

OCPF Reports



From the Director

Mike Sullivan

Reporter 7

Our IT department, which is set to release the seventh version of *Reporter*, our on-line filing system, deserves credit for their innovation.

It's easy for a government agency to create something that works, which *Reporter 6* did very well, and then let it become stagnant.

Our philosophy is to continue to improve and grow in the technology department. Our IT team, led by Al Grimes, is always looking for ways to make our data easier to view and file.

If you're organized with OCPF, please continue to check your e-mail for more information about *Reporter 7*. It will be launched in December.

1A Auto vs. Director of OCPF

A lawsuit filed in 2015 challenged a portion of the campaign finance law that prohibits corporations and other businesses from making contributions to candidates, parties and PACs.

The case was finally decided in September by the Supreme Judi-

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Please see page 5 for a notice about state campaign finance regulations.

REPORTER 7 LAUNCH WILL MAKE E-FILING EASIER

New e-filing system will kick off before the end of the year

The seventh version of *Reporter*, the OCPF filing system that was created in 1995, will be launched before the end of the year.

The new version, *Reporter 7*, operates under the same basic concept of data entry and e-filing, but has a much different appearance.

Reporter 7 is easier to use and will minimize common mistakes for candidates and committees, according to OCPF IT Director Al Grimes.

"Over the past few years, we've listened to feedback and concerns from users of *Reporter 6*. Based on this feedback, we've made a number of changes that will hopefully streamline filing reports with OCPF," Grimes said. "We think *Reporter 7* will provide a simplified way to file reports

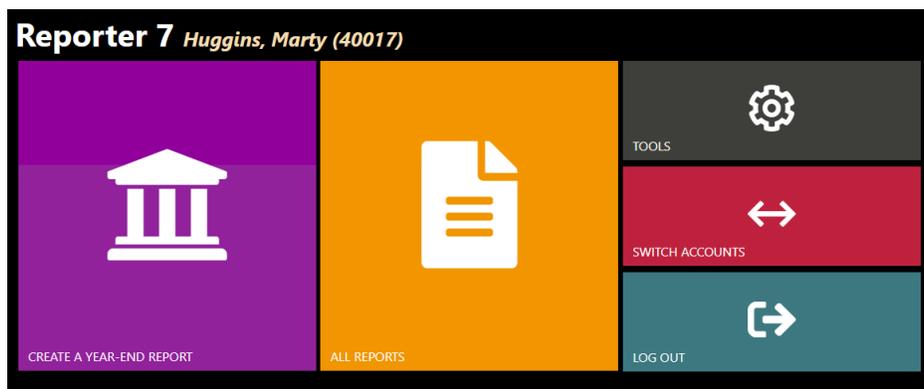
for users. We're looking forward to launching it."

Candidates and committees do not need to do anything extra for access to *Reporter 7*. When a candidate or committee logs into the system after the launch date, he or she will be automatically directed to *Reporter 7*. All data from *Reporter 6* will be there.

Please [click here](#) for images of *Reporter 7*.

Reporter 7 is web-based and free.

Please call OCPF with questions about how to use *Reporter 7*. Instructional videos on how to use *Reporter 7* will be available on OCPF's YouTube channel, OCPFReports, when the program is launched.



This is the new homepage for *Reporter 7* (non-depository account).

Continued: From the Director

cial Court, which ruled that the corporate ban was not unconstitutional.

[Click here](#) for the SJC's decision, and see below for a more thorough explanation.

2018 Election

Congratulations to all the winners this year.

We appreciate everyone who filed their campaign finance reports on time (95 percent did so for the pre-election report).

Please remember that a year-end report is due Jan. 22, 2019, even if you were unsuccessful in 2018.

Have a great fall.

Mike Sullivan

Court affirms constitutionality of corporate contribution ban

The state's Supreme Judicial Court decided in September that the Massachusetts campaign finance law's ban on corporate contributions to candidates and other committees is not unconstitutional.

