



# Citizens' Elections Program

## Frequently Asked Questions About Qualifying Contribution Documentation

Please see below for frequently asked questions on documenting qualifying contributions under the Citizens' Election Program. If you have additional questions, please contact Commission staff at [public.finance@ct.gov](mailto:public.finance@ct.gov) or 860-256-2985.

### CONTRIBUTION ID NUMBERS

#### Q: What is a contribution ID number?

A: Each contribution must have a unique sequential identifying number to tie the information reported for that contribution on the SEEC Form 30 to the documentation provided. The copy of each document relating to a contribution must be marked with the **identifying number ("contribution ID number") unique to that contribution.**

- The contribution ID number on the documentation must match the contribution ID number assigned in Section B of SEEC Form 30 itemizing that contribution.
- eCRIS will assign a contribution ID number to each inputted contribution. So once you input the contribution into eCRIS, write the contribution ID number assigned by eCRIS on all documentation related to that contribution.
- Because the contribution ID number is unique to each **contribution** (not contributor or document), if you receive a personal check and a qualifying contribution certification form ("QC Cert Form") for a single contribution, you would **mark the same ID number on all documentation related to that contribution.** If you provide scanned copies of QC documentation, make sure that each document has the contribution ID number assigned by eCRIS written in the upper corner before scanning and then name the scanned image with the unique contribution ID number(s) contained in the document.

#### Q: How do I assign contribution ID numbers via eCRIS?

A: When you enter a contribution in Section B of SEEC Form 30, and save the record, **eCRIS will automatically assign a contribution ID number** in a box next to the name of the contributor at the bottom of the page once you save the entry. Again, be sure to write the eCRIS assigned contribution ID number on *all* documents related to that contribution, such as the copy of the contribution check and the copy of the QC Cert Form.

### PERMISSIBLE SOURCES & AMOUNTS OF CONTRIBUTIONS

#### Q: Who cannot give a qualifying contribution and what should I do if I receive one from a prohibited contributor?

A: Contributions must be from individual human beings and the following may not make them:

- principals of state contractors;
- businesses, including trusts;
- minors under the age of 12; and
- individuals who are not U. S. citizens or without permanent status (green card holders); and
- lobbyists during the legislative session

If you receive a contribution from a non-qualifying source you may refund it before you apply for a grant. You may also disgorge it at the time of your grant application as part of the buffer check written to the Citizens' Election Fund.

**Q: May a high school student make a qualifying contribution?**

Yes, children between the ages of 12 and 17 may give up to \$30. However, minors may **not** give through a parent or guardian's personal check or credit card. The minor must be a signatory on the account or contribute his or her own cash.

**Q: What should I do with contributions received from sole proprietors?**

A: A sole proprietorship is a business in which one human being owns all the assets, owes all the liabilities, and operates in his or her personal capacity. Any other type of business is not permitted to make qualifying contributions, including LLCs. You may accept qualifying contributions from sole proprietors as they are treated the same as an individual.

## **CASH CONTRIBUTIONS**

**Q: What do I do if a contributor gives a cash contribution?**

A: For all cash contribution, as well as contributions by money order, the contributor must complete and sign a QC Cert Form, even if the amount is as low as \$5. These types of contributions cannot be higher than \$100. The contributor should check off the correct "Method of Contribution" box (Cash or Money Order) and must write in the contribution amount on his or her QC Cert Form.

If you receive more than \$100 in cash or money order from a single donor, you should refund the amount over \$100.

**Q: Do I have to photocopy a cash contribution?**

A: No, please do not photocopy cash. But if the contribution is made by money order, you should make a photocopy of the money order before you deposit it into the committee checking account, and copy it onto the space provided on the bottom of the contributor's QC Cert Form. If cash is copied to the bottom of a QC Cert Form, please recopy it with a piece of white paper over the cash, but make sure the re-copy clearly shows the contributor's signature on the QC Cert Form.

## **MAKING CORRECTIONS TO QUALIFYING CONTRIBUTOR CERTIFICATION FORMS**

### **Q: *Can I make a correction on a contributor's QC Cert Form?***

A: Generally, if you obtain additional information after a contribution has been made, you can write a treasurer's note in the margin of the QC Cert Form or get an email from the contributor that verifies the missing or unclear information. If you receive an email, place a copy of it behind the original QC Cert Form in your pre-application or grant application documentation, writing the relevant contribution ID number in the upper right-hand corner of the email. If you do not get an email but write a note on the QC Form based on information you obtained verbally from the contributor, make sure that you initial and date your notes and indicate how you obtained the information (i.e. "5/5/20 phone call to contributor"). Do NOT cross out or mark over any of the contributor's original writing on the QC Cert Form.

