

MASSACHUSETTS STATE ETHICS COMMISSION

One Ashburton Place, Room 619

Boston, MA 02108-1501

Telephone: (617) 371-9500

STATEMENT OF FINANCIAL INTERESTS FOR CALENDAR YEAR 2014

INSTRUCTION BOOKLET

THE BENEFITS OF FILING ELECTRONICALLY

While the Commission continues to accept manual filing of a paper Statement of Financial Interests (“SFI”), we encourage electronic filing. Filing electronically will assist you in submitting a complete and accurate SFI. Each question is set up to perform certain validation functions to ensure that you provide all the required information. Once you complete the SFI, but prior to submitting it to the Commission, the electronic application will check to make sure that you have answered each question. If you did not answer a question, the electronic application will inform you which question you missed. Filing electronically may save you time in later years after you complete your initial SFI. For subsequent filings, your SFI will contain the prior year’s data, which you can then update by adding or deleting information.

REQUIREMENTS FOR ELECTRONIC FILING

In order to file electronically, you must have an email address and Internet access. We have asked your agency to provide the Commission with your office email address and Employee ID. If we received this information from your agency, the Commission will send you an email with your encrypted Password and Employee ID. Alternatively, you can register to file electronically by going to www.eth.state.ma.us and following the instructions found in the last paragraph on the login page.

If you are a **CANDIDATE FOR PUBLIC OFFICE** and wish to file electronically, you must first register with the Commission. To register, go to www.eth.state.ma.us and follow the instructions found in the last paragraph on the login page or call Robert Milt, the Commission’s Financial Disclosure Administrator and Analyst, at (617) 371-9512.

Words in capitals and bold-face type in this Instruction Booklet are defined terms. The definitions of these terms appear at the end of this Instruction Booklet.

HOW TO ACCESS AND FILE YOUR SFI ELECTRONICALLY

Access the Internet via your web browser and type www.eth.state.ma.us in the address box. There are two ways to log in. If you received an email with your Employee ID and Password,

you can log in by entering your Employee ID and Password in the appropriate fields and then clicking the “Submit” button.

You can also log in by clicking on the *Name Log In* link located under the “Submit” button. Once you are at the *Name Log In* page, select the first letter of your last name. Enter the next letters of your last name until you locate your name in the database. Once you find your name, enter the Password emailed to you by the Commission in the appropriate field, and then click on the “Submit” button to log in.

If you are filing electronically for the first time, your Password is encrypted and case-sensitive. We strongly recommend that you copy and paste your Password from the email the Commission sent you.

Once you successfully log in, you should change your Password immediately. To change your Password, click on the *Change Password* link located under the green toolbar. If you forget your Password, you can contact the Commission and request to have it emailed to you.

COMPLETING YOUR SFI ELECTRONICALLY

To open a blank SFI for calendar year 2014, look under the green toolbar for the *Presently Open Awaiting Completion* link. Look to the right of the red arrow, place your mouse/pointer on the number 2014, and click.

Certain personal data (name, current home address, etc.) will automatically be populated for you. You can update your home address if necessary. If you make a change to Question 1, you must click on the “Save” button to retain the new information.

Each question will appear on a separate screen. There are a total of 30 questions. Many of the questions have drop down fields that will require you to select data rather than type it.

To view the instructions for a particular question, click on the link for *Instructions for Question*.

If a question does not apply, click on *Not Applicable for Filing Year 2014*.

If a question does apply, complete the question, and then **click on the “Save” button to retain your answer to each question.** You must click on the “Save” button before continuing on to the next question or you will lose any information entered.

The bottom of each screen has the following navigation buttons:

Reset	Save	Save/Next	Print	Submit	Next
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Reset will clear all data from the specific question.

Save is for filers who have more than one answer to each question. For example, if you need to report ownership of more than one piece of property, you should enter the information about the first piece of property and then click on “Save.” This will save the data you entered, clear the screen and permit you to enter data for a second property.

Save/Next will save the data you entered and move to the next question.

Print will allow you to print your SFI.

Submit will send your SFI electronically to the Commission if you have answered **all** of the questions. Submit should be the last button you click on after you have completed your SFI to finish the process.

Next will allow you to navigate from one question to another, but will **not** save any entries you made.

SUBMITTING YOUR SFI ELECTRONICALLY

If you did not answer all of the required questions (except for Question 2, which you are required to answer only if you are a **CANDIDATE FOR PUBLIC OFFICE**), a list of the question(s) you did not answer will appear. To go back to the missed question, click on the question listed or click on the question number that appears at the top of the page.

You can print your SFI before submission by clicking on the “Print” button. After you have submitted your SFI, you will be able to print a copy of it, including the certification page, showing the date filed. To print a copy of your completed SFI, click on the “2014” link located under the blue toolbar entitled *Presently Completed Statements of Financial Interests* on the log in/log off page. To print a receipt, click on the *Print Receipt* link. If you are a **CANDIDATE FOR PUBLIC OFFICE**, you must submit a copy of your receipt with your nomination papers.

FOR ELECTRONIC FILING ASSISTANCE

You may request assistance for technical problems with your electronic filing by calling Tony Webb, the Commission’s Information Technology Specialist, at (617) 371-9526, or Robert Milt, the Commission’s Financial Disclosure Administrator and Analyst, at (617) 371-9512. If you need non-technical assistance with your electronic or manual filing, please call Lauren Duca, the Commission’s Deputy Chief/SFI, at (617) 371-9503. You may also send an e-mail to the Commission at SFI_Filer@eth.state.ma.us.

GENERAL FILING INFORMATION

WHO MUST FILE AN SFI

The Financial Disclosure Law, G.L. Chapter 268B, requires that every **DESIGNATED PUBLIC EMPLOYEE, PUBLIC OFFICIAL** and **CANDIDATE FOR PUBLIC OFFICE** file an annual SFI. **DESIGNATED PUBLIC EMPLOYEES** and **PUBLIC OFFICIALS** are required to file an SFI for the calendar year in which they left governmental service *unless* they served for less than thirty (30) days in that year.

DESIGNATED PUBLIC EMPLOYEE includes state and county employees who are designated pursuant to Chapter 268B as holding **MAJOR POLICYMAKING POSITIONS** in a **GOVERNMENTAL BODY**. The Commission’s Regulations defining a **DESIGNATED**

PUBLIC EMPLOYEE appear in 930 CMR 2.00 *et seq.* which is available on the Commission's website at www.mass.gov/ethics.

PUBLIC OFFICIAL is an individual who holds a public office, whether by election or appointment. A **PUBLIC OFFICE** is a position for which one is nominated at a state primary or chosen at a state election, excluding the positions of Senator and Representative in the United States Congress and the office of regional district school committee member elected district-wide.

CANDIDATE FOR PUBLIC OFFICE is an individual who seeks nomination or election to any position for which one is nominated at a state primary or chosen at a state election, excluding the positions of Senator or Representative in the United States Congress and the office of regional district school committee member elected district-wide.

WHEN TO FILE

Your SFI must be received by the Commission no later than 5:00 p.m. if filing manually, or midnight if filing electronically, on the deadline dates listed below. SFIs received after these deadlines will be regarded as late and may subject you to civil penalties.

DESIGNATED PUBLIC EMPLOYEES *who have previously filed an SFI* must file an SFI for calendar year ("CY") 2014 no later than 5:00 p.m. if filing manually, or midnight if filing electronically, on or before **May 1, 2015**, if they served for thirty (30) days or more in 2014. If they left government service in 2014, but served as a **DESIGNATED PUBLIC EMPLOYEE** for thirty (30) days or more in 2014, they must file an SFI for CY 2014.

