



MARTHA COAKLEY
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

RECEIVED
ETHICS COMMISSION

2014 JUN 12 AM 9:19

(617) 727-2200
www.mass.gov/ago

State Ethics Commission
One Ashburton Place
Boston, MA 02108

June 10, 2014

Re: Disclosure under G.L. 268A, § 6(a)(3)

To Whom It May Concern:

This disclosure is made under G.L. c. 268A, § 6(a)(3).

The Office of the Attorney General (AGO) is involved in proceedings concerning insurance and financial services matters. Specifically, personnel assigned to the Public Protection and Advocacy Bureau/Insurance and Financial Services Division work on particular matters involving insurance and consumer-related issues such as educational loan servicing. AGO personnel themselves may have a financial interest in these matters as they, too, may be consumers that may be affected by the AGO's handling of these matters.

This office has determined that in general the financial interest of AGO PPAB/IFSD personnel in these matters is not so substantial as to be deemed likely to affect the integrity of the services which the commonwealth may expect from them.

Please consider this letter as an updated disclosure of a financial interest in future insurance and financial services-related matters concerning educational loan servicing.

Thank you.

Very truly yours,

Judy Zeprun Kalman
Deputy General Counsel



AGO PPAB/IFSD Personnel as of June 2014

**Tiffany Bartz
Monica Brookman
Rebecca Dutra
Burt Feinberg
Lydia French
Linda Freshman
Emily Garvey
Matthew Gendron
Brook Kellerman
Alex Klibaner
Aaron Lamb
Peter Leight
David Lin
Claire Masinton
John-Michael Pattesotti
Leslie Rogers
Jennifer Snow
Sarah Sunderman
Arwen Thoman
Sarah Tombley
Jenny Wojewoda**

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

2014 JUN 12 AM 9:19


Name:	STATE EMPLOYEES INFORMATION See attached list of personnel who work in the AGO Public Protection and Advocacy Bureau/Insurance and Financial Services Division (PPAB/IFSD) of the Attorney General's Public Protection & Advocacy Bureau (PPAB) who may have student loans.	
Title or Position:	AGO personnel assigned to the PPAB/IFSD.	
State Agency:	AGO	
Agency Address:	One Ashburton Place Boston, MA 02108	
Office Phone:	c/o General Counsel's Office 617.963.2018	
Office E-mail:	c/o Judy.Zeprun@state.ma.us	
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.	<p>Please describe the particular matter: As described in a previous disclosure on behalf of AGO/PPAB/IFSD staff, AGO PPAB/IFSD staff work on industry-wide investigation, litigation, and regulation of the consumer marketplace in a wide variety of areas, involving insurance, data privacy, and alleged data breaches.</p> <p>IFSD is now investigating a variety of student loan-related issues at a multistate and state level, including an investigation of a major educational loan servicer. IFSD has also been mediating consumer-related student loan issues stemming from its profit school investigation and will also be mediating/handling numerous consumer complaints that relate to other student loan-related issues.</p> <p>A significant number of IFSD staff have student loans that are either serviced, owned, or originated by the major educational loan servicer. The outcome the multistate and state specific investigative inquiries, all of which are focused on individuals with student loan repayment problems, will not have an individual effect on IFSD staff. If those investigations result in a change in practices etc. by the loan servicer, the impact on IFSD staff will be the same as the impact on tens of thousands of other MA residents. There is no specific recovery or individual discrete benefit that we anticipate will come to IFSD staffers who work on these matters that would in any way be different from the larger societal impact of the case. The outcome of the mediations, as well, in no way has an impact on the IFSD staff student loan obligations.</p>	
Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	<p>Please describe the task you are required to perform with respect to the particular matter:</p> <p>Analysis and investigation of student loan entities, servicing, and practices.</p>	
FINANCIAL INTEREST IN THE PARTICULAR MATTER		

Write an X by all that apply.	<input checked="" type="checkbox"/> We have a financial interest in the matter.
	<input checked="" type="checkbox"/> Our 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"/> We are 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"/> We are 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	<p>Please explain the financial interest and include a dollar amount if you know it.</p> <p>If the investigation results in a change in practices etc. by The loan servicer, the impact on IFSD staff will be the same as the impact on tens of thousands of other MA residents. There is no specific recovery or individual discrete benefit that we anticipate will come to IFSD staffers who work on these matters that would in any way be different from the larger societal impact of the case</p>
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Employee signature:	SEE ATTACHED LIST OF AGO PERSONNEL ASSIGNED TO PPAB/IFSD. This general disclosure is being submitted on their behalf by the Deputy General Counsel.
Date:	6/20/14

DETERMINATION BY APPOINTING OFFICIAL APPOINTING AUTHORITY INFORMATION	
Name of Appointing Authority:	Martha Coakley, Attorney General By: Judy Zeprun Kalman
Title or Position:	Deputy General Counsel
Agency/Department:	Office of the Attorney General
Agency Address:	One Ashburton Place Boston, MA 02108
Office Phone:	617.963.2018
Office E-mail:	Judy.zeprun@state.ma.us

DETERMINATION	
Determination by appointing authority: Write an X by your selection.	<p>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.</p> <p><input type="checkbox"/> I am assigning the particular matter to another employee, or</p> <p><input type="checkbox"/> I am assuming responsibility for the particular matter, or</p> <p><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.</p>
Appointing Authority signature:	
Date:	6/10/2014
Comment:	This disclosure supplements the disclosures filed 4/23/2012 and 7/24/12.

Attach additional pages if necessary. Send to General Counsel's Office for Determination.
GCO will send a copy of this disclosure to:
State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108.