GUIDE TO THE ANNUAL STATEMENT OF FINANCIAL DISCLOSURE

FOR NEW YORK STATE LEGISLATORS AND LEGISLATIVE STAFF

2025



New York State Legislative Ethics Commission

Alfred E. Smith Building, Suite 1431 Albany, New York

(518) 432-7837 Assembly ext. 5218 Senate ext. 2142

legethics.ny.gov

Table of Contents

<u>TOPIC</u>	<u>PAGE</u>
Introduction/Who Must File	1
When is the Statement Due	2
Where to File	2
General Information	3
Extensions of the Due Date	4
Deletion of Information	4
Questions 1-3 (Identification)	5-6
Question 4 (Positions Held)	6-7
Question 5 (Occupation)	7
Question 6 (State Contracts)	8
Question 7 (Political Party Positions)	8
Question 8(a) (Licensed Professions)	8-9
Question 8(b) (b-1) (b-2) (c) (Clients)	10
Question 8(d) (Business Investments)	10
Question 9 (Gifts)	10-11
Question 10 (Travel Reimbursements)	11
Question 11 (Trust, Retirement, Beneficial Interests)	11-12
Question 12(a) (Future Employers)	12
Question 12(b) (Prior Employers)	12
Question 13 (Income)	13
Question 14 (Deferred Income)	14
Question 15 (Assignment of Income)	14
Question 16 (Securities)	14-16
Question 16-a (Digital Assets)	16
Question 17 (Real Property)	16-17
Question 18 (Notes, Accounts Receivable)	17
Question 19 (Liabilities)	18
Review of the Statement and Penalties	18-19
Income Tables	20-23
Appendix A: Client Disclosure Requirements	24-25

Introduction

The Legislative Ethics Commission has prepared this guide to answer questions on how to complete and file the Annual Statement of Financial Disclosure ("statement") which is required by Public Officers Law § 73-a. This guide is for informational purposes only and does not have the force of law. It is not a substitute for a careful reading of Public Officers Law § 73, 73-a, 74, Legislative Law § 80, and Executive Law § 94.

If you have questions on how to complete your statement, you may contact the Legislative Ethics Commission (LEC) staff for information or write the LEC for formal advice on the application of the law.

Who Must File?

Pursuant to Public Officers Law § 73-a, the following individuals must file the Annual Statement of Financial Disclosure with the Legislative Ethics Commission and the Commission on Ethics and Lobbying in Government:

- Members of the legislature;
- Legislative employees who will receive annual compensation in 2025 of more than \$115,252 from the legislature;
- Legislative employees who hold policymaking positions, as determined by their individual appointing authority;
- Candidates for state legislative office (See separate guide for candidates).

*Please note: pursuant to statute, when the Annual Statement of Financial Disclosure is filed with the Legislative Ethics Commission, it is deemed filed with the Commission on Ethics and Lobbying in Government (COELIG) as well. The LEC will forward the disclosure forms to COELIG by the statutory deadline, in most cases, June 30th. You should not file an additional copy with COELIG.

If you work for more than one office or employer within the legislative branch of government and your total annual compensation for these jobs is more than \$115,252, you must file the statement. However, if you work for two different branches of government (e.g. legislative and executive) and receive \$115,252 annually or less from each branch of government you do **not** have to file the statement. This is true even if your total combined income is more than \$115,252. Regardless of income level, if you are designated as a policymaker, you must file the statement.

When Must the Annual Statement of Financial Disclosure be Filed?

The following individuals must file the annual statement on or before May 15, 2025 with the Legislative Ethics Commission:

- Members of the legislature;
- Legislative employees who are expected to receive more than \$115,252 in legislative income during the current calendar year (2025);
- Legislative employees who are designated as policymakers by their appointing authority and earn \$115,252 or less.

The following individuals must file the annual statement within thirty (30) days of the change in employment status:

- New legislative employees, hired after May 15, who are expected to receive more than \$115,252 in legislative income during the remainder of the calendar year 2025;
- New legislative employees, hired after May 15, who are designated as policymakers by their appointing authority;
- Continuing legislative employees who were not required to file by May 15 but subsequently receive a salary adjustment which will result in their receiving more than \$115,252 in legislative income during the current calendar year;
- Continuing legislative employees who were not required to file by May 15 but are subsequently designated as policymakers by their appointing authority.

Where to file?

You must file the Annual Statement of Financial Disclosure with the Legislative Ethics Commission:

By personal delivery or messenger:

Alfred E. Smith State Office Building 80 South Swan Street, Suite 1431 Albany, New York 12210

By mail:

Legislative Ethics Commission Legislative Office Building, Box 75 Albany, NY 12247

A confirmation card indicating the date that the statement was received will be sent or given to you.

General Information

All questions on the Annual Statement refer to financial interests held during **calendar year 2024**, unless otherwise indicated. Specifically, answer questions 1 through 3 **as of the filing date**. Answer questions 4 through 18 with respect to **calendar year 2024**. Finally, answer question 19 **as of the date you complete the statement**.

Please respond to every part of each question. On those sections in which you have no information to report, please indicate "none". If a question does not apply to you, indicate "not applicable" in the space provided. <u>DO NOT LEAVE ANY RESPONSES</u> BLANK.

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

If you are unable to complete a question due to lack of information, please contact the Legislative Ethics Commission for assistance.

