



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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August 20, 2019

Plymouth County Democratic League PAC
c/o Brian Dunn, Treasurer
761 Randolph Street
Abington, MA 02351

Re: CPF-19-72

Dear Mr. Dunn:

This office has completed its review of the Plymouth County Democratic League Political Action Committee's (the "Committee") campaign finance reports for the period December 2018 through April 2019. As a result of this analysis, we have concluded that the Committee violated M.G.L. c. 55, the Massachusetts campaign finance law.¹

The campaign finance law requires political committees to file timely campaign finance reports that accurately reflect the committee's financial activity. All political committees must maintain records of all contributions received and expenditures made, including the name and residential address of any individual who makes a contribution to the committee, regardless of amount, and the vendor and purpose for all expenditures made. M.G.L. c. 55, §§ 2 and 5. Depository committees must disclose all contributor information in deposit reports, due by the 5th and 20th of each month. M.G.L. c. 55, § 19; 970 CMR 1.11(6). Committees must also disclose the purpose of all expenditures over \$50. M.G.L. c. 55, §§ 18 and 19.

Between December 16, 2018, and April 15, 2019, the Committee failed to file deposit reports for at least 20 deposits, totaling more than \$6,000. In addition, during that same period, the Committee made 17 expenditures, totaling approximately \$3,800, for which either insufficient or no purpose or vendor information was provided. When the Committee eventually filed the required deposit reports, it did not have contributor information for two cash contributions totaling \$40. As a result, OCPF has determined that the Committee violated the campaign finance law.

Although the Committee's former treasurer, Chris Matthews ("Matthews"), did not initially respond to OCPF's audit letters, he ultimately met with OCPF representatives in June to review the requirements of the campaign finance law relating to deposit reports and clarification of expenditures. Following that meeting, Matthews filed the missing deposit reports and provided additional expenditure information where necessary. The Committee then filed paperwork with

¹ OCPF recognizes that the activity referenced in this letter predates your appointment as treasurer of the Committee, which was not filed with our office until August 9, 2019. This letter is being sent to you in your capacity as the current treasurer of record for the Committee.



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OCPF to change its treasurer of record and made a payment to the Commonwealth, in the amount of \$40, to purge the contributions for which it had no contributor information.

Therefore, because the Committee has taken appropriate remedial actions, and because we expect that the guidance provided by this letter will ensure future compliance with the campaign finance law, OCPF has determined that no further action is warranted at this time. You should be aware, however, that further instances of noncompliance with the campaign finance law will result in referral of the Treasurer and the Committee to the Attorney General in accordance with Section 3 of the campaign finance law.

In accordance with an opinion from the Supervisor of Public Records, this letter is a public record. If you have any questions regarding this matter or on any issues of future compliance with the campaign finance law, please contact the office.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Sullivan". The signature is written in a cursive style with a long horizontal flourish at the end.

Michael J. Sullivan
Director

MJS/mc

cc: Chris Matthews