

OCPF REPORTS

Massachusetts Office of Campaign and Political Finance

New OCPF Director Appointed

Woburn City Clerk William C. Campbell was selected in late February to serve as OCPF's next director, replacing Michael J. Sullivan of Newburyport, also a former city clerk.

Campbell is expected to start at OCPF in April.

He was appointed by a commission made up of Secretary of the Commonwealth William Galvin, the chair of the state Democratic Party, Gus Bickford, the chair of the state Republican Party, Jim Lyons, and Boston College Law School Dean Vincent Rougeau.

Campbell was appointed city clerk of Woburn in 1997 and is the past president of the Massachusetts City Clerks Association. He is a graduate of Boston College and earned a J.D. from Quinnipiac University School of Law, formerly known as the University of Bridgeport School of Law. He is also a former Woburn alderman.

Sullivan retired from OCPF in late 2019, but returned as director pro tem during most of the COVID-19 emergency. He started as OCPF director in 1994.

Weston tops per capita donor list in 2020, with Newton as top city

Residents in Weston gave more per capita in 2020, \$23.24, than any other community in the state, according to an OCPF review of campaign finance data. The Metrowest town was also first in 2018 at \$33.27 per capita.

OCPF's review of **contributions from individuals to candidates who file with the state** showed that the towns of Weston, Dover (\$19.08) and Brookline (\$18.64) gave the most per capita.

Among the top 25 municipalities, 21 were towns and four were cities, including Newton, Cambridge, Boston and Braintree. Among cities, New Bedford reported the lowest per capita average of 45 cents.

[Click here](#) for the full 2020 list (not all towns are listed because some had no reported contributions).

The median contribution for all cities and towns was \$1.44 per person in 2020, a state election year.

Individuals are permitted to contribute up to \$1,000 per calendar year to a candidate. Candidates are not required to itemize contributions of \$50 or less.

2020 PER CAPITA TOP 10

	Total	Per Capita
Weston	\$261,707	\$23.24
Dover	\$106,632	\$19.08
Brookline	\$1.1 million	\$18.64
Newton	\$1.1 million	\$13.10
Manchester BTS	\$63,894	\$12.44
Granville	\$19,185	\$12.25
Norwell	\$127,084	\$12.10
Cohasset	\$87,744	\$11.63
Wellesley	\$325,470	\$11.63
Milton	\$280,244	\$10.38

Note: Based on the 2010 U.S. Census

New Educational Videos



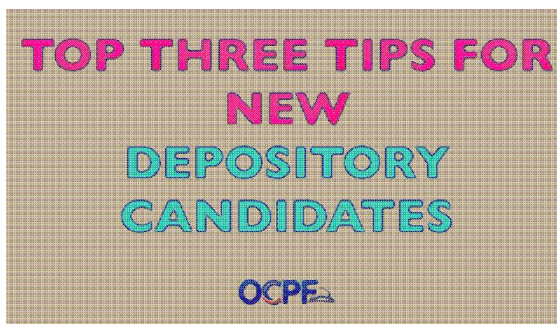
Individuals are often asked to contribute to candidates, sometimes because they belong to entities such as businesses, unions and other organizations. [Click here](#) for a short tutorial, with donors in mind.



FAQ: I'm running for office in town. Do I need to form a committee if I self-fund?

ANSWER: OCPF recommends forming a committee. However, municipal candidates may run for office without forming a political committee.

Please [watch this video](#) to learn more.



[Click here](#) for the top three tips.

THE USE OF PERSONAL VEHICLES FOR CAMPAIGN/COMMITTEE WORK

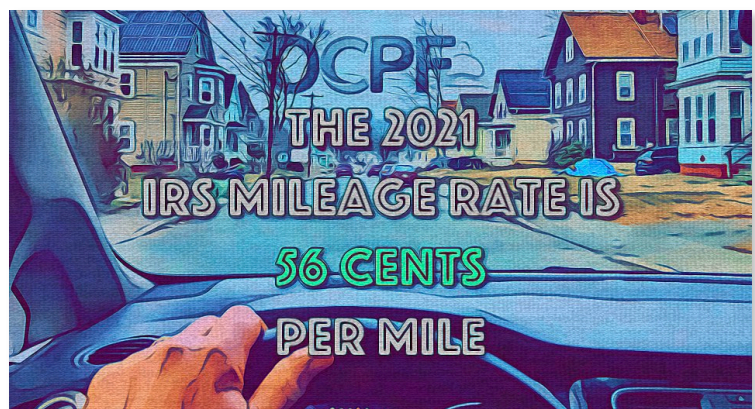
FAQ: I use my personal vehicle to get to political events in my community and across the state. Can the campaign pay for the use of my vehicle?

