



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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May 27, 2009

Councilor Alan Kazanjian
Kazanjian Committee
129 Westview Road
Lowell, MA 01851

Re: CPF-09-20

Dear Councilor Kazanjian:

This office has completed its review of financial activity undertaken by the Kazanjian Committee during 2007. This review was initiated at the request of the Committee when the current Treasurer determined that campaign finance disclosure reports did not accurately represent previous committee activity. The Committee provided all requested documentation to facilitate the review and fully cooperated with OCPF.

Specifically, the Committee's primary issues were the duplicate disclosure of over 25 contributions, the non-disclosure of 2 contributions, and the inaccurate disclosure of receipts of \$50 or less. The Committee also accepted one money order in excess of \$50.

We have concluded that the receipt of an excess cash equivalent contribution and the inaccurate disclosure and non-disclosure of contributions did not comply with Sections 9 and 18 of M.G.L. c. 55, the campaign finance law. Section 9 prohibits the receipt of contributions via money order in excess of \$50.00 and section 18 requires the accurate disclosure of all contributions received.

Based on the findings in this review, the Committee has filed a supplemental deposit report for 2007, amended two other 2007 deposit reports and has filed an amended 2007 year-end campaign finance report. These corrected reports now accurately and completely disclose all of the Committee's financial activity.

While OCPF has determined that the Committee maintained adequate records and that the errors made by the Committee were inadvertent in nature, the Committee, as well as OCPF, has indicated its concern that all subsequent reports provide accurate and complete disclosure. To ensure such disclosure, the Committee has agreed to provide OCPF with copies of all contributor checks received and deposited by the Committee in accordance with the following schedule:

Time Period	Due Date
6/1/2009 to 8/31/2009	9/30/2009



Time Period	Due Date
9/1/2009 to 12/31/2009	1/31/2010
1/1/2010 to 6/30/2010	7/31/2010
7/1/2010 to 12/31/2010	1/31/2011

The Kazanjian Committee will also provide any further documents requested by OCPF within 10 business days.

To resolve the money order issue discussed above, the Committee will refund \$150 to the contributor and will provide OCPF with a copy of the cancelled refund check as proof of the refund. The Kazanjian Committee has also made a \$250 payment to the Commonwealth for costs incurred during OCPF's review.

In accordance with the opinion of the Supervisor of Public Records this letter is a public record. 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

MJS/td