## **Annual Disclosure of Conflicts**

The Internal Revenue Service requires that the VFW Department disclose on its 990 whether Department Officers, Council Members or key employees have a family or business relationship with any other Department Officer, Council Member or key employee. For purposes of this disclosure:

Key employees are those with more than \$150,000 in compensation.

Family Relationship means: his or her spouse, ancestors, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great grandchildren, and spouses of brothers, sisters.

Business Relationship means: (a) One person is employed by the other or by an organization in which the other is a 35% owner, (b) One person is transacting business with the other in transactions of a value of \$10,000 or more, other than in the ordinary course of business and on the same terms as the general public and (c) The two persons are officers or directors or greater than 10% owners of the same business or investment entity.

$\ \square$ I am not involved in a family or business relationship with any Departmen
Officer, Council Member or key employee.
☐ I am involved in a family relationship with
☐ I am involved in a business relationship with
· ————————————————————————————————————
Signature
Name
Title
Date