



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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WILLIAM C. CAMPBELL
DIRECTOR

November 14, 2024

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Tania Fernandes Anderson
Anderson Committee
175 Humboldt Avenue
Boston, MA 02121

Re: CPF-24-15

Dear Ms. Anderson:

This office has completed its routine analysis of the Anderson Committee's (the "Committee's") campaign finance reports for the period November 2023 through September 2024. As a result of this review, we have concluded that the Committee did not comply with multiple provisions of M.G.L. c. 55, the Massachusetts campaign finance law.

1. Late Disclosure of Deposits

The campaign finance law requires political committees to file timely campaign finance reports that accurately reflect the Committee's financial activity. All contributions over \$50 must be itemized in those reports. See M.G.L. c. 55, §§ 18 and 19. During the course of its review, OCPF concluded that the Committee failed to e-file deposit reports to disclose contributor information in a timely manner.

Candidates for Boston City Council must disclose contributor information by e-filing deposit reports by the 5th of each month. Between November 2023 and August 2024, approximately \$34,500 was deposited into the Committee's bank account. However, approximately \$32,900 of the \$34,500 in contributor information was not timely filed. It was only after numerous letters, phone calls, and emails from OCPF staff, that the Committee e-filed the required deposit reports.

The Committee's delay in filing the reports frustrated the goal of the campaign finance law's requirement of accurate and timely disclosure and violated M.G.L. c. 55, §§ 18 and 19.

2. Excess Contributions

During the course of the review, OCPF noted that the Committee received various excess contributions in 2023 and 2024.

a. Excess Individual Contributions:

Section 7A of the campaign finance law limits individual contributions to \$1,000, in the aggregate, during any calendar year. In both 2023 and 2024, the Committee received contributions



from individuals that exceeded the \$1,000 statutory limit. During 2023, the Committee received a total of \$1,500 in excess contributions from two individuals, while in 2024, one donor made an excess contribution of \$250.

To resolve the matter of excess individual contributions received in 2023 and 2024, the Committee purged \$1,750 to the Commonwealth on September 26, 2024.

b. Excess Contribution from Candidate's Committee:

In 2023, the Committee received two \$100 contributions from the Committee to Elect Elizabeth Miranda. One contribution was received in January 2023, while the second contribution was received in August 2023. Section 6 of the campaign finance law limits the amount that one candidate's committee can contribute to another candidate's committee. Such contributions may not exceed \$100 in the aggregate per calendar year. Accordingly, OCPF determined that the Committee received a \$100 excess contribution from a candidate's committee.

To resolve this matter, the Anderson Committee refunded the Miranda Committee the \$100 excess contribution, but the refund did not occur until April 2024.

3. Late Clarification of Expenditures

The campaign finance law requires committees to file timely and accurate campaign finance reports, which includes providing the payee name and the purpose information for all expenditures over \$50. See M.G.L. c. 55, §§ 18 and 19. OCPF previously notified the Committee of its obligation to clarify forty-six expenditures, totaling approximately \$14,400 that occurred through the campaign account between November 2023 and September 2024. After numerous letters, phone calls, and emails from OCPF staff, the Committee appended its bank reports to clarify the expenditures.

By failing to timely provide complete expenditure information, the Committee did not comply with Sections 18 and 19 of the Massachusetts campaign finance law. Additionally, the Committee's delay in filing the reports frustrated the goal of the campaign finance law's requirement of accurate and timely disclosure.

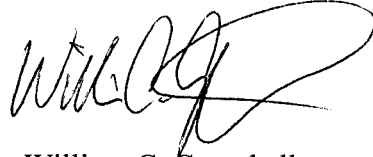
The Committee's late disclosure of contributor information, excess contributions received, and late disclosure of details relating to expenditures did not comply with the campaign finance law. However, because the appropriate remedial actions have taken place, OCPF has determined that no further action is warranted at this time. Additionally, to ensure future compliance with the campaign finance law, you have agreed to appoint a new treasurer for the Committee. You should be aware that further instances of noncompliance may result in referral to the Attorney General pursuant to Section 3 of the campaign finance law.

In accordance with a ruling by the Supervisor of Public Records, this letter and all related correspondence is a matter of public record. As such, it will be placed in the Committee's public

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file. If you have any questions regarding this or any other campaign finance matter do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Campbell", with a large, sweeping flourish at the end.

William C. Campbell
Director

WCC/mj

cc: Louis Roca, Treasurer
Anderson Committee