

CODE OF ETHICS

INTERNATIONAL LONGSHOREMEN'S ASSOCIATION

CODE OF ETHICS - 1/1/04

PREAMBLE

WHEREAS, fair and ethical practices are fundamental to the proper functioning of the International Longshoremen's Association, AFL-CIO (hereinafter referred to as "ILA"), and that appropriate operation can only be achieved and sustained if all officers, employees, and agents of the ILA, its Districts, its constituent Locals and other entities observe the highest standards of ethical conduct, and

WHEREAS, by the imposition of certain trusteeships, internal union discipline, and other techniques, the ILA President and the ILA Executive Officers are committed to eliminating corrupting influences from the ILA, its Districts, its constituent locals and other entities within the Union, and

WHEREAS, for the benefit of the ILA, its Districts, its Locals, other entities, and members (hereinafter jointly referred to as the AILA@ or "Union"), a Code of Ethics including a system of investigatory and disciplinary procedures designed to rid the Union of corrupting influences and guide the future conduct of the union is deemed beneficial, the ILA Executive Officers hereby adopt the following Code of Ethics.

CODE OF ETHICS

The Code is a set of fundamental values to guide the officers, employees and rank-and-file members in their day-to-day decision-making and conduct. It is intended to express the ILA's fundamental values, and guiding principles. The Code supplements the obligations already imposed on the ILA, its Districts, and constituent Local Unions, officers, employees and rank-and-file members by the ILA Constitution, federal and state law, and applicable regulations. The Code and its enforcement provisions shall apply prospectively to guide the future conduct of the ILA, Districts, and Local Unions, and officers, employees and members, and union trustees and employees of any political action committee.

The Code is meant to complement the ILA Constitution, Local bylaws, and other required rules of conduct, not to substitute for them. The Code cannot and does not supersede governing law, including the Labor Management Reporting and Disclosure Act ("LMRDA") and the law of Canada.

I. Democratic Practices

1. The ILA's traditions, its Constitution, and federal law protect the democratic rights of ILA members to participate fully, without fear, abuse, or intimidation in all Union affairs. To that end, the following principles shall be respected.
2. Each member in good standing shall be entitled to full participation in Union self-government. Each member in good standing shall enjoy full freedom of speech and the right to participate in the democratic decisions of the ILA and his Local Union. Subject to reasonable rules, regulations, and qualifications, each eligible member shall have the right to run for office, to nominate through duly established constitutional procedures, and to vote in free, fair and honest elections. In a democratic union, as in a democratic society, every member has certain rights, but he also must accept certain corresponding obligations. Each member shall have the right to freely criticize the policies and personalities of Union officials; however, this does not include the right to undermine the ILA or its constituent Local Unions as institutions; or to carry on activities with complete disregard for the rights of other members and the interests of the ILA or its Locals; or to subvert Union goals in collective bargaining or to advocate or engage in dual unionism.
3. Local Union membership meetings shall be held regularly, with proper notice of time and place and shall be conducted in an atmosphere of fairness and democracy, and in accordance with Articles XII and XIII of the ILA Constitution.
4. All ILA and Local Union rules and laws must be fairly and uniformly applied, and disciplinary procedures shall be fair and afford due process to each member as required by the LMRDA, the ILA Constitution and this Code of Ethics.

5. The ILA and Local Unions shall ensure that their operations are conducted in a democratic and fair manner. Regularly scheduled Local Union elections shall be conducted by secret ballot. Corruption, discrimination or anti-democratic practices shall not be tolerated.

II. Fiduciary Duties

1. The officers of the ILA and its Local Unions have a duty to exercise their authority solely on behalf of and for the benefit of the Union and its members. These officers must set aside their personal interests and act in the best interests of the Union and its members.
2. Officers should avoid conflicts of interest between the needs of the Union and their own personal interests.
3. Officers should report any real or potential conflicts of interest to the Executive Council of the ILA or the Executive Board of the Local Union as applicable.
4. The fiduciary duty to act on behalf of the Union lies at the heart of ethical practices required by the ILA. This is a high calling and one that is seen in action every day, as those working for the Union put in countless hours and tireless effort to improve the Union, assist its members and advance the cause of workers everywhere. The fiduciary duty owed to the Union has many components as set forth in more detail below.

