



*The 2017 Municipal Campaign Finance Filing
Pilot Program – A Study of the Efficiency of
Transferring Campaign Finance Filing Duties
from the Town Clerks to the
State Elections Enforcement Commission*

*A Report of the
Connecticut State Elections
Enforcement Commission*

Issued February 2019

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I. INTRODUCTION

In June 2015, the Connecticut General Assembly passed, and Governor Dannel Malloy signed, Special Act No. 15-14: *An Act Establishing A Pilot Program for Municipal Campaign Finance Filings*, which authorized the State Elections Enforcement Commission (the “Commission”) to establish a pilot program to provide assistance to the town clerks of up to 20 municipalities with the completion of some or all of their filing repository duties prescribed by General Statutes § 9-603.

The Special Act required the Commission to develop an application process and criteria for the selection of the municipalities. Participation in the pilot program was purely voluntary and a town clerk was only permitted to apply to participate in the program if directed by the town’s legislative body. The program was implemented for the 2017 municipal election cycle and terminated on April 6, 2018.

Special Act 15-14 also mandated that the Commission conduct a study of the efficiency of transferring some or all of the filing duties of the participating municipalities to the Commission. The study was to include an analysis of (1) the cost to municipalities of maintaining the filing repository function, including, but not limited to, costs associated with personnel, equipment, software, hardware and server space; and (2) the capacity of their offices to assist with centralized filing repository duties, including, but not limited to, the availability of personnel and equipment. Per the Special Act, the Commission was to report its findings and any recommendations for legislation to make the pilot program a permanent program.

This report contains the Commission’s findings under the aforementioned study, describes the parameters of the program implemented by the Commission, analyzes the benefits and drawbacks to making the pilot program permanent for all towns, and makes recommendations on whether to make the pilot program permanent and how to do so effectively if the legislature chooses to implement a permanent program.

II. PILOT PROGRAM’S 2017 RUN

A. Application and Selection Process

On July 30, 2015, Commission staff sent an email to all town clerks informing them of the passage of the pilot program legislation and inviting them to respond by August 24, 2015 if their municipality would be potentially interested in participating in the program. Commission staff was also present at the semi-annual Town Clerks Conference held on September 24, 2015 and received verbal responses of interest from town clerks in attendance.

Staff ultimately received responses from 71 of the 169 municipalities. In answering the question of whether their municipality was potentially interested in the pilot program, 38 responded “Yes,” 13 responded “Maybe,” and 20 responded “No.”

Because a maximum of 20 municipalities were permitted to participate the program and each municipality was required to obtain approval from their legislative bodies before applying, the Commission invited all 51 municipalities that replied “Yes” or “Maybe” to apply to the program.

The application consisted of supplying proof of a resolution passed by at least a majority of its legislative body signifying its consent to participate in the program and answers to questions concerning the following information:

1. The municipality's population;
2. The municipality's form of government;
3. The municipality's location/county;
4. Whether the municipality's elections take place in May or November;
5. Number of offices on the municipality's 2013 and 2015 general election ballots and number of candidates per office;
6. Number of offices having primaries in the municipality in 2011, 2013, and 2015;
7. Number of referenda held in the municipality in the past five years;
8. Whether the municipality has had any minor parties run candidates in the past five years;
9. The town clerk office's standard hours of operation and availability to be open until 5 p.m. on filing deadlines; and
10. The town clerk office's technology capabilities – fax / internet / scanning accessibility.

Staff sent out applications to each municipality on December 4, 2015. The deadline to submit the completed application was February 16, 2016, with the Commission selecting the participants at its March 9, 2016 meeting.

The Commission received 21 applications in total. Of the 21 applications, only one town – Durham – was unable to obtain legislative body approval by the time the application was due. The remaining 20 municipalities submitted complete applications, including documentation of legislative body approval.

The Commission approved the 20 applicants to participate in the program with Durham serving as an alternative pending legislative body approval.¹ The 20 participating towns were as follows: Cheshire, Colchester, East Haddam, East Haven, Hamden, Killingworth, Manchester, Meriden, Middletown, Monroe, New Britain, New Hartford, Norwich, Pomfret, Scotland, Simsbury, Stonington, Trumbull, West Hartford, and Westport.

¹ The 20 chosen municipalities were able to complete their involvement in the Pilot Program and therefore Durham did not ultimately participate.