DESIGNATED PUBLIC EMPLOYEES *who are newly appointed in 2015* must file an SFI for CY 2014 within thirty days of beginning employment. Newly appointed **DESIGNATED PUBLIC EMPLOYEES** should obtain from their agency and then complete the New Public Employee Acknowledgement form ("New Public Employee Form") when assuming a filing position. The New Public Employee Form should then be scanned in by the agency and sent to the Commission by email to SFI_Designator@eth.state.ma.us.

PUBLIC OFFICIALS must file an SFI for CY 2014 no later than 5:00 p.m. if filing manually, or midnight if filing electronically, on or before **May 26, 2015**, if they held office during 2014 or were elected to office in 2014.

Former **PUBLIC OFFICIALS** must file an SFI for CY 2014 no later than 5:00 p.m. if filing manually, or midnight if filing electronically, on or before **May 26, 2015**, if they served for thirty (30) days or more in 2014.

CANDIDATES FOR PUBLIC OFFICE must file an SFI on or prior to the date on which they submit their nomination papers to the Secretary of State's Office. Write-in or sticker **CANDIDATES** must file an SFI within three (3) days after filing a Statement of Organization with the Office of Campaign and Political Finance.

PUBLIC ACCESS TO SFIs

Chapter 268B provides that any SFI filed with the Commission shall be available for public inspection and copying upon written request of any individual. Such requests shall be honored only if accompanied by proof of the requesting individual's identity. The law requires the Commission to forward a copy of such request to the individual whose SFI has been examined.

The Commission will redact those portions of an SFI to the extent required by the Public Records Law before releasing the form if requested.

If applicable, do NOT include the following information in any of your answers:

- The name of any **IMMEDIATE FAMILY** member except in Question 1. Instead, put, e.g., “Spouse,” “Spouse and Child(ren)” or “Child(ren).”
- The name of a **BUSINESS** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Company,” “Spouse’s Name Corp.,” “Child(ren)’s Name Partnership,” “Other Family Member’s Name LLC” or “Other Family Member Home Address Inc.”
- The name of a grantor, trustee or beneficiary of a **TRUST** if it is *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”
- The name of a **TRUST** if it incorporates your home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of a **TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

WHAT YOU ARE REQUIRED TO REPORT

Chapter 268B requires filers to report certain information about themselves and their **IMMEDIATE FAMILY** members. Specific instructions explain each question in the SFI. Carefully review the Instructions as you respond to each question, keeping in mind several key points:

- Certain information pertaining to your **IMMEDIATE FAMILY** members (i.e., spouse residing in filer's household and any dependent child(ren) residing in filer's household) must be included.
- The SFI must be complete and accurate to the best of your knowledge. If a question is not applicable or the answer is none, check “Not Applicable.”
- You are not required to disclose information that is privileged by law. If you assert a legal privilege in whole or in part to the answer for any question, you must identify each question where information has been omitted.
- If you are filing manually and extra space is needed to complete a response, attach additional pages, clearly noting the question to which the information relates.

FILING MANUALLY

Manually filed SFIs must be submitted by mail or in person to the State Ethics Commission at:

One Ashburton Place, Room 619
Boston, MA 02108-1501

If you are filing manually and mail your SFI, you must submit an original SFI to the Commission. If you would like a receipt, you must submit an original, one (1) copy of your SFI and a stamped

self-addressed envelope. The Commission will date-stamp the copy of your SFI and return it to you. If a copy of your SFI and the envelope are not provided, the Commission cannot mail you a receipt.

If you are filing in person, you must submit an original SFI to the Commission. If you would like a receipt, you must submit an original and one (1) copy of your SFI. If you do not bring a copy with you, the Commission will assess a reasonable copying charge.

PENALTIES

NON-FILING OF AN SFI

A filer is responsible for filing an accurate and complete SFI by the specified deadline. Failure to do so may result in civil and/or criminal penalties.

- **DESIGNATED PUBLIC EMPLOYEES** shall not be allowed to continue in their duties or to receive compensation from public funds unless they have filed an SFI with the Commission.
- The Commission will notify your agency head immediately if you fail to timely file.
- Civil penalties of up to \$10,000 may be imposed for each violation. Criminal penalties for the willful submission of a materially false SFI include fines of up to \$10,000 or imprisonment in a state prison for not more than five years, or in a jail or house of correction for not more than two and a half years, or both.

LATE FILING OF AN SFI AND THE PENALTY SCHEDULE

Chapter 268B requires the Commission to notify each late filer. If a filer does not file the required SFI within ten (10) calendar days after receiving a late notice, the Commission will commence enforcement proceedings. **Failure to timely file is a matter of public record and will be published accordingly.**

If a filer fails to file within ten (10) calendar days after receiving a late notice from the Commission, a monetary penalty will begin to accrue according to the following penalty schedule established by the Commission:

1-10 days late	\$100
11-20 days late	\$200
21-30 days late	\$300
31-40 days late	\$400
41-50 days late	\$500
51-60 days late	\$600

61-70 days late	\$700
71-80 days late	\$800
81-90 days late	\$900
91-100 days late	\$1,000
101- 110 days late	\$1,100
111-120 days late	\$1,200
121 days late to the day before an Order to Show Cause is issued	\$1,250
Date an Order to Show Cause is issued (or about the third week in September for Appointed Officials or the third week in October for Elected Officials)	\$2,500
Date a Decision and Order is issued by the Commission	Up to \$10,000

DEFINITIONS

Certain terms from G.L. Chapter 268B, the Financial Disclosure Law, are printed in the SFI Form and Instructions. These terms can be readily identified because they are capitalized and in bold type throughout the Instructions. The definitions of those terms are located at the end of this Instruction Booklet. Refer to these definitions when reading the Instructions and completing your SFI.

SPECIFIC INSTRUCTIONS FOR EACH QUESTION

Except for Question 2, as noted below, all questions must be completed.

Instructions for Question 1

Provide your current home address. This will be the address to which the Commission will send all correspondence, including the notice that must be completed by an individual requesting to review your SFI. Former **DESIGNATED PUBLIC EMPLOYEES** and former **PUBLIC OFFICIALS** should also include their private email address. This information will be redacted from your SFI if a copy of it is provided to a requestor.

Instructions for Question 2

Answering Question 2 will inform the Commission that you are a **CANDIDATE FOR PUBLIC OFFICE**. If you are NOT filing as a **CANDIDATE FOR PUBLIC OFFICE**, skip this question.

Instructions for Question 3

If you are not filing an SFI as a **CANDIDATE FOR PUBLIC OFFICE**, the answer to this question indicates the reason you are otherwise required to file an SFI. You should list any position(s) you held in 2014 or began holding in 2015 as a **DESIGNATED PUBLIC EMPLOYEE** or a **PUBLIC OFFICIAL**. For each position, report the dates of employment and the **AMOUNT** of **INCOME** by category (see page 24). If you were appointed in calendar year 2015 to a **MAJOR POLICYMAKING POSITION**, and therefore, did not earn **INCOME** in that position in 2014, complete the question, but check the “Income Not Applicable for 2014” box. Any other government position(s) held during 2014, whether at the state, county or municipal level, must be reported in Question 4.

