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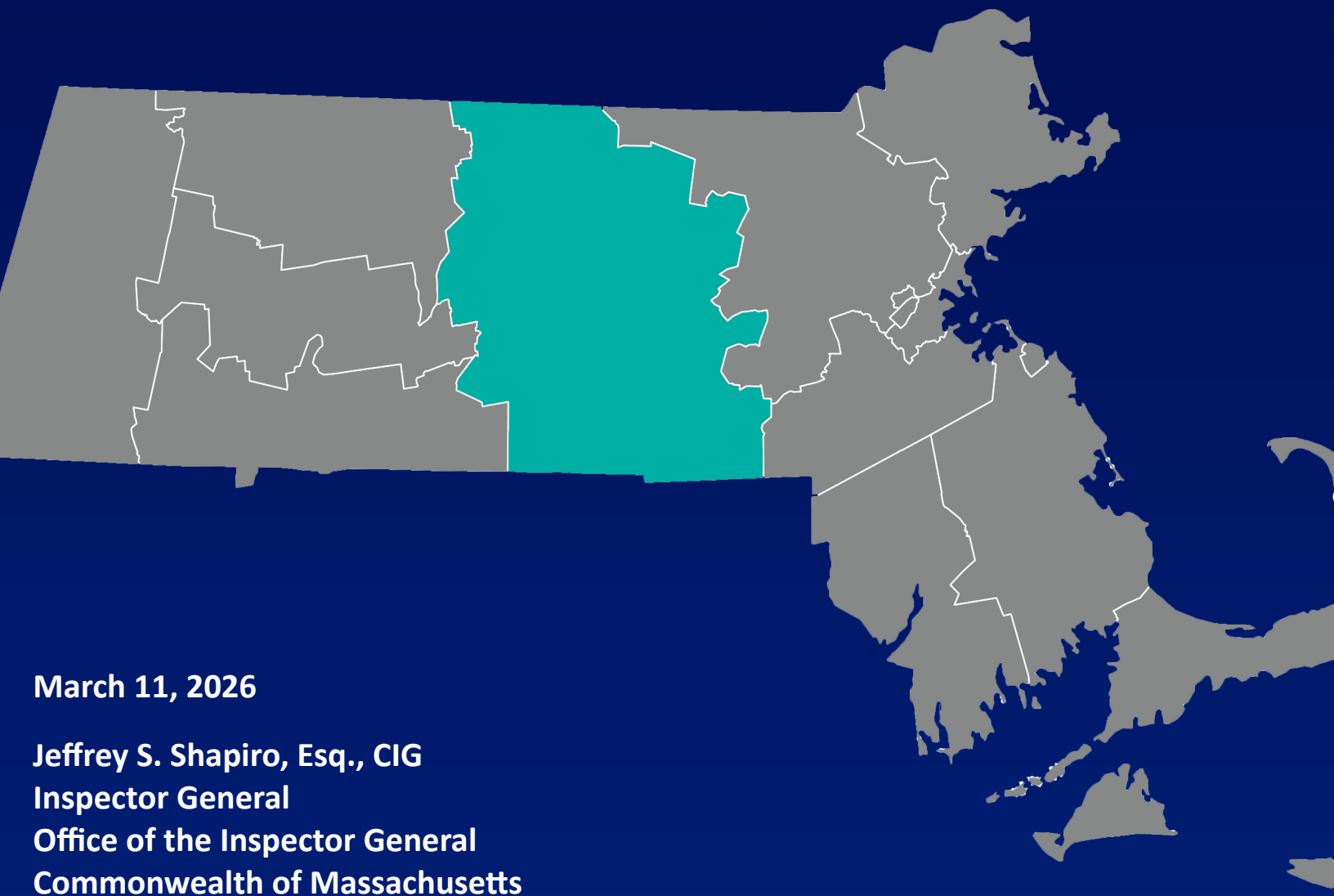
Former CEO of Worcester Regional Retirement System Abused Public Funds



March 11, 2026

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March 11, 2026

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Re: Former CEO of Worcester Regional Retirement System Abused Public Funds

Dear Commonwealth Leaders and Mr. Sacco:

As the leader of an independent agency with a mandate to investigate allegations of fraud, waste, and abuse of state and municipal resources, I am often asked, "For whom does the Inspector General work?" Generally speaking, the Office of the Inspector General (OIG) works to make government work better tomorrow than it does today on behalf of the people of the Commonwealth. And more specifically, the OIG has recently worked for the Worcester Regional Retirement System (WRRS), which is comprised of retirees, contributing members, and governmental entities throughout Worcester County. Together they are in a trusted relationship that forms the foundation for how public employee retirement systems work within the Commonwealth.

As the OIG investigation described in these pages shows, that trust was severely undermined by former WRRS Chief Executive Officer (CEO) Michael Sacco, whose ambition overshadowed his responsibilities to WRRS, its Board of Directors (Board), and, most importantly, its members.

The OIG investigation found that, despite verbal assurances to the contrary, Sacco continued to operate and in fact grew his private law practice while serving as the full-time CEO of the WRRS. When the WRRS Board hired Sacco as its CEO, the Board was clear in its expectations that Sacco was to work full time in the office exclusively for WRRS during its business hours, with the understanding that he would "wind down" his private practice and not seek new clients. While his contract did not spell out exact language concerning Sacco's outside work, it was understood that such work would not "substantially interfere" with his duties for WRRS and that any absences for outside work would be reported to the Board.

Instead, in continuing to represent 53 other retirement boards, Sacco appeared at 350 meetings of other boards, handled court and administrative hearings, took phone calls, sent emails, and attended virtual meetings on behalf of his outside clients, most during WRRS business hours and often from his WRRS office. Meanwhile, at WRRS, Sacco eliminated regular staff meetings, failed to produce a single membership newsletter, curtailed outreach meetings with town officials, member workshops and seminars, and did not attend quarterly investment committee meetings.

The Board that hired, managed, and ultimately allowed Mr. Sacco to resign, rather than being fired, fell short on many of their responsibilities, especially in awarding two $5,000 merit bonuses under a mistaken belief that such payment would limit Sacco's outside legal work and in not ensuring that outside work reports were regularly filed and reviewed. When the Board's concerns over how to limit or control Sacco's outside legal activities were reduced from a contract clause to a verbal understanding, they should have walked away from the arrangement. When the Board allowed the less restrictive terms of the contract to prevail based upon Sacco's verbal assurances, they had an even higher responsibility to monitor his conduct. This was the period when the Board had an obligation to closely scrutinize his work performance and habits. Had the Board done so, they would and should have found what the OIG ultimately uncovered through this investigation.

The OIG encourages the WRRS, the Public Employee Retirement Administration Commission (PERAC), and the public retirement systems that have employed Sacco to review this report to determine if their public retirees may be at risk due to the actions detailed in this report.

Lastly, the findings of this report, along with other OIG reports, letters, and advisories underscore concerns that the OIG has regarding the public employee retirement systems generally. The OIG recommends that the Legislature study whether there might be a better way to mitigate such risks incurred by the fact that the Commonwealth and its public entities have 104 public retirement systems and that post-retirement earnings cannot be easily tracked for compliance with the law.

This report is issued with my appreciation for the dedicated professionals within the OIG who make meaningful and impactful investigations such as this one possible. I am humbled and

honored to work with these individuals who are committed to making government work better tomorrow than it worked today.

Sincerely,

Jeffrey S. Shapiro, Esq., CIG
Inspector General

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EXECUTIVE SUMMARY

The Office of the Inspector General (OIG) conducted an investigation of Michael Sacco's (Sacco) work practices during his tenure as chief executive officer (CEO) of the Worcester Regional Retirement System (WRRS). The OIG initiated this review in 2023 after receiving an anonymous complaint alleging Sacco was working extensively for other retirement boards during WRRS business hours and using his public office and public resources to perform legal services for his private law practice's clients.

WRRS, created in 1937, administers the contributory retirement benefit plan under Chapter 32 of the Massachusetts General Laws for employees of 100 government entities in Worcester County. It is governed by a five-member board of trustees (Board), with each Board member having a fiduciary obligation to act in the system members' best interests and to safeguard the system's assets.

In 2019, the Board hired Sacco, who previously provided legal services to the Board, as the WRRS CEO. The Board signed an employment agreement with Sacco that lacked well-defined limits on his outside work activities. At the time, the Board knew that Sacco provided legal services to 53 other Massachusetts public employee retirement boards. As extensively documented, the Board wanted Sacco to work full time in the office, exclusively doing WRRS work during its business hours. The Board's members were apprehensive about Sacco's ability to manage the WRRS office while also representing his other clients, fearing that his other clients would compete for his time. Despite initial efforts by the Board to have Sacco end his outside engagements by setting restrictions in his contract terms, Sacco refused these terms, suggesting – through verbal representations to the Board rather than in writing – that he would wind down his practice, "not seek new clients," and restrict his work for outside clients to hours before and after WRRS business hours and prioritize WRRS as his primary interest. Although Sacco verbally promised to sharply curtail his work for private clients when he became the WRRS CEO, the contract's language did not place explicit boundaries on when, where, and how Sacco could work for outside clients. It did require that outside work "not substantially interfere with the performance of his duties," and, if such work required him to be absent from the office, that he "disclose such engagements to the Board on a monthly basis."

The OIG found that Sacco violated his duties to WRRS and the public. For example, the OIG found that Sacco:

- Attended over 350 retirement board meetings, court sessions, administrative hearings and other engagements on behalf of his private clients. Nearly all of these appearances occurred during WRRS business hours, for which he was paid to be the full-time CEO.
- Communicated regularly by phone and email with retirement board directors, court officials, and other attorneys about his outside clients' cases during WRRS business hours, and often from WRRS's office.
- Failed to comply with his contractual requirement to inform the Board monthly of his non-WRRS work appearances and engagements.

- Neglected some of his CEO responsibilities. For example, Sacco canceled regular staff meetings, failed to produce WRRS's membership newsletter for two years, and was months late in delivering a cybersecurity report which the Board requested.
- Did not use vacation time on at least 16 days when he was traveling to or in Florida on vacation.
- Failed to disclose investigations and litigation against him as he sought new clients, as was required under the terms of many RFPs that he responded to on behalf of his private firm.

With respect to the Board, the OIG finds that it failed to act prudently in contracting with Sacco or monitoring his activities as CEO. The contract negotiated by the Board did not specify Sacco's work hours, the amount of outside work he could perform, prohibitions on using WRRS's office for non-WRRS purposes, or the date by which he was to stop working for outside clients. Further, the Board did not properly monitor Sacco's attendance or respond effectively to his extensive absences and failures to perform certain CEO duties. During Sacco's first year as CEO, staff privately informed Board members about his frequent absences and his participation in videoconferences with other clients from WRRS's office. Meeting minutes documenting Sacco's attendance at other boards' meetings were publicly available. However, the Board never invoked Sacco's obligation to report his absences at its monthly meetings. Moreover, the Board granted Sacco $5,000 merit bonuses in 2021 and 2022, the maximum allowed by his contract, which Sacco regarded as permission to be absent at will.

In this report, the OIG makes critical recommendations to WRRS, including that it claw back ill-gotten gains by Sacco, strengthen the language of future contracts to better define specific limits regarding outside employment and the use of public resources, and establish more effective oversight of future CEO activity to ensure that such abuses are curtailed going forward. Additionally, based on its findings and recommendations that the WRRS and the Public Employee Retirement Administration Commission (PERAC) investigate this matter further, the OIG believes that Sacco may owe funds to WRRS. Furthermore, the OIG recommends that PERAC cooperate with the Board to determine if Sacco's creditable service should be recalculated to reduce his length-of-service calculations in light of facts uncovered by this investigation.

BACKGROUND

I. The Office of the Inspector General

The Office of the Inspector General (OIG) is an independent state agency charged with preventing and detecting fraud, waste, and abuse of public funds and assets. The OIG investigates allegations of fraud and waste at all levels of government, works to prevent the misuse of public funds, and reviews programs and practices in state agencies and municipalities to identify systemic vulnerabilities and opportunities for improvement. The OIG strives to enhance public confidence in government, ensure accountability, and promote the best interests of the people of the Commonwealth in the use of public funds and property.

The Legislature established the OIG in 1980 as the first state-level inspector general's office in the country. Today, the OIG oversees more than $120 billion in spending and the work of over 300,000 public employees across all state and local public entities throughout the Commonwealth.

II. Scope of Investigation; Methodology

The OIG received an anonymous complaint on June 16, 2023 alleging that during the time that Michael Sacco served as the CEO of the Worcester Regional Retirement System (WRRS), he routinely performed work for his private law practice during normal business hours in WRRS's public office using public resources. The letter stated that Sacco was often absent from the office and submitted false timesheets claiming to work 9 a.m. to 4 p.m. every business day. Newspaper articles contained similar allegations about Sacco's work habits.

