

ARRL Board of Directors Confidential

Findings and Recommendations of ARRL Board of Directors Ethics and Elections Committee

Director Ria Jairam Conflict of Interest Inquiry Report

November 10, 2022

Background

The Ethics and Elections Committee (E&E) was made aware of a possible breach of fiduciary responsibility by Director Ria Jairam due to a potential conflict of interest arising from a book authored by her, and from her potential use and/or release of confidential and proprietary ARRL information to a third party.

Director Jairam submitted a disclosure to E&E on June 14, 2022 that she was in the process of writing a technician study guide for retail sale. Director Jairam's disclosure stated that her book was a work for hire, involved a one-time payment, and that she would not be involved in the marketing or distribution of the book. Based on these representations, E&E concluded that the process of producing the book did not entail a conflict of interest. On June 22, 2022, E&E issued a Finding and Recommendation that approved her proceeding with the project (Addendum 1).

On October 24, 2022, E&E Chair Art Zygielbaum was informed in telephone calls from Chief Executive Officer/ Board Secretary David Minster and Board President Rick Roderick that the publication of Director Jairam's book was imminent (with electronic copies to be released in less than a week, on November 1, 2022, and hard copies to be released shortly thereafter on November 15, 2022) and that it appeared similar to ARRL publications. E&E was furnished with the Amazon listing of Director Jairam's book (Addendum 2), which included a description of its contents. E&E was also provided with social media posts from Director Jairam apparently promoting her book (Addendum 3). These posts also seem to indicate that she plans to write additional books. In addition, Mr. Minster and Mr. Roderick expressed concern that because of her role and active involvement on the Administration and Finance Committee (A&F) and the Revenue Subcommittee of A&F, Director Jairam was privy to proprietary and confidential information about ARRL publications that could be used by her or third-party publishers to compete with ARRL publications.

Based on the concerns raised, E&E interviewed Directors Jeff Ryan and Fred Kemmerer, who sit on A&F, Board President Rick Roderick, Board Secretary/Chief Executive Officer David Minster, and Director Jairam to develop an understanding of the situation. E&E was especially interested to know if Director Jairam had disclosed to A&F that she was working on a book or had recused herself during discussions relevant to book publications and marketing strategies.

- In discussions, which included Connecticut counsel and all members of E&E, on October 25, 2022, Board President Rick Roderick and Chief Executive Officer/Board Secretary David Minster, informed E&E about the very sensitive nature of the information discussed by A&F and especially the Revenue Subcommittee. This information included confidential data and strategies derived from that data for the potential revision and marketing of ARRL publications. They were both very concerned about the potential harm that could result to ARRL if a Director with access to confidential information authored and published a book that was in direct competition with an ARRL publication. They were also concerned that such harm was imminent given the forthcoming release date of Director Jairam's book.

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- After reviewing the concerns raised by Mr. Minster and Mr. Roderick, E&E invited Director Jairam to participate in a Zoom discussion on October 27, 2022. Director Jairam agreed to meet later that evening to respond to E&E's preliminary questions. She was cooperative and provided, at E&E's request and for E&E's exclusive review, a pre-release copy of the book and a copy of her contract with Callisto Media, the publisher. She stated that she was surprised by the November 1 publication date of the eBook version of her book and the November 15 publication date for the paper version. She claimed no knowledge of the publication schedule and strategy. In particular, she stated that she was paid a one-time fee and would not receive any royalties or residuals. She further stated that she played no part in the marketing of the book in accord with her contract. She was allowed to distribute a pre-publication pdf version of her book for review. The publisher also supplied her with discounted copies of the publication for use in promoting the book on her own public media website and YouTube channel. Director Jairam told E&E that it took her three months to write the book. When asked if she had considered recusing herself from A&F and Revenue Subcommittee meetings, she stated that she didn't feel the need to. She also said "They knew I was writing the book" emphasizing that she made no secret about it. She represented that she did not consult with ARRL publications in writing her book.
- The day after E&E's meeting with Director Jairam, it held a Zoom meeting on October 28, 2022, with Director Jeff Ryan, chair of A&F, and Director Fred Kemmerer, who sits on A&F and heads the Revenue Subcommittee. At that meeting, both Directors stated that they had no knowledge of Director Jairam's publication project. They both stated that Director Jairam had not asked to be recused from discussions that might be relevant to book publication or marketing strategies. Both Directors Ryan and Kemmerer confirmed that relevant confidential and proprietary information about marketing and revising ARRL publications was discussed in Director Jairam's presence. Director Kemmerer added that Director Jairam was engaged and involved and attended most of the weekly Revenue Subcommittee meetings.

