

From: [Michele Jacklin](#)
To: [OSE](#)
Subject: Declaratory Ruling Bo. 2016 A
Date: Wednesday, July 06, 2016 6:23:13 PM

To the Office of State Ethics:

As a former reporter and columnist who covered state government and politics for The Hartford Courant for roughly 25 years, I feel compelled to say that the involvement of Insurance Commissioner Katherine Wade in the proposed Anthem/Cigna merger doesn't pass the sniff test. Although I wrote about many appearances of conflicts of interest over the years, rarely have I seen a case that is so clear-cut and blatant.

I know that others -- including Cheri Quickmire of Common Cause Connecticut and state Comptroller Kevin Lembo -- have brought certain facts to your attention, I believe several of them bear repeating. Wade is a former lobbyist for Cigna and her husband currently works for Cigna. Thus, the outcome of the merger, which would make the new entity the largest health insurance company in the United States, could have a direct bearing on the finances of Wade's family. In addition, one of Wade's top deputies, who left the agency in January, is a former Cigna employee and another Cigna employee served as the Insurance Department's legal counsel in reviewing the merger plan.

As if that's not enough, Wade's father-in-law, James A. Wade, is one of the state Democratic Party's top power brokers, and has been since the administration of the late governor, William A. O'Neill. James Wade is a partner in a law firm that counts Cigna as a client and he is a major fundraiser for the state Democratic Party. He has also helped raise nearly \$1 million in campaign contributions for the Democratic Governors Association, of which Connecticut Gov. Dannel Malloy is chairman. Malloy appointed Ms. Wade to her current position.

There are so many entangling alliances here that it's almost laughable that Wade has not seen fit to recuse herself from this multi-billion dollar case or that Malloy has not asked her to step aside. It would appear that in this situation, politics and cash trump ethics.

Moreover, the *International Business Times*, on June 27, 2016, highlighted instances where Wade was less than forthright with ethics officials. The *Times* obtained emails purporting to show that in February, "Wade told ethics officials that she had no Cigna business before her, even though her agency was then leading the national multi-state review of the company's merger plan -- and even though Wade had repeatedly met with the company's representatives."

Can this woman be trusted? Should she be trusted to deal with this merger in an unbiased way? Those questions need not be answered. The simple and obvious solution is for Wade to recuse herself. There is no question in my mind and in the views of many top political leaders, news organizations and good-government groups that Wade should be ordered to recuse herself from this incredibly important decision-making process.

I urge the Office of State Ethics to act accordingly. Thank you.

Sincerely,
Michele Jacklin
460 Tall Timbers Road

Glastonbury, CT 06033