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November 20, 2025

Christopher Keohan
CK Strategies, LLC
c/o Aaron Barden, Esq.
Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.
1620 Eye Street NW, Suite 900
Washington, DC 20006

Re: CPF-24-52

Dear Mr. Keohan:

This office has completed its review of a complaint alleging what appeared to be a coordinated expenditure by the International Association of Fire Fighters ("IAFF") made to support the 2023 re-election campaign of Erin Murphy ("Murphy") for Boston City Council. Based on our review, and for the reasons that follow, OCPF has determined that the activity of CK Strategies, LLC ("CK Strategies") did not comply with M.G.L. Chapter 55, the campaign finance law and its related regulations.

Background

On or around September 12, 2023, the Committee to Elect Erin Murphy ("the Committee") contracted Neponset Strategies, LLP ("Neponset"), operated by Dianne Morad ("Morad") for campaign work, including the design, production and distribution of multiple campaign mailers and advertising. Morad subsequently requested that you, as principal of CK Strategies, assist Neponset by performing work on the Committee's campaign mailers. As a result of Morad's request, you directly communicated with Murphy and the Committee regarding the design and quantity of the Committee's campaign mailers to be distributed. These communications took place as early as October 8, 2023 and continued as late as October 25, 2023. The Committee paid Neponset for three different campaign mailers in support of Murphy.

On or around October 19, 2023, the IAFF contacted you and CK Strategies to retain your services relative to designing, producing and distributing a mailer that endorsed two candidates, including Murphy. The IAFF's mailer was intended to be an independent expenditure, paid for by the IAFF's general treasury fund. The IAFF filed an independent expenditure report disclosing that the value of the mailer attributable to Murphy was \$13,229.34.



OCPF received a complaint raising concerns that the mailers showed evidence of coordinated expenditures as they utilized similar fonts and layouts, as well as the same mail permit.

Coordination

An “independent expenditure” is an expenditure made as payment for goods or services to expressly advocate the election or defeat of a clearly identified candidate without cooperation or consultation with any candidate or a nonelected political committee organized on behalf of the candidate or an agent of the candidate and not made or incurred in concert with or at the request or suggestion of the candidate, a nonelected political committee organized on behalf of the candidate or agent of the candidate. See M.G.L. c. 55, § 1. Such expenditures may be made without limit, from any individual or entity, subject to accurate and timely disclosure. See M.G.L. c. 55, §18A.

There is a presumption that an expenditure funding a communication would be a coordinated communication if the person or entity making the expenditure retains the services of a common consultant who concurrently provides either the candidate or the committee with professional services related to strategy for the current campaign. Such an expenditure is considered a contribution, and not an independent expenditure, and therefore is subject to all the limits and restrictions in the campaign finance law. See 970 CMR 2.21(4).

The presumption may be rebutted by evidence demonstrating that the services were provided consistent with a previously established written firewall policy that prohibits the flow of strategic non-public information to the person or entity making the expenditure, or other evidence indicating that the common consultant actually prohibited the flow of strategic, non-public information between the entity making an independent expenditure and the candidate, candidate’s committee, or agent. See 970 CMR 2.21(6)(b), 970 CMR 2.21(3) and 970 CMR 2.21(7). A firewall policy must designate specific staff that will solely service the candidate, and specific staff that will solely service persons or entities making independent expenditures; must provide for physical and technological separations to ensure that strategic non-public information does not flow between the person or entity and the candidate or committee; and must be written, and distributed to all relevant employees, consultants, and clients affected by the policy. See 970 CMR 2.21(7)(a).

During this review, you acknowledged that CK Strategies did not have a written firewall policy, although you indicated that the firm had a verbal firewall policy. CK Strategies did not designate specific individuals to work solely for the Committee and other staff to work solely for IAFF. You confirmed that you personally performed work for the Committee and the IAFF at the same time. Further, you were included in direct communications with both the Committee and the IAFF regarding their plans for campaign mailers. You provided professional services to both the Committee and the IAFF by aiding both entities in the design of campaign mailers and helping to facilitate their distribution via direct mail.

Both Murphy and the IAFF filed affidavits with OCPF, under the pains and penalties of perjury, stating that they were unaware of your status as a common consultant, and that the Committee, Murphy and the IAFF did not directly receive any strategic, non-public information from the other. The IAFF stated that it intended to make an independent expenditure to support Murphy. However, OCPF has concluded that your simultaneous work for both entities absent proper firewalling triggered the presumption of coordination between the IAFF and the Committee and no evidence has been provided to rebut that presumption.

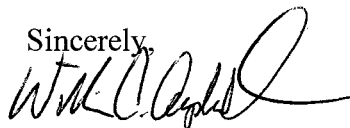
This presumption of coordination converted the independent expenditure into a contribution by the IAFF to the Committee in the amount of \$13,229.34. See 970 CMR 2.21(4). As an entity subject to 970 CMR 1.22, the IAFF was limited to a contribution of \$1,000 to the Committee in 2023. See M.G.L. c. 55, § 7A. Since this activity resulted in the IAFF making a contribution rather than the intended independent expenditure, the independent expenditure report filed by the IAFF inadvertently did not comply with the campaign finance law.

Conclusion

Based upon our review, OCPF has determined that both you and CK Strategies did not comply with the requirements of the campaign finance law as set forth above. While OCPF did not find evidence of an intentional violation in this instance, we believe the failure to comply with the requirements of the campaign finance law was due in large part to a lack of understanding of those requirements. In the interest of equity, you took responsibility for the unintended contribution. To resolve the matter, you have made a payment in the statutory amount of \$5,000 to the Commonwealth. We anticipate that the guidance provided during the course of this review will result in future compliance with the campaign finance law and, therefore, no further action is required and this matter may be closed at this time. You should be aware, however, that further instances of noncompliance with the campaign finance law may result in referral to the Attorney General in accordance with Section 3 of the campaign finance law.

In accordance with a ruling by the Supervisor of Public Records, this letter and all related correspondence is a matter of public record. A copy may be provided to the person(s) who brought this matter to our attention. If you have any questions regarding this or any other campaign finance matter do not hesitate to contact this office.

Sincerely,



William C. Campbell
Director

WCC/db

cc: Erin Murphy, Committee to Elect Erin Murphy
Tim Dupin, International Association of Fire Fighters