



NORTH CAROLINA

State Board of Elections & Ethics Enforcement

Mailing Address:
P.O. Box 27255
Raleigh, NC 27611-7255

Phone: (919) 814-0700
Fax: (919) 715-0135

October 10, 2018

The Honorable Dale R. Folwell
State Treasurer of North Carolina
3200 Atlantic Avenue
Raleigh, NC 27604

Via Email

**Re: Evaluation of Statement of Economic Interest Filed by Mr. Wilbur T. Brinn, Jr.
Treasurer Appointed Member– State Health Plan Board**

Dear Treasurer Folwell:

Our office has received Wilbur T. Brinn, Jr.'s 2017 Statement of Economic Interest and 2018 No Change Form as a treasurer appointed member of the **State Health Plan for Teachers and State Employees Board of Trustees (the "Board")**. We have reviewed it for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes ("N.C.G.S."), also known as the Elections and Ethics Enforcement Act (the "Act").

Compliance with the Act and avoidance of conflicts of interest in the performance of public duties are the responsibilities of every covered person, regardless of this letter's contents. This letter, meanwhile, is not meant to impugn the integrity of the covered person in any way. This letter is required by N.C.G.S. § 163A-193(a) and is designed to educate the covered person as to potential issues that could merit particular attention. Advice on compliance with the Act is available to certain public servants and legislative employees under N.C.G.S. § 163A-157.

We did not find an actual conflict of interest, but found the potential for a conflict of interest. The potential conflict identified does not prohibit service on this entity.

The State Health Plan insures more than 663,000 state employees, teachers, retirees, current and former lawmakers, state university and community college personnel, state hospital staff and their dependents. The State Health Plan Board of Trustees ("the Board") is statutorily charged with approving the benefits programs, premium rates, co-pays, deductibles, coinsurance maximums, and large contracts for the Plan. The Board also oversees administrative reviews and appeals and is charged with developing and maintaining a strategic plan.

The Act establishes ethical standards for certain public servants, including conflict of interest standards. N.C.G.S. § 163A-211 prohibits public servants from using their positions for their financial benefit or for the benefit of a member of their extended family or a business with which they are associated. N.C.G.S. § 163A-216 prohibits public servants from participating in certain official actions from which the public servant, his or her client(s), a member of the public servant's extended family, or a business or non-profit with which the public servant or a member of the public servant's immediate family is associated may receive a reasonably foreseeable financial benefit.

Mr. Brinn fills the role of a treasurer appointed member on the Board. He has disclosed that his spouse is a self-employed contractor that provides medical record scanning services. As such, Mr. Brinn has a potential for a conflict of interest and should exercise appropriate caution in the performance of his public duties should issues relating to his spouse's business, or her colleagues come before the Board for official action or otherwise seek to conduct business with the Board.

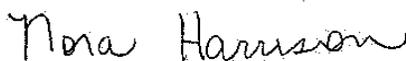
In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

Pursuant to N.C.G.S. § 163A-159(c), when an actual or potential conflict of interest is cited by the Board under N.C.G.S. § 163A-189(e) with regard to a public servant sitting on a board, the conflict shall be recorded in the minutes of the applicable board and duly brought to the attention of the membership by the board's chair as often as necessary to remind all members of the conflict and to help ensure compliance with the Act.

Finally, the Act mandates that all public servants attend an ethics and lobbying education presentation. N.C.G.S. § 163A-158. Please review the attached document for additional information concerning this requirement.

Please contact our office if you have any questions concerning our evaluation or the ethical standards governing public servants under the Act.

Sincerely,



Nora Harrison
NC Board of Elections & Ethics Enforcement

cc: Mr. Wilbur T. Brinn, Jr., Filer
Ms. Laura Rowe, Ethics Liaison

Attachment: Ethics Education Flyer



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State Board of Elections & Ethics Enforcement

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October 11, 2018

The Honorable Tim Moore
Speaker of the House of Representatives
16 W. Jones Street, Room 2304
Raleigh, NC 27601-1096

Via Email

Re: Evaluation of Statement of Economic Interest Filed by Mr. Peter W. Chauncey
Expert in Health Economics – State Health Plan Board

Dear Speaker Moore:

Our office has received Peter W. Chauncey's 2018 Statement of Economic Interest as a member of the **State Health Plan for Teachers and State Employees Board of Trustees ("the Board")**. We have reviewed it for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes ("N.C.G.S."), also known as the Elections and Ethics Enforcement Act (the "Act").