In its ensuing investigation, the OIG reviewed Sacco's invoices to the 54 other public retirement boards that he provided legal services to while he was the WRRS CEO. The invoices showed itemized entries for legal services, including appearances at board meetings, court sessions, administrative hearings, and other matters Sacco handled for his law firm's non-WRRS clients. The OIG also reviewed the other retirement boards' meeting minutes showing the dates, times, and length of board meetings that Sacco attended. The OIG additionally reviewed draft and final versions of Sacco's employment contract, records of Sacco's use of vacation, sick, personal, and other forms of leave, and metadata from Sacco's emails to non-WRRS boards. Furthermore, the OIG interviewed Sacco, all of WRRS's Board members who served during Sacco's tenure, employees who worked for WRRS during Sacco's tenure, and more than 10 administrators or board chairs of Sacco's other retirement board clients.

III. Worcester Regional Retirement System

WRRS is one of the state's largest contributory retirement systems for public employees, with approximately 14,000 active and retired members across 100 municipalities, housing authorities, regional school districts, and other governmental units. WRRS's member units are spread across a wide area of central Massachusetts, between the Quabbin Reservoir and suburbs east of Interstate 495, and between the New Hampshire and Rhode Island/Connecticut borders. WRRS administers the provisions of the

contributory defined benefit plan established by Chapter 32 of the Massachusetts General Laws for employees and retirees of WRRS's member units.

WRRS is governed by a five-member board of trustees (Board). Board members have a fiduciary obligation to act in the best interests of the system's membership and to safeguard its assets. On a monthly basis, WRRS receives payroll deductions from the employees at each of its 100 member units. On a biannual basis, WRRS levies an assessment on each member unit for the employer's contribution to their employees' pensions. As of August 31, 2025, WRRS also had about $1.3 billion in assets invested with the state's Pension Reserves Investment Trust (PRIT) Fund that are used to help pay members' pensions. All of WRRS's funding comes directly or indirectly from public employees and the public entities they work for.

IV. Michael Sacco

Attorney Michael Sacco has practiced law for approximately three decades, focusing on pension law applicable to public employees in Massachusetts. He represents public retirement boards, not individuals with cases before retirement boards. For the past two decades, his firm, The Law Offices of Michael Sacco, P.C.,[1] provided legal services to approximately half of the state's 104 public retirement boards. For much of that time, WRRS was one of his firm's clients.

V. Sacco's Employment Contract with WRRS

At WRRS's June 25, 2019 Board meeting, Kevin Blanchette, who was then the WRRS CEO and Board chair, announced his intention to retire as CEO by the end of the year. Over that summer, the Board issued a job posting soliciting candidates for the CEO position. In the early fall, the Board identified three finalists from among the applicants, including Sacco, and interviewed them separately. Sacco emerged as the Board's top candidate.

During Sacco's interview and subsequent contract negotiations, Sacco's work for other retirement boards came up repeatedly, including during at least two WRRS Board meetings held in executive session. In its investigation, the OIG interviewed the five WRRS Board members involved in hiring Sacco. All five acknowledged that they knew Sacco's firm represented dozens of other retirement boards. The Board members all said they wanted Sacco working full-time, in the office, and exclusively for WRRS during its business hours. They did not want WRRS's needs to have to compete with 50 other boards for Sacco's time. Collectively, the Board members were apprehensive about Sacco's ability to manage WRRS's office, including his ability to perform its legal work, while representing the other retirement boards.

Sacco assured the Board members he could manage both. As reflected in Figure 1 below, Sacco wrote an email to Blanchette on October 25, 2019 saying that if WRRS hired him as CEO he would work full-time for WRRS plus spend about 40 additional hours per week on work for his law firm – "probably 20

[1] On January 29, 2024, Sacco changed the firm's name to Sacco & Collins, P.C. Attorney Christopher Collins has worked at the firm for approximately a decade.

on the weekends, and then 20 during the week before and after my WRRB office time and responsibilities." Sacco asked Blanchette to share the email with the other Board members.

Figure 1. October 25, 2019 Email from Sacco to Blanchette.[2]

From: Michael Sacco 10/25/2019 2:49:16...

Subject: November availability

To: Kevin Blanchette

… On the salary issue – I don't want to go into a long, drawn out explanation, but I hope your fellow Board members would appreciate that I plan on working on WRRB matters full-time, and it is my law practice that will be my "part-time" position, if putting in about 40 additional hours a week (probably 20 on the weekends, and then 20 during the week before and after my WRRB office time and responsibilities) …

The Board members said that Sacco told them at Board meetings that when he became the WRRS CEO, he would sharply curtail his work for other retirement boards and would restrict his work for outside clients to before and after WRRS's business hours, during his lunch hour, and on weekends. Sacco said he was hiring a second associate at his law firm and that he would transition the legal work of the firm's other retirement board clients to his associates.

Sacco verbally agreed to limit his work for outside clients to hours before and after WRRS's business hours, during his lunch hour, and on weekends.

In mid-November, the Board presented a draft employment agreement to Sacco to serve as the WRRS CEO for six years. One paragraph of the document reflected the Board's concerns about Sacco's ability to handle the CEO and legal duties for WRRS while continuing to perform legal work for 50 or more retirement boards. The draft contract stated Sacco "intends to wind down his law practice" as he transitioned to his job as WRRS's full-time CEO. The draft agreement stated, "The Board recognizes that in the initial year of employment, the CEO may need to be absent from time to time for the purpose of winding down or transferring certain ongoing matters, including . . . attending hearings or meeting with clients." The draft agreement required Sacco to give the Board advance notice of his absences from the office to perform work for other clients.

The Board said that it relied on Sacco's verbal assurances that he would substantially reduce his outside workload within a reasonable time frame and that he would refrain from working for other clients during WRRS business hours, except for court appearances on a handful of outstanding cases.

Sacco told the Board that the language in the draft contract – that he would "wind down" his practice and that absences were permitted only during his "initial year" as CEO – was too restrictive. The Board members said that Sacco told them he would immediately begin transitioning client work and acclimating the other boards' members to his associates, but the process could take longer than one year. According to the Board members, Sacco told them that a handful of his

[2] Retyped from original.

clients had active court cases and that he felt obliged to handle those through the end of litigation. He said those cases could extend beyond his "initial year" as CEO.[3]

The Board members told the OIG that they agreed to remove the language Sacco objected to, despite some doubts on whether Sacco could handle both WRRS and his other clients. They said they relied on Sacco's verbal assurances that he would substantially reduce his outside workload within a reasonable time frame and that he would not perform other clients' legal work during WRRS business hours, except for court appearances on a handful of outstanding cases. Board members said they believed Sacco would keep his word and saw no need to write explicit boundaries into the contract since Sacco had represented the Board for more than a decade and was an attorney.

The Board agreed to remove the reference to Sacco "winding down" his practice and limiting his outside work to his "initial year" as CEO. The paragraph about Sacco's work for other boards was modified to read:

> The Board acknowledges that the CEO will continue to devote time to his law practice by and through the Law Office of Michael Sacco, P.C. as needed, so long as such engagement does not substantially interfere with the performance of his duties under this Agreement. If such engagement will require him to be absent from the office, the CEO shall disclose such engagements to the Board on a monthly basis.

On November 26, 2019, Sacco signed this version of the contract. Sacco started work as the WRRS CEO on January 6, 2020, at an annual salary of $150,000 for a six-year term. Blanchette remained chair of the Board.

VI. WRRS Questions Sacco's Absences and Outside Commitments

In their interviews with the OIG, each Board member said that they gradually became aware of the extent of Sacco's absences from the office. One factor affecting in-office work was the COVID emergency, which was declared about two months after Sacco became CEO. From April 1 through June 30, 2020, Sacco divided the staff, including himself, into two groups of four or five individuals, with each group working in the office half the time. As most pre-COVID records were on paper, and as most staff work involves processing, filing, reviewing, or in some way handling records, the staff could not perform much work while at home. Board members and staff said that during this period, it was not always clear who was working and where. In July 2020, Sacco returned the staff to full-time in-office work, although the office was closed to the public.

[3] Four of the five Board members said Sacco told them that once those cases were resolved, he would no longer work for his outside clients. The fifth did not recall Sacco saying he would end his outside legal work entirely, only that he would substantially reduce it. The Board members used slightly different terms to describe Sacco's assurances, although each of them said he promised to significantly curtail his outside work within a year or two. Two said Sacco told them he was "winding down" his practice, another said Sacco intended to "scale back" his work, others said he promised to "step back" or "cut back" work for his private clients, with his associates taking over legal services to the other boards. WRRS staff present during the Board meetings when Sacco's hiring was discussed said Sacco told the Board more than once that he would "wind down" his practice and would be "fully out" in five years or less.

Board members and staff told the OIG that, beginning in late 2020, WRRS staff privately approached individuals on the Board about Sacco's frequent absences. Staff also claimed to have observed Sacco in his WRRS office participating in Zoom meetings on non-WRRS matters. They said that his absences and lack of engagement with the staff were affecting staff morale.

Board members told the OIG that in early 2021, the Board first questioned Sacco about performing work for other boards in the WRRS office, his absences, and his commitment to scale back his private practice. According to Board members, Sacco responded that he performed other clients' work only on his own time – on weekends, before and after WRRS business hours, and during his lunch hour. The Board delayed a decision on giving Sacco a merit bonus as provided in his contract;[4] however, on May 6, 2021, Sacco ultimately received a $5,000 merit bonus, the maximum allowed.

Board members said they subsequently raised these issues with Sacco several times. Each time, he told them that he was in the office nearly every day, that he was absent only occasionally, and that his contract entitled him to attend outside engagements as needed. The Board members said they believed the contract's language gave them little ability to rein in Sacco's absences short of firing him, a step they were not prepared to take. As it did in 2021, the Board gave Sacco a $5,000 merit bonus on March 31, 2022. Blanchette said Board members hoped the bonus would be an inducement for Sacco to cut back on his absences and his outside work. However, Sacco did not end or reduce his work for other boards at any point.

When the Board questioned Sacco on his alleged absences and non-WRRS work during WRRS work hours, Sacco claimed that he was in the office nearly every day, that he was absent only occasionally, and that his contract entitled him to attend outside engagements as needed.

Following Sacco's March 2023 departure as CEO, WRRS sent public records requests for Sacco's invoices to every retirement board in Massachusetts. WRRS Board members told the OIG that, after receiving those records, they were shocked to learn how many outside engagements Sacco attended while he was CEO. Prior to this, they had heard anecdotally from staff about Sacco's absences but did not know the scope of the problem. However, information showing Sacco's attendance at other board meetings was publicly available throughout his tenure. Like WRRS itself, Sacco's clients are public bodies and most regularly post the minutes of their meetings, which included meeting times and noted Sacco's attendance.

VII. Sacco's Resignation as the WRRS CEO

Sacco's last day of work for WRRS was March 9, 2023, but his tenure effectively ended during his annual performance review at WRRS's monthly Board meeting on January 31, 2023. According to the minutes of that meeting, WRRS Board members confronted Sacco for "at least the 5th time" about his absences from the office. Blanchette said it was difficult to schedule meetings with the CEO since Sacco's

[4] Paragraph 3.1 of Sacco's Employment Agreement with WRRS states: "Commencing effective with January 1, 2021 annual performance evaluation review, the CEO shall be eligible to receive merit compensation annually in an amount to be determined by the Board, not to exceed $5,000 if, in the sole discretion of the Board, the CEO has met the goals and objectives for the previous year as established by the Board after consultation with the CEO."

work schedule was so filled with engagements for his outside clients. According to the minutes, and as attendees at that meeting confirmed to the OIG, other Board members questioned Sacco's "commitment" to WRRS and believed Sacco prioritized the work of his private clients. The minutes state that Sacco replied that he did not need the WRRS CEO job and that he makes four to five times as much from his law practice. The minutes also reflect Sacco's statement that he was in the WRRS office in Auburn every day from 9 a.m. to 4 p.m. During the remainder of the meeting, Board members and Sacco continued to address Sacco's time management and commitment to WRRS's operations. "After a spirited discussion, Mr. Sacco asked that the Board allow him to resign rather than firing him," the minutes state. At that point, the meeting adjourned.

FINDINGS

I. As to Michael Sacco

Finding 1. Sacco violated the commitments he made to the Board during his 2019 hiring process.

During negotiations leading up to his hiring, specifically in response to Board members voicing apprehension regarding Sacco's ability to handle the role of WRRS CEO along with other outside work, Sacco assured the Board that he would work full-time as CEO and general counsel. Sacco also told the Board that he would limit outside work to before and after WRRS's business hours, during his lunch break, and on weekends (excluding exceptional circumstances, such as court appearances for clients with active cases). He further stated that he would sharply curtail his work with other retirement boards and would immediately begin transitioning his client work to associates in his law firm.

The OIG's investigation found that Sacco did not uphold any of these assurances upon which the Board relied in deciding to hire him.

The OIG reviewed various documents containing information about Sacco's workdays – invoices to his retirement board clients, those boards' meeting minutes, and his emails with WRRS and with clients regarding scheduling and vacations. The OIG also interviewed WRRS Board members and staff, officials at more than 10 retirement boards, and Sacco himself. The purpose was to determine whether the complaint – that Sacco was frequently absent during WRRS business hours and often conducted private business during work hours in the WRRS office – was substantiated and, if so, the extent of Sacco's absences, his use of WRRS resources for private purposes, and the financial impacts of his activities.

