



MASSACHUSETTS REPUBLICAN PARTY RECEIVED
FEDERAL ELECTION
COMMISSION

2009 OCT 21 AM 11:49

OFFICE OF GENERAL
COUNSEL

JENNIFER A. NASSOUR
CHAIRMAN

October 19, 2009

Ms. Thomasenia Duncan
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Ms. Duncan:

I write to provide additional information regarding MUR 6216, a complaint filed by me against Massachusetts Attorney General Martha Coakley for a potential violation of Federal Election Law. On October 6, 2009, the Massachusetts Republican Party filed a complaint with the Federal Election Commission.

My full name and business address are as follows:

Nicholas L. Connors
Massachusetts Republican Party
85 Merrimac Street, Suite 400
Boston, MA 02114-4725

On October 17, 2009, the *Boston Herald* published a newspaper article entitled "\$30G in funds paid to Attorney General Martha Coakley's consultants eyed." The story details how Attorney General Coakley "paid more than \$30,000 out of her federal war chest to the same consultants she has claimed were hired to work on her 2010 state AG race."

The *Boston Herald* article continues to cite: "Washington, D.C.-based fund-raisers 4C Partners, which had never before been paid to work on a Massachusetts state race, was paid \$13,500 out of Coakley's state account in August as she ramped up her bid for Kennedy's seat. Last month, the firm was paid \$10,000 by Coakley's federal campaign, records show."

I formally request that the Federal Election Commission consider this additional information relevant to MUR 6216 and investigate whether Attorney General Coakley violated Federal Election Law, and used her state campaign account to pay for exploratory U.S. Senate campaign expenses, as federal law and regulations (see 11 CFR

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100.24 and 11 CFR 106.7) govern the expenditures in question cited above, preempt state law, and trigger the requirement that a federal account be used. If Attorney General Coakley did violate Federal Election Law, I urge you to consider taking appropriate action.

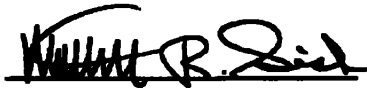
I have attached the *Boston Herald* article.

Sincerely,



Nicholas L. Connors
Executive Director
Massachusetts Republican Party

On this 19th day of October, 2009, before me, the undersigned notary public, personally appeared Nicholas L. Connors, proved to me through satisfactory evidence of identification, which were personal knowledge, to be the person whose name is signed on the preceding or attached document, and who swore and subscribed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.



Matthew R. Sisk

Common Expenses: 2/18/16

Notary Public

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COMMISSION

Boston Herald

\$30G in funds paid to Attorney General Martha Coakley's consultants 2009 OCT 21 AM 11:49

By Dave Wedge

Saturday, October 17, 2009

OFFICE OF GENERAL
COUNSEL

Criticism that Attorney General Martha Coakley ran a shadow campaign for U.S. Senate long before Sen. Edward M. Kennedy died continues to dog her as records show she paid more than \$30,000 out of her federal war chest to the same consultants she has claimed were hired to work on her 2010 state AG race.

Washington, D.C.-based fund-raisers 4C Partners, which had never before been paid to work on a Massachusetts state race, was paid \$13,500 out of Coakley's state account in August as she ramped up her bid for Kennedy's seat. Last month, the firm was paid \$10,000 by Coakley's federal campaign, records show.

Election laws prohibit candidates from using state money on federal races.

"Martha Coakley has made so many contradictory claims about her skirting of the campaign finance law that it's hard to keep it all straight," said Felix Browne, spokesman for Republican state Sen. Scott P. Brown of Wrentham, who's also running for Kennedy's seat. "At a minimum, she violated the spirit of the law and at worst she is in outright contempt of it."

Alison Mills, spokeswoman for Coakley's Democratic opponent U.S. Rep. Michael Capuano, added: "If it is determined that the chief law enforcement officer of the commonwealth did in fact violate campaign finance laws, then there should be accountability. The attorney general has the duty to live by both the spirit and intent of the campaign finance laws. Otherwise it undermines a basic belief in the system."

Coakley, who launched her Senate campaign Web site just days after Kennedy's death, has denied any improprieties. She did, however, pay \$35,000 from her state account to the federal campaign to cover assets transferred between the two operations.

"It should come as no surprise that Martha is using the same consultants for her Senate race as she was for her AG's race," Coakley spokeswoman Alex Zaroulis said. "As is public knowledge and per state and federal law, the Coakley federal committee purchased any state assets the federal committee is now using."

Also shifting from Coakley's state campaign to the federal operation last month:

Democratic operative Gus Bickford, who was paid \$6,666 for "data consulting."

Liberty Square Group, which was paid \$7,500 for consulting/fund-raising.

Lake Research Group, which was paid \$2,000 for a survey.

The firms were key to helping Coakley raise a staggering \$2.1 million in September.

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