



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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March 22, 2016

Margaret Laforest
236 Rock Island Road
Quincy, MA 02169

Re: Disclosure of Campaign Finance Activities; CPF 15-81

Dear Ms. Laforest:

This office has completed its review of a complaint we received concerning the disclosure of your Committee's financial activity during the 2015 Quincy city election. The complaint alleged that your Committee failed to disclose expenditures made or in-kind contributions received in connection with a campaign event held at Louis Restaurant.

Sections 18 and 19 of the Massachusetts campaign finance law, Chapter 55, require the filing of timely and accurate campaign finance reports. Reports must reflect all contributions, including in-kind contributions made to the Committee, and all expenditures made by the Committee.

Section 8 of the Massachusetts campaign finance law states that business corporations may not "directly or indirectly give, pay, expend or contribute, or promise to give, pay, expend or contribute, any money or other valuable thing for the purpose of . . . promoting or preventing the nomination or election of any person to public office," and that political committees organized on behalf of a candidate may not "solicit or receive from such corporation . . . any gift, payment, expenditure, contribution or promise to give, pay, expend or contribute for any such purpose." Violations of Section 8 are subject to substantial penalties and the office closely reviews any situation involving the potential use of corporate resources to support or oppose a candidate.

When OCPF contacted you, you stated that you had not received an invoice for the event at Louis, which was held on August 26, 2015. It was not until after OCPF contacted you that the Committee paid \$290 on October 7 to Louis for the event. The failure to promptly pay a restaurant for the value of services provided was not consistent with Section 8.

During OCPF's review, you also indicated that your Committee had held events at several other establishments. To the extent payments were not made to other venues for similar events, the Committee should have included in its year-end report that it received in-kind contributions personally from the owners of the restaurants, who each then paid their establishments for the value of the services received by your Committee. Initially, the Committee's year-end report disclosed



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the individuals who contributed, but did not include accurate amounts of the in-kind contributions. After OCPF contacted you again in late January, you amended your reports to include the exact amounts of the contributions.

After being contacted by this office, your Committee acknowledged the reporting issues and now fully understands the corporate contribution prohibition of Section 8. Accordingly, since the year-end report is now substantially accurate, and we believe that this letter will ensure future compliance with the campaign finance law, OCPF has determined that no further action is warranted and 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. If you have any questions regarding this letter or any other campaign finance matter, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Sullivan". The signature is written in black ink and includes a horizontal line at the end.

Michael J. Sullivan
Director