The OIG found that Sacco attended many meetings, hearings, and other engagements for non-WRRS boards, and communicated frequently by phone and email regarding other client matters during WRRS work hours.

A review of Sacco's first four weeks on the job revealed problems that would continue to be demonstrated throughout his tenure as CEO. On January 9, 2020, his fourth day of work, Sacco was absent from the WRRS office in Auburn much of the day. He billed the city of Worcester's retirement board for 3.6 hours to prepare for and attend its monthly board meeting, which began at 8:30 a.m. Following the Worcester Retirement Board meeting, Sacco attended a Division of Administrative Law Appeals (DALA) hearing in Worcester for which he billed 4.6 hours to the Franklin Regional Retirement System. Five days later, on January 14, 2020, Sacco attended the Weymouth Retirement Board meeting in person from 9 a.m. to noon and the Stoneham Retirement Board meeting from 1:30 p.m. to 3:40 p.m., billing each board for 5.5 hours of work. Each board is approximately one hour's drive from Auburn, which indicates that Sacco was not at WRRS's office during business hours on January 14, 2020. Overall, over the course of his first four weeks as WRRS CEO, Sacco attended 10 retirement board meetings and a DALA hearing. He billed his outside clients a total of 42.7 hours ($10,675) to attend those 11 meetings, all of which took place during WRRS business hours. In total, Sacco invoiced his clients for more than 107 hours ($26,750) of work during his first four weeks at WRRS.

Furthermore, based on a review of invoices for Sacco's top 20 clients (by billing amount), the OIG found that Sacco did not in any way cut back on the amount of outside legal work he performed while he was WRRS CEO. For work performed by Sacco himself, his firm billed those clients for 1,211.5 hours ($302,875) in 2020, 1,314 hours ($328,500) in 2021, and 1,270.1 hours ($330,226) in 2022. Sacco passed up an opportunity to transition case work to his associates during the early part of the COVID pandemic.

Some of Sacco's statements suggest that he never planned to significantly cut back on his private work. After taking the WRRS CEO position, Sacco told his other clients that they would not experience much difference. The evidence shows that Sacco worked on private client matters during WRRS work hours and that he did not curtail his client work or transition his cases to other associates, in contravention of the promises he made to the Board during his hiring process. In fact, the OIG's investigation shows that Sacco even added new private clients during his tenure as WRRS CEO.

Throughout the week prior to the January 31, 2023 Board meeting during which Sacco and the Board discussed his resignation, a member of the WRRS staff, at Blanchette's direction, tracked Sacco's time in the office. That individual told the OIG that Sacco was at the WRRS office briefly on three days that week for a total of three hours. Sacco's invoices for that week show that he attended six different meetings of the Lawrence, Saugus, Peabody, Andover, Lowell, and Plymouth retirement boards. He billed those boards 19.1 hours ($4,966) for those meetings. For the week, he billed outside clients for at least 28.7 hours ($7,462).

Sacco's absences were more frequent during the last two weeks of the month, the time period when most retirement boards hold their meetings. The OIG's review identified 26 weeks when Sacco had 3 non-WRRS appearances, 14 weeks with 4 outside appearances, 7 weeks with 5 appearances, 5 weeks with 6 appearances, and 3 weeks with 7 appearances.

Figure 2 below shows examples of Sacco's work for outside clients during WRRS's workday.[5] The time column reflects the period when Sacco was attending the meeting. Sacco's invoices almost always have a single entry which includes preparation, travel time, and attendance at the meeting. Information on the meeting times came from the respective retirement boards' minutes; information on the hours and amounts billed came from Sacco's invoices to the respective boards for work he performed himself.

[5] Almost all entries in Figure 2 were for board meetings; however, a few were for redacting medical records, attending a deposition, writing memos, or communicating with board officials or attorneys representing clients with cases before a retirement board.

The information in Figure 2 clearly contradicts Sacco's assurances that he was in his WRRS office every day with only one or two exceptions and that he was absent during work hours only "from time to time."

Figure 2. Sample of Outside Meetings Sacco Attended During WRRS's Work Hours.

Date Range	Date	Board	Attendance (In Person or Remote)	Time	Billing Hours	Charge
01/28/21	01/28/21	Lawrence	In Person	8:36 a.m. – 9:47 a.m.	2.5	$625.00
	01/28/21	Methuen	In Person	10:03 a.m. – 10:13 a.m.	1.4	$350.00
	01/28/21	Lowell	Remote	12:00 p.m. – 2:15 p.m.	2.5	$1,600.00
				Total	**6.4**	**$2,575.00**
02/23/21 to 02/26/21	02/23/21	Saugus	Remote	2:42 p.m. – 3:35 p.m.	3.5	$875.00
	02/23/21	Stoneham	Remote	2:00 p.m. – 2:30 p.m.	0.5	$125.00
	02/24/21	Marblehead	Remote	10:00 a.m. – 12:08 p.m.	5.6	$1,400.00
	02/25/21	Lawrence	In Person	8:32 a.m. – 10:58 a.m.	5.5	$1,375.00
	02/25/21	Lowell	Remote	1:00 p.m. – 3:30 p.m.	3.3	$825.00
	02/26/21	Plymouth	Remote	8:32 a.m. – 8:47 a.m.	0.4	$100.00
				Total	**18.8**	**$4,700.00**
03/23/21 to 03/26/21	03/23/21	Stoneham	Remote	2:05 p.m. – 3:01 p.m.	1.4	$350.00
	03/24/21	Reading	Remote	9:30 a.m. – 11:27 a.m.	5.1	$1,275.00
	03/24/21	Taunton	Remote	1:00 p.m. – 1:40 p.m.	1.1	$275.00
	03/25/21	Andover	Remote	8:30 a.m. – 9:20 a.m.	2.1	$525.00
	03/25/21	New Bedford	Remote	9:35 a.m. – 10:50 a.m.	1.6	$400.00
	03/25/21	Braintree	Remote	4:15 p.m. – 5:00 p.m.	1.3	$325.00
	03/26/21	Plymouth	Remote	8:30 a.m. – 9:10 a.m.	1.5	$375.00
				Total	**14.1**	**$3,525.00**
07/26/21 to 07/30/21	07/26/21	Essex Regional	In Person	8:30 a.m. – 9:50 a.m.	4.5	$1,125.00
	07/27/21	Stoneham	In Person	2:00 p.m. – 2:45 p.m.	3.3	$825.00
	07/28/21	Bristol County	Remote	10:55 a.m. – 11:16 a.m.	0.8	$200.00
	07/28/21	Taunton	In Person	1:00 p.m. – 2:30 p.m.	4.3	$1,075.00
	07/29/21	Lawrence	In Person	8:34 a.m. – 9:54 a.m.	4.1	$1,025.00
	07/30/21	Plymouth	Remote	8:37 a.m. – 8:52 a.m.	1.1	$275.00
				Total	**18.1**	**$4,525.00**
08/24/21 to 08/26/21	08/24/21	Lawrence	In Person	8:39 a.m. – 9:08 a.m.	3.5	$875.00
	08/24/21	Stoneham	In Person	2:03 p.m. – 2:49 p.m.	3.2	$800.00
	08/25/21	Fall River	In Person	8:30 a.m. – 9:55 a.m.	4.1	$1,025.00
	08/26/21	Marblehead	In Person	4:05 p.m. – 5:30 p.m.	4.8	$1,200.00
				Total	**15.6**	**$3,900.00**
09/22/21 to 09/24/21	09/22/21	Reading	In Person	9:30 a.m. – 11:30 a.m.	4.8	$1,200.00
	09/22/21	Taunton	In Person	1:00 p.m. – 2:30 p.m.	4.3	$1,075.00
	09/23/21	West Springfield	In Person	9:00 a.m. – 10:23 a.m.	5.3	$1,325.00
	09/24/21	Plymouth	Remote	8:31 a.m. – 10:42 a.m.	4.6	$1,150.00
				Total	**19.0**	**$4,750.00**
11/12/21	11/12/21	Saugus	Remote	10:05 a.m. – 3:12 p.m.	6.8	$1,700.00
				Total	**6.8**	**$1,700.00**
	01/24/22	Lowell	In Person	1:00 p.m. – 1:25 p.m.	4.6	$1,196.00
	01/25/22	Stoneham	Remote	2:00 p.m. – 4:00 p.m.	2.5	$650.00

Date Range	Date	Board	Attendance (In Person or Remote)	Time	Billing Hours	Charge
01/24/22 to 01/28/22	01/26/22	Fall River	In Person	8:30 a.m. – 9:35 a.m.	3.3	$858.00
	01/27/22	Andover	In Person	8:30 a.m. – 10:40 a.m.	4.8	$1,248.00
	01/27/22	Amesbury	In Person	1:30 p.m. – 2:50 p.m.	4.1	$1,066.00
	01/28/22	Plymouth	Remote	8:33 a.m. – 9:01 a.m.	1.1	$286.00
				Total	**20.4**	**$5,304.00**
06/16/22	06/16/22	Newburyport	In Person	8:30 a.m. – 11:00 a.m.	4.9	$1,274.00
	06/16/22	Saugus	N/A	N/A	5.7	$1,482.00
	06/16/22	Webster, Methuen	N/A	N/A	2.0	$520.00
	06/16/22	New Bedford, Plymouth	N/A	N/A	0.4	$104.00
				Total	**13.0**	**$3,380.00**

Attending outside board meetings and other private appointments occurred throughout Sacco's time at WRRS, from his first week to his last. Nearly all these board meetings and appointments took place during WRRS business hours, and he attended the majority in person. Of more than 350 appointments taken by Sacco, the OIG identified only one possible occasion when he used leave time to attend a meeting for a private client.[6]

As illustrated in Figure 2 above, the length of the meetings varied widely – from as little as 10 minutes to more than 5 hours.

The OIG's review of Sacco's invoices and clients' board minutes identified at least 60 dates when he was physically present elsewhere on behalf of his private clients for at least half (four hours) of the WRRS workday. For example, on December 22, 2022, Sacco arrived at the Methuen Retirement Board at 9:38 a.m. and the meeting ended at 11:10 a.m. From 1:00 p.m. to 2:20 p.m., he participated in the Lowell Retirement Board meeting. He billed the boards for 8.0 hours in total ($2,080). The boards held their meetings in their respective city hall offices, both of which are about an hour's drive from WRRS's office in Auburn. Instead of spending his workday in WRRS's office, Sacco spent nearly the entire workday meeting private clients in the Merrimack Valley or on the road. The OIG identified an additional 16 dates when Sacco attended multiple meetings in person at times and locations that would have kept him away from WRRS's office nearly all day. The OIG identified another 43 dates when Sacco's attendance at meetings in person meant he was absent for at least half of the WRRS workday.

The OIG reviewed a copy of the Outlook calendar Sacco maintained on his computer at WRRS's Auburn office. The calendar contained entries for court dates of WRRS-related cases, deadlines when briefs were due, appointments with WRRS investment managers, dates and locations of seminars or benefit fairs for WRRS members, and Sacco's planned absences for vacation or medical appointments.

[6] Sacco remotely attended a Quincy Retirement Board meeting on March 17, 2022, during a week he was on a planned vacation in Florida. He billed Quincy for 1.5 hours. However, it is not clear whether he actually used vacation time that day. Sacco's Outlook calendar has six weekdays blocked off as vacation from March 11-20, 2022, but his leave calendar (which Sacco signed) only charged him for three vacation days without specifying which dates were vacation and which ones were purported workdays.

The calendar also had 62 dates reserved with the notations "Michael Unavailable" and "Leave Open for Michael." These entries had no information about the nature of the appointment.

An OIG review identified that 41 of the dates Sacco blocked off on his calendar as "Michael Unavailable" matched one of his private client retirement board's monthly meetings; another 5 corresponded to court hearings on a matter connected to one of his retirement board clients. According to current and former WRRS staff members, Sacco made these entries himself to ensure that his WRRS executive assistants did not schedule meetings on those dates.

Finding 2. Sacco attended more than 350 board meetings, court hearings, administrative sessions, and other engagements for his private clients, nearly all of them during WRRS work hours.

Sacco participated in more than 350 engagements on behalf of his private clients while he served as WRRS CEO. As described in Finding 1, the OIG identified 26 weeks with 3 non-WRRS engagements, 14 weeks with 4 engagements, 7 weeks with 5 engagements, 5 weeks with 6 engagements and 3 weeks with 7 engagements. To put these figures in perspective, Sacco's tenure as CEO included a total of 795 workdays. After deducting his 90 days of paid leave,[7] Sacco's 38-month tenure as CEO comprised 705 days when he was expected to work. With more than 350 outside appearances, Sacco on average attended an engagement for a private client every other workday. Broken down by hours billed, the OIG found that Sacco billed his clients for more than 837 hours for his appearances at board meetings, court hearings and similar engagements during his 38 months as CEO. That total is the equivalent of 105 eight-hour days, or 42% of a year; that is equivalent to the number of workdays between New Year's Day and Memorial Day.

