

The Commonwealth of Massachusetts Massachusetts Gaming Commission

84 State Street, Suite 720 Boston, Massachusetts 02109

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www.mass.gov/gaming

STEPHEN P. CROSBY

COMMISIONERS

GAYLE CAMERON
JAMES F. McHugh
BRUCE W. STEBBINS
ENRIQUE ZUNIGA

June 6, 2012

The Honorable Steven Grossman Office of the State Treasurer State House, Room 227 Boston, MA 02133

Dear Treasurer Grossman:

As part of its organizational process, the Massachusetts Gaming Commission is about to consider adoption of a variety of personnel policies, including policies that deal with vacations, sick leave, insurance, benefits and other common ingredients of a comprehensive personnel policy. In addition, pursuant to G.L. c. 23K, § 3(m), the Commission will soon begin work on a code of ethics that is more restrictive than the code contained in G.L. c. 268A and 268B. The more restrictive code may, among other things, impose restrictions on the financial affairs of Commissioners and Commission staff more stringent that those contained in existing law.

Although my duties as a Commissioner require me to participate in creation and promulgation of the personnel policies and ethics code just described, those policies and that code may affect my personal financial interests. If so, participation in the creation and promulgation process would amount to participation in a "particular matter" in which I have a financial interest. Therefore, pursuant to G.L. c. 268A, § 6, I am notifying you, as one of my three appointing authorities, of the issue and requesting that you make the determination § 6 requires. For that purpose, I am enclosing the form the State Ethics Commission has created for reporting like matters. I am sending a similar request to Governor Patrick and General Coakley.

I shall be happy to discuss with you or any member of your staff any questions you have regarding this matter. Thank you in advance for your assistance.

Sincerely, Roull Stellens

Bruce Stebbins

Commissioner

DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST AND DETERMINATION BY APPOINTING AUTHORITY AS REQUIRED BY G. L. c. 268A, § 63 E C E I V E D STATE ETHICS COMMISSION

	STATE EMPLOYEE INFORMATION
Name:	Bruce Stebbins
Title or Position:	Commissioner
State Agency:	Massachusetts Gaming Commission
Agency Address:	84 State Street, Suite 720 Boston, MA 02109
Office Phone:	617-979-9400
Office E-mail:	Bruce.stebbins@sate.ma.us
-	My duties require me to participate in a particular matter, and I may not participate because of a financial interest that I am disclosing here. I request a determination from my appointing authority about how I should proceed.
	PARTICULAR MATTER
Particular matter	Please describe the particular matter.
E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	Pursuant to Chapter 194 of the Acts of 2011 and G.L. c. 23K, the Massachusetts Gaming Commission (the "Commission") is authorized/or required to promulgate rules, regulations, policies, and procedures and to make determinations concerning the compensation and benefits provided to the Commission's employees, a code of ethics governing employees' activities and investments, the licensing and oversight of potential gaming establishments within the Commonwealth, the host and surrounding communities that may experience impacts from the development or operation of a gaming establishment.
Your required	Please describe the task you are required to perform with respect to the particular matter.
participation in the particular matter:	As a Commissioner, I and my fellow commissioners are charged with official responsibility for all matters within the Commission's jurisdiction, including the Particular Matters described above.
E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	
	FINANCIAL INTEREST IN THE PARTICULAR MATTER
Write an X by all that apply.	X I have a financial interest in the matter.
	My immediate family member has a financial interest in the matter.
	My business partner has a financial interest in the matter.
	I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter.
	I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.

Financial interest in the matter	Please explain the financial interest and include a dollar amount if you know it.
in the matter	Within the scope of my Required Participation in the Particular Matters described above, I will be required to participate in operational and regulatory determinations that will or may affect my reasonably foreseeable financial interests or those of my immediate family. Specifically, the
	Commission will be developing employment policies and an enhanced code of ethics that may affect the financial interests of its employees, including the Commissioners, as to employee benefits, health and life insurance, vacation, retirement benefits, and permissible investments.
Employee signature:	Helle U. Stellens
Date:	06/7/12

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	Steven Grossman
Title or Position:	Treasurer and Receiver General
Agency/Department:	Office of the State Treasurer
Agency Address:	State House, Room 227 Boston, MA 02133
Office Phone:	617-367-6900
Office E-mail	jtesler@tre.state.ma.us
	DETERMINATION
Determination by appointing authority: Write an X	As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee. I am assigning the particular matter to another employee, or
by your selection.	I am assuming responsibility for the particular matter, or
	I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.
Appointing Authority signature:	- Ster Srom
Date:	6/25/12
Comment:	

Attach additional pages if necessary.

File copy with:
State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108