

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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September 10, 2019

Brenda Brown
35 Grafton Street
Shrewsbury, MA 01515

Re: CPF 19-64

Dear Ms. Brown:

This office has completed its review of a complaint we received regarding your 2019 campaign for Housing Authority in Shrewsbury. Specifically, the complaint alleged that you failed to organize a committee and disclose expenditures for a town-wide mailing.

You indicated that you did not receive any contributions from individuals for your campaign expenditures, as you self-funded your campaign in its entirety. You further indicated that your largest expenditure, to the Massachusetts Republican State Committee (the "MRSC"), was a payment in full to the MRSC for a mailing the MRSC printed and distributed on your behalf.¹ While all of your expenditures (totaling approximately \$4,500) were disclosed in the campaign finance reports filed 8 days before and 30 days after the May 7, 2019 election, neither of those reports reflected any receipts from you or any other individuals.

M.G.L. c. 55, § 18 requires all candidates to file campaign finance reports that accurately and timely reflect all campaign finance activity in the relevant reporting period, including all contributions received and expenditures made. This includes any out-of-pocket expenditures made by candidates on behalf of their own campaigns. In those circumstances, candidates who file on paper with their local election officials are advised to reflect their out-of-pocket expenditures as both a contribution from themselves to their campaign on Schedule A of the campaign finance report, and an expenditure to the vendor on Schedule B.² This method ensures the most accurate disclosure of a candidate's campaign finance activity. In addition, although candidates must file regular campaign finance reports with either the local election official or OCPF, the campaign finance law does not require self-funded candidates to organize a committee on their behalf.

After being contacted by OCPF, you fully cooperated with our review and promptly filed amended reports to accurately disclose your out-of-pocket expenditures as both contributions to and

¹ You reported an expenditure to the MRSC for \$2,150, for "coordinated mail services." The MRSC, on its own reports, disclosed expenditures for printing for your campaign in the total amount of \$1,161.64. The remaining \$988.36 you paid to the MRSC represented the MRSC's postage costs for the mailer. The MRSC confirmed that your payment of \$2,150 represented payment in full for all costs the MRSC incurred for your mailing.

² In addition to reflecting his or her out-of-pocket expenditures as both a receipt on Schedule A and an expenditure on Schedule B, a candidate hoping to be repaid in the future may also choose to reflect the expenditure as a liability on Schedule D from the campaign to the candidate. This is referred to as the "ABD" method of disclosure, and is only appropriate for local filers who file on paper with the local election official.

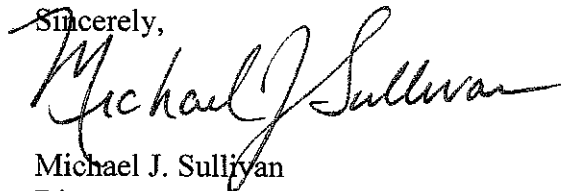


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expenditures from your campaign. Because the initial nondisclosure was the result of a lack of knowledge regarding the technical requirements of the campaign finance law, and because OCPF believes that the guidance provided during the course of this review will ensure future compliance, we have determined that no further action is required and this matter may be closed at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a large, stylized initial "M".

Michael J. Sullivan
Director

MJS/mc