The decision, [available here](#), was unanimous.

The lawsuit (1A Auto Inc. vs. Director of OCPF) was originally filed in 2015 by the Goldwater Institute, a Phoenix-based organization, on behalf of two Massachusetts corporations.

The complaint alleged that the state's campaign finance law, which prohibits contributions to candidates by business corporations and other business entities, infringes on the free-speech rights of businesses and puts corporations at a disadvantage.

Unions are permitted to contribute.

The state's ban on direct corporation contributions to candidates dates to 1907.

Unlike a similar federal law, however, the state law does not prohibit contributions by unions.

In 1986, OCPF ruled that unions and other organizations that don't have corporate money in their general treasuries, may make total contributions to candidates and parties of \$15,000 or 10 percent of a general fund, whichever is less.

The ruling is codified in OCPF's Interpretive Bulletin, [IB-88-01](#).

"Both history and common sense have demonstrated that, when corporations make contributions to political candidates, there is a risk of corruption, both actual and perceived."

Supreme Judicial Court Decision in 1A Auto Inc. vs. Director of OCPF

Recent Cases & Rulings



OCPF audits all campaign finance reports and reviews all complaints alleging violations of the campaign finance law. These audits and reviews may result in enforcement actions or rulings (below). The identity of any complainant is kept confidential. Disposition agreements are matters of public record once cases are concluded.

OCPF does not comment on any matter under review, nor does the office confirm or deny that it has received a specific complaint. The identity of any complainant is kept confidential. Public resolution letters and disposition agreements are matters of public record once cases are concluded.

Disposition Agreements

A disposition agreement is a voluntary written agreement entered into between the subject of a review and OCPF, in which the subject agrees to take certain specific actions.

Company vice president makes \$30,000 payment to the state to resolve personal campaign finance issues

Chelmsford resident Michael Lupoli, a vice president of Double N Inc., personally made a \$30,000 payment to the state’s general fund to resolve issues concerning disguising the true source of campaign contributions, according to a disposition agreement between OCPF and Lupoli.

Lupoli provided a total of \$12,900 to two Double N Inc. employees, who then donated the funds in their names to 12 candidates and a legal defense fund committee, according to the agreement.

The campaign finance law prohibits disguising the true origin of a contribution to a candidate or committee.

According to the disposition agreement, Lupoli arranged for two employees, William Burnett and Nicholas Rera, to make the contributions from 2015-2017.

Based on a review of bank records and other information, OCPF learned that Rera and Burnett deposited funds received from Lupoli into their personal checking accounts either shortly before or shortly after they made contributions to candidates and the legal defense fund.

OCPF has no reason to believe that the candidates had knowledge that the contributions by Burnett and Rera were made with funds provided by Lupoli. The 13 committees have or will disgorge the prohibited contributions to the state’s general fund, a municipality, charity or a scholarship fund.

The disposition agreement, [available here](#), was signed by OCPF Director Michael Sullivan and Lupoli.

Public Resolution Letters

A **public resolution letter** may be issued in instances where the office found “no reason to believe” a violation occurred; where “no further action” or investigation is warranted; or where a subject “did not comply” with the law but, in OCPF’s view, the case is able to be settled in an informal fashion with an educational letter or a requirement that some corrective action be taken. A public resolution letter does not necessarily imply a wrongdoing on the part of a subject and does not require agreement by a subject.

CPF-18-35: Taxwise Topsfield. Did not comply (reporting); 6/13/2018. Taxwise Topsfield organized as a PAC with the town clerk but did not file year-end or pre-election reports in a timely manner.

CPF-18-51: Benjamin Herrington, Amherst. Did not comply (excess contribution); 6/18/2018. The Herrington committee received an excess contribution of \$385 from the Vira Douangmany Committee. Contributions from one candidate committee to another candidate committee are limited to \$100 per calendar year. The Herrington Committee refunded \$385 to the Douangmany Committee.

