

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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May 6, 2025

Jonathan Lima
Lima Committee
92 Theodore Street
Fall River, MA 02720

Re: CPF-26-02

Dear Mr. Lima:

This office has completed its review of a complaint related to your campaign for Fall River City Council in 2025. Based on our review, and for the reasons that follow, OCPF has determined that you did not comply with the campaign finance law.

On August 12, 2025, OCPF was notified by the City of Fall River that you qualified for the ballot as a candidate for City Council in 2025. As a candidate for city council, you were required to designate a financial institution as the campaign's depository bank. See M.G.L. c. 55, § 19. On August 19, 2025, you organized your Committee and filed a D103 Appointment of Depository Bank form with OCPF.

The campaign finance law states that, for those candidates and committees required to designate a depository bank, all campaign finance activity, including expenditures made using the candidate's own funds, must flow through the designated depository account and be disclosed in a timely manner. See M.G.L. c. 55, § 19. Additionally, Section 19 requires expenditures in excess of \$100 to be made by Committee credit or debit card, or by using checks drawn directly on a committee's depository bank account.

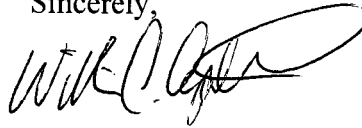
During our review, we determined that between September 28, 2025 and October 10, 2025, you spent a total of \$1,739.84 on miscellaneous campaign expenses, all with your own funds, and all outside of the depository system of disclosure. This campaign activity transacted outside of your Committee's depository account did not comply with Section 19 of the campaign finance law. On April 8, 2026, with the assistance of OCPF staff, you filed an external activity report to fully disclose all of your out-of-pocket spending. Although the activity was subsequently disclosed in the Committee's external activity report, the activity was not timely disclosed, which frustrated the public's interest in accurate and timely disclosure of campaign finance activity.



Because appropriate remedial actions have taken place as outlined, OCPF has determined that no further action is warranted at this time. We expect that the guidance provided during the course of this review will result in future compliance with the campaign finance law. However, 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. Additionally, the failure to file a campaign finance report in the future may result in OCPF initiating legal proceedings that could prevent your name from appearing on a state or local ballot in Massachusetts. See M.G.L. c. 55, § 3.

In accordance with a ruling by the Supervisor of Public Records, this letter is a public record. As such, it will be placed in your 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", written in a cursive style.

William C. Campbell
Director

WCC/ef

cc: Kimberly Rua, Treasurer
Lima Committee