

WILLIAM C. CAMPBELL
DIRECTOR

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

ONE ASHBURTON PLACE, ROOM 411
BOSTON, MASSACHUSETTS 02108

TEL: (617) 979-8300
(800) 462-OCPF
FAX: (617) 727-6549

February 12, 2026

Rebecca Connors
Central Massachusetts Conservatives PAC
53 South Ashburnham Road
Westminster, MA 01473

Re: CPF-25-65

Dear Ms. Connors:

This office has completed its analysis of the Central Massachusetts Conservatives Political Action Committee (the "Committee's") campaign finance reports for the period January 2025 through December 2025. As a result of this review, we have concluded that the Committee did not comply with the Massachusetts campaign finance law, M.G.L. c. 55.

1. Timely and Accurate Disclosure of Deposits

The campaign finance law requires political committees to file timely campaign finance reports that accurately reflect financial activity. All contributions and expenditures 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 accordance with the required filing deadlines. Between January 2025 and December 2025, \$3,361 was deposited into the Committee's bank account. However, contributor information for \$2,795 during this period was not timely filed. OCPF also identified numerous reporting errors on the Committee's e-filed deposit reports. During the course of this review by OCPF staff, the Committee e-filed the required deposit reports to match deposited items into the Committee's bank account.

2. Excess Cash Contributions

M.G.L. c. 55 § 9 prohibits cash contributions in excess of \$50 in the aggregate from individuals in a calendar year. Our review found that the Committee received a total of \$120 in excess cash contributions from three individuals in 2025. To resolve this matter, the Committee purged the total amount excess contributions to the Commonwealth on February 9, 2026.



3. Spending Outside of the Depository Bank Account

As a political action committee registered with OCPF, the Committee was required to designate a financial institution as the depository bank to file reports. See M.G.L. c. 55, §19. For those committees required to designate a depository, all payments for campaign purposes made by or for the benefit of the committee which are in excess of \$100 shall be made only from funds on deposit in the depository account and be disclosed in a timely manner. OCPF found that you used personal funds in the amount of \$300 to make a committee related expenditure in February 2025. While this expenditure should have occurred through the depository bank account, the Committee took corrective action to disclose this activity and filed an external activity report on April 1, 2025.

4. Prohibited Withdrawals

During the course of the review, OCPF noted that three withdrawals were made from the Committee's depository bank account. Between August 18, 2025 and October 24, 2025, a total of \$370 was withdrawn from the campaign account. A political committee may not make cash withdrawals from the depository account for any purpose. Additionally, the committee's debit card may not be utilized for the purpose of obtaining cash at an ATM. See 970 CMR 2.09(2)(b). In the future, you must refrain from making such cash withdrawals. To resolve this matter, the Committee purged the total amount of prohibited withdrawals to the Commonwealth on February 9, 2026.

5. Failure to Keep Detailed Records

The campaign finance law requires that treasurers of political committees keep and preserve detailed accounts, vouchers, and receipts of all contributions received, expenditures made, and any other campaign finance activity. See M.G.L. c. 55, §§ 2 and 5 and 970 CMR 1.10(2). During the course of the review, OCPF determined that the Committee's recordkeeping was not adequate.

6. Resolution

Based upon the findings of our review, we have determined that the Committee did not comply with the requirements of the campaign finance law with respect to those matters set forth above. Further, the delay in filing required reports frustrated the public's interest in accurate and timely disclosure of campaign finance activity during the relevant period.

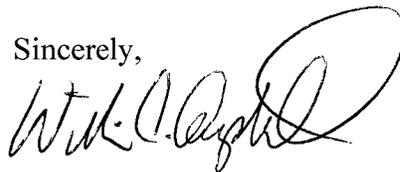
To resolve this matter, the Committee has filed the deposit reports to accurately reflect contributor information and has filed a report to disclose out-of-pocket spending. Additionally, the Committee has made a \$1,000 payment to the Commonwealth, which includes the purges from the Committee account, as noted above, and the costs of review by OCPF. Because appropriate remedial action was taken and because we anticipate that the guidance

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provided as a result of this review will ensure future compliance with the campaign finance law, we have determined that no further action is warranted at this time. However, you should be aware that further instances of noncompliance with the campaign finance law may result in referral to the Attorney General in accordance with 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 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 "William C. Campbell", with a large, stylized flourish at the end.

William C. Campbell
Director

WCC/mj