Municipality	Population (2010 census)	Form of Government	County	Municipal Election Date
New Britain	73,206	Mayor-council	Hartford	November
West Hartford	63,268	Council-manager	Hartford	November
Hamden	60,960	Mayor-council	New Haven	November
Meriden	60,868	Council-manager	New Haven	November
Manchester	58,241	Council-manager	Hartford	November
Middletown	47,648	Mayor-council	Middlesex	November
Norwich	40,493	Council-manager	New London	November
Trumbull	36,018	Mayor-council	Fairfield	November
Cheshire	29,261	Council-manager	New Haven	November
East Haven	29,257	Mayor-council	New Haven	November
Westport	26,391	Representative town meeting	Fairfield	November
Simsbury	23,511	Town meeting	Hartford	November
Monroe	19,479	Town meeting	Fairfield	November
Stonington	18,545	Town meeting	New London	November
Colchester	16,068	Town meeting	New London	November
East Haddam	9,126	Town meeting	Middlesex	November
Durham	7,388	Town meeting	Middlesex	November
New Hartford	6,970	Town meeting	Litchfield	November
Killingworth	6,525	Town meeting	Middlesex	November
Pomfret	4,247	Town meeting	Windham	November
Scotland	1,726	Town meeting	Windham	November

B. Preparing for the Program

In the spring of 2016, Commission staff visited the town clerk offices of several of the participating municipalities to get a sense of their layout, available technology, etc. Typically, the town clerk made available the personnel in charge of their technology so Commission staff could confirm that the office was properly equipped. All 20 participating towns had the requisite technology – i.e., the ability to scan and email or fax filings to the Commission’s offices as well

as public internet access for candidates and treasurers who wanted to file electronically but did not otherwise have a computer or internet access available.

In December 2016 and January 2017, Commission staff reached out to the 20 participating town clerks to welcome them to the program and provide them with basic direction on how the program would work. Specifically, they were provided with a handout on the town clerk's responsibilities under the program (SCHEDULE A) as well as a handout to distribute to candidates and treasurers that described their responsibilities as participants in the program (SCHEDULE B). The latter handout was also made available on the Commission's website on a page dedicated to participating pilot program towns.

The Commission's electronic Campaign Reporting Information System, eCRIS, was also revised to be used for municipal candidates and their committees. The reporting system had to be updated to include fields particular to municipal candidates and committees and to activate the appropriate warnings given that they have some different contribution and expenditure restrictions. The eCRIS search page also had to be revised so that the public could search for filings based on a candidate or committee's town or municipal office sought.

C. Implementation of the Program

As described in greater detail in the town clerk and candidate handouts, all candidates were required to register by completing a registration statement, which they were able to do on the Commission's electronic filing system, eCRIS, or by mailing it or hand delivering it to the Commission's office. They also had the option of mailing it or hand-delivering the registration to their town clerk's office. Staff at the town clerk's office would then email the registration to the Commission in order to hasten its posting, and subsequently send the original in the mail to the Commission. For committees, financial disclosure statements were submitted by similar methods.

For those candidates and committees that submitted their registration statements and financial disclosure statements by paper, significant Commission staff resources were required to data enter these filings into eCRIS in order that they could be posted and searchable by the public.

D. Program Results and Analysis

The Commission received 770 candidate registrations from the 20 participating towns – 262 candidates registered electronically while the remaining 508 registered on paper. Of these 770 candidates, 90 registered candidate committees and 82 of these candidate committees filed their financial disclosure statements electronically. The remaining 680 candidates filed exemptions from forming a candidate committee, either because they were self-financing, not intending to spend or receive over \$1,000, or were being funded by a town committee or a slate committee. There were 12 slate committees formed across the 20 towns, 11 of which filed their disclosure statements electronically, and one other political committee that filed electronically as well. The breakdown in timeliness of disclosure filings was as follows:

Filing Due	Number of Committees Required to File	Number of Committees that were Late or Failed to File	Percentage of Timely Filers
April 2017 Quarterly	8	0	100%
July 2017 Quarterly	26	0	100%
October 2017 Quarterly	100	4 late	96%
7 th Day Preceding Election	99	4 late	96%
January 2018 Quarterly	62	0	100%
April 2018 Termination	62	0	100%

In a survey conducted by Commission staff, 100 percent of the participating town clerks said that transferring the campaign finance filings to the Commission would free up their office staff’s time to tend to other matters, with 60 percent of the clerks indicating that it would reduce overall costs spent in their office on processing campaign finance filings and would result in overall fiscal savings. Sixty-seven percent of the town clerks said that based on the feedback they received, their constituents liked using the Commission as their filing repository and 73 percent of the clerks indicated their constituents liked using eCRIS and found it relatively easy to use. All of the town clerks surveyed support the Commission becoming the permanent repository for all campaign finance filings for all towns and would want to remain in the pilot program if it continued.

