

School Information and Cover Page

School Name: The Ethical Community Charter School of New York

School Leader: Annette Keane

Primary address: 700 Park Ave., Brooklyn, NY 11206

School website: www.teccs-ny.org

School email: akeane@teccs-ny.org

Telephone: (718) 599-2176 Fax: (718) 599-2814

BEDS # 331400860930

District/CSD of Location: NYC District #14

Charter authorizer: NYCDOE Chancellor

Chair, Board of Trustees: Jeffrey Meyer

Date school first opened for instruction: August 31, 2009

2011-2012 Enrollment: 201

2011-2012 Grades Served: K-3

Our signatures below attest that all of the information contained herein is truthful and accurate.

Annette Keane  
Print Name, Head of Charter School

Annette Keane 7/10/12  
Signature and Date

Jeffrey Meyer  
Print Name, President, Board of Trustees

Jeffrey Meyer 7/6/12  
Signature and Date

# The Ethical Community Charter School of New York

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## II. New York State School Report Card

The New York State Report Card (2010-2011) for The Ethical Community Charter School can be found at the following link:

<https://reportcards.nysed.gov/files/2010-11/AOR-2011-331400860930.pdf>

## III. Key Focus Area Requests

### 1. Progress Toward Goal Achievement

- a. This section will be submitted by November 1, 2012 as determined by the authorizer.

### 2. Financial Information

- a. Total Expenditures and Administrative Expenditures Per Child

<b>School Expenditures Per Child</b>	
Total Expenditures per Child	<b>\$13,022.08</b>
Administrative Expenditures per Child	<b>\$ 2,739.58</b>

- b. FY2013 Budget is attached as Appendix E

### 3. Charter Revisions

- a. There were no charter amendments requested in the 2011-12 school year. For 2012-13 and beyond, all changes to the charter agreement will be outlined in the renewal application submitted August 31, 2012.

### 4. Board of Trustee Financial Disclosure Statements

- a. Attached in Appendix F

### 5. Enrollment and Retention Targets

- a. TECCS continues to enact corrective measures in order to be in full compliance with the 2010 amended Charter School Act, specifically meeting target rates for enrollment and retention for ELL students and special education students. This goal is reflected in the school's marketing plan in the following ways:

## The Ethical Community Charter School of New York

- Visiting and meeting families at Head start programs
- Recruiting families that are part of a Community Based Organization that provides support services
- Printing TECCS flyers in Spanish
- Placing an ad in Chinese newspapers and
- Placing our school in the directory with the NY METRO Special Parent magazine.
- ELL teacher and staff are available at parent teacher conferences to assist in language translation as needed

Going forward in 2012-13, the school plans to utilize the following measures:

- All school brochures, mailings and application will mention that the school accommodates students with disabilities, English language learners and participates in the free and reduced lunch program.
- A language translator dropdown will be added to the school website and open house schedule will be posted.
- Distribute our flyers door to door in the 3 Public Houses area surrounding our school.
- Our flyers and applications will be dropped off at local Head Start Programs along with other local community organizations in more than one language based on input regarding spoken languages of the families from program administrators.

**TECCS  
Budget  
FY 06/30/13**

**FY 2013  
Budget**

**Receipts**

**4000 Non-government contributions**

4005 Individual contributions	10,000
4010 Foundation contributions	35,000

**4100 In-kind contributions**

4105 Donated professional services	
4110 Donated other services	
4115 Donated use of facilities	267,624
4120 Gifts in kind - goods	

**4500 Government Grants**

4510 Per pupil funding (School District Funds)	3,333,000
4515 Federal funding (Title)	86,000
4505 CSP Funding	
4517 IDEA Funding	15,000
4520 Famis Funding	19,075

**5100 Earned Revenues**

5120 Student fees	2,000
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**5300 Other Incomes**

5810 Other Incomes erate	-
5305 Int.-savings/short-term invest	2,500
5490 Misc revenue	
5810 Special events - revenue	
5850 Satisfaction of Restrictions	

<b>TOTAL REVENUES</b>	<b>3,770,199</b>
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**Expenses**

<b><u>7100-7200</u></b>	<b>Salaries</b>	<b>2,272,989</b>
	<b><u>7210</u> Substitute Teachers</b>	<b>30,000</b>
	Fringe Benefits	
	7305 FICA	175,000
	7310 Unemployment	25,000
	7320 Health Insurance	175,000
	7320 HRA	27,000

