

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint by
Valerie Friedman, Washington Depot

File No. 2008-033

FINDINGS AND CONCLUSIONS

The Complainant brought this complaint pursuant to Connecticut General Statutes § 9-7b and alleged various filing insufficiencies and attribution violations by three related political committees all named S.O.S. Save Our Schools.

After an investigation of the complaint, the Commission makes the following findings and conclusions:

1. In March of 2008, the Complainant filed the instant complaint and asked the Commission to review “mistakes in elections reporting of Save Our Schools (SOS) political committee” that the Complainant alleges were made by Jennifer Iannucci, Karen Mullen, Nancy Hawley in from 2006 through July of 2007. The Complainant stated that she felt “obligated” to bring the instant Complaint because Jennifer Iannucci “has been so detailed in her criticism of [the Complainant’s] filings.” Notably, prior to the filing of this Complaint Ms. Iannucci had filed a separate complaint which identified the Complainant as a potential respondent.
2. According to filings with the Bridgewater, Roxbury, and Washington Town Clerks’ offices, S.O.S. Save Our Schools was first registered as a durational (single referendum) political committee in January of 2006. Jennifer Iannucci was designated as chairperson of that committee and Karen Mullen was designated treasurer.
3. The Complainant alleges that Ms. Iannucci and Ms. Mullen each made mistakes with respect to that committee’s filings. For example, the Complainant alleges that five of that committee’s 2006 *Statements of Receipts and Expenditures* (SEEC Form ED-45) contained mistakes and/or omissions. In addition, she alleges that, while the committee’s *Certificate of Exemption from Forming a Political Committee for a Referendum Question* (SEEC Form B-5) and *Statement of Organization* (SEEC Form ED-47) were filed timely in one municipality, it was not filed timely in two others.
4. Commission staff has carefully inspected each and every filing mentioned in the Complaint and has found that while a number of the mistakes alleged in the Complaint did in fact occur, those mistakes were not egregious and were ultimately corrected prior to the filing of the Complaint via amendments to the relevant filings, which the Complainant admits in her Complaint. Furthermore, with respect to the alleged untimely filings, the evidence reveals that the committee’s *Certificate of Exemption from Forming a Political Committee for a Referendum Question* (SEEC Form B-5) and *Statement of Organization* (SEEC Form ED-47) were filed timely in one municipality, but not in two others. Ms. Iannucci maintains that she simply misunderstood the law and, once she became aware of her error, she provided those filings to the requisite municipalities.

5. In addition, there is no evidence that those mistakes were committed in an effort to deceive the public or were otherwise made in bad faith. Finally, that committee terminated in August of 2006 and Jennifer Iannucci and Karen Mullen are no longer respectively chairperson and treasurer of the new S.O.S. Save Our Schools political committee.
6. As such, the Commission will take no further action with respect to the mistakes identified in the Complaint.
7. The Complainant further stated that eight mailings of that committee failed to include the proper attribution. General Statutes § 9-333w (Rev.2006; now § 9-621) prohibited a committee from making an expenditure for any printed communication unless that communication included the words "paid for by" and the name of the committee and the committee treasurer. Ms. Iannucci and Ms. Hawley admit that those mailings did not include the proper attribution however, they maintain that those communications did include the committee's name and clearly identified that the committee funded those mailings. Respondents also maintain that they subsequently complied and will continue to comply with the applicable attribution requirements.
8. The Commission finds that several, although not all, of the communications provided by the Complainant do fall within the scope of General Statutes § 9-333w (Rev.2006; now § 9-621) but fail to include the proper attribution. The Commission notes, however, that the committee can be identified as the sponsor of those mailings. Furthermore, the committee on whose behalf the expenditures for those mailings were made terminated in August of 2006 and Karen Mullen no longer acts as a treasurer of the new S.O.S. Save Our Schools political committee.
9. As a consequence, the Commission declines to take further action with respect to those mailings.
10. In April of 2007, another durational (single referendum) political committee named S.O.S. Save Our Schools was registered. Shannon Tredennick was designated chairperson and Nancy L. Hawley was designated treasurer. Then, in May of 2007, that *Political Committee Registration* (SEEC Form 3) was amended to identify the committee as an on-going political committee established for municipal elections only.
11. The Complainant alleges that three of that committee's 2007 *Itemized Campaign Finance Disclosure Statements* (SEEC Form 20) contained mistakes and/or omissions. In addition, she alleges that, the initial filing by that committee was untimely.
12. Commission staff has carefully inspected each and every filing mentioned in the Complaint and has found that while a number of the mistakes alleged in the Complaint did in fact occur, those mistakes were not egregious and were ultimately corrected prior to the filing of the Complaint via amendments to the relevant filings, which the Complainant admits in her Complaint. With respect to the untimely filing, Ms. Hawley was a first time treasurer and misunderstood when that filing was due and, as such, made that filing shortly after it was due. In addition, there is no

evidence that those mistakes identified by the Complainant were committed in an effort to deceive the public or were otherwise made in bad faith.

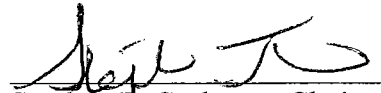
13. As such, the Commission will take no further action with respect to those mistakes.
14. Finally, the Commission notes that since the filing of the Complaint neither Ms. Iannucci, Ms. Mullen, nor Ms. Hawley have been found by the Commission to have committed similar errors or otherwise violated any campaign finance laws.

ORDER

The following Order is recommended on the basis of the aforementioned findings:

That no further action be taken.

Adopted this 17th day of November, 2010 at Hartford, Connecticut.



Stephen F. Cashman, Chairperson
By Order of the Commission