



STATE OF CONNECTICUT  
STATE ELECTIONS ENFORCEMENT COMMISSION

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MINUTES

STATE ELECTIONS ENFORCEMENT COMMISSION  
QUARTERLY IN-PERSON MEETING

Additional Methods to Attend This Meeting Include:

For public access please click: Stream on Youtube (<https://youtube.com/@ctseec>)

Stream on Facebook (<https://www.facebook.com/ctseec/live>)

October 8, 2025 9:30 A.M.

Conference Room 1008

**I. Call to Order**

Commissioner Penny was present and called the meeting to order at 9:37 A.M. Commissioners Shannon Bergquist, Sonia Asare and Greg Picuch were present. Agency staff was also present.

**II. Administrative Reports**

**1. Report of Interim Executive Director on Commission Operations and Future Efforts of the State Elections Enforcement Commission**

Interim Executive Director and General Counsel, Clare Kindall, reported to the Commission activities of the agency for the past six months and a recommendation of future efforts for the next year for the State Elections Enforcement Commission. A copy of said report is attached to the minutes.

**III. New Business**

*No new business was presented.*

**IV. Adjournment**

It was moved by Commissioner Picuch and seconded by Commissioner Asare to adjourn the meeting at 10:43 A.M. So voted by a vote of 4-0-0.

Sheri-Lyn Lagueux  
Clerk of the State Elections Enforcement Commission

**November 5, 2025**

Date approved

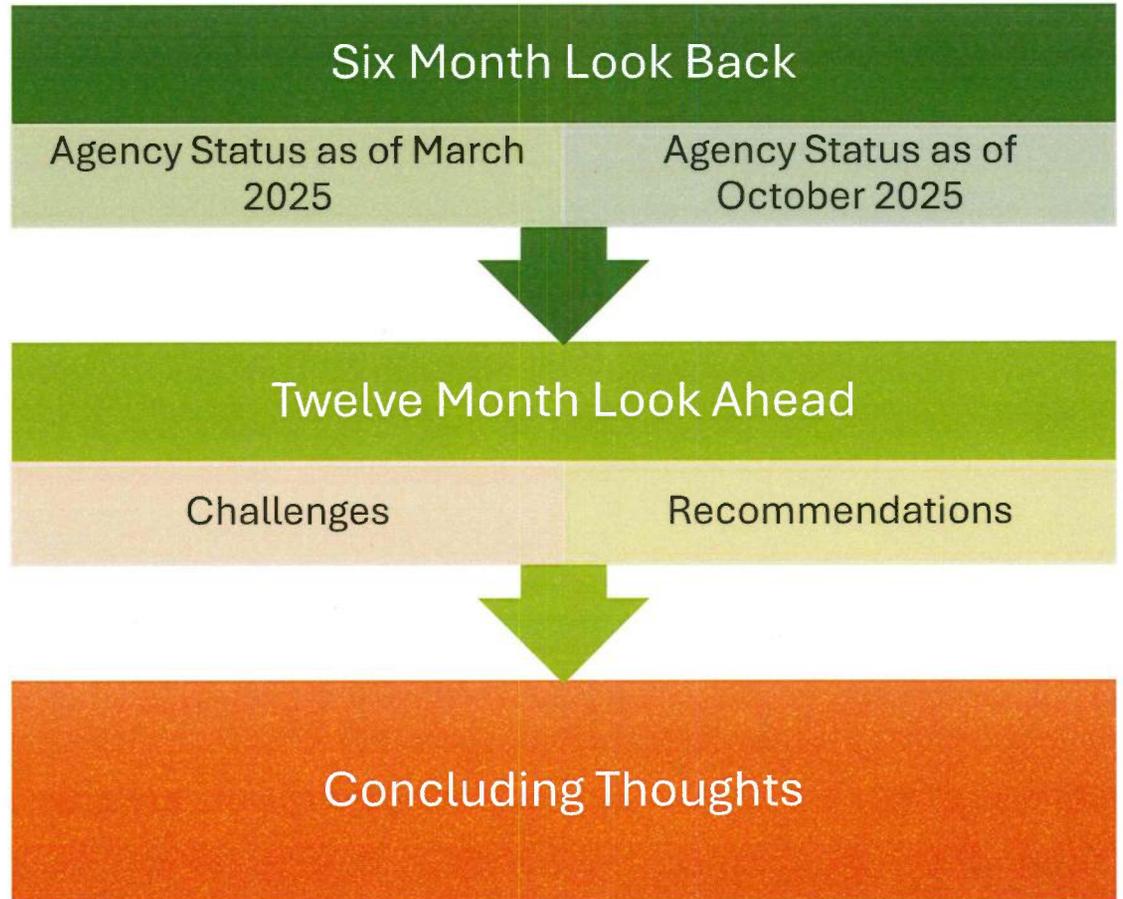
(By the State Elections Enforcement Commission)