E&E's review of the Callisto Media contract and the pre-print version of the book raised additional concerns surrounding Director Jairam's initial disclosure to E&E on June 14, 2022.

- E&E discovered that Director Jairam's contract was dated March 21, 2022. One section of the contract required that Director Jairam certify that she could enter into the contract and that there were no conflicts or violations that would prevent her from signing. The contract also stipulated that the final authored work was to be delivered to the publisher on June 6, 2022.
- Director Jairam first disclosed her publication project to E&E on June 14, 2022, nearly three months after signing her contract, and after the expiration of the deadline in her contract for completing and delivering her book to the publisher. Upon reviewing the timeline set forth in her contract, E&E developed a strong concern that Director Jairam had not fully or accurately disclosed to E&E several highly relevant facts she possessed about her publication at the time she made her June 14, 2022 disclosure. She did not disclose that she had already entered into the contract with the publisher months prior to her disclosure, and had affirmed in that contract that there existed no conflict of interest. She represented that she was "in the process of writing" her book, even though the deadline for delivery in her contract had already lapsed. She described her book as a "technician study guide" and represented that her work on a publication was not unlike the work of other members of the board who authored books.

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Director Jairam did not disclose that the content of her book overlapped substantially with existing ARRL publications. All publications by ARRL Board members to date were written prior to them joining the Board or were authored in cooperation with the ARRL and appear as ARRL titles. Her disclosure focused primarily on issues of marketing, distribution and promotion of her book, all of which she represented were handled by her publisher.

- The contract also required that the author complete the Amazon Author Page four weeks ahead of the publication release date.

After reviewing her contract and book, E&E requested a further meeting with Director Jairam to address its ongoing concerns. After initially agreeing to participate in a meeting on October 29, Director Jairam cancelled that meeting and instead requested that E&E's additional questions be furnished to her in writing and in advance of the meeting. She further requested a copy of "the complaint" regarding her book. The following day, on October 29, 2022, E&E complied with her request and supplied the questions it planned to discuss. E&E further proposed to have a meeting on Monday, October 31, 2022. E&E noted that it sought to complete its investigation of a potential conflict before the publication of the e-version of her book, and wanted to provide her with an opportunity provide any other relevant information. Director Jairam did not respond to E&E's request for a further meeting.

Upon hearing nothing from Director Jairam, on October 31, 2022 – one day prior to the scheduled release of the e-book version of her book, E&E again reached out to Director Jairam. E&E informed her that based upon the preliminary information it had reviewed, her book appeared to compete directly with ARRL publications, and thus presented a conflict of interest. E&E nonetheless advised her that it would not issue its findings and/or make recommendations to the entire Board until after it had the opportunity to hear from her and receive responses to its questions. E&E further suggested that Director Jairam inform her publisher about E&E's preliminary findings.

On November 1, 2022, Director Jairam responded with a series of her own questions focusing on E&E's investigation process. She demanded the identity of the individuals who first raised these issues, how the issues were presented to E&E, and what information E&E had shared with such individuals. Director Jairam did not offer answers to any of E&E's written questions or provide a date for any further meeting.

