CITY OF SAN ANTONIO AGENDA ITEM NO. 27 EPARTMENT INTERDEPARTMENTAL MEMORANDUM FINANCE DEPARTMENT

TO: Mayor and City Council

FROM: Milo D. Nitschke, Director, Finance Department

THROUGH: Terry M. Brechtel, City Manager

Melissa Byrne Vossmer, Assistant City Manager; City Attorney's Office; City COPIES:

Clerk; File

City of San Antonio Investment Policy Annual Review SUBJECT:

DATE: September 30, 2004

SUMMARY AND RECOMMENDATION

This ordinance approves an Investment Policy for the City of San Antonio, Texas, in accordance with the requirement of the Texas Public Funds Investment Act (the "Act"), as amended, for City Council to annually review and approve the City's Investment Policy; designates certain employees as Investment Officers for the City of San Antonio; and provides for an immediate effective date.

Staff recommends approval of this Ordinance.

BACKGROUND INFORMATION

The purpose of the City's Investment Policy is to provide a framework for the prudent and efficient investment of City funds, with the objectives of preservation and safeguarding of principal, liquidity, diversification, and return on investments. The City's Investment Policy designates the following employees as Investment Officers for the City of San Antonio: Director of Finance, Assistant Directors of Finance, Tax Assessor, Division of Financial Management: Financial Manager, Financial Analyst, Investment Officer, and Finance Officers. The City's Investment Committee is comprised of two representatives from the City Council, two representatives from the City Manager's Office, the Director of Finance, Assistant Directors of Finance, Controller, Tax Assessor, Director of the Office of Management and Budget and the following individuals from the Division of Financial Management: Financial Manager, Financial Analyst, Investment Officer and Finance Officers.

The Act requires an annual review of the Investment Policy by City Council. The proposed Investment Policy updates the existing policy that was approved by City Council on September 11, 2003, and contains only minimal changes. These changes include (1) in the investment strategy section, the name of the Solid Waste Fund was changed to the Environmental Services Fund; and (2) in the investment strategy section, the Convention Center Expansion Project is no longer listed as an example of a fund in which the Capital Projects Funds strategy applies. This change was made because of the completion of the Convention Center Expansion Project. The proposed changes to the Investment Policy were reviewed and approved by the City's Investment Committee on September 14, 2004.

In accordance with the Act and the City's Investment Policy, a Request for Qualifications to Provide Broker/Dealer Services to the City of San Antonio ("Broker/Dealer RFQ") was mailed to fifty-one (51) firms on July 19, 2004. On August 20, 2004, thirty-seven (37) firms responded. The written proposals were scored according to the criteria incorporated in the Broker/Dealer RFQ, which included Fixed Income Desk Existence, Experience, Firm Stability, Market Data, Quality of the Written Response, Professionalism and Knowledge, Business Practice and Customer Service, and Small Business Economic Development Advocacy Program goals. The proposals were scored within three (3) categories based on capital: firms with capital greater than \$500,000,000; firms with capital greater than \$20,000,000 but less than \$500,000,000; and firms with capital less than \$20,000,000. The scoring in these three categories provided a better opportunity for large, medium, small, local, and SBEDA firms to compete with one another. The highest scoring firms in each category were recommended to the City's Investment Committee.

On September 14, 2004, the following firms were approved by the City's Investment Committee to engage in investment transactions with the City for a two-year period beginning October 1, 2004 through September 30, 2006.

- Citigroup Global Markets Inc.
- First Southwest Company
- Frost National Bank
- Great Pacific Securities
- Intercontinental Asset Management Group, Ltd*
- J.P. Morgan Securities Inc
- Loop Capital Markets*

- Merrill Lynch
- Morgan Keegan & Company, Inc.
- Pryor Doley Securities*
- Raymond James & Associates Inc.
- Seattle Northwest Securities
- Southwest Securities
- Wells Fargo Brokerage Services, LLC.
- Zions First National Bank

While it is anticipated that these firms will remain in effect for a two-year period, the City's Investment Committee is required to review, revise and adopt, at least once per year, the list of qualified eligible Broker/Dealers and banks with whom the City does business and will perform a review of these firms prior to the commencement of Fiscal Year 2006.

^{*}SBEDA firm.

In accordance with the Act and the City's Investment Policy, a Request for Qualifications to Provide Money Market and Mutual Fund Investment Services to the City of San Antonio ("Money Market RFQ") was mailed to twenty-two (22) firms on July 19, 2004. On August 20, 2004, fourteen (14) firms responded. The written proposals were scored according to the criteria incorporated in the Money Market RFQ, which included Qualifications and Experience, Business Practice and Customer Service, Portfolio Performance, Quality of the Written Response, and Small Business Economic Development Advocacy Program goals. The firm with the highest score was proposed to the City's Investment Committee to provide Money Market and Mutual Fund Investment Services.

On September 14, 2004, the following firm was approved by the City's Investment Committee to provide Money Market and Mutual Fund Investment Services to the City for five year period beginning October 1, 2004 through September 30, 2009.

Fidelity Investments

POLICY ANALYSIS

The annual review of the City's Investment Policy and the designation of certain City employees as Investment Officers for the City of San Antonio is consistent with the Act requirements. In addition, the City's Investment Policy complies with all other requirements of the Act and provides the framework that is utilized by City Staff to manage the City's investment portfolio, invest in money market mutual funds and mutual funds and to execute investment transactions with broker/dealers.

FINANCIAL IMPACT

This ordinance has no direct financial impact, however, approval of this Investment Policy provides the mechanism for the prudent, stable and efficient administration of the City's investment activity.

SUPPLEMENTAL COMMENTS

The required disclosures for the aforementioned Broker/Dealer firms and Money Market Mutual Fund firm are attached.

COORDINATION

This action has been coordinated with the City Manager's Office, the departments of Finance, Economic Development and the City Attorney's Office.

SIGNATURES

Milo D. Nitschke

Director, Finance Department

Approved:

Melissa Byrne Vossmer

Assistant City Manager

Terry M. Brechtel

City Manager

Discretionary Contracts Disclosure*
For use of this form, see City of San Antonio Ethics Code, Part D. Sections 182
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

This form is required to be supplemented in the event there is any change in the information under (1), (2), or (3) below, before the discretionary contract is the subject of council action, and no later than five (5) business days after any change about which information is required to be filed.

Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any individual who would be a	party to the discretionary contract:
CITIGROUP GLOBAL MARKETS INC.	
(2) the identity of any business entity! that would	be a party to the discretionary contract:
CITIGROUP GLOBAL MARKETS INC.	
and the name of:	d be a subcontractor on the discretionary contract;
N/A	
and the name of: (B) any individual or business entity that is known entity, of any individual or business entity.	own to be a partner, or a parent or subsidiary business who would be a party to the discretionary contract;
N/A	

A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

N/A			
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Any individual or business entity seeking a discretionary contract with the city shall disclose any known facts which, reasonably understood, raise a question as to whether any city official or employee would violate Section 1 of Part B, Improper Economic Benefit, by participating in official action relating to the discretionary contract.

NONE

Signature:

Title: SENIOR VICE PRESIDENT
BRANCH OFFICE MANAGER
Company:
CITIGROUP GLOBAL MARKETS, INC.

¹ For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1.	Have you or any member	er of your	Firm or	Team to	be assigr	ned to t	his eng	agement e	ver been
	indicted or convicted of	a felony	or misd	emeanor	greater th	ian a C	Class C	in the last	five (5)
	years?								
					\mathcal{L}				
	Circle One	•	YES		NO				

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One YES NO

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One YES NO

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: CITIGROUP GLOBAL MARKETS

Signature of Principal:

C. SCOTT BRUIN

SENIOR VICE PRESIDENT

Printed Name of Principal:

BRANCH OFFICE MANAGER

Title of Principal

Rev. 5/31/02



Litigation question (Attachment III)

"As is the case with most large financial institutions, Citigroup Global Markets Inc. (Citigroup) and its affiliates have from time to time received inquiries and grand jury subpoenas from law enforcement officials relating to the conduct of its customers and its employees. Citigroup and its affiliates operate under strict legal prohibitions relating to the disclosure of such investigations. See e.g., 18 U.S.C. Section 1510. no indictment or judgment of conviction of Citigroup or any of its affiliates has resulted from any such investigation.