In his interview with the OIG, Sacco said that his contract permitted him to attend any board meetings or other engagements for his private clients, provided that they did not interfere with his CEO duties. He further argued that as long as he did everything WRRS needed from its CEO, the hours he worked were irrelevant. However, this runs directly counter to the assurances that he made to the Board that it reasonably relied on when hiring him. Furthermore, as demonstrated throughout this report, there is strong evidence that Sacco failed to perform important aspects of his job as CEO, as discussed further in Finding 4.

Finding 3. Sacco worked only 20 to 30 hours per week for WRRS.

In his interview with the OIG, Sacco reported that the WRRS CEO job required approximately 20 hours of work per week and that he spent about 30 hours per week working in the WRRS office.

Furthermore, as discussed previously, Sacco spent extensive time either away from the WRRS office or using his WRRS office to conduct work for outside clients during WRRS business hours. The OIG calculated that Sacco billed clients for attending board meetings, court hearings, and other engagements

[7] Sacco's contract provided him with 20 days of vacation, three personal days, and two "floating" holidays per year in 2020, 2021, and 2022. He also received nine "accumulated" days during those years for not using sick leave; accumulated days could be used as vacation at any time. On January 1, 2023, Sacco received another three personal days. He worked almost 10 weeks in 2023, enough to accrue three more vacation days.

for a total number of hours equal to 105 eight-hour days, or the number of workdays between New Year's Day and Memorial Day. And as described in Finding 1, the OIG found 60 dates when Sacco was conducting work for other clients outside of his WRRS office for at least four hours. For 17 of those dates, he was absent for all or nearly all of the day without using any leave time. These 38.5 days (17 full days and 43 half days) further demonstrate that Sacco did not work full time for WRRS.

Finding 4. Sacco routinely underperformed or neglected certain duties of his role as the WRRS CEO.

Based on interviews with WRRS Board members, the OIG found that Sacco failed to perform crucial functions and duties of his position as the WRRS CEO.

Sacco's employment contract stated he could devote time to his private practice "as needed, so long as such engagement does not substantially interfere with the performance of his duties under this Agreement." WRRS's job description for CEO contained a summary and seven numbered categories of duties and responsibilities – some internal and operational, others outward-facing:

> 1. Analyzes proposed administrative and legislative actions as to their actual or prospective impact on the Retirement Board and guides the Board in the development of its position on such proposals . . .
>
> 2. Promotes effective relationships with public officials and their staffs, participating employers, union representatives, and other professional groups. Communicates official plans, policies and procedures to general public. Represents the Retirement Board with federal, state and local government agency personnel . . .
>
> 3. Directs, coordinates and oversees consultants and other advisors to the Retirement Board . . . Establishes proper measures of performance, counsels managers as to execution of programs and when necessary, provides direction for modification or remediation of plans.
>
> 4. Develops and implements an organizational plan . . . which will enhance the operational effectiveness of the organization.
>
> 5. Directs and coordinates a broad range of staff and service functions that provide support, service and assistance to the Retirement Board. Provides clear leadership to the organization and delineates responsibilities and authority for staff. Trains, motivates, and evaluates staff; reviews progress and directs changes as needed.
>
> 6. Ensures that effective business systems, procedures, and financial controls are established and maintained for the administrative operations.

7. Plans, directs, and controls the Retirement Board's overall financial plans and policies, accounting practices, and relationships with financial institutions. Directs the banking, credit, and investment functions of the Retirement Board including the procurement, custody and investment of funds and other financial assets.

The version of the job description appended to Sacco's employment contract also contained an eighth category, reflecting his responsibilities as WRRS's general counsel.[8]

Pursuant to Sections 1 and 23 of Chapter 32 of the Massachusetts General Laws, "any person who exercises any discretionary authority or discretionary control respecting management of the funds of any retirement system or . . . management or disposition of its assets," such as a retirement system's CEO, has a fiduciary duty to "discharge his duties for the exclusive purpose of providing benefits to members and their beneficiaries with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use . . . ."

WRRS Board members told the OIG that Sacco underperformed or entirely neglected certain CEO duties. The Board members connected Sacco's underperformance to the large amount of time he spent working for his private clients, which reflected his priority to perform legal work and generate revenue for his firm.

For example, everyone who served on the Board during Sacco's tenure said his outreach and engagement with active employees, retirees, and municipal officials was infrequent, perfunctory, and seriously deficient. Board members said serving WRRS's constituencies requires holding benefit seminars, conducting workshops on the retirement process, and meeting with town treasurers and administrators who collect employees' withholdings and municipal assessments that fund the system. Board members said the CEO's outreach, visibility, and accessibility are important in part because three Board members are elected: one by active employees, one by retirees, and one by treasurers of the member units. The treasurers make up an advisory council that certifies the budget and acts as WRRS's legislative body. Board members said Sacco rarely organized or attended outreach engagements, and typically only did so within a few weeks of his year-end review. The OIG further found that, in 2021 and 2022, Sacco's calendar included months-long gaps between engagement events for members.

The CEO job description does not specifically mention putting on benefit seminars or similar activities; however, it contains general language that reflects these duties. The summary states the CEO "[o]rganizes and executes . . . programs to develop and maintain employer, member, legislative and other interested parties understanding and good will towards the organization." Category 2 of the job description states the CEO's duties include "Promot[ing] effective relationships with public officials and their staffs, participating employers, union representatives and other professional groups." Category 2 also states the CEO's duties include "Communicat[ing] official plans, policies and procedures to general public."

[8] *See* Appendix B. WRRS CEO Job Description, As Appended to Sacco's Employment Contract.

The OIG reviewed Sacco's calendars, WRRS's minutes, and Sacco's reimbursement for mileage, which included his travel to outreach meetings. In 2020, Sacco reported nine "meet-and-greets" at member towns shortly after taking office as CEO, but none after the governor declared a COVID emergency in March. In 2021, the documents list seven meetings (five close to his year-end review). In 2022, the documents list twelve engagements (nine close to his year-end review). In 2021 and 2022, Sacco's WRRS calendar contained months-long blocks with no events of this type listed.

Another outreach tool was a biannual membership newsletter, which WRRS had published for many years to communicate and connect with active employees, retirees, and unit treasurers. In a series of WRRS Board meeting minutes, Sacco repeatedly told the Board that publishing the member newsletter needed to be postponed by a month or two. It was the CEO's responsibility to produce much of the newsletter's content. Meeting minutes in 2021 and 2022 contain the following information:

- *August 31, 2021*: "Newsletter in the works for October distribution."
- *September 28, 2021*: "CEO informed the Board that the Newsletter is in the works for November distribution."
- *October 19, 2021*: "With everything going on we may need to push the newsletter back to December, but we're on track and the CEO is preparing the written materials."
- *November 30, 2021*: "The CEO informed the Board that the newsletter has been pushed back, and the goal is to issue it at the end of January."
- *March 29, 2022*: "The CEO informed the Board that the reinstitution of the biannual newsletter has been on the back burner due to workload and staffing changes, but he hoped to have it ready to go out in July."

WRRS never produced another newsletter during Sacco's tenure; his successor revived it in 2024, according to WRRS minutes.

In late 2021, the Board directed Sacco to produce a report on the system's data security measures after PERAC issued a bulletin regarding recent cyberattacks on retirement boards. Over the next several months, WRRS minutes record Sacco apologizing for delays in producing the report. Blanchette said Sacco's first version was produced months late, in the fall of 2022. He added that the Board rejected Sacco's first version because the content appeared to have been copied from another organization's security plan; Sacco was told to rework the report.

Category 3 of the CEO job description states the CEO is responsible for overseeing investment advisors and investment managers. Category 7 states the CEO "[d]irects the banking, credit and investment functions" of WRRS. Blanchette said Sacco did not attend quarterly meetings of the Pension Reserves Investment Management (PRIM) Board or its Investment Committee, calling it a "waste of time." In an interview with the OIG, Blanchette stated, "We had a billion dollars invested with PRIM. We are fiduciaries. We've got to monitor that . . . and he never did."

Category 5 in the WRRS CEO job description mentions "train[ing], motivat[ing] and evaluat[ing] staff" as a responsibility of the position. Not long after taking over as CEO, Sacco canceled WRRS's weekly Friday staff meeting, referring to it derisively as "circle time." Current and former WRRS staff members said the meetings provided a break in the workday and boosted morale. In interviews with the OIG, WRRS staff members said that Sacco's discontinuation of the group meetings illustrated his disinterest in the people who worked for him.

While not mentioned in the CEO job description, meeting with the Board chair to set the agenda for each Board meeting was a regular function for the CEO. Blanchette and Sacco usually met, sometimes virtually, about one week prior to the Board meetings, which were the last Tuesday of the month. Blanchette said that beginning in the latter half of 2021, scheduling these meetings with Sacco became more difficult. Blanchette said that when he contacted Sacco's administrative assistant about setting a meeting, she would have to check with Sacco's law office for his availability.

For example, on March 3, 2022, Sacco's administrative assistant emailed Blanchette asking whether he could meet Sacco on March 22 to set the agenda for the Board meeting on March 29. Blanchette responded, "Does Michael have any other days available this month?" The assistant answered, "Michael will be on vacation from Friday March 11th through Sunday March 20th. He can do ZOOM meetings on March 16th and March 18th in the morning and then in the afternoon on March 23rd or March 24th." In addition to six vacation days, Sacco's calendar for March had seven other dates blocked off as "unavailable." On those dates, Sacco participated in a trial and seven non-WRRS board meetings.

In another example, on November 17, 2022, Blanchette received an email from the National Conference on Public Employee Retirement Systems (NCPERS) asking WRRS to participate in its annual study of public retirement plans across North America; the deadline to participate was December 1. Blanchette forwarded the email to Sacco with the request, "Would you please take care of this as soon as possible."

Sacco forwarded Blanchette's email chain to the Board administrator, asking that she and her staff assemble the data and respond to NCPERS by the deadline. Sacco wrote:

> "So sorry – I can try to work on this when I get back in the office and have access to all the financial information I need, but since it is due on 12/1, not sure I will be able to get to it, and I don't want to monopolize everyone's time on Monday the day before the [WRRS] Board meeting. I started to do it but then realized I can't from here – any assistance you can provide over the next 10 days would be much appreciated."

Sacco's email did not elaborate on "here," but the staff understood him to mean he was in or traveling to Florida where he spent the following week over Thanksgiving. As described more fully in Finding 7, Sacco used a leave day on Tuesday, according to his WRRS leave calendar, and Thursday was a holiday; however, he did not report using any leave time for Monday, Wednesday, or Friday of that week.

Sacco returned to work at the WRRS office on Monday, November 28, during which time he and WRRS staff prepared for the next day's WRRS Board meeting. Theoretically, Sacco could have used Wednesday, November 30, to complete the NCPERS study prior to the December 1 deadline. His WRRS

calendar was open; however, his private calendar was full. He attended the Lawrence board meeting that morning and the Amesbury board meeting that afternoon, billing them for 7.7 hours ($2,002) in total. WRRS staff compiled the NCPERS information while Sacco was in Florida.

In the two-week period between Blanchette's email directing Sacco to complete the NCPERS survey and the December 1 deadline, Sacco attended five retirement board meetings (billing 16.3 hours, or $4,238), billed his clients for 24.8 hours ($6,448) of additional work, collected two weeks' salary ($6,120) from WRRS, and spent all of Thanksgiving week in Florida while using a single vacation day.

In his interview with the OIG, Blanchette summarized Sacco's attention to his job duties as the WRRS CEO with the statement: "He was not present. He wasn't doing the outreach. He wasn't participating and representing us at [PRIM] meetings . . . He eliminated staff meetings." He said Sacco did not fulfill his CEO duties in large part because he prioritized performing legal work for his private clients and the revenue that work provided him.

When the OIG asked Sacco why he did not use leave time for instances when he was away from the office for most of the day, he replied that as long as he took care of whatever WRRS needed on a given day – even if it was writing a single email or stopping in the office to check his mail – he had fulfilled his CEO duties and did not need to use any leave.

In contrast, when the OIG asked Sacco about several occasions when his invoices showed he attended multiple non-WRRS board meetings in person during WRRS business hours in a single day, Sacco said this was allowed under the "as needed" language of the contract. Sacco said he was an exempt employee who was paid a salary to do the job of the WRRS CEO; as long as he fulfilled those duties, he could also attend to the needs of his firm's clients. After discussing several dates when his bills show he was absent all day from WRRS's office attending meetings of other boards, Sacco said the absences were permitted by his contract. Sacco said on most of these occasions he probably stopped at the office to pick up his mail on his way home. Sacco insisted that there were only one or two days, aside from vacations or sick leave, when he did not spend at least some part of the day at WRRS's office. When asked why he did not use leave time for instances when he was away from the office most of the day, he said as long as he took care of whatever WRRS needed on a given day – even if it was writing a single email or stopping in the office to check his mail – he had fulfilled his CEO duties and did not need to use any leave.

