



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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September 4, 2018

Debra Mullen, Treasurer  
Brockton Democratic City Committee  
45 Gladwood Street  
Brockton, MA 02301

Dear Ms. Mullen:

This office has completed its routine analysis of the 2016-2017 campaign finance reports filed by the Brockton Democratic City Committee ("BDCC"). Based on our review, which included an analysis of bank records and a reconciliation of campaign finance reports to the BDCC's bank statements, we have concluded that the BDCC's reported activity was inconsistent with M.G.L. c. 55, the Massachusetts campaign finance law.

Section 18 requires complete and accurate disclosure of all contributions. OCPF's review determined that the BDCC's reports did not accurately disclose all receipts for 2017. Specifically, the BDCC did not disclose, on its campaign finance reports, an approximate total of \$900 in contributions received and deposited into the BDCC's account.

Additionally, our review found that the BDCC's reports reflected two receipts from a federal political committee. Specifically, on August 26, 2016, the BDCC received a \$150 contribution and on August 28, 2017, it received another \$150 contribution from the Lynch for Congress Committee, a candidate's committee registered with the Federal Election Commission. The campaign finance law prohibits any Massachusetts local party committee from receiving funds from a federal political committee not registered in Massachusetts. See M.G.L. c. 55, §7 and IB-82-01. Therefore, the Committee may not accept funds from this federal committee.

To resolve this matter, the BDCC, with OCPF's assistance, has now amended its campaign finance report to reflect, as accurately as possible, its 2017 activity. In addition, the BDCC has purged the \$300 received from the Lynch for Congress Committee by making a donation in that amount to a charity. Finally, the BDCC has also agreed that going forward when filing its campaign finance reports it will itemize all of its transactions. Because remedial action has been taken and because we believe the guidance provided in this letter will ensure future compliance with the campaign finance law, OCPF has determined that this matter may now be closed.



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In accordance with a ruling by the Supervisor of Public Records, this letter and all related correspondence is a matter of public record. As such, it will be placed in the Committee's public file. If you have any questions regarding this or any other campaign finance matter do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a large, looping initial "M".

Michael J. Sullivan  
Director