting individual shall (i) disclose the identity of the client and the services provided relating to the initial public offering to the office of court administration, who will maintain such information confidentially in a locked box; and (ii) include in his or her response a statement that pursuant to this paragraph, a disclosure to the office of court administration has been made. Upon such time that the disclosure of information maintained in the locked box is no longer restricted by federal law or regulation, the reporting individual shall disclose such information in an amended disclosure statement in response to the disclosure requirements of this paragraph. The office of court administration shall develop and maintain a secure portal through which information submitted to it pursuant to this paragraph can be safely and confidentially stored. With respect to clients represented in other matters not otherwise exempt, the reporting individual may request an exemption to publicly disclosing the name of that client from the joint commission pursuant to paragraph (i-1) of subdivision nine of section ninety-four of the executive law, or from the office of court administration. In such application, the reporting individual shall state the following: "My client is not currently receiving my services or seeking my services in connection with:

- (i) A proposed bill or resolution in the senate or assembly during the reporting period;
- (ii) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;
- (iii) A grant of \$10,000 or more from the state or any state agency during the reporting period;
- (iv) A grant obtained through a legislative initiative during the reporting period; or
- (v) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period."

In reviewing the request for an exemption, the joint commission or the office of court administration may consult with bar or other professional associations and the legislative ethics commission for individuals subject to its jurisdiction and may consider the rules of professional conduct. In making its determination, the joint commission or the office of court administration shall conduct its own inquiry and shall consider factors including, but not limited to: (i) the nature and the size of the client; (ii) whether the client has any business before the state; and if so, how significant the business is; and whether the client has any particularized interest in pending legislation and if so how significant the interest is; (iii) whether disclosure may reveal trade secrets; (iv) whether disclosure could reasonably result in retaliation against the client; (v) whether disclosure may cause undue harm to the client; (vi) whether disclosure may result in undue harm to the attorney-client relationship; and (vii) whether disclosure may result in an unnecessary invasion of privacy to the client.

The joint commission or, as the case may be, the office of court administration shall promptly make a final determination in response to such request, which shall include an explanation for its determination. The office of court administration shall issue its final determination within three days of receiving the request. Notwithstanding any other provision of law or any professional disciplinary rule to the contrary, the disclosure of the identity of any client or customer in response to this question shall not constitute professional misconduct or a ground for disciplinary action of any kind, or form the basis for any civil or criminal cause of action or proceeding. A reporting individual who first enters public office after December thirty-first, two thousand fifteen, need not report clients or customers with respect to matters for which the reporting individual or his or her firm was retained prior to entering public office.

NONE

Client	Name of Lobbyist	Description of Matter	Category of Amount (in Table I)

(d) List the name, principal address and general description or the nature of the business activity of any entity in which the reporting individual or such individual's spouse had an investment in excess of \$1,000 excluding investments in securities and interests in real property.

NONE

APPENDIX A

The following information addresses each question on the Supplemental Form. The question appears in italics, followed by explanatory text summarizing JCOPE's interpretation of the question, what to report, and things you should note when responding to the question.

Question 8(a)

If the reporting individual practices law, is licensed by the department of state as a real estate broker or agent or practices a profession licensed by the department of education, or works as a member or employee of a firm required to register pursuant to section one-e of the legislative law as a lobbyist, describe the services rendered for which compensation was paid including a general description of the principal subject areas of matters undertaken by such individual and principal duties performed. Specifically state whether the reporting individual provides services directly to clients. Additionally, if such an individual practices with a firm or corporation and is a partner or shareholder of the firm or corporation, give a general description of principal subject areas of matters undertaken by such firm or corporation.

This question applies if you work as a member or employee of a firm registered as a lobbyist, or are licensed to practice any of the following professions:

