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I. Introduction

This publication serves as a guide for traditional political committees that intend to raise and spend funds in connection with elections or primaries for offices held in Connecticut at the state, district, or local level. Traditional political committees are political committees that may make contributions to and coordinated expenditures with candidates and other committees. Independent expenditure political committees are a type of political committee that may not make contributions to or coordinated expenditures with candidates or committees and consequently have less restrictions on the sources from which they can receive. For more information on the differences between traditional and independent expenditures, please see [Chapter II](#). The Commission also publishes guides for party committees and various types of candidates.

The Connecticut campaign finance laws applicable to political committees appear in Chapter 155 of the Connecticut General Statutes, Sections 9-600 through 9-625. Copies of the campaign finance laws, disclosure forms, and committee registration statements are available at both the State Elections Enforcement Commission's office and on our website, <https://portal.ct.gov/seec>.

A. Changes in the Law

Since the previous edition of this guide, the legislature has not made significant changes to the campaign finance laws.

During the 2021 session, the legislature passed Public Act 21-76 which made some changes to the state contractor provisions. The Act requires state agencies and quasi-public agencies to include in bid specifications and requests for proposals a copy or link to a Commission-prepared notice regarding the state contractor provisions and also mandates that covered state contracts contain a representation that the contractor has received such notice. Previously, agencies were required to obtain written acknowledgement of this notice from the state contractor but this requirement was removed. The Act also requires state contractors to provide to state agencies certain certifications regarding past contributions made by their principals which was previously in the law but not under the Commission's jurisdiction. Political committees are not directly affected by these changes but may find it helpful to be aware of them as potential contributors determine whether they are covered by the state contractor contribution and solicitation restrictions laid out in [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#).

B. Changes in this Guide

This Guide offers additional clarification of existing law based on questions received by Commission staff since the previous edition of the Guide.

We wholeheartedly welcome suggestions for future improvements to this Guide from you, the political committee chairpersons, treasurers, and committee workers that are its intended audience. Please remember, the Guide is **not** a substitute for statutes and regulations. Anyone using this guide should refer to the specific statutory provisions,



regulations, declaratory rulings, and advisory opinions of the Commission referenced throughout.

C. Requesting Compliance Advice

Anyone subject to Connecticut's campaign finance laws is encouraged to contact the State Elections Enforcement Commission to discuss how the campaign finance provisions apply to them in a particular situation. You may request advice by calling the Commission or by writing to us by U.S. mail or e-mail. **PLEASE DO NOT request advice for the SAME QUESTION using more than one of these methods.**

1. Call the Compliance Unit at 860-256-2940;

OR

2. Make a request for written advice.

You may submit a request for written advice by e-mailing seec@ct.gov (including "compliance advice" in the subject line) or by sending a letter to:

State Elections Enforcement Commission
Attn: Compliance Unit
55 Farmington Avenue, 8th Floor
Hartford, CT 06105

In your request for advice, please include a complete description of all relevant facts and a specific question. Your request must concern a specific transaction or activity that you plan to undertake or are currently undertaking and intend to continue in the future.

The Commission and/or its staff issue three types of written advice: opinions of counsel, advisory opinions, and declaratory rulings. An **opinion of counsel** is an opinion by Commission staff counsel; it is not binding on the Commission. The person requesting the opinion of counsel may rely upon the opinion with respect to any matter brought before the Commission based upon the same facts and circumstances addressed in the opinion of counsel. If there is an omission or change in any of the facts or assumptions presented, and such omission, fact or assumption is material to the conclusions presented in the opinion of counsel, then the requestor may not rely on those conclusions in support for such activity brought before the Commission.

When the Commission receives similar questions from various individuals or concludes that the regulated community would best be served by more general, written guidance, the Commission may opt to issue an **advisory opinion**. An advisory opinion is an official Commission statement on a question relating to the application of Connecticut campaign finance law. Unlike an opinion of counsel, upon which only the recipient named in the opinion may rely, the regulated community at large may rely on an advisory opinion, which is voted on and adopted by the Commission.

Finally, the Commission may issue a **declaratory ruling**. The purpose of a declaratory ruling is to obtain the Commission's ruling as to the applicability to specified



circumstances of a provision of the General Statutes, a regulation, or a final decision on a matter within the Commission's jurisdiction. A declaratory ruling generally involves a comment period and people on file having requested notice of such opportunities to comment are made aware of the draft available for comment. Contact your Elections Officer to be added to this list if you would like such notice. An individual may petition for a declaratory ruling or the Commission may initiate a proceeding on its own motion. A petition for a declaratory ruling must: (1) state clearly and concisely the substance and nature of the petition; (2) identify the statute, regulation and/or order which the petition concerns; (3) identify the particular aspect to which the petition is directed; and (4) be accompanied by a statement of any supporting data, facts, and/or arguments that support the petitioner's position. A declaratory ruling has general applicability.

The Compliance Unit will NOT respond to requests for oral or written advice concerning:

1. The conduct of another individual, committee, or entity.

The Compliance Unit may provide you only with advice concerning your own conduct. Complaints about the conduct of another individual, committee, or entity should be registered through the complaint process administered by our Enforcement Unit.

2. Conduct that has already occurred.

The Compliance Unit may provide you only with advice concerning your current or future conduct.

3. Issues that are not covered under the campaign finance statutes.

The Compliance Unit may only provide you with advice concerning Chapter 155 through 157 of the General Statutes, portions of Chapter 152 concerning referenda, and General Statutes 9-7a and 9-7b, the enabling statutes for the State Elections Enforcement Commission.



II. Requirement to Form a Political Committee

If you wish to raise or spend money to promote the success or defeat of candidates, referendum questions, or a political party, you may be required to form a political committee, of which there are two major types – (1) traditional political committees; and (2) independent expenditure political committees. Whether you must register a political committee and which of these two types will depend on the answers to some basic questions:

- Will you be raising money to spend in Connecticut elections or referenda?
- Will you be giving monies or in-kind donations to candidates, candidate committees, party committees, or traditional political committees?
- Will you be working in coordination with candidates or such committees?

This chapter will explain the general requirements for individuals and other persons wishing to engage in certain political activity – when they need to report activity, when they need to register a political committee, and which forms they would use to do so – which will be based on how the above questions are answered.

Please keep in mind that Connecticut campaign finance law uses the term “**individual**” to generally mean a human being and uses the term “**person**” very broadly to mean “an individual, committee, firm, partnership, organization, association, syndicate, company trust, corporation, limited liability company or any other legal entity of any kind but does not mean the state or any political or administrative subdivision of the state.”

[General Statutes §§ 9-601(9) and (10)]

A. Incidental Spenders: Individuals & Preexisting Groups

An incidental spender is someone who answers the key questions as follows:

- | | |
|--|----|
| Will you be raising money to spend in Connecticut elections or referenda? | NO |
| Will you be giving monies or in-kind donations to candidates, candidate committees, party committees, or traditional political committees? | NO |
| Will you be working in coordination with candidates or such committees? | NO |

Incidental spenders are those making expenditures from their general treasury. In other words, these are individuals or groups who are **not raising** money specifically for use in Connecticut elections or referenda but rather are spending out of their existing treasury to make expenditures that are **wholly and totally independent** of candidates, candidate committees, party committees, and traditional political committees.

1. An Individual Acting Alone Spending Personal Funds

An individual acting alone and using personal funds may make **contributions** to candidates and committees, subject to source and dollar limits, from their own funds without forming a political committee. The candidate or committee to which the individual is giving will report the contribution on their financial disclosure statements.



This is true for monetary contributions, in-kind contributions, and coordinated expenditures.

Individuals acting alone and using personal funds may also make unlimited **independent expenditures** and need not form a political committee. They do not need to file anything if spending \$1,000 or less in the aggregate. However, if they spend or obligate to spend in excess of \$1,000 in the aggregate, the individual must file a financial disclosure statement called a [SEEC Form 26-LONG](#) for the first filing and a [SEEC Form 26-SHORT](#) for any subsequent filings. These filings are due according to the regular filing dates for candidate committees but more frequently for certain elections during specific timeframes as laid out below. Since an individual who spends or incurs over \$1,000 in independent expenditures is required to disclose, it is highly recommended that such an individual keep track of their spending, so they know when they hit the \$1,000 trigger.

[General Statutes §§ 9-601d, 9-602(a), 9-612(d); Advisory Opinion 2014-02]

2. Preexisting Groups

Preexisting groups are entities or informal associations that have an existing bank account that was established for reasons other than spending on candidates. The funds in the bank account cannot have been raised for the purpose of spending on candidates, referenda, or committees. Preexisting groups include organizations, businesses, both for profit and not for profit, whether organized in Connecticut or any other state, taxpayer groups, parent-teacher associations and other similar groups.

Candidates and committees (other than independent expenditure political committees) cannot accept contributions from preexisting groups. In order to give contributions to or make coordinated expenditures with candidates, candidate committees, party committees, or traditional political committees, a preexisting group must form a traditional political committee and make contributions through it.

