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December 3, 2019

Charles T. Hinds
Cambridge Citizens Coalition PAC
6 Donnell Street
Cambridge, MA 02138

Re: CPF-19-118

Dear Mr. Hinds:

This office has completed its review of a complaint we received regarding the activity of Cambridge Citizens Coalition ("CCC"). The complaint alleged that CCC was raising money to support candidates without first organizing as a political committee.

The campaign finance law defines a political action committee (a "PAC") as a political committee that receives contributions, makes expenditures or incurs liabilities for the purpose of influencing the nomination or election of candidates. See M.G.L. c. 55, § 1. Sections 5 and 19 of the campaign finance law require a PAC to file a statement of organization and, if organized to support or oppose candidates within the depository system of reporting, to appoint a depository bank. See M.G.L. c. 55, § 5, 19. All of the PAC's campaign finance activity must be conducted through the PAC's depository bank account, and reflected accurately and timely in regular campaign finance reports. See M.G.L. c. 55, § 18, 19.

CCC was initially formed in May 2019. Its mission, as identified on CCC's website, is to "...support smart, responsible growth, affordable housing, sustainability, the preservation of our environment, and the enduring importance of our architectural legacy." Its board is comprised entirely of Cambridge residents who volunteer their time to CCC.

In the fall of 2019, CCC updated its website to include a section dedicated to the November 2019 election. The "Election" section included an announcement that CCC was holding an open forum for all city council candidates, with the following description:

"Now that the citywide plan known as the Affordable Housing Overlay has been put on hold by City Council, to possibly be reengaged once the new Council is elected, it is critical that we elect a new council that is not beholden to developer money and funding from other self-interested groups. We need a Council who will work with residents and neighborhoods and in a way that is at once transparent and accountable. We need YOUR help to do this, so please help us financially so that we can publicize our candidate slate based on the core principles of CCC and our members."



From May 2019, when CCC was first formed, through early October 2019, CCC raised approximately \$9,100, all from individual donors and members of CCC. In that same time, CCC spent approximately \$350 on a post office box, rental of an auditorium for the above-referenced candidates' forum, and other miscellaneous expenses. CCC did not make any contributions to candidates.

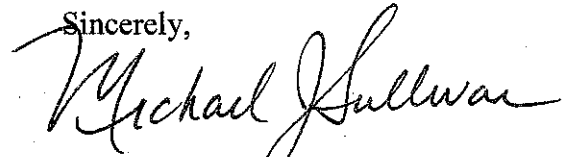
Based on our review of CCC's activity, we have concluded that CCC was acting as a PAC within the meaning of the campaign finance law when it solicited and received funds for the purpose of influencing the 2019 Cambridge city election. Accordingly, CCC's failure to timely organize as a PAC and open a depository account, and its failure to timely disclose its financial activity, did not comply with the campaign finance law, M.G.L. c. 55.

Once notified of this issue by OCPF, CCC promptly filed the necessary forms to organize a related political action committee, CCC PAC, and disclosed all of its activity with OCPF. CCC also transferred all funds remaining in its account to CCC PAC.

Based upon our conversations with you and other CCC volunteers, we believe that CCC's lack of compliance was unintentional and the result of a misunderstanding of the campaign finance law. Therefore, because CCC has now taken the appropriate remedial action, and because we believe that the guidance provided as a result of this review will ensure future compliance with the campaign finance law, no further action is required and this matter may be closed at this time. CCC should be careful in the future, however, to ensure that any fundraising related to the support of or opposition to candidates must be undertaken and accurately disclosed by CCC PAC, and not by CCC.

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 person(s) who brought this matter to our attention.

Sincerely,



Michael J. Sullivan
Director

MJS/mc

cc: Suzanne Blier, Chairperson