- law;
- real estate (as a broker or agent);
- one of the professions licensed by the Department of Education:
 - Acupuncture
 - Applied Behavior Analysis
 - Licensed Behavior Analyst
 - Certified Behavior Analyst Assistant
 - Architecture
 - Athletic Training
 - Audiology
 - Chiropractic
 - Clinical Laboratory Technology
 - Clinical Laboratory Technologist
 - Cytotechnologist
 - Clinical Laboratory Technician
 - Histological Technician
 - Dentistry
 - Dentists
 - Dental Anesthesia
 - Dental Hygienist
 - Certified Dental Assistant
 - Dietetics and Nutrition
 - Engineering
 - Geology
 - Interior Design
 - Land Surveying
 - Landscape Architecture
 - Massage Therapy
 - Midwifery
 - Nursing
 - Registered Professional Nurse
 - Licensed Practical Nurse
 - Nurse Practitioner
 - Clinical Nurse Specialist
 - Occupational Therapy
 - Occupational Therapist
 - Occupational Therapy Assistant
 - Ophthalmic Dispensing
 - Optometry
 - Perfusion
 - Pharmacy
 - Pharmacist
 - Pharmacy Establishment
 - Physical Therapy
 - Physical Therapist
 - Physical Therapist Assistant
 - Podiatry
 - Polysomnographic Technology
 - Psychology
 - Public Accountancy
 - Certified Public Accountant
 - Public Accountant
 - Respiratory Therapy

- Medical Physics
- Medicine
 - Physician
 - Physician Assistant
 - Specialist Assistant
- Mental Health Practitioners
 - Mental Health Counselor
 - Marriage and Family Therapist
 - Creative Arts Therapist
 - Psychoanalyst
- Respiratory Therapist
- Respiratory Therapy Technician
- Shorthand Reporting
- Social Work
 - Licensed Master Social Worker
 - Licensed Clinical Social Worker
- Speech-Language Pathology
- Veterinary Medicine and Animal Health Technology
 - Veterinarian
 - Veterinary Technician

WHAT TO REPORT:

- If you engaged in the practice of a licensed profession in 2018, report:
 - the license;
 - a description of the services rendered for compensation (including subject areas);
 - **whether you provided services directly to clients;** and
 - if you practice with a firm and are a partner or shareholder of the firm, the firm's practice areas.
- If you are licensed to practice a licensed profession but did not engage in the practice of such profession in 2018, report the license and state that you did not engage in such practice.

Questions 8(b-1), 8(b-2)(i), 8(b-2)(ii), and 8(c)

These questions require disclosure of certain client- and customer-related information if you or your firm were retained by a client or customer for a matter on or after December 31, 2015. However, you **do not** need to report clients or customers with respect to matters for which you or your firm were retained before you entered state service.

Furthermore, you **do not** need to report activities performed while you were lawfully acting in your capacity as:

- A Statewide elected official, State officer or employee (unless otherwise prohibited), a member of the Legislature or legislative employee, or a political party chairman, and appear before a State agency in a representative capacity in connection with a ministerial matter;
- A member of the Legislature, or a legislative employee on behalf of such member, who participates in or advocates any position in any matter in an official or legislative capacity, including, but not limited to, acting as a public advocate whether or not on behalf of a constituent;
- A State officer or employee who appears before a State agency in a representative capacity on behalf of an employee organization in any matter where the appearance is authorized by the organization; or
- A political party chairman who participates in or advocates any matter in an official capacity.

Additionally, you do not have to disclose:

- Information prohibited from disclosure under federal law.
- Clients or customers who received any of the following services:
 - Medical, pharmaceutical, or dental;
 - Mental health;
 - Residential real estate brokering;
 - Insurance brokering; or
 - Legal representation for:
 - investigations or prosecution by law enforcement authorities;
 - bankruptcy;
 - family court;
 - estate planning; or
 - domestic relations matters.

Special reporting requirements:

- If you or your firm represented a client pursuant to an insurance policy, do not disclose the client's name. Report only the entity that provided payment to you or your firm.
- If the name of the client is required by law to be kept confidential (for example, in matters governed by the Family Court Act), or if the client is a minor, do not disclose the client's full name. Report only the client's initials.
- If you or your firm provided legal representation with respect to an initial public offering ("IPO"), and professional disciplinary rules, federal law, or regulations restrict the disclosure of information relating to that work:
 - Report the identity of the client and the services provided relating to the IPO to the Office of Court Administration (OCA), which will maintain that information confidentially; and
 - Report in your response to this Question that you have made a disclosure to OCA pursuant to Question 8(b)(ii).
 - When disclosure of the information maintained by OCA is no longer restricted by professional disciplinary rules, federal law, or regulation, you must report the information in an amended Statement. For more information, please see OCA's website at <https://www.nycourts.gov/rules/disclosure-exemption-IPO-report-POL73a/>.

