



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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July 27, 2009

Paul P. Broutas, Jr., Treasurer  
Patrick Committee  
55 Court Street, Suite 310  
Boston, MA 02108

Re: United Food and Commercial Workers (UFCW);  
CPF-09-07

Dear Mr. Broutas:

During the course of an OCPF-initiated review of contributions made by the United Food and Commercial Workers Active Ballot Club Massachusetts Political Action Committee (the PAC) for 2006 to 2008, OCPF learned that the PAC disclosed the making of contributions to several political committees. In fact, the contributions were actually made by UFCW's federal PAC. Among the contributions made by the federal PAC was a contribution in the amount of \$5,000 made to the Patrick Victory Fund<sup>1</sup> on May 31, 2006.

The campaign finance law states that Massachusetts candidates and political committees other than ballot question committees may not receive funds from any federal political committee. *See* M.G.L. c. 55, § 7 and OCPF Interpretive Bulletin IB-82-01.

The contribution was reported by the Committee as having been received from UFCW Local 328 PAC, not from UFCW's federal PAC. When the contribution from the federal PAC was received by the Patrick Victory Fund, neither the joint fundraising agent nor the Committee were notified by UFCW that the funds were actually from the UFCW federal PAC, and the Committee had no reason to believe that the contribution was from a prohibited source. The check from the federal PAC to the Patrick Victory Fund did not identify the source of the funds as the federal PAC, stating instead that the check was from the "Active Ballot Club General Fund."

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<sup>1</sup> The Patrick Victory Fund was a joint fundraising agent for the Patrick Committee and the Democratic State Committee. Of the \$5,000 contributed to the Fund, \$4,500 was attributed to the Democratic State Committee and \$500 was attributed to the Patrick Committee.



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To resolve this matter, UFCW has paid the Commonwealth \$3,500 and has agreed to dissolve its state PAC. In addition, the UFCW federal PAC will make no further contributions to the Committee. A copy of the Agreement between UFCW and OCPF resolving this matter is enclosed, for information.

Due to the remedial actions taken by UFCW, this office has determined that this matter may be closed at this time. We expect that the review and guidance provided by this office will result in compliance with the campaign finance law in the future.

In accordance with this office's procedures and an opinion issued by 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,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a large, sweeping "M" and "S".

Michael J. Sullivan  
Director

Enclosure  
MJS/gb