Like individuals, preexisting groups may, acting independently, make unlimited independent expenditures. Preexisting groups that spend \$1,000 or less on independent expenditures from their existing treasury funds are not required to report as long as they do not **raise** new funds for the purpose of making the independent expenditure (in which case they would be required to form a political committee, see below). When a preexisting group spends or incurs over \$1,000 in independent expenditures, however, it must register and report using the [SEEC Form 26-LONG](#) for its first filing and use the [SEEC Form 26-SHORT](#) for any subsequent filings. These filings generally are due according to the regular filing dates for committees but more frequently during specific timeframes, as laid out below.

A preexisting group that wishes to **raise** money to make independent expenditures, and will never make contributions, with respect to Connecticut candidates, referenda or committees would need to form an independent expenditure political committee as laid out in the Section B of this chapter.



Important Note: For grassroots groups choosing to raise and spend less than \$1,000 and wondering what types of activities they can do without triggering the need to form a political committee, additional guidance may be found in Declaratory Ruling 2018-01: Political Activity of Organized Groups.

[General Statutes §§ 9-601(10), 9-601c, 9-601d, 9-602(a), 9-613(c), 9-614(a)]

3. Filing Requirements for Incidental Spenders

For preexisting groups and individuals acting alone, spending their own existing funds on independent expenditures, they are considered “incidental spenders.” As discussed previously, they do not need to file if they spend \$1,000 or less on independent expenditures but if they spend or incur over \$1,000, they must register and report using [SEEC Form 26-LONG](#) for their first filing and the [SEEC Form 26-SHORT](#) for any subsequent filings. The [SEEC Form 26-LONG](#) includes certain identifying information about the spender as well as information about the underlying expenditures and will only be filed one time for each election cycle. After that, the spender will use the [SEEC Form 26-SHORT](#) to disclose subsequent independent expenditures which separately exceed \$1,000 in the aggregate.

If an incidental spender is spending or obligating to spend in excess of \$1,000 on a General Assembly or statewide office candidate, it must file within 24 hours of making or obligating to make the expenditure if it occurs during the primary campaign or general election campaign period – which is essentially the period beginning the day after the convention, caucus, or town meeting is held for the purpose of endorsing or nominating the candidate, as the case may be.

If the triggering expenditure is made or obligated to be made before this period in the case of a General Assembly or statewide office candidate, or it is being made or obligated to be made for municipal candidates, judge of probate candidates, party committees, or on referenda, the spender would need to report the expenditure(s) whenever the next filing would be due by a candidate committee.

EXAMPLE A: An individual acting alone makes independent expenditures exceeding \$1,000 to promote a statewide candidate on March 20 of an even year (before the primary campaign or general election campaign period has begun). The individual must file a statement reporting the expenditure with the Commission by no later than April 10, the standard, quarterly filing date. The period covered would be March 20 through March 31 and report all activity that has occurred during that time. If the individual does not make any expenditures after this time, she will have no further filings.

EXAMPLE B: On July 13 of an even year, a preexisting group incurs an independent expenditure in excess of \$1,000 to promote a senate candidate facing a primary. Since this is during the primary campaign period, the group must report the activity to the Commission no later than 11:59 p.m. on July 14.

To reiterate, persons that are not required to form committees are only required to file incident-specific statements – meaning that once the person has filed a statement reporting an independent expenditure or expenditures, it will not have any further



disclosure statements if it does not make or obligate to make any additional independent expenditures.

[General Statutes §§ 9-601d, 9-612(d), 9-700; Advisory Opinion 2014-02]

B. Political Committees: Two or More Individuals Acting Together & Raising Funds for Candidates, Referenda, and/or Political Parties

Individuals or persons are generally required to form political committees if they answer:

Yes, we will be **raising** money to spend in Connecticut elections or referenda.

Which type of political committee they must form depends on the answers to the second and third questions as laid out in the next two subsections.

1. Two or More Individuals

Two or more individuals acting together and who solicit and receive contributions for spending on candidates, referenda, or political parties must generally register a political committee and file financial disclosure statements. What type of committee they form will depend on the type of expenditures the committee wishes to make.

a. Independent Expenditure Political Committees

Individuals acting together may form an **independent expenditure** political committee, if they answer:

No, we will not be giving monies or in-kind donations to candidates or committees.

No, we will not be working in coordination with candidates or committees.

Independent expenditure political committees may **never** make contributions, including coordinated expenditures, to candidates or committees (although an independent expenditure political committee is permitted to make contributions to other independent expenditure political committees).

Individuals acting together that do not receive funds in excess of \$1,000 or make or incur expenditures in excess of \$1,000 should keep in mind that they are provided with a "**safe harbor**," meaning they are **not** required to register a political committee so long as they stay under the \$1,000 threshold. But if such individuals acting together receive funds exceeding \$1,000 in the aggregate or make or incur expenditures exceeding \$1,000 in the aggregate, they must register a political committee and comply with the requisite disclosure requirements which will be laid out later in this guide. Since a group that has reached the \$1,000 threshold must form a political committee and disclose all of its previous financial activity, it is highly recommended that any group of two or more individuals engaging in election spending keep records of **all** of its financial activity.

Once the \$1,000 threshold is exceeded, the individuals must register an independent expenditure political committee by completing a [SEEC Form 8](#), "Independent Expenditure Only Political Committee Registration." The Commission will be releasing a separate guide for independent expenditure political committees.



Important Note: Keep in mind that the “safe harbor” mentioned above is for filing only and does **not** exempt two or more individuals acting together on independent expenditures and receiving or spending less than \$1,000 from the **attribution requirements**, which are set forth later in this Guide, in [Chapter VII. Spending Committee Funds](#).

b. Traditional Political Committees

Individuals acting together must form a **traditional** political committee when they answer either or both of the following in the affirmative:

Yes, we will be giving monies or in-kind donations to candidates or committees.

Yes, we will be working in coordination with candidates or committees.

Traditional political committees may spend money to make contributions to candidates and other Connecticut committees, and to make independent expenditures as well. Since they may make contributions, however, there are contribution limits set on what they may receive, as laid out in [Chapter V. Raising Funds for Your Committee](#).

Note that the \$1,000 safe harbor mentioned in the previous section applies only to monies raised and spent by a group of individuals seeking to make independent expenditures. It does **not** apply to two or more individuals acting together and making a **contribution** or a **non-independent (coordinated) expenditure** with a candidate or committee or agent thereof. Thus, such groups must register as political committees from the start, even if they have not hit the \$1,000 threshold.

EXAMPLE C: Two individuals acting together each spend \$100 on an independent expenditure to print a communication promoting a candidate. They are not required to register a political committee or file financial disclosure statements because they have only received or spent an aggregate of \$200 on the independent expenditure and can therefore avail themselves of the \$1,000 safe harbor. If they then spend \$900 of their funds on another independent expenditure benefiting the candidate, they would be required to register a political committee because they have exceeded the \$1,000 threshold.

EXAMPLE D: Two different individuals acting together each spend \$100 on a non-independent expenditure (an expenditure coordinated with a candidate or their committee) to print a communication promoting a candidate. Since the expenditure is coordinated and thus a contribution, the individuals are required to register a political committee and file financial disclosure statements because the candidate's candidate committee may only receive contributions from registered committees and not from groups of people. The group would have to form a traditional political committee since they are making contributions.

[General Statutes § 9-602(a)]

2. Preexisting Groups

Preexisting groups, which, as mentioned above, include organizations, unions, businesses both for profit and not for profit, taxpayer groups, parent-teacher associations, and similar groups, also have the choice to form a political committee



and must do so depending on their goals. A preexisting group is generally required to form a political committee when it answers:

Yes, we will be **raising** money specifically to spend on Connecticut elections or referenda.

Which type of committee it must register depends on how it answers the second and third questions.

a. Independent Expenditure Political Committees

The group may form an **independent expenditure** political committee if it answers:

No, we will not be giving monies or in-kind donations to candidates or committees.

No, we will not be working in coordination with candidates or committees.

And, again, it need only form a political committee if it wishes to **raise** money for the purpose of making the independent expenditures. If it does not want to raise money for this purpose, but rather will be using existing treasury funds not raised for such purposes, then it may make independent expenditures as an incidental spender as discussed in the previous section. A preexisting group may also choose to form a political committee regardless of whether it intends to raise money from other sources.

Independent expenditure political committees may **never** make contributions, including coordinated expenditures (although an independent expenditure political committee is permitted to make contributions to other independent expenditure political committees).

b. Traditional Political Committees

Preexisting groups must register a **traditional** political committee if they answer either or both of the following in the affirmative:

Yes, we will be giving monies or in-kind donations to candidates or committees.

Yes, we will be working in coordination with candidates or committees.

