

WILLIAM C. CAMPBELL
DIRECTOR

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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November 30, 2021

Leonard Lee
Committee to Elect Leonard Lee
11 Mather Street
Dorchester, MA 02124

Re: CPF-21-69

Dear Mr. Lee:

This office has completed its review of a complaint we received regarding campaign finance activity for the Committee to Elect Leonard Lee (the "Committee") in 2021. The complaint alleged that the Committee did not make or disclose payments made for two billboards on or near Blue Hill Avenue in Boston that advertised support for your candidacy.

M.G.L. c. 55, §§ 18 and 19 require all depository candidates and committees to conduct all campaign activity through the campaign's designated depository account, and to timely file complete and accurate campaign finance reports disclosing all contributions received, expenditures made, and liabilities incurred during the relevant reporting period. M.G.L. c. 55, § 8 prohibits the receipt of anything of value, whether monetary or in-kind, from corporations.

In conversations with OCPF staff, you indicated that you contracted for the billboards at the inception of your candidacy, with the understanding that the owner's normal business practice was to bill for the short-term use of the billboards at the end of the contract term. The owner of the business confirmed that practice in communications with OCPF, indicating that he typically bills out for billboards approximately twice per year, but for anything less than one year, he typically waits until the billboards are removed to invoice for the full amount.

After speaking with OCPF, you and the owner of the billboards readily agreed to arrange for an invoice to be issued to the Committee immediately. The invoice was issued on August 5, 2021, for \$6,959.38, which represented the full cost of the billboards for the contracted period. The Committee paid the first half of the invoiced amount on August 13, 2021, which was disclosed in the Committee's August bank report. The Committee paid the remaining balance on September 8, 2021, as reflected in the Committee's September bank report.

Based upon our review of your Committee's campaign finance activity, OCPF has determined that there is no reason to believe the Committee failed to comply with the requirements of the campaign finance law. Although the Committee was not initially invoiced for the billboards, the delayed invoicing

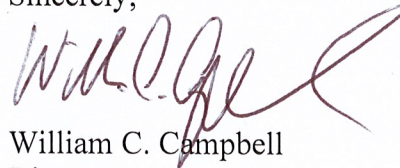


Leonard Lee
November 30, 2021
Page 2

was consistent with the existing business practices of the owner, and not done for the purpose of supporting the candidate. Once the need for more frequent billing and disclosure was made clear to both the Committee and the owner of the billboards, both parties promptly took the appropriate action to ensure that an invoice was issued and immediately paid. These actions ensured that at least one payment for the billboards was publicly disclosed prior to the September 14, 2021 primary election. Therefore, because we believe that the guidance provided as a result of this review will result in future compliance, no further action is required, and this matter may be closed at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record. A copy may be provided to the person(s) who brought this matter to our attention.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Campbell", with a large, sweeping flourish extending to the right.

William C. Campbell
Director

cc: Greg Sydney, Treasurer

WCC/mc