ANSWER: Campaigns may reimburse individuals for the use of their personal vehicles for campaign and committee work. To be reimbursed, the individual must keep an internal mileage log, showing where they went, for what reason and the total miles. The individual can be reimbursed at the IRS mileage rate.

Note: Incumbents who are compensated for their travel costs by a government entity may not also reimburse themselves using committee funds.

[Click here](#) for OCPF's memo on the use of vehicles.

[Click here](#) for OCPF's memo on the use of vehicles for House and Senate candidates.



Recent Cases and Rulings

OCPF audits all campaign finance reports and reviews all complaints alleging violations of the campaign finance law. These audits and reviews may result in enforcement actions or rulings (below). The identity of any complainant is kept confidential. Public resolution letters and disposition agreements are matters of public record once cases are concluded.

Disposition Agreements

A disposition agreement is a voluntary written agreement entered into between the subject of a review and OCPF, in which the subject agrees to take certain specific actions.

Tewksbury lawmaker signs agreement with OCPF to settle disclosure issues

3/4/2021: State Rep. David A. Robertson of Tewksbury agreed to a total civil forfeiture payment of \$2,000 to resolve issues of non-disclosure in his 2020 reelection campaign, according to a disposition agreement between the candidate and OCPF. Robertson acknowledged that during the 2020 primary and general elections, he personally spent \$15,399 without utilizing his campaign bank account, according to the disposition agreement. The expenditures, using the candidate's personal funds, included door hangers, letters and signs, and newspaper and Facebook advertisements. Because the expenditures were not made using the committee bank account, there was not timely disclosure of campaign activity. The disposition agreement, [available here](#), was signed by Michael Sullivan, OCPF's director pro tem, and Robertson.

Public Resolution Letters

A public resolution letter may be issued in instances where the office found "no reason to believe" a violation occurred; where "no further action" or investigation is warranted; or where a subject "did not comply" with the law but, in OCPF's view, the case is able to be settled in an informal fashion with an educational letter or a requirement that some corrective action be taken. A public resolution letter does not necessarily imply a wrongdoing on the part of a subject and does not require agreement by a subject.

[CPF-20-118](#): Environmental League of Massachusetts Action Fund. No reason to believe (disclosure); 12/1/2020. Independent expenditures paid for by the Environmental League of Massachusetts Independent Expenditure PAC appeared on the Environmental League of Massachusetts Action Fund Facebook page. OCPF concluded that the IEPAC complied with the disclosure requirements of the campaign finance law, and there is no reason to believe that the two entities violated the campaign finance law by posting ads on the Action Fund's Facebook page.

[CPF-20-129](#): Rep. Elizabeth Miranda, Boston. Did not comply (disclosure); 1/22/2021. In 2020, the campaign made expenditures outside the depository bank account totaling \$4,074. The campaign finance law requires activity to take place through the designated campaign bank account, to ensure timely and accurate public disclosure.

Recent cases continued on the next page

Continued: Recent Cases and Rulings

[CPF-20-138](#): Kerby Roberson, Milton. Did not comply (disclosure); 1/29/2021. The Roberson Committee did not file deposit reports for \$4,552 in bank-reported deposits. The committee also did not file a 2020 year-end report by the Jan. 20, 2021, deadline.

[CPF-21-04](#): Marc Silvestri, Revere. Did not comply (public employee, public buildings); 2/23/2021. Silvestri was a candidate for state representative and also a city employee. To support his candidacy, the committee solicited campaign funds on its Facebook page. On the same Facebook page, Silvestri posted information describing his past accomplishments and making personal statements to support his candidacy. These statements appear to have been made by the candidate rather than the committee, and as such were not consistent with the campaign finance law (public employees may not solicit contributions, directly or indirectly). The committee also sent seven e-mail solicitations to government e-mail addresses. The campaign finance law prohibits the solicitation of funds in buildings used for governmental purposes.