Use the letter categories found in Tables I and II when reporting categories of value or amount. Actual dollar amounts are not required to be disclosed. If you have difficulty in ascertaining the proper value of a financial interest, you may wish to value it at the higher category since the law provides a penalty for falsely understating a value.

Additional pages may be attached to the statement if more space is needed. Each additional page should include:

- The question number;
- The remainder of the answer;
- The name of the reporting individual.

Please complete the statement legibly, either printing in ink or typing in the answers. Illegible or unsigned statements, or those completed in pencil, will be returned for proper completion.

A "fillable form" which may be completed, printed, and submitted with an original signature is available on the Legislative Ethics Commission website: legethics.nv.gov

Public Inspection of Annual Statements of Financial Disclosure

Legislators' statements beginning with calendar year 2012 are posted on a public website maintained by the Commission on Ethics and Lobbying in Government

("COELIG"). Legislative employee statements, while not posted online, are public information and available upon request at "COELIG."

Internal Revenue Service Automatic Extension of Time

If you have filed an individual request for extension of time for your income tax return with the Internal Revenue Service, you may request an extension of time from the Commission to file the complete Annual Statement of Financial Disclosure. If you wish to do this, you must file the following information with the Commission by the due date, which in most cases is May 15:

- An initial statement including all information not affected by the income tax extension; and
- A copy of your Internal Revenue Service request for extension.

A request for an extension under this provision does not excuse you from filing information not related to your income tax return by the due date.

You also must file a supplementary statement with all the remaining information no later than seven days after your tax extension expires.

Request for an Exemption or Deletion Pertaining to Spouse, Domestic Partner and/or Unemancipated Children

Requests for exemption from disclosing specific information pertaining to your spouse, domestic partner, and/or unemancipated children or requests to delete specific information from statements made available to the public may be filed with the Commission on Ethics and Lobbying in Government. Information on this process is available on the Legislative Ethics Commission website (legethics.ny.gov).

Exemption from Disclosing Client Information

You may request an exemption from disclosing certain information pertaining to your clients, including the identity of a client and work on an initial public offering, in response to Questions 8(b-1), 8(b-2), and 8(c) of the Statement. Please see Appendix A for additional information regarding the client disclosure exemption process.

Guidance on the Contents of the Statement

The following pages cover each question on the statement. The text summarizes the broad purpose of the question, identifies any unique interpretations given by the commission and restates parts of the question that you may have overlooked.

Remember that responses to questions should not be left blank. Please indicate "none" or "not applicable" to each question where you have nothing to report. Questions 1 through 2(d) must be answered.

QUESTIONS 1-3 - Name, Legislative Employment and Marital Status:

Question 1: State your full name at the time of filing.

<u>Question 2(a)</u>: Report the official title of your current legislative position.

<u>Question 2(b)</u>: Members should list the legislative house in which they serve. Employees should list the full name of the legislative office, as well as the legislative house, in which they are employed.

Question 2(c): Provide a complete office address.

<u>Ouestion 2(d)</u>: Provide the appropriate office telephone number.

Question 3(a): Report your current marital status **as of the filing date**. If you are married, report your spouse's full name. You are no longer required to report your spouse's "maiden name."

If you married on or after January 1, 2025, you must report spousal information under the appropriate questions, even though you were not married during 2024.

You are not required to report financial information of a spouse if you and your spouse live separate and apart with the intention of terminating the marriage or permanent separation; or if you are separated pursuant to a judicial order, decree, or judgment, or a legally binding agreement.

Question 3(b): Report the full name of your domestic partner, if applicable.

A domestic partner is defined as: "a person who, with respect to another person, is formally a party in a domestic partnership or similar relationship with the other person, entered into pursuant to the laws of the United States or any state, local or foreign jurisdiction, or registered as the domestic partner of the other person with any registry maintained by the employer of either party or any state, municipality, or foreign jurisdiction."

If you entered into a domestic partnership on or after January 1, 2025, you must report information pertaining to your domestic partner under the appropriate questions, even though you were not domestic partners during 2024.

Question 3(c): "Unemancipated child" means a son, daughter, stepson, or stepdaughter who is under age eighteen (18), unmarried and living in your household. If you do not have any unemancipated children, please state "none".

QUESTION 4 - Positions Held, Other Than Those With the State:

<u>Question 4(a)</u>: Report any positions of authority that **you** hold other than with the State of New York, including compensated and uncompensated positions.

<u>Question 4(b)</u>: Report any positions of authority that your spouse, domestic partner, or unemancipated children hold other than with the State of New York, including compensated and uncompensated positions.

If you have nothing to report, indicate "not applicable" on the appropriate part of this question.

For Questions 4(a) and (b), "Entity" refers to the column heading "organization." If the entity is a **partnership**, indicate whether you are a general or limited partner under Question (4a). Under Question (4b), report similar interests held by your spouse, domestic partner, or unemancipated children. If the entity is a **corporation**, whether for-profit or non-profit, you must report your position with the corporation under Question (4a), and that of your spouse, domestic partner, or unemancipated children under Question (4b).

"Position of any nature" means a position equivalent to an officer, director or partner in a corporation, association, organization or partnership, but having a different title. Report any membership, directorship, or officership with a limited liability company or a limited liability partnership on these questions.

