

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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February 6, 2019

Evandro Carvalho
Carvalho Committee
17 Corwin Street, #1
Dorchester, MA 02122

Re: Disclosure of Campaign Finance Activities; CPF-18-95

Dear Mr. Carvalho:

This office has completed its review of your Committee's financial activity during 2017 and 2018. The Committee cooperated with OCPF's review.

In 2017, you were an incumbent State Representative and disclosed campaign activity through OCPF's non-depository reporting system under Section 18 of Chapter 55, the Massachusetts campaign finance law. Based on the review, which included reconciliation by OCPF staff of the Committee's campaign finance reports to the Committee's bank statements, we have determined that the Committee violated the disclosure requirements of Section 18.

Specifically, the Committee deposited \$7,650 during the mid-year reporting period (January 1 through June 30, 2017), but did not initially disclose \$7,500 in receipts (including at least seven contributions from political action committees). During this period, the Committee originally disclosed only one \$150 contribution.

Additionally, during the 2017 year-end reporting period (July 1 through December 31, 2017), the Committee's disclosure of contributions was inaccurate, as the Committee duplicated the reporting of many contributions. The Committee also initially failed to disclose approximately \$2,650 in expenditures during this reporting period.

The Committee, with OCPF's assistance and the hiring of an outside consultant, has now amended its 2017 mid-year and year-end reports to accurately disclose its activity.

On March 2, 2018, you filed a Form CPF 101 P: Change of Purpose with OCPF. As a candidate for District Attorney in Suffolk County, you were required to designate a financial institution as your depository bank and file reports under Section 19 of Chapter 55. Section 19 specifies that all campaign finance activity must take place through a designated depository account and be disclosed in a timely manner.



Evandro Carvalho

February 6, 2019

Page 2

The Committee's deposits into the Committee's bank account between August 23, 2017 and September 17, 2018 totaled approximately \$21,000. Deposit reports disclosing these contributors were not e-filed, however, until November of 2018 and January of 2019, well after your name was on the ballot.

The campaign finance law requires that all funds received by a candidate or his committee must be deposited into the depository bank account no later than the end of the seventh day following receipt. See M.G.L. c. 55, § 19(b). By not disclosing your campaign donors in a timely manner, Section 19 was violated and the voters of Suffolk County were unable to determine the identity of those who financially supported your campaign.

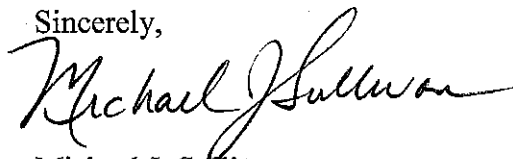
Additionally, the Committee did not respond to OCPF's requirement to clarify three expenditures made in May and August of 2018, totaling approximately \$946. The Committee eventually filed clarifications.

The Committee, if the candidate runs for office in 2019, will be required to provide OCPF with documentation of all contributions deposited. Such documents shall include copies of checks and email correspondence from any merchant provider utilized by the Committee.

We now believe accurate, though significantly late, disclosure of your campaign activity has occurred. The Committee filed amendments to accurately disclose its 2017 and 2018 activity. We expect that the guidance provided in this letter, should you decide to run for office again, will result in future compliance with the campaign finance law. Please note, however, that further instances of noncompliance with the campaign finance law could result in referral to the Attorney General in accordance with Section 3 of the campaign finance law.

In accordance with an opinion issued by the Supervisor of Public Records, this letter is a public record. If you have any questions regarding this or any campaign finance matter, please contact this office.

Sincerely,



Michael J. Sullivan
Director

MJS/sh