From time to time Citigroup Global Markets Inc. ("Citigroup") and its employees are the subject of inquiries and investigations conducted by federal or state regulatory agencies. In addition, Citigroup is involved in a number of civil legal proceedings and arbitration proceedings, concerning matters arising in connection with its business. As a public company, Citigroup Global Markets Holdings Inc. ("CGMHI")the parent company of Citigroup, files periodic reports with the SEC as required by the Securities Exchange Act of 1934 which include current descriptions of material regulatory proceedings, investigations and litigation, if any, concerning Citigroup. To the best of our knowledge, information and belief, we are not aware of any threatened or pending proceedings, investigations or litigation concerning Citigroup or CGMHI which could reasonably be expected to have a material adverse effect on Citigroup's ability to perform the services contemplated by the Request for Proposal. Copies of CGMHI's periodic reports are on file with the SEC. Citigroup's Form BD is on file with the SEC and with each state.

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any	individual who y	would be a party t	o the discretions	ary contract:	
N/A			e e e e e e e e e e e e e e e e e e e		
(2) the identity of any	business entity	that would be a p	arty to the discre	etionary contract:	
First Southwest Comp	any				
and the name of:				# 5a 4	
(A) any individual	or husiness entits	that would be a	subcontractor o	on the discretionary contract;	
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N/A					
and the name of:					
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First Southwest Compa	any is owned by I	First Southwest H	oldings, Inc.		
and Marking all the committee of the contract		 Control of the second of the se	 A second of the control of the control	d for purposes relating to	

discretionary contract.

¹ A business entity means a sole proprietorship, partnership, firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

N/A			
Political Contributions Any individual or business entity seconnection with a proposal for a disc dollars (\$100) or more within the past or former member of City Council, an hat contributes to City Council electifisclosed under (1), (2) or (3) above. It is contributions made by the indicentributions by an entity include, but attorneys, or registered lobbyists of the	retionary co twenty-four y candidate ons, by any Indirect con vidual's sp are not limit	ntract all political (24) months made for City Council, c individual or busi ributions by an ind	directly or indirectly to any current to any political action committee ness entity whose identity must be ividual include, but are not limited utory or common-law. Indirect
Го Whom Made:		Amount:	Date of Contribution:
None.			
		:	
Disclosures in Proposals Any individual or business entity seek facts which, reasonably understood, reviolate Section 1 of Part B, Improper discretionary contract.	aise a quest	ion as to whether	my enty official of employee wor
N/A			
Signature:	Title: Se	enior Vice Presider	t Date:
Lindalallauky	Compar First So	ny: uthwest Company	8/13/04

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

LITIGATION DISCLOSURE

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1. Have you or any member of your Firm or Team to be assigned to this engagement ever been indicted or convicted of a felony or misdemeanor greater than a Class C in the last five (5) years?

Circle One

YES

NO

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One

YES

NO

Except as provided below

FSC has from time to time and in the ordinary course of business had contracts terminated prior to their expiration date. Nome of these terminations, however, was a result of misconduct or failure by FSC to fully perform under the terms of the agreement.

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One

YES

NO

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: First Southwest Company

Signature of Principal:

LINDA CALLAWAY

Printed Name of Principal:

Senior Vice President Title of Principal

Except as provided below

First Southwest Company ("FSC") has not been involved in any claim or litigation with the City of San Antonio, Texas and except as provided below, has not been involved in any claim or litigation relating to the firm's public finance business within the past ten years.

In October, 1997, FSC responded to an inquiry from the NASD concerning compliance by FSC with the provisions of MSRB Rule G-36 relating to the timing and manner of mailing Official Statements. It was reported that, in certain instances, FSC had mailed copies of Official Statements to the NASD by regular mail, rather than by registered or certified mail; and in certain instances FSC did not mail the Official Statements within the time permitted due to a misinterpretation of the rule relating to the date from which the time period commences. FSC proposed to the NASD a Letter of Acceptance, Waiver and Consent with respect to these matters, which was accepted on December 15, 1997. Previously, in July of 1997, FSC had already implemented new internal procedures designed to address the problems associated with the foregoing matters. In June of 1998, FSC responded to a further inquiry from the NASD concerning compliance by FSC with the provisions of MSRB Rule G-36 relating to one additional instance whereby it was claimed that the copy of the Official Statement was not mailed by FSC within the time prescribed. Subsequent to the filing of the response by FSC, no further communication has been received from the NASD regarding the matter.

In January, 1998, FSC first responded to an inquiry from the NASD concerning the manner in which defeasance escrows were handled in various advance refunding bond issues. Eventually, over the course of two years, the NASD reviewed information concerning approximately 180 advance refunding issues wherein FSC had acted as the investment provider in purchasing securities for defeasance escrows during the period from 1990 through 1996. At the conclusion of their review, the NASD reported that, in one advance refunding transaction wherein FSC acted as an underwriter (the "Subject Transaction"), FSC had failed to disclose to the issuer of the municipal bonds that FSC would retain "positive carry" which it earned in connection with the funding of the defeasance escrow. "Positive carry" may result when an investment provider purchases securities for the escrow and then holds such securities pending the closing of the refunding issue if the interest earnings from the securities during the holding period exceed the financing costs incurred by the provider.

The NASD took the position that FSC's failure to disclose that it would retain positive carry in a single 1993 transaction constituted a technical violation of Section 17(a)(2) of the Securities Act of 1933 (the "Act"), even though the issuer was represented throughout the Subject Transaction by its own financial advisor, a third party financial institution which actively participated in the development of the escrow by selecting the securities to be purchased by FSC and approving the purchase prices to be paid. There were no allegations or charges that FSC willfully violated the Act or was guilty of any intentional wrongdoing with respect thereto.

Without admitting any liability, FSC proposed to the NASD a Letter of Acceptance, Waiver and Consent with respect to this matter which was accepted on April 19, 2000. Under the terms of the settlement, FSC agreed to pay the sum of \$59,697 to the NASD and accept a censure.

In April 2000, FSC was joined as a defendant in a lawsuit in Starr County, Texas, by Rio Grande City Consolidated Independent School District and Rio Grande City Public Facilities Corporation in connection with a lease revenue bond offering in 1995 in which FSC acted, nominally, as a co-manager in the underwriting of the bonds. There were no specific allegations of wrongdoing by FSC, but it was alleged that the managing underwriter represented that a lower interest rate would be obtained than that which was ultimately attributed to the bonds when issued. FSC replied in the suit, denying the claims as same relate to FSC, and filed for removal of the case to federal court. The trial for the case began on January 6, 2003, and was dismissed on January 8, 2003 with a directed verdict entered in favor of FSC and the other defendant in the case. The plaintiff appealed the decision, but the District Court's decision was affirmed by the Court of Appeals on April 14, 2004. The time in which to seek an appeal with the Texas Supreme Court has not yet expired.

In 2001, Brownsville Independent School District instituted an action in state court in Brownsville, Texas based on a claim that FSC, as financial advisor to the school district, acted to convince the district of a need for trips to New York to meet with ratings agencies in connection with certain bond offerings when, according to the district's allegations, the trips were unnecessary. The district claimed to have incurred travel expenses in an amount approximating \$65,000 for the three trips which they sought to recover from FSC. FSC filed an answer denying the claim and a counterclaim seeking to recover additional costs for the ratings trips for which FSC had not been reimbursed. The case was settled amicably with the school district agreeing to pay to FSC a portion of its unreimbursed expenses as sought in the counterclaim.

