



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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February 6, 2009

CPF ID# 80823
Paul Larkham, Treasurer
New England Police Benevolent Association Inc. PAC
227 Chelmsford Street, The Zeus Building
Chelmsford, MA 01824

Re: CPF-09-08

Dear Mr. Larkham:

This office has completed our review of the campaign finance activity of the New England Police Benevolent Association Inc. PAC (the "PAC") for calendar year 2008. As you know, this review was initiated by a routine analysis of the PAC's 2008 year-end report, which indicated that the PAC had received and spent funds prior to filing a statement of organization with this office. The committee fully cooperated with our review.

Based on our review, we have concluded that the PAC did not comply with certain organizational and disclosure requirements of the campaign finance law, M.G.L. c. 55. However, because of your cooperation and the remedial actions described below, we have concluded that this matter may be closed at this time. We believe that the guidance provided in the course of this review will ensure future compliance with the campaign finance law.

The campaign finance law requires all political committees to file a statement of organization before receiving or spending any funds and thereafter to file timely campaign finance reports that disclose completely and accurately a committee's campaign finance activity. See M.G.L. c. 55, ss. 5 and 18.

The PAC is aware that it did not file a statement of organization as required when it first began to raise and spend funds for political purposes in January 2008. After the previous treasurer unexpectedly passed away, you took over as treasurer of the PAC. Shortly thereafter, you conducted a review of the committee's records and realized the requirement to register as a PAC with this office had not been completed. Subsequently, you filed a statement of organization with OCPF on November 10, 2008.



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The committee also did not file timely the pre-primary and pre-election reports in 2008. However, on the same day of being contacted by this office you filed the appropriate reports which disclosed substantial activity from the start date of January 24, 2008 through November 5, 2008.

To resolve this matter, the Committee has made a \$250 payment from committee funds to the Commonwealth of Massachusetts.

In accordance with the opinion of the Supervisor of Public Records and this office's procedures, this letter is a public record. Please do not hesitate to contact this office in the future should you have any questions regarding the campaign finance law.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Sullivan". The signature is written in dark ink and is positioned above the printed name and title.

Michael J. Sullivan
Director