[CPF-21-02](#): Josh Mason, Dennis. Did not comply (excess contributions); 3/19/2021. The candidate reported \$16,200 in candidate loans to his campaign for state representative. However, following an OCPF review of records, it was determined that the \$16,200 in deposits that were reported as candidate loans were, in fact, contributions from the candidate's parents. The candidate resided in a condominium owned by his parents and made payments to them in accordance with a lease to purchase agreement. The candidate indicated that, each month, a portion of the rent he pays is set aside and intended to be used as a down payment on the condominium. When he accepted the funds from his parents, it was his understanding that he was borrowing against his future assets. The campaign finance law limits contributions from individuals to \$1,000 per calendar year. To resolve the issue, the committee agreed to dissolve and make payments, totaling \$2,000, to the state's general fund.

[CPF-21-11](#): Rep. Danielle Gregoire, Marlborough. Did not comply (disclosure); 3/24/2021. The committee, in 2020, did not e-file timely deposit reports to disclose contributor information between August and October, totaling approximately \$8,320. The committee also did not clarify more than 35 expenditures in a timely manner (the campaign finance law requires committees to disclose the purpose of itemized expenditures).

Advisory Opinion

An advisory opinion is a letter written in response to a request for the OCPF director to render an opinion concerning the application of the campaign finance law.

[AO-21-02](#): A candidate may use campaign funds to purchase personal protective equipment, including bullet-proof vests/body armor, pepper spray and gas masks for themselves and/or their staff members.

OCPF LEGAL DEPARTMENT

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2021 CITY ELECTIONS

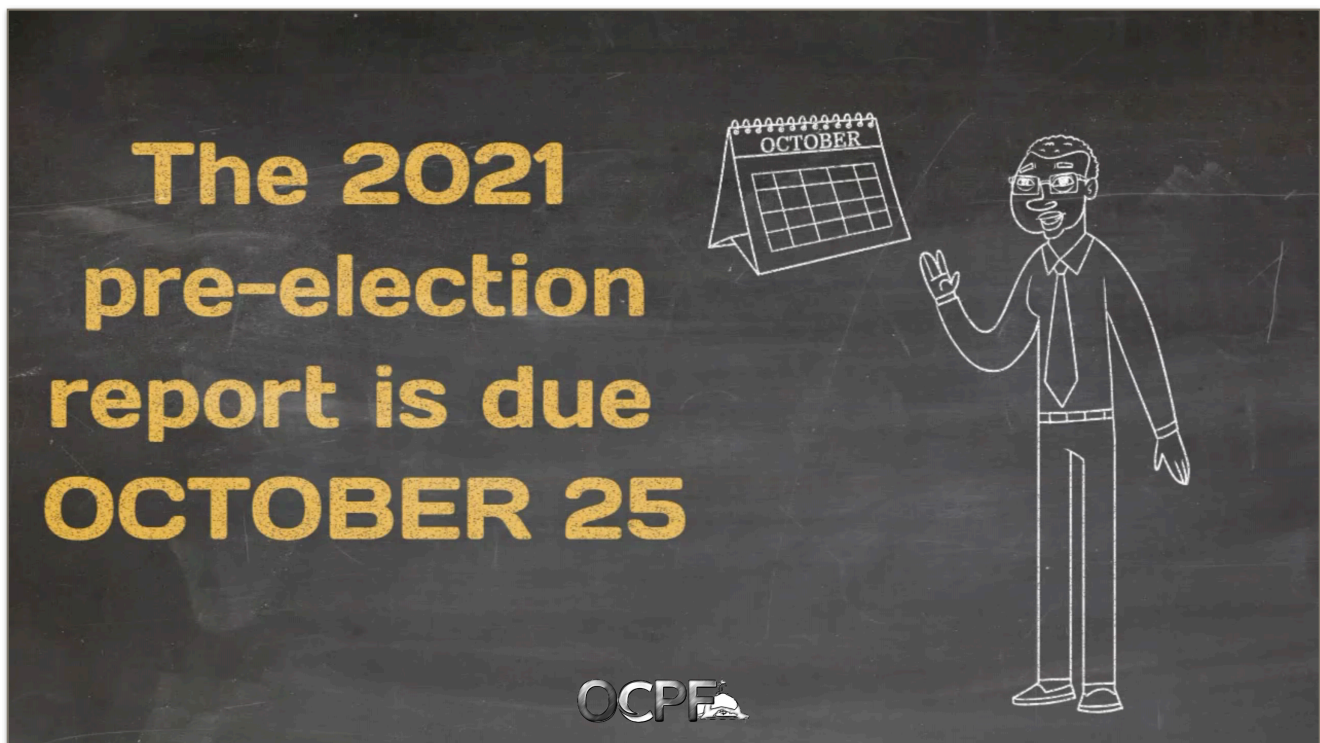
Who files with OCPF?

