



Office of Campaign and Political Finance  
Attn: William Campbell  
One Ashburton Pl # 411  
Boston, MA 02108

August 23, 2021

Dear Mr. Campbell,

Massachusetts Fiscal Alliance requests a review by the Office of Campaign and Political Finance (OCPF) regarding the appearance of coordination of expenditures and endorsements made by Elizabeth Henry and Casey Bowers, agents for the Environmental League of Massachusetts, Inc. (ELM) an IRS determined 501(c)(3) tax-deductible non-profit organization, Environmental League of Massachusetts Action Fund (ELM ACTION) an IRS determined 501(c)(4) non-profit organization, Environmental League of Massachusetts Action Fund Political Action Committee (ELM PAC) a PAC registered with OCPF, and Environmental League of Massachusetts Action Fund Independent Expenditure Political Action Committee (ELM IE PAC) a Super PAC registered with OCPF. Upon examination of OCPF publicly available records, there is a definite appearance that these agents used these entities as a scheme to coordinate support to benefit the Committee to Elect Michelle Wu (CTE Michelle Wu). The facts and timeline are below.

Elizabeth Henry is the President of ELM, the President of ELM ACTION, and the Treasurer of ELM PAC. Casey Bowers is the Assistant Vice President for government relations for ELM, the Legislative Director for ELM ACTION, and the Treasurer for ELM IE PAC.

On July 1, 2021, Casey Bowers replaced Elizabeth Henry as Treasurer of ELM IE PAC. On July 8, 2021, Elizabeth Henry replaced Casey Bowers as Treasurer of the ELM PAC. On July 14, ELM PAC contributed \$500 to CTE Michelle Wu, ELM PAC's first and only contribution to the CTE Michelle Wu. On July 26, 2021, Elizabeth Henry contributed a maximum personal contribution (as a registered lobbyist of \$200) to CTE Michelle Wu, Henry's first and only contribution to the CTE Michelle Wu.

According to OCPF records, on August 6, 2021, ELM ACTION made a \$50,000 contribution to the ELM IE PAC, the largest contribution ELM IE PAC has ever received. On August 11, 2021, ELM IE PAC made an independent expenditure in support for the CTE Michelle Wu for \$46,882.01. The next day, on August 12, 2021, ELM<sup>1</sup> and ELM ACTION<sup>2</sup> endorsed Michelle Wu for Mayor of Boston.

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<sup>1</sup> <https://medium.com/@EnviroLeagueMA/boston-needs-a-mayor-who-leads-on-climate-michelle-wu-f714baeb73a>

<sup>2</sup> <https://www.facebook.com/EnvironmentalLeagueOfMassachusetts/>

Elizabeth Henry and Casey Bowers work for ELM, which endorsed Michelle Wu for Mayor. Elizabeth Henry and Casey Bowers also work for ELM ACTION, which also endorsed Michelle Wu for Mayor. ELM ACTION donated directly to ELM IE PAC which made an independent expenditure to support CTE Michelle Wu. Elizabeth Henry is an officer of ELM PAC and used the PAC to support the CTE Michelle Wu. Casey Bowers is an officer of ELM IE PAC and used the Super PAC to support the CTE Michelle Wu.

On June 2, 2021, OCPF provided a public advisory opinion for how 501(c)(4) non-profit organizations and independent expenditure committees (Super PACs) can avoid coordination. Based on the timeline and facts mentioned above, it appears these agents may have violated OCPF rules regarding coordination. As concerned taxpayers of Massachusetts, we urge OCPF to further examine this complaint. Thank you.

Sincerely,



Paul Diego Craney  
Spokesperson  
Massachusetts Fiscal Alliance