Report on the Status of  
the State Elections  
Enforcement Commission  
*March 2025 – October 2025*



Clare Kindall  
Interim Executive Director  
& General Counsel  
October 2025

# OVERVIEW



**SIX MONTH  
LOOK BACK**

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Enforcement

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Post-Election Reviews

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Working with the Public

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Auditors of Public Accounts

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Staffing

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2025 Legislative Session

# SIX MONTH LOOK BACK ALL ENFORCEMENT CASES

## In March 2025

 Total Open Cases – 219

 Included 21 cases referred to Chief State's Attorney's Office

 Included 63 non-filer cases

 110 open cases -2023 & before

 Of the 186 cases filed in 2024, 142 remained open or 76%

 7 open cases filed in 2025

 5 cases lapsed by statute in prior 12 months

## In October 2025

 Total Open Cases – 132

 Includes 29 cases referred to Chief State's Attorney's Office

 Includes 45 non-filer cases

 37 open cases -2023 & before – 17 are non-filer cases; 16 are PER referrals & 4 open cases

 Of the 186 cases filed in 2024, 60 remain open or 33%. 126 (68%) are closed or referred.

 Of 79 cases filed so far in 2025, 30 (38%) are already closed or referred and 49 remain open.

 No cases lapsed by statute

# SIX MONTH LOOK BACK

## POST-ELECTION REVIEW ENFORCEMENT CASES

### In March 2025



65 total open Post-Election Review (PER) Enforcement Cases



From 2020 election – 49 open PER Enforcement cases



From 2022 election – 16 open PER Enforcement cases



From 2024 election – no open PER Enforcement cases

### In October 2025



33 total open Post-election Review (PER) Enforcement cases



From 2020 election – 25 open PER Enforcement cases



From 2022 election – 6 open PER Enforcement cases



From 2024 election – 2 open PER Enforcement cases – 9 more are likely due to failure to file any documents

# SIX MONTH LOOK BACK — ENFORCEMENT

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The backlog of cases has been **cut almost in half** – from 219 to 132.

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The open older cases (filed before 2024) have also been **cut by more than 60%** – from 110 to 39.

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Open cases filed in 2024 have been **cut by more than 50%** - from 142 open cases to 60. 68% of the cases filed in 2024 have been completed or referred for criminal prosecution.

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We currently have 79 cases filed in 2025, of which 30 (38%) have already been resolved or referred. Since July 2025, 42% of the 79 filed cases have been initiated. We are seeing approximately 5 new cases a week.

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Post-election review referral cases have been **cut in half** – from 65 to 33 cases. The PER cases from the 2020 election were cut in half – from 49 to 25. The PER cases from the 2022 election were cut by 60% - from 16 to 6.

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Since March, the Commission has authorized eight hearings, with four hearings already held & issued seven subpoenas.

# SIX MONTH LOOK BACK

## 2022 POST ELECTION REVIEWS

### In March 2025

- Of 179 Post Election Reviews, 52 were complete, or 30%
- 25 drafts were complete & waiting responses, or 14%
- 97 were in the review process or 54%

### In October 2025

- Of 179 Post Election Reviews, 133 are complete, or 74%
- All drafts are complete
  - 39 are in final review
  - 7 likely will be referred to Enforcement

# SIX MONTH LOOK BACK

## 2024 POST ELECTION REVIEWS

### In March 2025

- Of 164 Post Election Reviews, none were complete & 56 had not yet terminated.
- Of 108 that had terminated, none were final, and 17 drafts were about to be sent out.
- Remainder were in process.

### In October 2025

- Of 164 Post Election Reviews, 59 are complete, or 36%.
- 38 drafts sent out – 13 responded and in process of finalized.
- 9 committees failed to provide any documents & may be referred.
- Remaining 58 are in the review process, or 35%.

**SIX MONTH  
LOOK BACK  
—  
POST ELECTION  
REVIEWS**

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## **2022**

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2022 Post Election Reviews approved by Commission more than doubled – from 52 to 133, or from 30% to 74% completed.

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All reviews are now done – for remaining 46, 7 likely to be referred to Enforcement and remainder are in final review.

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2022 Post Election Reviews will be complete by end of 2025.

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## **2024**

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36% of 2024 Post Election Reviews finalized within three months of July termination.

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38 Post Election Reviews are completed and issued in draft – 13 have responded and are going final.