Instructions for Question 4

Report any other government position(s) held in 2014 by you and/or an **IMMEDIATE FAMILY** member in any federal, state, county, district or municipal agency, whether compensated or uncompensated, full- or part-time. If applicable, do NOT include the name of any **IMMEDIATE FAMILY** member in your answer. Instead, put, e.g., “Spouse” or “Child.” This question also includes work performed pursuant to any consulting or contractual agreement with any such agency. **INCOME** from any of the reported position(s) should be reported for the filer only. **INCOME** should be reported only by a category of value (see page 24).

Instructions for Question 5

Identify each **BUSINESS** with which you and/or an **IMMEDIATE FAMILY** member were associated in 2014 as an employee, or as a partner, sole proprietor, officer, director or in any similar managerial capacity, whether compensated or uncompensated, full- or part-time. If applicable, do NOT include the following information in your answer:

- The name of any **IMMEDIATE FAMILY** member. Instead, put “Spouse” or “Child(ren).”
- The name of the **BUSINESS** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put “Home Address Company,” “Spouse’s Name Corp.,” “Child(ren)’s Name Partnership,” “Other Family Member’s Name LLC” or “Other Family Member Home Address Inc.”
- The address of the **BUSINESS** if it is the same as your current home address or the current home address of *any* family member. Instead, put “Home Address” or “Other Family Member Home Address.”

Report any information relating to **TRUSTS** in Questions 14-21.

Do not identify customers or clients of a sole proprietorship. If you are a sole proprietor, the **INCOME** you are required to report is determined by subtracting expenses from gross revenues as reported on tax returns. If you did not earn any **INCOME** as a sole proprietor, the **AMOUNT** of any loss should not be reported. **INCOME** should be reported only by a category of value (see page 24).

Do not identify any **BUSINESSES** with which you and/or an **IMMEDIATE FAMILY** member were associated with *only* as incorporators or corporators.

EXCLUDE: Distributions under pension, profit-sharing or other retirement plans qualified under Section 401 *et seq.* of the Internal Revenue Code.

Instructions for Question 6

Identify any **BUSINESS** in which you and/or an **IMMEDIATE FAMILY** member owned more than 1% of the **EQUITY** at any time during 2014. In answering this question, do **NOT** include the following information in your answer:

- The name of the **BUSINESS** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Company,” “Spouse’s Name Corp.,” “Child(ren)’s Name Partnership,” “Other Family Member’s Name LLC” or “Other Family Member Home Address Inc.”
- The address of the **BUSINESS** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

In answering this question, note the following points:

EQUITY in a business does not include pension or profit-sharing plans qualified under Section 401 *et seq.* of the Internal Revenue Code.

EQUITY in a **BUSINESS** owned by an estate or partnership is considered owned by its beneficiaries or partners in the same proportion as their beneficial or partnership interests.

If you and/or an **IMMEDIATE FAMILY** member are a sole proprietor, and, as such, you and/or an **IMMEDIATE FAMILY** member own more than 1% of the **EQUITY** in another **BUSINESS**, you must report that ownership interest also.

If you and/or an **IMMEDIATE FAMILY** member own 10% or more of the **EQUITY** of a **BUSINESS**, and that **BUSINESS** owns **EQUITY** in another **BUSINESS**, then you and/or your **IMMEDIATE FAMILY** member will be considered to own a proportional share of **EQUITY** in the second **BUSINESS**. For example: You own 20% of the **EQUITY** in Business A. Business A owns 60% of the **EQUITY** in Business B. You are considered to own 12% (i.e., 20% of 60%) of the **EQUITY** in Business B.

Instructions for Question 7

Identify any **EQUITY** in a **BUSINESS** (reported in your answers to Question 5 or 6) which you transferred to any **IMMEDIATE FAMILY** member at any time during 2014. If applicable, do **NOT** include the following information in your answer:

- The name of any **IMMEDIATE FAMILY** member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren)” or “Child(ren).”
- The name of the **BUSINESS** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Company,” “Spouse’s Name Corp.,” “Child(ren)’s Name Partnership,” “Other Family Member’s Name LLC” or “Other Family Member Home Address Inc.”

Report the transfer of any such **EQUITY** only if made by you.

Instructions for Question 8

Identify any **BUSINESS** with which you (not an **IMMEDIATE FAMILY** member) were previously associated and with which you had an understanding at any time during 2014 regarding employment at any future time. If applicable, do NOT include the following information in your answer:

- The name of the **BUSINESS** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Company,” “Spouse’s Name Corp.,” “Child(ren)’s Name Partnership,” “Other Family Member’s Name LLC” or “Other Family Member Home Address Inc.”
- The address of the **BUSINESS** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

Instructions for Question 9

This question requires reporting of gifts only if received from certain sources, as explained below. You do not have to report every gift received in 2014 - - only gifts from the sources described below.

Identify any source, as described below, which, at any time in 2014, gave to you and/or an **IMMEDIATE FAMILY** member any **GIFT** having a fair market value in excess of \$100, either individually or in the aggregate. Do NOT report the **AMOUNT** of any **GIFT** received by an **IMMEDIATE FAMILY** member. If applicable, do NOT include the name of any **IMMEDIATE FAMILY** member in your answer. Instead, put “Spouse,” “Spouse and Child(ren)” or “Child(ren).”

What is a GIFT?

A **GIFT** is a payment, entertainment, subscription, advance, services or anything of value, unless consideration of equal or greater value is given in exchange for it. A **GIFT** may include: Any discount that is not available to the general public; a loan that does not have to be repaid in full; a loan that is not a commercially reasonable loan made in the ordinary course of business; compensation if no services were rendered in exchange; or **REIMBURSEMENTS** (reported in Question 11) if they exceed the expenses they purport to cover.

A **GIFT** shall NOT include: A political contribution reported as required by law; a commercially reasonable loan made in the ordinary course of business; anything of value received by inheritance; or a gift received from a member of the reporting person’s **IMMEDIATE FAMILY** or from a relative within the third degree of consanguinity of the reporting person or of the reporting person’s spouse or from the spouse of any such relative. Do NOT report such items as **GIFTS**.

How to Determine the Value of Tickets and Passes

Tickets and passes to movies, theaters, athletic events, etc., are **GIFTS**, and their value should be determined as follows. If a price or similar amount appears on the ticket or pass, that is its value. If a ticket or pass has no face value but can be purchased, its value is the price at which it is sold. If a ticket or pass has no face or market value but entitles the holder to attend a specific number of

events, or otherwise confers a privilege which can itself be readily valued (e.g., \$1 off each of 10 movie tickets – the value is \$10), its value is the value of the privilege conferred. If a ticket or pass fits none of these categories, its value is indeterminable, and you should report receipt of the **GIFT** and enter “Indeterminable” as its value.

When to Report a GIFT

GIFTS, as described above, must be reported when any of the following conditions are met:

1. *If You are Filing as a **PUBLIC OFFICIAL**:* A **GIFT** must be reported if its source was a **PERSON** regulated by the state, or a **PERSON** having a direct interest in legislation or legislative action or a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY**, at any time during 2014, or if the source was an officer, director, trustee, general partner or proprietor of such a **PERSON**, or one serving in a similar managerial capacity in such a **PERSON**.
2. *If You are Filing as a **DESIGNATED PUBLIC EMPLOYEE**:* A **GIFT** must be reported if, at any time during 2014, a **GOVERNMENTAL BODY** which employed you regulated the source, or the source had a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY** which employed you.
3. *If You are Filing as a **PUBLIC OFFICIAL** and **DESIGNATED PUBLIC EMPLOYEE**:* Respond to this question as a **PUBLIC OFFICIAL** (see No. 1 above).