Most current and former WRRS staff interviewed by the OIG said Sacco was frequently absent from the office for sizable portions of the workday. Staff said that Sacco's appearances at the office were often brief, sometimes to merely pick up his mail. They said when he was at the office, he generally arrived between 9:00 a.m. and 9:30 a.m. and left between noon and 3:00 p.m. One former WRRS employee told the OIG that Sacco was in the office all day from 9 a.m. to 5 p.m. almost every day and, other than vacations, was absent on only three occasions. When shown a list of dozens of non-WRRS board meetings and court dates Sacco attended in person during the year that this employee worked for WRRS, she was unable to explain how Sacco attended all of those meetings. She said she did not remember these absences, and that it is possible that Sacco was often absent and she did not notice.

Sacco's contract states he could perform non-WRRS work provided that doing so does not "substantially interfere" with his CEO responsibilities. Based on the evidence found during its investigation, the OIG concludes that Sacco's prioritization of his legal work for other clients did indeed substantially interfere with his performance of the WRRS CEO responsibilities, to the detriment of WRRS.

Finding 5. Sacco communicated extensively on private client matters during WRRS business hours and used public resources, including his office, to do so.

The OIG's investigation found that Sacco regularly used public resources to communicate by email and phone with retirement board members, board staff, and attorneys about private client matters during WRRS business hours. WRRS staff observed Sacco participating in videoconferences from his WRRS office, the overwhelming majority of which occurred when WRRS did not have meetings or court dates scheduled, leading staff members to believe the videoconferences pertained to private client matters.

Over his tenure, Sacco participated in at least 165 events over 155 different dates during normal WRRS business hours,[9] including 100 non-WRRS board meetings attended by videoconference (Zoom, Webex, GoToMeeting, and other platforms), 16 court hearings by videoconference, and at least 40 events over the phone.[10] Because the remote meetings occurred during WRRS business hours, the OIG considers it likely that Sacco participated in many of them from WRRS's office; otherwise, Sacco would have been absent from WRRS's office during times that he was credited with working onsite.

The OIG also compiled entries from Sacco's invoices to his top 20 clients (based on billings). Those invoices indicate Sacco spoke by phone with board administrators, court clerks and magistrates, PERAC officials, and other attorneys at least 437 times over the course of his tenure.

Sacco's phone calls with courts and administrative bodies likely took place predominantly during the normal business hours of government offices. The OIG interviewed several attorneys who represented individuals with pension matters involving Sacco's clients. Those Sacco dealt with most frequently said Sacco told them he preferred to email or conduct phone calls before 9 a.m. or after 4 p.m. They said that most of their communications with Sacco occurred prior to 9 a.m. or after 4 p.m., although they did sometimes talk and email during ordinary business hours. Attorneys who dealt with Sacco less frequently said Sacco never mentioned needing to work around WRRS's business hours and they communicated during normal business hours.

During his interview with the OIG, Sacco acknowledged that he routinely performed non-WRRS work at WRRS's office, but said that doing so was allowed. Sacco stated that he attended Zoom board meetings and court hearings when they were scheduled but would only do file reviews, drafts, letters, emails, and telephone calls during lunch. Sacco stated that, outside of the above-noted exceptions, he categorically did not do private work while at the WRRS office during business hours. He said that his

[9] The OIG did not include events that took place before 8:00 a.m., after 4:30 p.m. or on the date that Sacco participated in a Quincy board meeting while on vacation in Florida.

[10] Sacco's invoices and the board minutes did not always specify whether he participated by videoconference or telephone, so for a small number of the remote meetings the OIG could not determine how many of the remote meetings took place via videoconference and how many via conference call.

contract gave him broad discretion to work for his private clients at any time, not just during his lunch hour; however, he said he scrupulously avoided doing client work at WRRS because he did not want to abuse the situation.

The OIG interviewed several individuals who participated in some of the videoconferences. They said Sacco's background looked like an office setting but they did not recall any distinguishing or identifying features. They said they had never been to Sacco's law office or to his WRRS office and were unsure where Sacco was located during the events. Staff at WRRS viewed video of a portion of an Appeals Court hearing conducted remotely on December 7, 2020. They said that video shows Sacco sitting in the WRRS office with a bookcase and his diplomas on the wall behind him. They said Sacco usually sat in this location during Zoom meetings at the WRRS office.

The OIG reviewed the metadata on Sacco's emails sent to officials at 10 of the 54 retirement board clients Sacco represented during his tenure as the WRRS CEO. The 10 boards were a mix of large, active clients and boards with small memberships for whom Sacco performed less work. As shown in Figure 3 below, between February 1, 2020, and March 9, 2023, Sacco sent at least 2,736 emails to officials at these 10 boards.[11] Of those, at least 763 emails (28%) were sent between 9 a.m. and 4 p.m. (excluding lunch hour), hours Sacco claimed he worked only for WRRS.

Figure 3. Sacco Emails to 10 Non-WRRS Boards During WRRS Work Hours (February 1, 2020 through March 9, 2023).

Retirement Board	Total Emails Sent	Emails Sent During Work Hours	Emails Sent During Lunch Hour	% of Emails Sent During Work Hours
Andover	175	84	29	48%
Essex Regional	658	127	88	19%
Fall River	203	53	16	26%
Haverhill	169	26	30	15%
Methuen	253	87	30	34%
Newburyport	49	8	9	16%
Reading	284	71	44	25%
Saugus	250	53	22	21%
Winthrop	209	81	45	39%
Worcester (City)	486	173	79	36%
Total	**2,736**	**763**	**392**	**28%**

Extrapolating this data, the OIG considers it likely that Sacco sent at least 2,000 emails on behalf of his retirement board clients during WRRS business hours.

[11] Three of the 10 retirement boards did not have email metadata available for Sacco's entire 38-month tenure at WRRS. Andover provided 26 months of data, Haverhill provided 23 months, and Newburyport provided 20 months.

Sacco repeatedly told the Board that, other than attending monthly board meetings "from time to time" or responding to emails and calls during his lunch hour, he did not perform legal work for his outside clients during WRRS's workday. In his OIG interview, he made the same claim several times. The OIG's review of his email metadata and interviews with other attorneys identified myriad examples of Sacco performing legal work for his law firm's clients during WRRS business hours, contrary to his statements to the Board and the OIG.

Despite Sacco's assurances that he scrupulously avoided doing private client work at WRRS, the OIG's review shows that Sacco sent 28% of his emails to 10 retirement board clients during WRRS work hours.

Finding 6. Sacco violated his contractual requirement to notify the Board of his absences related to other work.

"The Board acknowledges that the CEO will continue to devote time to his law practice by and through the Law Office of Michael Sacco, P.C. as needed, so long as such engagement does not substantially interfere with the performance of his duties under this Agreement. If such engagement will require him to be absent from the office, the CEO shall disclose such engagements to the Board on a monthly basis."

-Employment Agreement between WRRS and Michael Sacco

Sacco's contract stated that he must inform the Board on a monthly basis of all absences associated with work for other retirement boards. In his interview with the OIG, Sacco said that Blanchette told him that he did not need to report these absences to the Board as long as he informed the Board administrator. Sacco told the OIG that pursuant to that verbal authorization, he informed the Board administrator every time he would be absent and that "everyone" knew where he was on those occasions.

As an attorney, Sacco would have or should have known that the chair alone could not modify contractual terms without the Board's approval. Sacco was well aware from contract negotiations that his outside work obligations were an issue of concern to the Board.

Further, in an interview with the OIG, Blanchette denied telling Sacco that notifying the Board of his absences was not required. Blanchette added that he did not have the authority to waive a contractual requirement; only the full Board could take such action through a vote.

The Board administrator told the OIG that Sacco told her occasionally that he would not be in the office, but he almost never told her the reason for his absence or where he would be. The only exceptions, she said, pertained to WRRS matters. She said Sacco also told her a few times that he was leaving to attend the Worcester Retirement System's monthly board meeting, which was held a few minutes away from WRRS's office.

Finding 7. Sacco did not claim leave time for multiple vacation 'travel days.'

Unlike other WRRS employees, each January 1 Sacco was credited in advance for his 20 days of annual vacation.

Prior to and during Sacco's tenure at WRRS, the Board administrator and a second staff member maintained records of each WRRS employee's use of paid leave, including Sacco. During the first 30 months of Sacco's service, they kept an annual record for each employee on a photocopy of the "Trial Court of the Commonwealth Attendance Calendar for Fiscal Year." One side of the document had a chart with columns for sick, vacation, personal, and compensatory leave. Each column was divided into three sub-columns labeled "Earned," "Taken," and "Balance." The chart had rows for each month labeled July through the following June.

In addition, until November 2021, each employee received a "Monthly Vacation, Personal and Accumulated Time Report" every month to review for accuracy. This document showed the employee's leave balance in each category (expressed in days) at the start of the month, additional time earned during that month, leave taken during that month, and the balance in each category at month's end. Employees were required to sign the document "under penalties of perjury" attesting to its accuracy.

Beginning in mid-2022, WRRS used an electronic calendar created by the Board secretary which used a color-coded system to record employee leave.

The OIG reviewed Sacco's leave calendars, monthly time reports, WRRS Outlook calendar, and emails Sacco sent to clients notifying them about his vacation schedule. Sacco's time sheets indicate that he almost always used his vacation, personal, "floating," and "accumulated"[12] leave days in blocks to spend in Florida, where he has a home. In his interview with the OIG, Sacco said he preferred to drive to Florida to accommodate his dogs. WRRS staff told the OIG that Sacco usually informed the Board administrator and a second WRRS staff member in advance of a vacation. They would then record the dates on the leave calendar, and Sacco or his executive assistant would block the dates off on his WRRS Outlook calendar.

Sacco also informed his private clients when he would be on vacation, sometimes via a group email. In these emails, Sacco often indicated that his vacation was beginning days earlier than what he told WRRS. For example, Sacco told WRRS he would be on vacation beginning Friday, July 2, 2021; however, three days earlier, on Tuesday, June 29, Sacco sent the following email to a group of his clients:

> "I will be on vacation today through July 11th, returning on July 12th – you know the drill – other than today and tomorrow which will be travel days, I will be checking and responding to emails each morning, so don't hesitate to contact me as you ordinarily do…"

Records show that Sacco attended the WRRS Board meeting on June 29, from 8:13 a.m. to 10:17 a.m. That afternoon, he briefly phoned in to Stoneham's board meeting, billing 18 minutes. Sacco's WRRS

[12] "Floating" holidays replaced former state holidays (Evacuation Day in March and Bunker Hill Day in June). Sacco could use his floating holidays at any time during the year. WRRS employees, including Sacco, earned an "accumulated" day off, later labeled a "comp" day off, for each quarter they did not use sick leave.

timesheets do not record vacation time for Wednesday, June 30, or Thursday, July 1, nor did Sacco bill clients for work on those dates.

Sacco sent similar emails to his clients at other points during his time as the WRRS CEO. He informed his clients that he was leaving on vacation on a given day, which preceded the dates he told WRRS he was taking vacation. In the client emails, Sacco referred to the first two days as "travel days" and said he would be largely unavailable. The dates he identified to clients as travel days were WRRS workdays and were not recorded with WRRS as vacation.

The OIG review identified 16 dates when Sacco was traveling to or in Florida but did not claim WRRS paid leave. In addition to the example above:

- Sacco informed clients he would be on vacation from Thursday, July 2, to Thursday, July 9, 2020. His leave calendar shows he used two personal days (July 6 and July 7) and claimed the holiday on July 3 (July 4 fell on a Saturday). He was not charged for using any leave on July 2, July 8, or July 9.
- Sacco marked his WRRS Outlook calendar as "Michael Out" on Wednesday, December 23, 2020. The calendar was blank for Thursday, December 24. He did not use WRRS paid leave for the two days immediately preceding his planned two-week vacation in Florida for the Christmas and New Year's holidays.
- Sacco sent a group email to clients at 5:49 a.m. on Thursday, April 8, 2021, which said, "Please note that I will be on vacation starting today and returning on April 20th….you know the drill – I will be checking my emails daily beginning on Saturday (today and tomorrow are travel days)…" Sacco did not use WRRS leave for April 8, his first "travel day."
- Sacco's Outlook calendar for March 2022 had six weekdays blocked off for vacation in Florida; however, the WRRS form for reporting use of leave time and tracking leave balances shows Sacco was charged for using only three vacation days that month. The OIG could not determine the reason for this discrepancy.
- Sacco's WRRS Outlook calendar had the week of May 2 to 6, 2022, blocked off for vacation. He told WRRS he would use five days of vacation leave. However, in mid-April, Sacco began contacting other boards to make arrangements to leave for Florida several days earlier. On April 19, Sacco emailed the executive director of the Andover Retirement Board. In it, Sacco wrote, "While I have you…do you think you will need me for that [April 28 board] meeting? If you want me there…I will gladly attend – leaving for vacation after the meeting to start my drive to Florida, so just trying to plan ahead."[13] Officials at the Andover Retirement Board agreed to let Sacco participate in the meeting remotely by

[13] On April 22, Sacco wrote the Saugus board administrator, "I may have a chance to head out on my vacation sooner than expected." He said he would send his legal associate to Saugus's April 27 meeting in his place. Sacco told Saugus he was contacting Stoneham with the same request.

phone so that he could get started sooner on his drive to Florida. Sacco thanked them saying, "That would be wonderful – will save me a couple hours and make a huge difference...I will be waiting at 8:30 with the SUV packed and my Hawaiian shirt on ready to start my trip!" Sacco did not use any leave time on April 28 or 29. Sacco's WRRS calendar for Friday, April 29, was marked "Michael Unavailable."

