

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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January 3, 2024

Massachusetts Majority Independent Expenditure PAC
c/o Chris Ashby, Esq.
Ashby Law
625 North Washington Street, Suite 325
Alexandria, Virginia 22314

Dear Mr. Ashby:

This office has completed its review of campaign finance activity undertaken by Massachusetts Majority Independent Expenditure Political Action Committee (“MMIEPAC” or the “Committee”). As a result of this review, we have concluded that the Committee did not comply with M.G.L. c. 55, the Massachusetts campaign finance law.

Section 9 of the campaign finance law limits cash contributions to \$50 per person, per calendar year, in the aggregate, while contributions made by money order, bank check, treasurer’s check, cashier’s check, or other similar instrument are limited to \$100 per person, per calendar year, in the aggregate. A review of the Committee’s records relative to contributions received in November 2021 disclosed that one contribution, reported as \$25,000 from John McCarthy, was actually made via a treasurer’s check. Therefore, the Committee received and deposited an excess treasurer’s check contribution in the amount of \$24,900.

Although the Committee provided documentation to support their position that the funds were, in fact, the funds of the reported contributor, the campaign finance law is clear that contributions in excess of \$100 in the aggregate in a calendar year may not be made using treasurer’s checks, even if the source of the funds used to purchase the treasurer’s check are ultimately those of the named contributor. Further, the statute makes no exception to the restriction on tender types for independent expenditure PACs or ballot question committees; as a result, even though an individual may give without limit to either of those committees pursuant to M.G.L. c. 55, those contributions must be made in accordance with the tender type requirements set forth in Section 9.

To resolve this matter, and in recognition of the fact that MMIEPAC dissolved and does not have any remaining funds, the Committee’s chairperson has made a personal donation of \$25,000 to a charity. The donation was made on behalf of the Committee, to purge the full amount of the treasurer’s check that was received, and, as such, the Committee’s reports reflect the receipt of an in-kind contribution from the chair in the amount of \$25,000.

In accordance with a ruling by the Supervisor of Public Records, this letter and all related



Massachusetts Majority IEPAC

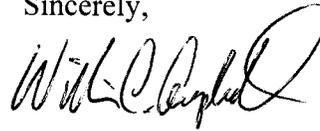
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correspondence is a matter of public record. As such, it will be placed in the Committee's public file.

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". The signature is fluid and cursive, with a large loop at the end.

William C. Campbell
Director

cc: Charles Gantt, Treasurer