III. Financial Practices

1. Union funds are held in trust for the benefit of the membership. The membership is entitled to assurance that their funds are not dissipated and are spent for proper purposes. The membership is also entitled to be reasonably informed as to how union funds are invested or used.
2. The Union should not permit any of its funds to be invested or expended in a manner which results in the personal profit or advantage of any officer or representative of the Union.
3. Neither the ILA, Districts nor any Local Union shall make loans to its officers, representatives, employees, members, or members of their families, for the purpose of financing the private business of such persons.
4. Officers and representatives are prohibited from accepting money or other things of value from any employer or any agent of an employer in violation of applicable law.
5. The solicitation or receipt of a bribe, kickback or tip in connection with Union business or a Union benefit plan is prohibited.

IV. Union Benefit Plans

1. No official, representative or employee of the ILA, a District or a Local Union, or any union trustee of a benefit fund, shall receive fees or salaries of any kind from a fund established for the provision of health, welfare or retirement benefits, except for reasonable reimbursement of expenses provided for in a collective bargaining agreement or trust agreement covering ILA represented employees and expressly approved by the appropriate Board of Trustees, or, in the case of an employee of the Fund, where it has been authorized; except that any person who already receives full-time pay from the ILA, or an ILA affiliate shall not receive compensation from any ILA or ILA local affiliate plan except for reimbursement of expenses properly and actually incurred.
2. Persons who serve as fiduciaries of a benefit plan covering members or employees of the Union shall faithfully serve the best interests of the beneficiaries of the plan in accordance with the requirements of applicable law.
3. Persons who serve as fiduciaries of a benefit plan covering members or employees of the Union shall exercise their duties with respect to the plan with the care, skill, prudence, and diligence under the circumstances that a prudent person familiar with such matters would use acting under similar circumstances.
4. Neither persons who serve as fiduciaries nor any member of the fiduciary's family shall profit personally from his or her position in the plan, other than through benefits payable under the generally applicable rules of the plan or reasonable compensation payable by the plan for services rendered the plan, which services are necessary for the establishment or operation of the plan.

V. Business and Financial Activities of Union Officials

1. No officer or representative of the ILA, the Districts or Local Unions shall have a personal financial interest which conflicts with his Union duties.

2. Except through stock purchase plans, profit-sharing or retirement plans, no officer or representative shall have any substantial interest in a business with which the ILA bargains collectively, as provided by applicable law.
3. No officer or representative shall accept bribes, kickbacks, under-the-table payments, tips, gifts, entertainment or any personal payment of any kind, other than regular pay and benefits for work performed as an employee, from an employer with which the union bargains collectively or from a business or professional enterprise with which the union does business.
4. Federal law requires the retention of certain records for specific minimum periods of time. Officers of the Union should familiarize themselves and comply with all applicable law regarding retention of records.
5. Destruction of Union records, except in accordance with established law and Union procedures, is prohibited.
6. Vendors should be selected solely on the basis of cost, quality, timeliness, location, convenience, and whether the vendor is unionized. Knowingly paying excessive amounts for goods or services is a breach of fiduciary duty. In selecting a vendor, comparison shopping may be necessary; cost is not the sole criterion. It is not necessary always to select the cheapest provider of goods or services if other factors such as experience and dependability of the vendor and/or quality of the product outweigh cost.
7. The principal or a designated officer of each Local Union is responsible for documenting the reasons for selecting vendors.

VI. Prohibited Conduct

1. No officer, representative or employee, and no Union trustee of any benefit fund, shall engage in "prohibited conduct." The following conduct is prohibited:
 - (a) committing any act of racketeering, as defined in 18 U.S.C. '1961(1) (a complete list of these crimes is set forth in Appendix A, which is appended to this Code);
 - (b) knowingly associating with any member or associate of an organized crime family or syndicate (a definition of "knowingly associating" and the exceptions to that definition are described in Appendix B);
 - (c) knowingly allowing any organized crime member or associate to influence the affairs of the Union;
 - (d) improper contact with individuals barred from Union activity;
 - (e) soliciting or accepting payments for jobs or other employment preferences from any member, employee, or prospective employee or member; and
 - (f) interfering in any way with the operation of this Code of Ethics or with the persons responsible for its administration.
2. No officer, representative or employee shall knowingly aid, abet or assist any individual who has been barred from Union activity in participating in the affairs of the ILA, a District, the Local Unions or any trust or benefit funds. The Ethical Practices Counsel shall maintain and make available upon a member's request a list of barred members.

