

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

Complaints of Linda Schofield, et al., Simsbury

File No. 2008-079

FINDINGS AND CONCLUSIONS

Complainant, Linda Schofield, the incumbent State Representative candidate for the 16th Assembly District in the November 2008 election and resident of Simsbury, Connecticut filed a complaint with the Commission pursuant to General Statutes § 9-7b, and asserts that her opponent Deborah Noble, the Working Families Party candidate for the 16th Assembly District, and several of her campaign workers violated state election laws in the following ways: 1) by circulating nominating petitions that would allow her to qualify for the Citizens' Election Program under false pretenses in violation of Connecticut General Statutes § 9-368c; 2) that Ms. Noble failed to form a candidate committee in the time prescribed by law; and 3) that Ms. Noble exceeded her statutorily prescribed expenditure limit in the "pre-grant period;" and 4) that Ms. Noble received unlawful contributions and/or organization expenditures from the Working Families Party Committee. In addition, in separately filed complaints, Complainants Israel Gordon, Zalman Nakhimovsky, Alan Needham, and David Ryan filed complaints that mirror Complainant Scofield's allegation that nominating petitions were circulated under false pretenses in violation of Connecticut General Statutes § 9-368c. Also, the additional Complainants allege that one of the petition circulators was not a Connecticut resident as required by law and that the information being passed out on Ms. Noble's behalf did not contain the proper attribution. The aforementioned complaints were consolidated and are addressed herein.

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

1. Deborah Noble is the current treasurer of the Working Families party committee (herinafter "WFP"). In the spring of 2008, Ms. Noble began to consider running for State Representative of the 16th Assembly District as the candidate of the Working Families Party.
2. Ms. Noble was aware that the Working Families Party had ballot status for the 16th District by virtue of the prior election results where their candidate achieved over 1% of the vote. She was interested in seeking the WFP nomination and in pursuing public financing for her campaign. However, the only way for Ms. Noble to qualify for public financing was to make the required filings with the SEEC, circulate nominating petitions issued by the Office of the Secretary of the State, and collect the requisite amount of signatures and qualifying contributions.

3. The Commission has declared that candidates in Ms. Noble's position could qualify for public financing using nominating petitions approved by the Secretary of the State pursuant to General Statutes § 9-453o. See SEEC Declaratory Ruling 2008-1, *Citizens' Election Program: Use of Nominating Petitions for Grant Eligibility* (citing Official Opinion of the Office of the Secretary of the State ("SOTS") entitled *Validity of Nominating Petition to Gain Ballot Access for Existing Minor Parties* (May 22, 2008) which states that the SOTS will issue nominating petitions to minor party candidates whose party already has obtained ballot access for the office sought, when the minor party candidate wishes to use the nominating petitions for purposes of qualifying for public financing even though that nominating petition "may not be valid for the purposes of gaining ballot access.")
4. On May 16, 2008, Ms. Noble submitted to the Office of the Secretary of the State an Application for Nominating Petitions.
5. On May 19, 2008, the Commission received Ms. Noble's Exploratory Committee Registration Statement (SEEC Form 4). That committee was named "Working Families for Simsbury" and Sharon Chmielecki was designated as treasurer. After May 19, 2008, individuals began circulating nominating petitions on behalf of Ms. Noble.
6. It is alleged that Ms. Noble and others circulated petitions on her behalf under false pretenses in violation of Connecticut General Statutes § 9-368c.
7. General Statutes § 9-368c provides as follows:
 - (a) No person shall intentionally misrepresent the contents of a petition circulated under title 9.
 - (b) Any person who violates any provision of this section shall be guilty of a class D felony.
8. Complainants maintain that the petition circulators misrepresented the contents of the petitions when they informed people that the petitions would help Ms. Noble attain ballot status.
9. The Commission finds, however, that the petitions in question were entitled "Nominating Petitions for Candidate for State Representative" and state that "[w]e do hereby petition that, at this election, there be placed on the voting machine ballot labels to be used in each town in said District the name of the above individual as candidate for the office shown above and under the party designation shown (if any)," despite the fact that in this instance they were not utilized for ballot access but for qualifying for public funds, pursuant to General Statutes §§ 9-702, 9-705 and 9-706.
10. As such, even if the Commission assumes that the facts alleged by the Complainant are true, those facts do not amount to a violation of General Statutes § 9-368c since the circulators are alleged to have represented exactly what was provided on the petitions. In

fact, to represent otherwise, given the actual contents of the petition, may have met the elements of General Statutes § 9-368c.