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

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(1) the identity of any individual	who would be a pa	arty to the discretional	y contract:
Cullen / Frost Bank	kers, Inc. sh	areholders.	
(2) the identity of any business en	tity ¹ that would be	e a party to the discret	ionary contract:
Same as above.			
and the name of:			
(A) any individual or business	entity that would b	oe a <i>subcontractor</i> on	the discretionary contract;
Cullen / Frost Bank in the attached for			sidiaries as listed
	•		
and the name of:			
(B) any individual or business entity, of any individual or			a parent or subsidiary business the discretionary contract;
None.	***************************************		
			an ann an

A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any lobbyist or discretionary contract being sought discretionary contract.	public relation by any inc	ations Firm employed dividual or business enti	for poty	urposes relating to the would be a party to the
None.				
Political Contributions Any individual or business entity see connection with a proposal for a discr dollars (\$100) or more within the past to or former member of City Council, any that contributes to City Council election disclosed under (1), (2) or (3) above. In to, contributions made by the indivi- contributions by an entity include, but a attorneys, or registered lobbyists of the	etionary co wenty-four candidate ons, by any ndirect con idual's sp re not limit	ontract all political cont (24) months made direct for City Council, or to individual or business tributions by an individ- ouse, whether statutor	ribution of the control of the contr	ns totaling one hundred indirectly to any current olitical action committee whose identity must be lude, but are not limited common-law. Indirect
To Whom Made:		Amount:	Date	of Contribution:
None since the incepti the Capital Markets Di				
Disclosures in Proposals Any individual or business entity seekin facts which, reasonably understood, rail violate Section 1 of Part B, Improper E discretionary contract.	se a questi	on2 as to whether any c	ity offi	cial or employee would
Signature:	Title: In	vestment Officer		Date: 8-18-2004
Degay W. Eal	Compan			

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1. Have you or any member of your Firm or Team to be assigned to this engagement ever been indicted or convicted of a felony or misdemeanor greater than a Class C in the last five (5) vears?

Circle One

YES



2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One

YES



3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One

YES



If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: Frost National Bank

Signature of Principal:

Tim M Cormick

Printed Name of Principal:

Vice President

Title of Principal

Rev. 5/31/02

City of San Antonio

Discretionary Contracts Disclosure*

For use of this form, see City of San Antonio Ethics Code, Part D. Sections 1&2 Attach additional sheets if space provided is not sufficient. State "Not Applicable" for questions that do not apply.

This form is required to be supplemented in the event there is any change in the information under (1), (2), or (3) below, before the discretionary contract is the subject of conneil action, and no later than five (5) business days after any change about which information is required to be filed.

Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

** Although Great Pacific is applying to become an approved broker/dealer for the City of San Antonio, and to, from time to time, provide brokerage services, we do not see this as a "Discretionary Contract." However, we have provided the following information for your convenience, and should our relationship be considered a "Discretionary Contract" according to the City of San Antonio's Ethic Code please feel free to use the following information where it applies.

(1) the identity of any in	idiyidaal who w	vilu be a party to th	discrenonary contract:
Christopher Vinck			
(2) the identity of any contract. Great Pacific Securities	business entity		Party and the Rescriptionary
and the name of:	:		

A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ividual or bush	dess-emity that	Would be a	Subcontractor on the
Not Applicable				
and the name of:				
sübsidia	vidual of busine prousinessenin the discretionary	y, of any individ	knovn to be a Mat or busines	partner, of a parent of Sentity who would be a
Not Applicable				
			o de la composición dela composición de la composición dela composición de la composición de la composición dela composición dela composición de la composición de la composición dela composición de la composición dela composición dela composición	
to the disere	of any <i>labovistic</i> ronary contract party to the discre	being sought by	any redividus	ed for purposes relating for business entity who
Not Applicable				a Waxa.
:				

Political Contributions

Any individual or business entity seeking a discretionary contract from the city must disclose in connection with a proposal for a discretionary contract, all political contributions totaling one fundred dolfars (IS 191), or more within the past owenty four (24) months made directly or indirectly on my currence for the past of City Council, any candidate for City Council of any past of any past of City Council any candidate for City Council of any past of the past of City Council elections by any individual or business entity whose deeply must be disclosed under (1)—(2) on (3) above indirect contributions by an entity include our are not limited to contributions made by an entity include by are not limited to contributions made by an entity include by are not limited to common law. Indirect contributions or an entity include by are not limited to

contributions made through the officers owners afformers of registered lobbyists of the entity.

Not Applicable, It is against Great Pacific's policies for the firm or any employee of the firm to make political contributions.

Disclosures in Proposals

Any individual or ousiness entire seeking a historelionary contract with the city shall disclose any known facts which teasonably understood raise a question as to whether any city official of employee would walke section for at B. Improper Economic Benefit, by participating in official action relating to the discretionary contract.

None		
Signature:	Title: Managing Director	Date:
Click	Company: Great Pacific Securities	August 19, 2004

For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1. Have you or any member ever been indicted or conv the last five (5) years?	•		_	
Check One	☐ YES		NO	
Have you or any member otherwise) from any work Federal, State or Local Go	being performed	for the City of		
Check One	☐ YES		NO	
3. Have you or any membe litigation with the City Government, or Private En	of San Antonio	or any other	Federal, St	and the second s
	YES		МО	
Check One				
Check One If you have answered "Ye name(s) of the person(s), information, indictment, con Any such information shoul and submitted with your pro-	the nature, and na	id the status ation, claim of	and/or out r litigation, a	come of the as applicable.
If you have answered "Ye name(s) of the person(s), information, indictment, cor Any such information should	the nature, and nviction, termined be provided of opposal.	nd the status ation, claim on n a separate p	and/or out r litigation, a age, attached	come of the as applicable. I to this form
If you have answered "Ye name(s) of the person(s), information, indictment, cor Any such information shoul and submitted with your pro	the nature, and nviction, termined be provided of oposal. NOWLEDGE, To	nd the status ation, claim on n a separate p	and/or out r litigation, a age, attached	come of the as applicable. I to this form
If you have answered "Yename(s) of the person(s), information, indictment, con Any such information should and submitted with your protection. TO THE BEST OF MY KIAND CORRECT.	the nature, and nviction, termined be provided of oposal. NOWLEDGE, To	nd the status ation, claim on n a separate p	and/or out r litigation, a age, attached	come of the as applicable. I to this form
If you have answered "Ye name(s) of the person(s), information, indictment, con Any such information should and submitted with your proof TO THE BEST OF MY KI AND CORRECT. Company Name: Great Pace	the nature, and nviction, termined be provided of oposal. NOWLEDGE, To	nd the status ation, claim on n a separate p	and/or out r litigation, a age, attached	come of the as applicable. I to this form
If you have answered "Yename(s) of the person(s), information, indictment, con Any such information should and submitted with your proof TO THE BEST OF MY KIAND CORRECT. Company Name: Great Paction Signature of Principal: Christopher Vinck	the nature, and nviction, termined be provided of oposal. NOWLEDGE, To	nd the status ation, claim on n a separate p	and/or out r litigation, a age, attached	come of the as applicable. I to this form

Rev. 5/31/02

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

* This form is required to be supplemented in the event there is any change in the information under (1), (2), or (3) below, before the discretionary contract is the subject of council action, and no later than five (5) business days after any change about which information is required to be filed.