Candidates and committees (other than independent expenditure political committees) may only accept contributions from committees. They may not accept contributions from preexisting groups. Political committees set up to make contributions to candidates and committees are called "traditional political committees," and have contribution limits as laid out in [Chapter V. Raising Funds for Your Committee](#). This type of political committee is the subject of this guide.



III. Responsibilities of the Committee Chairperson

A. Designation and Registration of a Traditional Political Committee

1. When and What to File

The chairperson must register a political committee within **ten days** of the committee's organization unless it organizes within ten days of an election, primary or referendum for which it intends to solicit contributions or make expenditures, in which case the chairperson must **immediately** file the registration with the appropriate filing repository. Registration of a traditional political committee is accomplished by submitting a registration statement, [SEEC Form 3](#), "Political Committee Registration."

Electronic registration is available and strongly encouraged. A video on how to electronically register may be found [here](#).

In addition to the registration statement, all political committees are required to file a campaign finance disclosure statement itemizing their initial contribution or disbursement. If the initial contribution or disbursement made to the committee precedes the filing of the registration statement, then the committee's treasurer must file the initial statement itemizing this transaction ([SEEC Form 20](#), "Itemized Campaign Finance Disclosure Statement") along with the registration statement. If the initial contribution or disbursement is received after the filing of the registration statement, the treasurer must file an itemized report ([SEEC Form 20](#)) within **48 hours** of receiving the initial contribution or disbursement.

[General Statutes §§ 9-602(a), 9-605(a) and (b)]

2. Where to File

The **State Elections Enforcement Commission** is the proper filing repository with respect to the following political committees:

- All traditional political committees formed to promote the success or defeat of candidates for one or more of the following offices: Governor, Lieutenant Governor, Secretary of the State, Treasurer, Comptroller, Attorney General, judge of probate, state senator, and/or state representative.
- All traditional political committees formed to promote the success or defeat of one or more of the aforementioned candidates and that also wish to spend on proposed constitutional amendments or referenda.

The **town clerk** is the proper filing repository with respect to the following political committees:

- Traditional political committees formed **solely** to promote the success or defeat of candidates for town, city, or borough office.



- Traditional political committees formed **solely** to promote one or more of the aforementioned candidates and also wish to spend on local referenda.

Important Note: If your committee is formed to promote the success or defeat of municipal candidates **and** statewide office and General Assembly candidates, you should register with the State Elections Enforcement Commission only.

Political committees set up to spend on **constitutional amendments or local referenda** and not candidates would file on the [SEEC Form 8](#). If a committee wishes to make contributions to candidates *and* spend on referenda / constitutional amendments, it would do so by forming a traditional political committee ([SEEC Form 3](#)).

[General Statutes § 9-603(a) and (b)]

3. Amendments to Registration

Any **additions or revisions** to the information contained in a registration statement must be made by submitting an amended registration statement ([SEEC Form 3](#)) to the appropriate filing repository not later than **ten days** after the addition or change. Unless the amendment involves a change in officer, the treasurer may sign and submit the amendment without the chairperson's signature. For committees filing with the Commission, amended registrations may be done electronically through eCRIS or on paper, but electronically is strongly encouraged. For committees filing with the town clerk, amended registrations must be done on paper.

[General Statutes § 9-605(c)]

B. Designation of a Depository Institution

The committee's registration statement ([SEEC Form 3](#)) must contain the name and address of a single depository institution located in Connecticut. The committee must deposit all committee funds into a single checking account established within the designated depository and the treasurer may only make expenditures from this one account.

[General Statutes §§ 9-602(a), 9-605(b), 9-607(e); Advisory Opinion 1975-6]

Important Note: In order to create a bank account, many financial institutions require the committee to obtain a Federal Employer Identification Number (FEIN). The committee treasurer should contact the Internal Revenue Service (IRS) regarding a FEIN and the necessity to make filings regarding the committee's taxable income.

Any questions about these IRS filing requirements should be directed to the IRS's Tax Exempt and Government Entities Customer Account Services toll free telephone number, 1-877-829-5500. Additionally, information is available at the IRS website: www.irs.gov. Commission staff cannot provide information or advice about these rules or requirements.



C. Designation of a Treasurer and Deputy Treasurer

1. Appointment of a Treasurer and Deputy Treasurer

The committee chairperson must appoint one individual, who is a Connecticut elector (registered voter in Connecticut), as treasurer. The committee chairperson may appoint another such individual as deputy treasurer, who must also be a Connecticut elector. It is **highly recommended** that each committee have a deputy treasurer who can deposit funds and make or authorize expenditures and other committee payments if the treasurer is unavailable.

The committee treasurer and deputy treasurer (if applicable) must co-sign the registration statement ([SEEC Form 3](#)) filed by the chairperson, signifying their acceptance of the appointment. Once appointed, the treasurer and deputy treasurer (if applicable) serve indefinitely. The treasurer (or deputy treasurer if the treasurer is unavailable) is solely responsible for receiving, depositing, and expending funds, for filing financial disclosure statements with the proper filing repository, and for keeping internal records of all transactions, as more fully discussed in [Chapter IV. The Role of the Treasurer](#).

[General Statutes §§ 9-602(a) and (c), 9-605(a), 9-606(d), 9-607(a) and (d)]

2. Resignation and Replacement of a Treasurer

A treasurer may resign, be replaced, or otherwise become incapacitated. If a treasurer wishes to resign, then the individual must submit a written statement of resignation with the appropriate filing repository in order to be relieved from their statutory obligations and liability under the campaign finance laws. If the filing repository is the Commission, the treasurer may either send the resignation letter in the mail or by email to seec@ct.gov, which will be publicly posted on eCRIS. If a chairperson submits an amended registration statement appointing a new treasurer, signed by both the chairperson and the new treasurer, the prior treasurer is also relieved of their duties even if they have not submitted a statement of resignation.

Upon a treasurer's resignation or permanent incapacity, the deputy treasurer, if any, automatically succeeds as "acting" treasurer until a new treasurer is appointed. Where no deputy treasurer has been appointed, the failure to designate a successor treasurer within **ten days** of the resignation or incapacity is a violation of General Statutes § 9-602(c), for which a fine may be imposed against the committee chairperson. Regardless of whether a deputy treasurer has been appointed, it is **strongly recommended** that the committee chairperson formally designate a successor treasurer, whether it be the old deputy treasurer or someone new, by filing an amended registration statement ([SEEC Form 3](#)) with the appropriate filing repository within the ten days.

A political committee may **not** receive any contributions, or make or incur any expenditures during a period in which the committee lacks a treasurer or deputy treasurer. The committee chairperson is legally liable for any such violation and subject to a maximum civil penalty of \$2,000 per violation.

[General Statutes §§ 9-7b, 9-602(a) and (c), 9-607(a) and (d)]



3. Who May Not Be a Treasurer or Deputy Treasurer

An individual who is not a Connecticut elector may not serve as treasurer or deputy treasurer.

In addition, an individual may not serve as treasurer or deputy treasurer of more than one political committee (except an individual may be treasurer or deputy treasurer for a legislative leadership or legislative caucus committee and another political committee). Serving as a treasurer or deputy treasurer qualifies as controlling a political committee and Connecticut's campaign finance laws mandate that no individual may establish or control more than one political committee, as is more fully detailed in Section F of this chapter.

Practically speaking, communicator lobbyists, their immediate families, and their agents may not serve as treasurers for political committees established or controlled by candidates for Governor, Lieutenant Governor, Secretary of the State, Treasurer, State Comptroller, Attorney General, state senator or state representative or for legislative leadership or legislative caucus committees as they are prohibited from bundling contributions for such committees. For more information on who is considered a communicator lobbyist, please see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#).

A person who has not paid civil penalties or forfeitures assessed against them under the campaign finance statutes may not serve as treasurer or deputy treasurer of a political committee. In addition, a person may not serve as treasurer or deputy treasurer if the person has been convicted of or pled guilty or nolo contendere to any felony involving fraud, forgery, larceny, embezzlement or bribery, or any criminal offense under the state election or campaign finance laws unless at least eight years have elapsed from the date of the conviction or plea or the completion of any sentence, whichever date is later, without a subsequent conviction of or plea to another such felony or offense.

[General Statutes §§ 9-601 (27), 9-605(e), 9-606(d), 9-610(i)]



D. Registration Statement Requirements

Important Note: For more information on how to complete the registration statement ([SEEC Form 3](#)), please see the [instructions](#) to the form, available on the Commission's website.