CPF-17-143: John Stefanini, Framingham. Did not comply (corporate contribution); 6/18/2018. The committee received a prohibited in-kind business contribution in the form of office space from Kenwood Organization, Inc. To resolve the matter, the owners of Kenwood paid personal funds to the corporation as in-kind contributions to the Stefanini Committee.

CPF-18-63: Mashpee School Department. Did not comply (public resources); 6/18/2018. Mashpee School Superintendent Patricia DeBoer used her government e-mail to send a message to families and staff that endorsed two candidates for School Committee.

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Continued: Recent Cases & Rulings

The campaign finance law prohibits the use of public resources for political purposes.

CPF-18-30: Damali Vidot, Chelsea. Did not comply (reporting); 6/20/2018. The Vidot Committee did not initially report at least \$1,341 during a campaign for Chelsea City Council in 2016 and 2017, and received \$180 in cash contributions without keeping records. Some of the cash was received at a raffle, and political committees may not hold raffles. To resolve the issues, the committee amended its campaign finance reports and the candidate agreed to forgive \$1,000 in loans that were made personally to the committee.

CPF-18-12: A Better Cambridge, Inc.: Did not comply (disclosure); 7/13/2018. A Better Cambridge, a non-profit group, was acting as a PAC when it solicited, received and expended funds for the purpose of influencing the 2017 Cambridge city election. Once notified of this issue by OCPF, the group filed the necessary forms and disclosed its activity. To resolve the issues, A Better Cambridge made a payment to charity of \$740, and a payment of \$740 to the state’s general fund.

CPF-18-58: Paul Meehan, Easton. No further action (disclosure); 8/23/2018. A complaint alleged that signs were purchased and displayed for Meehan’s municipal campaign but were not disclosed on campaign finance reports. OCPF determined that the candidate did not personally pay for the signs. The individual who paid for the signs was required to file a municipal report of independent expenditures, which was filed in July. The report should have been filed in January.

CPF-18-58: David Howe, North Easton. Did not comply (reporting); 8/23/2018. Howe, a municipal candidate who withdrew from his race, spent \$17,837 personally for signs, clothing and water bottles in 2017, but did not disclose the activity until July of 2018.

CPF-18-73: John Barrett, Winthrop public employee. Did not comply (public employee); 8/28/2018. Barrett, the chief building inspector for the Town of Winthrop, solicited and received contributions for the Brian Arrigo Committee. Public employees are prohibited from soliciting or receiving contributions.

CPF-18-81: Brockton Democratic City Committee. Did not comply (reporting); 9/4/2018. OCPF’s review of the committee’s bank records determined that the committee did not disclose \$900 in receipts for 2017, and accepted two prohibited receipts totaling \$300 from a federal committee. The committee has amended its reports and made a donation to charity for \$300.

CPF-18-59: Friends of Jasiel F. Correia II Legal Defense Fund. Did not comply (disclosure); 10/9/2018. The legal defense fund did not disclose three donations totaling \$16,000 in its April 2018 donation report. To resolve the matter, the fund amended the donation report to accurately reflect the donations received.

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Advance Notice of Proposed Rulemaking

OCPF Regulations on the Applicability of the Campaign Finance Law to Groups that do not Engage in Political Fundraising, but Do Make Expenditures or Contributions

I. Description of proposed change to regulations, and why change is needed

The campaign finance law defines “political committees” to include any “organization or other group of persons... which receives contributions or makes expenditures for the purpose of influencing the nomination or election of a candidate, or candidates...”. Under this definition, as literally applied, a union or nonprofit organization that makes even a nominal political contribution would be considered a political committee subject to the limits, and registration and reporting requirements, of the campaign finance law. In 1988, the Office of Campaign and Political Finance (OCPF) issued Interpretive Bulletin IB-88-01, in which the office stated that an organization that does not solicit or receive funds for a political purpose will only be considered a political committee if it makes “more than incidental” political expenditures, defined as contributions and expenditures made to benefit or oppose candidates “exceed[ing], in the aggregate, .. either \$15,000 or 10 percent of [the] organization’s gross revenues..., whichever is less.”

