

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

*In re. SEEC Initiated: Audit Findings for  
Noele Kindey for State Representative*

File No. 2015-146

**AGREEMENT CONTAINING A CONSENT ORDER**

This Agreement by and between Meagan L. Luginbuhl, Town of Ellington, State of Connecticut, hereinafter referred to as Respondent, and the undersigned authorized representative of the State Elections Enforcement Commission, is entered into in accordance with Connecticut General Statutes § 4-177 (c) and Regulations of Connecticut State Agencies § 9-7b-54. In accordance herewith, the parties agree that:

1. The Commission initiated this complaint against Meagan L. Luginbuhl, campaign treasurer for the *Noele Kindey for State Representative* candidate committee, based on findings generated by the Commission's Audit & Final Disclosure Unit. The Commission's audit of the Kindey candidate committee showed that the treasurer had allowed another individual to authorize expenditures on behalf of the Committee. Specifically, the Commission's investigation revealed that the candidate's sister and campaign manager, Kelly Fuhlbrigge, had signed checks on behalf of the Committee.
2. Noele Kindey ran in the 2014 election cycle as a Democratic Party candidate for the 57<sup>th</sup> General Assembly seat. Kindey formed her candidate committee on May 30, 2014 and named Meagan L. Luginbuhl as her treasurer.<sup>1</sup> The candidate committee participated in the Citizens' Election Program and received a grant of \$28,850.07 from the Citizens' Election Fund on September 15, 2014.<sup>2</sup>
3. The Commission's audit of the Kindey candidate committee found four checks that were not signed by the treasurer. Those expenditures of the candidate committee were not authorized by the treasurer, and instead were authorized by the campaign manager, Ms. Fuhlbrigge, who signed checks to make those expenditures.
4. General Statutes § 9-606 (a) requires the committee's treasurer to be responsible for, among other things, making and reporting all expenditures of the committee. *See* General Statutes § 9-606 (a). Only a committee treasurer may authorize expenditures

---

<sup>1</sup> *See* SEEC Form 1 – Registration by Candidate (Noele Kindey, rec'd May 30, 2014) (forming *Noele Kindey for State Representative* candidate committee).

<sup>2</sup> *See* SEEC Form 30 – October 10 Filing (*Noele Kindey for Sate Representative*, Oct. 10, 2014) (reflecting receipt of grant money on September 15, 2014).

for which the committee will be liable. *See* General Statutes § 9-607 (a). Only the treasurer may pay for the obligations of the committee, which must be authorized by the treasurer and paid only by a check drawn on the depository institution or via a debit card or credit card. *See* General Statutes §§ 9-607 (d) and (e).

5. In this case, the campaign manager, who was not authorized to act as treasurer for the committee, signed 4 checks for expenditures of the candidate committee totaling \$14,699.86, all of which were written after the candidate committee had received a grant from the Citizens' Election Fund. According to the investigation, the expenditures for which the candidate executed committee checks appear to be permissible under Connecticut campaign finance statutes.
6. General Statutes § 9-7b provides in part:
  - (a) The State Elections Enforcement Commission shall have the following duties and powers: . . .
    - (2) To levy a civil penalty not to exceed . . . (D) two thousand dollars per offense or twice the amount of any improper payment or contribution, whichever is greater, against
7. As stated above, the Commission has the authority to impose a civil penalty of as much as \$2,000 for each offense of Connecticut's General Statutes regarding campaign finance and can also reduce that penalty where circumstances warrant such leniency.
8. Respondent admits all jurisdictional facts and agrees that this Agreement and Order shall have the same force and effect as a final decision and Order entered into after a full hearing and shall become final when adopted by the Commission.
9. Respondent waives:
  - 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.
10. It is understood and agreed that this Agreement will be submitted to the Commission for consideration at its next meeting and, if the Commission does not accept it, it is withdrawn and may not be used as an admission by the Respondent in any subsequent hearing, if the same becomes necessary.

RECEIVED  
STATE ELECTIONS  
STATE ELECTIONS

OCT 30 2018

ENFORCEMENT COMMISSION  
ENFORCEMENT COMMISSION

**ORDER**

IT IS HEREBY ORDERED THAT the Respondent Meagan Luginbuhl pay a civil penalty of \$200 and that in the future that she will exercise appropriate controls over the committee and will authorize all expenditures as required under General Statutes §§ 9-606 and 9-607.

The Respondent

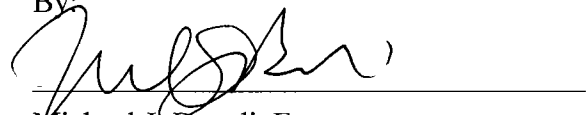
For the State of Connecticut

By:



Meagan L. Luginbuhl  
5 Benjamin Dr  
Ellington, CT 06029

By:



Michael J. Brandi, Esq.  
Executive Director and General Counsel and  
Authorized Representative of the  
State Elections Enforcement Commission  
20 Trinity St., Suite 101  
Hartford, CT 06106

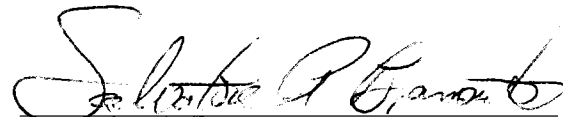
Dated:

10/29/2018

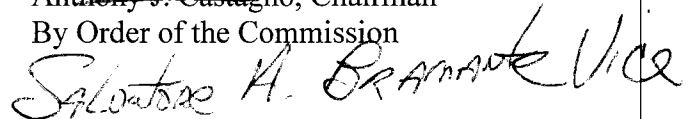
Dated:

11/1/18

Adopted this 14<sup>th</sup> day of November, 2018 at Hartford, Connecticut by vote of the Commission.



Anthony J. Castagno, Chairman  
By Order of the Commission



Salvatore A. Bramante Vice