

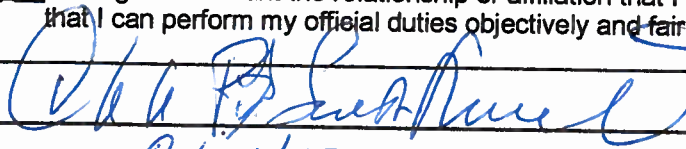
REVACED

20-12-16/2

**DISCLOSURE OF APPEARANCE OF CONFLICT OF INTEREST  
AS REQUIRED BY G. L. c. 268A, § 23(b)(3)**

RECEIVED  
STATE ETHICS COMMISSION

2012 MAR 22 AM 9:57

Name:	Charles B. Swartwood III
Title or Position:	Chairman
Agency/Department:	State Ethics Commission
Agency address:	1 Ashburton Place, Rm 619, Boston MA 02108
Office Phone:	(617) 371-9500
Office E-mail:	
	<p>I am expected to perform my official duties as a state employee, and I have a relationship or affiliation with a person or organization involved.</p> <p>I am filing this disclosure to dispel the appearance that the person or organization could unduly enjoy my favor or improperly influence me when I perform my official duties, or that I would be likely to act or fail to act as a result of kinship, rank, position or undue influence of any party or person.</p>
Describe the issue that is coming before you for decision or action.	In re PI No. 2011-20
What responsibility do you have for taking action or making a decision?	Decide whether to find reasonable cause to authorize adjudicatory proceedings
Describe your relationship or affiliation with someone involved.	One of the subjects in this matter is represented by the law firm of Clements & Pineault. I am acquainted with Ben Clements, who is one of the principals in that firm. Mr. Clements was formerly an Assistant United States Attorney and appeared in front of me in that position when I was a United States Magistrate Judge. I also had several telephone conversations with Mr. Clements, who at the time was serving as Counsel to the Governor, at the time of my appointment to the Ethics Commission.
Optional: Facts indicating there is no need for concern about undue favoritism or improper influence.	I know Mr. Clements professionally but not personally. The subject represented by Clements & Pineault is represented not by Mr. Clements but by his partner, Mr. Pineault.
Write an X to confirm this statement.	<input checked="" type="checkbox"/> Taking into account the relationship or affiliation that I have disclosed above, I feel that I can perform my official duties objectively and fairly.
Employee signature:	
Date:	3/21/12

STAFF DISCLOSURES MAY BE CONFIDENTIAL

DO NOT RELEASE THEM UNLESS  
EXECUTIVE DIRECTOR OR GENERAL  
COUNSEL REVIEWS AND APPROVES RELEASE

Attach additional pages if necessary.

Not elected to your public position – file with your appointing authority.

**Elected state or county employees – file with the State Ethics Commission.**

**Members of the General Court – file with the House or Senate clerk or the State Ethics Commission.**

**Elected municipal employee – file with the City Clerk or Town Clerk.**

**Elected regional school committee member – file with the clerk or secretary of the committee.**

**REDACTED**