All mayoral candidates file with OCPF, as well as city council candidates in cities with populations of 65,000 or more. These candidates DO NOT file the pre-preliminary and pre-election reports.

Who files with their local election officials?

All other city candidates file with local election officials. These candidates will file the pre-preliminary report eight days prior to the preliminary election, if their names appear on the preliminary ballot. Local filers submit the pre-election report by Oct. 25, and a year-end report in January, 2022.

[Click here for a short informational video](#)



2021: House and Senate

Legislative candidates file deposit reports after making a deposit, to disclose itemized donor information (one deposit = one deposit report). **The best practice is to file the deposit report within three days of making a deposit.**

However, the statute requires deposit reports to be filed at least quarterly in 2021.

2021 Deposit Report Filing Schedule

Due by April 20, covering Jan. 1 through March 31

Due by July 20, covering April 1 through June 30

Due by Oct. 20, covering July 1 through Sept. 30

Due by Jan. 20, 2022, covering Oct. 1 through Dec. 31

[CLICK HERE FOR A SHORT OVERVIEW OF THE DEPOSITORY SYSTEM FOR HOUSE AND SENATE CANDIDATES](#)

FYI: No deposit? No deposit report is required.

Jones Campaign E-Mail Contact List

Supporter	E-Mail Address
John Tavner	Jt617@gmail.com
Leslie Claret	lclaret@mass.state.com
Dennis McClaren	mcdman@aol.com
Kathleen Munroe	Kathleen.munroe@umass.edu
Kurtwood	ksmith@yahoo.com
Julian	rl...ty.gov.us
Michael	...aol.com
Ch...	...@gmail.com

The campaign finance law prohibits soliciting or receiving funds in buildings used for governmental purposes.

Accordingly, campaigns should not send campaign materials and solicitations to government e-mail addresses.

Campaigns should scrub their e-mail lists of government email addresses.

Please [click here](#) for OCPF's guide on the issue.



In 2020, a majority of contributions reported by candidates to OCPF came from credit or debit cards.

Of the nearly 100,000 contributions reported by candidates in 2020, approximately 55 percent were made by credit or debit card via vendors such as ActBlue, PayPal and WinRed, according to a review by OCPF.

Checks made up nearly 42 percent, and cash and money orders accounted for less than 1 percent of reported contributions to candidates in 2020.

Political committees that accept contributions by credit or debit card should review OCPF's tutorial on accounting for merchant provider fees ([video here](#)).

A graphic with a blue background featuring a faint, stylized image of a person's head and shoulders. Overlaid on this is the text "PUBLIC FINANCING" in large, bold, white letters with a blue outline, and "2022 OVERVIEW" in smaller, bold, white letters with a blue outline below it.

PUBLIC FINANCING

2022 OVERVIEW

THE STATE ELECTION CAMPAIGN FUND OFFERS MATCHING FUNDS TO QUALIFIED STATEWIDE CANDIDATES. FOR EVERY DOLLAR RAISED BY A CANDIDATE IN 2021 AND 2022, UP TO \$250 PER DONOR (FROM INDIVIDUALS ONLY), A CANDIDATE IS ELIGIBLE TO RECEIVE A MATCHING DOLLAR FROM THE STATE (LIMITS APPLY, DEPENDING ON THE OFFICE SOUGHT).

IN THE LAST FOUR STATEWIDE ELECTION CYCLES, NEARLY \$5 MILLION WAS DISTRIBUTED TO CANDIDATES.

