



**NOTICE:** All information provided for items 1- 4 above must be updated as changes occur.

5. Since December 17<sup>th</sup> 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 municipalitfs pension system.
- + IF "YES", identify: (1) whom (the third party intermediary, agent, or lobbyist) was paid the compensation or employed by the *Contractor* or *Affiliated Entity*, (2) their specific duties 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**, (3) the official they communicated with, and (4) the dates of this service.

**ANSWER-NO**

6. Since December 17<sup>th</sup> 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?
- + IF "YES", identify the agent, officer, director or employee who made the solicitation and the municipal officials, candidates, political party or political committee who were solicited (to whom the solicitation was made).

**ANSWER-NO**

7. Since December 17<sup>th</sup>, 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**?
- + 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 , the date of the contribution, and the amount of the contribution.

**ANSWER-NO**

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**?
- + IF "YES", identify the individual with whom the relationship exists and give a detailed description of that relationship.

**\*\*NOTE:** A written letter is required from the **Requesting Municipality** acknowledging the relationship and consenting to its existence. The letter must be attached to this disclosure. Contact the **Requesting Municipality** to obtain this letter and attach it to this disclosure before submission.

**ANSWER-NO**

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**?

...+ IF "YES", Provide the name of the person conferring the gift, the person receiving the gift, the office or position of the person receiving the gift, specify what the gift was, and the date conferred.

**ANSWER-NO**

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
- 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.

...+ 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.

**ANSWER-NO**

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.

**ANSWER-NO**

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.

**ANSWER-NO ADDITIONAL INFORMATION REQUIRED**

Please provide the name(s) and position(s) of the person(s) participating in the completion of this Disclosure. **One of the individuals** identified by the *Contractor* in **Item #1** above must participate in completing this Disclosure and must sign the below verification attesting to the participation of those individuals named below.

**NAME: Joseph M Wolfram**

**POSITION: Senior Investment Consultant**

Joseph M Wolfram

SIGNATURE

**Senior Investment Consultant**

TITLE

**OCTOBER 21, 2022**

DATE

## VERIFICATION

I, Daniel Newhall, hereby state that I am a Principal for Vanguard Institutional Advisory Services, 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 Doylestown Township Pension System, 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.

*Daniel Newhall*

---

Signature

*November 1, 2022*

---

Date

**VAI and VFTC Board of Directors and Officers:****VFTC:**

<b>Director</b>	<b>Position</b>	<b>Entity</b>
Anaokar, Sam	Director	Vanguard Fiduciary Trust Company
Bisordi, John	Director	Vanguard Fiduciary Trust Company
Brancato, Matthew C.	Director	Vanguard Fiduciary Trust Company
James, John	Chairman & Director	Vanguard Fiduciary Trust Company
Miller, Jodi	Director	Vanguard Fiduciary Trust Company
Rollings, Michael	Director	Vanguard Fiduciary Trust Company

<b>Officer</b>	<b>Title</b>	<b>Entity</b>
Alwine, Christopher W.	Vice President	Vanguard Fiduciary Trust Company
Ameriks, John	Vice President	Vanguard Fiduciary Trust Company
Anaokar, Sam	Vice President	Vanguard Fiduciary Trust Company
Barikos, Amy	Vice President	Vanguard Fiduciary Trust Company
Barrickman, Josh C.	Vice President	Vanguard Fiduciary Trust Company
Bisordi, John E.	Vice President and General Counsel	Vanguard Fiduciary Trust Company
Bock, Barbara	Controller	Vanguard Fiduciary Trust Company
Brancato, Matthew C.	Vice President	Vanguard Fiduciary Trust Company
Buchanan, Christine	Vice President	Vanguard Fiduciary Trust Company
Buckley, Tara	Vice President and Assistant Secretary	Vanguard Fiduciary Trust Company
Burke, Claire	Vice President	Vanguard Fiduciary Trust Company
Butler, Donald M.	Vice President	Vanguard Fiduciary Trust Company
Comegys, Rodney C.	Vice President and Chief Investment Officer	Vanguard Fiduciary Trust Company
Cosby, Caroline	Chief Audit Executive and Auditor	Vanguard Fiduciary Trust Company
Davis, Gregory	Vice President	Vanguard Fiduciary Trust Company
Devereux, Sara	Vice President	Vanguard Fiduciary Trust Company
Franquin, Christine	Vice President	Vanguard Fiduciary Trust Company
Galloway, John	Vice President	Vanguard Fiduciary Trust Company
Green, Sarah	Bank Secrecy Act Compliance Officer	Vanguard Fiduciary Trust Company
Jakubowski, Paul M.	Vice President	Vanguard Fiduciary Trust Company
James, John	Chairman, President, and Chief Executive Officer	Vanguard Fiduciary Trust Company
Johnson, Jeffrey	Vice President	Vanguard Fiduciary Trust Company
Kearney, James	Vice President	Vanguard Fiduciary Trust Company
Laursen, Amy M.	Vice President	Vanguard Fiduciary Trust Company
Ludt, Ryan E.	Vice President	Vanguard Fiduciary Trust Company

