



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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July 18, 2019

Patricia Switchenko, Treasurer
Cape Cod Republican Club Political Action Committee
P.O. Box 656
West Hyannisport, MA 02672

Re: CPF-19-80

Dear Ms. Switchenko:

This office has completed its review of recent bank reports filed on behalf of the Cape Cod Republican Club Political Action Committee (the "PAC"). As a result of our analysis, we have concluded that the PAC's activity to support Representative Randy Hunt's ("Hunt") 2018 re-election campaign did not comply with M.G.L. c. 55, the Massachusetts campaign finance law.

In October 2018 and November 2018 the PAC made two payments totaling \$1,940 for radio advertisements supporting Hunt. The first payment was to Cape Cod Radio for \$1,500 on October 23, 2018 and the second payment, \$440, occurred on November 1, 2018 to iHeartMedia. M.G.L. c. 55, § 6 limits the amount that a political action committee can contribute to a candidate's committee to \$500 in a calendar year. The PAC's expenditures for radio advertisements resulted in an excess (in-kind) contribution of \$1,440 to Hunt.

This matter was brought to our attention in January 2019 and OCPF assisted the PAC and Hunt in resolving this issue. The PAC did not recognize that the expenditures constituted an excess contribution. Hunt refunded the PAC \$1,440 in January 2019. However, the PAC's May 2019 bank report disclosed another payment of \$750 to iHeartMedia for radio advertising to support Hunt. The PAC indicated to OCPF that this was a payment for an outstanding invoice for radio ads supporting Hunt in the 2018 election. Although the payment occurred in May 2019, this \$750 must be considered an excess for the 2018 calendar year since the ads aired to support Hunt during the 2018 election cycle.

OCPF contacted the PAC and Hunt once this expenditure was identified. Hunt refunded the \$750 to the PAC on June 27, 2019. The PAC has also amended their 2018 Year-End Report to disclose a \$750 liability to iHeartMedia.

To ensure future compliance with the campaign finance law, you, as the PAC's new treasurer, have agreed that the PAC will not make any contributions (monetary or in-kind), or independent expenditures to support Hunt through December 31, 2020.



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OCPF has determined that this matter may be closed at this time since remedial action has occurred and because we believe that the guidance provided during the course of this review will ensure future compliance with the campaign finance law. Please note that further instances of noncompliance with the campaign finance law may result in referral to the Attorney General, in accordance with Section 3 of the campaign finance law.

In accordance with an opinion from the Supervisor of Public Records, this letter is a public record. If you have any questions regarding this matter or on any issues of future compliance with the campaign finance law, please contact the office.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a long horizontal line extending to the right.

Michael J. Sullivan
Director

MJS/mj

cc: Representative Randy Hunt
Hunt Committee