

STATE
ETHICS
COMMISSION

MASSACHUSETTS

ANNUAL REPORT • FISCAL YEAR 1987

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This Report covers the activities of the Massachusetts State Ethics Commission during FY87. It is issued pursuant to the mandate of Section 2 (1) of Chapter 268B and is intended to serve as a guide to the responsibilities of the Commission and as a record of its major activities and decisions during FY87. Copies of the Annual Report provided to the Governor and General Court include a breakdown of the Commission's expenditures over the fiscal year.

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Introduction to the Commission

History

The State Ethics Commission was created by Chapter 210 of the Acts and Resolves of 1978. That statute revised and strengthened the existing conflict of interest law, Chapter 268A, provided for annual disclosure of private business associations and interests by certain public officials and employees, and empowered the new, independent State Ethics Commission to enforce the law with civil penalties and sanctions.

General Laws c. 268A has regulated the conduct of public officials and employees in Massachusetts since 1963. The law limits public employees in three ways:

- what they may do "on the job";
- what they may do "on the side"; and
- what they may do once they leave public sector employment.

It also sets the standards of conduct required of all individuals serving state, county and municipal government. The law articulates the basic premise that public employees owe undivided loyalty to the government which they serve. The central goal of the conflict law is to ensure that public servants act in the public interest rather than for private gain.

Mandate

The Commission is an independent, non-partisan agency which was established to:

- Serve as the primary civil enforcement agency for the conflict of interest and financial disclosure laws.
- Provide advice and information to public officials and employees; and
- Administer the financial disclosure law, which covers some 5,000 candidates, elected officials, and employees holding major policy-making positions in the legislative, executive and judicial branches of state and county government;

Membership

The State Ethics Commission consists of five members appointed to staggered terms of five years. The commissioners serve part-time, are paid on a *per diem* basis, and employ a full-time staff. Three members are selected by the Governor, one by the Secretary of State and one by the Attorney General. No more than three may be from the same political party.

During FY87, the members of the Commission were:

Colin S. Diver, Chairman
Associate Dean,
Boston University School of Law.

Joseph J. Basile, Jr.,
Associate Professor,
Western New England College,
School of Law.

Frances M. Burns, Vice-Chairman
Supervisor, Student Prosecutor Program,
Boston University School of Law.

Archie C. Epps,
Dean of Students, Harvard College.

Andrea W. Gargiulo,
Chairwoman, City of Boston Licensing
Board.

Joseph I. Mulligan, Jr.,
City of Boston Corporation Counsel.

Constance M. Sweeney,
named Superior Court Judge by
Governor Dukakis in September 1986.

Investigation and Enforcement

Introduction

The Commission may initiate a confidential inquiry into any alleged violation of the conflict of interest or financial disclosure law. Anyone may call, write or visit the Commission to make a complaint.

Complaints which do not suggest problems within the Commission's jurisdiction or which are clearly not worth pursuing are not opened. The remaining complaints are reviewed by the staff in a screening process. Many complaints involve situations which raise concerns under the conflict law but formal investigation and enforcement is not considered appropriate because of the nature of the violation or mitigating circumstances. In these cases, a private educational letter providing information to ensure future compliance with the law is sent to the subject of the complaint.

After the staff review, or screening, if the staff determines a case should be formally investigated, authorization is sought from the appointed Commissioners to conduct a formal investigation called a "Preliminary Inquiry." The staff investigates the matter and prepares a report of its findings for the Commission to consider. If the inquiry indicates that there is "no reasonable cause to believe" that either law (G.L. c. 268A or 268B) has been violated, the Commission terminates the inquiry confidentially. On the other hand, if "reasonable cause" is found, the Commission has a number of enforcement options:

1. The Commission may authorize the issuance of an Order to Show Cause. The Order serves as a formal complaint and initiates an adjudicatory hearing to determine whether a violation of the law has occurred. After the hearing is held, the Commission issues a Decision and Order deciding the case.
2. The Commission may, in its discretion, enter into a Disposition Agreement. A Disposition Agreement is a negotiated document in which the subject admits to having violated the law and agrees to pay a civil fine. The Commission has the authority to impose up to a \$2,000 fine for each violation of either G.L. c. 268A or 268B.
3. The Commission may authorize the issuance of a Public Enforcement Letter, with the subject's consent. A Public Enforcement Letter lays out the facts of the case and violations of law. The subject, however, does not have to admit to having violated the law or pay a civil fine due to mitigating factors.
4. The Commission may sue in Superior Court to recover any economic advantage gained by individuals or businesses in violation of the conflict law and may seek to recover up to three times that amount in additional damages.
5. The Commission may refer any matter to the Attorney General, a district attorney or the United States Attorney for criminal investigation and prosecution.