You also must report any state or local agency that licenses or regulates the entity, as well as those agencies with which the entity did regular and significant business.

The term "regulatory agency" shall mean:

- Department of Financial Services;
- State Liquor Authority;
- Department of Agriculture and Markets;
- Department of Education;
- Department of Environmental Conservation;
- Department of Health;
- Division of Housing and Community Renewal;
- Department of State, other than the Division of Corporations and State Records;

- Department of Public Service;
- The Industrial Board of Appeals in the Department of Labor; and
- The Department of Law, other than when the Attorney General or her agents or employees are performing duties specified in section sixty-three of the Executive Law.

If you need further guidance on determining whether you should identify any state or local agency, you may contact the Legislative Ethics Commission for advice. If you do not know whether the organization was licensed or regulated by, or did business with, any state or local agency, indicate that you do not know.

You do not need to report memberships in organizations (except with limited liability companies), positions with political parties, uncompensated honorary positions, trustee for family members, or positions held with the State of New York. "Uncompensated honorary positions" are positions limited to a specific event (e.g., chair of a fund-raising drive) or strictly ceremonial in nature (e.g., a parliamentarian).

QUESTION 5 - Occupation:

Question 5(a): Report any occupation or employment you had during 2024. You need not duplicate information that you provided on your legislative position under question 2(a). List any trade, business, or profession you engaged in during 2024. "Engaged in" means practicing the occupation or profession during 2024. If this activity (trade, business, or profession) was licensed by, regulated by, or did regular and significant business with a state or local agency, you need to report the agency's name. The term "regulatory agency" has the same meaning as discussed **on page 6**.

Question 5(b): Report any occupation or employment held by your spouse domestic partner, or unemancipated children **only if** that person was (i) employed or engaged in an occupation, trade, business, or profession which is licensed or regulated by a state or local agency, or (ii) if that person's employer did regular and significant business with a state or local agency.

Please note that some of the information required to be reported on <u>Questions 5(a) and 5(b)</u> may be the same as information reported on Questions 4(a) and 4(b).

If you have nothing to report, indicate "not applicable" on the appropriate part of this question.

QUESTION 6 - Interests in Contracts:

<u>Question 6</u>: Report **all** interests in **continuing** contractual agreements with the state. It also requires you to report all continuing interests in **noncompetitively bid contracts with local agencies.**

The statute does not require you to report: competitively bid contracts with local agencies; completed contracts in which final payment was made by the calendar year end and with which there is no ongoing dispute; or contracts that are limited to holding a bond or note as an investment instrument from a state or local agency. Information regarding such bonds and notes may be required to be reported under <u>Question 13</u> or <u>Question 16</u>.

If you have nothing to report, indicate "not applicable".

QUESTION 7 - Political Party Positions:

Question 7: List any positions you held during 2024 with a political party or political organization, as defined in New York State Election Law.

You are not required to report a position with a candidate's campaign committee.

If you have nothing to report, indicate "not applicable".

QUESTION 8 – (a) Licensed Professions, (b), (b-1) (b-2) and (c) Clients and (d) Business Investments:

Question 8(a): applies to you if you practice certain licensed professions:

- Law;
- Real estate (as a broker or agent);
- A profession licensed by the department of education*(see list); or
- If you are a member or employee of a firm registered as a lobbyist.

You must report:

- The licensed profession;
- A description of the services rendered for compensation (including subject areas);
- Whether services were provided directly to clients or not; and
 - If you practice with a firm or corporation and are a partner or shareholder of the firm or corporation, provide a general description of the principal subject areas of matters undertaken by the firm or corporation

If you are licensed in a profession but did not engage in the practice in 2024, report that you are licensed in the profession but not practicing.

If you have nothing to report, indicate "not applicable" on the appropriate part of this question.

*Professions Licensed by the Department of Education:

- Acupuncture
- Applied Behavior Analysis
 - o Licensed Behavior Analysts
 - Certified Behavior Analyst Assistants
- Architecture
- Athletic Training
- Audiology
- Certified Shorthand Reporting
- Chiropractic
- Clinical Laboratory Technology
 - o Clinical Laboratory Technologists
 - Cytotechnologists
 - o Clinical Laboratory Technicians
 - Histotechnologists
 - o Histotechnicians
 - Certified Histological Technicians
- Dentistry
 - Dentists
 - Dental Hygienists
 - o Registered Dental Assistants
- Dietetics-Nutrition
- Engineering
- Geology
- Interior Design
- Land Surveying
- Landscape Architecture
- Massage Therapy
- Medical Physics
- Medicine
 - Physicians
 - o Physicians Assistants
 - Specialist Assistants
- Mental Health Practitioners
 - Creative Arts Therapists
 - Marriage and Family Therapists
 - o Mental Health Counselors
 - Psychoanalysts

- Midwifery
- Nursing
 - o Registered Professional Nurses
 - o Nurse Practitioners
 - Clinical Nurse Specialists
 - o Licensed Practical Nurses
- Occupational Therapy
 - o Occupational Therapists
 - o Occupational Therapy Assistants
- Ophthalmic Dispensing
- Optometry
- Pathologists' Assistant
- Perfusion
- Pharmacy
 - o Pharmacists
 - Pharmacy Establishments
 - Registered Pharmacy Technicians
- Physical Therapy
 - Physical Therapists
 - Physical Therapist Assistants
- Podiatry
- Polysomnographic Technology
- Psychology
- Public Accountancy
 - o Certified Public Accountants
- Respiratory Therapy
 - o Respiratory Therapists
 - o Respiratory Therapy Technicians
- Social Work
 - Licensed Master Social Worker (LMSW)
 - Licensed Clinical Social Worker (LCSW)
- Speech-Language Pathology
- Veterinary Medicine
 - o Veterinarian
 - o Veterinary Technician

Question 8(b): The current filing does not include the time period for this question, it is "Not Applicable" to all filers.

