Resolution and Order to Accept Public Comment

Pursuant to General Statutes § 4-176, on its own motion, the State Elections Enforcement Commission (the "Commission") hereby determines that a declaratory ruling is necessary regarding whether payments made through digital wallets[1] may be accepted as contributions as defined by General Statutes §§ 9-601a and used as a qualifying contribution as defined by General Statute § 9-704. Specifically, the Commission proposes to treat digital wallet contributions in the same manner as check and credit card contributions.

At its regular meeting on August 20, 2025, the Commission voted to initiate this declaratory ruling proceeding. Public comments are invited for the next thirty (30) days, with written submissions due no later than five o'clock pm. on **Monday, September 22, 2025**. A public hearing will be conducted after the close of the public comment period, if requested, by no later than **Monday, September 22, 2025**.

The public is asked to provide commentary and information regarding:

1) The feasibility of using digital wallet transactions for campaign contributions;
2) The feasibility of using credit cards, bank accounts, and application account balances by digital wallet transactions for campaign contributions, excluding use of gift cards, cryptocurrency, and coupons;
3) The feasibility and possible mechanisms for collecting the requisite campaign certifications when accepting a digital wallet transaction for campaign contributions; and
4) The feasibility and possible mechanisms for detecting fraud and straw contributions when using digital wallet transactions for campaign contributions;

Written comments should be submitted to the following:

Email: seec.compliance@ct.gov. Please include the following in the Subject Line : 'Proposed Declaratory Ruling re: Digital Wallet Contributions'

Or by mail to:
State Elections Enforcement Commission
Legal Compliance Unit
55 Farmington Avenue, 8th Floor
Hartford, CT 06105

Dated: August 22, 2025

[1] As defined by General Statutes § 53a-128a (d) "Digital wallet" means a software application that is used on a computer or other device, including, but not limited to, a mobile device, to store digital forms of one or more payment cards that may be used to obtain money, goods, services or anything else of value.