

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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May 14, 2026

Bella Wong, Superintendent  
Public Schools of Brookline  
333 Washington Street  
Brookline, MA 02445

Re: CPF-26-18

Dear Superintendent Wong:

This office has completed its review of a complaint we received which alleged that Public Schools of Brookline (“PSB”) resources were used to influence voters with respect to a ballot question appearing on the Town ballot in the May 5, 2026 election.

In Anderson v. City of Boston, 376 Mass. 178 (1978) appeal dismissed, 439 U.S. 1069 (1979), the Supreme Judicial Court concluded that the City of Boston could not appropriate funds, or use funds previously appropriated for other purposes, to influence a ballot question submitted to the voters at a state election. The court stated that the campaign finance law, M.G.L. c. 55, demonstrates an intent “to assure fairness of elections and the appearance of fairness in the electoral process” and that the law should be interpreted as prohibiting the use of public funds “to advocate a position which certain taxpayers oppose.” 376 Mass. at 193-95.

Accordingly, this office has stated that public resources may not be used to influence an election. Public resources include, but are not limited to, staff time and email systems. See IB-91-01 and IB-04-01. Public resources may not be used to distribute unrequested information relative to a ballot question, absent specific statutory authority to do so. See Mass. Const. Art. CVIII and M.G.L. c. 54, §§ 53-54 (establishing a mechanism for the Secretary of the Commonwealth to provide information to voters via distribution of the “red book”); M.G.L. c. 53, § 18B (establishing a mechanism for local government officials to provide information to voters).

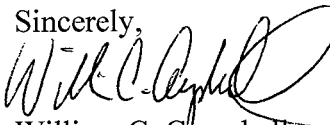
In this matter, the complaint alleged that public resources – in the form of PSB staff time and the school district’s email system – were used to distribute information relative to the May 5 ballot question. On March 26, 2026, you sent an email to PSB families and staff shortly after the Brookline Select Board placed the May 5 question on the ballot. The email, although not expressly advocating a vote for or against the ballot question, discussed how passage of the override would be a positive outcome for PSB. Those conclusions, distributed to PSB staff and families, could influence the ballot question submitted to voters. OCPF subsequently worked



with you and Brookline Town Counsel to ensure that no further public resources were used to influence the election.

As a result of this review, OCPF has determined that use of PSB staff time and email systems to distribute the email relative to the May 5 ballot question did not comply with Anderson and M.G.L. c. 55. Pursuant to Section 22A of the campaign finance law, the treasurer of a city, town, or governmental unit which expended any money or any valuable thing in order to influence or affect the vote on any local ballot question submitted to the voters of the municipality shall file reports with the local clerk, setting forth the amount or value of every expenditure. When instructed to do so, the Town Treasurer filed a CPF Form 22A (Report of Governmental Treasurer) with the Brookline Town Clerk prior to the May 5 election. Further, to resolve the matter, you personally reimbursed the PSB for the costs of distribution and staff time in the amount of \$84.76. Because further action under Section 22A lies with the local clerk and OCPF expects this review will ensure future compliance with the campaign finance law, our review has been closed at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record. A copy is being provided to the local clerk. If you have any questions regarding this or any other campaign finance matter, do not hesitate to contact this office.

Sincerely,  
  
William C. Campbell  
Director

WCC/ef

cc: Jonathan Simpson, Brookline First Assistant Town Counsel  
Ben Kaufman, Brookline Town Clerk