That same day, E&E answered her questions and requested, for a third time, that a meeting be scheduled that week. E&E further advised Director Jairam that it remained open and willing to hear from her to mitigate its concerns about a conflict. It further informed her that given the urgency of the issues involved, if Director Jairam did not respond to E&E's questions or wish to have a further meeting, E&E would issue its findings and recommendations on November 4, 2022, based on the information it had. E&E received no further communications from Director Jairam as of the date and time this report was finalized.

According to Amazon, the electronic version of Director Jairam's book became available for purchase on November 1, and the print version remains scheduled, as of the date and time this report was finalized, to be released on November 15.

The ARRL By-Laws Section 46 (Addendum 4) provides specific definitions of a conflict of interest.

- Section 46(b) (1) "A conflict of interest arises when a Board Member or Vice Director has a business, personal, professional, financial or familial interest, affiliation or relationship that

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could materially conflict with the obligations of the Board Member or Vice Director to the ARRL.”

- Section 46(b) (2) [Bold font added for clarity] **“A financial conflict of interest of a Board Member or Vice Director exists if the Board Member or Vice Director (or his or her parents, spouse or partner, children, siblings, or the spouses of children or siblings) has, directly or indirectly, through material equity ownership or voting control, a management position, employment, investment or contract, an interest in or other arrangement with any entity whose business or operation (i) competes with the business or programs of ARRL, or (ii) may be materially affected (positively or negatively) by a decision or action of the Board or by any program, policy, strategy or activity of the League. For purposes of this By-Law, a material ownership or investment interest shall include an equity or voting interest of five percent (5%) or more of the value of the entity.”**
- Section 46(b) (3) “A Board Member or Vice Director may not disclose confidential information obtained by him or her relating to the League to any third person or entity.”
- Section 46(c) (1) “A Board Member or Vice Director and any candidate for election as a Board Member or Vice Director shall promptly disclose to the Ethics and Elections Committee the existence of any potential or actual conflict of interest without delay at the time that the conflict arises during the tenure of the Board Member or Vice Director”
- Section 46(c) (3) “The failure of a Board Member or Vice Director to voluntarily and timely disclose facts that may result in a finding of a potential or actual conflict of interest, whether or not the disclosure is requested by the Ethics and Elections Committee, will be considered a breach of the Board Member or Vice Director's fiduciary obligation to the League and the Board of Directors will determine an appropriate sanction therefor, even if no harm to the League results from the nondisclosure.”

Under By-Law Section 46(f) each member of the Board must annually certify that they have read and that they agree to abide by the disclosure requirements. The applicable signed document for Director Jairam appears as Addendum 5.

In order to understand the fiduciary and legal issues involved in this inquiry, E&E held several meetings with ARRL Connecticut Counsel. Consistent with the above referenced By-Laws provisions and relevant Connecticut statutory law, the members of a Board of Directors have a fundamental fiduciary duty to further and protect the best interests of the organization they serve. A Director has a strict fiduciary responsibility to do no harm to the organization. A conflict of interest through the production and marketing of a competing product can clearly cause financial harm to the organization. A director also has a proactive obligation to fully disclose potential conflicts of interest in a timely manner. Failure to do so causes harm to the organization by creating the appearance of impropriety and potentially undermining confidence in the Board's policies. The release of proprietary and confidential information to a third party can provide an unfair advantage to a competing individual / organization.

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Findings

Based upon interviews, review of information obtained and discussions with ARRL Connecticut Counsel, E&E has determined, 1) that Director Jairam did not fully nor in a timely manner disclose the potential conflict of interest created by the publication of her book. E&E was notified of the potential conflict of interest only after the potential conflict of interest was definitively created by the signing of a contract with and including an accepted delivery date of authored material to Callisto Media, 2) that Director Jairam authored a book that is substantially similar to and directly competes with at least one ARRL publication, the "ARRL's Tech Q&A" manual, and 3) Director Jairam remained actively involved as a member of A&F and the Revenue Subcommittee of A&F without notifying the A&F and/or its Revenue Subcommittee about her publication or recusing herself from discussions involving proprietary and confidential ARRL financial, marketing, production, and distribution plans.