The Ethical Community Charter School  
Appendix E:

7325 Dental insurance	19,000
7330 Life insurance	2,000
7335 Disability Insurance	7,000
7340 Workers Comp Insurance	17,464
7345 Pension plan contributions	45,000
7350 NY MCTMT TD MSC Tax	7,500
7355 Accidental D & D	500
<b>Total Fringe Benefits</b>	<b>500,464</b>

<b>Total salaries &amp; related benefits</b>	<b>2,803,453</b>
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**FY 2013  
Budget**

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**7400 Professional Costs**

7405 Accounting	10,000
7410 Legal	3,000
7415 Audit Fees	13,500
7420 Consultants	26,500
7425 Payroll fees	6,000
7426 Pension Admin Fees	5,000
7430 After School Activities	31,652
7435 Temporary Help	5,000
7445 IT Services	25,000
7490 Donated professional services	
7495 Donated other services	
<b>Total Professional Costs</b>	<b>125,652</b>

**8100 Office Expenses**

8122 Teacher Recruitment	3,500
8105 Office Supplies	16,000
8110 Postage	2,000
8115 Insurance - Business Owners	2,486
8116 Insurance - ELL	1,697
8117 Insurance - General Liability	9,933
8118 Insurance - Commercial Umbrella	3,151
8119 Insurance - Directors and Officers (D & O)	3,921
8120 Student Recruitment	4,000
8123 Admin Recruitment	
8125 Travel	500
8130 Professional Dues	5,000
8135 Subscription	1,000

The Ethical Community Charter School  
Appendix E:

8140	Emergency Notification	800
8150	Relocation Cost	
8205	Building Use Permit	
8155	Storage	400
8145	Meals & Refreshments, other	5,000
	<b>Total Office Expense</b>	<b>59,388</b>

**8200 Rent & Utilities**

8210	Utilities	350
8215	Telephone	-
8216	Internet	3,000
8290	Donated facilities	267,624
	<b>Total Rent &amp; Utilities Expense</b>	<b>270,974</b>

**8300 Maintenance & Repair**

8305	Office Equipment Repair	8,000
8310	Misc Repairs	
8320	Janitorial Supplies	800
	<b>Total Maintenance &amp; Repair Expense</b>	<b>8,800</b>

**8400 Pupil Supplies**

8405	Educational Materials	58,000
8410	Intervention Materials	8,000
8415	Ins. Equipment	-
8420	Classroom Supplies	22,000
8425	Library Materials - FAMIS	18,500
8430	Printing and Copying	400
8435	Special Education Materials	2,000
8440	Sports Equipment	1,400
8445	Art Supplies	2,500
8447	Music Supplies	2,200
8450	Uniforms	
	<b>Total Pupil Supplies Expense</b>	<b>115,000</b>

**FY 2013  
Budget**

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8460	<b>Speech: Occupational &amp; Physical Therapy</b>	2,000
	<b>Instructional Services</b>	<b>2,000</b>

<b><u>8480 Supplement Pupil Trans.</u></b>	-
<b>Total Supplement Pupil Trans. Expense</b>	<b>-</b>

8485	<u>Field Trip</u>	7,200
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The Ethical Community Charter School  
Appendix E:

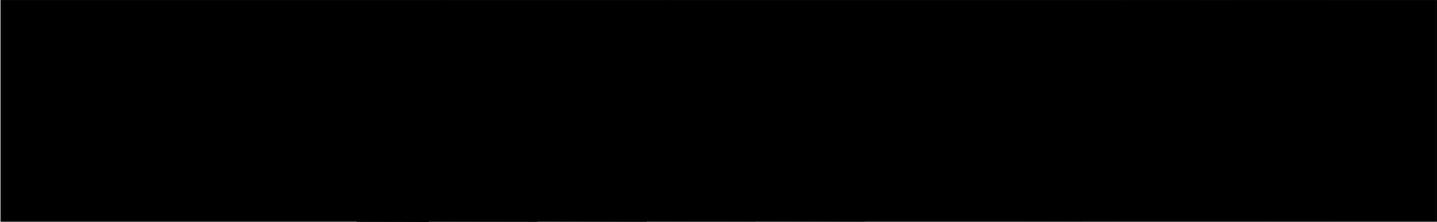
<b>Field Trip</b>	<b>7,200</b>
<b>8490 School Food</b>	8,000
8495 School Snacks	-
<b>Total Food Expense</b>	<b>8,000</b>
<b>8600 Contractual Services</b>	
8605 Conference travel and registration	3,000
8610 Staff Development	65,000
8615 Board Training	7,500
<b>Total Contractual Services Expense</b>	<b>75,500</b>
<b>8700 Other expenses</b>	
8705 Interest expense	250
8710 Misc Expense - Principal's Discretionary Fund	3,000
<b>Total Other Expenses</b>	<b>3,250</b>
<b>9500 Capital Equipment &amp; Furniture</b>	
9505 Office Equipment	5,000
9506 Classroom Equipment	5,000
9510 Office Furniture	6,000
9511 Student Furniture	21,000
9515 Computer Software	5,000
9520 Computer & Computer Equipment	35,000
9521 Computers and Workstations	35,000
9525 Leasehold improvements	5,000
<b>Total Capital Equipments &amp; Furniture</b>	<b>117,000</b>
<b>Total Other than Payroll expenses</b>	<b>792,764</b>
<b>Total Expenses</b>	<b>3,596,217</b>
<b>Excess rev. over Exp before depreciation</b>	<b>173,982</b>
Add: Capitalized Equipments and Furniture	117,000
Less Depreciation - Half Year	(11,700)
Depreciation on older items	(52,000)
<b>Excess of Revenue over Expenses</b>	<b>227,282</b>

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print) JEFFREY MEYER
2. Charter School Name THE ETHICAL COMMUNITY CHARTER SCHOOL
3. Charter Authorizer Entity \_\_\_\_\_



8. List all positions held on board (e.g., chair, treasurer, parent representative)

CHAIR

9. Is the trustee an employee of the school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

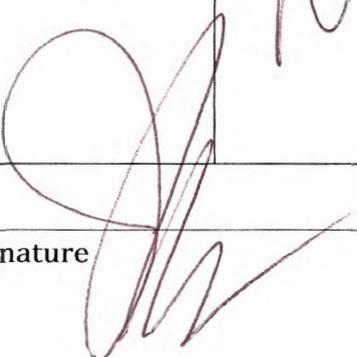
11. Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<p><i>PLEASE WRITE "None" if applicable. Do not leave this space blank.</i></p> <p><b>NONE</b></p>			

12. Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school **and** in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<p><i>PLEASE WRITE "None" if applicable. Do not leave this space blank.</i></p> <p><b>NONE</b></p>				

Signature



Date

7/6/2012

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print) Judith D. Wallach
2. Charter School Name The Ethical Community Charter School
3. Charter Authorizer Entity NYC DOE



8. List all positions held on board (e.g., chair, treasurer, parent representative)

Vice Chair

9. Is the trustee an employee of the school?  Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school?  Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

11. Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<i>None</i> please write "None" if applicable. Do not leave this space blank.			

12. Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school **and** in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<i>None</i> please write "None" if applicable. Do not leave this space blank.				

*Judith D. Wallace*  
Signature

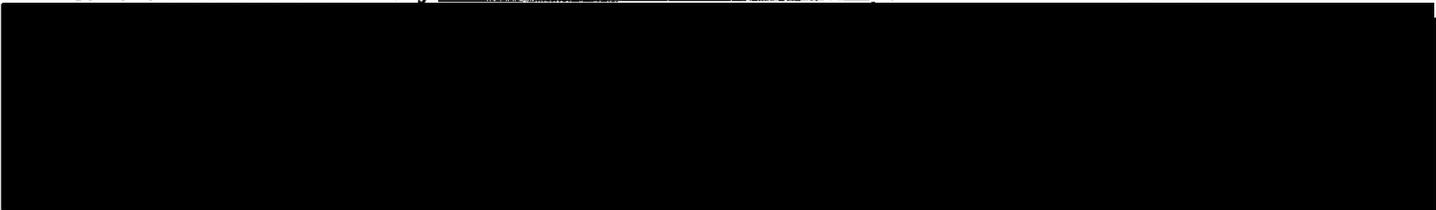
*July 21, 2012*  
Date

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. **Trustee Name (print):** Stephen Warner
2. **Charter School Name:** The Ethical Community Charter School
3. **Charter Authorizer Entity**



8. List all positions held on board (e.g., chair, treasurer, parent representative)

Chair, Education Committee

9. Is the trustee an employee of the school?  Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school?  Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.