11. The Commission also notes that it does not have civil penalty authority over violations of General Statutes § 9-368c, and the penalties contained therein are criminal.

12. It is also alleged that one of the petition circulators was not a Connecticut resident.

13. General Statutes § 9-453e provides in pertinent part as follows:

Each circulator of a nominating petition page shall be a . . . resident of a town in this state

14. The Commission has not uncovered any evidence to support this allegation and the Complainants have not supplied any.

15. It is further alleged that Ms. Noble failed to form a candidate committee in the time prescribed by law.

16. General Statutes § 9-604 (c) provides as follows in relevant part;

“[I]n the case of a candidate establishing an exploratory committee for purposes including aiding or promoting the candidate's candidacy for nomination or election to the General Assembly . . . the candidate **shall form a single candidate committee not later than fifteen days after the date that the campaign treasurer of such exploratory committee is required to file a notice of intent to dissolve the committee under subsection (f) of section 9-608.**” [Emphasis added.]

17. On July 16, 2008, Ms. Noble registered a candidate committee with the Commission. Pursuant to § 9-604 (c), in order to determine if that filing was untimely, the Commission must first determine the date that Ms. Chmielecki was required to file the notice of intent to dissolve the Working Families for Simsbury Exploratory Committee.

18. General Statutes § 9-608 (f) provides in relevant part as follows:

“[T]he campaign treasurer of the [exploratory] committee shall file such notice of intent to dissolve the [exploratory] committee not later than fifteen days after the earlier of: (1) The candidate's declaration of intent to seek nomination or election to a particular public office, (2) the candidate's endorsement at a convention, caucus or town committee meeting”

19. Ms. Noble received the Working Families Party nomination on July 10, 2008 and that nomination was filed with the Office of the Secretary of the State on July 26, 2008.

20. If, however, the Commission concludes that Ms. Noble made a declaration of intent to seek nomination or election to a particular public office earlier than July 10, 2008, then

the date of that declaration is the date from which she had 15 days to register her candidate committee with the Commission.

21. The statutes do not expressly define when a candidate has declared his or her intention to seek nomination or election to a particular office. In addition, the Commission has not rendered any final decisions applying that phrase to facts like those presented in this case.
22. On April 8, 2009, the Commission did, however, issue SEEC Declaratory Ruling 2009-01, *Public Declarations by Candidates in Exploratory Committees*. Notably, that Ruling was issued long after the activities at issue in this case occurred.
23. In that Ruling, the Commission defined a public declaration of a candidate's intention to seek a particular office as "an announcement made to a wide audience within the state or relevant community that the candidate seeks nomination or election to a specific office." Id., 4. The Commission further stated that there is no clear bright line test for when such declaration has been made. Id.
24. The Commission stated that a two prong analysis is required. A determination that a "declaration" was made and a determination that that declaration was "public." With respect to the "public" prong of the analysis, the Commission stated, *inter alia*, that "[t]he term 'public' refers to communications and actions directed to or intended for the general public, those people with whom it will be necessary for the candidate to communicate in order to win election to public office." Id. The Commission further stated:

"[E]xploratory committees serve an important purpose by allowing candidates to determine whether or not they have enough support to have a realistic chance to obtain the party's nomination to office or public support to obtain a spot on the ballot. In doing so, a candidate must be able to effectively communicate with the individuals whose support he or she needs in order to determine whether the candidacy is viable enough to secure such nomination. Therefore, in this context, the term "public" does not include communications made to endorsing authorities, which will decide whether the candidate receives his party's nomination, or potential endorsing authorities such as town committee members, elected and appointed town officials and party chairpersons. In the case of a candidate who must petition for access to the ballot, a public declaration shall not be deemed to include communications to those who are asked to sign the petitions." Id.

25. In determining whether a "declaration" has been made, the Commission stated that it would consider whether a reasonable person would believe that the candidate's actions were "indicative that the candidate is actually seeking election to public office." Id., 4-5. The Commission cautioned that "**any written . . . statement made or authorized to be made by the candidate who intends to remain properly in exploratory committee must not refer to the candidate for office.**" [Emphasis added] Id., 5. See also *In the Matter of a Complaint by Christopher Healy*, File No. 2009-075 (applying the principles articulated in the above-referenced declaratory ruling concerning public declarations and exploratory committee dissolution).