Cheshire Town Clerk Laura Brennan also distributed a survey to the 20 participating town clerks and, along with Town Clerks J. Stacey Yarborough, Sheila Sedlack, and Michael Smart, prepared a report on the program for the Connecticut Town Clerks’ Association (SCHEDULE C). The town clerks’ responses to that survey also indicated a generally positive experience and enthusiasm for the program. There were a few concerns expressed about the program – treasurers who were not comfortable using eCRIS, the cumbersome nature of having to send the original filings in the mail after having sent them by email, confusion over which officer of a committee needed to do what and in what order to register the committee through eCRIS, and the frantic process of having to register within ten days of being nominated. These concerns seem to be far outweighed by the positive feedback received about the program. The town clerks liked that the Commission handled filing reminders and late filings, taking the burden off the town clerks, that all filings were viewable to the public on the Commission’s website, and that it saved their office time and space.

Commission staff maintained a list of issues that arose during the program. First, there were some instances in which the Commission was not given materials submitted to the town clerk’s office in a timely manner – such as registrations, financial disclosure filings, endorsement letters, petition approval letters, etc. This problem could be alleviated by increased training of town clerks and, in the case of missing registrations or disclosure statements, having Commission staff check in with town clerks to make sure they do not have the filings before reaching out to the candidate or treasurer and initiating for a failure to file timely. Requiring registration and disclosure statements filed on paper to be filed directly with the Commission would also vastly improve this issue. In the case of a late endorsement letter or petitioning paperwork received by the Commission’s office, a solution would be to give candidates ten days to register from the date the Commission received the letter from the town clerk rather than the date the endorsement

or petitioning paperwork was received by the town clerk's office as the trigger for the ten-day window. The Commission could clarify this through official guidance.

There were also a number of instances where the candidate would register as being funded by a town committee or political slate committee but then not list that committee's name, which is required disclosure. In such cases, Commission staff would call them and fill in the answer they gave verbally over the phone. However, ideally, this should be something to which the candidate certifies at the time of filing. Requiring electronic registration and making this a required field on eCRIS would alleviate this problem. However, a related problem arose for candidates electronically registering as being funded by a political slate committee but not being able to select that committee because it had not yet been registered. In order for this to work, the slate committee will have to be registered before any of the candidates register. In most cases, this can be accomplished but there may be instances where candidates are endorsed and want to register but the chairperson and treasurer of the slate committee are not able to complete their paperwork to register the slate committee before those candidates attempt to register.

There was also one participating town in which there were nonpartisan elections and candidates were put on the ballot not because of party endorsements but because they indicated they wanted to run again when asked by the town clerk. Commission staff worked with this town clerk to have her forward the incumbents' responses as they came in so there was something definitive from which to start the ten day window to register. This interaction would have to continue if the pilot program were to become permanent.

Finally, Commission staff also had some difficulty reading endorsement paperwork and reaching endorsees in a timely manner. While some endorsements were typed and easily legible, others were handwritten and, in some cases, illegible. Although most endorsed candidates registered without needing to be contacted, outreach was needed in some cases which sometimes proved difficult given that only their addresses were available. It would therefore be helpful for the law to require that candidates provide their phone numbers and email addresses on these endorsement forms so that they can be easily contacted.

III. ANALYSIS

While minor issues did arise during the program's run, it was largely successful and showed a strong indication that having municipalities file at the state level is worthwhile. First, it would allow them to file electronically through eCRIS. eCRIS is an invaluable tool because: (1) calculations required by law are system-generated, including aggregates for contributions and expenditures, thereby reducing potential errors by treasurers in completing their disclosure statements; (2) treasurers can make amendments to previously filed registration or disclosure statements quickly and efficiently; and (3) treasurers can upload campaign finance data into eCRIS from Excel and other campaign management software applications using eCRIS's online interface. Having the Commission serve as the filing repository for municipal candidates and committees would also mean that the automated systems available at the state level to monitor the timeliness of filings could be utilized for municipal filings as well, saving the town clerks time and money from having to handle that responsibility. Finally, and perhaps most importantly, if the Commission served as the repository for municipal candidates and committees, that would mean that all of their filings could be viewed by the public on any

computer at any time from anywhere in the world with an internet connection, vastly increasing transparency and disclosure.