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2024 Post Election Reviews will be complete by end of 2025.

**SIX MONTH  
LOOK BACK**  
—  
**WORKING WITH  
THE PUBLIC**

- The agency handled over 1,400 filings for between approximately 675 and 730 committees related to quarterly campaign finance reports, terminations, registrations and special elections.
- The agency delivered 12 in-person or TEAMS trainings for municipal candidates and committees, town clerks, registrars of voters, and for the Governor's office.
- The agency continues to be one of the few state agencies where people answer the phones, not machines. The Compliance Unit responded to over 1919 calls regarding campaign finance.
- IT responded to over 460 calls regarding CRIS helpdesk support services, which are offered 24/7.

# SIX MONTH LOOK BACK

## AUDITORS OF PUBLIC ACCOUNTS FINDINGS 1-4

### Auditor Findings



Untimely Post-Election Reviews  
(repeat finding)



Failure to file required legislative  
reports (repeat finding)



Failure to maintain software  
inventory



Lack of OT & Comp time  
documentation (repeat finding)

### Resolutions



Overhauled review process and  
format



Filed all but one of the missing  
reports – last one in process



Created software inventory &  
assigned librarian



Strictly requiring prior  
authorization for OT & Comp time

# SIX MONTH LOOK BACK

## AUDITORS OF PUBLIC ACCOUNTS FINDINGS 5-8

### Auditor Findings



Lack of hiring documents for four hires



Lack of SEEC-specific employee handbook (repeat finding)



Untimely posting of receipts



Failure to tag controllable assets

### Resolutions



Clarified responsibilities for obtaining such documentation



Drafted & issued SEEC Employee Handbook



Two accounting interns hired to ensure adequate compliance



New policy interpretation & assets now all tagged.

# SIX MONTH LOOK BACK – STAFFING

## In March 2025

- Multiple staff vacancies
- No clerical positions
- Lopsided Reporting Structure – 37% agency direct reports to Executive Director
- Employee reviews were not conducted in 2024

## By October 2025

- Filling staff vacancies
- Established procedures for hiring Legal Interns
- Created clerical AA position
- Office Structure revised – new Director of Enforcement & only seven direct reports to ED
- Completed all employee reviews by September 30, 2025 deadline

# SIX MONTH LOOK BACK – STAFFING

## In March 2025

- No recognition of anniversaries
- No full office meetings
- No consistent planned training
- No office parties for summer or winter

## By October 2025

- In May, held celebration for 50 years as an agency and 20 years for the CEP Program
- Monthly “All Hands, All In” days
- Held 1<sup>st</sup> ever office-wide Ethics training. Trained on UAPA in September
- Held Office Summer Gathering and will hold a holiday party

**SIX MONTH  
LOOK BACK  
—  
2025  
LEGISLATIVE  
SESSION**

- The agency made three legislative proposals, which became 6 bills drafted by two committees. All 6 were passed out of the two committees but none were passed.
- Monitored over 123 other bills before 8 different committees. Provided both written and verbal testimony on 22 bills.
- The FY 26-27 biennial budget fully funds the agency's operations and includes new funding for an additional Election Officer, bringing total staff to 36 FTEs.
- Planned sweep of \$650,000 from the SEEC's FY 2024 budget in HB 6863 was rejected.
- Public Act no. 25-26 was passed, with substantive changes to agency operations & the CEP. In PA 25-187, section 226, the PA 25-26 provisions regarding the Executive Director position were superseded and returned authority over the Executive Director to the Commission.

# Public Act no. 25-26 – effective July 1, 2025

PA 25-26 Sections	Affected Statute	Descriptions
Sec. 1	§§9-601 (25) and (26)	CEP contribution solicitation changes
Sec. 2	§9-621 (a) to (c)	Elimination of attributions in certain circumstances
Sec. 3	§9-7b (a) (5) (B)	PER lottery: open to public; 20% rather than 50%; must be finished in a year & report to legislature if not
Sec. 4	§9-7b (a) (14)	Declaratory Rulings or Advisory Opinions may not be issued within 180 days of state election
Sec. 5	New	Must publish list of PER docs and can't ask for what isn't on list
Sec. 6	§9-7b (c)	review by Oversight Committee & Leadership of guidance over 40 pgs
Sec. 7	§9-704 (c) to (e)	Consumer Price Index adjustments & Provisions for return of buffer
Sec. 8	§9-706 (b) to (d)	Many changes to the CEP grant application & solicitation standards
Sec. 9	§9-7a (b) to (d)	Commission meetings must be livestreamed Executive Director hiring; superseded by PA 25-187, sec.226
Secs. 10 & 11	§§9-601a (b) & 9-601b (b)	House Party limits increased

## **SIX MONTH LOOK BACK – PA 25-26**

**On July 9, 2025, Agency staff presented an implementation plan for PA 25-26.**

- Revise all written training materials to reflect changes made by Public Act.
- Identify interpretation issues for policy decisions.
- Explore clarifying through regulations, declaratory rulings or legislative proposals.
- Revise Citizen Election Program grant application processes.
- Solidify Post Election Review process used for 2024 and the future.
- Hold lotteries in public and pull only 20% for post election review.