It is the unanimous position of E&E that Director Jairam's publication (and ongoing sale) of a book that directly competes with at least one ARRL publication constitutes an actual conflict of interest in violation of Sections 46(b)(1) and (3) of the ARRL By-Laws. E&E further finds that the lack of a timely, transparent, and complete disclosure of a potential conflict of interest in Director Jairam's original disclosure constitutes a violation of Section 46(c)(1) of the ARRL By-Laws.

E&E has not thus far discovered evidence sufficient to definitively conclude that Director Jairam used and/or disclosed ARRL confidential information to a third party and/or used such information for personal gain as prohibited by Section 46(b)(3).

Because improperly handled conflicts of interest constitute a violation of a Director's fundamental fiduciary responsibilities owed to the organization, E&E, in consultation with Connecticut counsel, spent considerable time identifying and discussing remedies specified by the ARRL By-Laws, censure as defined by Robert's Rules of Order, and a warning letter issued by E&E.

E&E decided that based on the findings, the minimum level of action we could recommend is Level 1 Recusal as defined by ARRL By-Law Section 46(d) (1). This would require that Director Jairam recuse herself from all discussions at Board, committee, or subcommittee meetings where information within the scope of the conflict of interest is discussed. However, this would not prevent Director Jairam from having access to documents, electronic communications and/or other sources which might contain information within the scope of the conflict of interest. E&E considered recommending an additional prohibition against providing such information via documentation, electronic communications, and/or other sources to Director Jairam. Implementing such a directive would require separate email lists – one where the restricted information was allowed and one where it was not – and the creation of separate documents – again, documents with and without the restricted information. E&E believes that this remedy would not resolve the conflict of interest because of the onerous complexity of implementation and obvious difficulty in assuring compliance.

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Recommendation

Based upon the Findings in this report, E&E concludes that Director Jairam, as defined under ARRL By-Laws Section 46(e), “is engaged in an ongoing business or activity that directly, materially and consistently competes with an active program, business interest or activity of the League on a continuing basis.” For the reasons provided above, E&E does not feel that recusal at any level defined in ARRL By-Law Section 46(d) provides a viable remedy for resolving the conflict of interest.

Therefore, E&E, by unanimous vote, hereby recommends to the ARRL Board of Directors that Director Jairam, because of the existence of an inadequately disclosed ongoing conflict of interest and the absence of any information which mitigates E&E’s findings, be disqualified from being a member of the ARRL Board of Directors under ARRL By-Laws Section 46(e).

Respectfully Submitted on November 10, 2022, by the ARRL Ethics and Elections Committee

Arthur I. Zygielbaum, KØAIZ, Chair
Vernon E. (Bill) Lippert, ACØW
David A. Norris, K5UZ

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Addendum 1: E&E Findings and Recommendations on Director Jairam's Disclosure. [Text unrelated to the current inquiry has been redacted.]

E&E Findings and Recommendations

Director Ria Jairam Disclosure

June 22, 2022

The following disclosures were received by E&E from Director Ria Jairam on June 14, 2022.

To the E&E committee -

I would like to make a couple of disclosures with regard to employment and projects I have been working on.

Disclosure #1 - Authoring a Technician study guide as work for hire.

I am in the process of writing a technician study guide for retail sale. It is a one time work for hire and I am being paid a one time fee. There are no ongoing royalties being paid, as they take full ownership of the work. The publishing company is Rockridge Press aka Callisto Media. Their retail channel is primarily Amazon. They handle all marketing. This is different from how traditional book deals are done. The book is scheduled to be published in November, 2022.