[CLICK HERE FOR A 3-MINUTE OVERVIEW OF THE STATE ELECTION CAMPAIGN FUND.](#)



2020 PAC ACTIVITY

Traditional Political Action Committees in Massachusetts reported raising \$5.1 million and spending \$4.5 million in calendar year 2020, a state election year.

There are more than 250 PACs organized with OCPF, not including Independent Expenditure PACs. Traditional PACs may contribute up to \$500 per year to individual candidates.

[CLICK HERE](#) for a list of PACs and their activity.

Year	Receipts	Expenditures
2020	\$5.1 million	\$4.5 million
2019	\$5.2 million	\$3.7 million
2018	\$5.9 million	\$4.9 million
2017	\$5.3 million	\$4.3 million
2016	\$4.9 million	\$5.1 million

TOP 10 PAC EXPENDITURE TOTALS, 2020

1199 SEIU MA PAC	\$721,207
MA & Northern NE Laborers' District Council PAC	\$576,982
Pipefitters Local 537 PAC	\$428,815
Retired Public Employees PAC	\$368,026
International Brotherhood of Electrical Workers Local 103 PAC	\$367,253
Committee for a Democratic House PAC	\$136,401
Chapter 25 Associated the Nat'l Drive PAC (Teamsters)	\$130,087
Ironworkers Union Local 7 PAC	\$94,542
Int'l Brotherhood of Electrical Workers Local Union 2222 PAC	\$92,544
Painters District Council #35 PAC	\$80,500

2020 Independent Expenditure PAC Activity

Independent expenditure political action committees (IEPACs) reported spending \$1.8 million in 2020, mostly to support or oppose House and Senate candidates.

Independent expenditures made by IEPACs expressly advocate for the election or defeat of a candidate, but without coordinating with candidates and their campaigns. They may receive unlimited contributions, and make unlimited expenditures.

By far, the Massachusetts Majority IEPAC reported the most expenditures — \$1.3 million, primarily for digital advertising and direct mail to support candidates. During the same calendar year, Massachusetts Majority reported \$1.2 million in contributions.

A complete list of IEPAC spending in 2020:

Independent Expenditure PAC	2020 Expenditures	2020 Receipts
Mass. Majority IEPAC	\$1,285,242	\$1,177,500
Mass. Realtor IEPAC	\$178,327	\$197,347
Mass. Values IEPAC	\$136,461	\$160,000
Mass. Teachers Association IEPAC	\$93,795	\$51,787
Democrats for Education Reform IEPAC	\$43,462	\$0
Environmental League of Mass. IEPAC	\$32,377	\$55,000
Sierra Club Mass. IEPAC	\$16,333	\$16,350
Professional Fire Fighters of MA IEPAC	\$9,300	\$31,735
Chinese Progressive IEPAC	\$8,900	\$54,870
Priorities for Progress IEPAC	\$1,500	\$1,500
Pro-Pueblo Mass. IEPAC	\$1,269	\$5,000
TOTAL	\$1,806,965	\$1,751,089

Spending totals do not include administrative costs, such as rent or food for volunteers. The total above is only for communications utilized to support or oppose candidates. [Click here](#) for a complete list of all 2020 contributions to IEPACs.

The 2020 election year included House and Senate candidates, as well as Governor's Council and some county races. There were no statewide candidates on the ballot.

IEPACs, also known as Super PACs, originated in 2010 after two court decisions. In the Supreme Court's [Citizens United vs. FEC](#) decision, the court ruled that independent expenditures by corporations that are made to influence candidate elections cannot be limited, because doing so would not be consistent with the First Amendment. The second court decision, [SpeechNow.org vs. FEC](#), held that individuals, corporations and other groups can provide funds without limit to independent expenditure-only committees (IEPACs). This decision was made by the U.S. Court of Appeals in D.C.

In addition to IEPAC activity, groups, entities, businesses, organizations and traditional PACs also make independent expenditures to support or oppose candidates. In 2020, such groups and traditional PACs reported \$383,097 in independent expenditures to support or oppose candidates. A majority of that spending, \$306,758, was reported by the 1199 SEIU MA PAC.

[Click here](#) for OCPF's webpage for IEPAC activity. [Click here](#) for OCPF's disclosure page for groups or traditional PACs that make independent expenditures.