

**COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN AND POLITICAL FINANCE**

**DISPOSITION AGREEMENT**

This Disposition Agreement is entered into on January 5<sup>th</sup>, 2026, by and between the Office of Campaign and Political Finance (“OCPF”), Chynah Tyler (the “Candidate” or “Tyler”) and the Committee to Elect Chynah Tyler (the “Committee”), in which the parties mutually agree, for the purposes of this Agreement, as follows:

**I. INTRODUCTION**

1. The Committee, at all times relevant to this Agreement, was a duly organized political committee subject to the provisions of M.G.L. c. 55, the Massachusetts campaign finance law.
2. The Committee is a political committee organized on March 23, 2016 on behalf of Tyler, in her capacity as a candidate for the State House of Representatives for the 7<sup>th</sup> Suffolk District. Tyler currently serves as the incumbent representative of the 7<sup>th</sup> Suffolk District.
3. OCPF has the authority to review and investigate the legality, validity, completeness, and accuracy of all reports required to be filed and all actions required to be taken by political committees, candidates, campaign treasurers, and any other person pursuant to M.G.L. c. 55 or any other laws of the Commonwealth relative to campaign contributions and expenditures.
4. This Agreement relates to the Committee’s financial activity between January 2024 and October 2025.

**II. FACTS**

1. During a routine audit review of the Committee’s financial activity in the relevant period, OCPF identified the following issues:

A. Late Disclosure of Deposits

OCPF found that the Committee failed to e-file deposit reports to disclose contributor information in accordance with the required filing deadlines. Between May 31, 2024 and June 28, 2024, \$13,770.78 was deposited into the Committee’s depository bank account. However, deposit reports, to disclose contributor details were not filed with OCPF in a timely manner. All of these deposit reports have been filed by the Committee.

B. Late Clarifications of Expenditures

OCPF noted that the Committee did not timely clarify sixty-two expenditures totaling \$17,414.20. The Committee subsequently appended its bank reports to clarify the expenditures.

C. Excess Contributions

During the review, OCPF found that the Committee received excess contributions from three individuals in 2024. A total of \$900 in excess contributions were deposited into the campaign account.

D. Personal Use

OCPF requested the Committee to provide further details, including bills, invoices, or other documentation reflecting the purpose of certain expenditures in the amount of \$5,918.49, that were made from the campaign account between April 1, 2025 and June 30, 2025. The Committee provided OCPF with records for expenditures totaling \$921.48. The Committee identified expenditures totaling \$497.40 that were “personal expenses made in error.” The Committee failed to provide OCPF with records relating to expenditures totaling \$4,499.61, that were made from the campaign bank account between April 2025 and June 2025.

Additionally, the Committee identified expenditures totaling \$228.83 that were made in July 2025, that were also “personal expenses made in error”. The Committee appended its April 2025 through July 2025 bank reports to accurately disclose the activity and the Candidate personally reimbursed the Committee on August 29, 2025, the sum of \$726.23 for the expenditures identified as “personal expenses made in error.” The Committee subsequently identified four other expenditures totaling \$100.97, that occurred between August 7, 2025 and October 20, 2025, that were also “personal expenses made in error”. The Committee appended its August 2025 through October 2025 bank reports to accurately disclose the activity and the Candidate personally reimbursed the Committee \$100.97 on November 25, 2025.

E. Unauthorized Withdrawals from Depository Bank Account

The Committee’s reports disclosed the following prohibited expenditures that were made from the depository bank account:

1. In June 2024, the Committee used Venmo and Paypal to make four expenditures, however the Committee’s use of these platforms did not comply with the campaign finance law as the bank report did not reflect the name of the vendor. The Committee subsequently amended the report to clarify the expenditures.

2. In February 2025, the Committee made four withdrawals from the campaign account totaling \$6,700. OCPF requested the Committee provide details and records for each of

the transactions described below:

- a. The Committee disclosed that two of the expenditures, namely \$3,035 and \$2,500, were campaign related expenses and were made using cashier's checks. Upon request, the Committee provided OCPF supporting documentation, including invoices from the vendors.
- b. The Committee stated that the \$900 withdrawal was for the purchase of a bank check, and further stated that the purpose was to refund the three individuals who made excess contributions in 2024, as referenced above in II(1)(C). The Committee, however, was not able to provide OCPF with supporting documentation and there was no evidence provided to indicate that the donors received refunds of their excess contributions.
- c. The Committee was also not able to account for a \$265 withdrawal.

### **III. OCPF CONCLUSIONS**

#### **1. M.G.L. c. 55, §§18 and 19 – Disclosure**

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. The Committee did not file timely deposit reports in 2024 to disclose \$13,770.78 in contributor information and the Committee's failure to timely clarify its expenditures in 2024 and 2025 violated Sections 18 and 19. The Committee did not comply with Section 19 when it failed to utilize the Committee's credit/debit card or checks drawn directly on the Committee's depository account to make campaign expenditures.

#### **2. M.G.L. c. 55, §6 and 970 CMR 1.10(9) & 970 CMR 2.06 – Expenditures Made for Personal Use**

Section 6 of the campaign finance law prohibits the use of campaign funds for any expenditure that is "primarily for the candidate's or any other person's personal use." M.G.L. c. 55, §6 and 970 CMR 2.06. Any committee expenditure that is not supported by bills, receipts, or other documentation reflecting the purpose of the expenditure creates a presumption that the expenditure was made for personal use. 970 CMR 1.10(9) and 970 CMR 2.06.