VII. Compliance and Enforcement System

1. To ensure compliance with the Code of Ethics, the ILA will provide education and training on a continuing basis for all officers, representatives, employees, and members. Officers will receive further education regarding these matters through the ILA's General Counsel's office and/or attendance at established programs geared to Union officials.
2. The ILA hereby creates the position of Ethical Practices Counsel for purposes of dealing with organized crime influences, corruption, and enforcing the provisions of Part VI of this Code. The ILA President, with the approval of the Executive Officers, shall appoint an Ethical Practices Counsel from a list of recommended candidates submitted to the President. The Ethical Practices Counsel shall have an unimpeachable reputation for integrity, have law enforcement experience including experience in conducting investigations and preparing investigative reports, be an attorney, and be familiar with the structure and purposes of labor unions. As a condition of the appointment, the Ethical Practices Counsel shall resign any employment or membership he may have with any ILA affiliate and shall sign an agreement not to seek or accept any office or other employment with any ILA affiliate or with a company that employs ILA members for two (2) years year from the termination of his position as Ethical Practices Counsel. The Ethical Practices Counsel shall serve a fixed term of one (1) year and can be reappointed. He shall not be removed except for good cause as found by the ILA President, and concurred in by the ILA

Executive Council. The Ethical Practices Council shall receive compensation in an amount set by the ILA Executive Council.

3. The Ethical Practices Council shall investigate allegations of organized crime influence, corruption, or engaging in prohibited conduct under Part VI. The Ethical Practices Council shall be sensitive to the danger of unresolved allegations during political campaigns because of the irreparable harm that can be caused to a person wrongly accused of a violation. The Ethical Practices Council's role does not include the investigation of routine complaints or grievances by members, or of alleged violations of the ILA Constitution, unless the matter also involves an allegation of organized crime influence, corruption or prohibited conduct under Part VI above. To avoid the possibility of interference with other investigations and/or to avoid a duplication of efforts, the Ethical Practices Council shall have the discretion to defer to law enforcement agencies or other agencies or individuals charged with the obligation of investigating organized crime influence, corruption or conduct otherwise prohibited by the union under Part VI above.

4. The ILA shall purchase a policy of insurance and/or bonds, in an appropriate amount, to protect the person holding the position of Ethical Practices Council, and any persons hired by or acting on his behalf, from personal liability for any of their actions under this Code. If such insurance is not available, or if the ILA Executive Council so elects, the ILA may indemnify the Ethical Practices Council, and any persons hired by or acting on his behalf, from personal liability (and costs incurred to defend against any claim of liability) for any of their actions under this Code.

5. The Ethical Practices Council shall have the authority and duty to investigate and file charges against any officer, representative, employee or member of the ILA.

6. If the investigation by the Ethical Practices Council indicates that a charge or charges should be filed, the Ethical Practices Council shall prepare a complete report of the investigation supporting the charge or charges. The Ethical Practices Council shall then file the charge in accordance with Article XVIII of the ILA Constitution.

7. The procedures for those hearings will be as set forth in Article XVIII, Section 1(f) of the ILA Constitution.

8. Failure to cooperate timely with the Ethical Practices Council by refusing to respond to a request to answer questions or provide documents, or by knowingly providing false or fraudulent answers or documents, is a violation of this Code. Assertion of the Fifth Amendment privilege against self-incrimination shall constitute a failure to cooperate.

9. The ILA General Counsel, in conjunction with the Ethical Practices Council, shall study the operations of the Union and recommend changes to the Executive Council to improve those operations in order to prevent and eliminate corruption and racketeering activity. The operations that the ILA General Counsel's Office and ILA Ethical Practices Council shall study include, but are not limited to, the following:

(a) the procedures used by the Union to investigate and discipline misconduct by the officers, representatives, employees, and members;

(b) the procedures used to fill vacancies in Union positions;

(c) the procedures used to select service providers;

(d) the employment procedures;

(e) the practices relating to the imposition of trusteeships and other sanctions against subordinate organizations; and

(f) the administration of the Code and the need for modification, if any.