Compliance with the Act and avoidance of conflicts of interest in the performance of public duties are the responsibilities of every covered person, regardless of this letter's contents. This letter, meanwhile, is not meant to impugn the integrity of the covered person in any way. This letter is required by N.C.G.S. § 163A-193(a) and is designed to educate the covered person as to potential issues that could merit particular attention. Advice on compliance with the Act is available to certain public servants and legislative employees under N.C.G.S. § 163A-157.

We did not find an actual conflict of interest, but found the potential for a conflict of interest. The potential conflict identified does not prohibit service on this entity.

The State Health Plan insures more than 663,000 state employees, teachers, retirees, current and former lawmakers, state university and community college personnel, state hospital staff and their dependents. The State Health Plan Board of Trustees ("the Board") is statutorily charged with approving the benefits programs, premium rates, co-pays, deductibles, coinsurance maximums, and large contracts for the Plan. The Board also oversees administrative reviews and appeals and is charged with developing and maintaining a strategic plan.

The Act establishes ethical standards for certain public servants, including conflict of interest standards. N.C.G.S. § 163A-211 prohibits public servants from using their positions for their financial benefit or for the benefit of a member of their extended family or a business with which they are associated. N.C.G.S. § 163A-216 prohibits public servants from participating in certain official actions from which the public servant, his or her client(s), a member of the public servant's extended family, or a business or non-profit with which the public servant or a member of the public servant's immediate family is associated may receive a reasonably foreseeable financial benefit.

Mr. Chauncey fills the role of an Expert in Health Economics on the Board. He is the Principal of PWC Solutions, LLC, a company that provides consulting and management services in health care and wealth management. He is also a consultant for Carolina Complete Health Network, a physician-led health plan that provides Medicaid Services in North Carolina, a board member for WKCC, LLC which is an accountable care organization established to enhance the quality and coordination of health care and a director for Prevention Partners, a nonprofit health/wellness organization. Additionally, he has a financial interest in the following companies which are related to the health care industry: Ventas Inc., A real estate investment company which handles health care real estate, Aetna, a health insurance company, Abbott Laboratories, a health care and pharmaceutical company, Patient Pay, a company that provides billing statements for health care companies and medical providers, and Hatteras Venture Partners, a venture capital company which provides funding to healthcare businesses. Hatteras Venture Partners also owns security or equity interest in GI Therapeutics Inc., a biopharmaceutical company and Clearside Biomedical, a biopharmaceutical company. With such business, financial and employment interests, he has the potential for a conflict of interest and should exercise appropriate caution in the performance of his public duties should any of his employment or business interests, or any entity in which he holds a financial interest come before the Board for official action, or otherwise seek to conduct business with the Board.

In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

Pursuant to N.C.G.S. § 163A-159(c), when an actual or potential conflict of interest is cited by the Board under N.C.G.S. § 163A-189(e) with regard to a public servant sitting on a board, the conflict shall be recorded in the minutes of the applicable board and duly brought to the attention of the membership by the board's chair as often as necessary to remind all members of the conflict and to help ensure compliance with the Act.

Finally, the Act mandates that all public servants attend an ethics and lobbying education presentation. N.C.G.S. § 163A-158. Please review the attached document for additional information concerning this requirement.

Please contact our office if you have any questions concerning our evaluation or the ethical standards governing public servants under the Act.

Sincerely,



Nora Harrison, Compliance Analyst
NC Board of Elections & Ethics Enforcement

cc: Mr. Peter W. Chauncey, Filer
Ms. Laura Rowe, Ethics Liaison

Attachment: Ethics Education Flyer



NORTH CAROLINA

State Board of Elections & Ethics Enforcement

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P.O. Box 27255
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August 28, 2018

The Honorable Roy A. Cooper, III
Governor of North Carolina
20301 Mail Service Center
Raleigh, NC 27699-0301

Via Email

**Re: Evaluation of Statement of Economic Interest Filed by James Wayne Fish
Prospective Appointee – State Health Plan**

Dear Governor Cooper:

Our office has received **Mr. James W. Fish's** 2018 Statement of Economic Interest as a prospective appointee to the **State Health Plan (the "Plan")**. We have reviewed it for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes ("N.C.G.S."), also known as the Elections and Ethics Enforcement Act (the "Act").

