



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

ONE ASHBURTON PLACE, ROOM 411  
BOSTON, MASSACHUSETTS 02108

TEL : (617) 979 - 8300  
(800) 462 - OCPF  
EMAIL : OCPF@CPF.STATE.MA.US

November 6, 2020

Francis G. Sullivan  
394 Parker Road  
Lancaster, MA 01523

Re: CPF 20-87

Dear Mr. Sullivan:

This office has completed its review of a complaint we received regarding your campaign for Planning Board in an election held on June 29, 2020, in Lancaster. Specifically, the complaint alleged that you failed to disclose your financial activity, including the use of a van that displayed campaign signs for one month prior to the election.

The 8<sup>th</sup> Day Pre-Election Report, covering activity through June 11, 2020, was due at the Lancaster Town Clerk's office by June 21, 2020. You filed a Form CPF M 102-0: Campaign Finance Report Municipal Form on June 24, 2020, three days late. However, this report indicated that there was no activity. The 102-0 Form is used by candidates certifying that no contributions were received and no expenditures were made during the reporting period.

The 30<sup>th</sup> Day Post-Election Report was due by July 29, 2020, covering activity between June 12, 2020 and July 19, 2020. This report was not filed until you were contacted by OCPF. You stated that it was your understanding, based on correspondence from the Town Clerk, that this report was not required until the end of the year. Once you were made aware of the filing requirement, you promptly filed the 30<sup>th</sup> Day Post-Election Report to accurately disclose your activity. The report shows \$2,550 in contributions received, \$1,684 in expenditures, and \$1,491 in liabilities.

Additionally, you acknowledged to OCPF that you were aware of the van with campaign signage, however, you affirmed that you had no knowledge of who was responsible for it.<sup>1</sup>

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<sup>1</sup> On October 13, 2020, an Independent Expenditure Report (Form CPF M 18A) was filed with the Lancaster Town Clerk by Richard O'Brien - Gator Auto Parts, Inc., disclosing the cost of the van and campaign signs to support Francis Sullivan. The van was used from June 1, 2020 through the date of the election. Accordingly, this report should have been filed prior to the election, by June 10, 2020. See M.G.L. c. 55, § 18A. Please see OCPF's public

M.G.L. c. 55, § 18 requires all candidates to file timely campaign finance reports that accurately reflect all campaign finance activity in the relevant reporting period(s), including all contributions received, expenditures made, and liabilities incurred.

After being contacted by OCPF, you fully cooperated with our review and promptly filed the required post-election report with the Lancaster Town Clerk to accurately disclose your financial activity. The initial nondisclosure was apparently the result of a misunderstanding regarding the requirements of the campaign finance law. Therefore, because OCPF believes that the guidance provided during the course of this review will ensure future compliance, we have determined that 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. A copy is being provided to the person(s) who brought this matter to our attention. 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/me". The signature is written in dark ink and is positioned above the printed name and title.

Michael J. Sullivan  
Director Pro Tem

cc: Dianne Reardon, Lancaster Town Clerk

MJS/mj