Client Reporting

You do not need to report Clients or Customers with respect to matters for which you (or your firm) were retained before you entered office or began employment.

Questions 8(b-1), (b-2)(i), (b-2)(ii) and (c) are applicable for this filing if you were retained by a client or customer for a matter on or after December 31, 2015. If these questions are not applicable to you, please indicate the same.

<u>Question 8(b-1)</u> is applicable to you if you referred clients to your firm for matters before state agencies, or you provided such services.

Question 8(b-2)(i) is applicable to you if you earned more than \$10,000 from your law practice AND any client paid more than \$5,000 for those services.

If you did not provide services directly to clients, describe your services on <u>Question 8(b-2)(ii)</u>.

Report any clients referred to you by a lobbyist on Question 8(c).

<u>Detailed guidance on completing Questions 8(b-1), (b-2)(i), (b-2)(ii) and (c) is in Appendix A of this guide.</u>

For information on client exemption requests please contact the Legislative Ethics Commission or see legethics.ny.gov.

Question 8(d) requires certain business investments to be reported.

Report any business entities in which you or your spouse or domestic partner had an investment of more than \$1,000, *other than investments in securities or real property*. Report the name and address of the business and a description of the nature of the business.

A business investment in a security may be reportable under <u>Question 16</u>. A business investment in real property may be reportable under <u>Question 17</u>.

If you have nothing to report, indicate "not applicable".

QUESTION 9 - Gifts:

<u>Question 9</u>: Report gifts worth more than \$1,000, in aggregate from each source, received by you, your spouse, or domestic partner, or an unemancipated child during 2024. "Gift" refers to a transfer made gratuitously of any real or personal property, benefit, or gain and is not limited to money.

Gifts from relatives*, political campaign contributions, inheritances, and certain types of reimbursed travel expenses are **not** considered reportable gifts. See <u>Question 10</u> for information about travel expenses or travel reimbursements. Distributions from trusts or estates are not gifts, but may be reportable under other questions.

The value of reportable gifts is the annual aggregate value of gifts from a single donor to a single recipient. Thus, if a donor gave gifts worth \$750 to you twice during the year 2024, you would have a reportable gift of category "C" value (\$1,500). Please indicate the category of value and the nature of **each** gift as well as the name and address of the donor.

If you have nothing to report, indicate "not applicable".

* "Relative" means spouse, child, stepchild, parent, stepparent, or any person who is a direct descendent of your grandparents or your spouse's grandparents.

QUESTION 10 - Travel Reimbursements:

<u>Question 10</u>: Report reimbursements of travel expenses of more than \$1,000, in the aggregate from each source, that were provided by non-governmental sources for activities related to your official duties. **This includes direct payments to others, for example hotels or airlines, made on your behalf.**

You do not need to report travel reimbursements received from political organizations or campaign committees that are reportable in a duly filed campaign finance report or business travel paid for by a private employer to conduct its business.

Please contact the LEC with any questions regarding travel expenses.

If you have nothing to report, indicate "not applicable".

QUESTION 11 - Other Beneficial Interests:

Question 11: You are required to report information on interests of more than \$1,000 in retirement plans, trusts and deferred compensation plans held by you even though the interest may not have been a source of income to you during 2024. Remember to indicate the category of value of your interest, if it is reasonably ascertainable.

Identify any Keogh plans, annuities, IRAs and all retirement plans (other than those of New York State or New York City) in which you held an interest. **List all deferred compensation plans including state or local government plans. List TIAA accounts that are not your primary retirement benefit.**

For IRAs, if you received income of more than \$1,000 from distributions in 2024, report such income under <u>Question 13</u>. If you had an IRA invested in a security, including a mutual fund,

with a market value of more than \$1,000, report that security under <u>Question 16</u>. Funds held within a New York State Deferred Compensation Plan may also be reportable on Question 16.

For purposes of disclosing the identity and value of a trust, retirement plan, or deferred compensation plan, account statements containing account numbers, social security numbers, or a home address **should not** be attached to or included in the financial disclosure filing. Such information, if attached, will be available for public inspection.

You do **not** need to report the following: interests in a trust, estate, or other beneficial interest established by, for, or in the estate of a relative; any interest in a 529 College Savings Plan or an Education IRA; trusts which you established to benefit others; New York State or New York City defined benefit retirement plans; SUNY/CUNY Optional Retirement Program (ORP), including TIAA-CREF, Fidelity, VALIC, Voya or other investment provider. Deferred income in the nature of delayed compensation, including deferred or future income from the practice of a profession is reportable in response to Question 14.

If you have nothing to report, indicate "not applicable".

QUESTION 12 - Agreements or Interests with Former or Future Employers:

Question 12(a): Report the parties to and terms of any contract, promise, or agreement between you and any person or entity for future employment after termination of your term of office or your employment with the legislature.

