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DIRECTOR

THE COMMONWEALTH OF MASSACHUSETTS  
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March 11, 2022

Joel Saslaw  
The Committee to Elect Joel Saslaw  
21 Benevento Circle  
Peabody, MA 01960

Re: CPF-21-116

Dear Mr. Saslaw:

This office has completed its review of a complaint we received regarding your Committee's campaign finance activity in 2021. The complaint alleged that your Committee received prohibited corporate contributions, in the form of free advertising space on corporately-owned landscaping trucks. The complaint further alleged that you and your Committee failed to file campaign finance reports in 2014, 2015, or 2016.

In the spring of 2021, you commenced your reelection campaign for Ward 5 Councilor in the City of Peabody. You stated that, prior to the preliminary elections in September 2021, a friend who owns a landscaping company offered to display your campaign signs on a company truck and trailer. On September 14, 2022, the day of the municipal preliminary election, a representative from the landscaping company parked the truck and trailer in a visible location to provide advertising for your candidacy. Initially, your Committee did not pay for the use of the truck or trailer.

On September 23, 2021, immediately after being contacted by OCPF staff, you obtained an invoice from the landscaping company for the use of the truck and trailer, equal to the fair market value of what it would cost to rent a similar vehicle for the amount of time it was used to advertise your candidacy. On the same day, you made a payment to the landscaping company, in the amount of \$468.67, using a check drawn on your Committee's account. Your pre-election report was timely-filed with the City Clerk and accurately reflected the payment to Weiss Landscaping.

Section 8 of M.G.L. c. 55, the campaign finance law, states, in pertinent part: "...[N]o business or professional corporation, partnership, limited liability company partnership under the laws or doing business in the commonwealth and no officer or agent acting in behalf of any corporation mentioned in this section, shall 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 aiding, promoting or preventing the nomination or election of any person to public office, or aiding or promoting or antagonizing the interest of any political party." Your Committee's use of a corporately-owned truck and trailer as a means to display campaign signs, without compensating the corporation for that use, did not comply with the restrictions of the campaign finance law. However, upon being notified of the issue, you promptly

obtained an invoice from the corporation, paid the invoice in full, and appropriately disclosed the transaction. Therefore, because the appropriate remedial measures were promptly taken, no further action is required at this time.

The complaint further alleged that you failed to file campaign finance reports for three years, for the period 2014-2016. You indicated in conversations with OCPF staff that you believed your Committee filed the reports, but that you were not able to locate your copies. It is OCPF's understanding that several other candidates also appear to be missing reports from the same timeframe. Consequently, because we are unable to determine whether the lack of reports from the referenced period resulted from your Committee's failure to file or from some other possible clerical error, no further action is warranted at this time. You should be aware, however, that the campaign finance law requires candidates and committees to keep their records for a period of six (6) years from the date of the relevant election. M.G.L. c. 55, §§ 2, 5. In the future, you and your treasurer must take care to retain your Committee's records for at least the minimum period as set forth in the statute.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record. A copy will be provided to the City Clerk for inclusion in your public file, and a copy may be provided to the person(s) who brought this matter to our attention.

Sincerely,

A handwritten signature in blue ink that reads "William C. Campbell/ms". The signature is written in a cursive style.

William C. Campbell  
Director

WCC/mc