



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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November 10, 2015

15656
Joao DeAndrade
Carpenter Committee
333 Warren Avenue, Suite 1
Brockton, MA 02301

RE: 10/1/15 through 10/31/15 bank reports

Dear Mr. DeAndrade:

As you know, the Massachusetts campaign finance law requires this office to review all reports to ensure that such reports are legal, complete and accurate. Our standard practice is to conduct an analysis of all reports filed by your bank on your behalf as they are received by this office.

Our routine review of these reports indicates that the following issues may need additional information or clarification to ensure complete and accurate public disclosure as required by M.G.L. c. 55.

Issue #1: Excess Contribution(s) Received

Your reports indicate that your committee received the following contribution(s) that appear to exceed the calendar year limit of \$1,000 that an individual can contribute to a candidate's committee:

<u>Date</u>	<u>Contributor</u>	<u>Amount</u>
4/20/2015	Cashman, Jay	\$1,000.00
10/17/2015	Cashman, Jay	\$500.00
4/20/2015	Cook, Peter	\$300.00
10/2/2015	Cook, Peter	\$750.00
4/20/2015	King, Douglas	\$1,000.00
10/2/2015	King, Douglas	\$500.00

Please review your records. If an excess contribution was received, the committee should refund the excess amount to the individual and provide OCPF with a copy of the cancelled check.

Issue #2: Missing Deposit Report(s)

Candidates for statewide, governor's council, county, district and certain municipal offices; state political action committees, people's committees and the state political party committees are required to electronically file Deposit Reports. It appears that you have not yet electronically submitted reports for the following deposit(s):

<u>Deposit Date</u>	<u>Amount</u>
10/7/2015	\$242.45

In order to provide complete disclosure and to ensure compliance with the campaign finance law, please electronically file the missing contribution information.

Issue #3: Missing Reimbursement (R1) Report(s)

When an individual is reimbursed by a political committee for expenditures made on behalf of the committee, a report of the reimbursement must clearly identify both the individual being reimbursed and the vendor (the recipient / payee) of each expenditure made by that individual. Your bank has reported the following expenditure(s):

<u>Date</u>	<u>Payee</u>	<u>Amount</u>	<u>Purpose</u>
10/14/2015	Alves Grocery	\$160.00	campaign food
10/6/2015	Antonio Miranda	\$500.00	radio advertising
10/1/2015	Eugenia Andrade	\$800.00	radio advertising
10/26/2015	Eugenia Andrade	\$400.00	tv, radio
10/6/2015	Julio Nogueina	\$1,000.00	radio advertising
10/6/2015	Maria Lopes	\$200.00	campaign election food
10/13/2015	Mark Lawton	\$627.60	luncheon reimbursement
10/20/2015	Patricia Sanon Eliassaint	\$750.00	radio advertising
10/9/2015	Patricia Sanon Elrassaint	\$500.00	live campaign promotion
10/13/2015	Tony Silva	\$400.00	tv, radio
10/23/2015	Vilal Alves	\$200.00	audio radio commercial

Since the above does not clearly describe the underlying expenditure activity, Reimbursement (R1) report(s) should be filed. In order to provide complete disclosure, please electronically file these reports.

Also, please keep in mind that reimbursements for expenditures made on behalf of the committee may not exceed \$100. M.G.L. c. 55, s. 19(c) requires all payments for campaign purposes which are in excess of \$100 to be made by checks drawn on the committee's campaign account.

Issue #4: Missing Purpose Information

Your bank reported the following expenditure(s) without disclosing any purpose information. Please append this information to your committee's electronically filed report(s). An instruction sheet has been enclosed.

<u>Date</u>	<u>Payee</u>	<u>Amount</u>
10/20/2015	Community Newspaper	\$1,400.00
10/28/2015	Community Newspaper	\$400.00
10/20/2015	CV Electronica	\$200.00
10/28/2015	Dunkin	\$165.00
10/22/2015	Facebook	\$250.28
10/30/2015	Facebook	\$500.14
10/9/2015	Google	\$50.00
10/21/2015	Google	\$200.00
10/19/2015	Joe Angelos	\$83.60
10/5/2015	NWS Staples	\$190.95
10/20/2015	Staples	\$59.26
10/5/2015	Urban Public Safety	\$278.28
10/26/2015	Wal-Mart	\$962.53

Issue #5: Missing or Incomplete Occupation and Employer Information

The campaign finance law requires candidates and committees to request and disclose the occupation and employer for all contributors who give \$200 or more to a candidate or political committee in a calendar year. The law requires you to request this information at the time of solicitation, and if not received, to follow up with one written request. Your recently filed reports include records of individuals who have contributed \$200 or more but:

- Do not disclose their occupation and employer,

- Indicates that letters have been sent asking for additional information, or
- Includes ambiguous or incomplete information like "Businessman" or "Self-Employed."

For more information on how to disclose occupation and employer information please refer to Advisory Opinion 95-07 which can be found in the Legal Resources section of our website, <http://www.ocpf.us>.