A registration statement must contain the following:

1. The name and address of the committee.
2. The name, address, telephone number, and email address (if applicable) of the committee's chairperson, treasurer, and deputy treasurer (if applicable).
3. The name and address of the depository institution in Connecticut in which a single checking account is established for the committee's funds.
4. The name, address, and title of any other officers (if applicable).
5. Whether the committee is established by two or more individuals, a business entity, a labor union or other organization, or by a legislative leader or caucus.
6. A statement indicating the purpose of the political committee, i.e., whether the committee is established for a single primary, election or referendum – a "durational" political committee – or for ongoing political activities – an "ongoing" political committee.
7. For ongoing political committees, whether it is formed to influence state elections (statewide offices, General Assembly, probate judge), municipal elections (mayor, first selectman, alderperson, board of education, etc.), or both.
8. For political committees formed to support or oppose any referendum question or constitutional amendment in addition to candidates, a brief statement identifying the substance of the referendum question.
9. For durational political committees formed to support a single or multiple candidates, the name and party affiliation of each candidate that the committee supports, and the office sought by each candidate.
10. For political "slate committees," the names of the candidates who established the committee and whose campaigns the slate committee will fund (the committee must fund at least two candidates).

Important Note: For more information on political slate committees serving as the funding source for a slate of candidates, please refer to the Commission's [A Guide for Municipal Candidates](#).

11. If the political committee is established by a business entity, labor union or other organization or association, the name of the entity, union or organization.
12. If the political committee is established by a labor union or other organization, whether it will receive funds from the organization's treasury or from voluntary member contributions.



13. If the entity, union, or organization which established the political committee is a component member of a statewide entity, the name and address of the statewide entity.
14. If the committee is established or controlled by a member of the General Assembly, an elected state officer, or a lobbyist registered with the Office of State Ethics or immediate family member, or any principal of a state contractor, prospective state contractor, or investment services firm, or an agent of any of the above, a statement disclosing that relationship and the name of the member of the General Assembly, elected state officer, lobbyist or principal. Note that there are two types of lobbyists in the State of Connecticut – the individual communicator lobbyists who lobby at the Legislature and the client lobbyists that retain them.
15. If the political committee is formed to support candidates from a particular state legislative district, a statement to that effect and the district number.
16. If the political committee files reports with the Federal Election Commission or any out-of-state agency, a statement to that effect, including the name of the agency.
17. The name and address of the individual, business entity or labor organization making the initial contribution or disbursement to the political committee. If the initial contribution or disbursement precedes the filing of the registration statement, the political committee treasurer must file an itemized campaign finance disclosure statement ([SEEC Form 20](#)) itemizing this transaction along with the registration statement. If the contribution or disbursement is made after the filing of the registration statement, the treasurer must file an itemized statement ([SEEC Form 20](#)) within 48 hours of receiving that initial contribution or disbursement.
18. A designation indicating whether the political committee is authorized to make contributions or expenditures for the benefit of candidates for statewide office and/or General Assembly. **The chairperson may designate only those offices to which the political committee can legally contribute under Connecticut law.**
19. Signed and dated certifications by the chairperson, treasurer, and deputy treasurer (if applicable) of the political committee. (Please note that a special certification applies to political committees which are legislative caucus or leadership committees.)

[General Statutes §§ 9-602(a), 9-605(b)]



E. Biennial Re-Registration

All ongoing political committees registered with the Commission are required to file either a [SEEC Form 3](#) or [SEEC Form 3NC](#) with the Commission by November 15 of every even-numbered year.

A committee may file a [SEEC Form 3NC](#) if there have been no changes, additions, or deletions to the information contained on the committee's most recent [SEEC Form 3](#) on file with the Commission at the time of the biennial filing requirement. It is the treasurer's duty to file the appropriate statement to fulfill the biennial requirement, unless it involves a change in officer, in which case the chairperson must sign the amendment.

The failure to file by the applicable deadline will result in the committee being deemed subject to limitations on making and receiving certain contributions during the legislative session. See [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information about these limitations.

Please keep in mind that the law continues to require political committees to submit an amended registration statement ([SEEC Form 3](#)) to the appropriate filing repository within ten days of any additions or revisions to the information contained in their registration statement.

[General Statutes §§ 9-605(e), 9-610(e) and (f)]

F. "One Person One PAC" Rule

No individual may establish or control more than one political committee.

Several key factors, among many, that could demonstrate that an individual has established or exercises control of a political committee include:

1. Having a significant role in the committee's formation;
2. Serving as chairperson, treasurer, deputy treasurer, or other officer of the committee; and
3. Making the initial contribution to the committee.

Note that this prohibition does not extend to party committees and candidate committees. Accordingly, an individual may serve as the treasurer of both a political committee and a party committee or candidate committee under the law.

A business entity, labor organization, or other person may only establish or control a single political committee. To ensure compliance with this limitation, the business entity, labor organization or other person establishing or controlling a political committee must disclose this affiliation on the committee's registration statement ([SEEC Form 3](#)).

[General Statutes §§ 9-605(e)(1), 9-613(a), 9-614(a); Final Decision 2008-044]

Important Note: While an ongoing political committee and party committee may make joint expenditures and may coordinate expenditures with each other, they must be separate committees. A party committee or ongoing political committee may not form any other political committees. See General Statutes § 9-609(a).



G. Legislative Leadership and Legislative Caucus Committees

The members of the same political party for each chamber of the General Assembly – i.e., Senate Democrats, House Democrats, Senate Republicans, and House Republicans – may each establish one legislative caucus committee. The chairman of each legislative caucus committee must complete a specific certification on the committee's registration statement ([SEEC Form 3](#)).

The six highest-ranking leaders of the General Assembly (Speaker of the House, Majority Leader of the House, Minority Leader of the House, President Pro Tempore of the Senate, Majority Leader of the Senate, Minority Leader of the Senate) may each establish a legislative leadership committee. The minority leaders of the House and Senate may also each have an additional legislative leadership committee. These committees must be designated by the respective legislative leader on the committee registration statement ([SEEC Form 3](#)).

These political committees are exempt from the “One Person One PAC” restriction. Thus, an individual may serve as treasurer of another political committee in addition to serving as treasurer of a legislative leadership or legislative caucus committee.

Legislative leadership and legislative caucus committees can only contribute to and make expenditures benefiting legislative candidates. Candidates participating in the Citizens' Election Program cannot accept contributions from one of these legislative political committees, though these committees may still make organization expenditures on behalf of such candidates, as discussed later in [Chapter VII. Spending Committee Funds](#).

[General Statutes §§ 9-605(e), 9-618(d), 9-619(d)]

H. Political Committees Formed to Support a Single Candidate

A candidate is prohibited from having more than one candidate committee registered as the funding vehicle for their campaign. A candidate who has registered a candidate committee may not establish, authorize, or assist in the establishment of any other committee to promote the candidate's campaign.

Consistent with this prohibition, the chairperson of a political committee **formed solely to support a single candidate** must notify the candidate of the formation of the political committee by certified mail not later than seven days after the political committee is established. If the candidate does not disavow the political committee in writing to their filing repository (the State Elections Enforcement Commission or the town clerk, as the case may be) within fourteen days after receiving such notification, or if the candidate accepts any funds from the political committee, the political committee is automatically deemed to be the candidate's candidate committee. A violation of this prohibition against having two simultaneously existing committees is considered an extremely serious violation of the election laws.

[General Statutes § 9-604(a), (b), and (c)]



I. Political Committees Registered Under Federal Law or in Other States

A political committee registered with the Federal Election Commission under federal law or with another state other than Connecticut may not make coordinated expenditures or contributions to or for the benefit of a Connecticut state or municipal candidate or a Connecticut traditional political committee or party committee. A separate committee must first be registered in Connecticut (by filing a [SEEC Form 3](#), designating a treasurer and a depository institution situated in Connecticut) and then must solicit funds specifically for use in Connecticut campaigns in accordance with Connecticut's campaign finance laws. There is one exception to this strict rule – a national committee of a political party may use its federal account to make contributions to an ongoing political committee.

Treasurers of traditional political committees receiving such contributions from entities not registered as committees in Connecticut must return the contributions immediately to the donor. Treasurers should check with the town clerk and the State Elections Enforcement Commission to determine whether a committee is properly registered to make contributions in Connecticut.

[General Statutes §§ 9-602(a), 9-618(e); Opinion of Counsel 1986-2]

J. Social and Political Clubs

Sometimes, two or more individuals will form a group or club that raises or spends money on diverse things, including (but not limited to) promoting or opposing candidates or referendum questions and promoting or opposing various social or economic issues not related to candidates or political parties. Such groups or clubs need to distinguish between their campaign finance-related funds, which are regulated by the Commission, and their other expenditures, which fall outside of campaign finance law and thus are not regulated by the Commission.

When such groups or clubs formed by two or more individuals acting together wish to make coordinated expenditures or contributions to or for the benefit of a Connecticut state or municipal candidate or a Connecticut political committee or party committee, they must register a traditional political committee ([SEEC Form 3](#)) unless they qualify for the \$1,000 "safe harbor" described earlier. The group or club's political committee must maintain a separate checking account – a "political account" – in a Connecticut financial institution.