On September 6, 2018, in 1A Auto, Inc. v. Director of the Office of Campaign and Political Finance, SJC-12413, the Massachusetts Supreme Judicial Court issued a decision upholding the constitutionality of M.G.L. c. 55, § 8, which prohibits direct contributions to candidates from business corporations. IB-88-01 was mentioned in the briefs submitted by the plaintiff and discussed in an *amicus* brief submitted to the Court. The Court did not address the accuracy of OCPF’s interpretation, and noted that consideration of IB-88-01 was not necessary to its decision. The Court, however, observed that the bulletin may “not carry the force of law” because the interpretation has not benefited from the full rulemaking process. 1A Auto, fn. 10.

In light of the Court’s statement, and a Request for Rulemaking received by this office from Common Cause Massachusetts on November 7, 2018, OCPF believes it is important to provide an opportunity for comment and hearing on regulations to better define the appropriate standard for determining when an entity should be considered a “political committee” for purposes of Section 1.

II. Request for comments and timeline

Interested persons are invited to appear in person at a public hearing, or to submit written comment to OCPF at any time, in accordance with the following schedule. Written comment may be submitted in person, or by US Mail, fax or email.

- A. Initial comments on whether the Interpretive Bulletin should be codified or if it should be replaced with a different standard, with comments including proposed alternative approaches, to be received by November 30, 2018.
- B. Initial public hearing to be held on December 6, 2018
- C. Initial draft regulations to be completed by OCPF and available by February 1, 2019
- D. Public hearing on draft regulations to be held on March 5, 2019
- E. Comments on draft regulations to be received by March 15, 2019
- F. Final regulations to be available by May 1, 2019

The hearings will be held at 2:00 p.m. at One Ashburton Place, 21st floor, in Boston.

Office of Campaign and Political Finance
One Ashburton Place, Room 411, Boston, MA 02108

E-mail: ocpf@cpf.state.ma.us

Fax: (617) 727-6549

Political Action Committee Spending in the 2018 Election

Activity: Jan. 1 through Oct. 31

Political Action Committees and People’s Committees reported spending \$3,336,952 during the first 10 months of 2018, and raising \$4,269,449 during the same period.

Of the 254 PACs, seven reported spending more than \$100,000, and eight reported raising more than \$100,000.

The 1199 SEIU MA PAC topped the spending list with \$428,576 in expenditures, followed by the MA & Northern NE Laborers’ District Council PAC with \$288,586 in spending.

Political action committees are formed

to support or oppose candidates, and may contribute up to \$500 per year to candidates.

Individuals can contribute a maximum of \$500 to a PAC per calendar year (corporations, LLCs, LLPs and partnerships are prohibited from contributing to PACs).

People’s committees are PACs that only take contributions of up to \$172 per year from individuals (in 2018), and can make \$500 contributions to candidates.

[Click here](#) to view the complete list of PACs and their totals.

TOP 10 PACS BY EXPENDITURES

	Receipts	Expenditures
1. 1199 SEIU MA PAC	\$751,545	\$428,576
2. MA & Northern NE Laborers’ PAC	\$595,238	\$288,586
3. Retired Public Employees PAC	\$349,568	\$285,399
4. Committee for a Dem. House	\$217,837	\$215,066
5. Electrical Workers, Local 103 PAC	\$170,192	\$151,869
6. Pipefitters Local #537 PAC	\$89,668	\$121,304
7. Chapter 25 (Teamsters) PAC	\$69,593	\$109,840
8. Mass. Dental Society PAC	\$45,606	\$92,764
9. Ironworkers Union Local 7 PAC	\$130,281	\$92,094
10. Electrical Workers Local 2222 PAC	\$84,602	\$72,795

NOTE: Some PAC names are abbreviated.

