

(Translation)

(Letterhead of the Office of Hon James To Kun Sun
Member of the Legislative Council)

26 August 2004

Mr Ricky C C FUNG, JP
Secretary General
Legislative Council Secretariat
Legislative Council Building
8 Jackson Road
Central
Hong Kong

本文件只為譯本，
登記事項以原文為準。
This is a translated version only;
please refer to the original version
for an authentic record of registered items.

Dear Mr FUNG,

Registration Form on Members' Interests

I have received the letter dated August 23 from the Secretariat. My reply to the relevant questions is as follows:

1. With regard to the issue concerning the shareholders of the Target Link Ltd., a property holding company, it has all along been my understanding that the company had issued two shares only, each of which (i.e. 50% of the shareholding) owned respectively by me and Mr Stanley NG Wing-fai, another member of the Democratic Party. Moreover, at that time, I had already transferred my one share (i.e. 50% of the shareholding), to the Democratic Party in the form of a trust.

According to Note (b) under the item "Shareholdings" in the declaration form:

- * *"Shareholdings" is defined as personal shareholdings and do not include shareholdings held by a Member in the capacity of a nominee shareholder.*

And according to Note (c):

- * *It is the obligation of a Member to register interests under this category within his knowledge.*

Out of my knowledge and understanding in the past, all along I considered that I was just holding one share, i.e. 50% of the shareholding, of Target Link in the capacity of a "nominee shareholder" rather than holding it physically. Moreover, I am not a remunerated director of the company and have never obtained any substantial benefits from it. For the abovementioned reasons, I did not make any declaration to the Legislative Council (LegCo) regarding the shareholding concerned.

Later it came to my knowledge that the number of shares issued by the company was in fact 100 and my 50% shareholding should be equivalent to 50 shares. After transferring one share to the Democratic Party, I still hold 49 shares. This shareholding is more than one per cent of the shares of the company, and hence subject to declaration to the LegCo.

In view of the above misunderstanding, I would like to make a belated declaration to the LegCo concerning my shareholding in the company. The declaration form is attached.

2. I do not have any control of the above company nor have more than 50% shareholding in it.

Yours sincerely,

(signed)

(James TO Kun-sun)

Encl.: Registration Form on Members' Interests

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Name of Member: James TO Kun-sun

Registrable Interest

Shareholdings

8. Do you have (either yourself or with or on behalf of your spouse or dependent children) interests in shareholdings in any public or private company which have a **nominal** value greater than 1 per cent of the issued share capital of the company?

YES/NO

If so, please list each company, indicating in each case the nature of its business.

Target Link Ltd. (匯標有限公司)

(a property holding company)

(I have held its shareholdings since 1 July 1998.)

- Notes:
- (a) There is no need to register the size, or value of the shareholdings.
 - (b) "Shareholdings" is defined as personal shareholdings and do not include shareholdings held by a Member in the capacity of a nominee shareholder.
 - (c) It is the obligation of a Member to register interests under this category within his knowledge.
 - (d) Shareholdings held by a Member's spouse are not registrable unless such holdings are within the knowledge of the Member, and are held by the Member "with or on behalf of" his spouse. This guideline is equally applicable to shareholdings in respect of a Member's infant children.

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Signature: _____ (signed)

Date: _____ 25-8-2004

Name of Member: James TO Kun-sun

Registrable Interest

Overseas Visits

5. Have you or your spouse made any overseas visits relating to or in any way arising out of your membership of the Legislative Council where the cost of the visit was not wholly borne by yourself or by public funds of Hong Kong?

YES/NO

If so, please provide the following details :

Dates of Visit & Countries Visited	Purpose of Visit & Name(s) of Sponsor(s)	Nature of Interest Received
11-3-2004 to 14-3-2004 Taiwan	Delegation organized by the Democratic Party to observe the presidential election in Taiwan Hong Kong and Macau Association, Republic of China	Accommodation

- Notes:
- (a) A Member is expected to make the necessary enquiries of his spouse in order to make a return on the registration of interests relating to overseas visits.
 - (b) Under "Nature of Interest Received" please specify whether the interest relates to the provision of passage, accommodation, and/or subsistence allowance.
 - (c) "Overseas visits" is interpreted to include all visits outside Hong Kong.
 - (d) An interest under this category should be registered within fourteen days of the conclusion of the visit.

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Signature: _____ (signed)
Date: _____ 22-3-2004

Name of Member: James TO Kun-sun

Registrable Interest

Overseas Visits

5. Have you or your spouse made any overseas visits relating to or in any way arising out of your membership of the Legislative Council where the cost of the visit was not wholly borne by yourself or by public funds of Hong Kong?

YES/NO

If so, please provide the following details :

Dates of Visit & Countries Visited	Purpose of Visit & Name(s) of Sponsor(s)	Nature of Interest Received
<p>16/8/2003 to 17/8/2003</p> <p>Taiwan</p>	<p>Participating in the International Conference on Hong Kong Under "One Country, Two Systems" organized by the Taiwan Advocates</p>	<p>Air tickets</p>

- Notes:
- (a) A Member is expected to make the necessary enquiries of his spouse in order to make a return on the registration of interests relating to overseas visits.
 - (b) Under "Nature of Interest Received" please specify whether the interest relates to the provision of passage, accommodation, and/or subsistence allowance.
 - (c) "Overseas visits" is interpreted to include all visits outside Hong Kong.
 - (d) An interest under this category should be registered within fourteen days of the conclusion of the visit.

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Signature: _____ (signed)

Date: _____ 10-2-2004

Name of Member: James TO Kun-sun

Registrable Interest

Overseas Visits

5. Have you or your spouse made any overseas visits relating to or in any way arising out of your membership of the Legislative Council where the cost of the visit was not wholly borne by yourself or by public funds of Hong Kong?

YES/NO

If so, please provide the following details :

Dates of Visit & Countries Visited	Purpose of Visit & Name(s) of Sponsor(s)	Nature of Interest Received
8/12/2003 to 19/12/2003 Belgium and France	Participating in the "European Union Visitors Programme" organized by the European Union	Air tickets

- Notes:
- (a) A Member is expected to make the necessary enquiries of his spouse in order to make a return on the registration of interests relating to overseas visits.
 - (b) Under "Nature of Interest Received" please specify whether the interest relates to the provision of passage, accommodation, and/or subsistence allowance.
 - (c) "Overseas visits" is interpreted to include all visits outside Hong Kong.
 - (d) An interest under this category should be registered within fourteen days of the conclusion of the visit.

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Signature: _____ (signed)

Date: _____ 4-2-04