

CONFLICT OF INTEREST ANNUAL DISCLOSURE STATEMENT AND CERTIFICATION

Preliminary Statement

The purpose of this Disclosure Statement is to identify any direct or indirect economic interest of any current Trustee, Officer of the College, Key Employees including the Five Highest Compensated Employees of Ithaca College (as reported on the IRS Form 990) and the community it serves.

Completion of this Disclosure Statement will assist the Trustees in discharging their duties under the Ithaca College Conflict of Interest Policy for Members of the Board, Officers of the College, Key Employees including the Five Highest Compensated Employees and will assist Ithaca College in complying with its obligations as a tax-exempt organization described in section 501 (c)(3) of the Internal Revenue Code, including its obligation to make certain disclosures on its IRS Form 990.

References in this Disclosure Statement to companies which do business with Ithaca College include all organizations from whom Ithaca College purchases merchandise, materials, equipment, supplies (of all kinds) or from whom Ithaca College purchases services, including services provided by insurance companies and agents, contractors for constructing and equipping buildings, lessors of equipment and facilities, etc.

Upon completion, this Disclosure Statement should be returned to the Secretary to the Board of Trustees.

Defined Terms

The following terms as used in this Disclosure Statement shall have the following meanings:

"Business relationship" means any employment or contractual relationship, and common ownership of a business where any officers or trustees, individually or together, possess more than 35 percent ownership interest in common. "Ownership" is voting power in a corporation, profits interest in a partnership, or beneficial interest in a trust.

"Compensation" shall mean the direct or indirect payment of remuneration in any form, including but not limited to, any wage, salary, fee, benefit, gift, gratuity, favor, discount or bargain that are not insubstantial.

"Family" includes an individual's spouse or domestic partner; siblings and siblings of an individual's spouse or domestic partner; ancestors; children, grandchildren and great grandchildren; spouses or domestic partners of siblings, children, grandchildren and great grandchildren; as well as persons with whom an individual has a step-relationship, as applicable, of the type described above and/or others as to whom it would reasonably appear that the individual has a relationship involving an interest in such person comparable to those listed above.

"Officer" shall mean the president, vice-presidents, and the five highest compensated employees of Ithaca College as defined in the IRS Form 990.

"Audit Committee" shall mean the committee appointed by the Ithaca College Board of Trustees to administer, among other things, conflicts of interest matters.

"Transaction" shall mean any transaction in which an economic benefit is provided by Ithaca College directly or indirectly to or for the use of another person or entity. Included within this definition is any purchase or sale of real estate, goods or services, even if purchased at a discount.

"Trustee" shall mean a voting member of the Ithaca College Board of Trustees.

QUESTIONS

IF YOU ANSWER "YES" TO ANY OF THE FOLLOWING QUESTIONS, please provide details in the space provided following each question.

1. Are you or any member of your *family* a director, officer, trustee, employee, manager, advisor, or consultant of any partnership, corporation, limited liability company, or other entity that currently has or is in the process of entering into a *business relationship* or *transaction* with Ithaca College? If yes, please list all such persons and relationships.

Yes _____ No _____

2. Are you a director, officer, trustee, employee, manager, advisor, or consultant of an institution of higher education (or do you have interest, directly, indirectly, or beneficially in such an institution) other than Ithaca College? If yes, please list the names of the institutions and your relationships.

Yes _____ No _____

3. To your knowledge, did you or any member of your family receive any gifts during the last 12 months from any company or organization from which Ithaca College purchases goods or services or with which Ithaca College has a *business relationship*? If yes, please describe.

Yes _____ No _____

4. Except for securities which are listed on a national exchange, do you or a member of your family own (directly, indirectly, or beneficially) a 5 percent or greater interest in (or right to purchase a 5 percent or greater interest in) a partnership, corporation, limited liability company or other entity? If yes, please list the company, number of shares/units, percent of total, and approximate market value.

Yes _____ No _____

5. To your knowledge does any entity listed in response to question number 4 have a *business relationship or transaction* with Ithaca College (or is such an entity in the process of entering into a *business relationship or transaction* with Ithaca College)? If yes, please list the entity and the business relationship or transaction.

Yes _____ No _____

6. Does there presently exist or has there existed within the past 24 months a creditor-debtor relationship between you and any member of your family and any organization (other than a bank or other financial organization) that currently has or is in the process of entering into a *business relationship or transaction* with Ithaca College? If yes, please describe the relationship. (For this purpose, do not reference normal charge accounts and installment purchase accounts.)

Yes _____ No _____

7. Are you or any member of your family receiving any *compensation* from a partnership, corporation, limited liability company or any other entity that currently has or is in the process of entering into a *business relationship or transaction* with Ithaca College, either directly or through a third person (excluding any relationship previously disclosed above)? If yes, please list the amount of *compensation*, the entity providing such *compensation* and the reason for such *compensation*.

Yes _____ No _____

8. In addition to the information reported above, do you or a member of your *family* have any direct or indirect business relationship or personal interest which may reasonably be considered to have some influence on your judgment and decisions involving transactions with Ithaca College? If yes, please explain.

Yes _____ No _____

9. Attached to this Disclosure Statement is Schedule A listing the names of individuals who are currently serving as trustees, officers, the five highest compensated employees, and Highly Compensated Independent Contractors for Professional and other Services of Ithaca College. This information is an important part of Ithaca College's effort to file a complete and accurate IRS Form 990.

- a. Is any person listed on Schedule A a member of your family? If yes, please explain.

Yes _____ No _____

- b. Are you an employee of any person or entity listed on Schedule A? If yes, please explain.

Yes _____ No _____

- c. Have you personally entered into a written business contract with any person or entity listed on Schedule A? If yes, please explain.

Yes _____ No _____

- d. To your knowledge, do you personally have, when combined with every other person or entity listed on Schedule A, more than 35 percent ownership interest in any corporation, partnership, or trust? If yes, please explain.

Yes _____ No _____

CERTIFICATION

To the best of my knowledge the answers to all of the above questions are true and complete in every respect.

I understand that if I am involved in situations where a possible conflict of interest might occur or be perceived, I may be asked to disassociate myself from such situations. I will comply with any conditions or restrictions imposed by the Audit Committee to manage any potential conflict of interest.

I understand that Ithaca College is a section 501(c)(3) organization and that it must engage primarily in activities which accomplish one or more of its tax-exempt purposes in order to maintain its federal tax exemption. Identifying and understanding relationships between key College leaders and contractors, and disclosing and discerning transactions and arrangements involving College officials and trustees that might be adverse to the College or being in the private interest of a College official or trustee are important safeguards in protecting the College's tax-exempt status.

I agree to annually submit a Conflict of Interest Disclosure Statement and Certification. In addition, if at any time after the date hereof either I or a member of my family acquire or receive an economic interest that was not previously disclosed (or otherwise need to correct or update the information provided in this Disclosure Statement), I agree to submit a revised Conflict of Interest Disclosure Statement and Certification.

Date: _____

Name (Print): _____

Signature: _____