Question 12(b): If you hold an interest of more than \$1,000 in a pension fund, profit-sharing plan, or employee benefit plan with a former employer, and you have an agreement with the former employer to continue to provide you with continuing benefits or payments, the parties and terms of that agreement must be reported. Such benefits include but are not limited to: life or health insurance premiums; contributions to employee benefit plans, pension or profit-sharing plans; or continued provision of goods, services or compensation. "Former employer" does not include the State of New York.

If you have nothing to report, indicate "not applicable" on the appropriate part of this question.

QUESTION 13 - Income:

Question 13: **Report each** source of income **IN EXCESS of \$1,000** which was received by, or paid to, **you** or **your spouse or domestic partner** during 2024, except income you received from the New York State Legislature (listed on Question 2(a)). Remember to indicate the category of value. If you did not actually receive the income during 2024, but such income is owed to you, report that information on Question 14.

"Income" means aggregate net income before taxes from each source. "Aggregate net income before taxes" means gross receipts less all reasonable and necessary expenses. For example, to compute aggregate net income from real property rentals, reasonable and necessary expenses include interest expense, real property taxes, and depreciation. Only report income if the aggregate net income before taxes is in excess of \$1,000. For securities, you need to list each particular stock or similar interest which has generated aggregate net income in excess of \$1,000. Do not offset losses from one stock or other investment against gains from another stock or investment.

Under "source," you need to identify, **WITH PARTICULARITY**, the name of each business from which you or your spouse or domestic partner received the income. For example, it is not sufficient to disclose the general practice of a profession without disclosing the entity providing the income. Further, for bank interest income, you need to name each bank from which you received more than \$1,000 in interest income. For income from the sale or rental of real property, the source is the location (street and locality address) of the property, not the tenants' or purchasers' names. Do not disclose the names of tenants or purchasers.

Under "nature" of income you need to identify the type of income (bank interest, stock dividends, partnership income, salary, wages, commission, etc.) received from that source.

Please note that this question may require you to report income that is not listed on your income tax return. Income includes payments received from a judgment, a pension plan, annuity, deferred compensation plan, profit-sharing plan, IRA, Keogh plan, and recognized gains from the sale of real property. "Recognized gain" refers to a gain recognized under the Internal Revenue Code.

You do not need to include the following: receipt of maintenance, alimony, or child support; foster care subsidies; unemployment insurance benefits; workers compensation payments; governmental disability payments; social security benefits; death benefits, or public assistance benefits received by you, your spouse or domestic partner, or unemancipated children.

If you have nothing to report, indicate "not applicable".

QUESTION 14 - Deferred Income:

Question 14: Report the source of income in excess of \$1,000 which is owed to you for work performed, but which will not be paid to you until after 2024.

You do not need to report the retirement or deferred income plans that are reported under <u>Question 11</u>. You do not need to report lag pay from the State of New York as deferred compensation.

If you have nothing to report, indicate "not applicable".

QUESTION 15 - Assignments:

Question 15: Report each assignment of income or transfer of assets in excess of \$1,000. An "assignment" is a transfer of the right to such income to another. You must also report each transfer in excess of \$1,000 of an interest in a trust, estate, other benefit, securities, or real property in which the transfer is for less than fair market value.

You do not need to report transfers of interests or income assignments to a relative.

If you have nothing to report, indicate "not applicable".

QUESTION 16 - Securities:

Question 16: Report your **or** your spouse's or domestic partner's interest in a security with a fair market value of more than \$1,000 at the end of the tax year. Remember to indicate the category of value. Report only those securities having a value in excess of \$1,000 that you or your spouse or domestic partner **held on December 31, 2024**. You must identify the name of the issuing entity (corporation, etc.) whose securities you or your spouse or domestic partner held.

You need to identify mutual or investment funds, including those held through the Individual Retirement Account ("IRA") but you do not need to list the individual securities held by such mutual funds. For partnerships or investment clubs, you need to report those securities where your or your spouse's or domestic partner's name appears on the security document or certificate. You also need to list securities held for your benefit by a brokerage firm or nominee. You may aggregate all similar types of securities from the same issuing entity and report the total value.

For example, multiple bonds from the same issuing entity can be reported in the aggregate:

Self/ Spouse	Issuing Entity	Type of Security	% Owned	Category of Value	
or Domes Partner	Stic				
Self	Municipal Assistance Corp. of NY	Bonds	N/A	С	_
Joint	Fidelity Magellan	Mutual Fund	N/A	С	
Spouse	General Electric	Common Stock	N/A	D	

Below is another example of a response to <u>Question 16</u>, reporting mutual funds held within a New York State Deferred Compensation Plan:

Self/ Spouse or Domestic Partner	Issuing Entity	Type of Security	% Owned	Categor of Valu	•	
Self	Delaware Small-Cap V	alue Fund Instituti	onal Mutua	ıl Fund	N/A	E
Self	NYSDCB Russell 2500	Index Unitized Acc	ount Mutua	al Fund	N/A	Н
Self	NYSDCB Equity Indx.	Unitized Account	Mutua	l Fund	N/A	С
Self	T.Rowe Price Blue Chi	p Growth Trust	Mutua	l Fund	N/A	E
Self	Vangard Prime Cap Fu	ınd – Adm. Shares	Mutua	l Fund	N/A	F
Self	Vangard Wellington F	und – Adm. Shares	Mutua	ıl Fund	N/A	I

If you need guidance on whether interests in more specialized security transactions (margin accounts, for example) are reportable, you may contact the Commission for advice.