- Sacco spent Thanksgiving week of 2022 traveling to and in Florida. He used a "floating" holiday on Tuesday, November 22, and Thursday was a holiday. He did not use WRRS paid leave on November 21, 23, or 25.

In the examples above, Sacco typically billed clients for no time or minimal time on the dates he identified as "travel days." The OIG identified the same pattern before and after other trips to Florida. For example, on Saturday, September 4, 2021, Sacco posted a photo on his Facebook page of himself and a friend after finishing a round at a golf course in Venice, Florida. Sacco had blocked off the prior two days with the notation "Michael Unavailable" on his WRRS calendar; his invoices also show minimal billings to his clients. He did not use any vacation time.

The OIG calculated the impact these 16 dates would have had on Sacco's paid leave balances if he had reported them to WRRS. According to the OIG's calculations, Sacco would have exhausted his vacation in October 2021 and ended the year with a negative leave balance of 5 days. As noted above, at the start of each calendar year, WRRS credited Sacco in advance for his 20 days of vacation; as a result, he would have started 2022 with a balance of 15 vacation days. In 2022, Sacco would have exhausted his paid leave in May and ended 2022 with a negative leave balance of 6 days, rather than the 10 days of paid leave credited by WRRS. According to the OIG's running tally, including the 3 personal days and 20 vacation days WRRS credited in advance each January 1, Sacco would have started 2023 with 17 days of paid leave. On his last day at WRRS, March 9, 2023, Sacco would have had a balance of 5 days of paid leave, equal to $3,060.

Shortly after his resignation in March 2023, WRRS calculated a final payout to Sacco for his unused vacation leave and sent Sacco a check for $3,876 for his 6.33 days of unused vacation leave. Sacco objected to WRRS's payout, saying he was entitled to the 20 vacation days he received at the beginning of each calendar year. In a March 24, 2023 letter, Blanchette said that because Sacco worked only 10 weeks in 2023, he received a prorated amount of his annual vacation. Sacco subsequently threatened legal action regarding his payout and other issues. In early July, the Board agreed to credit Sacco with the full 20 days of vacation in exchange for him dropping all claims against WRRS. He received a payout of $11,129 – 18.17 days of vacation in addition to the $3,876 he received in March, for a total payout of $15,005.

As described previously, Sacco never used leave time on dates when he was away from the WRRS office attending other boards' monthly meetings. In his interview with the OIG, Sacco said that as long as he performed whatever CEO work WRRS needed on a given day, he had fulfilled his contractual obligations and was not required to use leave time for the hours he spent going to, attending, and returning from outside engagements.

Sacco expressed a similar maximalist opinion regarding his use of vacation time. In his interview, the OIG asked Sacco about April 28, 2022, a date when Sacco left in the morning on a two-day drive to Florida. When asked why he did not use paid leave on a date he had told clients – but not his employer – he was on vacation and unavailable, Sacco said that he probably wrote an email for WRRS that day. When the OIG asked if writing a single email justified not using vacation leave for two days in which he was driving to Florida, he answered that it did.

When the OIG asked Sacco if writing a single email justified not using vacation leave for two days he spent driving to Florida, he answered that it did.

The OIG regards Sacco's opinion that any amount of work on a given day – even a single email – excused him from using any paid leave as insulting to WRRS members and the employers who fund the system. The OIG finds Sacco's actions in taking at least 16 vacation days without informing the Board or senior staff to be dishonest conduct, particularly by a CEO who is supposed to be the chief leader of the organization. Sacco unfairly benefited from this deception, at the public's expense, by getting more vacation days in 2021 and 2022 than he was entitled to. He also received a larger payout when he resigned because WRRS had credited him for carrying over unused vacation days from 2022.

Finding 8. Sacco potentially breached the state's post-retirement cap on earnings from public agencies.

Sacco resigned from WRRS effective March 9, 2023. Later that month, he submitted paperwork to retire and begin receiving a retirement allowance[14] from WRRS.

Pensions for Massachusetts public employees are calculated using a formula composed of the retiree's years of creditable service, the average of the retiree's highest salaries over three (or in some cases, including Sacco's, five) years, and the individual's age at the time of retirement. The retiree's last employer issues the monthly check but receives contributions from the retiree's prior public sector employers (PERAC calculates the percentages paid by each). As his last public employer, WRRS is responsible for processing his retirement application and administering his retirement benefits.

Sacco had 9.9 years of service for the Massachusetts Teachers Retirement System (MTRS) from 1984 to 1994. Sacco withdrew his contributions from MTRS after he left. In February 2020, Sacco bought back his creditable service at MTRS. By doing so, he reached 10 years of creditable service, enough to qualify for a pension and retiree health insurance benefits. Sacco's tenure at WRRS added 38 months to his years of creditable service; it also raised his five-year average salary by adding just over three years' salary of $150,000+ to the pension calculation. At MTRS, Sacco's highest salary was approximately $36,000. The WRRS Board approved Sacco's retirement application at its March 28, 2023 meeting. On June 22, 2023, PERAC approved Sacco's annual retirement allowance of $19,041.84 through monthly payments of $1,586.82 by WRRS.

[14] A retiree's monthly retirement allowance is comprised of two amounts – an annuity and a pension. The annuity portion comes from the withholdings paid into the employee's annuity savings account by the retirement board, along with any accrued interest. The pension portion is the remaining amount the employee is entitled to by law in addition to the annuity.

Sacco received his pension for April, May, and June totaling $4,862.84. On June 30, 2023, he waived his pension, putting the payments on hold. This occurred about the same time that WRRS filed public records requests with retirement boards across the state to get Sacco's invoices from 2020 to 2023.

Section 91(b) of Chapter 32 of the Massachusetts General Laws imposes limits on the amount of work an individual retired from a public body can perform for a public agency, including as a consultant or a contractor. The law also imposes limits on that individual's earnings. In general, a retiree cannot work more than 1,200 hours for a public agency in a calendar year; any earnings that, when combined with the individual's pension, exceed the salary of the position from which the individual retired plus $15,000 is not allowed and the excess must be refunded by the retiree to the retirement system.

After learning that WRRS had requested Sacco's invoices from all his clients and after waiving his pension, Sacco offered to reimburse the entire $4,862.84 in pension payments he had received. PERAC said waivers were prospective only and could not be granted retroactively. Sacco appealed PERAC's decision to DALA. In September 2024, WRRS sent a letter to Sacco stating that Sacco's legal work for other retirement boards in 2023 exceeded his public sector retiree limits. The letter states, "[Y]ou earned $321,911.12 during the 2023 calendar year, prior to the date you waived your benefit, and therefore you over earned by $186,722.77. [That amount] is the amount that needs to be paid to Worcester Regional Retirement System immediately." In April 2025, WRRS sent a demand letter to Sacco for the alleged overearnings. Sacco responded by filing an appeal with DALA and by asking his state representative to file legislation that would limit Sacco's excess earnings liability to $4,862.84, the amount in pension payments he received in 2023. The Board filed suit in August 2025 over his alleged excess earnings.

As noted earlier, Sacco has practiced law for approximately three decades, focusing on public sector pension law and representing public employee retirement boards exclusively. During his career, Sacco has successfully litigated multiple cases involving excessive earnings on behalf of retirement boards, including matters that were appealed all the way to the Supreme Judicial Court. For example, he represented the Plymouth Retirement Board in a matter involving the town's former finance director, Michael Daley, who, following his retirement, worked for various municipalities through a corporation. The Plymouth Retirement Board is seeking to recover more than $1 million from Daley in excess earnings. Sacco's career representing retirement boards, and this specific litigation, indicates that Sacco is well aware of retiree earnings limits. Yet he is now alleged to have breached them himself.

At the same time, Sacco is attempting to avoid the excess earnings law through legislation. Sacco asked State Representative Kelly W. Pease of Westfield, who represents the district where Sacco resides, to file a bill that would limit Sacco's excess earnings liability to $4,862.84, the total of his 2023 pension payments. The bill was referred to the Joint Committee on Public Service, which held a hearing. As of the date of this report, the Legislature has yet to take further action on the bill.[15]

In 2023, WRRS obtained Sacco's invoices to other retirement boards and learned about his absences from the office. Blanchette told the OIG that based on those invoices the Board believes Sacco worked considerably less than full time for WRRS when he was CEO and should not receive creditable

[15] H.2931, "An Act Relative to Earnings Limitations for Michael Sacco for Calendar Year 2023."

service as if he had. In addition to filing suit over Sacco's alleged excess earnings, Blanchette said the Board has discussed challenging whether Sacco should receive full pension credit for the 38 months when he was CEO.

The OIG calculated that the hours Sacco billed clients for attending board meetings, court hearings, and other engagements totaled 105 eight-hour days. The OIG identified at least 60 dates when Sacco's invoices placed him out of the office for at least four hours; on 17 of those dates, he was absent all or nearly all day without using leave. These 38.5 days (17 full days plus half of 43 other days) are another partial measure of the extent to which Sacco worked less than full-time for WRRS. Furthermore, as discussed in Finding 3, Sacco himself told the OIG that he spent only 20 to 30 hours per week working on WRRS matters while employed as CEO.

Finding 9. Sacco made inaccurate representations to the Board.

Sacco repeatedly made representations to WRRS's Board that were not accurate.

As discussed earlier in this report, Sacco verbally promised the Board he would, if hired as CEO, curtail his work for outside clients over a period of time. He promised the Board that he would work full-time for WRRS, that he would not work on outside client matters during WRRS business hours (with an exception for clients that had active court cases), that he would sharply curtail his work for other retirement boards, and that he would immediately begin transitioning his other legal work to associates at his firm. According to Board members and the Board administrator, Sacco promised to "wind down" his firm within a few years.

Sacco did not abide by these promises.

Five days after signing the contract to be the WRRS CEO, Sacco emailed all his clients except WRRS, saying he would continue to run his law firm and serve them for the next decade. In an all-client memo sent on December 1, 2019, Sacco informed his clients:

> "…Beginning on January 6, 2020, in addition to my role as [WRRS's] General Counsel, I will also be taking over Mr. Blanchette's CEO responsibilities. As I indicated to you in my email, these responsibilities will be in addition to my Firm client responsibilities, and while I am fully committed to the CEO position, the [WRRS] understands that I will continue to devote time to Firm clients as needed, which includes attending some retirement board meetings, administrative hearings and court appearances . . . .
>
> I have also made no secret of the fact that it is my intention to retire in 2030, most likely in June of that year. With that goal in mind, my business plan has always been to build the practice and staff the Firm such that it continues and flourishes well beyond my retirement . . . ."

In the emailed memo, Sacco told clients he had just hired another associate to "provide attorney support for Chris Collins and me as we continue to grow and expand the practice."

Each of the five WRRS Board members involved in hiring Sacco was shown a copy of the memo. Each one said they had never seen it before and said they were stunned that Sacco stated he intended to continue running his law practice for another 10 years and to "grow and expand" the firm instead of winding it down.

Furthermore, at the Worcester Retirement Board's January 9, 2020 meeting, Sacco told his clients, "I guess the bottom line is, for you nothing really changes. I still plan on coming to your meetings or if I'm not available Chris will come . . . I don't really see any changes." A board member responded, "When the job was advertised, it was a full-time position. It just sounds like we're going to see Chris more than you." Sacco answered, "No, not necessarily. Over time, as the 10 years winds down, I think I have an obligation to try and transition the firm."

To gauge whether Sacco scaled back his outside work, the OIG compiled all the entries on invoices to his top 20 clients by billings, which accounted for more than 80% of his firm's revenue. For work performed by Sacco himself, the firm billed those 20 clients for 1,211.5 hours ($302,875) in 2020, 1,314 hours ($328,500) in 2021, and 1,270.1 hours ($330,226) in 2022. For the same 20 boards, his firm's total billings for Sacco and the two associates were 2,899 hours in 2020, 3,690 hours in 2021, and 4,209 hours in 2022. These numbers indicate that Sacco did not cut back on the amount of outside legal work while he was the WRRS CEO. The firm's billings grew considerably.

Early in Sacco's tenure as CEO, the COVID pandemic caused some of his retirement board clients to curtail operations and postpone hearings, resulting in a moderate drop in his firm's billings. Sacco responded to the decreased need for legal services by laying off his two associates on April 1, 2020; for several months, he performed all his firm's legal work rather than reduce the amount of work he performed for his non-WRRS clients.

While Sacco was the WRRS CEO, his legal services contracts with at least 14 boards expired; he renewed all 14 contracts. In mid-2022, the Boston Retirement Board issued a request for proposals (RFP) for legal services. Sacco responded and was hired in November 2022, adding the largest municipal retirement board in Massachusetts to his client list.