Moving all filings to the Commission would also save money at the local level by reducing the unfunded mandates put on towns to serve as the filing repository, which requires personnel time, equipment, software, and server and storage space purchases and maintenance that are not insignificant. The 20 participating towns also gave a strong indication that town clerk offices have not only the capacity and ability but the interest and enthusiasm to assist Commission staff with the shifting of these filing duties to the Commission's offices.

The Commission would support the pilot program being made permanent and to include all 169 towns and cities in the state. Because this would involve so many more candidates and committees than the Commission's current base, this expansion would require the following:

1. **Mandatory electronic registration for all candidates and committees (SEEC Form 1 and either 1A or 1B, SEEC Form 3, SEEC Form 4, SEEC Form 8).** Given the large number of candidates at the municipal level, electronic registration must be required. Note that it is currently not required of candidates and committees registering at the state level but could and should be as well.
2. **Mandatory electronic filing of disclosure statements.** Committees that file at the state level are currently required to file electronically if they have spent, received, or incurred \$1,000 or more in the election cycle (in the case of candidate committees), \$1,000 or more in the current calendar year (in the case of slate committees), or \$1,000 or more in the current calendar year or prior regular election cycle (in the case of ongoing committees). Because of the high volume of municipal committees that would be filing with the Commission, the statutes must be modified to require that all filings done on the long form disclosure statement be filed electronically regardless of financial activity. If the committee has not reached the \$1,000 threshold and does not want to file electronically, it can always opt to file on paper on the short form disclosure statement.
3. **Requiring all municipal filings submitted by paper to be filed directly with the Commission.** Under the pilot program, candidates were permitted to send in or drop off their filings with the town clerk's office which then required the office to both email copies to the Commission and send the originals in the mail to the Commission. By requiring paper filers to submit their filings directly with the Commission, either by mailing them or delivering them by hand, this would further alleviate the strain put on the town clerk offices and also improve the immediacy in which filings can be posted for public viewing.
4. **Requiring more informative endorsement paperwork.** Modifying the statutes to require endorsement paperwork to include the phone number and email address of the endorsed candidate is vital for bringing all filings to the Commission, as it ensures we can contact them expeditiously.²

² Currently, the relevant statute, General Statutes § 9-390, only requires the candidate's name and street address and the title of the office for which he or she was endorsed.

5. **A phasing in of towns into the program.** In 2021, the Commission would recommend having 85 towns in the program, including the 20 towns that participated in the pilot program, and the remaining 84 towns join in 2023. Such a phase-in approach is necessary for the Commission to adapt its procedures and ensure that proper staff resources are available to perform the necessary tasks, given the substantial number of candidates in the 169 towns all registering and filing disclosure statements within such short periods of time.

6. **Hiring of additional Commission staff.** Because of the increased workload that would be coming to the Commission, it must be able to hire at least the following staff members in 2020: (1) one elections officer; and (2) one information technology analyst. An elections officer will be needed to assist with the processing of a substantial influx of paperwork that will come in to the Commission and to help with the increasing numbers of questions that will come from the regulated community as they learn that the Commission is not only where they now file but to whom is best suited to direct their campaign finance questions. An information technology analyst will also be crucial as we expand mandatory electronic filing to be used by a far greater number of candidates and committees than we have previously had. Modifications to the number of required additional staff may be needed as the towns are added.

IV. CONCLUSION

The Commission supports the legislature extending the pilot program to be permanent for all 169 towns and cities, phasing them in over two municipal election cycles. The Commission further advises that in order to accomplish this, there must be mandatory electronic filing for all candidate registrations and all long form disclosure statements filed by municipal candidate committees, slate committees, and political committees, and all forms must be submitted directly to the Commission. Finally, modifications would have to be made to the endorsement paperwork requirements as laid out in General Statutes § 9-399 and the Commission would need to be authorized to hire additional Commission staff due to the migration of work from the local to the state level.

V. ACKNOWLEDGEMENTS

The Commission gratefully acknowledges the 20 town clerks, as well as their staff members, and the candidates and treasurers from those towns that participated in the pilot program. The Commission also acknowledges its many staff members who were instrumental in the implementation of the program.

