

# OCPF Reports



## From the Director

Mike Sullivan

The largest ethics, lobbying, FOIA, elections and campaign finance organization in North America will meet in Boston this December.

It's called the **Council on Governmental Ethics Laws** (COGEL), and if you work in the fields above, I recommend attending its annual conference (details are [available here](#)).

The conference offers more than 40 sessions that cover the latest information concerning COGEL's disciplines. [Click here](#) to see the full schedule.

Speakers include Norman Eisen, former special counsel to President Obama on issues of ethics and government reform, and Jeff Gottlieb, Pulitzer Prize-winning journalist, formerly of the Los Angeles Times.

The origins for a COGEL-like conference date back 1974, when a group of representatives from more than 40 newly-formed federal and state ethics agencies met at the Watergate Hotel in D.C. As president of the organization, I'm proud that we're still meeting four decades later.

Please join us at the Fairmont Copley Plaza Hotel Dec. 6 to 9, or call me at 617-979-8300 if you have questions about attending. The conference is co-hosted by OCPF and the State Ethics Commission.

# All municipal filers can now use R6



Municipal candidates who file paper campaign finance reports with their local election officials can now **create and print** cam-

paign finance reports using Reporter 6 (R6), the same web-based system used by candidates and committees who file with OCPF.

R6 has many benefits for local filers.

The filing system does the math, alphabetizes receipts and expenditures, and stores a campaign's data. It also creates a report that is easy to read.

More than 1,200 candidates are registered with OCPF and e-file campaign finance reports with the agency. Meanwhile, thousands of local incumbents and candidates in the state's 351 cities and towns file on paper with their local election officials.

"When we launched R6 in April, we planned

on opening it up to local filers," said Mike Sullivan, OCPF's director. "I'm pleased we can now make it available to local candidates."

To register, a local candidate must send his or her organizational form ([M101](#)) to OCPF, with "R6 setup only" written at the top. [Click here](#) for a sample.

If a candidate does not have a committee or a completed M101 form, he or she can complete the form and send it, unsigned, to OCPF.

After registering, each candidate is issued a password and identification number, sent to them by e-mail. If the M101 form is sent to OCPF by traditional mail or by fax (617-727-6549), an e-mail address must be included.

[Click here](#) to watch a short tutorial on how to create, print and file reports using R6.

### How to Register for R6 Access: Local Paper Filers

1. Fax/E-Mail/Mail a copy of your [M101](#) organizational form to OCPF (candidates without the M101 should complete & send the form, but mark the top "R6 setup only" and do not sign it).
2. Receive an ID number and password from OCPF by e-mail. It is important that an e-mail address be provided to OCPF

#### Fax

617-727-6549

#### E-Mail

[ocpf@cpf.state.ma.us](mailto:ocpf@cpf.state.ma.us)

#### Address

One Ashburton Place  
Room 411  
Boston, MA 02108

# House and Senate candidates file mid-year reports

Legislative candidates reported \$3,962,749 in receipts and \$2,768,654 in expenditures during the first six months of 2015, according to mid-year campaign finance reports e-filed with OCPF.

Of the 472 candidates who filed mid-year reports, 226 reported raising no money during the six-month reporting period.

**Mid-Year Reports**

Mid-year reports have been re-

quired since 2011, but only during non-election years. The reports cover activity from Jan. 1 to June 30, due by July 20.

All legislative incumbents, and anyone else organized with OCPF for a legislative seat, must file mid-year reports. No other political committee files mid-year reports.

[Click here](#) for the complete list of mid-year filings.

The next reports filed by legislative candidates will be the year-end report due by Jan. 20, covering activity from July 1 to Dec. 31.