10. Within twelve months from the appointment of the Ethical Practices Council, the ILA General Counsel and the Ethical Practices Council will submit a report, making recommendations to the ILA Executive Council based upon their study.

11. The ILA will provide the Ethical Practices Council with sufficient resources to fulfill his mandate. The Ethical Practices Council shall have complete and unfettered access to, and the right to make copies of all books, records, accounts, correspondence, files, and other documents of any individual or entity.

12. The Ethical Practices Council shall have the right to take and require the sworn statement, or sworn oral deposition, of any officer, representative, employee, or member of the Union. If any person refuses to testify or to provide evidence before the Ethical Practices Council, including a refusal on the basis of the privilege against self-incrimination, discipline may be imposed on such person for that reason alone.

13. The names of any persons to be employed by the ILA, a district, or any Local Union, must be submitted to the Ethical Practices Council for review, except for positions exempted by the Ethical Practices Council.

If the Ethical Practices Council concludes that the appointment is inconsistent with the objectives and purposes of the Code of Ethics, he may disapprove the appointment.

VIII. Duty to Report Felony Arrests, Indictments, or Criminal Charges, and Suspension of Criminally Charged Officers

1. Any officer of the ILA, a District, or Local Union, and all members serving as trustees of any employee benefit plan, fund, or trust must notify the Ethical Practices Council in writing within five (5) days whenever they learn that any officer, representative, employee, or labor trustee of the ILA, a District or Local Union has been arrested, indicted, or otherwise criminally charged with any felony or with violation of any law relating to the affairs of a labor organization or employee benefit plan.
2. Upon receipt of notice that any officer, representative, employee or labor trustee of the ILA, District or Local Union has been criminally charged with any felony violation of a federal or state law, or for any violation of a federal or state law relating to the conduct of the affairs of a labor organization or employee benefit, the ILA President shall place the accused individual on a temporary leave of absence with pay. The Ethical Practices Council shall then promptly institute an investigation regarding the allegations, and provide a written report of his investigation to the ILA Executive Council and the General Counsel's Office. After considering the Ethical Practices Council's investigative report and after conferring with General Counsel, the ILA Executive Council shall determine:
 - (a) whether the offense for which the accused individual was charged constitutes "prohibited conduct" under Part VI above; and
 - (b) the appropriate discipline that should be imposed on the accused individual, if any, including whether and for how long to continue the suspension and whether the suspension should be with or without pay; and
 - (c) whether the charge requires that any Local Union impacted by the alleged criminal activity needs to be placed under trusteeship by the ILA.
3. The information gathered by the Ethical Practices Council shall be confidential until charges are brought.
4. The provisions of this Section are intended to be in addition to, and not in lieu of, any other rules that may be imposed by federal or state law, or by regulatory bodies like the Waterfront Commission.

IX. Hotline

1. A toll-free telephone number will be created to serve as a Hotline for members to report any incidents or allegations of organized crime influence, corruption and/or prohibited conduct under Part VI above.
2. The Hotline will allow members to provide information to the Ethical Practices Council while maintaining their anonymity. The ILA waives its right to obtain information learned in confidence by the Ethical Practices Council.
3. The Hotline is not intended to be used for routine complaints about employers, Union officers, or ILA policy unless the matter involves an allegation of organized crime influence, corruption or prohibited conduct under Part VI above.

X. Hiring Hall Guidelines

1. Many Local Unions operate referral lists. An employer contacts the local union office to state that it needs workers, and the office then refers workers to the employer. Such referral systems should be operated with scrupulous fairness for all members as the members' livelihood is at stake. There should be no discrimination in making a referral.
2. A Local Union operating a referral system shall base referrals only on objective standards. Work assignments must be based only on these standards and the standards shall not be applied in an arbitrary or discriminatory fashion.
3. The procedure by which the referral list is operated must be in writing and available upon request to any member. The procedure must include a system for contemporaneously recording how each referral is placed. The record-keeping provisions of the referral system must be adequate to make it possible to check whether the system has been operating fairly and impartially.

4. Any officer, representative or employee of the ILA, a District or Local Union who offers, solicits or accepts money or anything of value in return for a job assignment or membership in the union will be subject to discipline.

XI. Duty to Read and Apply This Code of Ethics

1. It is the duty and obligation of every officer, representative and employee to read, and follow this Code of Ethics. Each officer, representative and employee shall verify to the Ethical Practices Counsel that he has read and understood the Code of Ethics.