APPENDICES

Schedule A – Town Clerk Responsibilities – Municipal Campaign Finance Filing Pilot Program
(prepared by Commission staff)

Schedule B – Candidate Responsibilities – Municipal Campaign Finance Filing Pilot Program
(prepared by Commission staff)

Schedule C – Annual Report of the State Elections Enforcement Commission Liaison
Committee to the Connecticut Town Clerks Association (prepared by Town Clerks Laura
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2017 MUNICIPAL CAMPAIGN FINANCE FILING PILOT PROGRAM

TOWN CLERK RESPONSIBILITIES

Thank you for participating in the Municipal Campaign Finance Filing Pilot Program! If the program is successful, we anticipate the State will become the filing repository for all 169 municipalities. By participating in the Pilot Program, you will be able to provide us with valuable feedback about your personal experiences which will help us shape the permanent statutory landscape. Below is a summary of what your responsibilities will be under the Program.

NOTE: The Pilot Program concerns only campaign finance registration and disclosure statements as regulated by the State Elections Enforcement Commission. The Program does not impact candidate ballot access paperwork, which will continue to be filed with the town clerk or Secretary of the State's Office, as appropriate.

TRANSMISSIONS GENERALLY:

Your office will be required to transmit various documents to us electronically – preferably by email. If you have scanning abilities, please scan and PDF the documents to us by email to SEEC.towns@ct.gov. If you do not have a scanner but have a fax machine, you can fax the documents to 860-622-4926.

DOCUMENTATION TRIGGERING CANDIDATE REGISTRATION:

Once you receive **certificates of endorsements** from the Democratic and Republican town committees, please date stamp them and then promptly send a copy to SEEC electronically. The ten day window to register as a candidate starts when the certificates are submitted to your office so time is of the essence. See File No. 2015-181. Once SEEC receives the certificate of endorsement, we will issue letters requesting that they register within ten days of the date your office received the certificate. You have no obligation to remind candidates of the need to register but if you would like to do so as a courtesy because that has been your practice, you may continue to do so. *Please note that original certificates of endorsement should stay at your office as this is not a campaign finance document but under the purview of the Secretary of the State's Office.*

If the candidate has forced a primary by virtue of petitioning, then they have ten days to register once the **primary petitions** have been certified by the registrar of voters and received by the town clerk's office. When this has occurred, please promptly send us documentation electronically, including the date the primary petition was certified.

If a **minor party** submits a list of nominated candidates, please promptly send the list to our office by electronic means.

Finally, if a person submits a **nominating petition** to run as a petitioning candidate or under a new party name for the general election, please promptly send documentation to our office electronically once the petition has been certified, including the date the nominating petition was certified.

If you receive any paperwork regarding **withdrawals** or **replacement candidates**, please promptly send the pertinent documentation to us by electronic means.

In the subject of your email, please be sure to include the name of your town and a description of what the email contains.

EXAMPLE: West Hartford – DTC Endorsements

Like certificates of endorsement, the originals of all of these aforementioned documents should stay at your office since these are not campaign finance documents but under the purview of the Secretary of the State's Office.

CANDIDATE REGISTRATIONS:

Within ten days of obtaining ballot access (i.e. either certificate of endorsement is submitted to your office by a town committee, a list of nominated candidates is submitted to your office by a minor party, or the person's primary or nominating petition has been certified), candidates will need to complete the SEEC Form 1 along with either the SEEC Form 1A to form a candidate committee or a SEEC Form 1B which exempts them from forming a candidate committee. General Statutes § 9-604 (a) & (b). Again, our office will perform the outreach to let the candidates know they need to register – you are welcome, but not required, to notify them as well. In some cases, candidates will register before they obtain ballot access which, as you know, is permissible.

Candidates will be permitted and should be encouraged to file their registrations electronically through eCRIS!

It saves time and resources at both the town and state levels as there will be no costs associated with transferring filings to our office from your office or any time spent on your end transferring the filings (which is further expanded upon below). It also saves our agency from having to data enter the registrations as eCRIS does that automatically for us. Moreover, candidates filing by eCRIS can complete the registration with relative ease in the comfort of their own homes. **Please help us by encouraging all candidates and treasurers to file by eCRIS.**

For those candidates who are not willing to file their registrations by eCRIS, they can mail or hand deliver a paper registration to our office. They are also permitted to submit them to your office but given that there is an added cost borne by the town to forward registrations received at your office, **you should encourage candidates filing by paper to mail or hand deliver their registrations directly to our office.**

For registrations filed at your office, however, they are deemed to be filed on the day they are received by your office in the case of hand delivery or the date of the postmark in the case of mailings, so please date stamp them and then promptly send them to us electronically, including a scanned copy of the postmarked envelope in the case of a mailed filing, ideally by the end of business day. In the subject of the email, please include the name of your municipality, the last name of the candidate, and the form type.

