

# STATE OF RHODE ISLAND BOARD OF ELECTIONS

CAMPAIGN FINANCE AUDIT

MOIRA JAYNE WALSH

**CAMPAIGN FINANCE AUDIT**



Audit Conducted By: Richard E. Thornton, Director of Campaign Finance

**STATE OF RHODE ISLAND**  
**BOARD OF ELECTIONS**

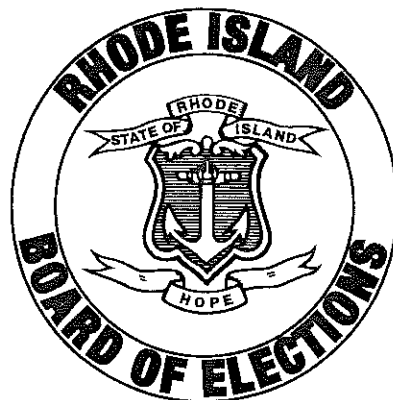
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# Moira Jayne Walsh

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# **Moira Jayne Walsh**

## **INTRODUCTION**

### **Audit Authority**

Pursuant to Rhode Island General Law §17-25-5(a)(8), the Board of Elections is authorized to perform any duties that are necessary to implement the provisions of Chapter 25 of Title 17. Without limiting the generality of this provision, the Board is authorized and empowered to: Conduct compliance reviews and audits of campaign accounts as necessary, and in a manner consistent with the provisions of Chapter 25, Title 17.

### **Audit Purpose**

Campaign Finance audits assist the Board of Elections with enforcement of campaign finance laws, provides a tool to evaluate the effectiveness of those laws and the campaign finance reporting process, verifies the accuracy and propriety of campaign finance receipts and validity and legality of campaign finance expenses and helps provide timely and accurate information to the public.

Campaign Finance audits assist and encourage candidate compliance with campaign finance reporting laws and promotes candidate accountability and integrity.

# Moira Jayne Walsh

**Scope:** Review campaign finance reports and supporting documentation for the period January 1, 2019 through June 30, 2021.

**Methodology:** Review Contributions:

- Compare contributions received to bank statement deposits
- Compare contributions received to contributions reported on campaign finance reports
- Verify there are no prohibited contributions
- Verify contributions do not exceed aggregate annual limit

Review Expenditures:

- Compare expenditures made to bank statement checks/debits
- Compare expenditures made to expenditures reported on campaign finance reports
- Verify there are no prohibited uses of campaign funds
- Verify campaign expenditures are valid and legal.

**History:** In August 2021, the Board of Elections (“Board”) initiated an audit of the campaign account of Moira Jayne Walsh (“Walsh”) pursuant to R.I.G.L. §17-25-5(a), due to Walsh’s failure to submit a copy of her 2019 and 2020 campaign bank account statements pursuant to R.I.G.L. §17-25-11(c)(2) and failure to file three (3) campaign finance reports, required pursuant to R.I.G.L. §17-25-11(c)(1).

On September 13, 2021, the Board received via subpoena served upon the bank of Walsh’s campaign account, campaign depository account bank statements, bank deposits, and checks/money orders deposited into and checks written from the account, for the period January 1, 2019 through June 30, 2021.

**Findings:** The following are Findings of campaign finance violations discovered during the Audit Review of Walsh’s campaign account and supporting documentation:

# Moira Jayne Walsh

## Contributions:

- \$249.47 in contributions or receipts were not disclosed on a campaign finance report in violation of R.I.G.L. §17-25-11.
- A \$100.00 contribution was reported received from the wrong PAC

## Expenditures:

- \$445.39 in campaign expenditures, representing seventeen (17) transactions, were not disclosed on a campaign finance report in violation of R.I.G.L. §17-25-11.
- \$1,056.60 in campaign expenditures, representing three (3) transactions, were reported identifying the wrong payee.