As I do not have any control of the work after it is handed to the publishing company, I suggest that the recusal requirements can be minimal. I am willing to recuse myself from decisions on the publishing side of the business if needed, although based on the terms of the deal this may not be necessary as I do not control ongoing publishing and distribution of the work once I hand it in. This is not without precedent as we have had others on ODV who are/were book authors.

I do not and will not use my position with ARRL to promote the book. In the author bio I mention that I serve the ham community in several capacities "including ARRL" but I was not specific about the role, as I did not want it to appear that I am using my position as Director to influence sales.

Due to the fact that I am currently under NDA for this project, I request that the specifics of this be kept E&E confidential.

Disclosure #2 –

[Text unrelated to the current inquiry has been removed.]

Please do not hesitate to contact me if you require further clarification.

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Thank you for your time.

73

Ria Jairam, N2RJ
Director, Hudson Division

The E&E Committee has reviewed the request and finds/recommends the following:

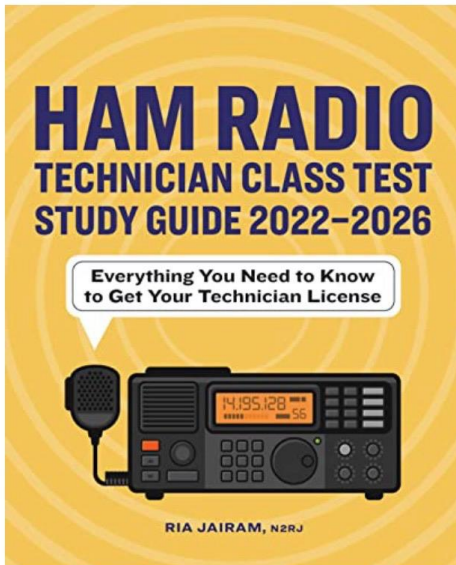
Item #1, Technician study guide authoring

E&E does not see any conflict of interest given the conditions stated. (We wish Director Jairam success in this endeavor.)

[Text unrelated to the current inquiry has been removed.]

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Addendum 2: Amazon Listing



Ham Radio Technician Class Test Study Guide 2022 - 2026: Everything You Need to Know to Get Your Technician License

[^ See less](#)

Ria Jairam N2RJ (Author)