**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print) Sianne L. LaBass
2. Charter School Name The Ethical Community Charter School (TECS)
3. Charter Authorizer Entity NYC DOE

8. List all positions held on board (e.g., chair, treasurer, parent representative)

- Trustee
- Treasurer

9. Is the trustee an employee of the school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

11. Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<p>Please write "None" if applicable. Do not leave this space blank.</p> <p style="text-align: center;"><u>None</u></p>			

12. Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school **and** in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<p>Please write "None" if applicable. Do not leave this space blank.</p> <p style="text-align: center;"><u>None</u></p>				

Sianna LaBarr  
Signature

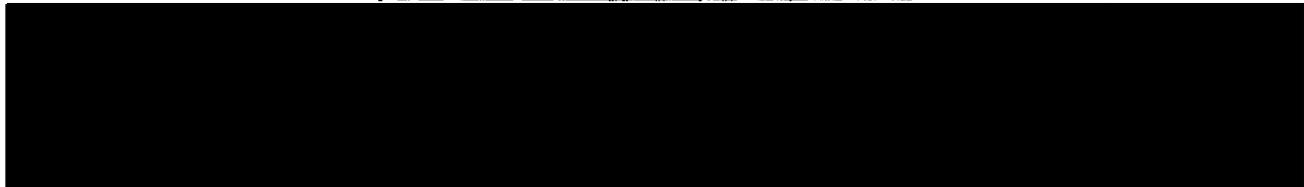
7/26/2012  
Date

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

- 1. Trustee Name (print): Gabrielle Lang
- 2. Charter School Name: The Ethical Community Charter School
- 3. Charter Authorizer Entity \_\_\_\_\_



8. List all positions held on board (e.g., chair, treasurer, parent representative)

Trustee  
\_\_\_\_\_

9. Is the trustee an employee of the school? \_\_\_ Yes X No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.  
\_\_\_\_\_

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school? \_\_\_ Yes X No

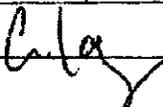
If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.  
\_\_\_\_\_

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Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<b>NONE</b>			

12. Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school and in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<b>NONE</b>				

Signature 

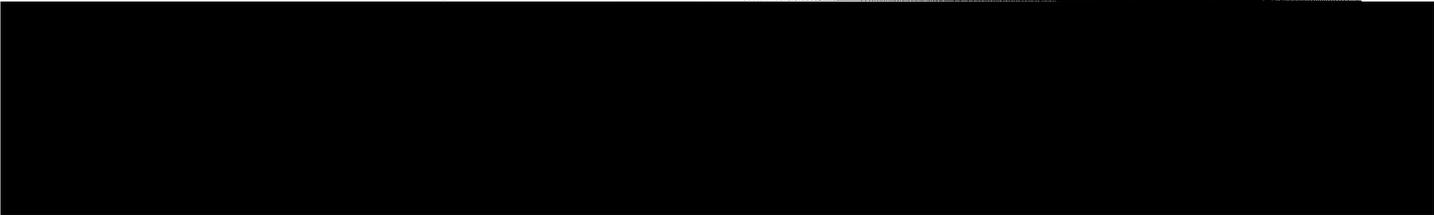
Date July 23, 2012

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print): Brian Holland
2. Charter School Name: The Ethical Community Charter School
3. Charter Authorizer Entity DOE



8. List all positions held on board (e.g., chair, treasurer, parent representative)  
Member of Nominating & Governance Comm. & Legal Taskforce

9. Is the trustee an employee of the school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

N/A

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school? \_\_\_ Yes  No

If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.

N/A

**11.** Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

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<i>Please write "None" if applicable. Do not leave this space blank.</i>			
None	→		

**12.** Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school **and** in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

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<i>Please write "None" if applicable. Do not leave this space blank.</i>				
None	→			

\_\_\_\_\_  
Signature

7.27.12  
\_\_\_\_\_  
Date

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print): Gordon Pelavin
2. Charter School Name: The Ethical Community Charter School
3. Charter Authorizer Entity NYC DOE



8. Parent Representative Trustee, Head of Facilities task force, member Education Committee

9. Is the trustee an employee of the school? \_\_\_Yes No

If **Yes**, please provide a description of the position you hold and your responsibilities, your salary and your start date.