You are required to report **GIFTS** received at any time during 2014 from the sources described above, even if received before you entered, or after you left, government service. You are also required to report **GIFTS** received at any time during 2014 from any source having the requisite direct interest, as described above, at any time during 2014, whether or not it had such an interest at the time the **GIFT** was made.

Reporting the Donor/Source of a GIFT

If the donor was an individual who gave in his individual capacity, list his name and address (in the spaces marked “Name of Source” and “Address of Source”).

If the donor was an individual, but is affiliated with a **PERSON** that has the requisite direct interest as described above, list the donor’s name and address (in the spaces marked “Name of Source” and “Address of Source”) and the name of the **PERSON** as the affiliation (in the space marked “Affiliation of Source”).

If the **GIFT** was given by an individual on behalf of a **PERSON**, list the **PERSON**’s name and address (in the spaces marked “Name of Source” and “Address of Source”). **GIFTS** given by an individual on behalf of a **PERSON** include **GIFTS** for which the individual is reimbursed in whole or in part.

Instructions for Question 10

This question requires reporting of honoraria only if received from certain sources, as explained below. You do not have to report every honorarium received in 2014 - - only honoraria from the sources described below.

Identify any source, as described below, which, at any time in 2014, gave to you and/or an **IMMEDIATE FAMILY** member any **HONORARIUM** in excess of \$100, either individually or in the aggregate. If applicable, do NOT include the name of any **IMMEDIATE FAMILY** member in your answer. Instead, put "Spouse," "Spouse and Child(ren)" or "Child(ren)." In answering this question, note the following: Do not report the **AMOUNT** of any **HONORARIUM** received by an **IMMEDIATE FAMILY** member.

What is an HONORARIUM?

An **HONORARIUM** is the payment of money or anything of value as consideration for an appearance, speech, the writing of an article, or other similar activity.

If, in addition to the **HONORARIUM**, you were reimbursed for the cost of travel, accommodations, meals or other expenses incurred in connection with the appearance, speech, article or other similar activity, you should report the amount of any such **REIMBURSEMENT** in Question 11.

When to Report an HONORARIUM

HONORARIA, as described above, must be reported when any of the following conditions are met:

1. *If You are Filing as a PUBLIC OFFICIAL:* An **HONORARIUM** must be reported if, at any time during 2014, the source was a **PERSON** having a direct interest in legislation or legislative action or a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY** which employed you at any time in 2014, or the source was a **LEGISLATIVE AGENT**.
2. *If You are Filing as a DESIGNATED PUBLIC EMPLOYEE:* An **HONORARIUM** must be reported if, at any time during 2014, the source was a **PERSON** having a direct interest in legislation or legislative action or a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY** which employed you at any time in 2014, or the source was a **LEGISLATIVE AGENT**, or if a **GOVERNMENTAL BODY** which employed you at any time during 2014 regulated the source.
3. *If You are Filing as a PUBLIC OFFICIAL and a DESIGNATED PUBLIC EMPLOYEE:* Respond to this question as a **PUBLIC OFFICIAL** (see No. 1 above).

You are required to report **HONORARIA** received at any time during 2014 from a **LEGISLATIVE AGENT** or from any of the sources described above, even if received before you entered, or after you left, government service. You are also required to report **HONORARIA** received at any time during 2014 from any source having the requisite direct interest, as described above, at any time during 2014, whether or not it had such an interest at the time the **HONORARIA** was paid.

Reporting the Donor/Source of an HONORARIUM

Report the name and address of the source of an **HONORARIUM**. The source is the **PERSON** that paid you. Identify, as the source's representative, the name of the **PERSON** who extended the invitation to you to appear, speak, write an article, etc. If a **LEGISLATIVE AGENT** is the source, identify his or her client.

Instructions for Question 11

This question requires reporting of reimbursements of expenses only if received from certain sources, as explained below. You do not have to report every reimbursement received in 2014 - - only reimbursements from the sources described below.

Identify any source, as described below, which, at any time in 2014, gave to you and/or an **IMMEDIATE FAMILY** member any **REIMBURSEMENT** in excess of \$100, either individually or in the aggregate. If applicable, do NOT include the name of any **IMMEDIATE FAMILY** member in your answer. Instead, put "Spouse," "Spouse and Child(ren)" or "Child(ren)." In answering this question, note the following: Do not report the **AMOUNT** of any **REIMBURSEMENT** received by an **IMMEDIATE FAMILY** member.

*What is a **REIMBURSEMENT**?*

A **REIMBURSEMENT** is a payment for money expended or to be expended (e.g., travel, meals or lodging). A **REIMBURSEMENT** must be for actual expenses incurred or to be incurred.

A **REIMBURSEMENT** shall NOT include: Any **REIMBURSEMENT** for travel related to any government position held by you in 2014, received from sources other than those described below, and any **REIMBURSEMENT** from any one source which, in the aggregate, has a value of \$100 or less.

*When to Report a **REIMBURSEMENT***

REIMBURSEMENTS, as described above, must be reported when any of the following conditions are met:

1. *If You are Filing as a **PUBLIC OFFICIAL**:* A **REIMBURSEMENT** must be reported if, at any time during 2014, the source was a **PERSON** having a direct interest in legislation or legislative action or a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY** which employed you at any time in 2014, or the source was a **LEGISLATIVE AGENT** or **EXECUTIVE AGENT**.
2. *If You are Filing as a **DESIGNATED PUBLIC EMPLOYEE**:* A **REIMBURSEMENT** must be reported if, at any time during 2014, the source was a **PERSON** having a direct interest in legislation or legislative action or a **DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY** which employed you at any time in 2014, or the source was a **LEGISLATIVE AGENT** or **EXECUTIVE AGENT**, or a **GOVERNMENTAL BODY** which employed you at any time during 2014 regulated the source.
3. *If You are Filing as a **PUBLIC OFFICIAL** and a **DESIGNATED PUBLIC EMPLOYEE**:* Respond to this question as a **PUBLIC OFFICIAL** (see No. 1 above).

You are required to report **REIMBURSEMENTS** received at any time during 2014 from a **LEGISLATIVE AGENT** or **EXECUTIVE AGENT** or from any of the sources described

above, even if received before you entered, or after you left, government service. You are also required to report **REIMBURSEMENTS** received at any time during 2014 from any source having the requisite direct interest, as described above, at any time during 2014, whether or not it had such an interest at the time the **REIMBURSEMENT** was paid.

*Reporting the Donor/Source of a **REIMBURSEMENT***

Report the name and address of the source of a **REIMBURSEMENT**. The source is the **PERSON** that paid you. Identify, as the source's representative, the name of the **PERSON** who extended the invitation to you to appear, speak, write an article, etc. If a **LEGISLATIVE AGENT** or **EXECUTIVE AGENT** is the source, identify his or her client.

Instructions for Question 12

Identify each **SECURITY** issued by the Commonwealth of Massachusetts or any public agency thereof or county or municipality located in Massachusetts, owned by you and/or an **IMMEDIATE FAMILY** member with a fair market value in excess of \$1,000, as of December 31, 2014, and report any **INCOME** received by you from such security at any time during 2014, if such **INCOME** was in excess of \$1,000. **INCOME** should be reported only by a category of value (see page 24).

Note: Sections 7 and 14 of G.L. Chapter 268A, the Conflict of Interest Law, place some restrictions on ownership of state bonds by state employees, and ownership of county bonds by county employees. If you are a state employee who owns a state bond, or if you are a county employee who owns a county bond, you may also need to file a disclosure of ownership as required by Chapter 268A, in addition to disclosing such ownership on your SFI. If this is your situation, please call the Commission's Legal Division at (617) 371-9500 for advice on how to make the required disclosure.