Exemption from client disclosure:

Where disclosure of a client or customer's identity is likely to cause harm, you may seek an exemption from disclosure from JCOPE or from OCA. For more information, see Title 19 NYCRR Part 942 from the JCOPE website at www.jcope.ny.gov, and select "Commission Regulations" from the "Laws" drop down menu. From the OCA website, go to <https://www.nycourts.gov/rules/disclosure-exemption-IPO-report-POL73a/>.

Question 8(b-1)

APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN (FOR PURPOSES OF THIS QUESTION, "SERVICES" SHALL MEAN CONSULTATION, REPRESENTATION, ADVICE OR OTHER SERVICES):

If the reporting individual receives income from employment reportable in question 8(a) and personally provides services to any person or entity, or works as a member or employee of a partnership or corporation that provides such services (referred to hereinafter as a "firm"), the reporting individual shall identify each client or customer to whom the reporting individual personally provided services, or who was referred to the firm by the reporting individual, and from whom the reporting individual or his or her firm earned fees in excess of \$10,000 during the reporting period in direct connection with:

- (i) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;*
- (ii) A grant of \$10,000 or more from the state or any state agency during the reporting period;*
- (iii) A grant obtained through a legislative initiative during the reporting period; or*
- (iv) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period.*

For such services rendered by the reporting individual directly to each such client, describe each matter that was the subject of such representation, the services actually provided and the payment received. For payments received from clients referred to the firm by the reporting individual, if the reporting individual directly received a referral fee or fees for such referral, identify the client and the payment so received.

For purposes of this question, "referred to the firm" shall mean: having intentionally and knowingly taken a specific act or series of acts to intentionally procure for the reporting individual's firm or having knowingly solicited or directed to the reporting individual's firm in whole or substantial part, a person or entity that becomes a client of that firm for the purposes of representation for a matter as defined in clauses (i) through (iv) of this subparagraph, as the result of such procurement, solicitation or direction of the reporting individual. A reporting individual need not disclose activities performed while lawfully acting in his or her capacity as provided in paragraphs (c), (d), (e), and (f) of subdivision seven of section seventy-three of this article.

Client	Matter	Nature of Services Provided	Category of Amount (in Table I)
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This question applies if:

- You received income from a profession that you reported in response to Question 8(a);
- You personally provided services, or work for a partnership or corporation (a "Firm") that provided services, to a client or customer, or you personally referred to your Firm such client or customer; and

- You or your Firm earned fees of more than \$10,000 in 2018 from such client or customer in direct connection with any of the following activities:
 - a contract in an amount totaling \$50,000 or more from the state or any state agency for services, materials, or property;
 - a grant of \$25,000 or more from the state or any state agency during the reporting period;
 - a grant obtained through a legislative initiative during the reporting period; or
 - a case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period.

“**Services**” means consultation, representation, advice, or other services.

“**Referred to the firm**” means having intentionally and knowingly taken a specific act or series of acts to intentionally procure for your Firm or knowingly solicit or direct to your Firm in whole or substantial part, a person or entity that becomes a client of that firm for the purposes of representation in at least one of the activities listed above, as the result of such procurement, solicitation, or direction.

“**State agency**” is defined in section 73-a(1)(b) of the Public Officers Law.

WHAT TO REPORT:

- The identity of each client or customer to whom you or your Firm provided services, or who you personally referred to the Firm.
- The matter that was the subject of your or your Firm’s services.
- The nature of the services provided.
- The category of payment received by your or your Firm for the services. If you did not provide services, but referred the client or customer to the Firm and received a referral fee, report only the category of the amount of such fee.

Question 8(b-2)(i)

APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN (FOR PURPOSES OF THIS QUESTION "SERVICES" SHALL MEAN CONSULTATION, REPRESENTATION, ADVICE OR OTHER SERVICES):

- (i) *With respect to reporting individuals who receive ten thousand dollars or more from employment or activity reportable under question 8(a), for each client or customer NOT otherwise disclosed or exempted in question 8 or 13, disclose the name of each client or customer known to the reporting individual to whom the reporting individual provided services: (A) who paid the reporting individual in excess of five thousand dollars for such services; or (B) who had been billed with the knowledge of the reporting individual in excess of five thousand dollars by the firm or other entity named in question 8(a) for the reporting individual's services.*

Client	Services Actually Provided	Category of Amount (in Table I)
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FOLLOWING IS AN ILLUSTRATIVE, NON-EXCLUSIVE LIST OF EXAMPLES OF DESCRIPTIONS OF “SERVICES ACTUALLY PROVIDED”:

- * REVIEWED DOCUMENTS AND CORRESPONDENCE;
- * REPRESENTED CLIENT (IDENTIFY CLIENT BY NAME) IN LEGAL PROCEEDING;
- * PROVIDED LEGAL ADVICE ON CLIENT MATTER (IDENTIFY CLIENT BY NAME);
- * CONSULTED WITH CLIENT OR CONSULTED WITH LAW PARTNERS/ASSOCIATES/MEMBERS OF FIRM ON CLIENT MATTER (IDENTIFY CLIENT BY NAME);
- * PREPARED CERTIFIED FINANCIAL STATEMENT FOR CLIENT (IDENTIFY CLIENT BY NAME);
- * REFERRED INDIVIDUAL OR ENTITY (IDENTIFY CLIENT BY NAME) FOR REPRESENTATION OR CONSULTATION;
- * COMMERCIAL BROKERING SERVICES (IDENTIFY CUSTOMER BY NAME);
- * PREPARED CERTIFIED ARCHITECTURAL OR ENGINEERING RENDERINGS FOR CLIENT (IDENTIFY CUSTOMER BY NAME);
- * COURT APPOINTED GUARDIAN OR EVALUATOR (IDENTIFY COURT NOT CLIENT)

This question applies if:

- You received income of at least \$10,000 from a profession that you reported in response to Question 8(a); and
- You provided services to a client or customer who:
 - paid you more than \$5,000 for such services; or
 - to your knowledge, was billed by the firm or corporation you reported in response to Question 8(a) more than \$5,000 for your services.

“Services” means consultation, representation, advice, or other services.

Note: You do not need to report information that you already reported, or that is not required to be disclosed, in response to Question 8 above.

WHAT TO REPORT:

- The identity of each client or customer to whom you provided services.
- The services actually provided. Illustrative examples of “services actually provided” are included at the end of the question.
- The category of payment the client or customer paid you for the services, or the category of amount that the client or customer was billed by you Firm for the services.

Question 8(b-2)(ii)

With respect to reporting individuals who disclosed in question 8(a) that the reporting individual did not provide services to a client but provided services to a firm or business, identify the category of amount received for providing such services and describe the services rendered.

Services Actually Provided	Category of Amount (Table I)
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A reporting individual need not disclose activities performed while lawfully acting in his or her capacity as provided in paragraphs (c), (d), (e), and (f) of subdivision seven of section seventy-three of this article.

The disclosure requirement in questions (b-1) and (b-2) shall not require disclosing clients or customers receiving medical, pharmaceutical or dental services, mental health services, or residential real estate brokering services from the reporting individual or his or her firm or if federal law prohibits or limits disclosure. The reporting individual need not identify any client to whom he or she or his or her firm provided legal representation with respect to investigation or prosecution by law enforcement authorities, bankruptcy, family court, estate planning, or domestic relations matters, nor shall the reporting individual identify individuals represented pursuant to an insurance policy but the reporting individual shall in such circumstances only report the entity that provides compensation to the reporting individual; with respect to matters in which the client’s name is required by law to be kept confidential (such as matters governed by the family court act) or in matters in which the reporting individual represents or provides services to minors, the client’s name may be replaced with initials. To the extent that the reporting individual, or his or her firm, provided legal representation with respect to an initial public offering, and professional disciplinary rules, federal law or regulations restrict the disclosure of information relating to such work, the reporting individual shall (i) disclose the identity of the client and the services provided relating to the initial public offering to the office of court administration, who will maintain such information confidentially in a locked box; and (ii) include in his or her response to questions (b-1) and b-2) that pursuant to this paragraph, a disclosure to the office of court administration has been made. Upon such time that the disclosure of information maintained in the locked box is no longer restricted by professional disciplinary rules, federal law or regulation, the reporting individual shall disclose such information in an amended disclosure statement in response to the disclosure requirements in questions (b-1) and (b-2). The office of court administration shall develop and maintain a secure portal through which information submitted to it pursuant to this paragraph can be safely and confidentially stored. With respect to clients represented in other matters not otherwise exempt, the reporting individual may request an exemption to publicly disclosing the name of that client from the joint commission pursuant to paragraph (i-1) of subdivision nine of section ninety-four of the executive law, or from the office of court administration. In such application, the reporting individual shall state the following:

"My client is not currently receiving my services or seeking my services in connection with:

- (i) A proposed bill or resolution in the senate or assembly during the reporting period;*
- (ii) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;*
- (iii) A grant of \$10,000 or more from the state or any state agency during the reporting period;*
- (iv) A grant obtained through a legislative initiative during the reporting period; or*
- (v) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period."*

In reviewing the request for an exemption, the joint commission or the office of court administration may consult with bar or other professional associations and the legislative ethics commission for individuals subject to its jurisdiction and may consider the rules of professional conduct. In making its determination, the joint commission or the office of court administration shall conduct its own inquiry and shall consider factors including, but not limited to: (i) the nature and the size of the client; (ii) whether the client has any business before the state; and if so, how significant the business is; and whether the client has any particularized interest in pending legislation and if so how significant the interest is; (iii) whether disclosure may reveal trade secrets; (iv) whether disclosure could reasonably result in retaliation against the client; (v) whether disclosure may cause undue harm to the client; (vi) whether disclosure may result in undue harm to the attorney-client relationship; and (vii) whether disclosure may result in an unnecessary invasion of privacy to the client.

The joint commission or, as the case may be, the office of court administration shall promptly make a final determination in response to such request, which shall include an explanation for its determination. The office of court administration shall issue its final determination within three days of receiving the request. Notwithstanding any other provision of law or any professional disciplinary rule to the contrary, the disclosure of the identity of any client or customer in response to this question shall not constitute professional misconduct or a ground for disciplinary action of any kind, or form the basis for any civil or criminal cause of action or proceeding. A reporting individual who first enters public office after January first, two thousand sixteen, need not report clients or customers with respect to matters for which the reporting individual or his or her firm was retained prior to entering public office.

This question applies if:

You reported in response to Question 8(a) that you did not provide services directly to clients, but you provided services to a Firm. **“Services”** means consultation, representation, advice, or other services.

WHAT TO REPORT:

- The services you actually provided. Illustrative examples of “services actually provided” are included at the end of the Question 8(b-2)(i).
- The category of amount you received for providing such services.

You do not need to report the identity of the client.

Question 8(c)

APPLICABLE ONLY TO NEW CLIENTS OR CUSTOMERS FOR WHOM SERVICES ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN, OR FOR NEW MATTERS FOR EXISTING CLIENTS OR CUSTOMERS WITH RESPECT TO THOSE SERVICES THAT ARE PROVIDED ON OR AFTER DECEMBER THIRTY-FIRST, TWO THOUSAND FIFTEEN:

If the reporting individual receives income of ten thousand dollars or greater from any employment or activity reportable under question 8(a), identify each registered lobbyist who has directly referred to such individual a client who was successfully referred to the reporting individual's business and from whom the reporting individual or firm received a fee for services in excess of five thousand dollars. Report only those referrals that were made to a reporting individual by direct communication from a person known to such reporting individual to be a registered lobbyist at the time the referral is made. With respect to each such

referral, the reporting individual shall identify the client, the registered lobbyist who has made the referral, the category or value of the compensation received and a general description of the type of matter so referred. A reporting individual need not disclose activities performed while lawfully acting pursuant to paragraphs (c), (d), (e) and (f) of subdivision seven of section seventy-three of this article. The disclosure requirements in this question shall not require disclosing clients or customers receiving medical, pharmaceutical or dental services, mental health services, or residential real estate brokering services from the reporting individual or his or her firm or if federal law prohibits or limits disclosure. The reporting individual need not identify any client to whom he or she or his or her firm provided legal representation with respect to investigation or prosecution by law enforcement authorities, bankruptcy, family court, estate planning, or domestic relations matters, nor shall the reporting individual identify individuals represented pursuant to an insurance policy but the reporting individual shall in such circumstances only report the entity that provides compensation to the reporting individual; with respect to matters in which the client's name is required by law to be kept confidential (such as matters governed by the family court act) or in matters in which the reporting individual represents or provides services to minors, the client's name may be replaced with initials. To the extent that the reporting individual, or his or her firm, provided legal representation with respect to an initial public offering, and federal law or regulations restricts the disclosure of information relating to such work, the reporting individual shall (i) disclose the identity of the client and the services provided relating to the initial public offering to the office of court administration, who will maintain such information confidentially in a locked box; and (ii) include in his or her response a statement that pursuant to this paragraph, a disclosure to the office of court administration has been made. Upon such time that the disclosure of information maintained in the locked box is no longer restricted by federal law or regulation, the reporting individual shall disclose such information in an amended disclosure statement in response to the disclosure requirements of this paragraph. The office of court administration shall develop and maintain a secure portal through which information submitted to it pursuant to this paragraph can be safely and confidentially stored. With respect to clients represented in other matters not otherwise exempt, the reporting individual may request an exemption to publicly disclosing the name of that client from the joint commission pursuant to paragraph (i-1) of subdivision nine of section ninety-four of the executive law, or from the office of court administration. In such application, the reporting individual shall state the following:

