



The Commonwealth of Massachusetts

Office of
Campaign & Political Finance

One Ashburton Place, Boston 02108

727-8352

February 3, 1988

AO-88-02

Dennis J. Duffin
Director

W. Michael Ryan
District Attorney
Northwestern District
Box 268
Hatfield, MA 01038

Dear Mr. Ryan:

This letter is in response to your recent request for an advisory opinion concerning the application of M.G.L. c. 55 to a fundraiser to be held jointly by your political committee and the political committee organized on behalf of Patrick M. Goggins.

Massachusetts campaign finance law prohibits a political committee organized on behalf of one candidate from contributing more than \$100 to a political committee organized on behalf of another candidate. M.G.L. c. 55, §6.

A fundraiser held jointly by two political committees would, of necessity, require shared expenses. At a minimum, expenses for renting the banquet hall and providing food and drink would be shared. It is conceivable solicitations/invitations would also be jointly prepared and mailed.

Because of the joint nature of this activity, identifiable individual action by each of the political committees would be difficult to ascertain, even with the most careful accounting. There can be no assurance that one committee would not benefit from the other committee in an amount exceeding the \$100 permitted by M.G.L. c. 55, §6.

A joint fundraiser as you have proposed would therefore not be permitted under M.G.L. c. 55. The political committees, of course, could sponsor individual fundraisers, each for its own benefit, paying all expenses.

Should you have additional questions please do not hesitate to call this office.

Very truly yours,

Dennis J. Duffin
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Director

DJD/ba