If you have not already written to all contributors to request their occupation and employer, you should do so now. If you have asked for the information and the contributor has provided it to you, please add this information to your receipt records using Reporter 6 (an instruction sheet is enclosed). For those contributors who have not responded to your request, please send copies of the original letters to our office. After our review, we will return the letters to your committee.

Issue #6: Clarification of Expenditure to Vendor Requested

M.G.L. c. 55, section 18D requires the disclosure of any payments made by a vendor to any subvendor if:

- * the yearly aggregate paid by the committee to the original vendor exceeds \$5,000; **and**
- * the yearly aggregate paid to any one **subvendor** by the original vendor exceeds \$500.

This disclosure is accomplished by filing a Subvendor (SV-1) Report which itemizes each subvendor receiving more than \$500, the date the subvendor received such payment, the subvendor's address, the amount, and the purpose of the payment.

Your report discloses the following payments to vendors:

<u>Date</u>	<u>Payee</u>	<u>Amount</u>	<u>Purpose</u>
10/19/2015	Prospect Hill Co	\$10,851.63	campaign mailing out postage
10/19/2015	Prospect Hill Co	\$2,385.31	campaign signage & forms
10/22/2015	Prospect Hill Co	\$7,664.78	postage

Please contact the above noted vendor(s), in writing, requesting that they provide your committee with the required subvendor information or, alternatively, provide your committee with a written statement stating that NO SUBVENDORS were used. Accordingly, your

committee should provide OCPF with one of the following:

* an electronically filed Subvendor (SV-1) Report detailing the information provided by the vendor;

* a copy of the letter from the vendor indicating that no subvendors were used in providing the goods or services purchased by the committee; or

* a copy of your letter requesting the required information from the vendor if the vendor does not respond within 14 days of the date of your letter. A sample letter has been included for your convenience.

In accordance with a ruling by the Supervisor of Public Records, this letter and all correspondence relating thereto is a matter of public record as of the requested response date listed below. As such, it will be placed in the committee's public file at that time.

Please respond to this request within three weeks of the date of this letter. Feel free to contact me if you have any questions concerning this matter or need additional information in order to fulfill this request.

Sincerely,



Shane Slater

sslater@cpf.state.ma.us

Audit Department

CPF201dep

cc: Bill Carpenter

Issue #2: Attachment

Carpenter, Bill (15656)			BANK	
10/1/2015	18	\$3,450.00		
			10/2/2015 Deposit	\$3,450.00
			10/5/2015 Google*ADWS	\$0.27
			10/7/2015 Stripe/Transfer	\$242.45
10/15/2015	19	\$1,540.00	10/15/2015 Deposit	\$1,540.00
			10/16/2015 Deposit	\$9,000.00
10/17/2015	20	\$9,000.00		
		Monthly Totals: <u>\$13,990.00</u>		<u>\$14,232.72</u>

Issue #5 Attachment

<u>Date</u>	<u>Contributor</u>	<u>Amount</u>	<u>Occ/Emp</u>
10/2/2015	Andrade, Thomas	\$500.00	Campaign Donation Letter Sent
10/2/2015	Arrighi, Thomas	\$250.00	Campaign Donation Letter Sent
10/17/2015	Bachman, Katharine	\$250.00	Campaign Donation Letter Sent
10/17/2015	Bigby, Kenan	\$500.00	Campaign Donation Letter Sent
10/17/2015	Brahmer, Derika	\$250.00	Campaign Donation Letter Sent
10/17/2015	Carroll, Thomas	\$500.00	Campaign Donation Letter Sent
10/17/2015	Cashman, Jay	\$500.00	Campaign Donation Letter Sent
10/17/2015	Clark, James	\$500.00	Campaign Donation Letter Sent
10/17/2015	Cobbs, James	\$500.00	Campaign Donation Letter Sent
10/2/2015	Cook, Peter	\$750.00	Campaign Donation Letter Sent
10/17/2015	Crothery, Delight	\$250.00	Campaign Donation Letter Sent
10/2/2015	Donahue, Mark	\$500.00	Campaign Donation Letter Sent
10/17/2015	Driscoll, John	\$500.00	Campaign Donation Letter Sent
10/17/2015	Finneran, Donna	\$200.00	Campaign Donation Letter Sent
10/2/2015	Flynn, Peter	\$1,000.00	Campaign Donation Letter Sent
10/17/2015	Gilpin, George	\$300.00	Campaign Donation Letter Sent
10/17/2015	Hajjar, Anne	\$1,000.00	Campaign Donation Letter Sent
10/17/2015	Halliwell, Kendra	\$500.00	

