



State of Rhode Island
Office of the General Treasurer

James A Diossa
General Treasurer

The Rhode Island Office of the General Treasurer has a commitment to high ethical standards. With today’s competitive and rapidly challenging business climate, integrity and high ethical behavior mean more now than ever before. I am writing to you to ensure that our office abides by the rules and laws drafted by the Securities and Exchange Commission (SEC), including the Investment Advisers Act of 1940 CFR Part 275, Rule 206(4)-5 and the Municipal Securities Rulemaking Board (MSRB), including Rule G-37. Rhode Island has a policy in place banning use of and payment to placement agents for investments in Rhode Island. Firms must certify they meet this standard and also disclose a list of placement agents they employ outside of Rhode Island.

The rules require certain money managers or financial advisers who have donated more than the “de minimis” amount to certain elected officials to serve a two year “time-out” period before providing advisory services to the State for compensation.

By signing below, you are asserting that, to the best of your knowledge, you or any other person from your firm that falls within the scope of the above referenced SEC and MSRB rules have not donated during the two year period prior to the date hereof more than the “de minimis” amount to any government official of the State of Rhode Island that falls within the scope of the rules, including, James A. Diossa, General Treasurer of Rhode Island, and Daniel McKee, Governor of Rhode Island. By signing below, you are also acknowledging that your firm has an obligation to maintain records of political contributions made by employees of your firm to ensure compliance of the SEC and MSRB laws.

Please be advised, that by signing below, you are asserting that your firm will maintain the high standards and integrity of the municipal securities industry and that your firm is familiar with the laws issued by the SEC and/or MSRB, specifically that no broker, dealer or municipal securities dealer shall engage in municipal securities business with an issuer within two years after any contribution to an official of such issuer made by the broker, dealer or municipal securities dealer; any municipal finance professional associated with such broker, dealer or municipal securities dealer; or any political action committee controlled by the broker, dealer or municipal securities dealer or by any municipal finance professional.

If your firm is not subject to these rules, please so indicate below.

Sincerely,

James A Diossa
General Treasurer

Accepted and Agreed:

Our firm is not subject to these rules:

Firm: _____
By: _____
Date: _____

Firm: _____
By: _____
Date: _____