If the club or group wishes to engage in social or other activities that do not fall within the lawful purpose of a political committee or are otherwise permitted by Chapter 155, they may **not** do so using the political committee's account. To spend money on such non-campaign finance related activities, the group or club must establish a checking account not associated with the political committee. Funds raised and spent through this non-political account do not need to be disclosed under the campaign finance laws (unless they are being spent on an independent expenditure made directly by the group or club). However, it is recommended the group keep internal records for receipts and expenses made through the non-political account in the event a complaint is filed that it made an impermissible expenditure.



Important Note: In order to avoid making an impermissible expenditure from the political committee account, or to avoid making an expenditure from the non-political committee account that should have been made from its political committee, it is critical to understand the difference between the two accounts. For example, if a social club decides it would like to spend money to raise awareness about an environmental issue, it may not use political committee funds for this purpose but rather should use its non-political committee account. In contrast, if a social club decides it would like to make a contribution to a candidate, it **must** use its political committee funds, since this type of activity is regulated under the campaign finance laws.

With respect to holding events, a club with a political committee should pay for non-political events from the “social account” and political events from the “political account.” The club must also identify which account will receive proceeds of any fundraising event. The non-political account may be used for the deposit of funds received in connection with any fundraising event or drive for a specified non-political purpose. The social or non-political purpose of the event or drive should be made known to all prospective donors to the account. By contrast, the political account may only be used for the deposit of club dues intended for the political committee, contributions for the committee's political activities, and for the payment of the club's general operating or political expenses.

Important Note: The law expressly permits an ongoing political committee to make 501(c)(3) charitable contributions and memorial contributions. Accordingly, such social clubs may make 501(c)(3) charitable contributions or memorial contributions from either their political committee account or their non-political account.

[General Statutes §§ 9-601c, 9-602(a), 9-618(a)]



IV. The Role of the Treasurer

A. Makes and Authorizes Expenditures

Only a committee's designated treasurer (or deputy treasurer, when necessary) may authorize and make contributions or expenditures on the committee's behalf. All committee expenditures **must** be authorized by the treasurer and, generally speaking, must be paid by check or debit card drawn on the committee's checking account or by the committee's credit card. Committee checks must contain the committee's name and address, as well as the name of the committee's treasurer.

If the committee has a credit card, the treasurer and deputy treasurer, if applicable, are generally the only individuals who are authorized cardholders. The treasurer may, however, allow the chairperson or a committee worker to be an authorized cardholder of a credit card issued to the committee, provided that the individual's expenditures are: (1) for goods or services that are pre-authorized by the treasurer; and (2) for a lawful purpose of the committee. The treasurer should be particularly careful in opting to authorize the chairperson or a committee worker as a cardholder as such authorization will mean that all expenditures made by the cardholder on that credit card will be deemed to have been authorized by the treasurer, even if the cardholder failed to obtain actual authorization for a particular expenditure in question.

A chairperson or committee worker may only be an authorized holder of a committee credit card, which is paid on a periodic basis. A debit card, which draws directly from the committee checking account, is treated differently under the law. Committee debit cards may **only** be used by the treasurer (or deputy treasurer, when necessary).

[General Statutes § 9-607(a), (d), (e), (g)(2)(O), (j) and (l)]

B. Deposits All Monetary Receipts

The treasurer must deposit all funds in the committee's single checking account within **twenty days** of receipt.

The treasurer must ensure that any funds received by the committee are lawful and within the aggregate limits permitted under campaign finance law. The treasurer should not deposit any funds that are either prohibited or otherwise exceed the permissible limits set forth by law. Instead, the treasurer should return the contribution to the donor within fourteen days of receipt or by the filing deadline for transactions falling within the reporting period, whichever is earlier.

If the treasurer deposits a monetary receipt that is later deemed impermissible, the treasurer must report it on the financial disclosure statement ([SEEC Form 20](#)) and refund the contribution without delay by returning the amount to the donor using a check drawn on the committee's checking account. The treasurer should report any such refund as an expenditure in Section P of the [SEEC Form 20](#) using the "REF" expenditure code. Whenever possible, such refunds should be made in the same reporting period that the funds were deposited.

[General Statutes §§ 9-606(a), 9-607(g)(2)(R), 9-608(c)]



C. Retains All Records and Receipts

The treasurer must retain internal records to substantiate all expenditures made by the committee as permissible. Examples of expenditure records include, but are not limited to:

- bank statements
- cancelled checks
- bills
- travel itineraries
- invoices
- cash register receipts
- credit card and debit card slips and statements
- written receipts supporting any requests for reimbursement
- copies of ad books for fundraising affairs
- copies of fundraiser tickets
- copies of invitations
- solicitor appointments
- copies of printed advertisements (flyers, postcards, etc.)
- compensation agreements
- documents describing expenditures incurred but not yet paid
- loan agreements
- copies of checks

These internal records must be kept for **four years** from the date of the financial disclosure statement in which the transactions were entered.

[General Statutes §§ 9-606(a), 9-607(f), 9-608(c)(1)]

There are two recordkeeping requirements under the law that are worth highlighting.

First, in all instances where the committee agrees to pay someone more than \$100 for their work or services, there must be a **written agreement** entered into with the individual, as discussed more fully below.

Second, treasurers are required to keep an internal list of all individuals they appoint as **solicitors** for the committee, as discussed more fully below.

For more guidance on the types of information that must be collected and retained, see [Chapter VIII. Reporting Information](#).

D. Maintains Service Agreements

In all instances where the committee agrees to pay an individual more than \$100 for their services, there must be two types of documentation. First, there must be a **written agreement** entered into with the individual, signed **before** any such work or service commences, which sets forth (1) the nature and the duration of the fee arrangement; and (2) a description of the scope of the work to be performed or services to be rendered. Signed agreements, including price sheets and/or emails and other documentation, when read together must demonstrate that the treasurer preapproved in writing the nature and scope of work to be performed, including the tasks and quantities to be charged for and the amount to be charged.

Second, the treasurer must also maintain invoices or other contemporaneous records created when the work was done that detail the services that were actually rendered



and the amount charged. These invoices need to contain enough information to allow the treasurer to know what work was actually done and at what cost before paying.

Important Note: If an agreement will involve, for example, paying a consultant who will be paying other vendors (i.e. secondary payees), the committee will best be served by including in the written agreement a requirement that the consultant disclose any secondary payees to the committee, and any pertinent information relating thereto, so that the committee treasurer can properly disclose such secondary payments, as required by law. See General Statutes § 9-608(c)(1).

Our [sample fee arrangement for work or service](#), available on our website, provides language regarding this requirement for you to use in your contract with a consultant. We also have a [sample reimbursement & secondary payee information sheet](#) for the consultant to provide you when they are seeking reimbursement for an expenditure they made on behalf of the committee.

The consultants paid for the service of ordering or placing advertising on behalf of the committee should provide adequate information to the treasurer for the treasurer to verify the purchases were made and to disclose the secondary payees on the campaign finance filings.

[General Statutes §§ 9-607, 9-608(c)(1); Regulations of Conn. State Agencies § 9-607-1]

E. Files Periodic Financial Disclosure Statements

The treasurer is also obligated to file all financial disclosure statements on behalf of the political committee with the appropriate filing repository. For more information on how and when to submit financial disclosure statements, see [Chapter VIII. Reporting Information](#).

[General Statutes § 9-608a]

F. Appoints and Oversees Solicitors

The only individuals who may receive monetary and non-monetary contributions and donations on behalf of a political committee are the treasurer, deputy treasurer, and solicitors. Anyone other than the treasurer or deputy treasurer who receives funds must be appointed as a solicitor by the treasurer. The treasurer may appoint as many solicitors as needed. The treasurer must keep an accurate list of the name and address of each individual who is appointed to serve as a solicitor. Although the names of solicitors need not be disclosed in the committee's financial disclosure statements, the law requires the treasurer to keep internal records, outlining each solicitor appointment and the term of appointment, which may be subject to audit. The treasurer is responsible for training solicitors and overseeing their activities to make sure they are complying with the law.

A solicitor can never deposit committee funds; only the treasurer can deposit funds received by the committee. Within **seven days** of receipt of any goods, funds, or contributions, the solicitor must deliver the same to the treasurer. The treasurer must deposit funds within **twenty days** of receipt from the solicitor or return impermissible contributions to the contributor(s). A solicitor cannot expend funds that they receive



and must deliver them only to the treasurer in the form received (i.e., cash received from contributors must be delivered in same cash form to the committee's treasurer).

No later than 24 hours prior to the treasurer's required filing date, each solicitor must submit to the treasurer a list of the contributor information (names, addresses, and all other legally required information) of all persons from whom the solicitor collected monetary and/or non-monetary receipts on behalf of the committee. The treasurer must oversee committee solicitors, ensuring that they turn over this list, as well as all contributions received, in a timely manner. The treasurer is also responsible for training and overseeing solicitors to make sure they are complying with the law.

No person can solicit contributions that are prohibited by law.