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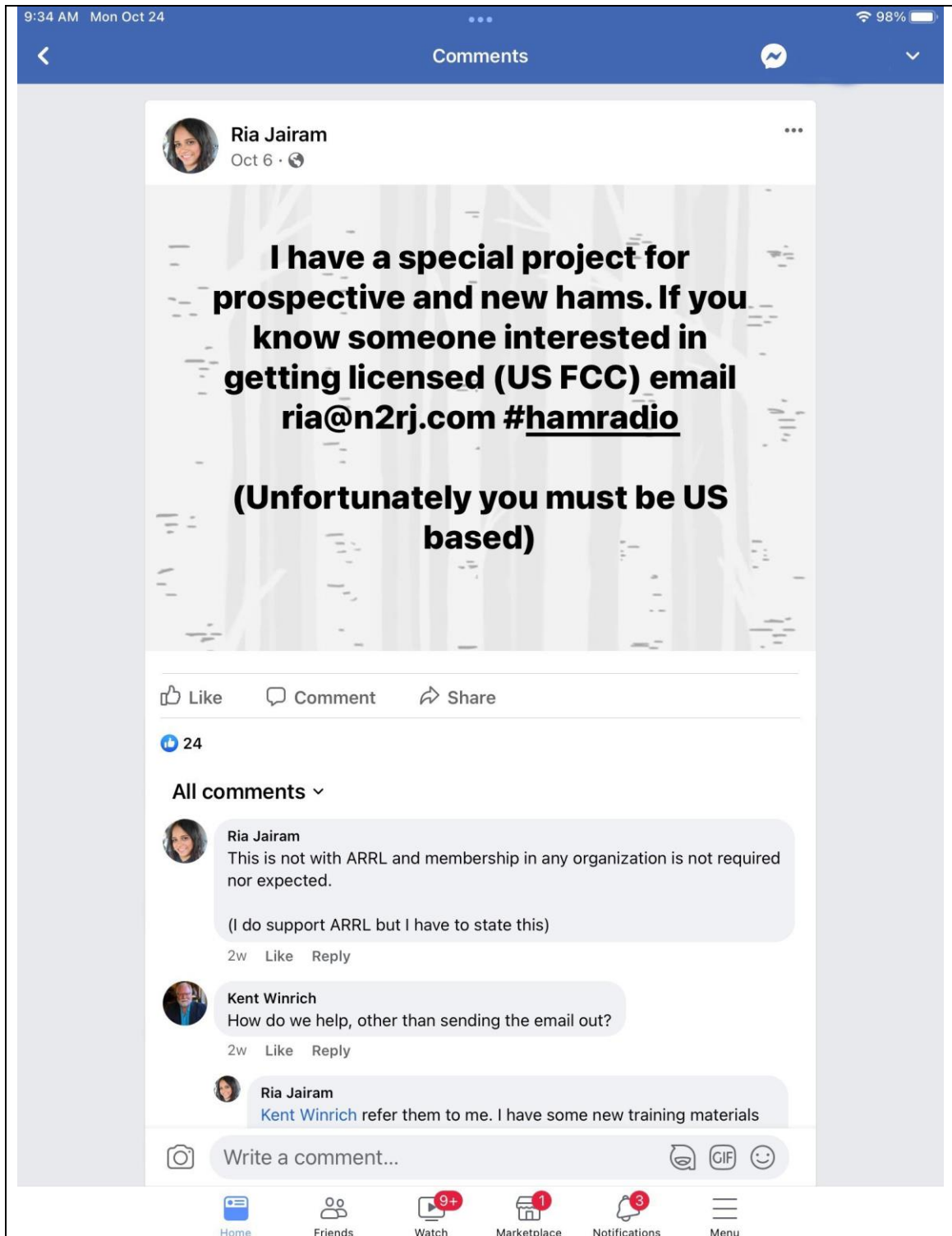
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Addendum 3: Social Media Posts




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AT&T LTE 10:31 PM 97%
Q ria jairam

Ria Jairam (@riajairam) • Instagram photos and videos

Ria Jairam. Video creator, #hamradio operator N2RJ && M0RAJ (est.1997), #Trini lost In Jersey. I love renewable energy and energy storage.


Twitter

 Ria Jairam - N2RJ

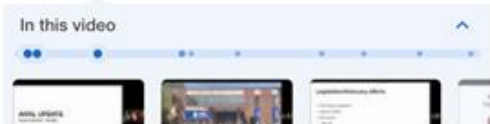
I wrote a ham radio book! Study for your tech license. Email me ria@n2rj.com if you'd like an advance copy. Especially if you know someone wanting to study for their tech license. #hamradio

2 days ago

Videos

 Ria Jairam N2RJ Discusses "Amateur Radio in Trinidad..."
YouTube - FairlawnARC.org
Oct 14, 2021


In this video




3:42 Safari
Ria Jairam - N2RJ 8,218 Tweets Follow back


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2 19

 Ria Jairam - N2RJ @RiaJai... · 3d ...
Here is a good #hamradio conference if you want something different. It's down undah, in Australia and some good stuff, virtual on Zoom. reast.asn.au/news-events/ta... Only \$12. h/t @HamRadioDX

6

 Ria Jairam - N2RJ @RiaJai... · 5d ...
I wrote a ham radio book! Study for your tech license. Email me ria@n2rj.com if you'd like an

