

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

June 24, 2025

Mike Fadel, Treasurer  
Committee for High Standards Not High Stakes  
2 Heritage Drive, 8th Floor  
Quincy, MA 02171

Re: CPF-25-04

Dear Mr. Fadel:

This office has completed its review of a complaint alleging that the Committee for High Standards Not High Stakes (“the Committee”) failed to timely disclose contributions it received prior to the November 5, 2024 election. Based on our review, and for the reasons that follow, OCPF has determined that the Committee did not comply with M.G.L. Chapter 55, the campaign finance law.

A ballot question committee is a political committee “which receives or expends money or other things of value for the purpose of favoring or opposing the adoption or rejection of a specific question or questions submitted to the voters.” See M.G.L. c. 55, § 1. All existing committees organized to support or oppose a question on a state ballot are required to file periodic reports with OCPF.

In addition, every ballot question committee that files with the director, which receives and deposits a contribution in the amount of \$500 or more after the eighteenth day, but more than 72 hours, before the date of a special, preliminary, primary or general election, shall file an additional report to disclose the information required by this section. This report, called the late contribution report, must be filed within 72 hours of depositing such contribution. See M.G.L. c. 55, § 18(i). If in-kind contributions valued at \$500 or more are received during the late contribution reporting period, a late contribution report must be filed to disclose those contributions. See 970 CMR 1.18(1). An in-kind contribution is something of value that is not money, which is contributed to a candidate or political committee.

The Committee was formed to support the passage of Question 2, which appeared on the November 5, 2024 statewide ballot, relative to replacing the MCAS high school graduation requirement. In this instance, the late contribution reporting period began on October 19, 2024, and ended on November 1, 2024.

During the late contribution period for the general election, the Committee received a number of contributions, both monetary and in-kind. The Committee filed two late contribution reports during this period. The first late contribution report was filed on October 25, 2024,




disclosing \$150,000 in receipts, as well as \$3,465.92 in in-kind contributions. The second late contribution report was filed on October 26, 2024 disclosing \$3,951,845.79 in in-kind contributions.

However, on its November 5<sup>th</sup> report, the Committee disclosed that it had also received eleven contributions during the late contribution reporting period that were not reflected in late contribution reports, totaling \$2,372,885.04. Of these eleven contributions, the Committee received four monetary contributions totaling \$800,000 and seven in-kind contributions totaling \$1,572,885.04. The receipt and utilization of these eleven contributions should have been disclosed in late contribution reports, due within 72 hours of receipt or utilization. Since multiple late contributions can be reported on a single report, at a minimum four additional reports should have been filed. Although the Committee accurately disclosed all of these contributions in its November 5th report, the Committee's failure to file the required late contribution reports frustrated the public's interest in accurate and timely disclosure of campaign finance activity during the relevant period.

As a result of this review, OCPF determined that the Committee did not comply with M.G.L. c. 55, § 18(i) by failing to timely disclose the receipt of contributions that should have been reported on a minimum of four separate late contribution reports leading up to the November 5, 2024 election. To resolve this matter a payment has been made on behalf of the Committee to the Commonwealth in the amount of \$4,000, which represents the statutory penalty of \$1,000 for each non-filed report. Further, the Committee has amended its dissolution report to reflect an additional in-kind contribution to cover the cost of the payment. OCPF notes that the Committee cooperated with this review. Therefore, in view of the above, OCPF has determined that no further action will be taken at this time.

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 and a copy may be provided to the person(s) who brought this matter to our attention. If you have any questions regarding this or any other campaign finance matter, please 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/db