Disclosure of Parties, Owners, and Closely Related Persons

NONE

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the ident	ity of any <u>indiv</u>	idual who woul	d be a par	ty to the discretion	ary conti	act:	
NONE	OTHER THAN	PRINCIPALS	OF INTE	CRCONTINENTAL	ASSET	MANAGEMENT	GROUP,
LTD.							
7 + 7 a							
(2) the identi	ity of any busin	ess entity ¹ that	would be	a party to the discr	etionary	contract:	
NONE O	THER THAN I	NTERCONTINE	NTAL AS	BET MANAGEMEN	NT GROU	IP, LTD.	erij Koloni Kolonik Kolonik
and the r	name of:						
(A) any i	ndividual or bus	siness entity tha	t would be	a subcontractor o	n the dis	cretionary contr	act;
NONE							
and the n	name of:				in the second se		

(B) any individual or business entity that is known to be a *partner*, or a *parent* or *subsidiary* business entity, of any individual or business entity who would be a party to the discretionary contract;

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any <i>lobbyist</i> or <i>public</i> r discretionary contract being sought by any discretionary contract.	elations Firm employed individual or business enti	for purposes relating to the ty who would be a party to the
		1 4 to 1 t
NONE		
NONE		
		<u> Santa anno an Aire de Santa anno an Aire an Aire ann an Aire an Aire an Aire an Aire an Aire an Aire an Aire</u> An Aire an Aire
Political Contributions		
Any individual or business entity seeking a	discretionary contract fr	om the city must disclose in
connection with a proposal for a discretionary	contract all political con	tributions totaling one hundred
dollars (\$100) or more within the past twenty-fe	our (24) months made dire	any political action committee
or former member of City Council, any candid that contributes to City Council elections, by	are for City Council, or to	entity whose identity must be
disclosed under (1), (2) or (3) above. Indirect of	contributions by an individ	hal include but are not limited
to, contributions made by the individual's	spouse whether statutor	ry or common-law. Indirect
contributions by an entity include, but are not li	mited to, contributions ma	de through the officers, owners,
attorneys, or registered lobbyists of the entity.		
attorneyo, or a egional configuration of the second of the		
To Whom Made:	Amount:	Date of Contribution:
		galage and the second of
	and the same of th	
NONE		
Disclosures in Proposals		
Disclosures in Proposals Any individual or business entity seeking a dis	cretionary contract with th	ne city shall disclose any known
Disclosures in Proposals Any individual or business entity seeking a disfacts which reasonably understood, raise a que	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a disfacts which reasonably understood, raise a que	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a disfacts which reasonably understood, raise a que	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi discretionary contract.	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi discretionary contract.	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi discretionary contract.	estion as to whether any	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi discretionary contract. NONE	estion ² as to whether any c Benefit, by participating	city official or employee would
Disclosures in Proposals Any individual or business entity seeking a dis facts which, reasonably understood, raise a quiviolate Section 1 of Part B, Improper Economi discretionary contract.	estion ² as to whether any c Benefit, by participating	in official action relating to the

OHN L. KAUTH

ASSET MANAGEMENT GROUP, LTD

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1.	Have you or any member of your Firm or Team to be assigned to this en	gagement ever been
	indicted or convicted of a felony or misdemeanor greater than a Class (C in the last five (5)
	years?	

Circle One YES XXX

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One YES

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One YES

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: INTERCONTINENTAL ASSET MANAGEMENT GROUP, LTD.

Signature of Principal:

Printed Name of Principal:

CHIEF EXECUTIVE OFFICER
Title of Principal

Rev. 5/31/02

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For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

• This form is required to be supplemented in the event there is any change in the information under (1), (2), or (3) below, before the discretionary contract is the subject of council action, and no later than five (5) business days after any change about which information is required to be filed.

Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any individual who would be a party to the discreti	onary contract:
Not Applicable	
(2) the identity of any business entity that would be a party to the dis	scretionary contract:
Not Applicable	
and the name of:	
(A) any individual or business entity that would be a subcontractor	or on the discretionary contract;
Not Applicable	
and the name of:	
(B) any individual or business entity that is known to be a partne, entity, of any individual or business entity who would be a pa	r, or a parent or subsidiary business rty to the discretionary contract;
Not Applicable	

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

en e		
Not Applicable		
connection with a proposal for a di- dollars (\$100) or more within the past or former member of City Council, a that contributes to City Council elec- disclosed under (1), (2) or (3) above to, contributions made by the in	scretionary contract all polits twenty-four (24) months many candidate for City Counctions, by any individual or e. Indirect contributions by andividual's spouse, whether ut are not limited to, contribu	ntract from the city must disclose it tical contributions totaling one hundre hade directly or indirectly to any currenticil, or to any political action committee business entity whose identity must be in individual include, but are not limited statutory or common-law. Indirections made through the officers, owner
To Whom Made:	Amount:	Date of Contribution:
Not Applicable		
		보이네 - 그는 휴세계에 된다
facts which, reasonably understood,	raise a question as to whet	ct with the city shall disclose any know ther any city official or employee wou icipating in official action relating to t
Not Applicable		
Not Applicable Signature:	Title: Associate	Date:
	Title: Associate Company:	Date:

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1. Have you or any member of indicted or convicted of a years?	of your Firm or T felony or misden	eam to be assigned to this engagement ever been neanor greater than a Class C in the last five (5)
Circle One	YES	NO
2. Have you or any member from any work being performant. Local Government, or Priv	ormed for the Ci	Team been terminated (for cause or otherwise) ty of San Antonio or any other Federal, State or
Circle One	YES	<u>NO</u>
3. Have you or any member of the City of San Antonio of during the last ten (10) years.	r any other Fede	Team been involved in any claim or litigation with ral, State or Local Government, or Private Entity
Circle One	YES	<u>NO</u>
the person(s), the nature, a conviction, termination, clai	nd the status ar m or litigation, :	above questions, please indicate the name(s) of ind/or outcome of the information, indictment, as applicable. Any such information should be a form and submitted with your proposal.
TO THE BEST OF MY KI CORRECT.	NOWLEDGE, T	THE ABOVE INFORMATION IS TRUE AND
Company Name: JPMorgan	Securities,	Inc. (1006)
Signature of Principal:		Signature of Representative
Thomas J. Maciula		Terri B. Clouse
Printed Name of Principal:		Printed Name of Representative
Managing Director		Associate
Title of Principal		Title of Representative

For use of this form, see City of Sen Antonio Ethics Code, Part D, Sections 182 Attach additional sheets if space provided is not sufficient.

State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any individual who would be	a party to the discretionary contract:
NA	
(2) the identity of any business entity that would	d be a party to the discretionary contract:
NA	
and the name of:	
(A) any individual or business entity that wo	ald be a subcontractor on the discretionary contract;
NA	
and the name of: (B) any individual or business entity that is keep entity, of any individual or business entity.	nown to be a partner, or a parent or subsidiary business who would be a party to the discretionary contract;
NA	
•	

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any lobbyist or public relations Firm employed for purposes relating to the discretionary contract being sought by any individual or business entity who would be a party to the discretionary contract.

Political Contributions

Any individual or business entity seeking a discretionary contract from the city must disclose in connection with a proposal for a discretionary contract all political contributions totaling one hundred dollars (\$100) or more within the past twenty-four (24) months made directly or indirectly to any current or former member of City Council, any candidate for City Council, or to any political action committee that contributes to City Council elections, by any individual or business entity whose identity must be disclosed under (1), (2) or (3) above. Indirect contributions by an individual include, but are not limited to, contributions by an entity include, but are not limited to, contributions by an entity include, but are not limited to, contributions made through the officers, owners, afterneys, or registered lobbyists of the entity.

To Whom Made:	Amount:	Date of Contribution:
	7"	

Disclosures in Proposals

Any individual or business entity seeking a discretionary contract with the city shall disclose any known facts which, reasonably understood, raise a question² as to whether any city official or employee would violate Section 1 of Part B, Improper Economic Benefit, by participating in official action relating to the discretionary contract.

