



*The Commonwealth of Massachusetts*  
*Department of the State Treasurer*  
*State House*  
*Boston, Massachusetts 02133*

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STATE ETHICS COMMISSION  
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*Steven Grossman*  
*Treasurer and Receiver General*

July 23, 2012

State Ethics Commission  
One Ashburton Place, Room 619  
Boston, MA 02108

RE: G.L. Chapter 268A § 6A and § 23(B)(3)

Dear Ethics Commission:

Prior to being elected Treasurer and Receiver-General of the Commonwealth of Massachusetts, for 35 years I served as CEO of Grossman Marketing Group (“GMG”), a Subchapter S corporation of which I own approximately 60% of the non-voting stock. GMG is a full-service provider of marketing communications materials and promotional products and has many clients in the legal business, financial services and various other fields. Before taking office as Treasurer, I withdrew from my leadership role with GMG, and no longer have any role in managing the company. Given the nature of GMG’s business – the printing of commercial printing and promotional products, including signage and envelopes, and related design services – hundreds of businesses have purchased GMG’s products and services. With hundreds of clients, these client relationships can range from quite small to very significant business for GMG.

During my tenure as Treasurer, some former and current GMG clients are likely to interact with the Office of the State Treasurer (“Treasury”) or with other public entities with which the Treasurer, by statute, is required to interact. Notably, however, the services or materials purchased from GMG are entirely unrelated to any services or functions for which the Office of the State Treasurer is responsible. Since I began serving as Treasurer and Receiver-General of the Commonwealth of January 19, 2011, I have submitted several disclosures and recusals based on past GMG business relationships and will continue to diligently monitor matters in the event that further actions are necessary. To that end, and in order to dispel any appearance of a potential conflict of interest occasioned by the facts set forth below, that I may be improperly or unduly influenced in the performance of my official duties, or that I would be likely to act or fail to act as a result of kinship, rank, position or the undue influence of any party or person, I make this disclosure pursuant to G.L. c. 268A, §6A and §23(b)(3).

The Treasury has issued a Request for Responses (“RFR”) to select multiple companies to provide core fixed income investment management services to the Deferred

Compensation Plan of the Commonwealth. I have been informed that the procurement management team ("PMT") has met and developed recommendations for companies to select for these services. As Treasurer, I generally review and approve the recommendations of a PMT for procurements issued by Treasury. I have also learned that J.P. Morgan Chase, a current and potentially significant client of GMG, which I previously disclosed in past letters to the Commission, including my July 22, 2011 letter, has submitted a proposal in response to this RFR. In order to dispel any appearance of a potential conflict of interest occasioned by my prior business relationship with this GMG client, I am formally disclosing this matter pursuant to M.G.L. c. 268A, §23 (b)(3). I do not believe at this time that I will be unable to act impartially or will be unduly influenced by these prior or current relationships in my role as Treasurer in the course of this process. However, if at any time I determine that a potential conflict of interest has emerged, then, pursuant to G.L. c. 268A §6, I will take further action to recuse myself.

As discussed above, during my 35 years as CEO of GMG, GMG has provided its products and services to hundreds of clients. Consequently, this letter, along with previous filings with the State Ethics Commission, represents a diligent and good-faith attempt to publicly disclose GMG clients and significant Treasury business that may intersect and, out of an abundance of caution, recuse myself when appropriate. Going forward, I will continue to monitor Treasury business and will take any and all additional steps required by G.L. Chapter 268A and consistent with my continuing commitment to transparency.



Steven Grossman  
Treasurer and Receiver General

Cc: David Lynch  
Nicola Favorito  
Jamey Tesler