

Additional Comments to SEEC on Proposed Declaratory Ruling 2018-01:

I have been a consumer of the SEEC's compliance advice since 1997. I have appreciated the clear organization of the Commission's Guidebooks and have sought and obtained interpretations, explanations, guidance and useful advice over the telephone from Commission staff on dozens of occasions.

Given the current demands on the SEEC, with the unprecedented number of candidates participating in the Citizens' Election Program and the agency's reduced staffing, I suggest that the SEEC withdraw Proposed Declaratory Ruling 2018-01 and close this proceeding.

The SEEC can respond, as it always does, to telephone inquiries regarding contemplated political activity. Given the current workload of the SEEC, responding to individual inquiries is a better use of the Commission's time than attempting to craft a reliable and robust Declaratory Ruling at this time.

In place of Proposed Declaratory Ruling 2018-01, I propose that the SEEC post on its website answers to election-related activities by civic groups, as suggested below. These bare-bones responses are intended to be supplemented, as necessary, by advice delivered in response to telephoned inquiries.

Respectfully submitted, Penny Bellamy



**Answers to Frequently Asked Questions regarding election-related activities by loosely associated groups of individuals:**

*NOTE: SEEC lawyers will respond to questions by telephone – call: 860-256-2940 and describe your question to the person who answers the phone. In general, the SEEC is concerned to protect the integrity of the Citizens' Election Program, Connecticut's groundbreaking election public financing program, under which candidates pledge to accept only the grants allowed under law. Expenditures to support a candidate or campaign are tightly regulated in order to protect the integrity of the Citizens' Election Program and maintain public confidence in the Program. The Citizens' Election Program was designed to encourage citizen participation and limit the role of private money in Connecticut's political process.*

**Question:** My group has no intention of spending any money on the election of 2018. However, we want to encourage our members to be politically active. May we encourage our members to work for candidates?

**Answer:** Yes. You may encourage your members to work in a campaign, to volunteer for a candidate, to canvass for a candidate or slate of candidates, to make phone calls for a candidate or slate of candidates. In general, an informally

organized group of individuals may encourage each other (its “members”) and the public to participate fully in electoral activities organized by campaigns and/or candidates.

**Question:** If we spend no money in doing so, may our group organize activities to support a candidate or slate of candidates?

**Answer:** Yes. Informally organized groups of individuals may organize campaign activities (poll standing, visibility, phone-banking, canvassing) that support the election of a candidate or slate of candidates.

**Question:** Does the SEEC view using social media to communicate among “members” of a civic group/loosely associated group of individuals to be “making an expenditure”?

**Answer:** No. Sending communications by text or over the Internet through email, a communications platform established for general group communications, and/or social media is not considered by the SEEC to be “making an expenditure” in support of a candidate or campaign.