Signature: 5	Title: Managing Dunoster Date:
John Lover	Company: LOOP CAPITAL MARILETS
[/]	MARILETS

For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

	indicted or convicted years?	of a felony of	or misdeme	anor greate	r than a Class C in	n the last five (5)
	Circle One	Y	/ES	N	0)	
2.	Have you or any me from any work being Local Government, or	performed f	or the City			
	Circle One		YES	N	0)	
3.	Have you or any men the City of San Anto during the last ten (10	nio or any ot				
	Circle One	ar eff	YES	N	0	
	you have answered " e person(s), the natu	•				
co	nviction, termination ovided on a separate	, claim or lit	igation, as	applicable.	Any such inform	nation should be
pr TC	nviction, termination ovided on a separate O THE BEST OF MORRECT.	, claim or lit page, attacho Y KNOWLE	igation, as ed to this for EDGE, THE	applicable. orm and su E ABOVE	Any such inform bmitted with your	nation should be r proposal.
pr TC	nviction, termination ovided on a separate O THE BEST OF MORRECT.	, claim or lit page, attacho Y KNOWLE	igation, as ed to this for EDGE, THE	applicable. orm and su E ABOVE	Any such inform bmitted with your	nation should be r proposal.
pr TC CC	nviction, termination ovided on a separate O THE BEST OF M	, claim or lit page, attacho Y KNOWLE	igation, as ed to this for EDGE, THE	applicable. orm and su E ABOVE	Any such inform bmitted with your	nation should be r proposal.
pr TC CC Co	nviction, termination ovided on a separate O THE BEST OF MORRECT. Ompany Name: Loop	, claim or lit page, attache Y KNOWLE Capital	igation, as ed to this for EDGE, THE	applicable. orm and su E ABOVE	Any such inform bmitted with your	nation should be r proposal.
Cooper TCC CCC Ccc Sign	nviction, termination ovided on a separate O THE BEST OF MORRECT. Ompany Name: Loop And	, claim or lit page, attache Y KNOWLE Capital	igation, as ed to this for EDGE, THE	applicable. orm and su E ABOVE	Any such inform bmitted with your	nation should be r proposal.

Rev. 5/31/02

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any int	lividual who would be a	party to the discretion	nary contract:	
MERZILL	_ Lyncu			
(2) the identity of any bin	-	be a party to the disci	retionary contract:	
NA				
and the name of:			in day and sold	
(A) any individual or	business entity that would	i be a subcontractor	on the discretionary contract;	
N/A				
and the name of:	Agent when I was I triggelye / 1 (1 minute)			-
(B) any individual or entity, of any initi	business entity that is knowledged or business entity	own to be a <i>partner</i> , who would be a party	or a parent or subsidiary busing to the discretionary contract;	ess
NA				

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

discretionary contain	ndividual or business entit	for purposes relating to the ty who would be a party to the
Political Contributions Any individual of business entity seeking a	discretionary contract from	om the city must disclose in
connection with a proposal for a discretionary dollars (\$100) or more within the past twenty for a former member of City Council, any candidathat contributes to City Council elections, by a disclosed under (1), (1) or (3) above. Indirect contributions made by the individual's contributions by an entity include, but are not limattorneys, or registered lebbyists of the entity.	our (24) months made director for City Council, or to my individual or business contributions by an individual spouse, whether statutor mited to contributions may	ctly or indirectly to any current any political action committee entity whose identity must be lual include, but are not limited by or common-law. Indirect de through the officers, owners,
To Whom Made:	Amount:	Date of Contribution:
w/A		
Disclosures in Proposals Any individual or business entity seeking a disc	cretionary contract with th	le city shall disclose any known
facts which, reasonat y understood, raise a que violate Section 1 of Fart B, Improper Economic discretionary contract.	estion as to whether any c Benefit, by participating	city official of employee would
facts which, reasonably understood, raise a que violate Section 1 of Fart B, Improper Economic	estion as to whether any c Benefit, by participating	in official action relating to the

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

		•		ed to this engagement ever been an a Class C in the last five (5)
years?	N/A			
Circle One		YES	NO	
2 77		C Til	an Taine Lare same	

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One	YES YES	NO	

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One NO

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: MERRILL Lysicus

Signature of Principal:

Diare McGuire

Printed Name of Principal:

Administrative Manager

Title of Principal

Rev. 5/31/02

INFORMATION REDUCED FOR THIS

APPRICAMENT WOMED BE DISPLED AND THE ENCLOSED AND ITEM ANNUAL

REPORT, ANY MATERIAL LITICATION,

ARBITMATION ON RETULDEDAY

PROCEEDINGS, WITTHE LIST

SYRS WOULD HAVE BEEN DISCUSSED

IN THE MERRILL LYNCH, ENCL

FINANCIAL STATEMENTS AS RETURNED

TO BE FLED FOR EACH OF THE LAST

FIVE YAS WITH THE SEC.

Attachments:

The Attachments requesting additional information regarding Attachment II,III.IV & V do not apply to Merrill Lynch. Being a Broker/Dealer, Merrill Lynch is subject to federal securities laws and a host of exchange rules and government regulations whose primary purpose is investor protection. Furthermore, information requested in Attachment III – Litigation Disclosure would be disclosed in the enclosed audited annual report. Any material litigation, arbitration or regulatory proceedings within the last (5) years would have been disclosed in the Merrill Lynch, Inc. financial statements as required to be filed for each of the last five (5) years with the Securities Exchange Commission.

Jed-Ellet

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets is space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

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	any <u>individual</u> who v	would be a party	to the discretion	ary contract:
Not Applicable	***			
				그는 경기 가는 생각살 화작을 하는 것이다.
(2) the identity of	any <u>business entity</u> ¹	that would be a	party to the discr	retionary contract:
Not Applicable				
a nd the name of		111	7	
	or business entity th	at would be a su	bcontractor on the	ne discretionary contract;
Not Applicable				
Income and the second s				
(B) any individual any individual or b	l or business entity th ousiness entity who w	at is known to b yould be party to	e a <i>partner</i> , or a positive the discretionary	parent or subsidiary business entitity, of y contract;
Not Applicable				24.415.
			and the second s	the second secon

¹A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

		poses relating to the discretionary rty to the discretionary contract.
Not Applicable	 	
		<u> </u>

Political Contributions

Any individual or business entity seeking a discretionary contract from the city must disclose in connection with a proposal for a discretionary contract all political contributions totaling one hundred dollars (\$100) or more within the past twenty-four (24) months made directly or indirectly to any *current* or *former member* of City Council, any *candidate* for City Council, or to any *political action committee* that contributes to City Council elections, by any individual or business entity whose identity must be disclosed under (1), (2) or (3) above. Indirect contributions by an individual include, but are not limited to, contributions made by the individual's spouse, whether statutory or common-law. Indirect contributions by an entity include, but are not limited to, contributions made through the officers, owners, attorneys, or registered lobbyists of the entity.

To Whom Made:	Amount:	Date of Contribution:
Not Applicable		44

Disclosures in Proposals

Any individual or business entity seeking a discretionary contract with the city shall disclose any known facts which, reasonably understood, raise a question ² as to whether any city official or employee would violate Section 1 of Part B, Improper Economic Benefit, by participating in official action relating to the discretionary contract

contract.	·	
Not applicable		
Signature:	Title: Managing Director / Branch Manager / Principal Company: Morgan Keegan & Co., Inc.	Date: August 19, 2004
Richard K. Fellows		

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

form may result in the disquant contract, once awarded.	, and the second				
					1
Have you or any member of you convicted of a felony or misder	ur Firm or Tear neanor greater	n to be assigned to than a Class C in th	this engagement le last five (5) ye	t ever been indicted ears?	a or
	YES		(NO)		work
2. Have you or any member of you being performed for the City o	our Firm or Tea f San Antonio (m been terminated or any other Federa	(for cause of old l, State, or Loca	l Government, or F	Private
Entity?	YES		NO		
Circle One	YES			mi de aloir	n against
Circle One 3. Have you or any member of y the City of San Antonio or an ten (10) years?	our Firm or Te y other Federal	am been involved to State, or Local Go	overnment, or Pr	ivate Entity during	the last
Circle One	YES			(a) of the ne	rson(s).
If you have answered "YES" to the nature, and the status and/o or litigation, as applicable. An form and submitted with your	y such informa	ation should be pr	ovided on a sep	arate page, acmo-	
TO THE BEST OF MY KNOW	FDGE THE	ABOVE INFORM.	ATION IS TRU	E AND CORREC	1.
TO THE BEST OF MY KNOW	EDD 02,				
Company Name: Morga	n Keegan & C	o., Inc.			
Land one					
Signature of Principal					
Richard K. Fellows					
Printed Name of Principal					
Managing Director/Branch M	Manager				