Additionally, when Sacco was the WRRS CEO, Blanchette and other WRRS Board members questioned him about his absences. Each time, Sacco claimed that he worked in the office almost every day from 9 a.m. to 4 p.m. and that he performed other client work only on his own time – on the weekends, before and after WRRS business hours, and during his lunch break. Staff witnesses, as well as Sacco's invoices and his outside clients' board minutes, evidence that these statements were false.

Furthermore, on multiple occasions, Sacco provided inaccurate information to WRRS about his vacation, leaving for Florida prior to the time he told staff his vacation was starting. By doing so, Sacco benefited in three ways from underreporting his vacation. First, he took more vacation days in a year than he was entitled to. Second, underreporting vacation days allowed him to carry over vacation days to the next year and increase his leave balance each year. Third, when Sacco resigned, he was credited with and paid for at least 16 vacation days that he had already used.

Finding 10. Sacco made inaccurate representations to the OIG during its investigation.

In an interview with the OIG on January 30, 2025, Sacco described his work pattern when he was the WRRS CEO. Sacco stated that he was in WRRS's office from 9:00 a.m. to 4:00 p.m. almost every day, just as he told the Board when questioned about his absences. He said he typically left his home in Southampton at 7:30 a.m., taking the Massachusetts Turnpike and arriving at WRRS's office in Auburn about 8:30 a.m. He said he usually left the office between 3:30 p.m. and 4:00 p.m. Sacco said that on days when he attended another board's meeting or appeared in court, he would typically first drive to the WRRS office, leave for that day's engagement, and return to the office. He said he was in the WRRS office every day with only one or two exceptions and that he was absent during work hours "from time to time." When asked if his toll transponder records would corroborate his statements, Sacco said, "I imagine they would." However, he refused to provide them to the OIG, saying "I'm not going to help you hang something around my neck." He added that the OIG's investigation was "ridiculous."

Both the hours Sacco claimed to have worked and his statement that he was in the office "almost every day" were not accurate.

During his interview with the OIG, Sacco acknowledged that he routinely attended outside clients' board meetings by videoconference while at the WRRS office at whatever point in the day they were scheduled. He said that his other outside work – file reviews, drafting memos and legal briefs, letters, emails, and placing telephone calls – was conducted exclusively during his lunch hour. Sacco stated categorically that, with the exception of remotely held board meetings, he scrupulously refrained from conducting private firm work while at the WRRS office during WRRS work hours. That statement was not true.

When the OIG asked how many meetings, hearings, and other appearances he made during his three years at WRRS, he said, "I have no idea. Look at my billings." Sacco was told his bills indicated he attended more than 300 events with or on behalf of his outside clients. He said all of those were allowed under his contract. He said that his contract permitted him to attend any board meetings or other engagements for private clients under the terms of his contract, as long as they did not interfere with his CEO duties. Sacco said that he was "hired to do a job" and that as long as he did everything that WRRS needed from its CEO, the hours he worked were irrelevant.

At one point in the interview, the OIG asked Sacco why he did not use vacation time when he attended a New Bedford Retirement Board meeting for which he billed 6.5 hours. He answered, "They let me do this. I had carte blanche as long as I got the Worcester Regional work done, so why would I use leave?" The OIG asked about numerous other dates that he attended meetings without using vacation time. Each one, he said, was allowed. However, all of the Board members told the OIG that Sacco, when questioned about his work hours or absences, claimed (falsely) that he was in the office from 9 a.m. to 4 p.m. None of the Board members said that he responded that he was allowed to be absent without using vacation time or allowed to not use vacation time for his travel days. Given these contradictory answers depending on whom he was speaking to, the OIG does not find any credibility in Sacco's claim that he believed these actions were permitted.

Finding 11. Sacco failed to fully disclose known active investigations into his conduct when he responded to other retirement boards' RFPs for legal services.

Between 2024 and 2025, Sacco responded to many RFPs soliciting work for various retirement boards.

In 2024, the Belmont Retirement Board issued an RFP for legal services. The RFP required each respondent to disclose "any disciplinary findings, judgments, criminal convictions, investigations or litigation pending against the attorney or law firm."

Sacco responded to the RFP on March 26, 2024. As Sacco knew at the time, the State Ethics Commission had opened an inquiry on January 5, 2024, into Sacco's conduct while serving as the WRRS CEO. He also knew that the OIG had contacted his clients and requested Sacco's invoices, contracts, and other documents. However, in response to the disclosure requirement, Sacco's proposal stated, "Neither Attorney Sacco, who is the sole Firm officer, nor Attorneys Collins and Kenyon have been the subject of any judgment, criminal conviction, investigation or litigation."

On November 20, 2024, Sacco submitted proposals in response to an RFP for legal services issued by the Taunton Retirement Board, a longtime client. Sacco did not disclose the State Ethics Commission's 10-month-old inquiry or the OIG's investigation in his submissions to that board.

In 2025, many boards' contracts were expiring, including those of many of Sacco's clients. That year Sacco responded to at least 20 RFPs for legal services. All but one[16] of the 20 RFPs contained two sections that required respondents to disclose current or past investigations. A section labeled "Pending Litigation" required respondents to disclose:

> "Details of any pertinent judgment, criminal conviction, investigation or litigation pending against the bidder or any of its officers, directors, employees, agents, or subcontractors of which the bidder has knowledge or a statement that there are none. The Board reserves the right to reject a response based on this information."

Sacco's proposals all included a three-paragraph statement in which he disclosed that on January 5, 2024, the State Ethics Commission had opened an investigation into his conduct as the WRRS CEO. Sacco's statement said that the WRRS Board had "initiated [the investigation] in bad faith based on false and misleading information." The statement noted that the Board "awarded Attorney Sacco performance bonuses for his work as CEO for calendar years 2020 and 2021." The statement continued, "On December 19, 2024, after a full investigation into the baseless allegations, the Commission notified Attorney Sacco that the preliminary inquiry had been terminated, as there was no evidence of impropriety and

[16] The RFP issued by the retirement board for the city of Worcester contained different disclosure language: "List any formal complaints, claims, legal actions or other proceedings filed with the regulatory agencies, administrative agencies, arbitrators or courts against individuals or the entity as a result of pension legal services provided by the firm and/or its staff within the last (5) years." Sacco submitted his proposal on September 24, 2025, after he had received notice that WRRS had filed its excess earnings lawsuit against him. Sacco did not disclose the litigation.

wrongdoing." None of his 2025 proposals disclosed that the OIG was investigating his conduct, which he was aware of in December 2023.

Of the 20 RFPs Sacco responded to in 2025 which the OIG reviewed, six were submitted after WRRS's lawsuit over alleged excess earnings had been served on him.[17] Sacco did not disclose the WRRS litigation against him to any of the boards. Sacco's submissions to the Reading and Belmont retirement boards affirmatively stated, "There is no litigation in which the Firm or any of its lawyers or staff are defendants." Those were false statements.

In late 2025, Belmont issued another RFP for legal services because its primary counsel was retiring. The RFP included the same requirement to disclose any investigations pending against him, his associates, or his firm. Sacco responded to this RFP on January 7, 2026; his response included the three-paragraph statement about the Ethics Commission investigation, but did not disclose the OIG's investigation or the WRRS lawsuit.

Each of the RFPs required respondents to include a cover letter, adding, "The cover letter must certify that all of the information contained in the submission is accurate and complete. Inaccurate or incomplete information might affect the submission adversely."

II. As to the WRRS Board

Finding 12. The Board signed an employment agreement with Sacco that lacked well-defined limits on Sacco's outside work activities.

The OIG interviewed the five WRRS Board members involved in hiring Sacco. All five acknowledged that they knew Sacco's firm represented dozens of other retirement boards. They said that they wanted a full-time CEO in the office and that they were concerned that Sacco could not work full time as the WRRS CEO while continuing to work for all of his other clients. They said that Sacco's continued work for those clients was discussed repeatedly during the hiring process in 2019.

A draft employment agreement presented to Sacco had language stating that Sacco "intends to wind down his law practice" as he transitions to work full time as WRRS's CEO. The draft agreement stated, "The Board recognizes that in the initial year of employment, the CEO may need to be absent from time to time for the purpose of winding down or transferring certain ongoing matters, including . . . attending hearings or meeting with clients." Sacco responded to the Board that such language was too restrictive. Although Sacco promised to conduct private work only on his own time, to be in the office every day, and to be WRRS's full-time CEO, the Board did not put those promises in writing. At that point, Board members should have considered Sacco's objections a warning sign, indicating at a minimum that more negotiations were needed to determine what promises he would agree to in writing and whether the Board was amenable to such terms.

The Board members told the OIG that they ultimately agreed to remove the language Sacco objected to because they were relying on Sacco's verbal assurances that he would substantially reduce

[17] WRRS filed suit on August 27, 2025; Sacco was served on September 13, 2025.

his outside workload within a reasonable time frame and that he would not perform other clients' legal work during WRRS business hours. They said that because Sacco had represented the Board for more than a decade and was an attorney, they believed that he could be trusted to keep his word and that explicit boundaries did not need to be written into the contract. The only specific requirement in the employment contract governing Sacco's work for outside clients was the obligation to report his absences to the Board monthly.

The OIG finds the approach of adopting loosely defined limits on the CEO's work for private clients to be wholly ineffective. As with any business relationship, a contract should not be drafted in a way that anticipates and relies on each party acting in the other's best interests purely through good faith. Contract terms should protect the interests of both parties in the case that conflict does arise. In this case, the contract should have set clear boundaries, prohibiting Sacco from using WRRS resources (including its office) to conduct any private business, even during his lunch break, to avoid a slippery slope that could lead to abuse, as was the case here. Furthermore, the contract should have set strict rules regarding what hours he was expected to work each day for WRRS, what types of outside work Sacco could do, how long he had to wind down such outside work, and how he would need to disclose or get approval for such outside work. Particularly given Sacco's testimony that he believed returning a single phone call or responding to a single email was sufficient to constitute doing a full day's work for WRRS, the OIG finds that more precise specifications regarding the Board's expectations of the CEO's work commitments to WRRS would be advisable for future contracts.

Finding 13. The Board's policy regarding annual front loading of vacation for the CEO, which was not afforded to WRRS employees, resulted in a greater payout for Sacco's vacation time.

Unlike WRRS employees who receive vacation days though an accrual-based process over the course of the year, the Board allowed annual front loading of vacation days for the CEO. This inequitable system allowed Sacco to be paid out for vacation days that an employee of WRRS, resigning at the same time of the year, would not have earned in the same manner. Because Sacco resigned in March 2023, he received a greater payout of vacation time than WRRS would have had to pay under an accrual system. As a fiduciary of the retirement system it manages, the Board should not allow front loading of vacation days for the CEO, or any employee.

Finding 14. The Board failed to adequately monitor Sacco's performance and attendance problems, including requiring and reviewing monthly outside activity reports, and further failed to adequately respond to Sacco's conduct once it was discovered in order to dissuade such conduct from continuing.

Sacco routinely attended other retirement boards' monthly meetings, as well as court and administrative hearings, as he had prior to becoming CEO at WRRS. This practice continued throughout his tenure at WRRS. Sacco did not report these absences to the Board and rarely reported his absences to the Board administrator.

The OIG found little evidence that Board members ever took meaningful steps to enforce the reporting requirement, even after staff reported Sacco was frequently out of the office and using his office

for non-WRRS-related work. For example, as the Board chair, Blanchette could have included an item on each monthly Board meeting's agenda for Sacco to disclose any absences during the prior month. Doing so would have relayed to Sacco that the Board had serious concerns about his time spent working outside WRRS. Knowing he would be asked at each Board meeting to disclose his absences would have forced him to either disclose when and for whom he performed outside work, or to lie about his outside engagements and risk facing the consequences. Because the Board almost never confronted Sacco about his absences, Sacco remained silent and failed to report them. Had the Board taken such a step, it might have discovered the extent of Sacco's outside work earlier and taken appropriate action.

The Board also gave Sacco a $5,000 merit bonus in spring 2021 after hearing from staff that he was frequently absent. Compounding their error, Board members gave him another $5,000 bonus again in 2022, despite knowing that he had continued to be frequently absent. While Board members said they had serious misgivings about some of Sacco's conduct, they voted two years in a row to pay him the maximum allowable bonus under his contract. Blanchette told the OIG that the Board hoped the bonuses would be an inducement to Sacco to curtail his non-WRRS engagements; however, in his OIG interview Sacco referenced the bonuses as an affirmation of his conduct and proof that he did not need to change his practices. Furthermore, Sacco referenced these bonuses in all of his responses to RFPs for legal services in 2025, suggesting that they were indicative of the Board's strong approval of his performance as CEO. The Board's action in providing Sacco these merit bonuses did not affirmatively address Sacco's poor performance, but instead provided him positive reinforcement. This clearly demonstrated improper oversight, supervision, and management of Sacco, and was clearly not in WRRS's best interests.