**Summary:** The Audit Review of Walsh's campaign account and supporting documentation for the period January 1, 2019 through June 30, 2021 demonstrates:

- With limited exception, all campaign contributions received were properly and accurately disclosed.
- A total of seventeen (17) expenditures were not reported on campaign finance reports.
- A total of three (3) expenditures were reported with the wrong payee on campaign finance reports.
- A total of three (3) campaign finance reports were not filed.
- Copies of the 2019 and 2020 campaign bank account statements were not submitted by Walsh.

## Auditee Response:

- Walsh acknowledged the reporting mistakes and omissions and apologized for not complying with her campaign finance responsibilities.

## Action:

Consent Order (to follow)

State of Rhode Island  
Board of Elections

21 OCT 18 AM 11: 53

CONSENT ORDER

In Re: Moira Jayne Walsh

Moira Jayne Walsh ("Walsh") hereby agrees to the entry of this Order and to each term and condition set forth herein:

1. At all times relevant hereto, Walsh has been subject to the reporting requirements set forth in Title 17, Chapter 25 of the General Laws, pertaining to campaign contributions and expenditures.
2. In August 2021, the Board of Elections ("Board") initiated an audit of the campaign account of Walsh due to Walsh's failure to submit a copy of her 2019 and 2020 campaign bank account statements in violation of R.I.G.L. §17-25-11(c)(2) and failure to file three (3) campaign finance reports in violation of R.I.G.L. §17-25-11(c)(1).
3. The Board conducted a full review of campaign finance reports, supporting documentation and bank records obtained via subpoena to verify the accuracy and propriety of campaign receipts and expenditures. The review determined the following:
  - With limited exception, all campaign contributions received were properly and accurately disclosed.
  - A total of seventeen (17) expenditures were not reported on campaign finance reports.
  - A total of three (3) expenditures were reported with the wrong payee on campaign finance reports.
  - Copies of the 2019 and 2020 campaign bank account statements were not submitted by Walsh.
4. Walsh hereby acknowledges that she violated several provisions of Title 17, Chapter 25; and authorized the Board to complete her campaign finance reporting and dissolved her account.
5. Walsh hereby waives her right to any further hearing before the Board, and her right to bring any legal challenge before any state or federal court and expressly

consents to a finding by the Board that her actions, as more fully described above, violate the reporting and compliance requirements of Title 17, Chapter 25.

6. Walsh further consents to the entry of this Order and the imposition of a fine by the Board pursuant to R.I.G.L. §17-25-13(b), in the amount of \$750.00 to be paid personally by her; for violations of Title 17, Chapter 25.
7. Walsh hereby agrees to make the following payment of fine to the Board:
  - 1) \$750.00 fine to be paid personally by Moira Jayne Walsh within one hundred eighty (180) days of the date the Consent Order is so entered.
8. Walsh agrees to make the payment described above on or before the Due Date. In the event Walsh fails to make the payment by the corresponding Due Date, the Board shall notify Walsh both by U.S. Mail First Class and electronically at the residence and email address set forth below ("Delinquency Notice"). Walsh shall be afforded ten (10) calendar days from the date of the Delinquency Notice to make the overdue payment. In the event the aforesaid payment is not made within the ten (10) day notice period, Walsh agrees that the fine shall increase to \$1,500.00 which shall immediately become due and payable to the Board and that the Board shall refer the unpaid debt to the Department of Revenue-Central Collections Unit for collection. Walsh consents to the personal jurisdiction and entry of this Order as a final judgment and waives any and all defenses that he may have to its enforcement.

The fines contained herein relate only to the violations identified in this Order and do not cover any violations not listed.

I, Moira Jayne Walsh, agree to each and every term set forth above and further agree to the entry of this Order.

Moira J. Walsh  
Moira Jayne Walsh

10/13/21  
Date

So entered this 13 day of October, 2021.

Diane C. Mederos  
Diane Mederos, Chairwoman

2nd day of November, 2021.