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March 19, 2026

Ronald Koning, President
State Electric LLC
2 DeAngelo Drive
Bedford, MA 01730

Re: CPF 25-35

Dear Mr. Koning:

Following a routine audit, this office has completed its review of certain contributions made to the Carlo DeMaria Committee (the "Committee").

During OCPF's review, you confirmed that four employees of State Electric used their personal credit card to make contributions to the Committee, each in the amount of \$1,000, in March 2025 (totalling \$4,000). Each of these contributions were made to the Committee using ActBlue, a digital fundraising platform. The on-line contribution form requires contributors to certify that the contribution is made with the contributor's own personal credit card and not with a corporate or business credit card and that the contribution is made from their own funds and they are not being provided funds by another person or entity. See 970 CMR 1.09(2). State Electric subsequently provided funds to each employee to reimburse them for the contributions made in their names to the Committee. The contributors completed the on-line form via ActBlue, certifying that the contributions were made by the individual using their personal funds, when in fact the funds were reimbursed by State Electric.

M.G.L. c. 55, § 10 prohibits any person from making political contributions in the name of another person for the purpose of disguising the true origin of the contribution. Based on our review, this office has determined that State Electric's actions in reimbursing employees for political contributions made in their individual names did not comply with Section 10 of the campaign finance law.

M.G.L. c. 55, § 8 states that business corporations may not "directly or indirectly" contribute to a candidate. The statute also prohibits officers or agents acting on behalf of a corporation from making such contributions using corporate money. By providing these funds to the Committee and making these reimbursements totalling \$4,000 to the employees, State Electric did not comply with Section 8.

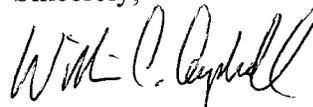


OCPF has no reason to believe that the Committee had knowledge that the contributions were reimbursed by State Electric until it was so notified during OCPF's review. The contributions were made using ActBlue and the named contributors stated that the contributions were made by them personally. It would have appeared to the Committee, absent other information, that the contributions were, in fact, from those individuals. The Committee has agreed to disgorge \$4,000, which represents the total amount of prohibited contributions the Committee received from contributors referenced in this letter. The disgorgement will be made in a manner consistent with the residual funds clause of M.G.L. c. 55, § 18, no later than April 15, 2026.

Further, to resolve this matter, State Electric has made a payment to the Commonwealth in the amount of \$8,000. Because appropriate remedial action has been taken as outlined herein and OCPF believes that the guidance provided during the course of this review will ensure future compliance with the campaign finance law, we have concluded that no further action is warranted at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record.

Sincerely,



William C. Campbell
Director

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