

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

In the Matter of a Complaint by David Fuller,  
Stratford

File No. 2014-172B

**AGREEMENT CONTAINING CONSENT ORDER**

This agreement by and between Terry Masters of the Town of Stratford, County of Fairfield, State of Connecticut (hereinafter "Respondent") and the undersigned authorized representative of the State Elections Enforcement Commission is entered into in accordance with § 9-7b-54 of the Regulations of Connecticut State Agencies and § 4-177 (c) of the General Statutes of Connecticut. In accordance herewith, the parties agree that:

1. Complainant alleged that the group "ForStratford" raised and spent funds for local ballot initiatives and on the constitutional amendment question that appeared on the November 4, 2014 ballot and failed to file a registration statement and financial disclosure statements as required by General Statutes § 9-602 and §9-605, respectively.
2. Further, Complainant alleged that *ForStratford* violated General Statutes § 9-621 by failing to provide an attribution on materials that advocated a "yes" vote for the aforementioned constitutional amendment question.
3. In a companion case, Commission File No. 2014-172, the allegations pertaining to General Statutes § 9-602 and § 9-605 were dismissed against *ForStratford* and its agents by the Commission at its June 16, 2015 monthly Commission meeting, as expenditure limits had not been reached to trigger filing requirements. This agreement therefore is limited to the allegation pertaining to General Statutes § 9-621.
4. General Statutes § 9-621, provides in pertinent part:

...

(c) *No* business entity, organization, association, committee, or *group of two or more individuals* who have joined solely to promote the success or defeat of a referendum question *shall make or incur any expenditure for any written, typed or other printed communication* which promotes the success or defeat of any referendum question *unless such communication bears upon its*

*face, as a disclaimer, the words “paid for by” and the following:  
... (4) in the case of such a group of two or more individuals, the  
name of the group and the name and address of its agent.*  
[Emphasis added.]

5. By way of background, Respondent registered *ForStratford* under Section 527 of the Internal Revenue Code as a non-profit organization. Further, the Commission finds that *ForStratford* made expenditures in support of the constitutional amendment question pertaining to absentee ballot laws that appeared on the November 4, 2014 ballot.
6. The Commission finds, and Respondent admits, that *ForStratford* made an expenditure in the amount \$95.72 to advocate for the passage of a “yes” vote on the constitutional amendment question that appeared on the November 4, 2014 ballot at the statewide election.
7. The Commission further finds that *ForStratford* disseminated a printed communication in the form of an email that included the following:

*You can let your neighbors know about Question One on the ballot. That’s the proposed constitutional amendment that would allow the legislature to bring our voting into the 21st Century. About 2/3 of the states have some type of expanded voting hours or access to absentee ballots. Isn’t it time we look at these options, too?* [Original emphasis.]
8. The *ForStratford* email communication contained the following disclaimer: *Copyright © 2014 ForStratford, All rights reserved. You are receiving this email because you are a friend of the author of this email.*
9. Additionally, upon investigation, the Commission finds that *ForStratford* produced a palm card that advocated a “yes” vote for the constitutional amendment question that appeared on the November 4, 2014 ballot.

10. The Commission finds that the palm card communication, as referenced above, contained the followings disclaimer at the bottom: *For Stratford is a political action committee and is not affiliated with any party or candidates. Contributions or gifts to For Stratford are not tax deductible as charitable contributions.*
11. The Commission finds that *ForStratford* made printed communications prior to the November 4, 2014 election that advocated for a constitutional question, but did *not* include the words “paid for by” or identify the name and address of its agent as required by General Statutes § 9-621 (c).
12. The Commission concludes therefore that Respondent violated General Statutes § 9-621 (c) by failing to: (1) include the words “paid for by” and (2) identify the name and address of the agent of *ForStratford*, on printed materials that advocated for a constitutional question at the November 4, 2014 statewide election.
13. The Respondent admits all jurisdictional facts and agrees that this Agreement and Order shall have the same force and effect as a final decision and order entered into after a full hearing and shall become final when adopted by the Commission.
14. The Respondent waives:
  - a. Any further procedural steps;
  - b. The requirement that the Commission’s decision contain a statement of findings of fact and conclusions of law, separately stated; and
  - c. All rights to seek judicial review or otherwise to challenge or to contest the validity of the Order entered into pursuant to this Agreement.
15. Upon the Respondent’s agreement to comply with the Order hereinafter stated, the Commission shall not initiate any further proceedings against the Respondent.
16. It is understood and agreed by the parties to this Agreement that the Commission will consider this Agreement at its next available meeting and, if the Commission rejects it, the Agreement will be withdrawn and may not be used as an admission by either Party in any subsequent hearing, if one becomes necessary.

**ORDER**

IT IS HEREBY ORDERED THAT the Respondent shall henceforth strictly comply with General Statutes § 9-621.

The Respondent:

For the State of Connecticut

BY:



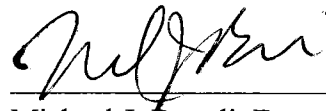
Terry Masters

~~855 Wilcoxson Avenue~~ 530 60 4<sup>th</sup> St  
~~Stratford, Connecticut~~ Walingford CT 06488

Dated:

6/1/16

BY:



Michael J. Brandi, Esq.

Executive Director and General Counsel and  
Authorized Representative of the  
State Elections Enforcement Commission  
20 Trinity Street, Suite 101  
Hartford, Connecticut

Dated:

6/8/16

Adopted this 15<sup>th</sup> day of June, 2016 at Hartford, Connecticut



Anthony J. Castagno, Chairman

By Order of the Commission

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JUN 08 2016

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