Short of finding reasonable cause, and in lieu thereof, the Commission may issue a confidential compliance letter to advise an individual of violations and to explain the consequences of future misconduct. The issuance of a compliance letter is limited to situations which do not involve willful misconduct, significant economic advantage or gain by the subject, significant economic loss to the commonwealth, the use of undue influence or confidential information, or the potential for serious impact on public confidence in government.

Review of FY87 Activities

Complaints

In FY87, 712 complaints were brought to the Commission for investigation. This represents approximately a 15% increase over the 612 complaints filed in FY86.

531 (about 75%) of the 712 complaints alleged violations by municipal officials or employees; another 135 involved people who work for the commonwealth; 34 complaints involved county officials; 4 involved private individuals or corporations; 2 involved federal employees not within the Commission's jurisdiction; and 6 complaints involved combinations of the above.

Of the 712 complaints, 405 came from private citizens or public officials, 78 were referrals from law enforcement or other state, county or municipal agencies or officials, 13 were generated by Commission staff members, 45 were drawn from information reported by the media, 26 were generated from staff review of financial disclosure forms and 145 were anonymous.

There were 58 complaints from FY86 which were not opened until FY87; therefore, the following statistics will reflect a total of 770 complaints acted on during FY87. The Commission responded as follows to these complaints:

- 314 complaints were closed because the complainant did not suggest sufficient facts within the Commission's jurisdiction;
- 268 cases were opened (i.e. put into "screening");
- 110 complaints were merged with other cases already opened because they alleged the same or additional violations by the same subject; and
- 78 complaints had not yet been acted upon as of June 30, 1987.

Screenings

In FY87 the staff closed 210 cases following informal staff screenings. Another 62 screenings led to a formal investigation. These screenings were based on complaints received during FY87 and FY86. As of June 30, 1987 there were 151 ongoing screenings.

Of the 210 cases closed after the screening:

- 32 cases involved no violation of the law;
- 82 cases were closed because there was not sufficient independent information to corroborate the facts set forth in the complaint; and
- 96 cases were closed because the situation was one in which a private educational letter seemed appropriate.

Formal Investigations

The Commission authorized a total of 62 formal inquiries in FY87. These inquiries were based on complaints received during FY87 and previous years.

Of those 62 inquiries:

- 7 involved alleged violations of the financial disclosure law by:
 - 6 state officials or employees; and
 - 1 county official;
- 55 involved alleged violations of the conflict of interest law by:
 - 41 municipal officials or employees;
 - 14 state officials or employees.

The staff *completed* 58 formal inquiries during FY87. These inquiries included investigations initiated during FY87 and previous years.

These 58 cases resulted in:

- 37 "reasonable cause" findings that the law had been violated (28 -- conflict law, 9 -- financial disclosure law);
- 4 "reasonable cause" findings that the conflict law had been violated but in lieu of authorizing adjudicatory hearings, the Commission issued Public Enforcement Letters.
- 6 Confidential Compliance Letters issued in lieu of finding "reasonable cause" (all conflict law);
- 9 "no reasonable cause" findings that the law had been violated (7 -- conflict law, 2 -- financial disclosure law); and
- 2 terminations without findings (conflict law).

Public Resolutions

In FY87 19 "reasonable cause" findings resulted in:

- 11 Disposition Agreements involving violations of the conflict law;
- 1 Disposition Agreement involving a violation of the financial disclosure law;
- 3 Public Enforcement Letters involving violations of the conflict law;
- 3 Decision and Orders involving a violation of the conflict law; and
- 1 Conflict of interest case was dismissed.