Appendix A

"Racketeering activity" means

(A) any act or threat involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene matter, or dealing in a controlled substance or listed chemical (as defined in '102 of the Controlled Substances Act), which is chargeable under State law and punishable by imprisonment for more than one year;

(B) any act which is indictable under any of the following provisions of title 18, United States Code: Section 201 (relating to bribery), section 224 (relating to sports bribery), sections 471, 472, and 473 (relating to counterfeiting), section 659 (relating to theft from interstate shipment) if the act indictable under section 659 is felonious, section 664 (relating to embezzlement from pension and welfare funds), sections 891-894 (relating to extortionate credit transactions), section 1028 (relating to fraud and related activity in connection with identification documents), section 1029 (relating to fraud and related activity in connection with access devices), section 1084 (relating to the transmission of gambling information), section 1341 (relating to mail fraud), section 1343 (relating to wire fraud), section 1344 (relating to financial institution fraud), section 1425 (relating to the procurement of citizenship or nationalization unlawfully), section 1426 (relating to the reproduction of naturalization or citizenship papers), section 1427 (relating to the sale of naturalization or citizenship papers), sections 1461-1465 (relating to obscene matter), section 1503 (relating to obstruction of justice), section 1510 (relating to obstruction of criminal investigations), section 1511 (relating to the obstruction of State or local law enforcement), section 1512 (relating to tampering with a witness, victim, or an informant), section 1513 (relating to retaliating against a witness, victim, or an informant), section 1542 (relating to false statement in application and use of passport), section 1543 (relating to forgery or false use of passport), section 1544 (relating to misuse of passport), section 1546 (relating to fraud and misuse of visas, permits, and other documents), sections 1581-1588 (relating to peonage and slavery), section 1951 (relating to interference with commerce, robbery, or extortion), section 1952 (relating to racketeering), section 1953 (relating to interstate transportation of wagering paraphernalia), section 1954 (relating to unlawful welfare fund payments), section 1955 (relating to the prohibition of illegal gambling businesses), section 1956 (relating to the laundering of monetary instruments), section 1957 (relating to engaging in monetary transactions in property derived from specified unlawful activity), section 1958 (relating to use of interstate commerce facilities in the commission of murder-for-hire), sections 2251, 2251A, 2252, and 2260 (relating to sexual exploitation of children), sections 2312 and 2313 (relating to interstate transportation of stolen motor vehicles), sections 2314 and 2315 (relating to interstate transportation of stolen property), section 2318 (relating to trafficking in counterfeit labels for phonorecords, computer programs or computer program documentation or packaging and copies of motion pictures or other audiovisual works), section 2319 (relating to criminal infringement of a copyright), section 2319A (relating to unauthorized fixation of and trafficking in sound recordings and music videos of live musical performances), section 2320 (relating to trafficking in goods or services bearing counterfeit marks), section 2321 (relating to trafficking in certain motor vehicles or motor vehicle parts), sections 2341-2346 (relating to trafficking in contraband cigarettes), sections 2421-24 (relating to white slave traffic);

(C) any act which is indictable under title 29, United States Code, section 186 (dealing with restrictions on payments and loans to labor organizations) or section 501(c) (relating to embezzlement from union funds);

(D) any offense involving fraud connected with a case under title 11 (except a case under section 157 of this title), fraud in the sale of securities, or the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act) punishable under any law of the United States,

(E) any act which is indictable under the Currency and Foreign Transactions Reporting Act,

(F) any act which is indictable under the Immigration and Nationality Act, section 274 (relating to bringing in and harboring certain aliens), section 277 (relating to aiding or assisting certain aliens to enter the United States), or section 278 (relating to importation of alien for immoral purpose) if the act indictable under such section of such Act was committed for the purpose of financial gain, or

(G) any act that is indictable under any provision listed in section 2332(g)(5)(B).

Appendix B

A "barred person" is (1) any member or associate of any La Cosa Nostra crime family or any other criminal group, or (2) any person who has been prohibited from participating in Union affairs. An officer, representative, employee or member of the ILA, District or Local Union is prohibited from knowingly aiding, abetting or assisting a "barred person" from participating in Union affairs.