26. In the present matter, Ms. Noble elected to file with the Commission an Affidavit of Intent to Abide by Expenditure Limits and Other CEP Program Requirements (SEEC FORM CEP 10) on May 22, 2008. The Commission notes that the filing of that Affidavit on that particular date was within Ms. Noble's discretion rather than a statutory requirement. The Commission further notes that in that Affidavit, Ms. Noble, inter alia, identified herself as a candidate who sought the office of State Representative of the 16th District and certified that she had not "made expenditures in excess of the expenditure limits applicable to **the office [she] is seeking . . .**" [Emphasis added.] Upon filing, that Affidavit was available to any member of the public upon request and accessible to the public via the Commission's website.
27. The Commission concludes that a reasonable person would believe that in filing that Affidavit and providing the aforementioned information and certifications, Ms. Noble's actions were indicative that Ms. Noble was actually seeking election to State Representative for the 16th District. As such, the Commission concludes that that Affidavit qualified as a "declaration."
28. Furthermore, the Commission concludes that that "declaration" was "public" since the Affidavit was filed as a public record in a state agency and was available to any member of the public upon request or via the Commission's website.
29. The Commission therefore concludes that the Affidavit of Intent to Abide qualified as Ms. Noble's "declaration of intent to seek nomination or election to a particular public office" for the purposes of General Statutes § 9-608 (f).
30. In light of the foregoing conclusion, the Commission need not decide whether Ms. Noble declared her intent to seek the office of State Representative for the 16th District on May 21, 2008 by distributing flyers to residents of Simsbury or leaving them in the doorways of homes of individuals residing there "VOTE Deb Noble for State Rep." and "I'm running for State Representative in Simsbury" and "I hope you'll support my campaign for State Rep." because the very next day Ms. Noble filed the aforementioned Affidavit.
31. As a consequence, Ms. Chmielecki was required to file the Notice of Intent to Dissolve Working Families for Simsbury exploratory committee on or before June 6, 2008. Because that Notice was not filed until July 16, 2008, however, the Commission further concludes that Ms. Chmielecki violated General Statutes § 9-608 (f).
32. As noted, General Statutes § 9-604 (c) provides that "in the case of a candidate establishing an exploratory committee for purposes including aiding or promoting the candidate's candidacy for nomination or election to the General Assembly . . . the candidate shall form a single candidate committee not later than fifteen days after the date that the campaign treasurer of such exploratory committee is required to file a notice of intent to dissolve the committee under subsection (f) of section 9-608."

33. Here, Ms. Noble was required to form her candidate committee on or before June 21, 2008, but instead, did not file it until July 16, 2008. Ms. Noble asserts that she believed that she did not declare her intention to seek nomination or election to State Representative for District 16 prior to her July 10th nomination by the Working Families Party and thus, was in compliance with the law. She also believed the Affidavit of Intent to Abide was required. Nevertheless, Ms. Noble violated General Statutes § 9-608 (f) by failing to register her candidate committee in the time prescribed.
34. The Commission declines, however, to take further action against Ms. Chmielecki or Ms. Noble for said violations given the novelty and complexity of the “public declaration” issue, Ms. Noble’s good faith belief that she did not declare her intention to seek nomination or election to State Representative for the 16th District prior to her July 10th nomination by the Working Families Party, and the complete lack of evidence that Ms. Chmielecki or Ms. Noble intentionally violated General Statutes §§ 9-604 (c) or 9-608 (f). Had Ms. Noble been correct, neither she nor Ms. Chmielecki would have violated the aforementioned provisions.
35. The Complainants also allege that Ms. Noble exceeded her statutorily prescribed expenditure limit prior to the time her grant application was approved by the Commission on October 15, 2008. This allegation also raises the issue of whether Ms. Noble’s committee failed to return the value of an in-kind contribution made to it by the Working Families Party Committee.
36. General Statutes § 9-702 (c) provides the applicable expenditure limit. It states in relevant part as follows:
- A candidate participating in the Citizens' Election Program shall limit the expenditures of the candidate's **candidate committee** (A) *before* a primary campaign and a *general election campaign*, to the amount of qualifying contributions permitted in section 9-705 and any personal funds provided by the candidate under subsection (c) of section 9-710 [Emphasis added.]
37. “General Election Campaign” means, in relevant part, “the period beginning on *the day following the day on which the candidate is nominated.*” See General Statutes § 9-700 (7). [Emphasis added.]
38. Thus, the expenditure limit applicable to the **candidate committee** of a candidate participating in the Citizens' Election Program *before* that candidate is “nominated,” and before a primary campaign, is the amount of qualifying contributions permitted in section [9-704] and any personal funds provided by the candidate under subsection (c) of section 9-710. General Statutes § 9-702.