Instructions for Question 13

List all **SECURITIES** and other **INVESTMENTS** with a fair market value in excess of \$1,000, beneficially owned by you and/or an **IMMEDIATE FAMILY** member, whether directly or through a partnership, corporation or estate, as of December 31, 2014. If applicable, do NOT include the name of any **IMMEDIATE FAMILY** member in your answer. Instead, put "Spouse," "Spouse and Child(ren)" or "Child(ren)." If you own any assets through a **TRUST**, report that information in Questions 14-21. Any **INCOME** derived by you in 2014 in excess of \$1,000 from **SECURITIES** issued by the Commonwealth or any public agency thereof or county or municipality located in Massachusetts, should be reported in Question 12.

If you share an interest in a **SECURITY** or **INVESTMENT** with another **PERSON** as a joint tenant, the fair market value of your interest is the full value of that undivided interest. If you and/or an **IMMEDIATE FAMILY** member have a proportional interest in an entity owning a **SECURITY**, then you and/or your **IMMEDIATE FAMILY** member will be considered to have a proportional share of interest in the **SECURITY**. For example: You own a 20% interest in a partnership. You are considered to own a 20% interest in the **SECURITIES** held by the partnership.

List the **PERSON** who issued the **SECURITY** owned by you and/or an **IMMEDIATE FAMILY** member. In general, the stock in a corporation is issued by that corporation; interests

in a limited partnership are issued by that partnership; bonds, notes, and other evidences of debt are issued by the debtor; interests in mutual funds are issued by those funds.

Do not report the issuer's principal place of business or state of incorporation for a publicly traded stock. If publicly traded, enter "Not Applicable."

Report ownership of U.S. Treasury Bonds and bonds issued by any state other than the Commonwealth of Massachusetts. Ownership of bonds issued by the Commonwealth of Massachusetts, including any public agency thereof or county or any municipality located in Massachusetts, should be reported in Question 12.

If you and/or an **IMMEDIATE FAMILY** member or a **BUSINESS** in which you and/or an **IMMEDIATE FAMILY** member have an interest, own any **SECURITIES** that are held by an agent or a nominee, you and/or the **IMMEDIATE FAMILY** member are considered to be the owner(s) of record and must disclose this information.

EXCLUDE: Cash and bank accounts; money market funds; certificates of deposit; retirement plans; profit-sharing plans; 401(k), 457(b) or other deferred compensation plans; Keogh plans; 529 college savings plans or the Massachusetts U Plan; insurance policies; tangible personal property held and used for non-commercial purposes, such as antiques or artwork; interest in real property located in Massachusetts reported in Questions 22 and 23; and financial investments held by you and/or an **IMMEDIATE FAMILY** member as a trustee, nominee or agent for another **PERSON**, unless you hold that investment for yourself and/or an **IMMEDIATE FAMILY** member.

General Information for Questions 14 through 21

These questions are concerned with **TRUSTS**. **TRUSTS** generally fall into two (2) broad classifications: (1) **BUSINESS TRUSTS** created for the purpose of conducting a business (including **CHARITABLE** and **REALTY TRUSTS**); and (2) **FAMILY TRUSTS**. See definitions on pages 24-28 or under General Help at <http://www.eth.state.ma.us>.

For filing purposes, we have listed three (3) categories of **TRUSTS**: **BUSINESS**; **REALTY**; and **FAMILY**. You are required to disclose more information about **BUSINESS** and **REALTY TRUSTS** than about **FAMILY TRUSTS**.

All information should reflect the status of the **TRUST(S)** and your relationship, or that of an **IMMEDIATE FAMILY** member, to the **TRUST(S)**, as of December 31, 2014.

INCOME and assessed value of properties should be reported only by a category of value (see page 24).

Report only those **TRUSTS** that have a fair market value in excess of \$1,000 as of December 31, 2014.

INCOME from the **TRUST(S)** should be reported only if you, the filer, earned the **INCOME**. Do not report **INCOME** earned from the **TRUST(S)** by an **IMMEDIATE FAMILY** member.

If applicable, do NOT include the following information regarding any **TRUST(S)** in Questions 14 through 21:

- The name of the grantor, trustee or beneficiary of a **TRUST** if it is *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”
- The name of a **TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of a **TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 14

Question 14 requires the disclosure of information regarding a **BUSINESS** or **CHARITABLE TRUST**, its grantors, beneficiaries, ownership interests and **INCOME**. **INCOME** should be reported only by a category of value (see page 24). See the definitions of **BUSINESS TRUST** and **CHARITABLE TRUST** on page 24 or under General Help at <http://www.eth.state.ma.us>.

If you and/or an **IMMEDIATE FAMILY** member had a beneficial interest in, or served as a trustee of, a **BUSINESS** or **CHARITABLE TRUST** as of December 31, 2014, you must answer this question.

If you and/or an **IMMEDIATE FAMILY** member had no beneficial interest in, or did not serve as a trustee of, a **BUSINESS** or **CHARITABLE TRUST** as of December 31, 2014, check the “Not Applicable” box in this question and in Question 15.

If applicable, do NOT include the following information in your answer:

- The name of the grantor, trustee or beneficiary of a **BUSINESS** or **CHARITABLE TRUST** if it is *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”
- The name of a **BUSINESS** or **CHARITABLE TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of a **BUSINESS** or **CHARITABLE TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **BUSINESS** or **CHARITABLE TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 15

If you and/or an **IMMEDIATE FAMILY** member beneficially own assets held in a **BUSINESS** or **CHARITABLE TRUST**, you must answer this question. Report all **SECURITIES** and other **INVESTMENTS** with a fair market value in excess of \$1,000, as of December 31, 2014, held in the **TRUST(S)** and beneficially owned by you and/or an **IMMEDIATE FAMILY** member. Identify the assets of the **TRUST**. For example, give the name of each stock, bond, or other **SECURITY** you owned with a value in excess of \$1,000 as of December 31, 2014. If the asset is real estate, provide the complete address of the property.

Do NOT report values or **AMOUNTS**, only the type of asset you own.

A transfer of property into or out of the **BUSINESS** or **CHARITABLE TRUST** at any time during 2014 must be reported in Question 20 or 21.

If applicable, do NOT include the following information in your answer:

- The name of a **BUSINESS** or **CHARITABLE TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of real estate held in a **BUSINESS** or **CHARITABLE TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **BUSINESS** or **CHARITABLE TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 16

Question 16 requires the disclosure of information regarding a **FAMILY TRUST**, its assets and beneficiaries. See the definition of **FAMILY TRUST** on page 26 or under General Help at <http://www.eth.state.ma.us>.

You need to report assets held in the **FAMILY TRUST** only if you and/or an **IMMEDIATE FAMILY** member had a right to those assets as of December 31, 2014. For example, if your parents have, by will, made you a beneficiary of a **FAMILY TRUST**, you would not have to report anything because you have no right to receive anything while they are still living.

If the **FAMILY TRUST** was not created by you and/or an **IMMEDIATE FAMILY** member, you are only required to report the information in Question 16 to the extent that you are able to do so after making a reasonably diligent inquiry.

Report all **SECURITIES** and other **INVESTMENTS** with a fair market value in excess of \$1,000 as of December 31, 2014, held in the **TRUST(S)** and beneficially owned by you and/or an **IMMEDIATE FAMILY** member. If the **INVESTMENT** is real property, provide the complete address of the property.