[General Statutes §§ 9-606(c), 9-622(10)]

G. Limitations on Who May Solicit Contributions

While communicator lobbyists and principals of current and prospective state contractors are no longer completely prohibited from soliciting for certain political committees, some restrictions on their solicitation activities remain:

- Communicator lobbyists, as well as their agents and immediate family members, may not bundle contributions for a political committee established or controlled by a candidate for statewide office or General Assembly, including legislative leadership and legislative caucus committees. "Bundle" is defined as the forwarding of five or more contributions to a single committee by the communicator lobbyist or their immediate family member or agent, or raising contributions for a committee at a fundraising event held, sponsored, or hosted by the communicator lobbyist or their immediate family member or agent.
- Communicator lobbyists, as well as their immediate family members and agents, may not solicit on behalf of a political committee established or controlled by a statewide office or General Assembly candidate from any individual who is a member of the board of directors, an employee of or a partner in, or who has ownership interest of five percent or more in any client lobbyist they represent.
- Communicator and client lobbyists are prohibited from soliciting contributions during legislative session, which includes any regular legislative session and any special sessions or vote-override sessions in odd-numbered years, on behalf of a political committee: (1) established for an assembly or senatorial district; (2) established by, in consultation with, or at the request or suggestion of a General Assembly member or statewide officeholder or their agent; or (3) controlled by a General Assembly member or statewide officeholder or their agent to aid or promote the nomination or election of any candidate or candidates to the General Assembly or statewide office.
- No state contractor or prospective state contractor or principals thereof, with respect to a contract with the executive branch, may knowingly solicit contributions on behalf of a political committee authorized to make contributions or expenditures for the benefit of statewide office candidates from the contractor's employees or one of its subcontractors or the principals of the subcontractor.



- No state contractor or prospective state contractor or principals thereof with respect to a contract with the legislative branch may knowingly solicit contributions on behalf of a political committee authorized to make contributions to, or expenditures for, the benefit of General Assembly candidates from the contractor's employees or one of its subcontractors or the subcontractor's principals.

Note that a political committee may be subject to one or more of these restrictions depending on how it is organized.

[General Statutes §§ 9-601(26), 9-610(e), (h), and (i), 9-612(f)]

The following individuals are prohibited from soliciting contributions from a principal of an investment services firm on behalf of any political committee: the State Treasurer or any candidate for State Treasurer, any agent of any such candidate, the Deputy State Treasurer, any member of the State Investment Advisory Council, and any unclassified employee in the office of the State Treasurer acting on behalf of the State Treasurer or Deputy State Treasurer.

[General Statutes § 9-612(f)]

For more information on the state contractor, lobbyist, and investment services solicitation provisions, please see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds.](#)

Elected statewide officeholders and deputies, as well as members of the General Assembly, may generally solicit for political committees. However, statewide officeholders and General Assembly members, any candidates for such offices, and agents of any such officials or candidates may not knowingly, willfully, or intentionally solicit contributions on behalf of a political committee from a person who they know is prohibited from making contributions, including a principal of a state contractor or prospective state contractor with regard to a state contract solicitation with or from a state agency in their respective branch.

[General Statutes § 9-612(f); Advisory Opinion 1983-2]

Municipal employees may not solicit funds for the benefit of a political committee from an individual under their supervision or that individual's spouse or dependent children.

[General Statutes § 9-622(12)]

No member of the Connecticut Retirement Security Authority board of directors, except the State Comptroller or State Treasurer, or any executive director, assistant executive director or authorized officer appointed by said board or the principal of an entity with a contract with the authority to administer the Connecticut Retirement Security Program may knowingly solicit contributions from the board's or the executive director's or assistant executive director's employees on behalf of a political committee authorized to make contributions or expenditures to or for the benefit of statewide office candidates.

[General Statutes § 31-429]



V. Raising Funds for Your Committee

A political committee may raise funds by collecting contributions. While contributions are often monetary in nature, they may take other forms as well. In addition to contributions which may be subject to limits on the amount that may be given, there are other types of funds or things a committee may receive that do not count toward the contributor's contribution limit in the case of traditional political committees. These few categories are narrowly defined. In most instances, these receipts or "donations" remain reportable.

Political committees may raise funds by holding fundraising events, which include political gatherings sponsored by the committee for which it charges an attendance fee, or tag sales or auctions at which the committee sells items to its invited guests. The issues that most commonly arise concerning a fundraising event are: (1) whether the funds given or received are treated as contributions or as receipts which are not contributions; and (2) how to disclose these types of receipts, if at all, on the committee's financial disclosure statement.

This section provides information regarding permissible and impermissible contributions, other permissible sources of funds for political committees, and the appropriate means by which funds may be collected. For more information on how to report these contributions and receipts, see [Chapter VIII. Reporting Information](#).

A. Contributions

1. Sources and Limits

The following section lays out the contribution limits imposed on traditional political committees based on the type of political committee.

a. Business Entity Political Committees

Permissible Contributions

A traditional political committee established by a business entity may accept contributions subject to the following aggregate limits per contributor per calendar year:

Table 1 - Contribution Limits to Traditional Business Entity Political Committees

CONTRIBUTOR	LIMIT
Individual	\$1,000*
Another Political Committee	\$2,000**
State Central Committee	\$2,500
Town Committee	\$1,500
National Committee of a Political Party	Unlimited***



* Individual must be a United States citizen or a foreign national with permanent status in the United States. If the individual is under eighteen years of age, the limit is \$30 per calendar year. The communicator lobbyist and state contractor contribution provisions may also apply; see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information.

** The donor committee must be registered in Connecticut. Also, contributions from legislative leadership and legislative caucus committees are prohibited.

*** Such contributions must come from the committee's federal account, on file with the Federal Election Commission. The federal account may contain only funds subject to the contribution and disclosure limits prescribed in the Federal Election Campaign Act (i.e., no transfers from "soft money" accounts). Such contributions may also be subject to federal restrictions.

[General Statutes §§ 9-611(e), 9-612, 9-617, 9-618, 9-619; 2 U.S.C. § 441e; 52 U.S.C. § 30121]

A business entity political committee may solicit voluntary contributions from the sponsoring entity's employees through **payroll authorization cards**. The treasurer must retain the completed and signed payroll authorization cards and must obtain new authorizations annually. The contributor must have the right to designate the amount to be contributed and the right to refuse to participate at all without consequences.

If the business entity is, for example, a professional association that collects **dues** from its members (as well as from other sources), it may set up a similar process where a portion of the dues goes to the affiliated political committee as contributions as long as it follows these same guidelines outlined above and can ensure that the dues are being paid by a permissible contributor (i.e. an individual member as opposed to a business entity). In other words, if a member has the ability to pay his dues through use of a business credit card, this would not be permissible.

[Advisory Opinion 1980-3]

Impermissible Contributions

A traditional political committee established by a business entity may **not** receive contributions from the following sources:

- A business entity, except with respect to administrative or fundraising costs from the business entity which established the committee, as is more fully discussed below;
- A labor union or any other organization;
- A candidate committee of a candidate for statewide office or General Assembly;
- A judge of probate or municipal candidate committee, except with respect to surplus distributions, as more fully described later in this chapter;
- A committee of a candidate for federal or out-of-state office;
- A referendum committee, except with respect to surplus distributions, as more fully described later in this chapter;



- A legislative caucus or legislative leadership committee; or
- A political committee or party committee not registered under Connecticut law, except for a national committee of a political party as set forth in the preceding section.

[General Statutes §§ 9-608(e), 9-613(a) and (b), 9-614(a), 9-616(a), 9-618(d) and (e), 9-620(a)]

Transfers from Affiliated Business Entity

A business entity cannot make a contribution to any traditional political committee, including a political committee established by the business entity. However, a business entity may make **reasonable and necessary transfers or disbursements** to or for the benefit of its political committee only if they are:

1. Reasonable and necessary; **and**
2. Directly attributable to either (a) the administrative costs of operating the political committee or (b) the solicitation of funds for the political committee. Such disbursements are reported in Section F, "Amount Transferred from Affiliated Business Treasury," of the [SEEC Form 20](#).

As far as the business entity transferring money to the political committee to assist in its solicitation of funds, the Commission has determined that an amount equal to one-third or less of the proceeds raised by the political committee's solicitation of funds is a reasonable amount for the business entity to spend on the solicitation costs. An amount in excess of one-third of proceeds must be reimbursed by the political committee to the business entity in order to avoid a prohibited contribution.

Disbursements made strictly for administrative operating costs are not subject to the one-third rule but must still be both reasonable and necessary. The committee must retain internal records showing that the disbursements were permissible under the law.

[General Statutes § 9-613(b); Opinion of Counsel 1999-3]

b. Organization Political Committees

Manner of Funding

A traditional political committee established by an organization must designate on its initial registration statement whether it will receive funds exclusively either from the organization's **treasury** or from voluntary contributions made by its **members**. It cannot receive funds from both.