# **SIX MONTH LOOK BACK – PA 25-26**

## **Implementation of efforts are underway.**

- Livestreaming Commission meetings on Youtube.
- Inventoried every piece of agency guidance.
- Revised guidance for ongoing municipal races in 3 guidebooks released and submitted to legislature for its review.
- Revised guidance regarding contribution amounts for 2026 and the requirements for the convention grant.
- Held special election lottery at the Legislative Office Building.
- Proposed regulations regarding the post election lottery.

# TWELVE MONTH LOOK AHEAD

Transparency  
&  
Accountability

Modernization

Staffing &  
Maintaining  
Relationships

Upcoming  
Policy Issues,  
Regulations &  
Declaratory  
Rulings

# 12 MONTH LOOK AHEAD - TRANSPARENCY

## CHALLENGES

### Policy Formation – External

Regulations outdated

Adapting CEP for a changing world.

Post-election review standards unclear

Better methods to engage stakeholders

### Policy Formation - Internal

Compliance advice – ticket system review

Enforcement action – consistency

Commissioners see issues piecemeal

## RECOMMENDATIONS

### Policy Formation – External

Updating & expanding regulations

Pilot programs for new concepts

Publish requirements in clear language

Public roundtables & public comment

### Policy Formation - Internal

Hold internal roundtables

Establish clear policies

Commissioners' approval of regulations & declaratory rulings

# 12 MONTH LOOK AHEAD - ACCOUNTABILITY

## Challenges



Timely Completion of Audits



Clear Policy directives



Timely Completion of Enforcement Actions



PA 25-26 requires the entire agency to retool how grant applications are processed.

## Recommendations



Streamlined Process & adjust lottery timing to capture year time period



Publish regulations or declaratory rulings to address big policy issues



Targeted work through backlog & better utilize other staff when they have downtime



Implement PA 25-26 for criteria applied to grant applications

# 12 MONTH LOOK AHEAD - MODERNIZATION

## Challenges – internal & external

IT Staff stretched too thin & IT systems need upgrading and support

Update CEP Program to reflect modern financial transactions

Update CEP and Audit standards to address issues raised by social media

LaserFiche Case Management failing

Go Paperless & Update physical plant

## Recommendations

Fill IT vacancies, provide promotional ladders & obtain BITS support

Digital wallet declaratory ruling & update CEP guidance & policies

Start public discussion on issues and possible solutions and then implement

Repair Laserfiche and/or research commercial case management systems

Work with DAS to go paperless & update workspace

# 12 MONTH LOOK AHEAD – STAFFING

## Challenges

No Process in place to Evaluate Executive Director & General Counsel & staff not regularly reviewed.

Single point of failures throughout the agency

Managers & staff all need training

## Recommendations

Create process for Commissioners to evaluate Executive Director & General Counsel annually. Review staff timely.

Create teams and safety nets for all agency functions.

Establish training goals and formalize training requirements.

# 12 MONTH LOOK AHEAD

## MAINTAINING RELATIONSHIPS

Legislature

Secretary of  
State

Town Clerks  
& Registrars  
of Voters

Public  
Interest  
Groups

Campaign  
committees

Independent  
committees

General  
Assembly  
candidates

State-wide  
candidates

**TWELVE  
MONTH LOOK  
AHEAD  
—  
UPCOMING  
POLICY ISSUES**

❖ From PA 25-26

- Need to fully implement PA 25-26 provisions
- How to handle state contractor ban when no one is required to confirm.
- How to handle confirming home addresses for in-district contributions while complying with credit card restrictions
- How to handle “rely on the contribution card” mandate – do we sue contributors if they lie or mislead on the card? Chilling effect on campaigns?

❖ From Campaign Finance

- How to address issue of Campaign General Contractors who are not accountable to SEEC but take 50% or more of the CEP grant?
- How to address social media in a clean campaign finance regulatory scheme?
- How to address required documentation for digital media buys?
- How to establish clear audit document requirements?

