

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

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STATE ETHICS COMMISSION
2014 OCT 16 AM 10:38

	STATE EMPLOYEE INFORMATION
Name:	Martin J Benison
Title or Position:	Comptroller of the Commonwealth
State Agency:	Office of the Comptroller
Agency Address:	Room 901 One Ashburton Place Boston Ma. , 02108
Office Phone:	671 973 2315
Office E-mail:	Martin.benison@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.
	PARTICULAR MATTER
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. As my term as Comptroller concludes January 8, 2015, I plan to discuss my future employment with various individuals. Some of these discussions will include conversations or meetings with people working for companies that are doing business with the Office of the Comptroller. Where my participation involves a particular matter, such as the review or approval of a contract, that may or will likely have an impact on that company's financial interest, I want to make required disclosures under section 6 of Chapter 268A, See attached memo.
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. See attached memo.
	FINANCIAL INTEREST IN THE PARTICULAR MATTER
Write an X by all that apply.	☐ 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. See attached memo.
Employee signature:	<i>Mark J. Brewer</i>
Date:	10-14-14

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	The Honorable Deval Patrick
Title or Position:	Governor of the Commonwealth
Agency/Department:	Office of the Governor
Agency Address:	Room 360 State House Boston, MA. 02133
Office Phone:	
Office E-mail	
	DETERMINATION
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. ☒ I am assigning the particular matter to another employee, or ☐ 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:	<i>[Signature]</i>
Date:	15 October 2014
Comment:	I assign this particular matter to Deputy Comptroller and Chief Information Officer Chris Guido.

Attach additional pages if necessary.

File copy with:

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



The Commonwealth of Massachusetts
Office of the Comptroller
One Ashburton Place, Room 901
Boston, Massachusetts 02108

MARTIN J. BENISON
COMPTROLLER

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To: The Honorable Deval Patrick, Governor
(Attn) Kate Cook, Governor's Counsel

CC:

From: Martin Benison, Comptroller

Date: October 14, 2014

RE: G.L. c. 268A, s.6 Disclosure

This memo provides a fuller discussion of my disclosure to you and request for a decision from you in accordance with section 6 of chapter 268A.

My appointment as Comptroller expires with your term on January 8, 2015. It is an appropriate time for me to consider future job opportunities which will include seeking reappointment as Comptroller. There are conversations I may have with personnel from CGI that I believe require disclosure and your action under section 6 of chapter 268A

CGI is the manufacturer of the Commonwealth's financial management system, we call MMARS. My office frequently has, and does currently have, contracts with CGI for modifications or enhancement to this system. Deputy Comptroller Chris Guido normally negotiates contracts and approves invoices with my oversight. I understand that these contracts are particular matters and any involvement that may be required of me in either such negotiations or oversight of Mr. Guida would constitute participation.

It has come to my attention that CGI may have interest in adding a person to the team with skills similar to mine. I intend to reach out to them to discuss the possibility of future employment with CGI. I believe, therefore, that I will or may be negotiating for, or may have an arrangement concerning, future employment with, CGI. Consequentially, I will not participate in contract discussions or review of performance under the contract until I receive your decision.

While I appreciate that you may make a determination pursuant to section 6 authorizing me to participate in such particular matters, I would recommend, and prefer, that you delegate this authority to Deputy Comptroller and Chief Information Officer Chris Guido. I have full confidence in Mr. Guido's ability to handles these matters in a professional, fair and impartial manner.