

**STATE OF CONNECTICUT**  
**STATE ELECTIONS ENFORCEMENT COMMISSION**

In the Matter of a Complaint by Pauline Moon  
Wethersfield

File No. 2021-170

**FINDINGS AND CONCLUSIONS**

Complainant Pauline Moon of Wethersfield filed this complaint pursuant to General Statutes § 9-7b, alleging that candidate Patrick Pentalow and his campaign manager Tyler Flanigan had violated Connecticut's campaign finance statutes when Flanigan gave a contribution of \$2,500 to the Wethersfield Republican Town Committee. After its investigation, the Commission makes the following findings and conclusions:

1. Complainant Moon made two allegations in her complaint. First, she alleged that the Wethersfield Republican Town Committee had failed accurately to report changes in the committee's account balance when the committee filed a report on October 10, 2020. Second, she alleged that Flanigan had improperly transferred a payment that he received from his work as campaign manager on the Pentalow campaign to the Wethersfield Republican Town Committee.
2. In response to the first allegation, the Commission added Amanda Drew, the treasurer of the Wethersfield Republican Town Committee, as a respondent to this matter.
3. Drew became treasurer of the Wethersfield Republican Town Committee upon the death of the prior treasurer, S. Bradley Milvae, who died on August 11, 2020.
4. According to an affidavit provided by Drew, upon the prior treasurer's death it became apparent that many of the receipts, bank statements, and financial documentation that were appurtenant to the operation of the town committee were unavailable. Town committee officers looked through Milvae's house but were unable to locate all of the documents related to the expenditures by the committee.
5. After she was named as the treasurer, Drew stated, she attempted to reconcile the bank records with the filings. In the October 10<sup>th</sup> filing for 2020, the first for which she served as treasurer, she used the committee's account balance derived from the bank statements as the starting balance.
6. The Commission issued a subpoena to Webster Bank for the Wethersfield Republican Town Committee's bank statements for the period between January 1, 2017 through September 20, 2021.

7. After receiving the bank statements from Webster Bank, Commission audit staff reviewed the bank records. Starting from 2017 thru October 2020, auditors discovered \$9,349.92 in expenses on the bank statements that were not reported on the periodic campaign finance disclosure filings that were filed on behalf of the town committee. Approximately \$432 of that amount was for overdraft fees charged by the bank. In addition, auditors found approximately, \$1,721.60 in expenditures that were reported on the filings that were not reflected in the committee's bank statements.
8. While the reporting that the prior WRTC treasurer completed was not accurate, based on the information provided by the bank statements, Commission staff was able to determine that there the expenditures were likely for campaign-related activities. The majority of the errors were also attributable to the prior treasurer, who, as stated earlier, died in 2020.
9. Drew stated that when she became treasurer she was unable to reconcile the committee's accounts. She used the balance reflected in the Committee's bank statements as a starting point.
10. The committee's reporting during the relevant period does not satisfy the requirements of Connecticut's general statutes, but, given the extenuating circumstances and the fact that the prior treasurer has died, the Commission will take no further action on this matter.
11. The complainant also made a second allegation, namely that Flanigan made an impermissible contribution to the Wethersfield Republican Town Committee.
12. Specifically, Flanigan was paid \$2,500 on or about September 4, 2020 for his service as campaign manager to the *Pentalow for Wethersfield* candidate committee. On or about September 30, 2020, Flanigan contributed \$2,000 to the Wethersfield Republican Town Committee.
13. Complainant alleged that this contribution was impermissible.
14. The maximum an individual may contribute annually to a party committee is \$2,000.
15. The Complainant alleged that the \$2,000 that Flanigan contributed to the Wethersfield Republican Town Committee on September 30, 2020 was the only contribution Flanigan made to the WRTC in 2020. The Commission finds that this is true and that Mr. Flanigan also made an monetary and in-kind contribution to the same town committee in 2019 amounting to \$416. Between 2018 and 2022, Mr. Flanigan has also given to six other party and political committees as well as to numerous candidate committees.

16. In addition to the monies earned as campaign manager for the Pentalow campaign in 2020, Flanigan also earned consulting fees and wages from five other candidate committees amounting to approximately \$15,000. Three of the payments from other committees, amounting to \$4375, were made between the September 4 payment by the Pentalow campaign and the September 30 contribution to the Wethersfield Republican Town Committee.
17. The Commission found nothing in the circumstances of the contribution that violated Connecticut's campaign finance laws.

## ORDER

The following Order is recommended on the basis of the aforementioned finding:

That the Commission take no further action on this matter.

Adopted this 16<sup>th</sup> day of Nov. 2022, at Hartford, Connecticut.



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Stephen Penny, Chairman  
By Order of the Commission