THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE
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October 7, 2026

Kathleen Baxter
Baxter Committee
14 Fay Road
Scituate, MA 02066

Re: CPF-26-40

This office has completed its review of a complaint alleging that, as a public employee, you sent out text messages inviting recipients to attend a fundraiser organized by the Baxter Committee ("the Committee"), a committee organized on your behalf. Based on our review, and for the reasons that follow, OCPF has determined that you did not comply with M.G.L. Chapter 55, the campaign finance law.

Section 13 of the campaign finance law prohibits any person "employed for compensation, other than an elected officer, by the commonwealth or any county, city, or town" directly or indirectly soliciting or receiving contributions for a candidate for public office. This restriction applies at all times, in all places, and not just during the workday. Even if the public employee is also an elected official, they are restricted from directly or indirectly soliciting or receiving contributions for a candidate for public office. The restriction also applies to fundraising for a public employee's own campaign for public office. Fundraising by a committee organized on behalf of a public employee is exempt from the restrictions as long as no public employee is involved in the fundraising activities. Section 13 further prohibits a public employee from serving as the treasurer of any political committee.

In June 2026, you were a candidate for State Representative seeking election. To support your candidacy, your Committee planned a fundraising event, which was held on June 19, 2026. Your Committee designed a graphic invitation for the event, which stated that the event was paid for and authorized by the Committee. However, in the weeks leading up to this event, you personally sent out text messages that included the graphic invitation. As a result of these text messages, one recipient made a $50 donation to your Committee. You stated that no other contributor received a text message from you.

You have acknowledged that you are currently a public employee and that you held this position at the time that you sent the text messages. Based upon our review, we have concluded that your distribution via text message of a fundraising invitation did not comply with Section 13. To resolve this matter, you have purged $50 from your Committee account to the Scituate

Food Pantry on September 23, 2026. Because appropriate remedial action was taken and we expect the guidance provided as a result of this review will ensure compliance with the campaign finance law in the future, OCPF has determined that no further action is warranted at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a public record and a copy will be placed in the Committee's file. A copy may also be provided to the person(s) who brought this to our attention. If you have any questions regarding this or any other campaign finance matter, do not hesitate to contact this office.

Sincerely,

William C. Campbell
Director

WCC/db

cc: James Joseph Nelson, Jr., Treasurer
Baxter Committee