EXAMPLE: New Britain – Fields – Form 1/1A

Because SEEC is the filing repository for all candidate registrations under the Program, you will then have to mail the originals to our office, along with the envelopes in the case of mailed filings, so we can maintain the originals. Please send them within seven to ten calendar days of receiving them. You are welcome to send them in bulk along with any other type of campaign finance statements you receive and can give it a more general subject in that situation (i.e., New Britain – registration statements received May 1 – 15, 2017). Keep in mind that you will always have access to all of the filings since they will be available on eCRIS for public viewing.

SLATE COMMITTEE AND OTHER DURATIONAL POLITICAL COMMITTEE REGISTRATIONS:

If there is a group of candidates running together who wish to form a slate committee to be their funding source or a durational political committee would like to form for a 2017 municipal election, the group will need to file a SEEC Form 3 to register the committee and in the case of a slate committee, each candidate must file a SEEC Form 1/1B as well. General Statutes §§ 9-602 (a), 9-604 (b). In the case of an exploratory committee, the candidate would submit a SEEC Form 4. These forms should be submitted directly to our office. They are

permitted to submit it to your office, however, so if you receive one, please follow the same protocols as you would for a candidate registration – (1) date stamp it; (2) electronically submit to SEEC; and (3) mail it to SEEC within seven to ten calendar days. In the case of a mailed registration, include the postmarked envelope in your electronic and mailed transmissions. In the subject of the email, please include the name of your municipality, the committee name, and the form type.

EXAMPLE: Middletown – Citizens for Middletown – Form 3

DISCLOSURE STATEMENTS:

If a candidate forms a candidate committee or joins a slate of candidates being funded by a town committee or a newly formed political slate committee, financial disclosure statements must be filed. Other durational political committees must file disclosure statements as well. General Statutes § 9-608.

Town committees have always filed with SEEC so nothing will change for them. General Statutes § 9-603 (a).

For candidate committees, slate committees, exploratory committees, and other durational political committees, their disclosure statements will now be submitted to SEEC. They will be able to file electronically using our eCRIS system which you should strongly encourage. They are also permitted to file by paper which they should send directly to us and should be encouraged to do so (as discussed above), but they are allowed to submit to you. Please follow the same protocols outlined above if they file with you – (1) date stamp it; (2) electronically submit to SEEC; and (3) mail it to SEEC within seven to ten calendar days. In the case of a mailed disclosure statement, include the postmarked envelope in your electronic and mailed transmissions. In the subject of the email, please include the name of your municipality, the name of the committee, the form type, and the type of report (January, April, July, or October quarterly, the seventh day preceding the primary or election, etc.).

EXAMPLES: Middletown – Citizens for Middletown – Form 20 – January Quarterly

Stonington – Smith for Selectman – Form 21 – 7th Day Preceding Primary

You are welcome to send them in bulk along with any other type of campaign finance statements you receive and can give it a more general subject in that situation (i.e., Killingworth – July Quarterlies).

ONGOING POLITICAL COMMITTEES:

If your municipality has any ongoing political committees, we would like them to begin filing with our office starting after the January quarterly filing – in most cases, their first filing with us would be the April 2017 quarterly filing. Please send us an email letting us know of their existence and a copy of their most recent registration statement – the original statement can stay at your office for the time being. Please follow the same submission protocols outlined above if they mail or hand deliver any of their disclosure statements during 2017 but encourage them to begin filing by eCRIS.

REFERENDA:

If your municipality has a referendum and a referendum committee would like to form, they will be filing their registration statement (SEEC Form 8) and disclosure statements (SEEC Form 40) with our office. Again, they are permitted to submit their paperwork to you but you need to follow the above-mentioned protocols. Please let us know the date of the referendum if it is not clear from their paperwork so that we can prepare a filing calendar for their committee. If you have documentation showing that the municipality has officially set the date for the referendum, that would be helpful to include.