You do not need to list the serial number, issue year, or type of any bonds, if you indicate the issuing entity and the aggregate value of all bonds from that entity. Do not report U.S. savings bonds. You do not need to report a security interest in a co-op that is your primary or secondary residence, unless there is a co-owner who is not a relative. You do not need to report savings, checking, or money market accounts as securities. You do not need to report notes or mortgages held by you or your spouse or domestic partner which are made to a family member.

For purposes of disclosing securities held in a retirement plan or deferred compensation plan, account statements containing account numbers, social security numbers, or a home address **should not** be attached to or included in the financial disclosure filing. Such information, if attached, will be available for public inspection.

If you have nothing to report, indicate "not applicable".

QUESTION 16-a - Digital Assets:

Question 16-a: This question requires you to disclose any digital assets that are held by you, your spouse or domestic partner, or by a corporation that owns the digital assets for investment purposes where you, your spouse or domestic partner own more than 50% of the stock of such corporation. Please report the person who holds the interest in the digital asset (self, spouse, domestic partner, or name of corporation), the name of the digital asset (ex. Bitcoin, Ethereum, etc.), the type of the digital asset (ex. cryptocurrency, non-fungible tokens, exchange tokens, asset-backed tokens, etc.), and finally the category of market value as of December 31st of calendar year 2024 (from Table II which is provided at the back of the form and at the end of this guidebook).

Below is an example of a response to question 16-a reporting an interest in cryptocurrency and an NFT:

Self/Spouse T or Domestic Partner			as of the close of the taxable year last occurring prior to the filing of this statement (In Table II).
Self B	Bitcoin	Cryptocurrency	Е
Spouse V	Winds of the Sea #658	NFT	D

If you need guidance on whether a digital asset is reportable, you may contact the Commission for advice.

If you have nothing to report, indicate "not applicable".

QUESTION 17 - Real Property:

Question 17: Report real property interests held by you, your spouse or domestic partner, or a corporation in which you or your spouse or domestic partner own more than fifty percent (50%) of the stock must be reported. Remember to include the category of value. For partnerships, you need to report real property if your or your spouse's or domestic partner's

name appears on the deed. You need to report disclosable real property that was sold during the reporting period, although you may indicate you no longer have an interest in the property. Report real property owned by a corporation if you or your spouse or domestic partner are named as an owner on the deed or if it is property owned by a corporation of which more than fifty percent of the stock of the corporation was owned by you or your spouse or domestic partner during 2024.

Under "location", indicate the street and locality where the property exists. "Market value" means your good faith estimate of the fair market value of the entire property, not just your interest in the property. You are not required to obtain an appraisal.

Interests in co-ops should be reported here (Question 17) unless the co-op is your primary or secondary residence.

You do not need to list the real property that is your primary or secondary residence unless there is a co-owner who is not a relative. You do not need to identify any co-owners. If you receive income from the property, even though the property is your primary or secondary residence, you may be required to report it under <u>Question 13</u>.

If you have nothing to report, indicate "not applicable".

QUESTION 18 - Notes and Accounts Receivable:

Question 18: Report notes and accounts receivable in excess of \$1,000 that were owed to you on December 31, 2024.

You do **not** need to report such notes or accounts receivable that are owed to you from a relative or those owed from the sale of goods or services. You do not need to report loans from you to your own campaign fund. You do not need to duplicate information previously reported under <u>Question 14</u>. "Other debts owed to you" includes final judgments or obligations which may not be in writing.

If you have nothing to report, indicate "not applicable".

QUESTION 19 - Liabilities:

Question 19: Identify each liability you and your spouse or domestic partner owe in **excess** of \$10,000 as of the date of filing this statement. Liabilities include borrowing against your insurance policy. You must also report any credit cards with a balance in excess of \$10,000, unless the balance would be less than \$10,000 if you subtracted the charges for the items excluded below.

Do Not Report:

- Maintenance paid in connection with a matrimonial action, alimony, or child support;
- Loans, including home equity loans, issued in the ordinary course of business by a financial institution for education costs, home purchase, or improvements to a primary or secondary residence, purchase of a personal automobile, or household furniture or appliances;
- Liabilities to a relative or those incurred in the ordinary course of you or your spouse's or domestic partner's trade;
- Liabilities between principals of a business for the purpose of promoting the business enterprise;
- Loans from your Public Employees Retirement account ("PERS");
- Automobile, house or apartment leases;
- Loans which are reportable by your campaign account.

If you have reportable liabilities, remember to indicate the category of value.

If you have nothing to report, indicate "not applicable".

Review of the Statement and Penalties

The Legislative Ethics Commission reviews each statement for compliance with the disclosure requirements. If the statement appears to be unclear or incomplete, the Commission will notify you and provide you with an opportunity to amend the statement. Annual Statements of Financial Disclosure will be forwarded to the Commission on Ethics and Lobbying in Government (COELIG) where they will be filed and may be selected for random review.

