

Form 28

Conflict Disclosure and Independent Decision

During sole-member governance, a disinterested adult may receive limited transaction-review authority without becoming a Circle member.

Interested person and role

Transaction and material relationship or benefit

Disclosure and supporting facts

Disinterested reviewer and delegation

Comparisons alternatives and mission purpose

Recusal and actual approval authority

Decision amount limits and reasons

Reviewer signature and date

Permanent record reference

Record reference _____ Attachments _____