

**EFFICIENT RESULTS**

May 30, 2018

Andrew Upton  
617-279-2595  
Andrew.Upton@dsu-

BY E-MAIL & FIRST CLASS MAIL

Jason Tait  
Records Access Officer  
Office of Campaign and Political Finance  
One Ashburton Place, Room 411  
Boston, MA 02108

Dear Mr. Tait,

I write to request public records, as that term is defined in G.L. c. 4, §7, clause 26, from the Office of Campaign and Political Finance (“OCPF”). At the outset, I note that this request is intended to be straightforward to best facilitate a prompt production of records. If you have questions, they are welcome.

The sought after public records are:

1. Any solicitations, whether in final or draft form, submitted to OCPF for its review by the Massachusetts Fiscal Alliance, Inc., or any person or entity affiliated with or representing it (collectively, “Mass Fiscal”), on or after February 23, 2016. In correspondence dated August 3, 2016, OCPF recommended that Mass Fiscal “request OCPF’s review of all solicitations for funds, regardless of the recipient . . . [to] ensure future compliance with the campaign finance law.” *See* OCPF Public Resolution Letter 16–20 (Aug. 3, 2016), enclosed. As of the date of that letter, Mass Fiscal had begun to follow OCPF’s recommendation and indicated that it would continue to do so. This request should be construed to include, without limitation, each and every solicitation submitted by Mass Fiscal to OCPF for its review consistent with that recommendation.
2. Any document wherein Mass Fiscal describes or references its activities, mission, or focus. To illustrate, in the above-cited public resolution letter, OCPF described Mass Fiscal as having represented that it “focuse[s] its efforts on voter education through the use of candidate scorecards, questionnaires, mailings, door hangers, and other media.” This request encompasses, without limitation, the document in which that representation was made and any other documents like it.

This request should be considered continuing, so as to include any public records created or received from the date of this request until the time of OCPF’s response.

I look forward to OCPF’s response within the 10-day period set forth in G.L. c. 66, § 10. Should OCPF contend that any records responsive to this request are not subject to production for any

reason, please specifically identify those records and set forth an explanation as to why OCPF has chosen not to produce them. Any such explanation should be comprehensive, such that it may be evaluated by the Supervisor of Records, and should be transmitted contemporaneously with the production of responsive documents.

In addition, I request that OCPF waive any fee that may otherwise be associated with this request pursuant to G.L. c. 66, § 10(d)(v), as the public records are sought to contribute significantly to the public understanding of the operations or activities of government. And, in any event, the request should not require more than four hours of response time. See id., § 10(d)(ii).

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

**DINICOLA, SELIGSON & UPTON LLP**

Andrew Upton