Compliance with the Act and avoidance of conflicts of interest in the performance of public duties are the responsibilities of every covered person, regardless of this letter's contents. This letter, meanwhile, is not meant to impugn the integrity of the covered person in any way. This letter is required by N.C.G.S. § 163A-193(a) and is designed to educate the covered person as to potential issues that could merit particular attention. Advice on compliance with the Act is available to certain public servants and legislative employees under N.C.G.S. § 163A-157.

We did not find an actual conflict of interest, but found the potential for a conflict of interest. The potential conflict identified does not prohibit service on this entity.

The State Health Plan insures more than 663,000 state employees, teachers, retirees, current and former lawmakers, state university and community college personnel, state hospital staff and their dependents. The Board is statutorily charged with approving the benefits programs, premium rates, co-pays, deductibles, coinsurance maximums, and large contracts for the Plan. The Board also oversees administrative reviews and appeals and is charged with developing and maintaining a strategic plan.

The Act establishes ethical standards for certain public servants, including conflict of interest standards. N.C.G.S. § 163A-211 prohibits public servants from using their positions for their financial benefit or for the benefit of a member of their extended family or a business with which they are associated. N.C.G.S. § 163A-216 prohibits public servants from participating in certain official actions from which the public servant, his or her client(s), a member of the public servant's extended family, or a business or non-profit with which the public servant or a member of the public servant's immediate family is associated may receive a reasonably foreseeable financial benefit.

Mr. Fish will fill the role of a At Large member on the Plan. He is a correctional food service manager with the Department of Public Safety and is currently insured by the State Health Plan that he will be administering. As such, he has the potential for a conflict of interest and should exercise appropriate caution in the performance of his public duties.

In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

Pursuant to N.C.G.S. § 163A-159(c), when an actual or potential conflict of interest is cited by the Board under N.C.G.S. § 163A-189(e) with regard to a public servant sitting on a board, the conflict shall be recorded in the minutes of the applicable board and duly brought to the attention of the membership by the board's chair as often as necessary to remind all members of the conflict and to help ensure compliance with the Act.

Finally, the Act mandates that all public servants attend an ethics and lobbying education presentation. N.C.G.S. § 163A-158. Please review the attached document for additional information concerning this requirement.

Please contact our office if you have any questions concerning our evaluation or the ethical standards governing public servants under the Act.

Sincerely,



Lisa Johnson, SEI Unit
NC Board of Elections & Ethics Enforcement

cc: James W. Fish

Attachment: Ethics Education Flyer



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State Board of Elections & Ethics Enforcement

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October 11, 2018

The Honorable Dale R. Folwell
State Treasurer of North Carolina
3200 Atlantic Avenue
Raleigh, NC 27604

Via Email

**Re: Evaluation of Statement of Economic Interest
State Health Plan Board**

Dear Mr. Folwell:

Our office has received your 2017 and 2018 Statement of Economic Interest as a member of the **State Health Plan for Teachers and State Employees Board of Trustees (the "Board")**. We have reviewed them for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes ("N.C.G.S."), also known as the Elections and Ethics Enforcement Act (the "Act").

Compliance with the Act and avoidance of conflicts of interest in the performance of public duties are the responsibilities of every covered person, regardless of this letter's contents. This letter, meanwhile, is not meant to impugn the integrity of the covered person in any way. This letter is required by N.C.G.S. § 163A-193(a) and is designed to educate the covered person as to potential issues that could merit particular attention. Advice on compliance with the Act is available to certain public servants and legislative employees under N.C.G.S. § 163A-157.

We did not find an actual conflict of interest, but found the potential for a conflict of interest. The potential conflict identified does not prohibit service on this entity.

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As the Treasurer for the State of North Carolina, you hold an ex-officio role on the Board. You disclosed that you and your spouse own stock in the publicly traded companies Valeant Pharma, a pharmaceutical company and Cynosure, a manufacturer and developer of aesthetic and medical treatment systems which may conduct business with the Board. Additionally, you are a state employee that is also covered under the state health plan that you will be administering. As such, you have a potential for a conflict of interest and should exercise appropriate caution in the performance of your public duties should any of the companies which you have a financial interest in come before the Board for official action or otherwise seeks to conduct business with the Board.