For example, if John G. Smith and his son, John G. Smith, who live at the same address, each give contributions, it would be wise for the treasurer to write a note on both QC Cert Forms or get an email from one of the contributors saying that this is a father and son with the same name living at the same address. Other examples of when a treasurer may need to provide clarifying information is when the contributor gives a P.O. box for a residential address or says "self-employed" for employer rather than providing the name under which they do business.

Note that there are some things that a treasurer may **not** change by handwritten note such as the answers to the questions regarding state contractor and lobbyist status, contribution amount, and method of contribution. Changes to this information will require the treasurer to obtain a new CQ Cert Form or email verification from the contributor. Also, a treasurer may **never** sign a certification form on behalf of a contributor.

## **CONTRIBUTIONS FROM JOINT CHECKING ACCOUNTS**

**Q: *Sally and Joe have a joint checking account. Joe gave me a \$100 contribution check signed only by him and each of them provided a signed QC Cert Form for a \$50 contribution. I reported \$50 from Joe and \$50 from Sally. Will the SEEC staff note this as a problem?***

A: While campaign finance law generally attributes the contribution to the **signer** of the QC Cert Form, the treasurer can accept a \$50 contribution from Joe and another \$50 contribution from Sally, even though only Joe signed the \$100 check, since they have a joint checking account and both completed cert forms. With joint checking accounts, the treasurer needs to obtain separate QC Cert Forms from each contributor if both people on the account wish to contribute.

If only one contributor's name appears on the check, the treasurer can verify it is a joint checking account by getting a copy of the contributors' bank statement or other bank record that verifies that the account is a joint checking account. The treasurer may also obtain an email both from the person with their name on the check and from the person filling out the QC Cert Form affirming that the contribution is from a joint checking account which includes the personal funds of the person on the QC Cert Form as well as the person whose name is on the check.

## ONLINE CONTRIBUTIONS

### **Q: How should I document qualifying contributions made by credit card online?**

A: If you plan to raise contributions through an online contribution site, please contact your appointed elections officer as soon as possible so that your interface and generated back-up documentation can be reviewed and approved **before** the site is activated. In order to have your website reviewed and approved, you will need to submit:

- (1) A link to and screenshots of the online contribution interface (which should have the same language and fields as our sample online contribution interface available on our website);
- (2) A sample transaction receipt (a contemporaneous email sent from the merchant account provider immediately to the contributor after the contributor makes the contribution and which includes all of the information provided by the contributor on the online interface);
- (3) The settlement report issued by the merchant account provider that will detail all of the inputted contributor information; and
- (4) An initial MAP letter (a letter from your merchant account provider, webmaster, or treasurer detailing how the site has been set up, including indication whether the site has been configured so that contributors are required to complete the certifications in order to make the contribution).

Please see pages 90-94 of the [CEP Guide](#) and Parts 1 and 2 of the Raising Qualifying Contribution Online Section of the [CEP Online Presentation](#) for more information on setting up an online contribution site.

When it comes time to submit your grant application, you will need to provide transaction receipts of each online contribution (with the contribution ID number marked in the upper right corner) and a second letter from your merchant account provider, webmaster, or treasurer indicating whether any changes have been made to the interface after it was approved (called the "Grant Application Letter"). Your merchant account provider must also submit your completed spreadsheet directly to SEEC.

Please take a look at SEEC's [sample online contribution site and back-up documentation](#) and contact your assigned elections officer ([public.finance@ct.gov](mailto:public.finance@ct.gov) or 860-256-2985) with any questions.

### **Q: Someone filled out the online contribution form as being from "Mary and Bob Jones." May I just report the contribution as from "Mary and Bob Jones" on the SEEC Form 30?**

A: A contribution can only come from one person. In order to qualify this contribution, both Mary and Bob should provide separately signed, properly filled out certification forms stating the amount that he or she is personally contributing. If both contributions are below \$50, you may also provide separate emails from Mary and Bob in which they state that the credit card is paid from his or her personal funds and the amount of the contribution that should be attributed to him or her. The SEEC Form 30 should properly reflect the contributor and the amount given by that person with one entry per each contributor.

