

Thank you for the opportunity to comment on *Proposed Declaratory Ruling 2018-01: Political Activity of Organized Groups* ("Proposed Declaratory Ruling" or "Declaratory Ruling"). I request that its guidance be expressed more plainly.

My concern is for the "informally organized groups of individuals" who have some interest in participating in the Connecticut state elections of 2018. There are dozens of such groups. In general, the leaders and individuals who make up these groups were unaware that any of their activities might be subject to state law or regulation until word spread of the complaint filed against Greenwich Indivisible by J.R. Romano. Complaint No. 2017-065. Word of that complaint had a great chilling effect on the intentions of these groups and their members.

These "informally organized groups of individuals" do not have lawyers to interpret laws, regulations or rulings of the State Elections Enforcement Commission (the "SEEC"). They need the guidance of the SEEC to be delivered in plain language.

To the extent that the style and vocabulary of the Declaratory Ruling is not perfectly clear to the individuals who make up such groups, its issuance is unlikely to dispel the chilling effect caused by the Romano complaint.

The level of clarity that I believe is necessary to avoid confusion, hesitancy and outright abandonment of political activity by such groups is roughly equivalent to the directions to travelers going through security lines at airports – *Remove shoes, place all belongings in a bin, laptops and other electronics on top*. If it is not possible to provide this level of clarity in the Declaratory Ruling, I request that the SEEC develop guidance of this clarity and post it on the website, as soon as possible. Alternatively, perhaps SEEC staff could develop a Guide to Connecticut Elections for Citizen Activists – the Commission's Guides are excellent, helpful documents.

Again, thank you for the opportunity to comment on the Proposed Declaratory Ruling.

Penny Bellamy