If the organization has elected to fund its political committee through member contributions, the political committee may solicit voluntary contributions from the organization's members through **payroll authorization cards**. The treasurer must retain the completed and signed payroll authorization card and must obtain new authorizations annually. The contributor must have the right to designate the amount to be contributed and the right to refuse to participate at all without consequences.

If the organization is set up to collect **dues** from its members and its political committee is funded through member contributions, the organization may set up a similar process where a portion of the dues goes directly to the affiliated political committee as a



contribution as long as it follows these same guidelines outlined above and can ensure that the dues are being paid by a permissible contributor (i.e. an individual member as opposed to a business entity). In other words, if a member has the ability to pay his dues through use of a business credit card, this would not be permissible.

An organization political committee funded by the organization's treasury may alter its manner of funding after its establishment. To do so, it must first notify the appropriate filing repository in writing of its intent to alter its manner of funding. Within fifteen days of that notification, the treasurer must return any remaining funds in the committee's account to the organization's treasury after satisfying all outstanding debts of the committee. Within seven days of that distribution, the treasurer must file a statement with the filing repository itemizing all distributions and expenditures made in this process. Upon such filing, the committee may begin receiving contributions from members. For ease of reporting, the treasurer should coordinate this changeover process, including these transitional transactions, with the close of a reporting period.

[General Statutes § 9-614; Advisory Opinion 1980-3]

Permissible Contributions

A traditional organization political committee may accept contributions subject to the following aggregate limits per contributor per calendar year:

Table 2 - Contribution Limits to Traditional Organization Political Committees

CONTRIBUTOR	LIMIT
Individual	\$750*
Another Political Committee	\$2,000**

* The political committee may only accept contributions from individuals if the organization has elected to fund the committee through voluntary member contributions. If so, individual contributors must be **members** of the affiliated organization and meet all other qualifications for contributors under federal and state law. To contribute, individual members must be United States citizens or foreign nationals with permanent status in the United States. Individual members under eighteen years of age may contribute a maximum of \$30 in cash per calendar year. The communicator lobbyist and state contractor contribution provisions may also apply; see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information. If the organization has elected to fund its committee through the organization's treasury, then contributions from individuals, including members, are **prohibited**.

** The donor committee must be registered in Connecticut. Also, the committee may not receive contributions from legislative leadership or legislative caucus committees.

[General Statutes §§ 9-611(e), 9-612, 9-614, 9-617, 9-618, 9-619; 2 U.S.C. § 441e; 52 U.S.C. § 30121]



Impermissible Contributions

A traditional political committee established by an organization may not receive contributions from the following sources:

- An individual (if the political committee has elected to be funded exclusively from its organization's treasury funds);
- An individual who is not a member of the organization;
- A labor union or any other organization, except that a political committee that has opted to be funded exclusively from its own organization's treasury may accept funds from the organization that established the committee;
- A business entity;
- A party committee (town or state central);
- A national committee of a political party;
- A candidate committee of a candidate for statewide office or General Assembly;
- A judge of probate or municipal candidate committee, except with respect to surplus distributions, as more fully described later in this chapter;
- A committee of a candidate for federal or out-of-state office;
- A referendum committee;
- A legislative caucus or legislative leadership committee; or
- A political committee not registered under Connecticut law.

[General Statutes §§ 9-608(e), 9-613(a), 9-614(a), 9-616(a), 9-618(d) and (e), 9-620(a)]

Transfers from Affiliated Organization

Monetary and non-monetary receipts may only be accepted from the organization that established the committee if: (1) the committee has elected to be financed exclusively from the organization's treasury funds; and (2) the chairperson of the committee has properly designated such method of funds on its registration statement. Such transfers are reported in Section G, "Amount Transferred from Affiliated Labor Union or Other Organization Treasury," of the [SEEC Form 20](#).

[General Statutes § 9-614]

c. Two or More Individual Political Committees

Permissible Contributions

A traditional political committee established by two or more individuals may accept contributions subject to the following aggregate limits per contributor per calendar year:



Table 3 - Contribution Limits to Traditional Two or More Individual Political Committees

CONTRIBUTOR	LIMIT
Individual	\$1,000*
Another Political Committee	\$2,000**
State Central Committee	\$2,500
Town Committee	\$1,500
National Committee of a Political Party	Unlimited***

* Individual must be a United States citizen or a foreign national with permanent status in the United States. If the individual is under eighteen years of age, the limit is \$30 per calendar year. The communicator lobbyist and state contractor contribution provisions may also apply; see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information.

** The donor committee must be registered in Connecticut. Also, contributions from legislative leadership and legislative caucus committees are prohibited.

*** Such contributions must come from the committee's federal account, on file with the Federal Election Commission. The federal account may contain only funds subject to the contribution and disclosure limits prescribed in the Federal Election Campaign Act (i.e., no transfers from "soft money" accounts). Such contributions may also be subject to federal restrictions.

[General Statutes §§ 9-611 (e), 9-612, 9-617, 9-618, 9-619; 2 U.S.C. § 441e; 52 U.S.C. § 30121]

Impermissible Contributions

A traditional political committee established by two or more individuals may not receive contributions from the following sources:

- A business entity;
- A labor union or any other organization;
- A candidate committee of a candidate for statewide office or General Assembly;
- A judge of probate or municipal candidate committee, except with respect to surplus distributions, as more fully described later in this chapter;
- A committee of a candidate for federal or out-of-state office;
- A referendum committee, except with respect to surplus distributions, as more fully described later in this chapter;



- A legislative caucus or legislative leadership committee; or
- A political committee or party committee not registered under Connecticut law, except for a national committee of a political party as set forth in the preceding section.

[General Statutes §§ 9-608(e), 9-613(a) and (b), 9-614(a), 9-616(a), 9-618(d) and (e), 9-620(a)]

d. Political Committees Established for a Single Election or Primary (including Political “State Committees”)

Permissible Contributions

A traditional political committee established for a single election or primary may accept contributions subject to the following aggregate limits per contributor per calendar year:

Table 4 - Contribution Limits to Traditional Single Election or Primary Political Committees

CONTRIBUTOR	LIMIT
Individual	\$1,000*
Another Political Committee	\$2,000**
State Central Committee	\$2,500
Town Committee	\$1,500

* Individual must be a United States citizen or a foreign national with permanent status in the United States. If the individual is under eighteen years of age, the limit is \$30 per calendar year. The communicator lobbyist and state contractor contribution provisions may also apply; see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information.

** The donor committee must be registered in Connecticut. Also, contributions from legislative leadership and legislative caucus committees are prohibited.

[General Statutes §§ 9-611(e), 9-612, 9-617, 9-618, 9-619; 2 U.S.C. § 441e; 52 U.S.C. § 30121]

Impermissible Contributions

A traditional political committee established for a single election or primary may not receive contributions from the following sources:

- A business entity or any other type of entity;
- A labor union or any other organization;
- A candidate committee of a candidate for statewide office or General Assembly;



- A municipal or judge of probate candidate committee, except with respect to surplus distributions, as is more fully described later in this chapter;
- A committee of a candidate for federal or out-of-state office;
- A referendum committee, except with respect to surplus distributions, as is more fully described later in this chapter;
- A national committee of a political party;
- A legislative caucus or legislative leadership committee; and
- A political committee or party committee not registered under Connecticut law.

[General Statutes §§ 9-608(e), 9-613(a) and (b), 9-614(a), 9-616(a), 9-618, 9-619, 9-620(a)]

2. Contributor Certification Forms

Treasurers are required to report contributions the committee has received, as discussed more fully in [Chapter VIII. Reporting Information](#). Political committees authorized to spend funds on statewide or General Assembly candidates are required to obtain contributor certification forms from their contributors for contributions in excess of \$50 in the aggregate. Even if a political committee is not required by law to obtain a contributor certification form given the type of political committee or the amount of the contribution, a treasurer can best protect themselves by having each contributor complete and sign a contributor certification form for every contribution regardless of the amount. **The Commission highly recommends that all political committees obtain contributor certification forms for all contributions regardless of amount.**

Treasurers are not required to obtain and keep more than one certification form for each contributor, unless information certified to by the contributor (other than the amount contributed) changes. However, if the information has changed and the treasurer has not obtained a new certification, the old certification will **not** act to protect the treasurer against liability. The Commission strongly recommends that the treasurer obtain a new certification form with every contribution.

Your contributor certification form should contain the following:

- Contributor's full name;
- Contribution amount;
- Method of contribution;
- Residential address of contributor;
- Contributor's phone number and/or email address;
- Contributor's age (individuals under eighteen years old may only contribute up to \$30);
- Name of employer (required if individual's aggregate contributions to the committee exceed \$50 in the aggregate);
- Principal occupation (required if individual's aggregate contributions to the committee exceed \$100 in the aggregate);



- Statement as to whether the individual is a lobbyist, or the immediate family member of a lobbyist (required if individual's aggregate contributions to the committee exceed \$50);
- Statement as to whether contributor is a principal of a state contractor or prospective state contractor (which includes spouse and dependent children over eighteen) if the committee is authorized to make contributions or expenditures to or for the benefit of any candidate seeking office in the branch of government with which the contractor or prospective state contractor is doing or seeking to do business and if contributor's aggregate contributions to the committee exceed \$50 (best practice is to obtain it at all amounts);
- Certification that the information disclosed by the contributor on the form is true and accurate to the best of his knowledge;
- Certification that the contributor is either a United States citizen or a foreign national with permanent resident status in the United States;
- Certification that the contribution is being made from the contributor's personal funds, is not being reimbursed in any manner, is not being made as a loan, and is not an otherwise prohibited contribution.

