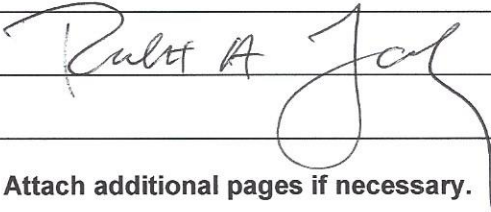


**DISCLOSURE OF APPEARANCE OF CONFLICT OF INTEREST
AS REQUIRED BY G. L. c. 268A, § 23(b)(3)**

PUBLIC EMPLOYEE INFORMATION	
Name of public employee:	Robert A. Landry
Title or Position:	Selectman, Town of Andover
Agency/Department:	Board of Selectmen
Agency address:	36 Bartlet Street, Andover MA 01810
Office Phone:	978-623-8200
Office E-mail:	rlandry@andoverma.gov
	<p><i>In my capacity as a state, county or municipal employee, I am expected to take certain actions in the performance of my official duties. Under the circumstances, a reasonable person could conclude that a person or organization could unduly enjoy my favor or improperly influence me when I perform my official duties, or that I am likely to act or fail to act as a result of kinship, rank, position or undue influence of a party or person.</i></p> <p><i>I am filing this disclosure to disclose the facts about this relationship or affiliation and to dispel the appearance of a conflict of interest.</i></p>
APPEARANCE OF FAVORITISM OR INFLUENCE	
Describe the issue that is coming before you for action or decision.	The town's group health insurance is one of the town's largest expenses. This issue comes before the Board of Selectmen several times per year especially during the annual renewal process and the budget preparation period.
What responsibility do you have for taking action or making a decision?	In my capacity as a member of the Board of Selectmen, I will be deliberating with the other board members on the town's group health insurance plan options and making recommendations on both plan and insurer selection to the Town Manager.
Explain your relationship or affiliation to the person or organization.	In my profession, I am the sole owner of my insurance brokerage firm. I am not employed by any insurance company and I have no other employees. All of my clients are private-sector companies, based primarily in Massachusetts. As a broker, I have worked with and/or currently work with the following insurance companies: Blue Cross, Tufts Health Plan, Harvard Pilgrim, Fallon Health Plan, Neighborhood Health Plan, CIGNA, United, Anthem, Minuteman Health, Delta Dental, Hartford Life, MetLife, Principal, UNUM, Reliance Standard, AFLAC, John Hancock, Lincoln Financial, American Fidelity, and VSP. As a benefits broker, I provide benefits brokerage services to my clients. While my role is to serve the needs of my clients and to negotiate on their behalf, it is the insurance companies that pay commissions/bonuses directly to brokers in the group health insurance market.
How do your official actions or decision matter to the person or organization?	The Board of Selectmen set policy for the town and provide direction to the Town Manager on financial matters including the Town's health insurance plans. The Town pays millions of dollars in health insurance premiums to the insurance company that is selected.

<p>Optional: Additional facts – e.g., why there is a low risk of undue favoritism or improper influence.</p>	<p>First, I have never had and will never have any financial interest, whatsoever, in any of the Town of Andover's insurance plans including health insurance.</p> <p>Second, I will not benefit financially in any way, directly or indirectly, by the Town's decision to choose an insurance company with which I have private business dealings.</p> <p>The objective of this disclosure is to dispel the appearance of a conflict of interest. In my case, a reasonable person, may perceive a conflict of interest in the following way. Suppose I influence the vote of the board with a recommendation that the Town of Andover change its group health plan from say Blue Cross Blue Shield to Tufts Health Plan. There could be a perception that I am somehow garnering favor with the selected insurer and receiving some form of personal financial gain through my business because the same insurers compensate me for the business I place with them through my private brokerage business.</p> <p>While I recognize that possible perception may exist, the reality is that there is no such opportunity for personal gain. The compensation I receive from each insurer is based solely on the clients I have placed with them. I receive only standard commissions from all insurers. There is no subjective aspect to how insurers pay brokers, it is purely driven by the published commission/compensation schedules for each insurer.</p> <p>Also, if one argued that I may garner favor from the selected insurer, then by that logic, I would be losing favor with the other insurers where I also have business.</p> <p>I have no financial interest in the Town of Andover's health insurance plans and I do not do business with any other municipality or government agency.</p>
<p>If you cannot confirm this statement, you should recuse yourself.</p>	<p>WRITE AN X TO CONFIRM THE STATEMENT BELOW.</p> <p><input checked="" type="checkbox"/> Taking into account the facts that I have disclosed above, I feel that I can perform my official duties objectively and fairly.</p>
<p>Employee signature:</p>	
<p>Date:</p>	<p>April 6, 2015</p>

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.