PUBLIC FINANCE

Nearly \$1.1 million in public funds was distributed to statewide candidates in the 2018 state election.

The sole source of funding for the program is the State Election Campaign Fund, which is funded by taxpayers who direct \$1 of their tax liability on their annual income tax returns.

Total public financing funds distributed in 2018

Jay Gonzalez* pre-primary total:	\$302,564
Robert Massie* pre-primary total:	\$164,842
Gonzalez & Palfrey** pre-election total:	\$626,332
2018 Total:	\$1,093,738

*Democratic gubernatorial candidate

**Gov./Lt Gov. Team

[Click here for a public finance program overview.](#)

\$CREDIT CARD VENDORS\$

FAQ: Can I use XYZ Company to collect on-line contributions by credit or debit card?

ANSWER: OCPF does not prohibit the use of any vendor, so long as the political committee is able to collect the required information at the time the donation is made. The required information:

1. Name of the donor.
2. Residential address of the donor.
3. Occupation and employer of the donor, if the contribution is \$200 or more.
4. The donor affirms that the money he or she is contributing is their own, and not funds from another person or entity (this is usually done by checking a 'yes' box).

[Click here for OCPF's guide on collecting contributions via credit card.](#)

Independent Expenditure PACs reported \$6.9 million in expenditures in 2018 (Jan. 1 to Nov. 6)

Independent expenditure PACs, also known as Super PACs, reported spending \$6,923,710 from Jan. 1 to election day.

A vast majority of the funds, \$6,169,740, were spent by the Commonwealth Future IEPAC to support incumbent Gov. Charles Baker. The second highest total, \$479,717, was reported by the Patients for Affordable Drugs Action IEPAC, also to support Baker.

IEPACs are groups that raise money for the purpose of making independent expenditures.

Independent expenditures are advertisements or communications that expressly support or oppose candidates without coordinating with candidates or parties. IEPACs can raise unlimited amounts of money.

[Click here](#) to view IEPAC reports.

[In the last statewide election](#) in 2014, IEPACs and other groups reported \$20.4 million in independent expenditures.

IEPAC	SPENT
Commonwealth Future	\$6,169,740
Patients for Affordable Drugs Action	\$479,717
Mass. Realtor	\$165,150
Democrats for Education Reform	\$35,680
Mass. Teachers Association	\$30,681
Environmental League of Massachusetts Action Fund	\$27,172
Jobs First	\$10,647
Priorities for Progress	\$4,922
FirstLight Power Resources	\$682

LOCAL ELECTION OFFICIALS: Who can file the M 102-O form?

Answer here 



Hint: It's for local candidates who don't raise or spend money

OCPF REGULATIONS

EARMARKED CONTRIBUTIONS ARE PROHIBITED

(14) **Earmarked Contributions.** Other than when a candidate contributes to the candidate's own political committee, once a person contributes to a political committee, the person does not retain control over the funds. A person may not make a contribution to a political committee on the condition or with the agreement or understanding that the funds or a substantial portion of the funds contributed must subsequently be contributed by that committee to any other committee.

Can a donor " earmark " contributions? Generally, no. [Click here](#) for a 60-second explanation.

PAYROLL SERVICES ARE NOW ALLOWED

Depository committees may now use automated data payroll services to pay employees, due to changes in OCPF's electronic filing system that allow for accurate disclosure of payroll expenditures.

[Click here](#) for the OCPF memo.

SOCIAL MEDIA

and MGL Ch. 55

PERMITTED

Individuals may post opinions about candidates and campaigns, and may also fundraise (except for public employees). Social media is generally exempt from campaign finance limitations or disclosure requirements.

Social media posts by candidates and committees who are using their personal accounts are not disclosed or prohibited.

Organizations, entities and groups can freely endorse candidates and committees on social media.

Disclaimers are not required on social media posts.

Appointed and compensated public employees may like, share or retweet political social media posts, but cannot share fundraising posts.