Following Sacco's March 2023 resignation and retirement, WRRS sent public records requests for Sacco's invoices to every retirement board in Massachusetts. Board members told the OIG that, after receiving those records, they were shocked to learn how many outside engagements Sacco attended while he was CEO. They stated that, although they had heard anecdotally about Sacco's absences, they did not appreciate the sheer scope of the outside work he had been doing. However, information showing Sacco's attendance at non-WRRS board meetings was publicly available throughout his tenure. Like WRRS itself, Sacco's clients are public bodies, and most retirement boards regularly post meeting minutes that would have provided details of Sacco's attendance and the times of such meetings. If the Board had discovered how often Sacco attended other meetings sooner, it might have taken decisive action more quickly.

By and large, Board members said that they bear a share of responsibility for Sacco's extensive absences. During their interviews, more than one Board member said "shame on us" for approving a flawed contract, trusting Sacco's verbal assurances, and not supervising him more diligently.

Finding 15. The Board's failure to terminate Sacco's employment after his poor performance resulted in a larger pension for Sacco.

After the Board confronted Sacco during his annual performance review on January 31, 2023, for "at least the 5th time" about his absences from the office and his prioritization of firm clients above his commitment to WRRS, Sacco asked the Board to allow him to resign rather than fire him. The Board agreed to allow Sacco to resign, which he did on March 9, 2023.

If the Board had taken action sooner, Sacco would have likely left WRRS earlier with a commensurately smaller pension. The OIG calculated that if Sacco had departed WRRS a year earlier, his annual pension allowance would have been approximately $13,625 – about $5,500 less than his pension calculated by PERAC.[18]

As mentioned in Finding 2, the OIG calculated that, during his tenure as the WRRS CEO, Sacco billed his private clients for attending board meetings, court hearings, and other engagements, for the equivalent of 105 eight-hour days. Based on this information, the OIG questions whether the employment certification that WRRS provided to PERAC is in fact accurate and whether WRRS has an obligation to revisit its calculation and affirmatively contact PERAC with its updated findings. The OIG concludes that, to more accurately reflect the realities of Sacco's employment with WRRS, Sacco should likely have his creditable service time reduced for pension purposes.

[18] The calculation assumed Sacco resigned on March 9, 2022, and retired at age 60 and chose Option C (survivor's benefit) as he did when he actually retired in 2023.

RECOMMENDATIONS

As the OIG's findings demonstrate, Sacco violated his duties to WRRS, the Board, WRRS members, and the government entities that make up the system. Furthermore, the Board failed to set effective rules to govern the CEO's conduct and did not provide meaningful oversight and accountability during Sacco's tenure. The OIG therefore offers the following recommendations to address the problems identified in this report and to prevent such mismanagement and misconduct from occurring in the future.

For the Board:

Related to Sacco's tenure:

1. Pursue recovery from Sacco of overpayment of vacation time connected to his failure to honestly report vacation days.
2. Attempt to have Sacco's creditable service reduced by the Public Employee Retirement Administration Commission (PERAC) to accurately reflect the fact that he worked less than full time for WRRS.
    a. Calculate an estimate of the days Sacco worked less than full time for WRRS.
    b. Withdraw WRRS's original certification of Sacco's employment history sent to PERAC to calculate his retirement benefit.
    c. Provide the recalculated data to PERAC with a request that Sacco's length of service be adjusted accordingly.
3. Continue reasonable and prudent efforts to recover any excess earnings Sacco received in 2023.

Related to current and future CEOs/Executive Directors:

4. Review the contract with the current executive director, ensuring it clearly expresses the expectation that she work full time for WRRS during its business hours, which should be specified.
5. Enact a policy that staff members, including the executive director, who conduct approved outside activities during the business day must (1) use a corresponding amount of leave time; and (2) refrain from using WRRS facilities or WRRS assets or equipment for any outside work.
6. Require that the WRRS CEO receive vacation leave on an accrual basis, as is the case with all other WRRS employees.
7. Seek training for all current and future Board members and senior staff on fiduciary obligations and responsibilities.

8. Ensure that the Board understands how to properly manage the CEO and hold them accountable for accomplishing all categories of the CEO's work responsibilities.

9. Determine an objective method for awarding the CEO any potential bonuses, including documenting such process and voting to authorize any such bonuses.

For Michael Sacco:

10. Repay WRRS for the inflated vacation payout he received when he resigned, which included 16 days when he was on vacation that he did not report to WRRS; the OIG calculated this overpayment to equal $11,945.

11. Repay to WRRS any overearnings that he is found to owe as his dispute with WRRS is fully litigated or resolved.

12. Notify all retirement boards for which he made a procurement proposal that failed to properly disclose current or past criminal investigations, regulatory proceedings, or material litigation, including Belmont, Reading, Taunton, and the 20 RFPs he responded to during 2025.

For the Legislature:

Related to Sacco's excess earnings exemption bill:

13. Rep. Kelly Pease of Westfield should consider withdrawing his support for the legislation he filed, House Bill 2931, to exempt Sacco from the post-retiree earnings cap, based on this investigation's findings.

14. The House and Senate chairs of the Ways and Means and Public Service committees should review this report, consider House Bill 2931 in light of this report, and proceed cautiously with advancing any other post-retirement cap exemption legislation.

Related to the 104 retirement systems across the Commonwealth:

15. Consider working with PERAC, the Executive Office for Administration and Finance (A&F), and the Department of Revenue (DOR) on drafting legislation to provide proper oversight of retirement systems and adopt necessary changes to post-retirement rules.

    a. Set up a centralized system that pulls both Commonwealth and municipal retiree data to easily determine the maximum post-retirement earnings per individual, and provide PERAC with the necessary funding to run it.

    b. Establish clear statutory language requiring public entities to determine if a hired employee is collecting a public pension, require classification of such employees as "post-retirees" in public payroll systems, add measures to track their post-retirement earnings cap, and report such information to PERAC.

c. Simplify the earnings cap by basing it on the "calculated retirement salary average" (CRSA) and create a central annual adjustment process managed by PERAC so that each retiree's cap can be easily calculated, maintained, and updated with any applicable increases.

d. Require PERAC to annually report earnings caps to all public retirees who performed post-retirement work during the prior calendar year.

e. Enact disclosure and reporting requirements for public employers, public retirees, and public retirement boards to help PERAC monitor post-retirement employment.

f. Simplify the current system so that any public retiree can determine their post-retirement earnings limit by entering their CRSA and current pay rate into an online calculator.

g. Establish a financial penalty for public retirees who knowingly and willfully exceed their post-retirement earnings cap.

h. As an alternative to the CRSA, implement an annual salary cap that applies to all Massachusetts municipal and Massachusetts state public retirees returning to work.

16. Consider simplifying the administration and structure of the Commonwealth's 104 retirement systems, reviewing potential opportunities to, at a minimum, consolidate administrative oversight and incorporating policy recommendations from this report and the OIG's March 2024 report on post-retirement employment.

For other pension boards:

17. Request that all 104 pension board chairs and executive directors review this report.

For the 50+ pension boards that employed Sacco:

18. Cooperate with WRRS's efforts to estimate Sacco's work for other boards to help determine how much creditable service he earned while holding the CEO position.

19. Review records from the period Sacco worked at WRRS to ensure that the Board received services paid for, including hours Sacco claimed to have worked.

20. Review rules and best practices on procurements for services.

21. Review best practices on verifying and reconciling bills and payments.

For PERAC:

22. Cooperate with WRRS regarding a review of Sacco's eligible service.

23. Work with the Board to determine if Sacco's creditable service needs to be readjusted in light of facts uncovered in this investigation.

24. Review this report's findings about Sacco's conduct and WRRS's management failures to determine whether new regulations, guidance, or sanctions on retirement systems, officials, or vendors are warranted.

25. Work with the Legislature, the Administration, and the OIG to implement Recommendation 15 as detailed above.

For the Secretary of A&F:

26. Consider recommending to the Governor that she veto House Bill 2931 or any other legislation that may emerge exempting Sacco from the state's excess earnings statute for 2023 if the bill advances.

27. Support efforts to enact reforms to the state's public employee retirement system, including whether to reduce the number of separate systems from the current number of 104.

28. Collaborate with PERAC, the Legislature, and the OIG to implement Recommendation 15 as detailed above.

APPENDIX A. RETIREMENT BOARDS REPRESENTED BY SACCO IN HIS PRIVATE CAPACITY DURING HIS TENURE AS THE WRRS CEO

Michael Sacco represented 53 retirement boards between January 6, 2020, and March 9, 2023, while simultaneously working as CEO of the Worcester Regional Retirement System.[19]

1. Adams Retirement Board
2. Amesbury Retirement Board
3. Andover Retirement Board
4. Beverly Retirement Board
5. Braintree Retirement Board
6. Bristol County Retirement Board
7. Chelsea Retirement System[20]
8. Chicopee Retirement Board
9. Clinton Retirement Board
10. Essex Regional Retirement Board
11. Fairhaven Retirement Board
12. Fall River Retirement Board
13. Franklin Regional Retirement Board
14. Gardner Retirement Board
15. Greater Lawrence Sanitary District Employees' Retirement System
16. Haverhill Retirement Board
17. Hull Retirement Board
18. Lawrence Retirement Board
19. Lexington Retirement Board
20. Lowell Retirement Board
21. Malden Retirement Board
22. Marblehead Retirement Board
23. Marlborough Retirement Board

[19] Sacco represented an additional two boards that became his clients during his tenure as the WRRS CEO. The Boston Retirement Board hired Sacco in November 2022 and the Minuteman Regional School District Retirement Board hired Sacco in July 2021.

[20] Sacco's representation of the Chelsea Retirement System was limited to one case.

24. Massachusetts Housing Finance Agency Retirement Board
25. Medford Retirement Board
26. Melrose Retirement Board
27. Methuen Retirement Board
28. Natick Retirement Board
29. Needham Retirement Board
30. New Bedford Retirement Board
31. Newburyport Retirement Board
32. North Adams Retirement Board
33. Peabody Retirement Board
34. Pittsfield Retirement Board
35. Plymouth County Retirement Board
36. Plymouth Retirement Board
37. Quincy Retirement Board
38. Reading Retirement Board
39. Saugus Retirement Board
40. Shrewsbury Retirement Board
41. Southbridge Retirement Board
42. Stoneham Retirement Board
43. Swampscott Retirement Board
44. Taunton Retirement Board
45. Wakefield Retirement Board
46. Waltham Retirement Board
47. Webster Retirement Board
48. Wellesley Retirement Board
49. Westfield Retirement Board
50. West Springfield Retirement Board
51. Weymouth Retirement Board
52. Winthrop Retirement Board
53. Worcester Retirement Board

APPENDIX B. WRRS CEO JOB DESCRIPTION, AS APPENDED TO SACCO'S EMPLOYMENT CONTRACT

Chief Executive Officer

Summary Description:

Organizes and executes legislative and public relations policies and programs to develop and maintain employer, member, legislative and other interested parties understanding and good will towards the organization. This position is proactive in addressing public sector/retirement system issues with solutions that protect and enhance the Retirement Board. Plans, organizes, develops and oversees the Retirement Board's administrative activities to accomplish organizational objectives and to optimize the utilization of resources at minimum cost.

Primary Duties and Responsibilities:

1. Analyzes proposed administrative and legislative actions as to their actual or prospective impact on the Retirement Board and guides the Board in the development of its position on such proposals. Recommends actions to be taken and takes those actions necessary to make the Board's position known to governmental agencies and legislative delegations.

2. Promotes effective relationships with public officials and their staffs, participating employers, union representatives, and other professional groups. Communicates official plans, policies and procedures to general public. Represents the Retirement Board with federal, state, and local government agency personnel. Calls upon local, state, and federal agency officials and staff periodically to discuss current issues involving the Retirement Board and the retirement industry.

3. Directs, coordinates and oversees consultants and other advisors to the Retirement Board including actuary, investment advisor, auditor, and investment managers. Establishes proper measures of performance, counsels managers as to execution of programs and when necessary, provides direction for modification or remediation of plans.

4. Develops and implements an organizational plan, consistent with and appropriate to accomplishment of long and short-range established objectives and which will enhance the operational effectiveness of the organization.

5. Directs and coordinates a broad range of staff and service functions that provide support, service and assistance to the Retirement Board. Provides clear leadership to the organization and delineates responsibilities and authority for staff. Trains, motivates, and evaluates staff; reviews progress and directs changes as needed.

6. Ensures that effective business systems, procedures, and financial controls are established and maintained for the administrative operations.

7. Plans, directs, and controls the Retirement Board's overall financial plans and policies, accounting practices, and relationships with financial institutions. Directs the banking, credit, and investment functions of the Retirement Board including the procurement, custody and investment of funds and other financial assets.

8. Provides guidance and counsel to the Retirement Board on all legal issues and matter including the drafting of all related memoranda, pleadings and legal briefs. Represent the Retirement Board in all legal forums, including but not limited to appeals and/or civil actions brought before the Division of Administrative Law Appeals, Contributory Retirement Appeal Board, District Court, Superior Court and Massachusetts Appellate and Federal Courts.

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