20+

Home Search Activity Alerts Messages

Addendum 4: ARRL By-Laws Section 46 on Conflicts of Interest

Conflicts of Interest

46. Conflict of Interest Policy

(a) Purposes

The purposes of this Conflict of Interest Policy are threefold: (1) to preserve the confidentiality of business, financial, strategic, or other information, data or plans not intended for public dissemination which, if disclosed, could in the view of the Board harm the League; (2) to protect the integrity of the decision-making process of the Board so that the deliberations, contributions and decisions of the Board are made in the sole interest of the League and its members collectively; and (3) to ensure that no one will be eligible for, or hold, the office of Director, Vice Director, President or Vice President whose business connections are of such nature that his or her influence in the affairs of the League could be used for his or her private benefit or materially conflict with the activities or affairs of the League. The Board shall effectuate the following policies in order to further these three purposes and to fulfill the fiduciary obligations that Board members have to the League. This policy is intended to supplement but not supersede any applicable laws governing conflicts of interest in Connecticut nonprofit and charitable corporations.

(b) Conflicts of Interest

1) A conflict of interest arises when a Board Member or Vice Director has a business, personal, professional, financial or familial interest, affiliation or relationship that could materially conflict with the obligation of the Board Member or Vice Director to the ARRL.

2) A financial conflict of interest of a Board Member or Vice Director exists if the Board Member or Vice Director (or his or her parents, spouse or partner, children, siblings, or the spouses of children or siblings) has, directly or indirectly, through material equity ownership or voting control, a management position, employment, investment or contract, an interest in or other arrangement with any entity whose business or operation (i) competes with the business or programs of ARRL, or (ii) may be materially affected (positively or negatively) by a decision or action of the Board or by any program, policy, strategy or activity of the League. For purposes of this By-Law, a material ownership or investment interest shall include an equity or voting interest of five percent (5%) or more of the value of the entity.

3) A Board Member or Vice Director may not disclose confidential information obtained by him or her relating to the League to any third person or entity.

4) A finding that a conflict of interest exists does not indicate that any unethical or improper action on the part of a Board Member or Vice Director has been taken. Acknowledgement of conflicts through voluntary disclosure, and mitigation of the effects of conflicts, principally through some level of recusal, avoids the appearance of impropriety that otherwise might undermine confidence in the Board's policies.

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(c) *Duty to Disclose*

1) A Board Member or Vice Director and any candidate for election as a Board Member or Vice Director shall promptly disclose to the Ethics and Elections Committee the existence of any potential or actual conflict of interest without delay at the time that the conflict arises during the tenure of the Board Member or Vice Director or during the candidacy of the Candidate for election. Candidates for election as a Director or Vice Director shall disclose to the Ethics and Elections Committee any potential or actual conflict of interest that exists at the time of the submission of their nominating petition.

2) When requested by the Ethics and Elections Committee and not less frequently than once a year, each Board Member and Vice Director shall promptly submit a statement to that Committee identifying all business, personal, professional, financial, familial and other affiliations of the Board Member or Vice Director or his or her family members (i.e. parents, spouse or partner, children, siblings, or the spouses of children or siblings) that could reasonably be considered to be a conflict of interest as defined above, whether or not the Board Member or Vice Director believes that a conflict exists.

3) The failure of a Board Member or Vice Director to voluntarily and timely disclose facts that may result in a finding of a potential or actual conflict of interest, whether or not the disclosure is requested by the Ethics and Elections Committee, will be considered a breach of the Board Member or Vice Director's fiduciary obligation to the League and the Board of Directors will determine an appropriate sanction therefor, even if no harm to the League results from the nondisclosure.

4) After disclosure of an actual or potential conflict of interest by a Board Member or Vice Director or candidate for election as a Director or Vice Director, the disinterested members of the Ethics and Elections Committee shall determine whether a conflict of interest exists. A finding of an actual or potential conflict involving a Board Member or Vice Director shall be referred to the Board for determination of an appropriate remedy unless the Committee determines that the conflict is *de minimis* and recusal is unnecessary. The interested Board Member or Vice Director shall recuse himself or herself from any vote upon any proposed matter, transaction, contract, or arrangement in connection with which an actual or potential conflict of interest has been disclosed by that Board Member or Vice Director until such time as the Ethics and Elections Committee and/or the Board has addressed the actual or possible conflict of interest.

