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Volume 1

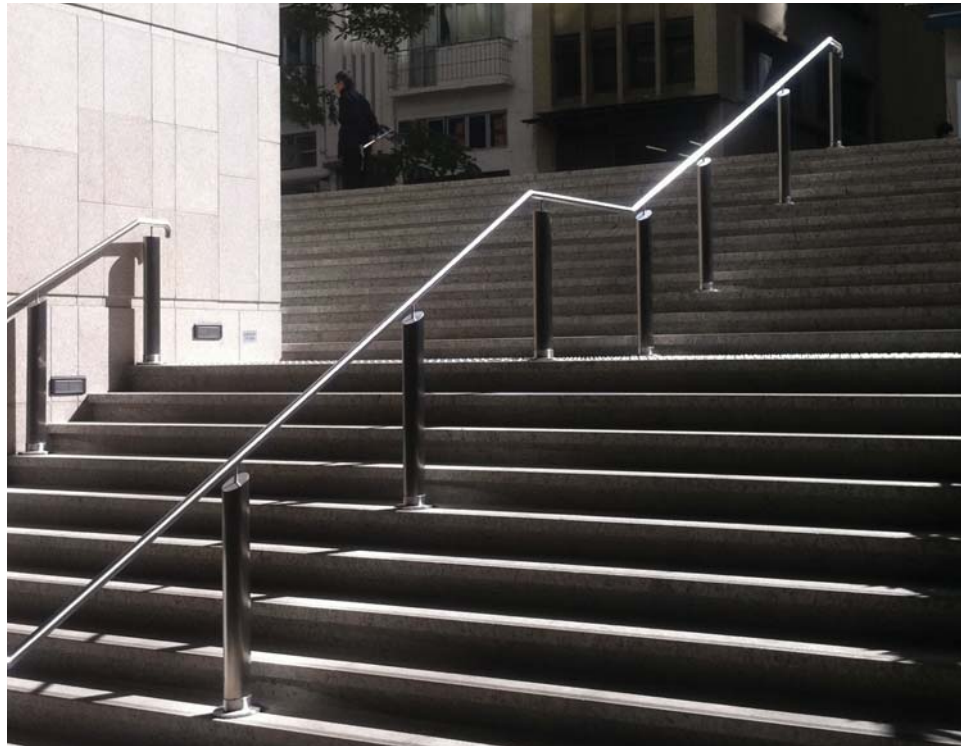


# Newsletter

Kicking off a New Year and a New Election Cycle.

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## Happy 10th Anniversary, CEP!

On December 7, 2005, Governor M. Jodi Rell signed into law Public Act 2005-5 which, even after 10 years, is the most comprehensive public campaign finance program in the United States.

The Citizens' Election Program (CEP) is a voluntary public campaign financing program that was designed to encourage citizen participation and limit the role of special interest money in the State of Connecticut's political process.

The Commission is looking forward to another successful campaign cycle with the Citizens' Election Program in 2016!

## Municipal Filing Pilot Program

On June 30, 2015, the Governor signed Special Act 15-14 into law which permits the State Elections Enforcement Commission to establish a pilot program that would allow up to 20 municipalities to transfer some or all of their filing repository duties to the Commission for the 2017 election cycle.

Commission staff has recently invited interested municipalities to apply to the program and plans to make the final selection of participants in March 2016.

The response from town and city clerks was overwhelmingly positive and the Commission looks forward to working closely with these local officials.

For participating towns, this means that all candidates, candidate committees, and political committees that normally file with the town clerk's office will register and file disclosure statements with the Commission. All of their paperwork will then be available for public viewing on the Commission's website.

If the program is successful, the Commission is hopeful it will become the filing repository of all 169 municipalities in the state.

If any town clerks have questions on the program, please contact Elections Officer Lisa Nightingale at 860-256-2985 or [lisa.nightingale@ct.gov](mailto:lisa.nightingale@ct.gov).



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## Staff Spotlights

Here are the latest updates on the State Elections Enforcement Commission staff members:

Due to the six vacancies that occurred in 2014, the Commission welcomed the following staff members in 2015:  
Sarah Clark – Elections Officer  
Douglas Frost – IT Manager  
Richard Gebo – Elections Officer  
Ergys Guni – Accounting Careers Trainee  
Shauna Khang – Fiscal/Administrative Officer  
Amit Shah – Accounting Careers Trainee

May 2015 marked the valiant return of Lisa Nightingale, completing the 5-person team of Elections Officers. The Commission and staff offer Lisa their sincere congratulations on the new addition to her family.

Andrew Cascudo, Elections Officer, graduated from UConn Law School and has become a member of the Connecticut bar! Congratulations to Andrew on his accomplishments!

