



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

ONE ASHBURTON PLACE, ROOM 411
BOSTON, MASSACHUSETTS 02108

MICHAEL J. SULLIVAN
DIRECTOR

TEL: (617) 727-8352
(800) 462-OCPF
FAX: (617) 727-6549

November 23, 2015

Michael Gaffney
1 Bancroft Teller Road
Worcester, MA 01609

Re: CPF 15-75

Dear Mr. Gaffney:

This office has completed its review of several complaints we received alleging that your committee, the Gaffney Committee (the Committee), did not disclose expenditures made for campaign ads posted in the Turtleboy Sports blog.

Based on our review, we have determined that there is no reason to believe the Committee violated M.G.L. c. 55, the Massachusetts campaign finance law.

The Committee received invoices from the vendor and has made, and continues to make, payments for digital advertising services. Copies of invoices provided to OCPF show that the Committee was charged and is paying the vendor \$400 per month for a series of campaign ads, the first of which appeared in the blog in July, 2015. The first invoice for the ads, dated July 27, contained a due date of August 26. The Committee paid that amount on time and the payment was processed by the Committee's depository bank on September 17. Additional payments of \$400 for ads cleared the Committee's bank on October 2 and November 4.

Disclosure of expenditures in the depository system occurs when expenditures actually clear a committee's bank. There is generally a lag between the date when services are provided and the date when the expenditure for the services is posted in a committee's expenditure reports. It appears that the Committee is making expenditures for the digital ads in a timely manner, and the expenditures are being disclosed by the Committee's bank, as required by the campaign finance law.

In accordance with the Opinion the Supervisor of Public Records, this letter is a public record. If you have any questions regarding this or any other campaign finance matter, we encourage you to contact us.

Sincerely,

Michael J. Sullivan
Director

MJS/gb