Title of Principal

City of San Antonio Discretionary Contracts Disclosure* For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2 Attach additional sheets if space provided is not sufficient. State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

For the purpose of assisting the City in the enforcement of provisions contained in the City Charter and the Code of Ethics, an individual or business entity seeking a discretionary contract from the City is required to disclose in connection with a proposal for a discretionary contract:

(1) the identity of any individual who would be a pa	rty to the discretionary contract:	
	N/A	
(2) the identity of any business entity ¹ that would be	e a party to the discretionary contract:	
	N/A	
and the name of: (A) any individual or business entity that would by	pe a <i>subcontractor</i> on the discretionary contrac	t;
	N/A	
and the name of: (B) any individual or business entity that is know entity, of any individual or business entity wl	vn to be a <i>partner</i> , or a <i>parent</i> or <i>subsidiary</i> bu ho would be a party to the discretionary contrac	
	N/A	

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

		and the state of t
(3) the identity of any <i>lobbyist</i> or <i>pu</i> discretionary contract being sought be discretionary contract.	ublic relations Firm emplo by any individual or business	eyed for purposes relating to the entity who would be a party to the
	N/A	T
Political Contributions		
Any individual or business entity seel connection with a proposal for a discrete dollars (\$100) or more within the past two or former member of City Council, any	tionary contract all political venty-four (24) months made	contributions totaling one hundred directly or indirectly to any <i>current</i>
that contributes to City Council election disclosed under (1), (2) or (3) above. In to, contributions made by the indivi	ns, by any individual or bus direct contributions by an in-	iness entity whose identity must be dividual include, but are not limited
contributions by an entity include, but ar attorneys, or registered lobbyists of the e	e not limited to, contribution	s made through the officers, owners,
To Whom Made:	Amount:	Date of Contribution:
$\sim 10^{-1}$		
NA		
NA		
NA		
Disclosures in Proposals Any individual or business entity seeking facts which, reasonably understood, raise violate Section 1 of Part B, Improper Ediscretionary contract	se a question as to whether	any city official or employee would
Any individual or business entity seeking facts which, reasonably understood, raise	se a question as to whether	any city official or employee would
Any individual or business entity seekin facts which, reasonably understood, rais violate Section 1 of Part B, Improper Ed	se a question as to whether	any city official or employee would
Any individual or business entity seekin facts which, reasonably understood, rais violate Section 1 of Part B, Improper Ed	se a question as to whether	any city official or employee would
Any individual or business entity seekin facts which, reasonably understood, rais violate Section 1 of Part B, Improper Ed	se a question as to whether	any city official or employee would
Any individual or business entity seekin facts which, reasonably understood, rais violate Section 1 of Part B, Improper Ed	se a question ² as to whether conomic Benefit, by participal street of the second street of	any city official or employee would ating in official action relating to the esident Date:
Any individual or business entity seekin facts which, reasonably understood, rais violate Section 1 of Part B, Improper Eddiscretionary contract.	se a question ² as to whether conomic Benefit, by participal street of the second street of	any city official or employee would ating in official action relating to the

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1. Have you or any member of your Firm or Team to be assigned to this engagement ever been indicted or convicted of a felony or misdemeanor greater than a Class C in the last five (5)	
The Spears?	
Circle One YES (NO)	
2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?	
Circle One YES NO	
3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?	
Circle One YES NO	
그렇다 보다 그 그 그 그 그 그 그 그는 그 그 그 그 그 그 그 그 그 그 그	
If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.	
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the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal. TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND	// // // // // // // // // // // // //
the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal. TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT. Company Name: Fryor Doley Securities, adjustice of Doley Securities, I Carol L. Mackoff Signature of Principal:	- NC
the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal. TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT. Company Name: Fryor Doley Securities, adjunctor of Doley Securities, I Carol Signature of Principal: CAROL L. MACKOFF Printed Name of Principal:	
the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal. TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT. Company Name: Pryor Doley Securities, adjustion of Doley Securities, I Carel S. Mackoff Signature of Principal: CAROL L. MACKOFF Printed Name of Principal: Senior Vice President	
the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal. TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT. Company Name: Fryor Doley Securities, adjustice of Doley Securities, I Carol L. Mackoff Signature of Principal:	

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
Attach additional sheets if space provided is not sufficient.
State "Not Applicable" for questions that do not apply.

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Disclosure of Parties, Owners, and Closely Related Persons

(1) the iden	tity of any individu :	ıl who would be a	a party to the	discretionary co	ontract:	
NA						
(2) the iden	tity of any business	entity ¹ that would	d be a party to	the discretiona	ary contract:	
NA						
	name of:	ss entity that wou	ld be a <i>subco</i>	ntractor on the	discretionary contra	ıct;
NA						
(B) any	name of: individual or busine y, of any individual					
NA	y, or any marviduar	or ousiness entry	who would t	c a party to the	discretionary contr	act,

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any <i>lobbyist</i> or discretionary contract being sough discretionary contract.	public rela	ntions Firm employed lividual or business enti	for purposes relating to the ty who would be a party to the
NA NA	1.1		
Political Contributions Any individual or business entity s connection with a proposal for a disc dollars (\$100) or more within the past or <i>former member</i> of City Council, ar that contributes to City Council elect disclosed under (1), (2) or (3) above. to, contributions made by the ind contributions by an entity include, but attorneys, or registered lobbyists of the	twenty-four twenty-four y candidate ions, by any Indirect contividual's speare not limit	ontract all political cont (24) months made direct for City Council, or to individual or business tributions by an individuouse, whether statutor	tributions totaling one hundred ctly or indirectly to any current any political action committee entity whose identity must be lual include, but are not limited by or common-law. Indirect
To Whom Made:		Amount:	Date of Contribution:
NA A			
Disclosures in Proposals Any individual or business entity seel facts which, reasonably understood, reviolate Section 1 of Part B, Improper discretionary contract.	aise a questi	on ² as to whether any of	city official or employee would
NA			
Signature:	G Compan	ice President eneral Princip y: Raymond & Associates,	al 8/17/04

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1.	Have you or any member of your	Firm or Team to	be assigned to	this engagement ever been
	indicted or convicted of a felony	or misdemeanor	greater than a	Class C in the last five (5)
	years?			

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One YES NO

YES

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One YES NO

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Name: Raymond James & Associates, Inc.

Signature of Principal:

John J.Walsh

Printed Name of Principal:

Circle One

<u>Vice President - General Principal</u> Title of Principal

To the best of our knowledge, Raymond James & Associates, Inc.'s ("Raymond James") Public Finance Department, in its role as Underwriter or Financial Advisor, is not currently in material violation of any rules and regulations in Texas or nationally. Raymond James is not subject to any material litigation or proceeding which relates to our public finance professional activities. This statement of assurance relates to the regulations promulgated by the United States Securities and Exchange Commission, the New York Stock Exchange, Inc., the National Association of Securities Dealers, Inc., and the Municipal Securities Rulemaking Board.

On January 11, 1999, the SEC brought an action against almost all of the major NASDAQ market makers in connection with their 1994 market making activities. The commission alleged that in 1994 market makers, including Raymond James, violated provisions of the federal securities laws in connection with their market making activities in NASDAQ securities. Without admitting or denying the allegations, Raymond James agreed to pay a civil penalty of \$400,000 and disgorgement of \$7,431 to settle the matter. In addition, it agreed to a cease and desist order and to submit certain of its policies to an independent consultant.

In March 2000, Raymond James participated in an industry-wide settlement pertaining to the pricing methods employed throughout the industry in connection with certain advance refunding transactions that took place between 1990 and 1996. Without admitting or denying the allegations, Raymond James agreed to pay approximately \$3.6 million of the more than \$172 million paid by 21 firms in order to eliminate any threat by the IRS that certain bonds relating to those transactions could lose their tax-exempt status.