39. General Statutes § 9-704 provides that:

(a) The **amount of qualifying contributions** that the candidate committee of a candidate shall be required to receive in order to be eligible for grants from the Citizens' Election Fund shall be:

* * *

(4) In the case of a candidate for . . . election to the office of state representative for a district, contributions from individuals in the aggregate amount of **five thousand dollars** . . . [Emphasis added.]

40. As such, the expenditure limit applicable to Ms. Noble's **candidate committee** before she was nominated was \$5000 plus the \$50.00 in personal funds she provided to her committee. Ms. Noble was nominated on July 10, 2008.

41. After July 10, 2008, Ms. Noble's \$5000 plus personal funds expenditure limit increased considerably to the sum of the amount of her unspent qualifying contributions and personal funds, the amount of her grant and any additional monies authorized under §§ 9-713 or 9-714. General Statutes § 9-702 (c)(C).

42. As such, the Commission must determine if Ms. Noble's candidate committee exceeded the pre-general election/nomination expenditure limit. This issue is complex because Ms. Noble did not register her candidate committee until July 16, 2008. Prior to that time, she had only made expenditures and incurred expenses through her exploratory committee, Working Families for Simsbury.

43. It is alleged, however, that because Ms. Noble's candidate committee was required to be formed prior to July 16, 2008, all expenditures made by that exploratory committee during the time in which Ms. Noble was supposed to have a candidate committee should be attributed to that candidate committee and counted against the applicable expenditure limit. The Commission agrees.

44. As noted above, Ms. Noble was required to form a candidate committee on or before June 21, 2008 and was nominated on July 10, 2008. As such, that is the period in which her \$5050 expenditure limit applied.

45. The Commission finds however that the total amount of expenditures made and expenses incurred by her exploratory and candidate committees *combined* from May 19, 2008 (exploratory committee formation) through July 28, 2008 did not even exceed \$5050. As such, the Commission concludes that Ms. Noble's candidate committee would not have exceeded the \$5050 expenditure limit from June 21, 2008 through July 10, 2008.

46. It is further alleged that Ms. Noble's exploratory committee received an impermissible in-kind contribution from the WFP that was allegedly erroneously reported by WFP and Working Families for Simsbury exploratory committee as an organization expenditure.

47. The Commission concludes, however, that because the WFP expenditure was incurred and made at a time when Ms. Noble should have had a candidate committee, it will be deemed to have been made to that candidate committee rather than her exploratory committee.
48. Pursuant to the express language of General Statutes § 9-702 (b)(3), a participating candidate committee is not eligible to receive a grant unless it, *inter alia*, returns the value of all non-qualifying contributions to the respective contributors. The Commission has previously concluded that non-monetary contributions do not meet the criteria for qualifying contributions under General Statutes § 9-704. See SEEC Declaratory Ruling No. 2007-3, *Citizens' Election Program: Qualifying Contributions* (concluding that qualifying contributions may not be in the form of non-monetary contributions.)
49. As such, the eligibility requirement of § 9-702 (b)(3) necessarily implies the legislature's intention to require a participating candidate's candidate committee to return the value of all non-monetary contributions after that candidate applies for an initial grant under General Statutes § 9-706. Said legislative intention is supported by an examination of the remaining provisions of Chapter 157 as well as the legislative history of Public Acts, Special Session, Oct. 2005, No. 05-5.
50. The evidence establishes that the WFP paid Citizens' Services Inc. (hereinafter "CSI") \$1105.00 on Ms. Noble's behalf for petition related and web design services as well as for the purchase of the domain name debforsimsbury.com. Working Families for Simsbury exploratory committee and the WFP committee reported that payment as an organization expenditure made by WFP on her behalf. The invoice provided by WFP for said payment is dated June 30, 2008 and an expenditure is reported as being made by WFP to CSI in that amount on June 30, 2008.
51. The petition related services provided by CSI consisted of voter contact in the 16th District by field representatives of CSI for the purposes of collecting nominating petitions and raising qualifying contributions to qualify the campaign for public financing from the Citizen's Election Program.
52. Pursuant to General Statutes §§ 9-601a (b)(16) and 9-601b (b)(8) an "organization expenditure" is neither a "contribution" nor an "expenditure." General Statutes § 9-601(25) defines organization expenditure. It provides as follows in relevant part:

(25) "**Organization expenditure**" means an expenditure by a party committee . . . for the benefit of a candidate or candidate committee for:

(A) The preparation, display or mailing or other distribution of a party candidate listing. As used in this subparagraph, "party candidate listing" means any communication that meets the following criteria: (i) The communication lists the name or names of candidates for election to public office, (ii) the communication is distributed through public advertising such as broadcast stations, cable television, newspapers or similar media, or

through direct mail, telephone, electronic mail, publicly accessible sites on the Internet or personal delivery, (iii) the treatment of all candidates in the communication is substantially similar, and (iv) the content of the communication is limited to (I) for each such candidate, identifying information, including photographs, the office sought, the office currently held by the candidate, if any, the party enrollment of the candidate, a brief statement concerning the candidate's positions, philosophy, goals, accomplishments or biography and the positions, philosophy, goals or accomplishments of the candidate's party, (II) encouragement to vote for each such candidate, and (III) information concerning voting, including voting hours and locations;

...

(D) The retention of the services of an advisor to provide assistance relating to campaign organization, financing, accounting, strategy, law or media .

(E) The use of offices, telephones, computers and similar equipment which does not result in additional cost to the party committee, legislative caucus committee or legislative leadership committee. . . . [Emphasis added.]

53. Thus, an expenditure made by a party committee that falls within subdivision (A), (B), (C), (D), or (E) of subsection (25) of General Statutes § 9-601 and benefits a candidate with a candidate committee or an exploratory committee qualifies as an organization expenditure.
54. Thus, the Commission applies the familiar principles of statutory construction to determine if that provision applies to the facts of this case. “When construing a statute, [the] fundamental objective is to ascertain and give effect to the apparent intent of the legislature. . . . In other words, we seek to determine, in a reasoned manner, the meaning of the statutory language as applied to the facts of [the] case, including the question of whether the language actually does apply. . . . In seeking to determine that meaning, General Statutes § 1-2z directs us first to consider the text of the statute itself and its relationship to other statutes. If, after examining such text and considering such relationship, the meaning of such text is plain and unambiguous and does not yield absurd or unworkable results, extratextual evidence of the meaning of the statute shall not be considered. . . . When a statute is not plain and unambiguous, we also look for interpretive guidance to the legislative history and circumstances surrounding its enactment, to the legislative policy it was designed to implement, and to its relationship to existing legislation and common law principles governing the same general subject matter. . . .” State v. Tabone, 292 Conn. 417, 431-32 (2009).
55. The terms advisor, service, organization, strategy, and media were not defined by the legislature for the purposes of General Statutes § 9-601 (25)(D). The Commission will therefore construe those words according to their common usage. General Statutes § 1-1 (a); Evanuska v. City of Danbury, 285 Conn. 348, 359 (2008). To ascertain that usage, the Commission can look to the dictionary definition of those terms. State v. Sandoval, 263 Conn. 524, 552 (2003).