"My client is not currently receiving my services or seeking my services in connection with:

- (i) A proposed bill or resolution in the senate or assembly during the reporting period;*
- (ii) A contract in an amount totaling \$10,000 or more from the state or any state agency for services, materials, or property;*
- (iii) A grant of \$10,000 or more from the state or any state agency during the reporting period;*
- (iv) A grant obtained through a legislative initiative during the reporting period; or*
- (v) A case, proceeding, application or other matter that is not a ministerial matter before a state agency during the reporting period."*

In reviewing the request for an exemption, the joint commission or the office of court administration may consult with bar or other professional associations and the legislative ethics commission for individuals subject to its jurisdiction and may consider the rules of professional conduct. In making its determination, the joint commission or the office of court administration shall conduct its own inquiry and shall consider factors including, but not limited to: (i) the nature and the size of the client; (ii) whether the client has any business before the state; and if so, how significant the business is; and whether the client has any particularized interest in pending legislation and if so how significant the interest is; (iii) whether disclosure may reveal trade secrets; (iv) whether disclosure could reasonably result in retaliation against the client; (v) whether disclosure may cause undue harm to the client; (vi) whether disclosure may result in undue

harm to the attorney-client relationship; and (vii) whether disclosure may result in an unnecessary invasion of privacy to the client.

The joint commission or, as the case may be, the office of court administration shall promptly make a final determination in response to such request, which shall include an explanation for its determination. The office of court administration shall issue its final determination within three days of receiving the request. Notwithstanding any other provision of law or any professional disciplinary rule to the contrary, the disclosure of the identity of any client or customer in response to this question shall not constitute professional misconduct or a ground for disciplinary action of any kind, or form the basis for any civil or criminal cause of action or proceeding. A reporting individual who first enters public office after December thirty-first, two thousand fifteen, need not report clients or customers with respect to matters for which the reporting individual or his or her firm was retained prior to entering public office.

Client	Name of Lobbyist	Description of Matter	Category of Amount (in Table I)
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This question applies if:

- You received income of at least \$10,000 from a profession that you reported in response to Question 8(a);
- **A registered lobbyist directly referred a client to you or your Firm;** and
- You or your Firm received a fee for services of more than \$5,000 from such client.

“**Directly referred**” means the registered lobbyist made the referral to you through direct communication.

“**Services**” means consultation, representation, advice, or other services.

WHAT TO REPORT:

- The identity of each client or customer who was referred by the registered lobbyist.
- The registered lobbyist who made the referral.
- The category of payment received by you or your Firm from the client or customer.
- The nature of the matter that was the subject of your or your Firm’s services.

Question 8(d)

List the name, principal address and general description or the nature of the business activity of any entity in which the reporting individual or such individual's spouse had an investment in excess of \$1,000 excluding investments in securities and interests in real property.

WHAT TO REPORT:

- Any business entities in which you or your spouse had an investment of more than \$1,000, other than investments in securities or real property.
- The name and address of the business.
- A description of the nature of the business.

Note: This question is not limited to investments in the licensed professions covered by Question 8(a).

DO NOT REPORT:

- Investments in stocks or other securities (reportable in response to Question 16).
- Investments in real property (reportable in response to Question 17).