On June 19, 2000, the United States District Court for the Eastern District of Kentucky entered a judgment for approximately \$40 million against defendants in <u>Corporex Realty & Investment Corp. v. Raymond James & Associates, Inc. and RJ Mortgage Acceptance Corp.</u>, Case No. 98-14, which was settled on appeal.

In April 2001, Raymond James along with fifteen other securities firm defendants, settled a state court proceeding in Collier County, Florida in connection with escrow pricing for certain advance refunding transactions for municipalities. Raymond James contributed a small portion of the total settlement of \$4,507,000.

Raymond James and its affiliates employ or are associated with over 5,200 brokers who handle customer accounts, and engage in a full range of securities-related business. As a result of its size and in line with other full service firms in our industry, Raymond James has been involved in a modest number of lawsuits and arbitrations. These other claims involve activities that are unrelated to Raymond James' public finance underwriting activities.

sananton04

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Disclosure of Parties, Owners, and Closely Related Persons

(1) the identity of	f any <u>individual</u> wh	o would be a par	ty to the discretion	nary contract	
None					
(2) the identity of	f any <u>business entit</u>	$\mathbf{\underline{v}}^1$ that would be	a party to the disc	retionary con	tract:
None					
and the name	of:				es lije og e
(A) any indiv	idual or business en	tity that would be	a subcontractor	on the discre	tionary contract;
None					
					r subsidiary business
Nône					

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

3) the identity of any <i>lobbyist</i> or <i>publi</i> discretionary contract being sought by a discretionary contract.	ic relation any individ	ns Firm employed I dual or business entity	who wo	uld be a party to the
None				
Political Contributions Any individual or business entity seeking connection with a proposal for a discretical dollars (\$100) or more within the past twent or former member of City Council, any can that contributes to City Council elections disclosed under (1), (2) or (3) above. Indicate, contributions made by the individual contributions by an entity include, but are attorneys, or registered lobbyists of the entity	nty-four (2 andidate for by any interest contributed in the contribute	(4) months made director City Council, or to ndividual or business butions by an individual or business butions are business.	any politi entity w	directly to any current fical action committee those identity must be de, but are not limited forman-law. Indirect
To Whom Made:		Amount:	Date of	Contribution:
None				
Disclosures in Proposals Any individual or business entity seeking facts which, reasonably understood, raise violate Section 1 of Part B, Improper Ec discretionary contract.	g a discret e a questio onomic Be	ionary contract with the conference of the confe	he city she city office	nall disclose any knov cial or employee wou ial action relating to t
None				
Signature:	Title: \	1ce president		Date:
Allina .	Compan	y: Seattle-North	west	7-29-04

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

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1. Have you or any member of your Firm or Team to be assigned to this engagement ever been

indicted or convi years?	cted of a felony or misd	emeanor greater than a (Class C in the last five (5)
Circle One	YES	NO	
from any work b	member of your Firm eing performed for the ont, or Private Entity?	or Team been terminated City of San Antonio or a	d (for cause or otherwise) any other Federal, State or
Circle One	YES	NO	
	Antonio or any other Fed		any claim or litigation with ernment, or Private Entity
Circle One	YES	NO	
the person(s), the n conviction, terminat	ature, and the status a	and/or outcome of the as applicable. Any suc	e indicate the name(s) of information, indictment, the information should be with your proposal.
TO THE BEST OF CORRECT.	MY KNOWLEDGE,	THE ABOVE INFORM	MATION IS TRUE AND
Company Name: S Signature of Principa	eattle-Northwest Las	<u>Securities</u> Corr	
Traci L. Sa Printed Name of Printed Vice Presiden	cipal:		
Title of Principal			

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Disclosure of Parties, Owners, and Closely Related Persons

(1) the identity of any individual who would be a	a party to the discretionary co	ontract:
Not Applicable		
(2) the identity of any business entity that would	d be a party to the discretion	ary contract:
Not Applicable		
and the name of:		Jakan ka
(A) any individual or business entity that wou	ld be a subcontractor on the	discretionary contract;
Not Applicable		
and the name of:		
(B) any individual or business entity that is kr entity, of any individual or business entity		
Not Applicable		

A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any lobbyist or public relations Firm employed for purposes relating to the discretionary contract being sought by any individual or business entity who would be a party to the discretionary contract.

Not Applicable

Political Contributions

Any individual or business entity seeking a discretionary contract from the city must disclose in connection with a proposal for a discretionary contract all political contributions totaling one hundred dollars (\$100) or more within the past twenty-four (24) months made directly or indirectly to any current or former member of City Council, any candidate for City Council, or to any political action committee that contributes to City Council elections, by any individual or business entity whose identity must be disclosed under (1), (2) or (3) above. Indirect contributions by an individual include, but are not limited to, contributions by an entity include, but are not limited to, contributions made through the officers, owners, attorneys, or registered lobbyists of the entity.

To Who	om Made:	ŕ	Am	ount:	Date of Contribution:
	V, f	Applicabl	4		
*	•				

Disclosures in Proposals

Any individual or business entity seeking a discretionary contract with the city shall disclose any known facts which, reasonably understood, raise a question² as to whether any city official or employee would violate Section 1 of Part B, Improper Economic Benefit, by participating in official action relating to the discretionary contract.

Signature:

Title: Vice Prisident Date: 8/13/04

Fold Michael Company:

Southwest Securiters Le

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1.	•	•	•		this engagement Class C in the la	
	years?					
	Circle One		YES	(NO)		

2. Have you or any member of your Firm or Team been terminated (for cause or otherwise) from any work being performed for the City of San Antonio or any other Federal, State or Local Government, or Private Entity?

Circle One YES NO

3. Have you or any member of your Firm or Team been involved in any claim or litigation with the City of San Antonio or any other Federal, State or Local Government, or Private Entity during the last ten (10) years?

Circle One YES NO

If you have answered "Yes" to any of the above questions, please indicate the name(s) of the person(s), the nature, and the status and/or outcome of the information, indictment, conviction, termination, claim or litigation, as applicable. Any such information should be provided on a separate page, attached to this form and submitted with your proposal.

TO THE BEST OF MY KNOWLEDGE, THE ABOVE INFORMATION IS TRUE AND CORRECT.

Company Southwest Securities, Inc.

Signature of Principal:

Henry F. Coble
Printed Name of Principal:

Director Fixed Income Regulatory Oversight
Title of Principal

Disclosure of Parties, Owners, and Closely Related Persons

City of San Antonio Discretionary Contracts Disclosure* For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2

For use of this form, see City of San Antonio Ethics Code, Part D, Sections 1&2
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(1) the identity of any individual who would be a party to the discretionary contract:

(2) the identity of any business entity! that would be a party to the discretionary contract:

and the name of:

(A) any individual or business entity that would be a subcontractor on the discretionary contract;

and the name of:

(B) any individual or business entity that is known to be a partner, or a parent or subsidiary business entity, of any individual or business entity who would be a party to the discretionary contract:

NA

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any lobbyish or public relations from completed for purposes relating to the discretionary contract being sought by any individual or business entity who would be a party to the discretionary contract.

Political Contributions

Any individual or business entity seeking a dispertionary contract from the city must disclose in connection with a proposal for a discretionary contract all political contributions totaling one hundred dollars (\$100) or more within the past twenty four (24) months unde directly or indistrictly to any contract of former member of City Council, any candidate for City Council, or to any political action committee that contributes to City Council elections, by any individual or business entity whose identity must be disclosed under (1), (2) or (3) above, indirect contributions by an individual include, but are not limited to, contributions made by the individual's spouse, whether standary or common-law. Indirect contributions by an early include our are not limited to, contributions made through the officers, owners, afterness, or registered lobbyiets of the entity.

7	To Whom Made:	Amount:	Date of Contribution:
	talen er en	()	
	#**		
.	\mathcal{M}	en e	
	where $[P_{ij}]$, P_{ij} , P_{ij}		
L.			grand garaged (digital and all

Dischauros in Proposals

Any individual or business entity seeking a discretionary contrast with the city shall disclose any known facts. Which, reasonably understood, raise a question as to whicher any city official or employee would violan Solution is of Part B. Improper Economic Sensiti, by participating to official action relating to the discretiment contract.

