



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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February 6, 2019

Senator Patrick O'Connor  
340 Pleasant Street #B  
Weymouth, MA 02190

Re: CPF 18-121

Dear Senator O'Connor:

This office has completed its review of a complaint we received concerning the Committee to Elect Patrick O'Connor (the "Committee"). The complaint alleged that the Committee received contributions from individuals affiliated with LStar Ventures, Inc. ("LStar"), and that LStar may have reimbursed the individual contributors for their contributions. For the reasons stated below, there is no reason to believe the Committee, LStar, or the LStar employees who contributed to the Committee violated M.G.L. c. 55, the Massachusetts campaign finance law.

M.G.L. c. 55, § 10 prohibits any person from "directly or indirectly...[making] a campaign contribution on any name except his or her own nor in any manner for the purpose of disguising the true origin of the contribution...unless he makes his name and residential address known" to the committee receiving the contribution. In addition, M.G.L. c. 55, § 18 requires all candidates and committees to file complete and accurate campaign finance reports disclosing all contributions received, expenditures made, and liabilities incurred during the relevant reporting period.

Committee records indicate that, between December 2015 and August 2017, at least ten people affiliated with LStar, including executives and their spouses, made approximately \$22,000 in contributions to the Committee. The Committee accurately and timely reflected all of the contributions received in its relevant campaign finance reports. Based upon our review of Committee and contributor bank records, there is no evidence that individual contributors were reimbursed for the contributions they made to the Committee. Accordingly, OCPF has determined that the Committee complied with the campaign finance law, and, therefore, 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. A copy is being provided to the person(s) who brought this matter to our attention.

Sincerely,

Michael J. Sullivan  
Director

MJS/mc