An officer, representative, or employee is also prohibited from knowingly associating with racketeers. A racketeer is a member or associate of an organized crime family within the organized crime syndicate known as La Cosa Nostra or any other organized criminal group. A person "knowingly associates" with a racketeer if the person makes a calculated choice to associate with the racketeer despite knowing the racketeer's involvement with organized criminal activities.

This Code prohibits knowing association with racketeers. A person can knowingly associate only if that person knows that the individual with whom the person associates is a racketeer. Knowledge need not be absolute certainty. Public media sources may be an adequate source of knowledge that an individual is a racketeer. Members in doubt regarding whether a person is a racketeer should make a confidential inquiry of the Ethical Practices Counsel's Office.

The prohibition is against the association with racketeers, not the purpose or end result of the association. No criminal or improper purpose for the contact is required. The prohibition is aimed at the perception of others that racketeers have influence on Union affairs. For example, childhood friendships that extend into adulthood are prohibited even if they are limited to socializing at parties, weddings, and funerals, etc, if the contacts with the racketeer are on-going and deliberate.

The contact with the racketeer must be a conscious, calculated choice. It must be more than a fleeting or casual encounter, such as an unplanned, isolated instance of being at the same social event. On the other hand, a prohibited association may be just one planned contact with a racketeer, such as a prison visit or a small dinner meeting. Knowingly permitting racketeers access to the Union hall or Union events is prohibited. Seeking or utilizing the assistance of a racketeer to obtain Union membership or to obtain employment with the Union is also prohibited, as is hiring, admitting to the Union, or assigning Union work to an individual at the request or suggestion of, or to curry favor with, a racketeer.

Likewise, knowingly conducting non-Union business with a racketeer, even if the business is lawful, is prohibited. For example, installing a new floor and cabinets for racketeers or preparing their income tax returns is prohibited, as is using racketeers to perform non-Union business. There are only two (2) exceptions to the prohibition against knowing association with racketeers: (1) necessary, legitimate Union business and (2) purely social relations with immediate family members. The first exception may apply when a racketeer owns, represents, or is employed by a company whose employees are represented by the Union. Contacts that occur only as the necessary result of the ordinary, lawful conduct of Union business are permissible, but such contacts should extend no farther than necessary. The business contact should not extend to a social contact because of the possible perception of others that the racketeer or barred person has impermissible influence. A member must refuse a social invitation from a racketeer even if the member conducts Union-related business with the racketeer. Moreover, a member who has contacts with a racketeer permitted by this exception is encouraged to confidentially inform the ILA Ethical Practices Counsel's Office about the contact. Even though the contact is permitted, the contact poses dangers to the Union and the member; if the Ethical Practices Counsel is alerted to the contact, it can provide a measure of protection. The prohibition against "knowingly associating" does not include (a) a Union member, representative or official meeting or communicating with a "barred person" who is an employer to discuss the negotiation, execution or management of a collective bargaining agreement, or a labor dispute, when the Union member, representative or official represents, or seeks to represent, or would admit to membership the employees of that employer; (b) a Union member, representative or official meeting or communicating with a "barred person" who is a representative of a labor organization to discuss Union matters; (c) a Union member, representative or official meeting or communicating with an officer, employee or member of the ILA and its affiliated entities; and (d) a Union member, representative or official meeting or communicating with a relative by blood or marriage solely for social purposes. The

second exception, the one for family relationships, is very limited. Maintaining a relationship with a racketeer who is a member of one's immediate family is permissible if it is limited to lawful, social interactions that do not relate to Union affairs. As used in this paragraph, the term "relative" shall mean a lineal descendent, stepchild, ancestor, sibling, spouse or child of a lineal descendent, stepchild, ancestor, or sibling.

**INTERNATIONAL LONGSHOREMEN'S
ASSOCIATION, AFL-CIO CODE OF ETHICS
ACKNOWLEDGMENT FORM**

I acknowledge that I have received a copy of the ILA Code of Ethics, and that it is my responsibility to read and comply with its contents.

I further acknowledge that I have been informed of the Hotline number for reporting and any and all violations of the Code of Ethics to the Ethical Practices Counsel.

If I have any questions or suggestions regarding this Code of Ethics, I will immediately bring them to the attention of the Ethical Practices Counsel of the ILA.

SIGNATURE

DATE

NAME (Typed or Printed)