APPENDIX B

TABLE I

Category A	none		
Category B	\$1	to under	\$1,000
Category C	\$1,000	to under	\$5,000
Category D	\$5,000	to under	\$20,000
Category E	\$20,000	to under	\$50,000
Category F	\$50,000	to under	\$75,000
Category G	\$75,000	to under	\$100,000
Category H	\$100,000	to under	\$150,000
Category I	\$150,000	to under	\$250,000
Category J	\$250,000	to under	\$350,000
Category K	\$350,000	to under	\$450,000
Category L	\$450,000	to under	\$550,000
Category M	\$550,000	to under	\$650,000
Category N	\$650,000	to under	\$750,000
Category O	\$750,000	to under	\$850,000
Category P	\$850,000	to under	\$950,000
Category Q	\$950,000	to under	\$1,050,000
Category R	\$1,050,000	to under	\$1,150,000
Category S	\$1,150,000	to under	\$1,250,000
Category T	\$1,250,000	to under	\$1,350,000
Category U	\$1,350,000	to under	\$1,450,000
Category V	\$1,450,000	to under	\$1,550,000
Category W	\$1,550,000	to under	\$1,650,000
Category X	\$1,650,000	to under	\$1,750,000
Category Y	\$1,750,000	to under	\$1,850,000
Category Z	\$1,850,000	to under	\$1,950,000
Category AA	\$1,950,000	to under	\$2,050,000
Category BB	\$2,050,000	to under	\$2,150,000
Category CC	\$2,150,000	to under	\$2,250,000
Category DD	\$2,250,000	to under	\$2,350,000
Category EE	\$2,350,000	to under	\$2,450,000
Category FF	\$2,450,000	to under	\$2,550,000
Category GG	\$2,550,000	to under	\$2,650,000
Category HH	\$2,650,000	to under	\$2,750,000
Category II	\$2,750,000	to under	\$2,850,000
Category JJ	\$2,850,000	to under	\$2,950,000
Category KK	\$2,950,000	to under	\$3,050,000
Category LL	\$3,050,000	to under	\$3,150,000
Category MM	\$3,150,000	to under	\$3,250,000
Category NN	\$3,250,000	to under	\$3,350,000
Category OO	\$3,350,000	to under	\$3,450,000
Category PP	\$3,450,000	to under	\$3,550,000

Category QQ	\$3,550,000	to under	\$3,650,000
Category RR	\$3,650,000	to under	\$3,750,000
Category SS	\$3,750,000	to under	\$3,850,000
Category TT	\$3,850,000	to under	\$3,950,000
Category UU	\$3,950,000	to under	\$4,050,000
Category VV	\$4,050,000	to under	\$4,150,000
Category WW	\$4,150,000	to under	\$4,250,000
Category XX	\$4,250,000	to under	\$4,350,000
Category YY	\$4,350,000	to under	\$4,450,000
Category ZZ	\$4,450,000	to under	\$4,550,000
Category AAA	\$4,550,000	to under	\$4,650,000
Category BBB	\$4,650,000	to under	\$4,750,000
Category CCC	\$4,750,000	to under	\$4,850,000
Category DDD	\$4,850,000	to under	\$4,950,000
Category EEE	\$4,950,000	to under	\$5,050,000
Category FFF	\$5,050,000	to under	\$5,150,000
Category GGG	\$5,150,000	to under	\$5,250,000
Category HHH	\$5,250,000	to under	\$5,350,000
Category III	\$5,350,000	to under	\$5,450,000
Category JJJ	\$5,450,000	to under	\$5,550,000
Category KKK	\$5,550,000	to under	\$5,650,000
Category LLL	\$5,650,000	to under	\$5,750,000
Category MMM	\$5,750,000	to under	\$5,850,000
Category NNN	\$5,850,000	to under	\$5,950,000
Category OOO	\$5,950,000	to under	\$6,050,000
Category PPP	\$6,050,000	to under	\$6,150,000
Category QQQ	\$6,150,000	to under	\$6,250,000
Category RRR	\$6,250,000	to under	\$6,350,000
Category SSS	\$6,350,000	to under	\$6,450,000
Category TTT	\$6,450,000	to under	\$6,550,000
Category UUU	\$6,550,000	to under	\$6,650,000
Category VVV	\$6,650,000	to under	\$6,750,000
Category WWW	\$6,750,000	to under	\$6,850,000
Category XXX	\$6,850,000	to under	\$6,950,000
Category YYY	\$6,950,000	to under	\$7,050,000
Category ZZZ	\$7,050,000	to under	\$7,150,000
Category AAAA	\$7,150,000	to under	\$7,250,000
Category BBBB	\$7,250,000	to under	\$7,350,000
Category CCCC	\$7,350,000	to under	\$7,450,000
Category DDDD	\$7,450,000	to under	\$7,550,000
Category EEEE	\$7,550,000	to under	\$7,650,000
Category FFFF	\$7,650,000	to under	\$7,750,000
Category GGGG	\$7,750,000	to under	\$7,850,000
Category HHHH	\$7,850,000	to under	\$7,950,000
Category IIII	\$7,950,000	to under	\$8,050,000
Category JJJJ	\$8,050,000	to under	\$8,150,000
Category KKKK	\$8,150,000	to under	\$8,250,000
Category LLLL	\$8,250,000	to under	\$8,350,000