This Spring, Staff Attorney Patrick Lamb was named the chief union steward for the Connecticut Administrative and Residual Union. He is currently on assignment full-time at A&R. The Commission and staff thank Patrick for many years of hard work and extend their best wishes to him in this new endeavor.

Our Office Assistant, Mary Vitola, has resigned from her post to assist with a family business. The Commission thanks her for her service and hopes to fill her vacancy soon.

## Wrapping up the 2015 Municipal Campaign

November 2015 has come and gone and now committees are looking to make the necessary moves to close up shop.

The Commission staff offers some specific pieces of advice for treasurers, which includes:

- \* reviewing all expenditures incurred or obligated to be made, and following up with the vendors or service providers to make sure the committee pays all outstanding payments before terminating and closing the bank account;
- \* keeping contact information for all election day workers and making sure they promptly deposit compensation checks; and
- \* tracking all outstanding committee checks and urging vendors to cash these promptly.

### Distributing Surplus Funds

Prior to termination, a committee must pay all outstanding debts, distribute equipment and distribute all surplus funds remaining in their bank accounts to either:

1. an ongoing political committee which has not been established to finance future political campaigns of the candidate;
2. a party committee;
3. all contributors on a pro rata basis by contribution;
4. a charitable organization under Section 501(c)(3) of the Internal Revenue Code;
5. a veterans' organization under Section 501(c)(19) of the Internal Revenue Code; or
6. the Citizens' Election Fund.

### Terminating the Committee

A committee must complete the following before it may terminate:

1. pay all expenses previously incurred but not yet paid;
2. sell equipment purchased by the committee (or distributed, if applicable);
3. distribute surplus funds (if any) according to the law; and
4. eliminate deficit (if any) according to the law.



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Once a committee has distributed its surplus, it has seven days to file its termination statement. The deadline for a committee to distribute its surplus is March 31, 2016 and the deadline to file the termination statement with the town clerk is April 7, 2016. The committee also has the option to terminate with its January 10 filing if it has a zero balance.

### Keeping Records

The treasurer must keep copies of all committee records, including internal records and documents to substantiate receipts and expenditures made or incurred, for four years after the date the committee files its final disclosure statement.

Prior to termination, the treasurer should obtain copies of all checks written by the committee as well as all checks received as contributions and keep those copies in the committee records.

The cost to obtain copies is a permissible campaign expenditure.

If the candidate prefers to keep these records instead of the treasurer, she may obtain them from him and assume this recordkeeping responsibility.

Contact Commission staff with any questions about recordkeeping.



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## January 10th Filing - Are you ready?

As 2015 comes to a close, all open committees must file their final report of the year.

All ongoing committees – specifically, party committees and political committees registered for ongoing purposes – **must file a long form SEEC Form 20** for this last report.

The filing period for the January quarterly filing commences January 1, 2016 and ends January 11, 2016 (because January 10 is a Sunday).

Paper filers – please keep in mind that the Commission cannot receive your filing before the filing period commences (i.e., prior to January 1) and must receive your filing by 5:00 pm on

January 11, 2016. eCRIS filers have until 11:59 pm on January 11, 2016 to submit their filings.

Paper filers should also keep in mind a disclosure statement filed with the Commission must, at a minimum, be signed and dated under penalty of false statement by the treasurer or deputy treasurer (if applicable), cover the appropriate time period, and be on the proper SEEC form. The Commission is no longer able to accept a treasurer's printed spreadsheets in lieu of any section of the SEEC form. If a statement does not meet these requirements, it will be posted for the public's view but will not be deemed a sufficient filing and will result in penalties for non-filing if not corrected by the filing deadline.

If you have any questions as you prepare your January 10th filing, please call the State Elections Enforcement Commission at 860-256-2940.

## Quick Contacts:

SEEC Main Line:	860-256-2940	seec@ct.gov
SEEC Candidate Services:	860-256-2985	public.finance@ct.gov
SEEC Compliance Unit:	860-256-2925	seec.compliance@ct.gov
eCRIS Help Desk:	860-256-2930	seec.ecris.info@ct.gov

SEEC Website:	ct.gov/seec
eCRIS Home Page:	seec.ct.gov/ecris





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## Filing is Easier with eCRIS

Treasurers have utilized the electronic Campaign Reporting Information System (eCRIS) for years to help them maintain their records and streamline their reporting process.

All committees registered with the Commission are eligible to file via eCRIS.

eCRIS enables you to:

- \* file on time, saving either the cost of postage or the drive to Hartford with a one-click step to submitting your filings to the Commission;
- \* file completely with helpful checkpoints;
- \* track donors' aggregate contributions; and
- \* store donor and vendor addresses and information for future filings.

