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October 8, 2021

Representative Michelle DuBois  
The Committee to Elect Michelle DuBois  
6 Banks Street  
Brockton, MA 02302

Re: CPF-21-49

Dear Representative DuBois:

This office has completed its routine analysis of the DuBois Committee's (the "Committee's") campaign finance reports for 2020. As a result of this review, we have concluded that the Committee violated multiple provisions of M.G.L. c. 55, the Massachusetts campaign finance law.

1. Inaccurate Disclosure of Contributor Information

The campaign finance law requires political committees to file timely campaign finance reports that accurately reflect financial activity. See M.G.L. c. 55, §§ 18 and 19. During the course of its review, OCPF concluded that the Committee's deposit reports failed to accurately disclose contributor information for bank-reported deposits made in August 2020. As a result, several contributions were misattributed: some contributions were inaccurately attributed to traditional political action committees or an independent expenditure political action committee instead of to their respective affiliated unions, while other contributions were attributed to the wrong political committees entirely.

After numerous letters, phone calls, and emails from OCPF staff, the Committee e-filed amendments to its deposit reports, to accurately disclose the contributor information for each of the identified contributions. Although the deposit reports for August 2020 are now correct, the failure to provide accurate disclosure, in a timely fashion, frustrated the goals of the campaign finance law and violated M.G.L. c. 55, §§ 18 and 19.

2. Excess Contribution

OCPF has previously, and on multiple occasions, notified your Committee of its obligation to purge an excess contribution received in 2020 from the Boston Carmen's Union PAC (the "PAC"). The Committee deposited two contributions of \$300 each from the PAC, one on February 21, 2020 and another on July 6, 2020, for total annual contributions from the PAC of \$600. This exceeds the \$500 annual PAC-to-candidate contribution limit. M.G.L. c. 55, § 6.

To resolve this outstanding issue, the Committee has now purged the excess contribution, in the total amount of \$100, by writing a Committee check payable to the Commonwealth of Massachusetts. If necessary, the purpose information for the payment to the Commonwealth, as reflected in the Committee's bank report, should be appended to disclose that the expenditure was to "purge excess 2020 contribution from Boston Carmen's Union PAC."

The Committee's inaccurate disclosure of contributor information and receipt of an excess PAC contribution did not comply 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.

Sincerely,



William C. Campbell  
Director

WCC/mc

cc: Adam Swinson, Treasurer  
DuBois Committee