

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CASE NO. 1:18-CV-12119-RWZ

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| MASSACHUSETTS FISCAL ALLIANCE, |) |
| |) |
| Plaintiff, |) |
| |) |
| v. |) |
| |) |
| MICHAEL J. SULLIVAN, Director of |) |
| Campaign and Political Finance, et al., |) |
| |) |
| Defendants. |) |
| |) |
| |) |
| |) |
| _____ |) |

ANSWER

Defendants Michael J. Sullivan, as Director of the Office of Campaign and Political Finance (“OCPF”), Maura Healey, as Attorney General of the Commonwealth of Massachusetts, and John P. Pappas, as District Attorney for Suffolk County (collectively, “Defendants”), hereby answer the Verified Complaint filed by Plaintiff Massachusetts Fiscal Alliance (“MassFiscal”).

Introduction

1. Paragraph 1 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
2. Paragraph 2 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
3. Paragraph 3 sets forth legal conclusions, to which no response is required. To the extent

that a response to the allegations of this paragraph is required, Defendants deny those allegations.

4. Paragraph 4 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Jurisdiction and Venue

5. To the extent that Paragraph 5 purports to characterize the nature of MassFiscal's claims, no response is required. The remainder of Paragraph 5 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
6. To the extent that Paragraph 6 purports to characterize the nature of MassFiscal's claims, no response is required. The remainder of Paragraph 6 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
7. Paragraph 7 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
8. Paragraph 8 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
9. Defendants admit that Michael J. Sullivan is the Director of OCPF, and that OCPF is based in Boston, Massachusetts. The remainder of Paragraph 9 sets forth legal conclusions, to which no response is required. To the extent that a response to the

allegations of this paragraph is required, Defendants deny those allegations.

10. Defendants admit that Maura Healey is the Attorney General of Massachusetts, and that the Attorney General's Office is based in Boston, Massachusetts. The remainder of Paragraph 10 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny them.
11. Defendants admit that John P. Pappas is the District Attorney for Suffolk County, and that the Suffolk County District Attorney's Office is based in Boston, Massachusetts. The remainder of Paragraph 11 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Parties

12. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
13. Defendants admit that OCPF is a state entity that administers and enforces the Commonwealth's campaign finance laws. The remainder of Paragraph 13 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
14. Defendants admit that Michael J. Sullivan is the current Director of OCPF. To the extent that Paragraph 14 purports to characterize the nature of MassFiscal's claims, no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
15. Paragraph 15 purports to characterize statutes, which speaks for themselves. To the

extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

16. Defendants admit that Maura Healey is the current Attorney General of Massachusetts.

To the extent that Paragraph 16 purports to characterize the nature of MassFiscal's claims, no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

17. Defendants admit that John P. Pappas is the current District Attorney for Suffolk County.

To the extent that Paragraph 17 purports to characterize the nature of MassFiscal's claims, no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Facts

18. Paragraph 18 purports to characterize the nature of MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

19. Paragraph 19 sets forth legal conclusions, to which no response is required. Paragraph 19 also purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

20. Defendants admit that, at the time MassFiscal filed its Verified Complaint on October 10, 2018, the next general election in Massachusetts was scheduled for November 6, 2018. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

21. Defendants lack knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 21. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

22. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations Paragraph 22. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

23. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 23. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

24. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 24. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

25. Paragraph 25 sets forth legal conclusions and purports to characterize a statute, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

26. Defendants admit that MassFiscal has sent advertisements and communications to the OCPF for review. Defendants lack knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 26. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

27. Defendants admit that the OCPF has reviewed such communications and provided guidance to MassFiscal regarding compliance with Massachusetts campaign finance laws. Defendants admit that Exhibit A, attached to MassFiscal's Verified Complaint, is an email exchange between representatives of MassFiscal and the OCPF. To the extent that a response to the allegations of this paragraph is required, Defendants deny those

allegations.

28. Paragraph 28 purports to characterize the nature of MassFiscal's claims, to which no response is required. Defendants also lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
29. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
30. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
31. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
32. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
33. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
34. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

35. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
36. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
37. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37. Additionally, Paragraph 37 purports to characterize a document, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
38. Paragraph 38 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
39. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
40. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
41. Paragraph 41 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
42. Paragraph 42 purports to characterize a statute, which speaks for itself. To the extent that

a response to the allegations of this paragraph is required, Defendants deny those allegations.

43. Paragraph 43 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

44. Paragraph 44 purports to characterize a regulation, which speaks for itself. The remainder of the allegations of Paragraph 44 purport to state a legal conclusion, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

45. Paragraph 45 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

46. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

47. Paragraph 47 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

48. Paragraph 48 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

49. Paragraph 49 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those

allegations.

50. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

51. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

52. The allegations of Paragraph 52 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

53. Paragraph 53 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

54. Paragraph 54 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

55. Paragraph 55 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

56. Paragraph 56 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

57. Denied.

58. Paragraph 58 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
59. Paragraph 59 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
60. Paragraph 60 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
61. Paragraph 61 purports to characterize a statute and a regulation, which speak for themselves. Paragraph 61 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
62. Paragraph 62 purports to characterize a statute and OCPF guidance, which speak for themselves. To the extent Paragraph 62 sets forth legal conclusions, no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
63. Paragraph 63 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
64. Paragraph 64 purports to set forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

65. Paragraph 65 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
66. Paragraph 66 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
67. Paragraph 67 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
68. Paragraph 68 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
69. Paragraph 69 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
70. Paragraph 70 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
71. Paragraph 71 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.
72. Paragraph 72 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those

allegations.