	NB	
Signature:	Title:	Date:
Butt Fourth	Company: Wello Forgo Brokrage	814/04
	SERYICES L.L.C.	

^{*} For purposes of this rule, facts are "reasonably understood" to "ruise a question" about the appropriatories of official action if a disintarcated person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation

Disclosure form may result termination of the contract,		ation of your proposal f	rom consideration or
Have you or any member indicted or convicted of a years?			
Circle One	YES	NO	
2. Have you or any member from any work being period Local Government, or Private Control of the	formed for the City	Team been terminated (f y of San Antonio or any	or cause or otherwise) other Federal, State or
Circle One	YES	NO	
3. Have you or any member the City of San Antonio oduring the last ten (10) year	r any other Federa		
Circle One	YES	NO	
If you have answered "Yes' the person(s), the nature, a conviction, termination, clai provided on a separate page	nd the status and m or litigation, as	l/or outcome of the info applicable. Any such i	ormation, indictment, information should be
TO THE BEST OF MY KI CORRECT.			The Market of the Control of the Con
Company Name: WELLS F	Albo Broke	nder Service	SL.L.C.
Signature of Principal:			
Scott Burgerton			
Printed Name of Principal:			
Title of Principal			



Discretionary Contracts Disclosure*

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Attach additional sheets if space provided is not sufficient.

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(1) the identity of any individual who would be a ba	arty to the discretionary contract:
(2) the identity of any <u>business entity</u> that would be	e a party to the discretionary contract:
and the name of: (A) any individual or business entity that would	be a subcontractor on the discretionary contract;
and the name of:	
(B) any individual or business entity that is known entity, of any individual or business entity was a second or business.	who to be a partner, or a parent or subsidiary business the would be a party to the discretionary contract;

A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company, receivership, trust, unincorporated association, or any other entity recognized by law.

Not applicable

(3) the identity of any <i>lobbyist</i> or <i>p</i> discretionary contract being sought discretionary contract.			
Political Contributions Any individual or business entity see connection with a proposal for a discredible discount of the former member of City Council, any that contributes to City Council election disclosed under (1), (2) or (3) above. In to, contributions made by the individual contributions by an entity include, but a attorneys, or registered lobbyists of the elections.	etionary controventy-four 2 candidate for any indirect control idual's spour re not limited	ract all political cont 4) months made direct r City Council, or to adividual or business outions by an individuse, whether statutor	ributions totaling one hundred etly or indirectly to any current any political action committee entity whose identity must be ual include, but are not limited y or common-law. Indirect
To Whom Made:		Amount:	Date of Contribution:
Disclosures in Proposals Any individual or business entity seekir facts which, reasonably understood, rais violate Section 1 of Part B, Improper Ediscretionary contract.	se a question	² as to whether any c	ity official or employee would
Signature: C. Riehard Schwarz	Company:	rior Vice Presi	8/6/04

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

termination of the contract, on	c aviaraca.		
1. Have you or any member of indicted or convicted of a fe years?	your Firm or Tea lony or misdeme	am to be assigned to eanor greater than a	this engagement ever been Class C in the last five (5)
Circle One	YES	NO	
2. Have you or any member of from any work being perform Local Government, or Private	ned for the City		
Circle One	YES	NO	
3. Have you or any member of the City of San Antonio or a during the last ten (10) years?	ny other Federa		
Circle One	YES	NO	
If you have answered "Yes" to the person(s), the nature, and conviction, termination, claim provided on a separate page, at	the status and or litigation, as	or outcome of the applicable. Any su	e information, indictment, uch information should be
TO THE BEST OF MY KNC CORRECT.			MATION IS TRUE AND
Company Name: Zions F C. Richard Schwor Signature of Principal:	3	onal Dank	
C, Richard Schu Printed Name of Principal:			
Senior Vice Presi	dent		

For use of this form, see City of San Antonio Ethics Code, Part D. Sections 1&2
Attach additional sheets if space provided is not sufficient.
State Not Applicable for questions that do not apply.

* This form is required to be supplemented in the event there is any change in the information under (1). (2), or (3) below, before the discretionary contract is the subject of council action, and no later than five

(5) business days after any change about which information is required to be filed

Disclosure of Parties, Owners, and Closely Related Persons

(1) the identity of any individual who would be	a party to the discreti	onary contract:	
Not applicable			
(2) the identity of any business entity that woul	d he a patty to the disc	cretionary contract:	
Fidelity Investments Tax-Exempt Services (Company		
		en e	
and the name of:			
(A) any individual or business entity that would	be a subcontractor or	n the discretionary	contract;
Not applicable			
			A committee
and the name of:			
(B) any individual or business entity that is known entity, of any individual or business entity who			
Not applicable			
r r			g ki di ke Di anti di di dengan

¹ A business entity means a sole proprietorship, partnership, Firm, corporation, holding company, joint-stock company.

receivership, trust, unincorporated association, or any other entity recognized by law.

(3) the identity of any lobbyist or public relations Firm employed for purposes relating to the discretionary contract being sought by any individual or business entity who would be a party to the discretionary contract.

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Not applicable		
		1999年4月

Political Contributions

Any individual or business entity seeking a discretionary contract from t city must disclose in connection with a proposal for a discretionary contract all political contributions totaling one hundred dollars (S 100) or more within the past twenty—four (24) months made directly or in to any current or former member of City Council, any candidate for City Council, or to any political action committee that contributes to city Council elections, by any individual or business entity whose identity must be disclosed under (). (2) or (3) above. Indirect contributions by an individual include, hut are not limited to, contributions made by the individual's spouse, whether statutory or common—law, indirect contributions by an entity include, but are not limited to, contributions made through the officers, owners, attorneys, or registered lobbyists of the entity.

			and the respective and residence from the contract of the cont
To Whom Made: Not Applicable	Amount: Not Applicable	Date of Contribu Not Applicable	

Disclosures in Proposals

Any individual or business entity seeking a discretionary contract with the city shall disclose any known facts which, reasonably understood, raise a question" as to whether any city official or employee would violate Section I of Part 13. Improper Economic Benefit, by participating in official action relating to the discretionary contract.

·		
Signature: Hioryi Tynck	Title: Account Executive Company: Fidelity Investments Tax-Exempt Services Company	Date: August 18, 2004

² For purposes of this rule, facts are "reasonably understood" to "raise a question" about the appropriateness of official action if a disinterested person would conclude that the facts, if true, require recusal or require careful consideration of whether or not recusal is required.

Failure to fully and truthfully disclose the information required by this Litigation Disclosure form may result in the disqualification of your proposal from consideration or termination of the contract, once awarded.

1.	indicted or con Circle One	victed of a felo	ony or misdemeand NO	to be assigned to this or greater than a Class	s C III the fast i	
2.	Have you or an any work bein Government, or	g performed fo	or the City of San A	been terminated (for intonio or any other I	cause or other Federal, State o	rwisé) from or Local
	Circle One	□YES	∑NO			
3.	Have you or a City of San A last ten (10) yo	ntonio or any c	your Firm or Team other Federal, State	been involved in an or Local Governmen	y claim or litig nt, or Private E	ation with the nuity during the
	Circle One	YES	⊠NO "			
the nat litigati form a	ure, and the sta on, as applicabl nd submitted w HE BEST OF M	tus and/or outcle. Any such in ith your propo	formation should be sal. OGE, THE ABOVI	ons, please indicate thation, indictment, core provided on a sepa	rate page, attac	ched to this
Comp	any Name: <u>Fid</u>	elity Investme	ents Tax-Exempt	Services Company		
Signal	gest la contraction of Princips	ter year				
	aret McCoy d Name of Prin	cipal:				
<u>Direc</u> Title	of Principal					
Rev.	5/31/02					