

**STATE OF CONNECTICUT**  
**STATE ELECTIONS ENFORCEMENT COMMISSION**

In the Matter of a Complaint by Mark P. Trojanowski,  
Bridgeport

File No. 2015-091

**FINDINGS & CONCLUSIONS**

Complainant Mark P. Trojanowski of Bridgeport filed this complaint alleging that Ganim for Bridgeport Campaign (hereinafter "Committee") received impermissible contributions as reported in its campaign finance statements. The Committee was formed by Joseph P. Ganim in his mayoral campaign for the November 3, 2015 municipal election in the City of Bridgeport. After an investigation of the matter, the Commission adopts the following findings of fact and conclusions of law:

1. Complainant Mark P. Trojanowski filed this complaint alleging that upon a review of its campaign finance filings he determined that the Committee received impermissible contributions. Complainant stated that:

I am over the age of 18, and understand the obligations of an oath. I am submitting the following complaint and request for an investigation by your office:

On or about July 10, 2015, I reviewed the campaign financing filings, SEEC Form 20, of the Ganim for Bridgeport campaign, specifically the latest filing, dated 06/30/15.

Upon information and belief, the source of these fifteen contributions may be limited liability companies and not personal funds. It is important that the SEEC investigate this issue, especially considering Mr. Ganim's history of legal and campaign finance issues.

In the SEEC form, the contributions that merit investigation fall largely into three categories:

- (1) Large contributions attributed to individuals who failed to disclose their occupation;
- (2) Large contributions attributed to individuals who claim occupations that are inconsistent with the contribution amounts; and

(3) Large contributions by self-employed individuals or employees of limited liability companies that may be paid directly by the business entity and not the individual employees.<sup>1</sup>

2. General Statutes § 9-608 provide the requirements for statements filed by treasurers. Further, that section provides for the requirements for itemizing the contents of financial statements.<sup>2</sup> More specifically, that section requires the disclosure of the principal occupation and employer for each individual who contributes in the aggregate an excess of one hundred dollars but not more than one thousand dollars, “to the extent known.”<sup>3</sup>

Allegation One: The Committee Disclosed “Large contributions” attributed to individuals who failed to disclose their occupation.

3. The investigation determined that the Committee used an “Individual Contributor Certification Form” when soliciting and receiving a contribution. That form included data fields to identify the “name of employer” and “principal occupation” for each individual making a contribution.
4. The investigation determined that the Committee sought and received advice from commission staff that, while the committee should request such information with each contribution, it was not barred from accepting an individual contribution when such information was not provided. The investigation confirmed that commission staff advice was required by statute to be reported “to the extent known” on the Committee’s financial statements.<sup>4</sup>
5. The Commission finds after investigation that Allegation One was not supported by the facts or the law after investigation and therefore concludes that this allegation should be dismissed.

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<sup>1</sup> See Complaint by Mark P. Trojanowski, Bridgeport, SEEC File No. 2015-091 (Rec’d Aug. 4, 2015) (alleging campaign finance violations by “Ganim for Bridgeport”).

<sup>2</sup> See General Statutes § 9-608 (c) (1) (A) (requiring that each filing contain an “itemized accounting of each contribution”); and, General Statutes § 9-608 (c) (1) (I) (requiring the disclosure of each individual “who contributes in excess of four hundred dollars in the aggregate to or for the benefit of any candidate’s campaign for nomination at a primary or election to the office of chief executive officer” of a city “indicating whether the individual or a business with which he is associated has a contract with said municipality that is valued at more than five thousand dollars”).

<sup>3</sup> See General Statutes § 9-608 (c) (1) (F).

<sup>4</sup> See Greater Waterbury Board of REALTORS, E-mail Statistics from Constant Contact (October 7, 2014).

Allegation Two: The Committee disclosed “Large contributions” attributed to individuals who claim occupations that are inconsistent with the contribution amounts.

6. Allegation Two does not specifically allege a violation of Chapter 155, General Statutes. Further, the investigation indicated that Complainant admitted his basis for this allegation was not firsthand knowledge and largely based on inference.
7. The Commission dismisses Allegation Two for there is no basis in the law or on the facts to substantiate a campaign finance violation.

Allegation Three: The Committee disclosed “Large contributions” by self-employed individuals or employees of limited liability companies that may be paid directly by the business entity and not the individual employees.

8. The investigation determined that there was sufficient and credible evidence that the individuals identified by Complainant as having made contributions to the Committee through their businesses, in fact, made such contributions by personal checking accounts.
9. The Committee through bank records was able to verify that the “large contributions” that were subject of Allegation Three were drawn on personal checking accounts. The investigation by testimony and written questionnaire verified that the individuals in question claim to have made each contribution with personal funds and without reimbursement from any source.
10. The Commission dismisses Allegation Three as there was a lack of evidence to substantiate a campaign finance violation as alleged by Complainant.
11. Based on the above-referenced findings and conclusions, Complainant’s allegations were unsubstantiated after investigation and therefore this matter should be dismissed.

**ORDER**

IT IS HEREBY ORDERED THAT:

The Complaint is dismissed.

Adopted this 19<sup>th</sup> day of June, 2019 at Hartford, Connecticut by vote of the Commission.

  
Salvatore Bramante Vice Chair  
By Order of the Commission

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