(d) *Recusal*

The principal means of resolving conflicts of interest involving Board Members or Vice Directors will be by recusal of that Board Member or Vice Director. Upon a factual finding by the Ethics and Elections Committee that a Board Member or Vice Director has a conflict of interest and that the conflict is not *de minimis*, the Committee will make a recommendation to the Board as to the level of recusal determined to be appropriate on a case-by-case basis. The Board of Directors will then decide by majority vote which level of recusal (if any) is appropriate in that case. The levels of recusal are as follows:

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1) The interested Board Member or Vice Director will be asked to leave the meeting room so that the Board can freely discuss and vote on the issue about which the conflict exists. Once the vote is taken, the recused Board Member or Vice Director may return to the meeting.

2) The interested Board Member or Vice Director may be allowed to remain in the room but not participate in the discussions or vote on the issue about which the conflict exists.

3) The interested Board Member or Vice Director may be allowed to remain in the room and participate in the discussions but not vote.

Upon recusal of a Director per levels 1 or 2 above, that Division's Vice Director shall fulfill the duties of the recused Director in discussion and voting on such matter. Upon recusal of a Director per level 3 above, that Division's Vice Director shall fulfill the duties of the recused Director in voting on such matter. A decision by the Board on recusal of a Board Member or Vice Director shall state the reason for the recusal, which shall be noted in the minutes of the Board of Directors.

(e) Disqualification

Disqualification of a Board Member or Vice Director to serve or continue to serve due to a finding of a conflict of interest is a remedy that is to be applied by the Board of Directors only in the rarest of circumstances. The Board, upon a majority vote, may disqualify an incumbent Board Member or Vice Director upon a finding that the Board Member or Vice Director (or his or her parents, spouse or partner, children, siblings, or the spouses of children or siblings) (1) is engaged in an ongoing business or activity that directly, materially and consistently competes with an active program, business interest or activity of the League on a continuing basis, or which engages regularly or periodically in commercial business transactions with the League; and (2) that application of any of the three levels of recusal would be inadequate or insufficient to accomplish the purposes of this Conflict of Interest policy; and (3) that the nature of the conflict of interest is so pervasive and continuous as to render the Board Member or Vice Director ineligible to serve or continue to serve.

(f) Annual Statements

Each Board Member and Vice Director shall annually sign a statement which affirms that such person:

- 1) Has received a copy of the current Conflict of Interest policy set forth in this Bylaw;
- 2) Has read the Bylaw;
- 3) Agrees to comply with the disclosure requirements; and
- 4) Acknowledges that the League is a non-profit organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

The failure of a Board Member or Vice Director to sign such statement on a timely basis will render that Board Member or Vice Director ineligible to serve or continue to serve.

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Addendum 5: Director Ria Jairam Conflict of Interest Certification

Note: the date on this form below, 01/06/2021 is incorrect. The form was submitted via email on January 6, 2022

Subject:

Re: IMPORTANT - Conflict of Interest Certification Form

From:

"Jairam, Ria, N2RJ (Dir, HD)" <n2rj@arrl.org>

Date:

1/6/2022, 12:10 PM

To:

"Gonzalez, Juan Pablo (JP), KC1RNY" <JPGonzalez@arrl.org>

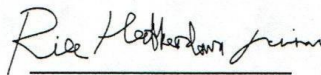
Attached is my form.

Page 5

ARRL Conflict of Interest Certification Form

The undersigned ARRL official affirms that he/she:

- (i) has received a copy of the current conflict of interest policy set forth in Bylaw 46;
- (ii) has read the Bylaw;
- (iii) agrees to comply with the disclosure requirements; and
- (iv) acknowledges that the League is a non-profit organization and that, in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.



Signature

N2RJ

Call Sign

01/06/2021

Date