The law provides that an individual, who knowingly and willfully fails to file an Annual Statement of Financial Disclosure or who knowingly and willfully with intent to deceive makes a false statement or gives information which such individual knows to be false on such Statement of Financial Disclosure, shall be subject to a civil penalty in an amount not to exceed forty thousand dollars. Assessment of a civil penalty shall be made by the Legislative Ethics Commission with respect to persons subject to its jurisdiction.

In lieu of or in addition to, a civil penalty, the Legislative Ethics Commission may refer a violation to the appropriate prosecutor and upon such conviction, but only after such

referral, such violation shall be punishable as a class A misdemeanor. A civil penalty for false filing may not be imposed in the event a category of "value" or "amount" reported is incorrect unless such reported information is falsely understated. Notwithstanding any other provision of law to the contrary, no other penalty, civil or criminal, may be imposed for a failure to file or for a false filing of such statement except that the appointing authority may impose disciplinary action as otherwise provided by law.

Category of Income Tables

TABLE I

Use for Questions 9, 13, 14, 15

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

Category	NN	\$3,250,000	to under	\$3,350,000
Category	00	\$3,350,000	to under	\$3,450,000
Category	PP	\$3,450,000	to under	\$3,550,000
Category	QQ	\$3,550,000	to under	\$3,650,000
Category	RR	\$3,650,000	to under	\$3,750,000
Category	SS	\$3,750,000	to under	\$3,850,000
Category	TT	\$3,850,000	to under	\$3,950,000
Category	UU	\$3,950,000	to under	\$4,050,000
Category	VV	\$4,050,000	to under	\$4,150,000
Category	WW	\$4,150,000	to under	\$4,250,000
Category	XX	\$4,250,000	to under	\$4,350,000
Category	YY	\$4,350,000	to under	\$4,450,000
Category	ZZ	\$4,450,000	to under	\$4,550,000
Category	AAA	\$4,550,000	to under	\$4,650,000
Category	BBB	\$4,650,000	to under	\$4,750,000
Category	CCC	\$4,750,000	to under	\$4,850,000
Category	DDD	\$4,850,000	to under	\$4,950,000
Category	EEE	\$4,950,000	to under	\$5,050,000
Category	FFF	\$5,050,000	to under	\$5,150,000
Category	GGG	\$5,150,000	to under	\$5,250,000
Category	ННН	\$5,250,000	to under	\$5,350,000
Category	III	\$5,350,000	to under	\$5,450,000
Category	III	\$5,450,000	to under	\$5,550,000
Category	KKK	\$5,550,000	to under	\$5,650,000
Category	LLL	\$5,650,000	to under	\$5,750,000
Category	MMM	\$5,750,000	to under	\$5,850,000
Category	NNN	\$5,580,000	to under	\$5,950,000
Category		\$5,950,000	to under	\$6,050,000
Category	PPP	\$6,050,000	to under	\$6,150,000
Category	QQQ	\$6,150,000	to under	\$6,250,000
Category		\$6,250,000	to under	\$6,350,000
Category	SSS	\$6,350,000	to under	\$6,450,000
Category		\$6,450,000	to under	\$6,550,000
Category		\$6,550,000	to under	\$6,650,000
Category		\$6,650,000	to under	\$6,750,000
Category		\$6,750,000	to under	\$6,850,000
Category		\$6,850,000	to under	\$6,950,000
Category	YYY	\$6,950,000	to under	\$7,050,000
Category		\$7,050,000	to under	\$7,150,000
Category		\$7,150,000	to under	\$7,250,000
Category		\$7,250,000	to under	\$7,350,000
Category		\$7,350,000	to under	\$7,450,000
Category		\$7,450,000	to under	\$7,550,000
Category		\$7,550,000	to under	\$7,650,000
Category		\$7,650,000	to under	\$7,750,000
Category		\$7,750,000	to under	\$7,850,000

Category HHHH	\$7,850,000	to under	\$7,950,000
Category IIII	\$7,950,000	to under	\$8,050,000
Category JJJJ	\$8,050,000	to under	\$8,150,000
Category KKKK	\$8,150,000	to under	\$8,250,000
Category LLLL	\$8,250,000	to under	\$8,350,000
Category MMMM	\$8,350,000	to under	\$8,450,000
Category NNNN	\$8,450,000	to under	\$8,550,000
Category 0000	\$8,550,000	to under	\$8,650,000
Category PPPP	\$8,650,000	to under	\$8,750,000
Category QQQQ	\$8,750,000	to under	\$8,850,000
Category RRRR	\$8,850,000	to under	\$8,950,000
Category SSSS	\$8,950,000	to under	\$9,050,000
Category TTTT	\$9,050,000	to under	\$9,150,000
Category UUUU	\$9,150,000	to under	\$9,250,000
Category VVVV	\$9,250,000	to under	\$9,350,000
Category WWWW	\$9,350,000	to under	\$9,450,000
Category XXXX	\$9,450,000	to under	\$9,550,000
Category YYYY	\$9,550,000	to under	\$9,650,000
Category ZZZZ	\$9,650,000	to under	\$9,750,000
Category AAAAA	\$9,750,000	to under	\$9,850,000
Category BBBBB	\$9,850,000	to under	\$9,950,000
Category CCCCC	\$9,950,000	to under	\$10,000,000
Category DDDDD	\$10,000,000	or over	