A transfer of property into or out of the **FAMILY TRUST** at any time during 2014 must be reported in Question 20 or 21.

If applicable, do NOT include the following information in your answer:

- The name of any **IMMEDIATE FAMILY** member. Instead, put, e.g., “Spouse” or “Child(ren).”
- The address of real estate held in a **FAMILY TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **FAMILY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

General Information for Questions 17 through 19

Questions 17 through 19 are concerned with real property held in a **REALTY TRUST**. A **REALTY TRUST** is a **BUSINESS** within the meaning of the Financial Disclosure Law. Each question focuses on a specific aspect of your interest or the interest of an **IMMEDIATE FAMILY** member in a **REALTY TRUST**. The directions for each question describe what information must be disclosed.

Instructions for Question 17

If you and/or an **IMMEDIATE FAMILY** member had a beneficial ownership interest in, or served as a trustee of, a **REALTY TRUST** as of December 31, 2014, you must answer this question. See the definition of **REALTY TRUST** on page 27 or under General Help at <http://www.eth.state.ma.us>.

If applicable, do NOT include the following information in your answer:

- The name of the grantor, trustee or beneficiary of a **REALTY TRUST** if it is *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”
- The name of a **REALTY TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”

If any **REALTY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 18

Answer this question only if, as of December 31, 2014, you had a beneficial interest in assets held in the **REALTY TRUST(S)** reported in Question 17. Only report properties held in the **TRUST** as of December 31, 2014.

If any property reported in this question is held by a **BUSINESS** for rental purposes, you need to disclose the net **INCOME** as reported on tax returns.

INCOME and assessed value of properties should be reported only by a category of value (see page 24).

A transfer of property into or out of the **REALTY TRUST** at any time during 2014 must be reported in Question 20 or 21.

If applicable, do NOT include the following information in your answer:

- The name of a **REALTY TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of any property held in a **REALTY TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”
- The record owner’s name on the deed of any property held in a **REALTY TRUST** if it is the name of *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”

If any **REALTY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 19

Disclose all mortgage(s), if any, on each property held by a **BUSINESS, CHARITABLE** or **REALTY TRUST**, including home equity and reverse mortgage loans, in excess of \$1,000, which were outstanding on December 31, 2014. For **BUSINESS** and rental properties, identify by category the **AMOUNT** owed as of December 31, 2014, and the original **AMOUNT** of the mortgage (see page 24). For your current home, you must report the loan, but should exclude the **AMOUNT** borrowed and owed. If the mortgage is held only by an **IMMEDIATE FAMILY** member, do NOT report the **AMOUNTS** borrowed and owed.

If applicable, do NOT include the following information in your answer:

- The name of a **BUSINESS, CHARITABLE** or **REALTY TRUST** if it incorporates your current home address or the name or current home address of *any* family member. Instead, put, e.g., “Home Address Trust,” “Spouse’s Name Trust,” “Child(ren)’s Name Trust,” “Other Family Member’s Name Trust” or “Other Family Member Home Address Trust.”
- The address of property held in a **BUSINESS, CHARITABLE** or **REALTY TRUST** if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

- The name of the creditor if it is *any* family member. Instead, put, e.g., “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”
- The address of the creditor if it is the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **BUSINESS, CHARITABLE** or **REALTY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 20

Disclose all purchases and/or transfers of property located only in Massachusetts, which occurred at any time in 2014, to any **BUSINESS, CHARITABLE, FAMILY** or **REALTY TRUST** listed in your answers to Questions 14, 16 and 17.

If applicable, do NOT include the following information in your answer:

- The address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”
- The name of the seller or transferor if it is *any* family member. Instead, put, e.g., “Spouse,” “Child(ren)” or “Other Family Member.”
- The address of the seller or transferor if it is the same as your current home address or the current home address of *any* family member. Instead, put “Home Address” or “Other Family Member Home Address.”

If any **BUSINESS, CHARITABLE, FAMILY** or **REALTY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 21

Disclose all sales and/or transfers of property located only in Massachusetts, which occurred at any time in 2014, made by any **BUSINESS, CHARITABLE, FAMILY** or **REALTY TRUST** listed in your answers to Questions 14, 16 and 17.

If applicable, do NOT include the following information in your answer:

- The address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”
- The name of the purchaser or transferee if it is *any* family member. Instead, put, e.g., “Spouse,” “Child(ren)” or “Other Family Member.”
- The address of the purchaser or transferee if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

If any **BUSINESS, CHARITABLE, FAMILY** or **REALTY TRUST** is a blind trust, which is a type of **TRUST** that involves giving management of the investments in the **TRUST** to another person over whom the beneficiary has no control, you should call Lauren Duca, the Commission’s Deputy Chief/SFI, Legal Division, at (617) 371-9503 for advice on how to make the required disclosures.

Instructions for Question 22

Identify any real property located in the Commonwealth of Massachusetts, with an assessed value in excess of \$1,000, in which you and/or an **IMMEDIATE FAMILY** member held a direct or indirect interest (as an individual, joint tenant, tenant in common, tenant by the entirety, proprietor, partner or beneficiary of an estate) as of December 31, 2014. Such interest(s) include, but are not limited to, fee simple ownership, rights under an option or purchase agreement, rights as a co-owner in a condominium or cooperative, or rights under a lease with a term of more than seven years. Real property owned by a corporation is considered owned by any **PERSON** who owns 10% or more its stock. **BUSINESS** property or property used for **BUSINESS** purposes and held in a **BUSINESS TRUST** or **REALTY TRUST** is to be reported in Questions 14–15 or 17–18. Assessed value of properties should be reported only by a category of value (see page 24).

If applicable, do NOT include the following information in your answer:

- The address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”
- The name of any **IMMEDIATE FAMILY** member. Instead, put, e.g., “Filer and Child(ren),” “Spouse,” “Spouse and Child(ren)” or “Children.”

Instructions for Question 23

Identify any real property held for business, investment or rental purposes, including time-sharing arrangements (regardless of location), with an assessed value in excess of \$1,000, in which you and/or an **IMMEDIATE FAMILY** member had a direct or indirect interest as of December 31, 2014.

If any of the property reported in Question 23 is owned by a **BUSINESS** entity organized for profit, other than a **REALTY TRUST** reported in Question 18, disclose any net **INCOME** as reported on tax returns.

INCOME and assessed value of properties should be reported only by a category of value (see page 24).

EXCLUDE: Properties held primarily for personal or family use. If applicable, do NOT include the address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.” You should also NOT include the name of *any* **IMMEDIATE FAMILY** member. Instead, put, e.g., “Filer and Child(ren),” “Spouse,” “Spouse and Child(ren)” or “Children.”

Instructions for Question 24

Identify any real property located in Massachusetts which was purchased by or otherwise transferred to you and/or an **IMMEDIATE FAMILY** member at any time during 2014. If applicable, do NOT include the address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.” You should also NOT include the name of *any* family member. Instead, put, e.g., “Filer and Child(ren),” “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”

Purchases of property held in a **BUSINESS, CHARITABLE, REALTY** or **FAMILY TRUST** should be reported in Question 20.

Instructions for Question 25

Identify any real property located in Massachusetts which was sold by or otherwise transferred from you and/or an **IMMEDIATE FAMILY** member at any time during 2014. If applicable, do NOT include the address of the property if it is the same as your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.” You should also NOT include the name of *any* family member. Instead, put, e.g., “Filer and Child(ren),” “Spouse,” “Spouse and Child(ren),” “Child(ren)” or “Other Family Member.”

