



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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October 30, 2017

Andrea Harrington
268 Lenox Road
Richmond, MA 01254

Re: CPF-17-120

Dear Ms. Harrington:

This office has completed its review of your Committee's financial activity during 2016. The Committee cooperated with OCPF's review.

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 did not comply with the disclosure requirements of Section 18 of M.G.L. c. 55, the Massachusetts campaign finance law. Specifically, the Committee did not initially disclose \$6,450.00 in receipts and \$321.19 in expenditures. The Committee, however, has amended its reports as required to accurately disclose this activity.

The Committee also received four business contributions, totaling \$800.00. Section 8 states that no corporation shall directly or indirectly give, pay, expend or contribute, any money or other valuable thing for the purpose of aiding, promoting or preventing the nomination or election of any person to public office.

In addition, during the period under review, the Committee made ATM withdrawals totaling \$683.00. See 970 CMR 2.09(2)(b), which states that a candidate or political committee may not use a debit card for the purpose of obtaining any cash advance or loan of money.

Finally, the Committee received excess individual contributions totaling \$850.00. Section 7A limits individual contributions to \$1,000, in the aggregate, during any calendar year.

The Committee has agreed to the following: (1) the Committee has filed amended 2016 reports to accurately disclose all of the Committee's financial activity; (2) the Committee has reduced the liabilities owed to the candidate by the amount of business contributions received (\$800.00) and excess individual contributions received (\$850.00); (3) the candidate and the Committee will no longer use the Committee's debit card to withdraw cash from an ATM; and (4) the Committee will ensure accurate and complete disclosure when filing campaign finance reports in the future by providing to OCPF a copy of any 2018 campaign finance report that is filed locally by the Committee.



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OCPF has determined that the errors made by the Committee were inadvertent in nature and because the Committee has taken remedial action described above, we have determined this matter may be closed at this time.

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

Sincerely,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a long horizontal line extending to the right.

Michael J. Sullivan
Director

MJS/jt