Individuals acting alone who spend over \$1,000 on a referendum, as well as entities and any other person other than a referendum committee, will also be filing their disclosure statements (SEEC Form 26) with our office –

initially a SEEC Form 26 – LONG potentially followed by one or more SEEC Form 26 – SHORT. General Statutes § 9-601d. Any such individuals should be directed to call our office so we can go over filing deadlines with them.

INDEPENDENT EXPENDITURE FILINGS:

If any independent expenditure political committees forms with you, they will file a registration statement (SEEC Form 8) and disclosure statements (SEEC Form 40) like a referendum committee. Similarly, individuals and entities acting alone and all persons other than a committee that spend over \$1,000 on an independent expenditure in a municipal race must file disclosure statements (SEEC Form 26) – both LONG and potentially SHORT forms. General Statutes § 9-601d. Please call our office if you have any such committees and groups and we will go over everything in greater detail.

THANK YOU FOR YOUR PARTICIPATION!

If you have any questions throughout the Program, please email SEEC.towns@ct.gov or call 860.256.2940 and ask to speak with Lindsey or Sheri-Lyn.

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CANDIDATES AND TREASURERS IN MUNICIPALITIES PARTICIPATING IN THE 2017 MUNICIPAL CAMPAIGN FINANCE FILING PILOT PROGRAM

Your municipality has been selected to participate in the 2017 Municipal Campaign Finance Filing Pilot Program under which the State Elections Enforcement Commission will serve as the filing repository for all candidate campaign finance filings for the 2017 election year. If the program is successful, we anticipate the State will become the repository of campaign finance filings for all 169 municipalities. Thus, by participating in the Pilot Program, your town will be able to provide us with valuable feedback about your personal experiences which will help us shape the permanent statutory landscape. Below is a summary of how you should proceed in fulfilling your filing duties within the Program.

NOTE: The Pilot Program concerns only campaign finance registration and disclosure statements as regulated by the State Elections Enforcement Commission. The Program does not impact candidate ballot access paperwork, which will continue to be filed with the town clerk or Secretary of the State's Office, as appropriate.

A NOTE ON ECRIS

We are very excited that municipal candidates will be able to submit all filings through our Electronic Campaign Report Information System (eCRIS). eCRIS allows you to submit your candidate registration quickly and easily by computer from the comfort of your own home. For candidates who will be registering candidate committees or joining a political slate committee, these committees will be able to file all of the required disclosure statements through eCRIS as well. eCRIS is especially useful for treasurers because it provides helpful compliance prompts and warnings, tracks donors' aggregate contributions, allows you to file up until 11:59 pm on the date the filing is due, and stores contributor and vendor information so you can easily access them for future filings. eCRIS also saves you time and the expense of mailing or delivering your registration and disclosure statements. Moreover, it offers tremendous savings for both your town and the state. At the state level, we are required to data enter all filings but this work is done automatically when campaigns use eCRIS. ***Please use eCRIS!***

For candidates and committees who do not have computer access, you still have the option to file by mail or by hand delivery.

METHODS OF SUBMISSION

All candidates must register their candidacies and their funding source within ten days of becoming a candidate. General Statutes § 9-604. If you have questions about when you have become a candidate and/or the options you have for funding your campaign, please see our [Municipal Election Campaign Overview](#), available on our website. You may submit your registration through the following methods:

1. eCRIS

As discussed above, ***eCRIS is the preferred method of filing.*** Once you have created an eCRIS account, you can easily log in and create, complete and file your applicable registration statement (SEEC FORM 1/1A/1B) all electronically. For candidates joining slate committees as their funding source or forming an exploratory committee, the committee's registration (SEEC Form 3 (slate committees) and 4 (exploratory committees)) can

be completed electronically as well. All committees can create, complete and file their financial disclosure statements (SEEC Form 20 or 21) through eCRIS as well. For filings with deadlines, candidates and committees filing by eCRIS have until 11:59 pm to file on the date the filing is due.

By using eCRIS, you will be provided with instant verification that the Commission has received your statement and thus that you have satisfied your filing requirement. You won't have to worry about it getting delayed or lost in the mail and you won't have to go through the effort of driving to our office or the town clerk's office to hand deliver it.

For detailed instructions on how to quickly and easily create an eCRIS account, including screen shots, please refer to our instruction manual at <https://seec.ct.gov/eCrisHome/news/CreateUserAccount.pdf> or simply visit our website and click on "Sign Up for eCRIS account" on our eCRIS homepage. You can also contact our eCRIS helpdesk at 860.256.2930.