EXPLAINED

Social media is free and not something of value that rises to the level of an in-kind contribution. Appointed public employees may not solicit or receive contributions on social media.

Candidates and committees may freely discuss issues and fundraise on social media. However, candidates shouldn't fundraise for PACs.

A group that raises money to support or oppose candidates must form a Political Action Committee.

Some communications require disclaimers (MGL Ch. 55, Sec. 18G), but not social media posts (even paid social media posts).

The campaign finance law prohibits public employees from soliciting contributions directly or indirectly. The prohibition includes sharing social media posts that solicit funds. Elected officials are exempt.

LEGISLATIVE CANDIDATES

House & Senate candidates report \$11.4 million in expenditures from Jan. 1 to Oct. 19

House and Senate candidates reported spending \$11.4 million in the nine and a half months leading up to the 2018 general election.

The 375 candidates also reported \$12.6 million in receipts during the period (Jan. 1 to Oct. 19).

Candidates must now file a year-end report, disclosing activity from Oct. 20 to Dec. 31. The year-end report is due Jan. 22, 2019.

The year-end report will include the fundraising and spending figures for the 18 days prior to the Nov. 6 election.

Legislative candidate spending totals are similar to previous state election years. In 2016, candidates reported \$12.2 million in expenditures. The figure was \$12.4 million in 2014.

The Senate candidate with the highest expenditure total in 2018 from Jan. 1 to Oct. 19 was Barry Finegold of Andover, with \$303,951. Finegold won his election.

The state representative candidate with the highest expenditure total was Rep. Jeffrey Sanchez of Boston, with \$352,857 in expenditures. Sanchez lost his election in the primary.

[Click here](#) for the complete list.

TOP 15 EXPENDITURE TOTALS BY LEGISLATIVE CANDIDATES

Candidate	Receipts	Expenditures
1. Jeffrey Sanchez, Jamaica Plain, House (I)	\$280,022	\$352,857
2. Barry Finegold, Andover, Senate	\$409,114	\$303,951
3. Robert DeLeo, Winthrop, House (I)	\$439,783	\$283,961
4. Julian Andre Cyr, Truro, Senate (I)	\$236,921	\$223,141
5. Nicholas Collins, S. Boston, Senate (I)*	\$64,456	\$197,496
6. Jason Lewis, Winchester, Senate (I)	\$82,299	\$172,936
7. Karen Spilka, Ashland, Senate (I)	\$245,478	\$164,422
8. Margaret Woolley Busse, Acton, Senate	\$91,952	\$147,226
9. Denise Garlick, Needham, House (I)	\$99,136	\$129,775
10. Nika Carlene Elugardo, Jamaica Plain, House	\$121,419	\$126,821
11. Joanne Comerford, Florence, Senate	\$138,087	\$126,651
12. Michelle Ciccolo, Lexington, House	\$80,363	\$119,463
13. James Welch, W. Springfield, Senate (I)	\$90,782	\$115,456
14. Tram Nguyen, Andover, House	\$162,588	\$112,167
15. Rebecca Lynne Rausch, Needham, Senate	\$100,638	\$108,857

*Does not include special election activity from Jan. 1 to May 21.

Statewide Candidates 2018

A total of 21 statewide candidates in 2018 reported receipts of \$12,540,889 and expenditures of \$21,086,450 from Jan. 1 until Oct. 31.

The race with the most activity was the gubernatorial contest between Republican Gov. Charles Baker and Democratic challenger Jay Gonzalez.

Baker reported \$8,863,080 in expenditures in his winning effort, more than five times the \$1,677,832 reported by Gonzalez.

[Click here](#) to view the statewide candidate tracker.

OCPF will publish a comprehensive study on statewide candidate spending and fundraising covering 2017 and 2018. The study will be released in 2019.

For candidates and committees organized with OCPF, **year-end reports** are due Jan. 22.

On the local level, year-end reports are filed by all incumbents, as well as candidates with activity, a balance or liabilities.