THE COGEL CONFERENCE WILL BE HELD IN  
BOSTON THIS DECEMBER

THE COUNCIL ON GOVERNMENTAL ETHICS LAWS (COGEL) IS THE PREEMINENT ORGANIZATION OF GOVERNMENT ETHICS ADMINISTRATORS

[CLICK HERE](#) FOR INFORMATION ABOUT ATTENDING THE CONFERENCE DEC. 6 TO 9 AT THE FAIRMONT COPLEY PLAZA HOTEL

[CLICK HERE](#) TO WATCH THE COGEL 2015 WELCOME VIDEO

# Recent Cases & Rulings

*OCPF audits all campaign finance reports and reviews all complaints alleging violations of the campaign finance law. These audits and reviews may result in enforcement actions or rulings (below). OCPF does not comment on any matter under review, nor does the office confirm or deny that it has received a specific complaint. The identity of any complainant is kept confidential. PRLs and disposition agreements are matters of public record once cases are concluded.*

## Public Resolution Letters

A **public resolution letter** may be issued in instances where the office found “no reason to believe” a violation occurred; where “no further action” or investigation is warranted; or where a subject “did not comply” with the law but, in OCPF’s view, the case is able to be settled in an informal fashion with an educational letter or a requirement that some corrective action be taken. A public resolution letter does not necessarily imply a wrongdoing on the part of a subject and does not require agreement by a subject.

### **CPF-15-48: Plumbers Union Local #12 PAC, Boston.**

Did not comply (disclosure); 6/18/2015. Between Jan. 1, 2013, and Jan. 31, 2015, the PAC did not disclose \$22,428 in expenditures, of which \$8,250 were contributions made to Massachusetts political committees. The PAC also disclosed \$6,000 in contributions to candidates that were never cashed. To resolve the matter, the PAC amended its campaign finance reports and made a payment of \$5,000 to the state’s general fund.

### **CPF-15-55: Local 509 SEIU COPE MA Workers PAC, Watertown.**

Did not comply (disclosure); 7/13/2015. The PAC did not disclose two deposits in 2014 that totaled \$15,000, and did not report \$550 in expenditures. Additionally, the PAC disclosed approximately \$3,500 in expenditures that were not cashed by the recipients and the PAC did not amend its reports to show that the checks had not cleared. To resolve the matter, the PAC made a payment of \$1,000 to the state’s general fund.

### **CPF-15-58: Frank Laflamme, Chicopee.**

No reason to believe (disclosure); 7/30/2015. OCPF received a complaint concerning \$8,260 in unitemized receipts disclosed by the committee in 2013. The campaign finance law requires committees to keep records of all contributions, including contributions of \$50 or less. The committee maintained a list of the names and addresses of all persons attending the

fundraising event. OCPF determined there is no reason to believe that the committee violated the campaign finance law.

**CPF-15-59: Mike Watson, Mendon.** Did not comply (disclosure); 8/12/2015. Watson received money from individuals for signs to oppose a June 30, 2015 ballot question but did not organize a ballot question committee. If two or more people pool resources to support or oppose a ballot question, a ballot question committee must be formed. Watson organized a ballot question committee and filed a report after this letter was issued.

**CPF-15-64: Randy Azzato, East Falmouth.** Did not comply (public employee); 9/4/2015. Azzato, an employee of the Massachusetts Department of Correction, attended a July 23, 2015 event supporting his campaign for Barnstable County Sheriff. During the event, he asked those present for financial support for his campaign. In addition, posts made to the Azzato Committee’s Facebook page concerning fundraising appeared to come from the candidate. Public employees are prohibited from soliciting contributions for any political purpose, directly or indirectly. To resolve the issues, Azzato made a \$200 payment to the state’s general fund and removed social media posts that suggested personal solicitations of contributions.

## Contact OCPF’s Legal Team

**OCPF’s lawyers are available to answer questions concerning the campaign finance law.**

**Our attorneys, Gregory Birne, Sarah Harttry and Maura Cronin, are available at 617-979-8300.**

# Worcester law firm owners pay \$10,000 to resolve issues concerning prohibited contributions

The co-owners of a Worcester law firm agreed to pay \$8,000 to the state's general fund as part of a disposition agreement concerning prohibited contributions to a statewide candidate, according to the Office of Campaign and Political Finance. Each owner also agreed to make a \$1,000 donation to charity.