Category MMMM	\$8,350,000	to under	\$8,450,000
Category NNNN	\$8,450,000	to under	\$8,550,000
Category OOOO	\$8,550,000	to under	\$8,650,000
Category PPPP	\$8,650,000	to under	\$8,750,000
Category QQQQ	\$8,750,000	to under	\$8,850,000
Category RRRR	\$8,850,000	to under	\$8,950,000
Category SSSS	\$8,950,000	to under	\$9,050,000
Category TTTT	\$9,050,000	to under	\$9,150,000
Category UUUU	\$9,150,000	to under	\$9,250,000
Category VVVV	\$9,250,000	to under	\$9,350,000
Category WWWW	\$9,350,000	to under	\$9,450,000
Category XXXX	\$9,450,000	to under	\$9,550,000
Category YYYY	\$9,550,000	to under	\$9,650,000
Category ZZZZ	\$9,650,000	to under	\$9,750,000
Category AAAAA	\$9,750,000	to under	\$9,850,000
Category BBBBB	\$9,850,000	to under	\$9,950,000
Category CCCCC	\$9,950,000	to under	\$10,000,000
Category DDDDD	\$10,000,000	or over	

TABLE II

Category A	none		
Category B	\$1	to under	\$1,000
Category C	\$1,000	to under	\$5,000
Category D	\$5,000	to under	\$20,000
Category E	\$20,000	to under	\$50,000
Category F	\$50,000	to under	\$75,000
Category G	\$75,000	to under	\$100,000
Category H	\$100,000	to under	\$150,000
Category I	\$150,000	to under	\$250,000
Category J	\$250,000	to under	\$500,000
Category K	\$500,000	to under	\$750,000
Category L	\$750,000	to under	\$1,000,000
Category M	\$1,000,000	to under	\$1,250,000
Category N	\$1,250,000	to under	\$1,500,000
Category O	\$1,500,000	to under	\$1,750,000
Category P	\$1,750,000	to under	\$2,000,000
Category Q	\$2,000,000	to under	\$2,250,000
Category R	\$2,250,000	to under	\$2,500,000
Category S	\$2,500,000	to under	\$2,750,000
Category T	\$2,750,000	to under	\$3,000,000
Category U	\$3,000,000	to under	\$3,250,000
Category V	\$3,250,000	to under	\$3,500,000
Category W	\$3,500,000	to under	\$3,750,000
Category X	\$3,750,000	to under	\$4,000,000
Category Y	\$4,000,000	to under	\$4,250,000
Category Z	\$4,250,000	to under	\$4,500,000
Category AA	\$4,500,000	to under	\$4,750,000
Category BB	\$4,750,000	to under	\$5,000,000
Category CC	\$5,000,000	to under	\$5,250,000
Category DD	\$5,250,000	to under	\$5,500,000
Category EE	\$5,500,000	to under	\$5,750,000
Category FF	\$5,750,000	to under	\$6,000,000
Category GG	\$6,000,000	to under	\$6,250,000
Category HH	\$6,250,000	to under	\$6,500,000
Category II	\$6,500,000	to under	\$6,750,000
Category JJ	\$6,750,000	to under	\$7,000,000
Category KK	\$7,000,000	to under	\$7,250,000
Category LL	\$7,250,000	to under	\$7,500,000
Category MM	\$7,500,000	to under	\$7,750,000
Category NN	\$7,750,000	to under	\$8,000,000
Category OO	\$8,000,000	to under	\$8,250,000
Category PP	\$8,250,000	to under	\$8,500,000
Category QQ	\$8,500,000	to under	\$8,750,000
Category RR	\$8,750,000	to under	\$9,000,000
Category SS	\$9,000,000	to under	\$9,250,000

Category TT	\$9,250,000	to under	\$9,500,000
Category UU	\$9,500,000	or over	