January							2019
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
		1	2	3	4	5	
6	7	8	9	10	11	12	
13	14	15	16	17	18	19	
20	21	22	23	24	25	26	
27	28	29	30	31			

The [60 Seconds with OCPF](#) video series provides quick answers to common campaign finance questions



OCPF answers campaign finance questions every day. Here are a few of the questions, with our answers.

Someone is hosting a fundraising party of less than 20 people at their home for a candidate. There will be some food and drinks. How is this reported?

If it's an ordinary amount of food that a host would provide to any visitors to his house for a social gathering, then there's no reporting requirement. If it's more than ordinary, it would be reported as an in-kind contribution.

Does a candidate's campaign mailer need to say "paid for by"?

It's not a campaign finance law requirement. However, residents have called us to complain when a "paid for by" statement is not present, so it would be a good idea to include it.

If a Political Action Committee endorses a candidate on its social media page, did it make an in-kind contribution to the candidate?

Generally, no. Social media posts are not considered contributions.

Can a school committee vote to support a ballot question, such as a debt exclusion for a new school?

An official body may vote to endorse a question, but unsolicited distributions of information about the question is prohibited.

OCPF has launched a new version of its database search table. The new search table includes greater sorting features, and the ability to search for more data, such as subvendor expenditures and donations to legal defense funds. [Click here](#) to use the improved search table.

The Campaign Finance Law & Businesses

A general summary of the impact of the campaign finance law on businesses

The state's campaign finance law (MGL Chapter 55, Section 8) prohibits contributions, both monetary and in-kind, from **corporations, LLCs, LLPs and partnerships** to all candidates and political committees, except to ballot question committees and independent expenditure PACs.

Monetary Contributions

Candidates and political committees should not solicit or deposit checks from corporations, LLCs, LLPs and partnerships. If a check from one of these entities is erroneously deposited, the committee should immediately refund the total amount.

Collecting contributions via an internet vendor requires donors to affirm, usually through a check-off box, that they are giving their own personal funds. OCPF strongly recommends that contributors also acknowledge that they are not using corporate, LLC, LLP and partnership funds.

Ballot question committees and independent expenditure PACs, also known as Super PACs, may accept unlimited monetary contributions from corporations, LLCs, LLPs or partnerships.

Prohibited In-Kind Contributions

General Rule: Candidates and committees are required to pay the market rate for the goods and services provided by corporations, LLCs, LLPs and partnerships.

For example, a restaurant organized as an LLC cannot provide food and a function room to a campaign without charge or with a discount that is not available to the general public. That would result in a prohibited in-kind contribution. In another example, an LLP with an open storefront may rent space to a candidate, but only if the candidate pays market value.

If goods and services are provided to ballot question committees or independent expenditure PACs, a business can offer a discount or charge nothing. In those cases, committees would report in-kind contributions from the businesses.

Candidate "Meet and Greet" at a Business

Exception: Corporations, LLCs, LLPs and partnerships may invite a candidate to their place of business to speak with owners, partners and employees. The candidate may accept contributions from individuals at the event, and businesses may provide a reasonable amount of food or refreshments.

For example, a small technology company organized as a corporation invites a candidate to its offices. The candidate speaks with a group of employees in the company conference room, where coffee and pastries are served. The employees in the room contribute personal checks to the candidate before she leaves. The campaign finance law does not prohibit this sort of meeting, and the candidate is not required to report a prohibited in-kind contribution from the company for space, food and drinks.

Businesses that are not corporations, LLCs, LLPs or partnerships

A business that is not a corporation, LLC, LLP or partnership, such as a sole proprietorship, may make a contribution to a candidate or committee.

A sole proprietorship contribution is attributed to the single owner of the business, for example: "Nick Squires, doing business as Squires Consulting." To determine whether a business is incorporated, please contact the Secretary of the Commonwealth's [Corporations Division](http://www.sec.state.ma.us/cor/) (www.sec.state.ma.us/cor/).