



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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May 3, 2017

Representative Michelle DuBois
6 Banks Street
Brockton, MA 02302

RE: CPF-17-29

Dear Representative DuBois:

This office has completed its review of issues raised in a complaint that we received relating to the Committee to Elect Michelle DuBois' (the Committee's) use of PayPal to process credit card contributions.

OCPF's regulations require that a political committee that solicits contributions using PayPal must request occupation and employer information from contributors giving \$200 or more in a year before directing the contributors to the PayPal site. In addition, the website must require contributors to certify, with an affirmative action, that they are responsible for making payments on the credit card and that the contributor's personal funds will be the true source of the contributions. See 970 CMR 1.09 and OCPF M-04-01.

The complainant alleged that the Committee's website allowed contributors to make contributions through PayPal without complying with these requirements.

Based on our review, we determined that the Committee's PayPal account did contain a request for occupation and employer information. This was consistent with the regulation. The Committee's PayPal account did not, however, require contributors to affirmatively certify, as required by 970 CMR 1.09(2)(b)2, "that the contributor is responsible for paying all charges incurred in using the credit or debit card to make the contribution and that the contributor's personal funds will be the true source of the contribution."

In response to OCPF's review, you stated that the Committee e-mailed the persons who had contributed via PayPal to ask the contributors to provide the certification (or alternatively, to indicate if they wanted a refund). As of May 2, 2017, the Committee has not informed OCPF that they have received positive affirmation letters for any of the 7 contributors. To the extent the Committee does not receive affirmative replies for the contributions and forward a copy of such replies to OCPF by May 19, 2017, those contributions must be refunded or purged to the Commonwealth.



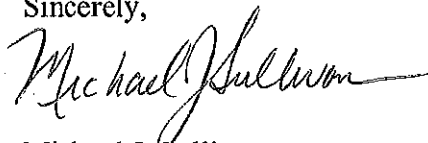
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In accordance with the opinion of the Supervisor of Public Records this letter is a public record. If you have any questions regarding this letter or any other campaign finance matter, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Sullivan". The signature is written in black ink and is positioned above the printed name and title.

Michael J. Sullivan
Director

MJS/sh