The relevant definitions necessary to explain the requested certifications must also be provided.

Commission staff can provide committees with sample contributor certification forms. Please contact the Compliance Unit at 860-256-2940 and we can send you a sample form based on your specific registration.

[General Statutes § 9-608(c)(3)]

3. "In-Kind" Contributions

The above-mentioned contribution limits and restrictions apply to all contributions, whether monetary or in-kind. An in-kind contribution is the donation of goods, services or anything of value given free of charge or at a discount (i.e., at less than the usual and normal charge) to the recipient committee. An in-kind contribution is valued at the usual and normal charge less any amount paid by the recipient committee and must be disclosed on the committee's financial disclosure statement (in Section M of [SEEC Form 20](#)). Treasurers should obtain contributor certification forms for in-kind contributions as well, following the same parameters set forth in the previous section.

Uncompensated services provided by an individual who **volunteers** their personal time to a committee is not an in-kind contribution and need not be reported. However, services that are provided by an individual for which that individual receives compensation from another committee, individual, or any other entity, must be reported as an in-kind contribution, and are subject to source and amount restrictions. If an individual provides their services at a discount not available to all others on the same terms, the amount of the discount is a contribution. Moreover, if the volunteer provides things of value to the campaign as part of their volunteer service that are not otherwise exempt from the definition of contribution, then the individual must either be reimbursed for such items or the committee can report the items as an in-kind contribution, if within the appropriate limits.



Example of an In-Kind Contribution: Susan (she/her) enjoys designing websites and has decided to volunteer her personal time and services to create and maintain a website for XYZ political committee, using her own personal computer. However, the cost of hosting the committee website and purchasing a domain name will total \$100. While Susan is permitted to use her own personal computer and provide her personal time and computer skills as part of her volunteer services, either the political committee can reimburse her for the cost of the site hosting and domain name or that cost must be reported as an in-kind contribution from her to the political committee.

4. Loans as Contributions

Loans that are not made in the ordinary course of business by a bank are considered contributions. In the case of a traditional political committee, loans are subject to the overall limit on contributions to the committee. For example, the sum of an individual's contributions and loans to a traditional political committee established by a business entity cannot exceed \$1,000 in a calendar year. The amount of the contribution is equivalent to the principal amount of the outstanding loan. An unpaid loan, when added to other contributions from the same contributor, may not exceed the contribution limit applicable to that contributor. Repayments made on the loan reduce the amount of the contribution. Once repaid in full, a loan no longer counts against the contributor's contribution limit.

The committee treasurer and the individual or entity making the loan must execute a **written agreement**, and the treasurer must retain a copy of the agreement for the same period as other internal records. Loans are reported in Section E of the [SEEC Form 20](#).

[General Statutes §§ 9-601a(a)(1) and (b)(1), 9-608(c)(1)(E)]

5. Contributions in False Name

No person may make a payment or contribution to a treasurer in another person's name other than the name of the true donor or payor, nor may any treasurer knowingly receive such a payment or contribution. A treasurer is prohibited from entering the name of someone other than the true donor or payor on the committee's financial disclosure statement.

[General Statutes § 9-622(7)]

B. Other Sources of Funds – Donations & Funds Not Considered Contributions

The most common way by which traditional political committees raise funds is receiving contributions from permissible sources. In addition, traditional political committees may accept certain monetary and non-monetary receipts which are not considered contributions under the law. The following is a list of the most significant types of such receipts. Some of these categories must still be reported and where appropriate, we provide information regarding how to report them. For more information on reporting, see [Chapter VIII. Reporting Information](#). Treasurers must be mindful that these exemptions are **narrow**, and each receipt constitutes a "contribution" unless it squarely falls within one of the narrowly defined exemptions.



[General Statutes § 9-601a(b)]

1. Reportable Receipts

The following types of receipts are reportable even though they are not considered contributions. Once the limit imposed by a given exemption is exceeded, the entire receipt must be reported as an itemized contribution (if permissible) in Section B, “Itemized Contributions from Individuals” of [SEEC Form 20](#).

a. Certain Items of Personal Property Donated by an Individual for a Committee Fundraiser

An **individual** may donate an item or items of personal property to a committee for a fundraising event or may purchase such item or items at the event and not have it counted as a contribution, provided the aggregate amount of the donation or purchase does not exceed **\$100**.

For donations, report in Part II of [SEEC Form 20](#), under Section L4, “In-Kind Donations Not Considered Contributions.” For purchases, treasurers are no longer required to report the names of individuals who purchase an item or items at a fundraising event if the cumulative amount purchased by the individual does not exceed \$100. Such fundraiser purchases are reported in lump sum in Section L1, “Event Information,” for the filing period.

[General Statutes §§ 9-601a(b)(9), 9-608(c)(1)]

Important Note: The full amount of a monetary receipt for an item purchased at a fundraising event is reported and is not reduced by the value of the item (e.g., price paid for a television purchased at a committee sponsored tag sale is not diminished by the fair market value of the television).

EXAMPLE A: Jane Doe (she/her) donates six commemorative plates to a political committee to be sold at a tag sale, and the value of each plate is \$10, for a total of \$60. This non-monetary receipt is not a contribution but must be reported in Section L4 as an in-kind donation from Jane.

EXAMPLE B: June Smith (she/her) buys one of the commemorative plates at the tag sale for \$10. This is a donation not considered a contribution because her overall purchase does not exceed \$100. The political committee does not have to itemize June’s purchase but rather may aggregate the \$10 with any other purchases not considered contributions at the event and report that lump sum in subpart 1 of Section L1 without disclosing the individual names of June or any other such purchasers.

EXAMPLE C: John Smith (he/his) buys the remaining five commemorative plates at the tag sale for \$10 each, for a total of \$50, as well as a table for \$60. He has made a \$110 contribution because the purchase price is over \$100. This monetary receipt constitutes a \$110 contribution from John Smith that is counted against his contribution limit to the committee and must be separately itemized in Section B of [SEEC Form 20](#).



b. Certain Business Entity Donations

Generally, political committees must pay fair market value when purchasing goods or services. Donations and discounts from a business entity would be considered an in-kind contribution from an impermissible source. There are, however, two narrow exceptions to this prohibition.

A business entity (e.g., a restaurant) may sell to a political committee food or beverage at a discount as long as the charge is not less than the cost to the business entity and the cumulative value of the discount given is not more than **\$600** with respect to any calendar year. These discounts are not considered in-kind contributions because of this exception and are reported in Part II of [SEEC Form 20](#) in Section L4, "In-Kind Donations Not Considered Contributions."

[General Statutes § 9-601a(b)(6)]

Second, the donation by a business entity of goods or services for a fundraising event may also be permissible if the aggregate value of the goods or services does not exceed **\$200**. These items would also be reported in Section L4 as in-kind donations not considered contributions.

Please note that a business entity may **only** donate goods or services that it sells or provides as part of its business. A business entity may not purchase goods for a fundraiser or provide funds to a committee with which to buy goods under this exception. If the value of the goods or services provided **exceeds** \$200, then the entire amount is a **prohibited business entity contribution**.

EXAMPLE D: ABC Corporation, a printing company, donates free printing services to a committee for a fundraising picnic worth \$150 in value. This non-monetary receipt is not a contribution but must be reported as an "in-kind donation" in Section L4. Note that ABC Corporation would not be able to donate \$150 worth of pizza for the picnic because it is not in the business of selling pizza.

EXAMPLE E: The same corporation donates an **additional** \$100 worth of printing to the fundraising affair. It has made a prohibited contribution because the value of the printing – now at \$250 for this event – exceeds \$200 and therefore this exemption does not apply. The in-kind contribution cannot be accepted and must either be returned immediately by the treasurer or purchased from ABC Corporation.

[General Statutes § 9-601a(b)(12)]

Note that, as described more fully earlier in this chapter, a business entity may also make **reasonable and necessary transfers or disbursements** to or for the benefit of its affiliated business entity political committee for administrative costs or the solicitation of funds subject to certain restrictions.

c. Ad Purchases

Another exception to an impermissible business contribution is a business entity's purchase of advertising space in a program for, or on signs at, a fundraising affair held by a political committee (other than an exploratory committee) if the purchase price for the space does not exceed **\$250** in the calendar year. Other persons can avail themselves of this exception, although they are limited to ad purchases of up to **\$50**.