As of June 30, 1987 there were 18 public proceedings pending for which an Order to Show Cause had been issued after a reasonable cause finding. In addition, there were 5 reasonable cause findings which had not yet resulted in the release of a Disposition Agreement or the issuance of an Order to Show Cause; there was one Public Enforcement Letter which had not yet been released; and there was one enforcement case pending in Superior Court seeking to recover the economic advantage gained by a violation of the conflict of interest law.

Penalties

In FY87 the Commission assessed civil penalties totaling \$18,120 from 24 individuals who were found to have violated the conflict of interest or the financial disclosure law.

FY87 Enforcement Actions

In the Matter of Frederick B. Cronin, Jr.

(August 27, 1986)

The Commission issued a Public Enforcement Letter concluding that Frederick B. Cronin, Lynn city tax collector, violated the conflict law by hiring his brother as his assistant. Because Cronin did receive informal permission from the city council and the mayor to hire his brother, the Commission did not levy a fine in this case. Section 19 of the conflict law prohibits a municipal official from hiring an immediate family member.

In the Matters of Carl D. Pitaro, Francis M. Magliano, and James C. Mihos

(October 29, 1986)

In separate Disposition Agreements with the Commission, Brockton Mayor Carl Pitaro, Brockton Building Superintendent Francis Magliano and private Brockton resident James Mihos admitted to having violated the "gift" prohibition of the conflict law.

The officials violated Section 3 of the conflict law by accepting a weekend trip to Florida paid for by Mihos and a developer. The officials had taken the trip, with their wives, to look at hotel projects built by a company which was proposing a project for Brockton. Mihos, a private citizen, violated the law by paying for the officials' travel costs.

Section 3 of the conflict law prohibits public officials from accepting gifts of substantial value (\$50 or over) from anyone with whom they have official dealings; it is also illegal for anyone to offer or give such a gift.

Pitaro, Magliano and Mihos each paid a \$1,000 civil penalty for the violations. In addition, the city officials paid \$668 each (the cost of the Florida trip) as forfeiture of the economic advantage gained.

In the Matter of Erland S. Townsend, Jr.

(November 13, 1986)

In a Disposition Agreement with the Commission, former Conservation Commissioner Erland Townsend was fined \$1,000 for violating Section 17 of the conflict law by representing a development company before various town boards, including his own.

The conflict law prohibits municipal employees from acting as agent or attorney for a private party in relation to a particular matter in which the town has a direct and substantial interest.

In the Matter of Eugene LeBlanc

(December 30, 1986)

The Commission issued a Public Enforcement Letter concluding that Eugene LeBlanc, Nahant Building Inspector violated the conflict law by issuing permits for and inspecting the work of the construction company he owns and operates. Because the Board of Selectmen was aware at all times of LeBlanc's actions, the Commission did not levy a fine in this case. Section 19 prohibits a municipal employee from participating in a particular matter which affects his own financial interest.

In the Matter of Marjorie Goudreault

(January 29, 1987)

In a Disposition Agreement with the Commission, Haverhill City Councillor Marjorie Goudreault was fined \$500 for voting on a pay increase for her brother, the mayor, in violation of Section 19 of the conflict law.

Goudreault voted March 11, 1986 on a salary ordinance which listed proposed salaries for administrative and professional positions within city government, including the mayor's.

In the Matter of Patrick D. Farretta
(February 10, 1987)

The Commission issued a Public Enforcement Letter concluding that Boston Housing Inspector Patrick Farretta violated the conflict law by taking actions to relocate an elderly woman after her property was condemned by the city of Boston, introducing her to real estate agents (friends of Farretta) who were interested in purchasing her property and receiving \$100 from the woman to board up her property.

Section 17 of the conflict law prohibits municipal employees from acting as the agent for any private party in connection with a matter in which the city has an interest.

The Commission advised Farretta that Section 23 of the law may, in fact, preclude his association with any real estate business in Boston while he is employed as a Housing Inspector. The Commission mandated that Farretta seek formal advice in the future before acting as a real estate salesman in Boston or accepting any employment with a real estate company which does business in Boston.