Sales of property held in a **BUSINESS, CHARITABLE, REALTY** or **FAMILY TRUST** should be reported in Question 21.

Instructions for Question 26

Identify all mortgages, including home equity and reverse mortgage loans, in excess of \$1,000, which were outstanding on December 31, 2014, for which you and/or an **IMMEDIATE FAMILY** member were obligated. Amounts borrowed and owed should be reported only by a category of value (see page 24). For your current home, you must report the loan, but you should exclude the **AMOUNTS** borrowed and owed. For an **IMMEDIATE FAMILY** member, do not report the **AMOUNTS** borrowed and owed.

If applicable, do NOT include the address of your current home or the current home of *any* family member in your answer. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.” You should also NOT include the name of *any* family member. Instead, put, e.g., “Spouse,” “Child(ren)” or “Other Family Member.”

Instructions for Question 27

Identify any real property located in Massachusetts on which you and/or an **IMMEDIATE FAMILY** member held a mortgage as of December 31, 2014. Also identify any real property located out-of-state which was held for business or rental purposes on which you and/or an **IMMEDIATE FAMILY** member held a mortgage as of December 31, 2014. Report the name and address of the mortgagee, that is, the **PERSON** obligated to you and/or an **IMMEDIATE FAMILY** member under the mortgage, and the assessed value by category (see page 24). If the mortgage is held only by an **IMMEDIATE FAMILY** member, do not report the assessed value of the property.

EXCLUDE: Mortgages on out-of-state property if the property is held primarily for personal or family use. If applicable, do NOT include the name of *any* family member in your answer.

Instead, put, e.g., “Spouse,” “Child(ren)” or “Other Family Member.” You should also NOT include the address of the property if it is your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

Instructions for Question 28

Identify each debt, loan, or other liability, including mortgage(s), home equity and reverse mortgage loans on property located out-of-state, in excess of \$1,000, owed by you and/or an **IMMEDIATE FAMILY** member as of December 31, 2014. Use categories of value for **AMOUNT** (see page 24) where applicable. For each debt, loan or liability, you must also identify the loan collateral, which is the property assigned to guarantee payment. If applicable, do NOT include the name of *any* family member in your answer. Instead, put, e.g., “Spouse,” “Child(ren)” or “Other Family Member.” You should also NOT include your current home address or the current home address of *any* family member. Instead, put, e.g., “Home Address” or “Other Family Member Home Address.”

Debts of a partnership, trust, or estate are debts of its partners or beneficiaries in proportion to their partnership, beneficial or other interests. Debts of a corporation are debts of a **PERSON** who owns 10% or more of the corporation’s stock. The amount of the corporate debt attributable to such **PERSON** is in the same proportion as the percentage of stock owned by the **PERSON** in the corporation is to the total outstanding debt of the corporation. For example: You own 20% of the stock in a corporation. The corporation has outstanding debt of \$20,000. You are considered to have a debt of \$4,000 (i.e., 20% of \$20,000) of the outstanding debt of the corporation. Loans or debts of a **BUSINESS** incurred to finance an item or service used by a stockholder, director, officer, partner or employee of a **BUSINESS** primarily for his personal or private use, or any **BUSINESS** loan which is personally guaranteed by such individuals, generally would not be deemed to have been incurred in the ordinary course of business and, therefore, should be reported. If you are a cosigner or a guarantor of a loan, you must report that information.

EXCLUDE: Any liability of \$1,000 or less; installment loans (cars, household effects, etc.); educational loans; medical and dental debts; credit card purchases (other than cash advances); support or alimony obligations; debts incurred in the ordinary course of business, such as loans or debts used to finance the day-to-day operations of a **BUSINESS** (e.g., the purchase of goods, services, or raw materials from a vendor) and loans to purchase equipment or other assets used to operate a **BUSINESS**; debt you owe to a spouse, a **CLOSE RELATIVE** or the spouse of a **CLOSE RELATIVE**.

Instructions for Question 29

Identify each creditor, by name and address, who at any time during 2014 forgave indebtedness in excess of \$1,000 owed by you and/or an **IMMEDIATE FAMILY** member. Use categories of value for **AMOUNT** (see page 24), where applicable. When only part of a debt was forgiven, report only the **AMOUNT** forgiven. You must report debts forgiven in excess of \$1,000 even if that debt was not required to be reported in Question 28.

EXCLUDE: Any indebtedness of less than \$1,000 that was forgiven; debts forgiven by a spouse, a **CLOSE RELATIVE**, or the spouse of a **CLOSE RELATIVE**.

Instructions for Question 30

When you sign and date your SFI, you are declaring, under the pains and penalties of perjury, that you have made a diligent effort to obtain the required information regarding yourself and your **IMMEDIATE FAMILY** members and that the information provided in the SFI and any attachments is true and complete to the best of your knowledge.

DEFINITIONS

AMOUNT: A category of value, rather than an exact dollar figure, as follows:

\$ 1,000 or less
\$ 1,001 to 5,000
\$ 5,001 to 10,000
\$ 10,001 to 20,000
\$ 20,001 to 40,000
\$ 40,001 to 60,000
\$ 60,001 to 100,000
\$100,001 or more

BUSINESS: Any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint stock company, receivership, business or real estate trust or any other legal entity organized for profit or charitable purposes.

BUSINESS TRUST: A business or Massachusetts trust is generally created pursuant to G.L. Chapter 182 or a similar statute, for the purpose of conducting a business. It is similar to a corporation in that its ownership interest is generally divided into transferable shares or certificates which are held by the beneficiaries. These beneficiaries are similar to a corporation's shareholders. *See also* **TRUST**.

BUSINESS WITH WHICH HE IS ASSOCIATED: Any business in which the reporting person or a member of his **IMMEDIATE FAMILY** is a general partner, proprietor, officer or other employee, including one who is self-employed or serves as a director, trustee or in any similar managerial capacity and any business more than 1 percent of any class of the outstanding equity of which is beneficially owned in the aggregate by the reporting person and members of his **IMMEDIATE FAMILY**.

CANDIDATE FOR PUBLIC OFFICE: Any individual who seeks nomination or election to public office, as defined below. An individual shall be deemed to be seeking nomination or election to public office if he has: (1) received a political contribution or made an expenditure, or has given his consent for any other person or committee to receive a political contribution or make an expenditure, for the purpose of influencing his nomination or election to such office, whether or not the specific public office for which he will seek nomination or election is known at the time the political contribution is received or the expenditure is made; or (2) taken the action necessary under the laws of the Commonwealth of Massachusetts to qualify himself for nomination or election to such office.

CHARITABLE TRUST: A type of business trust, generally a not-for-profit entity organized for charitable purposes, such as supporting certain educational, scientific or religious goals. The provisions of a **CHARITABLE TRUST** are usually enforceable by the Attorney General and such trusts are sometimes tax-exempt pursuant to IRC § 501(c)(3). *See also* **TRUST**.

CLOSE RELATIVE: A person whose relationship to either you or your spouse is that of a parent, grandparent, great grandparent, child, grandchild, great grandchild, aunt, uncle, sister, brother, niece or nephew, or the spouse of any such relative.

COMMISSION: The State Ethics Commission established by G. L. Chapter 268B, section 2.

DESIGNATED PUBLIC EMPLOYEE: A person who holds a **MAJOR POLICYMAKING POSITION** in a **GOVERNMENTAL BODY**. **DESIGNATED PUBLIC EMPLOYEE** does not include any person who holds a position for which no compensation is authorized other than reimbursements for expenses, and any person serving on a governmental body that has no authority to expend public funds other than to approve reimbursements for expenses.