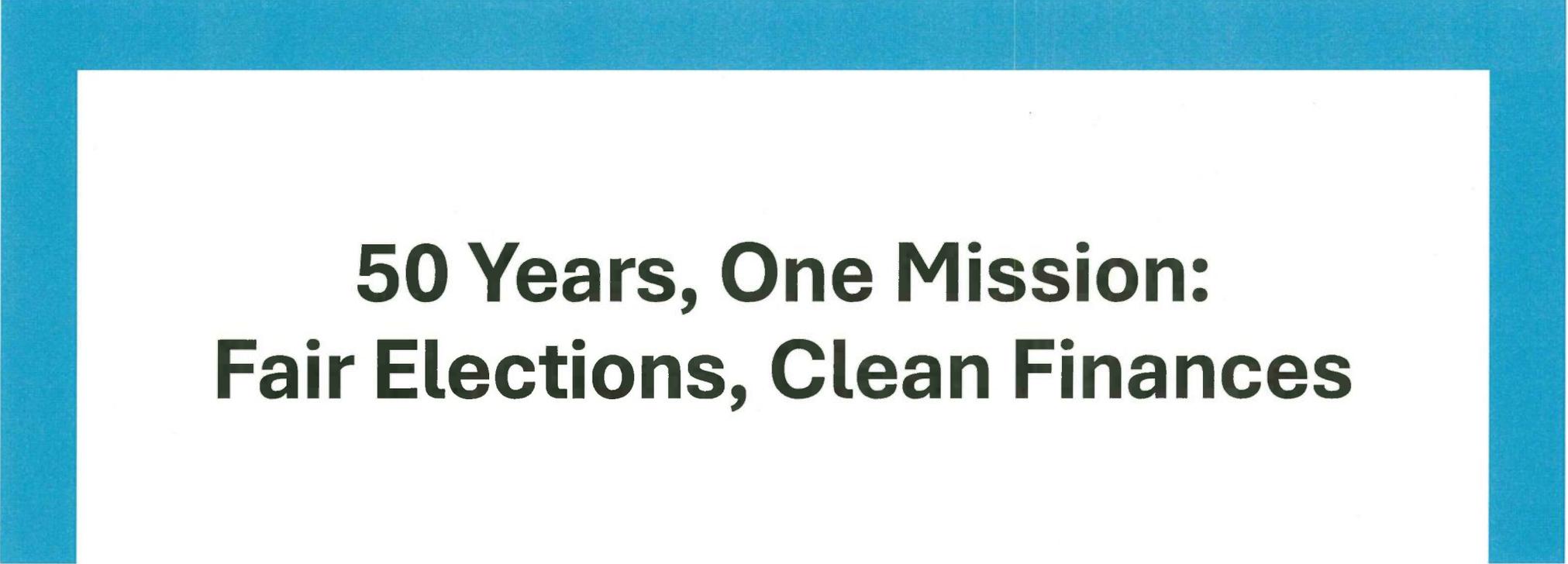
**TWELVE MONTH  
LOOK AHEAD  
—  
PROPOSED  
REGULATIONS  
& DECLARATORY  
RULINGS**

**IN PROCESS**

- ❖ Updated General Practice & Procedure Regulations
  - Hearing held & being submitted for AGO review
- ❖ Post-Election Review lottery procedures Regulations
  - Hearing held & being submitted for AGO review
- ❖ Permitting Digital Wallet Contributions for Campaign Contributions Declaratory Ruling
  - Received comments and drafting proposal

**UPCOMING PROPOSALS**

- ❖ Campaign General Contractor Regulations
- ❖ State Contractor Declaratory Ruling
- ❖ Social Media Reposting Declaratory Ruling
- ❖ Post-Election Review Documentation Regulations



**50 Years, One Mission:  
Fair Elections, Clean Finances**

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# CONCLUDING THOUGHTS

## **Transparency**

- Improve policy formation process
- Facilitate more stakeholder engagement
- Use pilot programs for new ideas
- Publish clear PER standards

## **Accountability**

- Timely completion of audits
- Timely completion of enforcement
- Retool CEP grant application process per PA 25026
- Use regulations or DRs for policy positions

## **Modernization**

- Update and support IT
- Update CEP for fiscal transactions and impact of social media
- Improve case management system
- Go paperless & update physical plant

## **Staff & Structure**

- Have annual reviews of ED & staff
- Eliminate single points of failure
- Institute training expectations

## **Maintaining Relationships**

- Strengthen & nurture existing relationships with stakeholders
- Reach out to stakeholder community

## **Policy Challenges**

- Rely on past successes to meet the upcoming policy challenges in an open and transparent fashion