


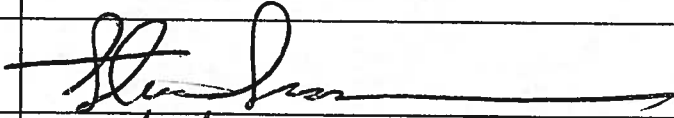
**DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST  
AND DETERMINATION BY APPOINTING AUTHORITY  
AS REQUIRED BY G. L. c. 268A, § 6**

RECEIVED  
STATE ETHICS COMMISSION

	<b>STATE EMPLOYEE INFORMATION</b>
Name:	Al Gordon
Title or Position:	Deputy Treasurer, Director of Policy
State Agency:	Office of the State Treasurer and Receiver General
Agency Address:	One Ashburton Place, 12 <sup>th</sup> Floor Boston, MA 02108
Office Phone:	617.367.6900 ext. 614
Office E-mail:	agordon@tre.state.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.
	<b>PARTICULAR MATTER</b>
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.	Please describe the particular matter.  <b>*Please see attached letter for specific information.</b>
Your required participation in the particular matter:  E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	Please describe the task you are required to perform with respect to the particular matter.  <b>*Please see attached letter for specific information.</b>
	<b>FINANCIAL INTEREST IN THE PARTICULAR MATTER</b>
Write an X by all that apply.	<input checked="" type="checkbox"/> I have a financial interest in the matter. <input type="checkbox"/> My immediate family member has a financial interest in the matter. <input type="checkbox"/> My business partner has a financial interest in the matter. <input type="checkbox"/> I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. <input type="checkbox"/> 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.
	Please explain the financial interest and include a dollar amount if you know it.

Financial interest in the matter	*Please see attached letter for specific information.
Employee signature:	
Date:	5/21/13

### DETERMINATION BY APPOINTING OFFICIAL

	<b>APPOINTING AUTHORITY INFORMATION</b>
Name of Appointing Authority:	Steven Grossman
Title or Position:	State Treasurer and Receiver General
Agency/Department:	Office of the State Treasurer and Receiver General
Agency Address:	One Ashburton Place, 12 <sup>th</sup> Floor Boston, MA 02108
Office Phone:	617.367.6900 ext. 241
Office E-mail	sgrossman@tre.state.ma.us
	<b>DETERMINATION</b>
Determination by appointing authority:  Write an X by your selection.	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.  <input type="checkbox"/> I am assigning the particular matter to another employee, or <input type="checkbox"/> I am assuming responsibility for the particular matter, or <input checked="" type="checkbox"/> 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:	
Date:	5/21/13
Comment:	

Attach additional pages if necessary.

File copy with:

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

## Al Gordon

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E-Mail: [al@algordon.com](mailto:al@algordon.com) • Web: [www.algordon.com](http://www.algordon.com)

May 15, 2013

Steven Grossman  
Treasurer and Receiver General  
Commonwealth of Massachusetts  
State House, Room 227  
Boston, MA 02133

RE: G.L. Chapter 268A § 6

Dear Treasurer Grossman,

You have asked me to advise you on issues raised by SEIU and a member of the PRIM Board, Theresa McGoldrick, with respect to the possible acquisition of the Tribune Company, a major media concern, by the Koch Brothers. The proposed takeover deal has caused considerable dismay and opposition from the labor and progressive communities.

As I have told you, I was an employee of the Times Mirror Company, which subsequently merged into the Tribune organization. While to the best of my knowledge, I have cashed out all my pension holdings in the Times Mirror/Tribune plan, I continue to receive mailings from their pension managers, which suggests that I am in some way still on their books.

More important, I continue to participate as a former employee in Tribune Company life, long-term-care, and disability insurance plans. To the extent that any acquisition might have an impact on these benefit programs, I believe I should disclose to you that there is a possibility that it could be perceived that I have some financial stake in the Tribune's possible future course.

Out of an abundance of caution given the potential contentiousness of the Tribune issue I am formally recusing myself from any involvement in this particular matter pursuant to §6 of Chapter 268A pending your review of the matter. Until a further determination by you, I will not participate in any discussions with you or any other staff at Treasury or PRIM regarding this investment issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'Al Gordon', written in a cursive style.

Al Gordon

Cc: Ethics Commission  
Jamey Tesler, General Counsel  
Jessie Saintcy, Assistant Treasurer for Human Resources  
Kathryn Burton, Chief of Staff  
James MacDonald, First Deputy Treasurer