In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

Pursuant to N.C.G.S. § 163A-159(c), when an actual or potential conflict of interest is cited by the Board under N.C.G.S. § 163A-189(e) with regard to a public servant sitting on a board, the conflict shall be recorded in the minutes of the applicable board and duly brought to the attention of the membership by the board's chair as often as necessary to remind all members of the conflict and to help ensure compliance with the Act.

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Sincerely,



Nora Harrison
NC Board of Elections & Ethics Enforcement

cc: Ms. Laura Rowe, Ethics Liaison

Attachment: Ethics Education Flyer



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October 11, 2018

Mr. Charles E. Perusse
2921 Lauren Oaks Drive
Raleigh, NC 27616

Via Email

**Re: Evaluation of Statement of Economic Interest
State Budget Director, non-voting – NC State Health Plan**

Dear Mr. Perusse:

Our office has received your 2017 Statement of Economic Interest and 2018 no change form as a member of the **State Health Plan for Teachers and State Employees Board of Trustees (“the Board”)**. We have reviewed it for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes (“N.C.G.S.”), also known as the Elections and Ethics Enforcement Act (the “Act”).

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Mr. Charles E. Perusse
October 11, 2018
Page 2 of 2

As the State Budget Director of the Office of State Budget & Management you hold the position of the State Budget Director on the Board which is an ex-officio non-voting position. As a state employee you are also insured by the State Health Plan that you will be administering. As such, you have the potential for a conflict of interest and should exercise appropriate caution in the performance of your public duties.

In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

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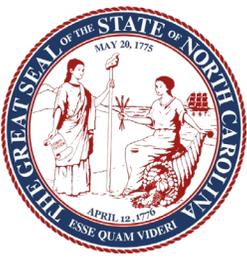
Sincerely,



Nora Harrison, Compliance Analyst
NC Board of Elections & Ethics Enforcement

cc: Ms. Laura Rowe, Ethics Liaison

Attachment: Ethics Education Flyer



NORTH CAROLINA

State Board of Elections & Ethics Enforcement

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October 9, 2018

The Honorable Dale R. Folwell
State Treasurer of North Carolina
3200 Atlantic Avenue
Raleigh, NC 27604

Via Email

**Re: Evaluation of Statement of Economic Interest Filed by Dr. Peter W. Robie
Health Benefits Medical Background Position – State Health Plan Board**

Dear Treasurer Folwell:

Our office has received Dr. Peter W. Robie's 2017 and 2018 Statement of Economic Interest as a member of the **State Health Plan for Teachers and State Employees Board of Trustees (the "Board")**. We have reviewed them for actual and potential conflicts of interest pursuant to Chapter 163A of the North Carolina General Statutes ("N.C.G.S."), also known as the Elections and Ethics Enforcement Act (the "Act").

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Dr. Robie fills the role of a health benefits and medical background position on the Board. He has disclosed that he is a physician and his spouse is a nurse midwife both employed by Wake Forest Baptist Health. Additionally, he has a financial interest in AbbVie, a pharmaceutical research and development company and Abbott Laboratories a pharmaceutical company. As such, Dr. Robie has a potential for a conflict of interest and should exercise appropriate caution in the performance of his public duties should issues relating to Wake Forest Baptist Health, his financial interests or his colleagues, come before the Board for official action or otherwise seek to conduct business with the Board.

In addition to the conflicts standards noted above, N.C.G.S. § 163A-212 prohibits public servants from accepting gifts, directly or indirectly (1) from anyone in return for being influenced in the discharge of their official responsibilities, (2) from a lobbyist or lobbyist principal, or (3) from a person or entity which is doing or seeking to do business with the public servant's agency, is regulated or controlled by the public servant's agency, or has particular financial interests that may be affected by the public servant's official actions. Exceptions to the gifts restrictions are set out in N.C.G.S. § 163A-212(e).

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Sincerely,



Nora Harrison
NC Board of Elections & Ethics Enforcement

cc: Dr. Peter W. Robie, Filer
Ms. Laura Rowe, Ethics Liaison

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