DIRECT INTEREST IN A MATTER BEFORE A GOVERNMENTAL BODY: A person has such an interest if, at any time during 2014:

- (1) the use or value of his property or the conduct of his business; or
- (2) the use or value of the property, or the conduct of the business, of a person with which he is affiliated as an employee, officer, director, trustee, general partner, proprietor or in a similar managerial capacity;

could be or was affected by a matter before a governmental body, unless the effect is not substantially greater than the effect generally on persons residing in Massachusetts. Any business which is regulated by a governmental body has such an interest.

DIRECT INTEREST IN LEGISLATION or LEGISLATIVE ACTION: A person has such an interest if, at any time during 2014:

- (1) the use or value of his property or the conduct of his business; or
- (2) the value of the property, or the conduct of the business, of a person with which he is affiliated as an employee, officer, director, trustee, general partner, proprietor or in a similar managerial capacity;

could be or was affected by that legislation or legislative action, unless the effect is not substantially greater than the effect generally on persons residing in Massachusetts. Any business which is regulated by a governmental body has such an interest.

EQUITY: Any stock, or similar ownership interest in a business.

EXECUTIVE AGENT: An executive agent as defined in G.L. Chapter 3, section 39.

FAIR MARKET VALUE: The value that a willing buyer would pay, and a willing seller would accept, for property in an arm's length transaction.

FAMILY TRUST: A **FAMILY TRUST** is generally created by a family member on behalf of one or more family members. Depending on the nature of the trust, the beneficiary may have either a "present interest" (a right to trust assets now) or a "future interest" (e.g., an interest that will not occur until after someone's death). A "future interest" may be further classified as either "vested" or "contingent," meaning that the interest may or may not occur at some future point.

Generally, if you had the right to receive any of the assets of the trust as of December 31, 2014, you had a present interest in those assets. Accordingly, you must report ownership of those assets if valued at more than \$1,000. If you did not have the right to receive any of the assets of the **FAMILY TRUST** as of December 31, 2014, you did not have a present interest in those assets. Accordingly, you should not report anything about those assets. *See also* **TRUST**.

GIFT: A payment, entertainment, subscription, advance, services or anything of value, unless consideration of equal or greater value is received. **GIFT** shall not include: A political contribution reported as required by law; a commercially reasonable loan made in the ordinary course of business; anything of value received by inheritance; or a **GIFT** received from a member of the reporting person's immediate family or from a relative within the third degree of consanguinity of the reporting person or of the reporting person's spouse or from the spouse of any such relative.

GOVERNMENTAL BODY: A state or county agency, authority, board, bureau, commission, council, department, division or other entity, including the general court and the courts of the Commonwealth of Massachusetts.

GOVERNMENTAL SERVICE: Service as either a **DESIGNATED PUBLIC EMPLOYEE** or a **PUBLIC OFFICIAL**.

HONORARIUM: Payment of money or anything of value as consideration for an appearance, speech, the writing of an article or other similar activity.

IMMEDIATE FAMILY: A spouse and any dependent children residing in the reporting person's household.

INCOME: Income from whatever source derived, whether in the form of a fee, salary, allowance, forbearance, forgiveness, interest, dividend, royalty, rent, capital gain or any other form of recompense or any combination thereof. **INCOME** shall not include: Interest from savings accounts or from government obligations other than those of the Commonwealth of Massachusetts or any political subdivision thereof or any public agency or authority created by the general court; alimony and support payments; proceeds from a life insurance policy; retirement or disability benefits; or social security payments.

INVESTMENT: Any tangible or intangible property, whether personal property or realty, held primarily for the purpose of attaining an economic advantage, whether directly (as in the case of income or appreciation) or indirectly (as in the case of tax shelters). **INVESTMENT** shall not include: Cash and bank accounts; money market funds; certificates of deposit; retirement plans; profit-sharing plans; 401(k) or other deferred compensation plans; Keogh plans; insurance policies; tangible personal property held and used for non-commercial purposes, such as antiques or artwork; property held chiefly for personal or family use; or investments held by you and/or your immediate family member as a trustee, nominee or agent for another person, unless held for you and/or an immediate family member.

LEGISLATIVE AGENT: A legislative agent as defined in G.L. Chapter 3, section 39.

MAJOR POLICYMAKING POSITION: The executive or administrative head of a governmental body, all members of the judiciary, any person whose salary equals or exceeds that of a state employee classified in step 1 of Job Group XXV of the general salary schedule contained in G.L. Chapter 30, section 46, and who reports directly to said executive or

administrative head, the head of each division, bureau or other major administrative unit within such governmental body, and persons exercising similar authority.

PERSON: A **BUSINESS**, individual, corporation, union, association, firm, partnership, committee or other organization or group of persons.

POLITICAL CONTRIBUTION: A contribution of money or anything of value to an individual, candidate, political committee or person acting on behalf of an individual, candidate or political committee, for the purpose of influencing the nomination or election of said individual or candidate, or for the purpose of promoting or opposing a charter change, referendum question, constitutional amendment or other question submitted to the voters, and shall include any: (1) gift, subscription, loan, advance, deposit of money, or thing of value, except a loan of money to a candidate by a national or state bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business; (2) transfer of money or anything of value between political committees; (3) payment, by any person other than a candidate or political committee, or compensation for the personal services of another person which are rendered to such candidate or committee; (4) purchase from an individual, candidate or political committee, or person acting on behalf of an individual, candidate or political committee, whether through the device of tickets, advertisements, or otherwise, for fund-raising activities, including testimonials, held on behalf of said individual, candidate or political committee, to the extent that the purchase price exceeds the actual cost of the goods sold or services rendered; (5) discount or rebate not available to other candidates for the same office and to the general public; and (6) forgiveness of indebtedness or payment of indebtedness by another person. **POLITICAL CONTRIBUTION** shall not include: The rendering of services by speakers, editors, writers, poll watchers, poll checkers or others; the payment by those rendering such services of such personal expenses as may be incidental thereto; or the exercise of ordinary hospitality.

PUBLIC OFFICE: A position for which one is nominated at a state primary or chosen at a state election, excluding the positions of Senator and Representative in Congress and the office of regional district school committee member elected district-wide.

PUBLIC OFFICIAL: A person who holds a public office, whether by election or appointment.

REALTY TRUST: A type of business trust generally created for the purpose of buying, selling, holding or investing in real property. These trusts may also be Real Estate Investment Trusts or "REITs." *See also* **TRUST**.

REIMBURSEMENT: Payment for money expended or to be expended (e.g., travel, meals or lodging). A **REIMBURSEMENT** must be for actual expenses incurred or to be incurred.

REPORTING PERSON: A person required to file a Statement of Financial Interests pursuant to G. L. Chapter 268B, section 5.

SECURITY: Any note, stock, bond, debenture, other evidence of a debt owed to you and/or an immediate family member, including, but not limited to, certificates of interest or participation in any profit-sharing arrangement, certificates of interest in any mutual fund, stock or commodity option, or similar evidence of ownership or interest, or receipts or certificates of deposit for any of the foregoing, or warrants or rights to subscribe to or purchase any of the foregoing.

TAX SHELTER: Any device used by a taxpayer to reduce or to defer payment of taxes. Tax shelters are organized either as a business or as an investment and should be reported as such. Retirement plans are not considered **TAX SHELTERS** and should not be reported.

TRUST: A legal entity in which the actual or beneficial ownership of property is separated from its legal ownership. The legal ownership is held by a trustee who owes certain duties to the beneficiaries.