73. Paragraph 73 purports to characterize a statute and a regulation, which speak for themselves. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

74. Paragraph 74 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

75. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75. Paragraph 75 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

76. Paragraph 76 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

77. Paragraph 77 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

78. Paragraph 78 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

79. Paragraph 79 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

80. Paragraph 80 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

81. Paragraph 81 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

82. Paragraph 82 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

83. Paragraph 83 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

84. Paragraph 84 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

85. Paragraph 85 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

86. Paragraph 86 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

87. Paragraph 87 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those

allegations.

88. Paragraph 88 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

89. Paragraph 89 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

90. Paragraph 90 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

91. Paragraph 91 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

92. Paragraph 92 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

93. Paragraph 93 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

94. Paragraph 94 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

95. Paragraph 95 sets forth legal conclusions, to which no response is required. To the extent

that a response to the allegations of this paragraph is required, Defendants deny those allegations.

96. Paragraph 96 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

97. Paragraph 97 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

98. Paragraph 98 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

99. The first sentence of Paragraph 99 sets forth legal conclusions, to which no response is required. Defendants deny the remaining allegations of Paragraph 99.

Causes of Action

100. Paragraph 100 incorporates by reference Paragraphs 1-99 of the Verified Complaint.

Defendants therefore restate and incorporate by reference their answers to Paragraphs 1-99 as if fully stated herein.

Count I

101. Paragraph 101 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

102. Paragraph 102 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny

those allegations.

103. Paragraph 103 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

104. Paragraph 104 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

105. Paragraph 105 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

106. The allegations of Paragraph 106 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Count II

107. Paragraph 107 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

108. Paragraph 108 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

109. Paragraph 109 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

110. To the extent that Paragraph 110 sets forth facts, those facts are denied. The remainder of Paragraph 110 sets forth legal conclusions, to which no response is required.

111. The allegations of Paragraph 111 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Count III

112. Paragraph 112 purports to characterize regulations, which speak for themselves.

Paragraph 112 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

113. Paragraph 113 purports to characterize a statute and a regulation, which speak for themselves. Paragraph 113 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

114. Paragraph 114 purports to characterize a statute, which speaks for itself. Paragraph 114 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

115. The allegations of Paragraph 115 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Count IV

116. Paragraph 116 purports to characterize a statute and a regulation, which speak for

themselves. Paragraph 116 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

117. Paragraph 117 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

118. Paragraph 118 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

119. Paragraph 119 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

120. Paragraph 120 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

121. The allegations of Paragraph 121 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Count V

122. Paragraph 122 purports to characterize a statute and a regulation, which speak for themselves. Paragraph 122 also sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

123. Paragraph 123 sets forth legal conclusions, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

124. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

125. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

126. The allegations of Paragraph 126 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

Count VI

127. Paragraph 127 purports to characterize a statute, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

128. Paragraph 128 purports to characterize a regulation, which speaks for itself. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

129. The allegations of Paragraph 129 purport to characterize MassFiscal's claims, to which no response is required. To the extent that a response to the allegations of this paragraph is required, Defendants deny those allegations.

The remainder of the Verified Complaint sets forth MassFiscal's requested relief and requires no response.

FIRST DEFENSE

MassFiscal's Verified Complaint fails to state a claim upon which relief may be granted.

SECOND DEFENSE

MassFiscal's Verified Complaint fails to state a claim as to which attorney's fees may be awarded.

THIRD DEFENSE

The Commonwealth's sovereign immunity and Eleventh Amendment immunity bar relief against the Defendant state officials.

FOURTH DEFENSE

The Verified Complaint does not allege injury-in-fact sufficient to establish standing to prosecute this case, and therefore this Court lacks jurisdiction over the subject matter of this action.

FIFTH DEFENSE

The claims of MassFiscal's Verified Complaint are moot because they concern communications that MassFiscal sought to make in advance of elections conducted on November 6, 2018, and therefore this Court lacks jurisdiction over the subject matter of this action.

SIXTH DEFENSE

To the extent that the claims of the Verified Complaint concern communications that MassFiscal may make in the future, the Verified Complaint fails to allege facts sufficient to state a claim on which relief can be granted.

SEVENTH DEFENSE

To the extent that the claims of the Verified Complaint concern communications that MassFiscal may make in the future, such claims are not yet ripe, and therefore this Court lacks jurisdiction over the subject matter of this action.

ADDITIONAL DEFENSES

Defendants reserve the right to raise any and all defenses that may become apparent or available during the course of the proceedings in this case.

Respectfully submitted,

/s/ Julie E. Green

Julie E. Green, BBO # 645725
Abrisham Eshghi, BBO# 703020
Assistant Attorneys General
Office of the Attorney General
Government Bureau
One Ashburton Place
Boston, MA 02108
(617) 963-2085
Julie.Green@mass.gov
Abrisham.Eshghi@mass.gov

CERTIFICATE OF SERVICE

I certify that this document, filed through the Court's ECF, system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants by first-class mail on December 18, 2018.

/s/ Julie E. Green _____

Julie E. Green

Assistant Attorney General