**Q: Are there problems unique to credit card donations that I should watch out for?**

A: Yes, parts 1 and 2 of the Raising Qualifying Contribution Online Section of the [CEP Online Presentation](#) review problems we often see and we encourage you to review them.

One common problem the presentation explains is when there is an indication from the merchant account provider in the back-up documentation that the address given by the contributor as a residential address did not match the address on file with the contributor's credit card company. When this occurs you can contact the contributor using the sample email below. Provide a copy of the response email containing the explanation with the contribution ID number either in the subject line of that email or written in the upper right-hand corner of the printout of the email.

Dear [insert contributor name],

There was an indication from the credit card processor that the address you provided as your residential address does not match the billing address associated with the credit card. In order to qualify your contribution, we therefore need additional information.

1. Please provide your residential address
2. Please provide the billing address for the credit card that you used to make the contribution.
3. If the addresses are not the same, please provide an explanation why the billing address associated with the credit card is not your home address.
4. Please affirm that the credit card used to make the contribution is strictly your own personal credit card, has no business affiliation and is in no part paid by a business.
5. Please affirm that the credit card is paid by you, out of your own personal funds.

## **REPORTING ADDRESSES**

**Q: What if the address on the personal check for the contribution differs from the address the contributor wrote on the QC Cert Form?**

A: Always report in Section B of SEEC Form 30 **the residential address the contributor wrote on the QC Cert Form.**

**Q: What address do I report in Section B of SEEC Form 30 if the sole proprietor lives in my district but his shop is located in another district?**

A: Report in Section B the sole proprietor's **residential** address, NOT the location of the sole proprietorship shop or office.

**Q: What if the address on the personal check or QC Cert Form is only a post office box address?**

A: If the QC Cert Form lists a P.O. box address, you must obtain the contributor's residential address. The treasurer may, after verifying this information, write a note in the margin of the QC Cert Form indicating the residential address, how they received the information (i.e. "5/5/20 phone call to contributor"), and initialing it.

If you only have a check copy and the contributor did not provide a QC Cert Form, you can either ask the contributor to complete and sign a QC Cert Form with their residential address or ask them by email for their residential address. If by email, include a copy of the email verification behind the check copy in your documentation package.

If you have reported a post office box on the SEEC Form 30, you will need to amend that filing with the correct residential address for that contributor in order for it to qualify.

**Q: What if my contributor is a police officer and does not want to give her residential address?**

The officer can give her work address or the address of the town hall where she lives. If the officer wants to be counted as in-district, she should put the address of the town hall in which she lives.

A contributor may provide an alternate address to their residential address if the contributor is admitted into the Address Confidentiality Program pursuant to General Statutes § 54-240 (a) or is an individual with protected address status articulated in General Statutes § 1-217. Generally speaking, this includes judges, law enforcement officers, certain attorneys, inspectors and social workers employed by the criminal justice system; firefighters; and certain employees of the Department of Correction, the Department of Children and Families, the Board of Pardons and Paroles, the judicial branch, the Department of Mental Health and Addiction Services or the Commission on Human Rights and Opportunities.

## **REPORTING EMPLOYER & OCCUPATION INFORMATION**

**Q. If I receive a contribution from someone who has not filled out the Name of Employer or Occupation fields, may I accept it?**

A: SEEC cannot accept or qualify contributions from individuals who have contributed more than \$50 to the campaign unless they have provided their employer name and principal occupation information on their QC Cert Form or online contribution submission.

**Q: What should I do if I receive a contribution from an individual who only writes "self-employed" or "self" under the Name of Employer?**

A: You can (1) ask the contributor to fill out a new QC Cert Form listing the name of their business; (2) write in the contributor's name of business, indication of how you obtained the information (i.e. "5/5/20 phone call to contributor"), and initial the change on their QC Cert Form / online contribution transaction receipt; or (3) get email verification of their business name and submit a copy of the email, with the contribution ID number written in the upper right-hand corner, behind the QC Cert Form / online contribution transaction receipt submitted in your package.

To clarify the name of a contributor's employer, you can ask the contributor to provide the name of the business to which their clients make payments. For example, if the contributor is a carpenter and his customers write check payments to Joe's Carpentry, this would be the name of the employer that should be provided on his QC Cert Form.