TABLE II

Use for Questions 6, 11, 16, 16-a, 17, 18, 19

Category A	none				
Category B	\$ 1 to under	\$ 1,000			
Category C	\$ 1,000 to under	\$ 5,000			
Category D	\$ 5,000 to under	\$ 20,000			
Category E	\$ 20,000 to under	\$ 50,000			
Category F	\$ 50,000 to under	\$ 75,000			
Category G	\$ 75,000 to under	\$ 100,000			
Category H	\$ 100,000 to under	\$ 150,000			
Category I	\$ 150,000 to under	\$ 250,000			
Category J	\$ 250,000 to under	\$ 500,000			
Category K	\$ 500,000 to under	\$ 750,000			
Category L	\$ 750,000 to under	\$1,000,000			
Category M	\$1,000,000 to under	\$1,250,000			
Category N	\$1,250,000 to under	\$1,500,000			
Category 0	\$1,500,000 to under	\$1,750,000			
Category P	\$1,750,000 to under	\$2,000,000			

Category Q	\$2,000,000	to under	\$2,250,000
Category R	\$2,250,000	to under	\$2,500,000
Category S	\$2,500,000	to under	\$2,750,000
Category T	\$2,750,000	to under	\$3,000,000
Category U	\$3,000,000	to under	\$3,250,000
Category V	\$3,250,000	to under	\$3,500,000
Category W	\$3,500,000	to under	\$3,750,000
Category X	\$3,750,000	to under	\$4,000,000
Category Y	\$4,000,000	to under	\$4,250,000
Category Z	\$4,250,000	to under	\$4,500,000
Category AA	\$4,500,000	to under	\$4,750,000
Category BB	\$4,750,000	to under	\$5,000,000
Category CC	\$5,000,000	to under	\$5,250,000
Category DD	\$5,250,000	to under	\$5,500,000
Category EE	\$5,500,000	to under	\$5,750,000
Category FF	\$5,750,000	to under	\$6,000,000
Category GG	\$6,000,000	to under	\$6,250,000
Category HH	\$6,250,000	to under	\$6,500,000
Category II	\$6,500,000	to under	\$6,750,000
Category JJ	\$6,750,000	to under	\$7,000,000
Category KK	\$7,000,000	to under	\$7,250,000
Category LL	\$7,250,000	to under	\$7,500,000
Category MM	\$7,500,000	to under	\$7,750,000
Category NN	\$7,750,000	to under	\$8,000,000
Category 00	\$8,000,000	to under	\$8,250,000
Category PP	\$8,250,000	to under	\$8,500,000
Category QQ	\$8,500,000	to under	\$8,750,000
Category RR	\$8,750,000	to under	\$9,000,000
Category SS	\$9,000,000	to under	\$9,250,000
Category TT	\$9,250,000	to under	\$9,500,000
Category UU	\$9,500,000	or over	

Appendix A: Annual Statement of Financial Disclosure Client Disclosure Requirements

Public Officers Law Section 73-a(3)

For New Clients or New Matters for existing Clients on or after December 31, 2015.

Clients, descriptions of services, and associated income must be reported on the following questions:

Question 8(b-1) - Clients with Matters before State Agencies

- Reporting Individual provided services (consultation, representation, advice or other services) to a client or referred client to his or her firm; and
- Fees received by reporting individual or his or her firm in excess of \$10,000 for:
 - State contract totaling **\$10,000** or more;
 - State grant of \$10,000 or more;
 - Legislative initiative grant;
 - o Non-ministerial matter before a state agency.

Question 8(b-2)(i)

- Reporting Individual receives \$10,000 or more from employment activity reportable under 8(a); *and*
- Fees in excess of \$5,000 paid to reporting individual *or* billed by reporting individual's firm (with reporting individual's knowledge) for reporting individual's services.

Question 8(b-2)(ii)

• This section does not require that **clients** be reported but states that if a reporting individual disclosed, in Question 8(a), that he or she provided services to a firm or business but did not provide service to clients, he or she must disclose the amount of income received for such services and a description of the services rendered.

Question 8(c) - Clients Referred by a Lobbyist

• Reporting Individual receives \$10,000 or more from employment activity reportable under 8(a); *and*

- A registered lobbyist has (successfully) directly referred a client to the reporting individual's business; and
- The reporting individual or firm received a fee in excess of \$5,000.

Please note: the client as well as the lobbyist who referred the client must be reported.

Clients Exempt from Reporting on Questions 8(b-1); (b-2) and (c):

- Medical, pharmaceutical or dental services;
- Mental health services;
- Residential real estate brokering services;
- Legal representation of clients relative to:
 - o Investigation or prosecution by law enforcement authorities;
 - Bankruptcy;
 - Family court;
 - Estate planning;
 - Domestic relations matters:
 - o Individuals represented pursuant to an insurance policy (list only the entity providing compensation to the reporting individual).

<u>Initials to be reported in lieu of client's name:</u>

- Matters where client's name is required to be kept confidential;
- A client who is a minor.

Representation with respect to an Initial Public Offering:

- If you or your firm has provided legal representation with respect to an IPO, indicate on questions (b-1) and (b-2) that a disclosure to the office of court administration has been made.
- Upon such time that the information in the locked box can be appropriately disclosed, the reporting individual will file an amendment to report the relevant information on questions (b1) and (b-2).

For information on client exemption requests please contact the Legislative Ethics Commission or see legethics.ny.gov.