In the Matter of Thomas J. Nolan
(March 6, 1987)

Chelsea Mayor Thomas J. Nolan was fined \$1,000 for appointing his brother, Robert Nolan, to the Chelsea Housing Authority in June 1986, in violation of Section 19 of the conflict law. As a result of the Commission's action, Robert Nolan resigned his position with the Housing Authority in January 1987.

In the Matter of Charles Lawrence
(March 6, 1987)

Mashpee Board of Health (BOH) member Charles Lawrence was fined \$4,000 for acting on official BOH matters that affected his employer, New Seabury Corporation.

Lawrence as a BOH member, reviewed and approved New Seabury's septic system designs for various developments at BOH meetings, as well as, voted on New Seabury variance requests and perc extensions. Lawrence also, on numerous occasions, personally inspected New Seabury septic systems, witnessed New Seabury perc tests and issued various official documents for New Seabury such as building permit applications.

These actions are violations of Section 19 of the conflict of interest law which prohibits a municipal official from acting on any matter that affects the financial interest of his employer.

In the Matter of Robert Lavoie
(March 18, 1987)

Saugus Selectman Robert Lavoie, in a Disposition Agreement with the Commission, was fined \$250 for voting to authorize the renewal of his family's liquor license in December 1985. Section 19 of the conflict law prohibits municipal officials from participating in any matter which affects their own or their immediate family's financial interest.

In the Matter of Ernest LaFlamme

(April 8, 1987)

In a Disposition Agreement with the Commission, Chicopee City Treasurer Ernest LaFlamme was fined a total of \$2,000 for violations of Section 19 of the conflict of interest law.

LaFlamme deposited and reinvested a substantial amount of money over 15 years in the Chicopee Cooperative Bank while sitting on the board of directors of the bank. Section 19 of the conflict law prohibits a municipal official from participating in any particular matter that affects the financial interest of a business organization for which he serves as director or which affects the financial interest of an immediate family member.

LaFlamme was also found in violation of the law by officially acting as the city's auctioneer and selling a parcel of city land to his brother—who was the highest and only bidder on the property.

In the Matter of Wendell Hopkins

(April 29, 1987)

Former Rowley Selectman Wendell Hopkins, in a Disposition Agreement with the Commission, was fined \$2,000 for advocating and voting for measures that would advance the installation of a water system on a road on which he owns substantial property. Section 19 prohibits a municipal employee from participating in a particular matter in which he has a personal financial interest.

In the Matter of Walter Johnson/Goddard Memorial Hospital

(May 26, 1987)

In Public Enforcement Letters sent to former Stoughton Selectman Walter Johnson and Goddard Memorial Hospital, the Commission concluded that Johnson and Goddard had violated the conflict law, but because Johnson had received inadequate legal advice from town counsel, the Commission decided not to order formal adjudicatory proceedings.

Johnson was found to have violated the conflict law on numerous occasions, between July 1984 and January 1986 by acting as Goddard's liaison with town boards and officials while serving as selectman. Goddard was found to have violated the law by compensating Johnson for his activities.

Section 17 of the conflict law prohibits municipal officials from representing the interests of private parties before town boards; it also prohibits private parties from compensating municipal officials in connection with matters pending before town boards.

Johnson was also found to have violated Section 18, which regulates the activities of former public officials in connection with his work for Goddard.

In the Matter of Frank Baj

(June 10, 1987)

Former Hadley Building Inspector Frank Baj was fined \$500 for issuing building permits for new construction work when he had been hired in his private capacity to do the work. Section 19 of the conflict law prohibits inspectors from inspecting their own work or from issuing permits for construction work which they have been hired privately to do.

In the Matter of Paul T. Hickson

(June 25, 1987)

The State Ethics Commission issued a Decision and Order concluding the Commission's case against Paul T. Hickson, Westfield city councillor and maintenance worker for the Westfield Housing Authority.

The Commission ordered Hickson to resign either his city councillor position or his job at the Westfield Housing Authority within 30 days and pay a \$500 fine to the Commission. The Commission said Hickson was in violation of Section 20 of the conflict law by holding the two paid city positions. The Commission stated Hickson did not qualify for any of the exemptions to Section 20. Hickson has appealed the Commission's decision to Superior Court. As this Annual Report went to print, a final decision had not been rendered by the Court. However, a bill became law which allows Housing Authority employees to hold elective office (other than mayor) in their town or city.

