

**JOINT AGREEMENT CONTAINING CONSENT ORDER
FOR VIOLATIONS OF GENERAL STATUTES §§ 9-603, 9-605 AND 9-608**

This agreement, by and between Sandra Westbrook and Jasmine Wolf of Coventry, Connecticut and the authorized representative of the State Elections Enforcement Commission is entered into in accordance with Connecticut General Statutes § 4-177(c) and section 9-7b-54 of the Regulations of Connecticut State Agencies. In accordance herewith, the parties agree that:

1. The Complainant alleges that Save Open Space Coventry (hereinafter "SOS Coventry") did not register a political committee with the State of Connecticut since its formation in September of 2007 and has not filed a disclosure statement since that time.
2. At all relevant times, Sandra Westbrook was designated chairperson of that committee and Jasmine Wolf was the designated treasurer.
3. The Commission finds that SOS Coventry did register as a durational political committee to support municipal candidates for offices in the Town of Coventry only with the Coventry Town Clerk in September of 2007. The Commission further finds that SOS Coventry filed its disclosure statements in the Town of Coventry until its termination on March 9, 2008.
4. General Statutes § 9-603 provides, in relevant part, as follows:
 - (a) Statements filed by . . . those political committees . . . formed to aid or promote the success or defeat of any candidate for the office of Governor, Lieutenant Governor, Secretary of the State, State Treasurer, State Comptroller, Attorney General, judge of probate and members of the General Assembly, **shall be filed with the State Elections Enforcement Commission. . . .**
 - (b) Statements filed by . . . those political committees . . . formed to aid or promote the success or defeat of any candidate for public office, other than those enumerated in subsection (a) of this section, or the position of town committee member shall **be filed only with the town clerk of the municipality in which the election . . . is to be held. . . .** [Emphasis added.]
5. The Commission concludes that up to the point of its termination in March of 2008, SOS Coventry properly filed its registration and disclosure statements with the town clerk only as it only made expenditures to influence the nomination or election of local candidates and/or referendum questions. See General Statutes §§ 9-603, 9-605 and 9-608 (providing that statements filed by those political committees formed to aid or promote the success or defeat of any candidate for municipal office or the position of town committee member only, shall be filed only with the town clerk of the municipality in which the election is to be held.)
6. The Commission further finds that SOS Coventry did, however, register another political committee (hereinafter "SOS Coventry II") in February of 2008. SOS Coventry II was

registered as an ongoing political committee whose purpose, as amended in March of 2008, was to aid or promote the success or defeat of municipal candidates and candidates for statewide office or General Assembly. SOS Coventry II did not however file its Registration Statement or disclosure statements with the Commission. Instead, it continued to file those statements with the Coventry Town Clerk.

7. General Statutes §§ 9-603, 9-605 and 9-608 require that statements filed by political committees formed to aid or promote the success or defeat of any candidate for the office of Governor, Lieutenant Governor, Secretary of the State, State Treasurer, State Comptroller, Attorney General, judge of probate and members of the General Assembly, shall be filed with the State Elections Enforcement Commission. See General Statutes §§ 9-603 (a), 9-605 (a) and 9-608 (a).
8. Respondent Westbrook was responsible for filing SOS Coventry II's registration statements pursuant to General Statutes § 9-605, and Respondent Wolf was responsible for filing SOS Coventry II's disclosure statements pursuant to General Statutes § 9-608.
9. As such, Respondents Westbrook and Wolf violated those provisions by failing to file SOS Coventry II's registration and disclosure statements with the Commission rather than the Coventry Town Clerk. Specifically, Respondent Westbrook violated §§ 9-603 and 9-605, and Respondent Wolf violated General Statutes §§ 9-603 and 9-608. The evidence establishes that those violations were unintentional and there was no attempt by the Respondents to avoid disclosure.
10. The Commission notes that it has been provided with copies of the registration and disclosure statements identified herein and will obtain the original filings from the Coventry Town Clerk for filing with its Campaign Disclosure and Audit Unit.
11. The Respondents admit all jurisdictional facts and agree that this Joint Agreement and Order shall have the same force and effect as a final decision and order entered after a full hearing, and shall become final when adopted by the Commission. The Respondents shall receive a copy thereof as provided in section 9-7b-56 of the Regulations of Connecticut State Agencies.
12. It is understood and agreed that this Joint Agreement will be submitted to the Commission at its next meeting and, if it is not accepted by the Commission, it is withdrawn by the Respondents and may not be used as an admission in any subsequent hearing, if the same becomes necessary.
13. The Respondents waive:
 - (a) Any further procedural steps;
 - (b) The requirement that the Commission's decision contain a statement of findings of fact and conclusions of law, separately stated; and
 - (c) All rights to seek judicial review or otherwise to challenge or contest the validity of the Order entered into pursuant to this Agreement.
14. Upon the Respondents' compliance with the Order hereinafter stated, the Commission shall not initiate any further proceedings against them pertaining to this matter.

ORDER

IT IS HEREBY ORDERED that henceforth, Respondent Westbrook shall strictly comply with the applicable requirements of Connecticut General Statutes §§ 9-603 and 9-605.

IT IS FURTHER ORDERED that henceforth, Respondent Wolf shall strictly comply with the applicable requirements of Connecticut General Statutes §§ 9-603 and 9-608.

For the State of Connecticut

Dated:

7/27/10

By:



Joan M. Andrews, Esq.
Director of Legal Affairs and Enforcement
& Authorized Representative of the
State Elections Enforcement Commission
20 Trinity Street
Hartford, Connecticut

The Respondent

Dated:

7/27/10

By:



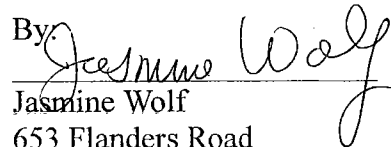
Sandra Westbrook
159 Edgewater Drive
Coventry, CT 06238

The Respondent

Dated:

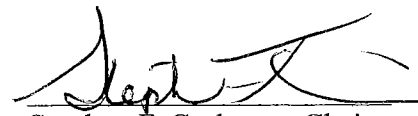
7/28/10

By:



Jasmine Wolf
653 Flanders Road
Coventry, CT 06238

Adopted this 21st day of July, 2010 at Hartford, Connecticut by vote of the Commission.



Stephen F. Cashman, Chair
By Order of the Commission