**Q: Can I accept qualifying contributions from those who put retired, unemployed, student, or homemaker as their name of employer and principal occupation?**

A: Yes.

## **SUBMITTING QUALIFYING CONTRIBUTION DOCUMENTATION TO SEEC FOR GRANT APPLICATION**

**Q: If I get 50 contributions made by personal check, I know that I have to make a copy of each before depositing them into the campaign account. Can't I just submit those copies to SEEC with my grant application?**

A: Campaign finance laws require the treasurer to keep all campaign records, including copies of checks, for four years after the date of the committee's last filing. Make sure you keep all originals (including original signed QC Cert Forms) and a complete set of copies (QC Cert Form with copy of check at the bottom) for the campaign. **Make an additional copy of all qualifying contribution documentation** for use when applying for a grant. The copies that you submit to SEEC must each be marked with a contribution ID number, as described earlier. Please make sure that all QC Cert Forms are legible and that the copies of checks or money orders are complete copies and are not blocking signatures or any other contributor information.

**Q: Why can't I copy all the personal checks together, separate from the copies of the QC Cert Forms?**

A: SEEC strongly recommends that you copy the personal check related to the contribution onto the space provided at the bottom of the QC Cert Form for that contribution.

- If checks are copied separately, you may miss marking the correct contribution ID number on the separated QC Cert Form and check.
- The more organized, legible, and complete your documentation submission is, the quicker a grant reviewer can work on it, and your likelihood of a timely review increases!
- If it is absolutely necessary that you submit copies of the checks separately, each check **must** be identified with the applicable contribution ID number.

**Q: Can I scan my qualifying contribution documentation and submit scanned copies via a USB flash drive with my grant application?**

A: Absolutely. Make sure that each scanned image is marked with the applicable contribution ID number in the upper right-hand corner, arranged sequentially by contribution ID number, and that the flash drive is labeled with the committee name, treasurer's name, and phone number. On the flash drive, you can save the documentation in batches – please label each file accordingly (i.e. Contributions 001-100, Contributions 101-200, etc.). When dropping off the flash drive, please be sure to place it inside an envelope labeled with the committee's name, treasurer's name, and phone number, along with any other paper documentation you are submitting inside the envelope as well.

**Q: Can I email my scanned documentation?**

A: As a general rule, no. If you have attachments with a large quantity of data, SEEC may not be able to receive it all due to the size, or due to security features in the State network. Additionally, since other portions of the grant application package cannot be filed electronically (such as Form CEP 10, 12, and 15, and the “buffer” check written to Citizens’ Election Fund for excess qualifying contributions), it is better to include your scanned documentation on a flash drive delivered at the time of application. Committees should contact their elections officer when they are ready to submit to set up an appointment to review documentation and ensure that a complete package is submitted. This process helps committees to qualify more quickly.

**Q: If I plan to submit a paper copy of my qualifying contribution documentation, any tips on the best way to provide it?**

A: Yes – please provide it in an envelope, labeled on the outside with the committee name, treasurer’s name, and phone number. Do not staple, paper clip, or scotch tape your documentation or provide it in a vinyl cover or sleeve or in a binder. Also avoid hole punching any of your documentation. Make sure your documentation is sequentially ordered by contribution ID number and that each piece of paper included in the submission is marked with a contribution ID number in its upper right-hand corner.

**Q: Can I drop off my qualifying contribution documentation at SEEC offices when I am ready to apply?**

A: For 2020, due to the COVID-19 pandemic, our offices are closed to the public at the time of this publication. A drop box has been set up to receive grant application packages and is located in the public entrance of our building at 20 Trinity Street, next to the security guard station located in the lobby after entering through the first door. SEEC staff will be regularly monitoring the drop box daily and will contact campaign staff to acknowledge receipt. Before dropping off your grant application package, you should make an appointment to speak with your elections officer about your grant application.

## **PREPARING TO APPLY FOR YOUR GRANT**

**Q: I think I am ready to apply for a grant. What should I do next?**

A: Make an appointment with your elections officer! He or she will walk you through all of your next steps. We also encourage you to begin reviewing the [Grant Application Review Checklist](#) to make sure you have all things in order when it comes time for your appointment.

**CONNECTICUT STATE ELECTIONS ENFORCEMENT COMMISSION**  
55 Farmington Ave · Hartford, Connecticut 06105  
Elections Officers: 860-256-2985