Advisory Opinions

Introduction

Individuals covered by the conflict of interest and financial disclosure laws are entitled to receive advice about whether their proposed activities are permissible under G.L. c. 268A or G.L. c.268B. State, county and municipal employees may submit a written request to the Commission for an advisory opinion. Most requests will be answered fully within three weeks, and all formal opinions of the Commission serve as a legal defense in subsequent proceedings concerning the requesting employee's conduct, unless the request omits or misstates material facts.

Although advisory opinions issued by the Commission are confidential, the Commission publishes summaries of recent advisory opinions and prepares public versions of the opinions with identifying information deleted. Copies of these opinions are available from the Commission.

Summary of FY87 Opinions

The Commission received 608 formal requests for advisory opinions during FY87. This represents a 50 percent increase over the 404 formal requests received in FY86. Thirty seven of the FY87 requests were answered with formal Commission advisory opinions; the remaining requests were handled through informal letters issued by the Commission's Legal Division. Among the topics addressed by the Commission's formal advisory opinions during FY87 were the following:

- when a financial interest is reasonably foreseeable for the purposes of abstention; See EC-COI-86-25; 87-1; 87-16; 87-21;
- standards under which individuals who perform services for a corporation which contracts with a public agency will be treated as public employees for G.L. c. 268A purposes; See, EC-COI-86-21; 87-8; 87-19;
- limitations which G.L. c. 268A places on the receipt by public employees of gifts of substantial value. See, EC-COI-86-14; 86-17; 87-7; and
- limitations which G.L. c. 268A places on public employees who have outside board of director memberships. See EC-COI-86-20; 87-5; 87-10; 87-13.

FY87 Commission Advisories

In FY87, the Commission published two advisories. Advisories respond to questions that arise in the context of a request for an advisory opinion or complaint on specific facts and circumstances, but have the potential for broad application. The advisories are reprinted in the BULLETIN, distributed to some 1900 subscribers.

Advisory No. 11 - Nepotism. This advisory explains to public officials and employees exactly what constitutes a "nepotism" violation and what the Commission's enforcement policy is regarding these violations. Issued December 15, 1986.

Advisory No. 12 - County Charter Commissions. This advisory provides guidelines for all members of county charter commissions and specifically deals with the restrictions the conflict law places on county employees who serve on county charter commissions (with an emphasis on county commissioners who serve *ex officio* on charter commissions). Authorized January 12, 1987.

Municipal Advisory Opinion Regulation

In April, 1986 the Commission formally adopted a regulation requiring all conflict of interest opinions issued by city or town counsel to be filed with the Commission for review. The regulation is intended to insure that opinions issued to municipal employees and officials are correct statements of the law, which the Commission will be bound by. The rule requires the Commission to be bound by all municipal opinions, unless the Commission notifies the city or town counsel within 30 days of any objections to the opinion.

The opinion will be binding on the Commission in any subsequent proceedings *only* with respect to the person who requested the opinion and those upon whose behalf he requested the opinion. The Commission will not be bound by municipal opinions if material facts were omitted or misstated by the person or if the person acted in bad faith in securing the opinions.

In FY87, the first full year of the regulation, the Commission reviewed 151 municipal opinions. The Commission staff concurred with 141 of the opinions and informed municipal lawyers in 10 instances that their advice was inconsistent with Commission decisions, and therefore, would not be binding on the Commission.

Legislation

Three bills affecting G.L. c. 268A and G.L. c. 268B were signed into law during FY87.

In November, 1986, the Legislature overrode a gubernatorial veto of a bill which permits members of the board of regents who are affiliated with private educational institutions to vote on matters affecting the financial interests of those institutions. See, Chapter 543 of the acts of 1986.

In December, 1986, the governor signed into law a bill making four changes to G.L. c. 268B, the financial disclosure law:

1. The amount of time public officials are permitted to serve without having to file an SFI increased from eight to 30 days.
2. The amount of time public officials have to submit their SFI's after beginning employment increased from 10 to 30 days;
3. All newly elected officials must now file an SFI for the year preceding the one in which they took office; and
4. The law adjusted the dollar categories relating to the reporting of income, property value and loans; it retained the top category of "greater than \$100,000."