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10. Is the trustee an employee or agent of the management company or institutional partner of the charter school? \_\_\_Yes No

If **Yes**, please provide a description of the position you hold and your responsibilities, your salary and your start date.

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11. Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<p><i>Please write "None" if applicable. Do not leave this space blank.</i></p> <p>NONE</p>			

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Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<p><i>Please write "None" if applicable. Do not leave this space blank.</i></p> <p>NONE</p>				

  
Signature

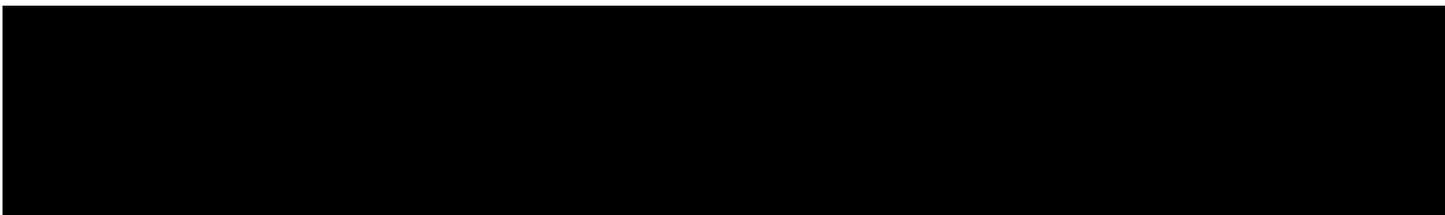
7/25/2012  
Date

**Disclosure of Financial Interest Form**

**Disclosure of Financial Interest by a New York Charter School Board of Trustees Member  
Annual Report 2011-12**

*\*Note: This Disclosure is a public record, but asterisked data fields will be redacted.*

1. Trustee Name (print): William N. Fitzpatrick, Jr.
2. Charter School Name: The Ethical Community Charter School
3. Charter Authorizer Entity \_\_\_\_\_



8. List all positions held on board (e.g., chair, treasurer, parent representative)  
Secretary \_\_\_\_\_

9. Is the trustee an employee of the school?  Yes  No  
If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.  
\_\_\_\_\_

10. Is the trustee an employee or agent of the management company or institutional partner of the charter school?  Yes  No  
If Yes, please provide a description of the position you hold and your responsibilities, your salary and your start date.  
\_\_\_\_\_

**11.** Identify each interest/transaction (and provide the requested information) that you or any of your immediate family members or any persons who live with you in your house have held or engaged in with the charter school during the time you have served on the board, and in the six-month period prior to such service. If there has been no such financial interest or transaction, write **None**. Please note that if you answered **Yes** to Question 2-4 above, you need not disclose again your employment status, salary, etc.

Date(s)	Nature of Financial Interest/Transaction	Steps taken to avoid a conflict of interest, (e.g., did not vote, did not participate in discussion)	Name of person holding interest or engaging in transaction and relationship to yourself
<p><b>NONE</b> <i>Please write "None" if applicable. Do not leave this space blank.</i></p>			

**12.** Identify each individual, business, corporation, union association, firm, partnership, committee proprietorship, franchise holding company, joint stock company, business or real estate trust, non-profit organization, or other organization or group of people doing business with the school **and** in which such entity, during the time of your tenure as a trustee, you and/or your immediate family member or person living in your house had a financial interest or other relationship. If you are a member, director, officer or employee of an organization formally partnered with the school that is doing business with the school through a management or services agreement, please identify only the name of the organization, your position in the organization as well as the relationship between such organization and the school. If there was no financial interest, write **None**.

Organization conducting business with the school	Nature of business conducted	Approximate value of the business conducted	Name of Trustee and/or immediate family member of household holding an interest in the organization conducting business with the school and the nature of the interest	Steps Taken to Avoid Conflict of Interest
<p><b>NONE</b> <i>Please write "None" if applicable. Do not leave this space blank.</i></p>				

Wm Fitzgerald  
Signature

7/31/12  
Date