

Municipalities Continuing Disclosure Cooperation Initiative

As you may know, recently, the SEC Enforcement Division launched the Municipalities Continuing Disclosure Cooperation Initiative. The Initiative provides standardized settlement terms for issuers and underwriters in the municipal bond market who self-report violations of disclosure obligations before September 10, 2014. Specifically, the SEC is looking for materially inaccurate statements in final official statements regarding prior compliance with continuing disclosure obligations.

We know this is a confusing issue. Although it is related to your annual continuing disclosure requirements, this Initiative is completely separate and specifically related to representations that were made at the time debt was issued in the official statement. It is important for you to understand, as an issuer, whether your agency may have made such a statement and to take advantage of this self-reporting window if necessary.

What is important for you, as a municipal issuer, is to determine whether an error existed, then evaluate whether self-reporting the error to the SEC is necessary, and if so completing the self-disclosure. If you believe an inaccurate statement exists in one or more of your agency's official statements we may be able to direct you to finding resources available to help.

[What is Continuing Disclosure?](#)