See Chapter 693 of the acts of 1986.

In April, 1987, the governor enacted a corrective bill which restored to the Commission enforcement jurisdiction which had been inadvertently affected by a drafting error in an unrelated 1986 law.

See, Chapter 9 of the acts of 1987.

Financial Disclosure

Introduction

When the financial disclosure law was enacted in 1978, Massachusetts became the 41st state to require certain public employees and elected officials to disclose certain information concerning their private financial interests. Chapter 268B requires annual disclosure of interests and associations which might give rise to conflict or the appearance of conflict between a person's public responsibilities and his private interests. The law covers all elected officials, all candidates and certain designated employees of state and county government. Municipal officials and employees are not included among those covered by the disclosure requirements of chapter 268B, although certain employees and officials of the city of Marlboro are required to file as a result of the enactment of H. 5916, a home rule petition passed in 1983.

SFI Filings for FY87

Designations

Every candidate for state or county office, and every elected state or county official, must file an annual Statement of Financial Interests (SFI) for the preceding calendar year with the State Ethics Commission. In addition, certain state and county employees who hold "major policy-making positions" must file. In order to determine which state and county employees should be required to file, the Commission requests that by the first of each year, the administrative head of each state and county agency submit a "designation list" of individuals holding major policy-making positions within his or her department. By January 1, 1987, the Commission had received lists from over 200 heads of state and county agencies requiring SFI filing by a total of 4397 public employees and elected officials.

Staff Inspection of SFI's - Action Toward Compliance

Failure to file on time, or to amend a deficient or incomplete Statement within 10 days of receipt of a Formal Notice of Delinquency, is a violation of c. 268B. The Commission may levy penalties, including fines of up to \$2,000 for each violation. The statute also provides criminal penalties of fines and imprisonment for filing a false Statement.

In FY87, all but 227 of 4397 designated public employees and elected officials (over 95 percent) filed on time. This is a slightly higher percentage than in FY86 when 290 of the 4300 designated filers missed the deadline. The high rate of compliance can be attributed to the Commission's continued practice of: mailing the Statements early in March 1987; sending a special letter to individuals who had left state service during the year reminding them of their obligation to file; sending reminder cards to all those who had not yet filed by April 15, 1987; and imposing stiff civil penalties on those who in the past failed to file on time.

This year, formal Notices of Delinquency were mailed to the 227 individuals (187 appointed employees and 40 elected officials) who missed the May deadlines. Of the 227, only 19 individuals failed to file in a timely manner. Of the 19 individuals who failed to file within 10 days of receipt of a Formal Notice:

1. The Commission authorized seven preliminary inquiries, which are in the process of being resolved;
2. Eleven individuals filed shortly after their 10-day grace period expired, incurring fines of less than \$100;
3. One individual did not formally respond to the Notice of Delinquency, but filed her SFI.

Chapter 268B provides that any individual who submits a written request to the Commission may inspect and purchase a copy of any Statement filed with the Commission. In FY87, the Commission honored requests from 225 different sources, including requests from private citizens, journalists and representatives of law enforcement agencies. This represents an increase over 170 sources in FY86. In all, Statements of 1300 filers were reviewed by persons making such requests, the bulk of them in May, June and July just following the Commission's receipt of Statements filed for calendar year 1986. This represents an increase over the 956 filers whose SFI's were distributed in FY86.

Education, Assistance and Review

Throughout the year, Commission staff is available to assist filers in completing their Statements. The Commission also reviews each SFI filed to determine completeness, consistency with prior years' filings, possible conflict-of-interest violations and compliance with the Financial Disclosure Law. In FY87 1200 filers were required to amend their Statements. The majority of the amendments were the result of misunderstanding of the SFI instructions and were relatively minor in nature.

However, the Commission has been increasingly concerned with the number of mistakes resulting from carelessness, especially on behalf of those filers who make the same mistake year after year.

In FY88, the Commission plans to address this issue by informing filers that by filing a negligent or carelessly completed Statement they risk incurring a civil penalty.

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