Issue #5 Attachment

10/17/2015	Hill, John	\$500.00	Campaign Donation Letter Sent
10/17/2015	Keefe, James	\$500.00	Campaign Donation Letter Sent
10/15/2015	Kolentsas, John	\$200.00	Campaign Donation Letter Sent
10/17/2015	Lee, Patrick	\$500.00	Campaign Donation Letter Sent
10/17/2015	Ludwig, Nancy	\$1,000.00	Campaign Donation Letter Sent
10/2/2015	Maclean, Mary	\$1,000.00	Campaign Donation Letter Sent
10/2/2015	Mannix, John	\$500.00	Campaign Donation Letter Sent
10/2/2015	Mazzoni, Robert	\$500.00	Investor Self employed
10/17/2015	McLaughlin, James	\$250.00	Campaign Donation Letter Sent
10/2/2015	McManus, Peter	\$250.00	Campaign Donation Letter Sent
10/17/2015	Mcparland, Michael	\$250.00	Campaign Donation Letter Sent
10/2/2015	Morin, Lynne	\$1,000.00	Campaign Donation Letter Sent
10/17/2015	Nolan, Marie	\$250.00	Campaign Donation Letter Sent
10/17/2015	Nunes, Debra	\$250.00	Campaign Donation Letter Sent
10/17/2015	O'mara, Richard	\$250.00	Campaign Donation Letter Sent
10/17/2015	Ratti, Nicholas	\$250.00	Campaign Donation Letter Sent
10/2/2015	Reagan, Glenn	\$200.00	Campaign Donation Letter Sent
10/2/2015	Shields, Carmel	\$500.00	Campaign Donation Letter Sent
10/17/2015	Walker, Ronald	\$250.00	Campaign Donation Letter Sent

Issue #5 Attachment

10/2/2015	Wiseman, Catherine	\$250.00	Campaign Donation Letter Sent
10/17/2015	Zahler, Mathieu	\$250.00	Campaign Donation Letter Sent

Issue #4 Instructions

Clarifying an Expenditure

1. Log in to <http://ocpfreporter.us> using your CPF ID number and password.
2. The "Clarify an Expenditure" page is displayed. The page is divided into two tabs: "Clarify an Expenditure" and "Filters."
3. All of the expenditure items reported by the bank on behalf of the candidate or committee are displayed on the "Clarify an Expenditure" tab. Each item has a "Clarify" button attached to the record.
4. Click on the "Clarify" button for each item to add or edit information for that item. The information from the item record will appear in the data entry fields of the clarification form that appears at the top of the list. You can add or edit the following information: Vendor Name, Street Address, City, State, Zip Code and Purpose.
5. You cannot edit the Date, Check Number or Amount fields. If you believe there is an error in one of these fields, you will need to contact your bank as they will need to amend their report to correct date, check number or amount information for expenditure items.
6. When you have finished adding or editing the information for an expenditure item, click on the "Update" button. This will save your changes to that report item and return it to the list below. If you click the "Cancel" button, the application will remove the item from the clarification form without making any changes to the record.
7. Because all of the candidate's or committee's expenditure items are displayed on the "Clarify an Expenditure" tab, it may be helpful to use the "Filters" tab to locate individual items that you need to clarify. Click on the "Filters" tab to filter records by: Report year and reporting period, Payee Name, Date Range or Amount Range. You can use more than one filter at a time and the filters will stay in place until you clear them.
8. Repeat the actions in steps 4-6 for all of the items indicated in the clarification request from OCPF.
9. When you have finished, it is recommended that you click on the "Log Off" link to exit the system prior to closing your browser.

Note: On the EFS, clarified expenditure items are displayed with both the original vendor and purpose information and the clarified vendor and purpose information provided. An item's inclusion in search results, however, is based upon the clarification information provided.

Issue #5 Instructions

Adding Occupation and Employer Information

1. Please go to Reporter 6 at <http://ocpfreporter.us>.
2. Log in to Reporter 6 using your CPF ID # and assigned password.
2. Click on the "Schedules" button on the toolbar at the top of the page. Select "Deposits & Receipts" from the menu.
3. Click on the "Receipts" tab. You can use the "Name" field to locate the records for the items that need to be edited.
4. Click on the "Edit" button next to the desired contributor record.
5. The information from that contribution record will appear in the "Edit Receipt" window.
6. Fill in the occupation and employer information for the contributor and click on the blue "E-File Changes" button.
7. The record will be updated and e-filed with OCPF.

The information about a contributor's occupation and employer should be as specific as possible. Unless the actual business name is provided in the Employer field, generic terms for an individual's occupation, such as "self-employed," "businessman" or "restaurateur" should be avoided. Likewise, the actual name of an individual's employer should be used. Even if an individual owns his or her own business, the business name should still be used and ownership indicated, rather than use generic terms such as "self-employed." Finally, if an individual does not work outside the home, you should still describe his or her status, such as: "retired," "homemaker," "unemployed" or "student."

Issue #6 Instructions

Date: _____

To: _____

Our committee recently made the following payments to you:

DATE	AMOUNT
_____	_____
_____	_____
_____	_____

Please be advised that the Massachusetts campaign finance law (M.G.L. c. 55, s. 18D) requires the disclosure of any payments made by a vendor to any subvendor if:

- the yearly aggregate paid to the vendor exceeds \$5,000; AND
- the yearly aggregate paid to any subvendor by the original vendor exceeds \$500.

Please provide either the subvendor information for the above-noted payments or a written statement indicating that **NO SUBVENDORS** were used in providing the goods or services purchased.

Thank you for your attention to this matter.

Sincerely,