



Commonwealth
of Massachusetts

OCPF Online

www.state.ma.us/ocpf

Office of Campaign and Political Finance

One Ashburton Place, Room 411

Boston, MA 02108

Advisory Opinion

May 30, 2001

AO-01-11

Theodore P.S. LeClair
444 Washington Street
Brighton, MA 02135

Re: Expenditures for Travel Expenses

Dear Mr. LeClair:

This letter is in response to your May 24, 2001 request for guidance as to whether the Galvin 2002 Committee (“the Committee”) may use campaign funds to pay travel expenses for Committee agents to attend the state Democratic convention.

QUESTION

Can the Committee, which was organized on behalf of a statewide candidate, use campaign funds to rent a bus to transport Committee agents to the state party convention in order to hold signs and greet people on behalf of Secretary Galvin?

RESPONSE

Yes. Such an expenditure would be consistent with the campaign finance law and its relevant regulations so long as none of the agents of the Committee are otherwise delegates to the convention. See 970 CMR 2.05(4)(b)(5) (prohibiting a statewide candidate’s committee from reimbursing delegates, other than the candidate, for travel expenses associated with a state or federal party convention).

The Massachusetts campaign finance law states that a political committee organized on behalf of a statewide candidate, such as yours, may “receive, pay and expend money or other things of value for reasonable and necessary expenses directly related to the campaign of such candidate but shall not make any expenditure that is primarily for the candidate’s or any other person’s personal use.” See M.G.L. c. 55, § 6.

Regulations have been promulgated according to this standard to allow a committee to make certain expenditures for the travel expenses of its agents. Pursuant to 970 CMR 2.05(2)(j), a committee may reimburse an agent for reasonable traveling expenses within the state as long it is “relative to a political activity or function, the direct purpose of which is to solicit votes or contributions.”

In addition, 970 CMR 2.05(2)(l) provides for the reimbursement of reasonable travel expenses to agents in connection with conventions, provided that the issues which ... [the] convention is concerned are within the scope of that person’s direct and substantial responsibilities as ... [an] agent of the committee, and whose subject matter is related to at least one of the following: 1. party politics; 2. campaigning for votes; 3. fundraising; [or] 4. substantive issues which are directly related to the campaign for the candidate.”

I understand from your letter that the Committee wishes to send a group of individuals to the state party convention to hold signs and greet people on behalf of Secretary Galvin. It is the opinion of this office that the travel arrangements you have proposed to allow these individuals to attend the convention are reasonable and are permitted by M.G.L. c. 55 and the above regulations. See AO-88-20. The Committee may therefore rent a bus in order to transport its agents to the state party convention.

Please note that this opinion is issued on the basis of your letter and solely within the context of the campaign finance law. I encourage you to contact us in the future if you have further questions regarding any aspect of the campaign finance law.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Sullivan". The signature is written in black ink and is positioned to the left of a vertical line that extends downwards from the end of the signature.

Michael J. Sullivan
Director

MJS:bp