2. Mail

If filing by paper, you may download and print the applicable [registration statement](#) (SEEC Forms 1/1A/1B, 3, and 4) and/or [financial disclosure statement](#) (SEEC Form 20 or 21), complete it, and then mail your filing to:

State Elections Enforcement Commission
Attn: Campaign Audit and Disclosure Unit
20 Trinity Street
Hartford, CT 06106-1628

In the case of a filing due by a certain date, the filing must be postmarked before midnight on or before the deadline date. You are permitted to mail your filing to your town clerk's office. If you do so, they will date stamp it and forward it to our office along with the postmarked envelope. However, given that the original must be filed with our office, we request that you mail them directly to us in order to alleviate the costs of transferring it. *Again, we encourage you to use eCRIS rather than submit paper filings.*

3. In Person

If hand delivering your filing, you may download and print the applicable [registration statement](#) (SEEC Forms 1/1A/1B, 3, and 4) and/or [financial disclosure statement](#) (SEEC Form 20 or 21), complete it, and then drop off your mailing at the State Elections Enforcement Commission at 20 Trinity Street, Hartford, CT 06106-1628. Our reception area is open to the public from 8:30 am to 5:00 pm Monday through Friday. In the case of a filing due by a certain date, it must be received before 5:00 pm on the deadline date.

If you hand deliver your filing to your town clerk's office, they will date stamp it and forward it to our offices. In the case of a filing due by a certain deadline, it must be delivered before the close of the town clerk office's business hours. Whether you are timely will be based on the date stamp of either office so if you choose to hand deliver it to your town clerk's office, it will be considered filed on the date you drop it off there. However, given that the original must be filed with our office, we request that you drop it off at our office if you are nearby or send it in the mail directly to us in order to alleviate the costs of transferring it. *Again, we encourage you to use eCRIS rather than submit paper filings.*

CONTACT US

If you have any questions about filings or any questions at all, please do not hesitate to contact us. We are here to assist candidates and committees at all levels. If your question is related to filing by eCRIS, please call our eCRIS Helpdesk at 860.256.2930. For all other questions, please call our main number at 860.256.2940.

Connecticut Town Clerks Association, Inc.

State Elections Enforcement Commission (SEEC)

Liaison Committee

Annual Report March 2018

The State Elections Enforcement Commission (SEEC) serves as an impartial arbiter of election complaints, and issues decisions in the areas of campaign finance, election administration and campaign disclosure reporting. The SEEC has the authority to investigate possible violations of election laws, inspect campaign finance records, refer evidence of violations to the Chief State's Attorney, and make recommendations to the General Assembly concerning revisions to the state's election laws.

In 2015, the SEEC invited Town Clerks to apply for a pilot program that would change the procedure of filing financial disclosure forms of candidates in the 2017 Municipal Election. 20 Connecticut Towns participated in the Electronic Campaign Reporting System (eCRIS). The goal for this reporting system for candidates, political and party committees, is to increase transparency in the financing of political campaigns.

The program proved to be very successful according to SEEC. They received over 750 candidate registrations from the participating towns. Only one candidate failed to register after being noticed.

With the program, SEEC became responsible for candidates financial reports and reminding them of deadlines. The staff at SEEC provided assistance and was very helpful throughout the process. Town Clerks have reported mostly positive experiences. All were pleased it took the pressure to make sure candidates filed in a timely manner off them. Most candidates were able to file easily, although some were intimidated, the candidates and treasurers were able to get through it with a little help. One town reported a treasurer thought it should not be so complicated to file expenditures. Candidates also liked the ability to view opposing candidate's filings online. Town Clerks found this program extremely effective, and would like to see this successful program continue.

Note from SEEC to Town Clerks:

The Commission staff would like to thank the twenty town clerks, and their staff members, who participated in our Pilot Program. Everyone was a pleasure to work with, providing us with what we needed and with valuable opinions on successes of and improvements to the process. We will begin our formal analysis of the Program later on this year in preparation for the report we have due to the legislature in February 2019. We will definitely incorporate the town clerk feedback included in this report and look forward to continue to work with you all as we finalize our analysis and recommendations.

~Michael J. Brandi, Executive Director, Lindsey P. Leung, Staff Attorney, Sheri-Lyn Lagueux, Elections Officer~

Respectfully submitted,
Laura Brennan, Chair
J. Stacey Yarbrough
Sheila Sedlack
Michael Smart