In the past year, the Commission has seen the percentage of ongoing committees filing by eCRIS rise from 67% to 77%. And during the last state election cycle, 90% of candidate committees opted to be eCRIS filers. Using eCRIS not only benefits treasurers but the State – it costs the agency over forty dollars per paper filing to have them data entered so they can

be searchable on eCRIS as required by state statute.

We can get you set up so your January filing will provide you with a solid, complete and accurate start to your electronic filing process.

Need training? We are here to help you.

Contact Elections Officer Sarah Clark at 860-256-2964 or [sarah.r.clark@ct.gov](mailto:sarah.r.clark@ct.gov) for further assistance.

Stay tuned to the SEEC website ([ct.gov/seec](http://ct.gov/seec)) for our webinar videos to assist you in getting started with eCRIS!

## Pre-Application Review (PAR) available to CEP Candidates

For candidates planning to participate in the Citizens' Election Program, the Commission is offering four opportunities to submit documentation for a pre-application review (PAR) of potential qualifying contributions. This is a great opportunity for campaigns, especially first-time CEP participating committees, as the Commission has seen that this early review program greatly increases the likelihood that campaigns will avoid continuances during the grant application process.

Candidate committees that file electronically via eCRIS and have collected 50 or more contributions are eligible to take advantage of this program.

Documentation can be submitted during the following timeframes:

- \* January 1-11, 2016
- \* March 1-10, 2016
- \* April 1-11, 2016
- \* May 1-10, 2016

If you have any questions about this process, please contact the Candidate Services Unit at 860-256-2985.

Please note that exploratory committees are not eligible for this program, but their contributions will be reviewed by Commission staff when they transition to candidate committee.

## COGEL Conference

Staff members participated in the 2015 Council on Governmental Ethics Laws (COGEL) Conference this past December.

Executive Director Michael Brandi served as the moderator for a panel discussion on dark money, Legal Program Director Shannon Kief moderated a panel discussion on transparency, Attorney Kevin Ahern served as a panelist for a discussion on preparing cases and preserving evidence, and Attorney Joshua Foley led a table discussion on forming an enforcement process.

This was an educational experience for all who attended!

## Hot Topics: Secondary Payee Disclosure

Following each election cycle, the Commission staff performs post-election reviews in order to identify common problems, discern areas of confusion, improve our training and outreach materials, and recommend legislative changes, if applicable.



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### Online Contributions

If you are setting up an online contribution page for your campaign or committee's website, please contact Commission staff to review your website before it goes live to make sure it captures the relevant information and complies with campaign finance law.

The best practice is to model your online contribution page after the sample online contribution forms provided on the Commission's website.

Here are instructions on how you can find these sample forms:

- \* Go to the SEEC website: [ct.gov/seec](http://ct.gov/seec)
- \* Click on the link "Forms" in the menu across the top of the page
- \* Click on the link for "Contributor Certification Forms"
- \* Select the form which applies to your committee
- \* Share this form with your Merchant Account Provider so he or she can use it as a template for developing your online donation page.

Please contact the Candidate Services Unit at 860-256-2985 for further assistance.

The 2014 election cycle revealed a dramatic increase of "campaign-in-a-box" consultants. These kinds of consultants essentially substitute for campaign managers, identifying vendors (known as "secondary payees" in campaign finance terms) to provide goods and services for the committee. These secondary payees are required to be disclosed by the treasurer.

In terms of reporting, the committee treasurer discloses the payment to the consultant as an expense (Section N of SEEC Form 30 / Section P of SEEC Form 20). Then, if the consultant has paid other vendors, persons, or entities for committee-related expenses, the treasurer must disclose who he has paid and for what in a separate section of the form, "Itemization of Reimbursements and Secondary Payees" (Section R of SEEC Form 30) / Section T of SEEC Form 20).

Please keep in mind that all consultants hired by a committee and paid over \$100 for their services are required to sign contracts before any work or services are performed, and must also provide contemporaneous invoices setting forth the nature and detail of the work actually performed for the committee. The treasurer should ensure that the contract requires the

consultant to provide the treasurer with invoices containing sufficient secondary payee information so that he may timely file the reports required of him by law.

**Example:** The Sam for Senate candidate committee contracted with Campaign in a Box, LLC for consulting services, paying the company \$95,000 to provide general campaign strategy and to put together all outreach efforts. In July, the committee paid Campaign in a Box \$20,000. During that month, Campaign in a Box, LLC prepared the content of a mailer and radio ad and then paid \$5,000 to Political Advertising Warehouse for the mailer and \$2,000 to WXYZ Radio for the radio ad. The Sam for Senate candidate committee must report the \$20,000 payment to Campaign in a Box, LLC in Section N of SEEC Form 30 and the secondary payments of \$5,000 to Political Advertising Warehouse and \$2,000 to WXYZ Radio as separate entries in Section R of SEEC Form 30.



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