



August 17, 2021

William C. Campbell, Director
Office of Campaign and Political Finance
John W. McCormack Building
One Ashburton Place, Room 411
Boston, MA 02108

Re: Request for legal review and complaint against the “Coalition to Protect Workers’ Rights” for violating state campaign finance laws and failure to make required disclosures of corporate fundraising and spending on ballot committee

Dear Director Campbell:

On Tuesday, August 3, the so-called “Coalition to Protect Workers’ Rights” (CPWR) filed both a Statement of Organization and an initial financial report with your office. The report showed contributions and expenditures beginning in June, including general expenditures totaling \$25,036.62 for a consultant’s services beginning in May.

This letter requests that the Massachusetts Office of Campaign and Political Finance (OCPF) investigate the CPWR for violations of state campaign finance law M.G.L. c. 55, §7 by receiving contributions and making expenditures months before forming a committee.

As the Supreme Judicial Court held in the formative years of OCPF, Chapter 55 as appearing in St. 1975, c. 151, §1 is comprehensive legislation “intended to reach all political fundraising and expenditures within the Commonwealth.” *Anderson v. City of Boston*, 376 Mass. 178, 186 (1978). For the last forty-three years, OCPF has taken that to mean that fundraising that is not authorized by Chapter 55 is precluded by it. Checking a box on CPF Form 101 BQ does not excuse the obvious fact that CPWR raised and expended funds without having taken the steps to permit it to do so.

It may also be the case that the CPWR had no intention of violating section 7 and were relying on OCPF Memorandum 98-04 cited in notes 2 and 3 of their August 9 “complaint” to you. They may have believed expenditures they reported on August 3 were not reportable until the sixtieth day prior to the 2022 election, as set forth in the Answer to Question 1 of that memorandum. They may have believed that their efforts to educate voters regarding an issue which may or may not become a ballot question required no filing, based on the response to Question 17. Similarly, they may have believed that their research and polling, their drafting of materials to oppose certification or to oppose the underlying concept set forth in their Statement of Organization required no previous filings with you based on the “No” answers to Questions 6, 7 and 8.

But if they believe those things, they could not in good faith have complained to you about the Massachusetts Coalition for Independent Work.

In any event, none of the answers in OCPF’s Memorandum 98-04 as revised would authorize the violation of section 7 by the CPWR. Please accept this letter as a complaint and request for investigation.

Very truly yours,

A handwritten signature in black ink, appearing to read "Josh Gold". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Josh Gold

Massachusetts Coalition for Independent Work