Law firm owners Louis Aloise and Michael Wilcox gave three employees \$1,000 each to reimburse them for contributions the employees would make, at the request of the owners, to the Kar-yn Polito Committee in April, 2014, according to the Sept. 30 [disposition agreement](#) between OCPF and the owners.

Aloise and Wilcox agreed to ask colleagues and friends to attend an April, 2014, fundraiser at a Worcester restaurant to benefit Polito's campaign.

Shortly before the event, Aloise and Wilcox realized that none of the individuals they had asked to attend the fundraiser would be able to attend. To ensure a reasonable turnout at the event, Aloise and Wilcox asked three employees and their spouses to attend the event.

Each of the three employees and their spouses made individual \$500 contributions to the Polito Committee on April 23 with

money that was provided to them by Aloise and Wilcox.

The owners of the law firm and their spouses also contributed \$500 each, using their personal funds.

The campaign finance law prohibits an individual from making a contribution by disguising the true origin of the funds. The law also capped individual contributions to \$500 per calendar year in 2014 (starting Jan. 1, 2015, the limit increased to \$1,000).

Aloise and Wilcox cooperated with OCPF's review, according to the agreement.

The Polito Committee had no knowledge that the contributions were made with prohibited funds, according to the disposition agreement. The committee has disgorged \$3,000, the total amount contributed by the law firm employees and their spouses.

The agreement was signed by Aloise and Wilcox, and OCPF Director Michael J. Sullivan.

A disposition agreement is a voluntary written agreement entered into between the subject of a review and OCPF, in which the subject agrees to take certain specific actions.

## **Did you know?**

**Committee** debit cards can be used to make expenditures for goods or services, but cannot be used to withdrawal cash from ATMs



## **How to Contact OCPF's Technology Team**

### **Chief Information Officer**

**Albert Grimes:** [agrim@cpf.state.ma.us](mailto:agrim@cpf.state.ma.us)

### **Business Systems Analyst**


**Tracey Dano:**  
[tdano@cpf.state.ma.us](mailto:tdano@cpf.state.ma.us)

### **IT Support Engineer**

**Sam Tsoi:**  
[stsoi@cpf.state.ma.us](mailto:stsoi@cpf.state.ma.us)



# OCPF's on-line tutorials are displayed on one page



The screenshot shows the OCPF Home Page. At the top, it says "Welcome to the OCPF Home Page" and "The Massachusetts Office of Campaign & Political Finance". Below this are navigation links: "E-file a report", "Browse registered filers & reports", "Search Campaign Finance Data", "Contribution Limits", and "Treasurer Training". A secondary navigation bar includes "News", "E-File", "View Reports", "Data", "Filers", and "Help Videos". A large yellow arrow points from the "Filers" link to the "Help Videos" link. Below the navigation bar, there are sections for "Popular Training Videos" (listing links for organizing committees, e-filing reports, and expenditures), "OCPF Reports" (with a YouTube channel link and a subscribe button), and "Additional Help & Information" (with links to reporting systems and candidate types). The footer contains the OCPF logo, a message from the director, a link to Visit Mass.Gov, technical page, contact us, and social media icons for YouTube and Twitter.

OCPF has created more than 30 tutorial videos this year due to the debut of the agency's new e-filing system, Reporter 6 (R6), and sweeping changes to the campaign finance law that went into effect in January.

The videos provide step-by-step instructions on how to access and use R6 to e-file or print reports.

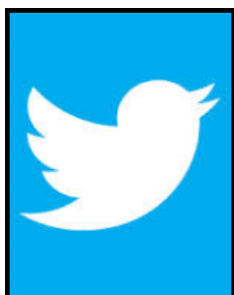
The videos are divided into three main categories — depository candidates and committees, non-depository candidates and committees, and general tutorials.

All depository candidates and committees e-file with OCPF and designate a bank to file reports on their behalf. **Non-depository** candidates include legislative candidates, mayoral candidates in cities with populations of less than 75,000, and all municipal candidates who are not in the depository system and who file paper reports locally. Local party committees and ballot question committees are also in the non-depository system.

**Depository** committees include statewide and county candidates, Governor's Council candidates, PACs and mayoral and city council candidates in cities with populations of 75,000 or more. State party committees are also in the depository system.

