



**DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST
AND DETERMINATION BY APPOINTING AUTHORITY
AS REQUIRED BY G. L. c. 268A, § 6**

Name: Glenn Kaplan	
Title or Position: Asst Atty General	
State Agency: Attorney General's Office	
Agency Address: One Ashburton Place Boston, MA 02108	
Office Phone: 617-784-8327	
Office E-mail: Glenn.kaplan@mass.gov	
PARTICULAR MATTER	
Particular matter E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	Please describe the particular matter: Review of Class Action Settlement per 28 USC 1715. See below.
Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	Please describe the task you are required to perform with respect to the particular matter: Review of proposed class action settlement in a securities litigation, sharing conclusions internally within the AGO, and possibly providing feedback to court via an amicus letter regarding aspects of proposed settlement between class and defendant.
FINANCIAL INTEREST IN THE PARTICULAR MATTER	
Write an X by all that apply.	☒ ☐ I have a (de minimus) financial interest in the matter. ☐ ☐ My immediate family member has a financial interest in the matter. ☐ ☐ My business partner has a financial interest in the matter. ☐ I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. ☐ I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.

Financial interest in the matter	I own a fraction of a single share of stock in the defendant, with the total value of the investment being less than two dollars. I may be a class member in this case, along
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Attach additional pages if necessary. Send to General Counsel's Office for Determination.
GCO will send a copy of this disclosure to:
State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108

	with what are likely hundreds of thousands (or millions) of other shareholders. Based on the information provided regarding the settlement, I believe I would be entitled to less than ten cents (and probably less than a penny), if the settlement were approved and I submitted a claim as part of the class. I do not believe I have a material financial interest, and am filing this out of an abundance of caution. If our Office submits criticisms of the settlement, and this leads the court to reject the settlement, this could mean that I would lose what I might have been entitled to recover had the settlement gone forward. Analogously, if the AGO were to seek changes to the claim or opt-out mechanisms proposed in the case, these changes might make it easier for me to either put in a claim for this limited money or to opt-out of the matter. Under the current planned procedures, it appears that opting-out would cost me the value of a single postage stamp (opt-outs are mailed into the court). Such an interest, if there is one, is not so substantial as to be likely to affect the integrity of the services which the Commonwealth may expect from me.
Employee signature:	/s/ Glenn Kaplan
Date:	6/2/2026

DETERMINATION BY APPOINTING OFFICIAL APPOINTING AUTHORITY INFORMATION	
Name of Appointing Authority:	Andrea Joy Campbell, Attorney General
Title or Position:	By: Meryum Khan General Counsel
Agency/Department:	Office of the Attorney General
Agency Address:	One Ashburton Place Boston, MA 02108
Office Phone:	617-963-2432
Office E-mail:	Meryum.khan@mass.gov
DETERMINATION	
Determination by appointing authority: Write an X by your selection.	As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee. ☐ I am assigning the particular matter to another employee, or ☐ I am assuming responsibility for the particular matter, or ☒ I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.
Appointing Authority Signature:	
Date:	6/5/26
Comment:	

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