

State of Connecticut



KATHARINE L. WADE
INSURANCE COMMISSIONER

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Hartford

September 15, 2016

Citizen's Ethics Advisory Board
c/o Charles F. Chiusano, Chair
CT Office of State Ethics
18-20 Trinity St., 2nd Floor
Hartford, CT 06106

Re: Proposed Declaratory Ruling No. 2016-A

Dear Chair Chiusano and Members of the Citizen's Ethics Advisory Board:

Prior to my appointment on March 20, 2015, I sought advice of the Office State Ethics ("OSE") to ensure that I could carry out the duties of the office of Insurance Commissioner in conformance with the Code of Ethics for Public Officials.

Based upon guidance received from the OSE on February 20, 2015, I took steps to ensure that there would not be a conflict of interest under the code of ethics. I documented these steps with a written statement of facts and proceedings given under oath pursuant to General Statutes § 1-86, dated September 23, 2015. In the statement I explained why there was no conflict of interest. There were no changes in facts and circumstances until July 20, 2016, when the U.S. Department of Justice announced it was filing a lawsuit with regard to Anthem's proposed merger.

Shortly thereafter, the DOJ filed suit seeking an injunction to prohibit the planned acquisition or any other transaction that would combine the two companies. The Connecticut Insurance Department suspended consideration of Anthem's Form A application seeking control of the Connecticut domiciled insurance subsidiaries of Cigna Corp. Thus, the consummation of an Anthem-Cigna merger is speculative at this time.

There is important work being done every day to protect the insurance consumers of Connecticut. The continued mischaracterization of my role and the steps I have taken to avoid any conflict have been highly politicized. This controversy created unwarranted and unfair distractions for the Department, despite no conflict of interest. It is for these reasons, should the federal lawsuit be resolved and the merger proceedings resume including the Department review, I will recuse myself from the Anthem Form A application.

Very truly yours,

A handwritten signature in blue ink that reads "Katharine L. Wade".

Katharine L. Wade
Commissioner

cc: Carol Carson, Executive Director, CT Office of State Ethics
Legal Division, CT Office of State Ethics, c/o Attorney Barbara Housen