To access on-line tutorials, click "[Help Videos](#)" on the OCPF home page:  
[www.ocpf.us](http://www.ocpf.us)

@OCPFreports



*Announcements*

*News*

*Reporting Tips*

## How to Contact OCPF's Auditors

Tricia Jacobson	<a href="mailto:pjacobson@cpf.state.ma.us">pjacobson@cpf.state.ma.us</a>
Shane Slater	<a href="mailto:sslater@cpf.state.ma.us">sslater@cpf.state.ma.us</a>
Jeff Tancreti	<a href="mailto:jtancreti@cpf.state.ma.us">jtancreti@cpf.state.ma.us</a>
Leslie Dano	<a href="mailto:ldano@cpf.state.ma.us">ldano@cpf.state.ma.us</a>
Anne Bourque	<a href="mailto:abourque@cpf.state.ma.us">abourque@cpf.state.ma.us</a>



# Mayoral Filing Dates in Cities with Populations of 75,000 or Less

In cities that had no mayoral preliminary election, the reporting period is Jan. 1 to Oct. 16, and the report is due Oct. 26. Cities in this category are **Agawam, Amesbury, Attleboro, Beverly, Braintree, Chicopee, Gardner, Greenfield, Haverhill, Leominster, Malden, Medford, Melrose, Methuen, Peabody, Taunton, Waltham, Westfield and Woburn.**

## *Pre-election reporting schedule for cities that had mayoral preliminary elections:*

**Fitchburg:** Pre-election reporting period is Sept. 5 to Oct. 16, due Oct. 26

**Gloucester:** Pre-election reporting period is Sept. 12 to Oct. 16, due Oct. 26

**Holyoke:** Pre-election reporting period is Sept. 5 to Oct. 16, due Oct. 26

**Marlborough:** Pre-election reporting period is Sept. 19 to Oct. 16, due Oct. 26

**North Adams:** Pre-election reporting period is Sept. 5 to Oct. 16, due Oct. 26

**Pittsfield:** Pre-election reporting period is Sept. 5 to Oct. 16, due Oct. 26

**Revere:** Pre-election reporting period is Aug. 15 to Oct. 16, due Oct. 26

**West Springfield:** Pre-election reporting period is Aug. 22 to Oct. 16, due Oct. 26

**Weymouth:** Pre-election reporting period is Aug. 31 to Oct. 16, due Oct. 26

*Note: Mayoral candidates in cities with populations of more than 75,000 are in the depository system of reporting and are not subject to the schedule above. Instead, these candidates file campaign finance reports twice monthly.*

## OCPF issues new memo to explain joint fundraising issues

OCPF issued a new memo to explain the requirements for joint fundraising and joint campaign activities, and to answer frequently asked questions about those issues.

In general, when two or more candidate committees hold a joint fundraising event, the costs for holding such an event should be evenly shared by each committee, and each committee should make payments directly to the vendors, according to the memo.

The memo also addresses when party committees raise funds with candidate committees. For these events, contributors

must give their contributions directly to each sponsoring committee. Party committees may make in-kind contri-

butions to candidate committees without limit.

Each committee must maintain records regarding the event and disclose all contributions received and expenditures

made.

The new memo is available by [clicking here](#).

**WHEN CAMPAIGNS  
UNITE**

# Late Contribution Reports

## Mayoral Candidates

The campaign finance law requires mayoral candidates\* to e-file late contribution reports within 72 hours of receiving & depositing a single contribution of \$500 or more after the 18th day before an election, but not within three days of the election.

The general election late contribution reporting period for all mayoral candidates is:

***Oct. 17 to Oct. 30***

- *\*Mayoral, city council and alderman candidates in the depository system, in cities with populations of more than 75,000, are not required to file late contribution reports if they file a regular deposit report within three days of making a deposit during the late contribution reporting period above*
- *An instructional video on how to file late contribution reports using Reporter 6 is available at OCPF's YouTube channel by [clicking here](#)*
- *OCPF's late contribution report guide is available by [clicking here](#)*

