



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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November 6, 2020

Stanley B. Starr, Jr.  
34 Squire Shaler Lane  
Lancaster, MA 01523

Re: CPF 20-87

Dear Mr. Starr:

This office has completed its review of a complaint we received regarding your campaign for Selectman 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 this report on June 15, 2020, but the report was filed with errors. The summary balance information section was incomplete and the report listed two expenditures without purpose information under Schedule A, Receipts.

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. You filed a Form CPF M 102-0: Campaign Finance Report Municipal Form on July 30, 2020, one day late. However, the disclosure report filed 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.

You stated that you self-funded the campaign and only made two expenditures prior to the election. Once contacted by OCPF, you promptly filed an amended 8<sup>th</sup> Day Pre-Election Report to accurately disclose your activity. The report now correctly shows the expenditures, totaling \$520 that were paid for by the candidate.

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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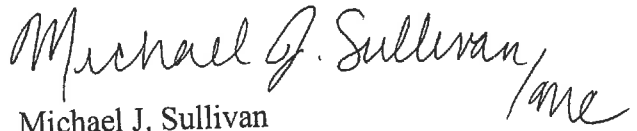
<sup>1</sup> On October 13, 2020, an Independent Expenditure Report (Form CPF M 18A) was filed with the Lancaster Town Clerk by Richard O'Brien - Gator Auto Parts, Inc., disclosing the cost of the van and campaign signs to support Stanley Starr. The van was used from June 1, 2020 through the date of 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 resolution letter to Richard O'Brien - Gator Auto Parts, Inc., dated November 6, 2020. A copy of this letter is enclosed.

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. This includes any out-of-pocket expenditures made by candidates on behalf of their own campaigns. In those circumstances, candidates who file on paper with their local election officials should reflect their out-of-pocket expenditures as both a contribution from themselves to their campaign on Schedule A of the campaign finance report, and an expenditure to the vendor on Schedule B.

After being contacted by OCPF, you fully cooperated with our review and promptly filed an amended campaign finance report with the Lancaster Town Clerk to accurately disclose your out-of-pocket expenditures. The inaccurate disclosure, as initially filed, was apparently the result of a lack of knowledge 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,

  
Michael J. Sullivan  
Director Pro Tem

cc: Dianne Reardon, Lancaster Town Clerk

MJS/mj