

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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September 1, 2022

Victoria Danberg
30 Chase Street
Newton, MA 02459

RE: CPF-22-03

Dear Ms. Danberg:

This office has completed its review of your Committee's expenditure activity during your 2021 race for City Council in Newton. Based upon our review, we determined that Committee expenditures that were made outside of the depository bank account did not comply with the campaign finance law.

As a candidate for City Council, you were required to designate a financial institution as your depository bank to file reports under Section 19 of Chapter 55, the Massachusetts campaign finance law. Section 19 specifies that all campaign finance activity must take place through a designated depository account and be disclosed in a timely manner. Additionally, Section 19 requires expenditures to be made by Committee credit/debit card or by using checks drawn directly on a candidate's depository bank account.¹

On November 22, 2021, the Committee made a total of \$7,206.15 in reimbursements to Victoria Danberg for a variety of campaign related expenditures that were made outside the Committee's depository bank account. In addition, the Committee did not file a reimbursement report to disclose the underlying expenditure activity of these payments until April 2022. In accordance with 970 CMR 2.10(7), reimbursement reports are required to be filed within 30 days of the underlying purchase.

Based upon our review, we have determined that the campaign expenditures made outside the depository account did not comply with Section 19 of the campaign finance law. Furthermore, although the activity was subsequently disclosed on a reimbursement report, the activity was not timely disclosed, which frustrated the public's interest in accurate and timely disclosure of all campaign finance activity.

¹ OCPF previously notified the Committee of the requirement to conduct all campaign activity through the designated depository account in a public resolution letter, dated December 27, 2019.

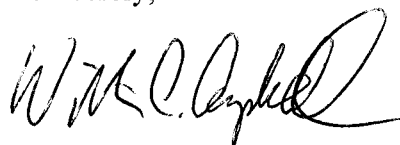


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To resolve this matter, you have agreed to forgive \$5,000 in candidate loans made to your Committee. Additionally, you have personally made a \$2,500 payment to the Commonwealth. We anticipate that the guidance provided as a result of this review will ensure future compliance with the campaign finance law. You should be aware that further instances of noncompliance may result in referral to the Attorney General pursuant to Section 3 of the campaign finance law.

In accordance with the opinion of the Supervisor of Public Records, this letter is a public record. A copy will be placed in the Committee's public file.

Sincerely,

A handwritten signature in black ink, appearing to read "W.C. Campbell", with a large, stylized flourish at the end.

William C. Campbell
Director

WCC/mj

cc: Christopher Samuels, Treasurer