



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

ONE ASHBURTON PLACE, ROOM 411
BOSTON, MASSACHUSETTS 02108

WILLIAM C. CAMPBELL
DIRECTOR

TEL: (617) 979-8300
(800) 462-OCPF
FAX: (617) 727-6549

August 30, 2023

Wayne Griffin
c/o Thomas R. Kiley, Esq.
CEK Boston, P.C.
One International Place, Suite 1820
Boston, MA 02210

Re: CPF-22-32

Dear Mr. Griffin:

This office has completed its review of certain contributions made to the Eric Lesser Committee (the "Committee") during his 2022 race for Lieutenant Governor. For the reasons set forth below, OCPF has determined that you did not comply with certain provisions of M.G.L. c. 55, the Massachusetts campaign finance law.

Based upon an internal review, OCPF noted eight contributions made by employees of Wayne Griffin Electric, Inc. to the Lesser Committee in June of 2022. Each of the eight employees contributed \$1,000 shortly after you made a \$1,000 contribution to the Lesser Committee in April of 2022. During the course of this review, you acknowledged that you provided each of the eight Wayne Griffin Electric, Inc. employees with \$1,000 cash to reimburse them for their contributions to the Committee. The funds used to make the reimbursements were your personal funds, and not the funds of Wayne Griffin Electric, Inc.

M.G.L. c. 55, § 10 prohibits any person or entity from making political contributions in the name of another for the purpose of disguising the true origin of the contributions. Based on OCPF's review, this office has determined that, by using your personal funds to reimburse your employees for their contributions to the Committee, you were the true source of the funds contributed to the Committee in your employees' names, which did not comply with Section 10 of the campaign finance law.

In addition, Section 7A of the campaign finance law limits individual contributions to Massachusetts candidates to \$1,000 per candidate, per calendar year. By making a direct, personal contribution of \$1,000 to the Committee in April of 2022, and then reimbursing eight other individuals for contributions they made to the Committee in June of 2022, you actually made nine contributions to the Lesser Committee, totaling \$9,000. Eight of those contributions, totaling \$8,000, were excess contributions that did not comply with the individual contribution limits set forth in Section 7A.



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OCPF does not believe that the Committee had any knowledge that the contributions were made with funds provided by another until informed by OCPF during the review. The contributions were made with personal checks, drawn on the checking account of each individual contributor. It appeared, on its face, that these checks were contributed by the eight individuals using their personal funds. The Lesser Committee has agreed to disgorge \$8,000, which represents the total amount of prohibited contributions received by the Committee as referenced in this letter. The disgorgement will be made, consistent with the residual clause of M.G.L. c. 55 § 18, no later than September 22, 2023.

To resolve this matter, you have made a payment to the Commonwealth in the amount of \$10,000. Because OCPF believes that the guidance provided during the course of this review will ensure future compliance with campaign finance law, this matter may be closed at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a public record. A copy may also be provided to the person(s) who brought this matter to our attention.

Sincerely,

A handwritten signature in black ink, appearing to read "William Campbell", written in a cursive style.

William Campbell
Director

WCC/ef

cc: Meredith Lerner Moghimi, Treasurer, Lesser Committee