The Candidate and the Committee violated Section 6, as described above in Section II(D) and II(E)(2), when a total of \$5,664.61 in Committee funds were used for the Candidate's personal use. The Committee, during its own review, identified an additional \$827.20 in erroneous personal expenditures and the Candidate promptly has personally reimbursed the Committee this amount.

3. M.G.L. c. 55, § 7A – Excess Individual Contributions Received

Section 7A prohibits the receipt of individual contributions in excess of \$1,000 in the aggregate during any calendar year. The Committee violated Section 7A, when it received contributions from three individuals in 2024 that exceeded the \$1,000 limit.

4. M.G.L. c. 55, §§ 2 and 5 and 970 CMR 1.10(2) – Failure to Keep Detailed Records

Sections 2 and 5 of the campaign finance law state that candidates and treasurers of political committees must keep and preserve detailed accounts, vouchers, and receipts for all contributions received, expenditures made, and any other campaign finance activity. See also 970 CMR 1.10(2). OCPF has determined that the Candidate and the Committee failed to keep records consistent with the requirements of the campaign finance law.

#### **IV. RESPONDENTS' POSITION**

I gave birth in Winter 2025 and experienced limited mobility during that time, which impacted my ability to personally oversee certain campaign finance activities.

During this period, I continued to meet with constituents, community leaders and other qualified professionals. These meetings were in compliance with M.G.L. c. 55, consistent with my commitment to transparency and adherence to all legal obligations related to campaign contributions and expenditures.

With respect to the OCPF findings identified during a routine review and audit of my committee's finances between January 2024 and October 2025, I respond as follows:

Late Disclosures of Deposits: My committee did their best to take corrective action to ensure that all contributor information was fully disclosed in accordance with OCPF requirements.

Late Clarification of Expenditures: My committee took corrective action to provide the required clarifications to ensure transparency and compliance.

Excess Contributions: Going forward, the committee will ensure that any excess contributions are refunded using committee checks.

Personal Use: OCPF identified personal expenses that were made in error. We corrected these errors by personally reimbursing the committee to ensure full compliance.

Unauthorized Withdrawal from Bank Account: We took appropriate action to comply with all requirements to ensure transparency and compliance.

## V. RESOLUTION

In order to resolve the matter now before OCPF, the parties agree, pursuant to M.G.L. c. 55, §3 and 970 CMR 3.07(1), as follows:

1. Tyler will personally pay \$6,000 to the Commonwealth in the nature of a civil forfeiture. Said payment shall be made according to the following schedule:
  - a. \$1,000 due upon execution of this Agreement; and
  - b. \$500 due on or before the last day of each month for the period January 2026 through October 2026.
2. If Tyler fails to pay the amounts set forth herein on or before the respective due dates, the entire balance then remaining shall be immediately due and payable, with payment due in full within fourteen (14) business days of the missed due date. There is no restriction or prohibition on Tyler prepaying any amount due as long as the minimum payment of \$500 is paid each month as set forth in 1(b) above.
3. The Committee agrees to provide OCPF with copies of all invoices, receipts and other supporting documentation relating to all Committee expenditures for in camera inspection for a period of six (6) months from the date of this Agreement. Said documentation shall be provided to OCPF no later than the 15th day of the month following the month in which the expenditure was made. Such records shall be returned to the Committee upon completion of the inspection. If OCPF determines that the Committee has substantially complied with its production requirements under this paragraph, and with its reporting obligations as set forth in M.G.L. c. 55, OCPF may, in its discretion, release the Committee from this requirement prior to the conclusion of the six-month period referenced herein, with written notice of said release.
4. The Committee and Tyler understand their obligation to and agree to comply with all requirements of M.G.L. c. 55, the campaign finance law, and regulations promulgated thereunder.
5. OCPF agrees not to refer the Committee or Tyler to any other governmental agency, including, without limitation, the Office of the Attorney General, for any failure to comply with the provisions of M.G.L. c. 55 cited herein, with respect to the conduct that is specifically referenced in this Agreement.
6. OCPF may, at any time, review compliance with this Agreement. If it believes that the provisions of this Agreement have been violated, after notice to the Committee and Tyler, OCPF may, notwithstanding the provisions of the foregoing paragraph, proceed with any action



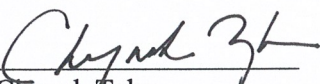
consistent with M.G.L. c. 55 or otherwise authorized by law without the necessity of further hearings under Section 3.

7. This Agreement shall be binding upon OCPF, Chynah Tyler, the Committee to Elect Chynah Tyler and Committee Treasurer Jonathan Daigle, and their successors in interest.

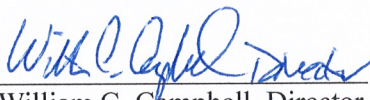
8. The parties have entered into this Agreement, knowingly and voluntarily, in an effort to resolve all matters set forth in the Agreement.

9. This Agreement is a public record under M.G.L. c. 4, §7 and shall be subject to public inspection as required by M.G.L. c. 66, §10.

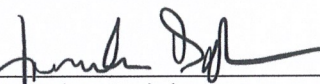
**THE COMMITTEE TO ELECT  
CHYNAH TYLER**

By:   
Chynah Tyler  
Candidate and Individually

**OFFICE OF CAMPAIGN AND  
POLITICAL FINANCE**

By:   
William C. Campbell, Director

**THE COMMITTEE TO ELECT  
CHYNAH TYLER**

By:   
Jonathan Daigle  
Treasurer and Individually