



Business Trust Division

October 18<sup>th</sup> 2016

Borough of Franklin Park  
Attn: Ambrose Rocca  
2344 West Ingomar Road  
Pittsburgh PA 15237-1619

RE: Pennsylvania Act 44 Disclosure

Gentlemen:

This letter is being sent in response to your request for Charles Schwab Bank ("Schwab Bank"), to disclose certain information required under the Pennsylvania Act 44 of 2009 associated with Schwab Bank's provision of professional services to the Franklin Borough ("Franklin") with respect to the Borough of Franklin Park Employees' Pension Plan (A/C # 520030) and Borough of Franklin Park Police Pension Plan (A/C # 520029) (collectively, the "Plans")

This letter is being sent in lieu of completing the disclosure form provided to Schwab Bank in order to provide additional explanation regarding several of the disclosures.

Schwab Bank hereby provides the following information:

1. Names and titles of all individuals providing professional services to the Plans

Rudy Digiorgio	Client Service Manager
Judy Gayer	Sr. Manager, Client Services
Adolph Ojeda	Director, Trust Administration
Lisa D'Aniello	Director, Client Services
Clint Smith	Vice President, Operations
Deborah Pritchard	Vice President, Client Services
Jeffrey Morgan	Vice President, Product Management
Mark Coffrini	Senior Vice President

This list includes (i) the client services employees that work with the Plan sponsor and Schneider Downs Wealth Management Advisors, LP, the Plans' investment manager, on a daily basis coordinating the delivery of Schwab Bank's trust and custody services with respect to the plan, including account maintenance, cash movement, trade settlement, etc.; and (ii) the management team of Schwab Retirement Business Services, of which the client service team is a component..



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2. Names and titles of any Affiliated Entity and their Executive-level Employees with direct responsibility for policies relating to Schwab's Retirement Business Services:

The Charles Schwab Corporation	Charles R. Schwab, Chairman
The Charles Schwab Corporation	Walter Bettinger, President & CEO
Charles Schwab Bank	Paul Woolway, President
Charles Schwab & Co., Inc.	Bernie Clark, Executive

The Charles Schwab Corporation (collectively, with its subsidiary companies, "Schwab") provides products and services with respect to retirement plans and other employee benefit plans through its wholly owned subsidiaries and affiliates, Charles Schwab & Co., Inc. (Member SIPC) and Charles Schwab Bank.

3. Franklin Borough Employment

None of the above individuals is a current or former official or employee of Franklin Borough.

4. Employment as a Registered Federal or State Lobbyist

None of the above individuals or Affiliated Entities is currently or formerly registered as a Federal or State lobbyist.

5. Third Party Agents or Lobbyists Activity

None of the above individuals or Affiliated Entities has paid compensation to or employed any third party intermediary agent or lobbyist to communicate, directly or indirectly with any Franklin employee or official in connection with any transaction or investment involving Schwab or the Plans.

6. Solicitation of Contributions to Franklin Officers or Candidates for Office

To the best of our knowledge, neither Schwab nor any of the Affiliated Entities has solicited any contributions to a Franklin officer or any candidate for a Franklin municipal office.

7. Contributions to Franklin Officers or Candidates for Office

To the best of our knowledge, neither Schwab nor any of the Affiliated Entities has made any contributions to a Franklin officer or any candidate for Town municipal office.

8. Relationships with Franklin Officials

Neither Schwab nor any of the Affiliated Entities has any direct financial, commercial, or business relationship with any Franklin officials listed in the disclosure request.



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9. Gifts to Franklin Officials, Employees, or Fiduciaries

To the best of our knowledge, neither Schwab nor any of the Affiliated Entities has given any gifts to a Franklin official, employee of fiduciary, including any Franklin officials listed in the disclosure request.

10. Political Contributions

Local and State Candidates and Officer Holders

To the best of our knowledge, neither Schwab nor any Schwab officer, director, executive, owner of 5% or greater of Schwab or any Affiliated Entity associated with the Plans, or Schwab party with power to effect decisions regarding actions related to pensions and the conduct of business with a municipality or municipal pension system has given a contribution to any candidate for public office or any person who holds an office in Pennsylvania (or to any political committee of any such party) at the local or State level.

Federal Officer Holders Representing Pennsylvania

To the best of our knowledge, the following is the only Schwab officer, director, executive, owner of 5% or greater of Schwab or any Affiliated Entity associated with the Plans, or Schwab party with power to effect decisions regarding actions related to pensions and the conduct of business with a municipality or municipal pension system that has given a contribution to any candidate for public office or any person who holds an office representing Pennsylvania at the Federal level:

Charles R. Schwab Charles Schwab & Co., Inc. 211 Main Street, 17th Floor	Chairman, The Charles Schwab Corporation Chairman, Charles Schwab Bank San Francisco, CA 94105
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<u>Date</u>	<u>Candidate</u>	<u>Amount</u>
May 17, 2006	Rick Santorum	\$2,100.00
September 21, 2010	Pat Toomey	\$2,400.00

11. Conflicts

We are not aware of any apparent, potential or actual conflicts of interest with respect to any Schwab or Town officer, director or employee.



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12. Additional Disclosures

None

The following Schwab employees participated in the completion of this disclosure:

Robert X. Creevy  
Adolph Ojeda

Director, Corporate Counsel  
Director, Trust Administration

If you have any questions regarding the information provided in this letter, please contact me via phone at (602) 355-3201 or email at [deborah.pritchard@schwab.com](mailto:deborah.pritchard@schwab.com).

Regards,

A handwritten signature in black ink that reads "Deborah Pritchard".

Deborah Pritchard  
Vice President

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I hereby state that I am a Vice President of Charles Schwab Bank, and I am authorized to make this verification. I hereby verify that the facts set forth in this disclosure letter are true and correct to the best of my knowledge, information, and belief. I also understand that knowingly making material misstatements or omissions in this disclosure could subject Charles Schwab Bank to the penalties in Section 705-A(e) of Act 44. I understand that false statements herein are subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Cc:

Corporate Compliance, Charles Schwab & Co., Inc.  
Office of Corporate Counsel, Charles Schwab & Co., Inc.  
Schneider Downs