## Massachusetts Office of Campaign and Political Finance

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## Three PACs resolve excess contribution issue

Three affiliated political action committees and their representatives agreed to pay \$17,500 to the state's general fund to resolve excess contribution issues, according to a disposition agreement between OCPF and the PACs.

The three PACs are the Massachusetts Republican Municipal Coalition PAC (MRMC), the Massachusetts Independent PAC for Working Families (MIPAC) and the Catholic Citizenship PAC (CCPAC). The PACs were organized with OCPF by three individuals but operated as "affiliated committees" under the direction of a single person, Chanel Prunier of Shrewsbury, according to the agreement. Prunier was chair of the MRMC PAC.

The campaign finance law and OCPF's regulations prohibit affiliated PACs, which are defined as two or more PACs that are established, financed, maintained or controlled by any person. Affiliated PACs, if not prohibited, would allow a single person to operate two or more PACs to make excess contributions to candidates.

OCPF's analysis resulted in a list of more than 25 instances where a candidate received contributions from two or three of the above PACs that exceeded the \$500 limit in 2012. In total, the PACs made approximately \$24,000 in excess contributions.

Based on a review of political committee records and interviews with several committee officers, OCPF concluded that Prunier had significant influence in determining which candidate committees the PACs would support. She also drafted or provided input into fundraising letters for the three PACs and there were numerous instances where contributions to individual candidates were made on the same day and in the same amount by more than one of the PACs.

According to the disposition agreement, the \$17,500 payment to the state's general fund was made collectively by the three PACs, Prunier and Robert Bradley, chair of the MIPAC.

The MIPAC and the CCPAC will dissolve with OCPF, but the MRMC PAC will remain open, according to the agreement.

Also, Prunier has agreed to have no future involvement with any other PAC, other than the MRMC PAC.

The MRMC PAC will not make any contributions prior to January, 2017, to candidates who received contributions from the three PACs in 2012, according to the agreement. The PAC will also file additional campaign finance reports with OCPF through July, 2016.

A copy of the disposition agreement is **available here**. It was signed by the PAC representatives and OCPF Director Michael J. Sullivan. 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.

OCPF is an independent state agency that administers the state's campaign finance law, which provides for disclosure and regulation of campaign finance activity by candidates and political committees.



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