56. According to Webster's II New College Dictionary "service" is defined as "[w]ork done for others as an occupation or business." "Organization" is defined as "[a]n act or instance of organizing or the process of being organized" and "organize" means "[t]o arrange systematically for harmonious or united action." Id. "Strategy" means "[a] plan of action resulting from the practice of strategy and "[t]he art or skill of using strategems in endeavors such as politics and business." Id. "Media" which is the plural of "medium" means "[a] means of mass communication, as newspapers, magazines, or television." Id. Finally, "advisor" is defined as "[o]ne who advises" or "[a] person who offers advice, esp. professionally or officially" and "advice" means an "[o]pinion about a course of action: counsel." Id.
57. In addition, the legislative record pertaining to the relevant text provides evidence that legislature also intended the terms "advisor" and "service" to include a consultant that designs a political message.
58. With that in mind, the Commission concludes that the portion of the payment to CSI concerning petition related services (\$840) falls within General Statutes § 9-601 (25)(D) as those services were related to Ms. Noble's campaign organization and/or strategy. Furthermore, the Commission finds that WFP sought and received advice from Commission staff and relied on that advice when making the payment to CSI on Ms. Noble's behalf.
59. The Commission further concludes that the portion of the payment from WFP to CSI related to the design of Ms. Noble's campaign website (\$255) also qualifies as an organization expenditure as that service related to campaign media.
60. The portion of the WFP's payment attributable to the purchase by CSI of the domain name (\$10) does not, however, qualify as an "organization expenditure" as the expenditure in question was not made for: a party candidate listing (§ 9-601 (25)(A)); a party building document (§ 9-601 (25)(B)); a campaign event (§ 9-601 (25)(C)); part of CSI's services (§ 9-601 (25)(D)); or for the use of offices, telephones, computers and similar equipment which did not result in additional cost to WFP (§ 9-601 (25)(E)).
61. The Commission finds that WFP and Working Families for Simsbury believed in good faith said payment did qualify as an organization expenditure. Nevertheless, the Commission concludes that Ms. Chmielecki violated General Statutes § 9-702 (b)(3) for failing to return the value of that in-kind contribution after Ms. Noble submitted her Grant Application Form (SEEC Form 15) to the Commission on October 9, 2008.
62. The Commission declines however to take further action for said violations given this is the first time the Commission has expressed that the purchase of a domain name under these circumstances is not an organization expenditure, the novelty of the § 9-702 (b)(3) analysis concerning non-monetary contributions made prior to the receipt of a grant, the good faith belief that said purchase was an organization expenditure, the de minimis value of the contribution, and the lack of evidence that Ms. Chmielecki intentionally violated the law.

63. The Commission notes that pursuant to General Statutes § 9-718 (c), WFP was limited to providing \$3500 in organization expenditure to the Working Families for Simsbury candidate committee and concludes that, in the present case, that limit was not exceeded.
64. Finally, it is alleged that the proper attribution was not provided on the flyers distributed by Ms. Noble and her petition circulators.
65. As noted earlier, Ms. Noble and her petition circulators distributed two flyers. The content of one of those flyers was previously described herein in paragraph 30 . The second flyer was a two-sided color party platform that did not mention Deborah Noble or, for that matter, any candidates for November 2008 election. Those flyers were paid for by WFP.
66. General Statutes § 9-621 (a), as amended by Public Act 08-2, provides in relevant part as follows:

No. . . candidate or committee shall make or incur any expenditure including an organization expenditure for a party candidate listing, as defined in subparagraph (A) of subdivision (25) of section 9-601, **for any written, typed or other printed communication, or any web-based, written communication, which promotes the success or defeat of any candidate's campaign for nomination at a primary or election or solicits funds to benefit any political party or committee unless such communication bears upon its face (1) the words "paid for by" and the following: . . . (B) in the case of a committee other than a party committee, the name of the committee and its campaign treasurer; (C) in the case of a party committee, the name of the committee. . . and (2) the words "approved by" and the following: (A) In the case of an individual making or incurring an expenditure with the cooperation of, at the request or suggestion of, or in consultation with any candidate, candidate committee or candidate's agent, the name of such individual; or (B) in the case of a *candidate* committee, the name of the candidate. [Emphasis added.]**

67. As such, an expense incurred by an exploratory committee for a written communication that promotes the success or defeat of a candidate or solicit funds for a committee need only state the name of the committee and the campaign treasurer. That communication does not have to state who the communication is approved by since that requirement only applies to individuals and candidate committees.
68. The cost of the first flyer was incurred by Working Families for Simsbury exploratory committee and reported as such. That flyer contained the attribution: "Paid for by Working Families for Simsbury, Sharon Chmielecki, Treasurer. . . ." The Commission therefore concludes that General Statutes § 9-621 was not violated.
69. Furthermore, the flyer distributed by Ms. Noble's circulators but paid for by the WFP contained the following attribution "Paid for Working Families Campaign Committee,

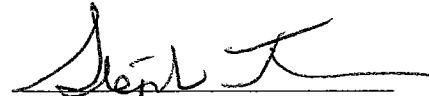
Deborah Noble, Treasurer.” Pursuant to General Statutes § 9-621, party committee communications that fall within the scope of that provision need only state the name of the committee. The Commission therefore concludes that even if the flyer’s content brought that communication within the scope of § 9-621, that flyer bears the proper attribution as WFP is registered with the Commission as Working Families Campaign Committee. As a consequence, General Statutes § 9-621 was not violated.

ORDER

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

That the matter be dismissed.

Adopted this 21st day of April 2010 at Hartford, Connecticut



Stephen F. Cashman, Chairman
By Order of the Commission