Maack, Andrew H.	Vice President	Vanguard Fiduciary Trust Company
MacBride, David	Treasurer	Vanguard Fiduciary Trust Company
Mahoney, Peter	Assistant Treasurer	Vanguard Fiduciary Trust Company
Malloy, Paul	Vice President	Vanguard Fiduciary Trust Company
Miller, Jodi	Vice President	Vanguard Fiduciary Trust Company
Morales Singh, Beth	Secretary	Vanguard Fiduciary Trust Company
Mosley, Armond	Vice President	Vanguard Fiduciary Trust Company
Nagar, Manish	Chief Information Security Officer	Vanguard Fiduciary Trust Company
Napier, Stephanie L.	Vice President	Vanguard Fiduciary Trust Company
Narayanan, Arvind	Vice President	Vanguard Fiduciary Trust Company
Newhall, Daniel W.	Vice President	Vanguard Fiduciary Trust Company
O'Reilly, Gerard P.	Vice President	Vanguard Fiduciary Trust Company
Perre, Michael	Vice President	Vanguard Fiduciary Trust Company
Petty, David	Chief Financial Officer	Vanguard Fiduciary Trust Company
Rollings, Michael	Vice President	Vanguard Fiduciary Trust Company
Saxena, Neena	Vice President	Vanguard Fiduciary Trust Company
Shaykevich, Daniel	Vice President	Vanguard Fiduciary Trust Company
Smolenski, Michael	Vice President	Vanguard Fiduciary Trust Company
Van Ommeren, David	Vice President	Vanguard Fiduciary Trust Company

**VAI:**

<b>Director</b>	<b>Position</b>	<b>Entity</b>
Benchener, Matthew J.	Chairman & Director	Vanguard Advisers, Inc.
Bisordi, John	Director	Vanguard Advisers, Inc.
Brancato, Matthew C.	Director	Vanguard Advisers, Inc.
Rampulla, Thomas M.	Director	Vanguard Advisers, Inc.
Risi, Karin A.	Director	Vanguard Advisers, Inc.
Rollings, Michael	Director	Vanguard Advisers, Inc.

<b>Officer</b>	<b>Title</b>	<b>Entity</b>
Bisordi, John E.	General Counsel and Vice President	Vanguard Advisers, Inc.
Bock, Barbara	Controller	Vanguard Advisers, Inc.
Buckley, Tara	Vice President and Assistant Secretary	Vanguard Advisers, Inc.
Burke, Claire	Chief Compliance Officer	Vanguard Advisers, Inc.
Cleborne, Jon	Vice President	Vanguard Advisers, Inc.
Corey, Danielle	Vice President	Vanguard Advisers, Inc.
Davis, Gregory	Vice President	Vanguard Advisers, Inc.

Jakubowski, Paul M.	Vice President	Vanguard Advisers, Inc.
Morales Singh, Beth	Secretary	Vanguard Advisers, Inc.
Muir, Amanda	Vice President	Vanguard Advisers, Inc.
Nagar, Manish	Chief Information Security Officer	Vanguard Advisers, Inc.
Petty, David	Chief Financial Officer	Vanguard Advisers, Inc.
Rampulla, Thomas M.	Vice President	Vanguard Advisers, Inc.
Risi, Karin A.	Vice President	Vanguard Advisers, Inc.
Williams, Massy	Vice President	Vanguard Advisers, Inc.
Alwine, Christopher W.	Vice President	Vanguard Advisers, Inc.
Benchener, Matthew J.	Vice President and Municipal Advisor CEO-Designee	Vanguard Advisers, Inc.
Brancato, Matthew C.	Vice President	Vanguard Advisers, Inc.
Brestowski, Amber	Vice President	Vanguard Advisers, Inc.
Buckley, Mortimer J.	President	Vanguard Advisers, Inc.
Concannon, Brian	Vice President	Vanguard Advisers, Inc.
MacBride, David	Treasurer	Vanguard Advisers, Inc.
Marisa, Mindi	Vice President	Vanguard Advisers, Inc.
Newhall, Daniel W.	Vice President	Vanguard Advisers, Inc.
Rollings, Michael	Vice President	Vanguard Advisers, Inc.
Saxena, Neena	Vice President	Vanguard Advisers, Inc.