

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In re. Audit Findings of Rodriguez for State Rep. 2014

File No. 2016-018

FINDINGS & CONCLUSIONS

The State Elections Enforcement Commission initiated this complaint based on the results of a post-election audit conducted of the *Rodriguez for State Rep. 2014* candidate committee. The audit showed that certain payments to an individual affiliated with the candidate committee may have been impermissible. Given facts described in this document, however, the Commission will take no further action and adopts the following findings of fact and conclusions of law:

1. Candidate Ruben A. Rodriguez established a candidate committee to run for the 72nd district General Assembly seat on April 15, 2014.¹ The committee applied for a grant from the Citizens' Election Fund on July 14, 2014.² The committee received a grant totaling \$27,666 from the Citizens' Election Fund on October 14, 2014.³
2. The post-election audit of the candidate committee revealed several issues, including payments lacking the proper backup documentation that were made to the treasurer's husband for work he performed on behalf of the campaign.
3. The Commission authorized the initiation of this enforcement matter based on the documentation problems related to the operation of the committee.
4. Following the initiation of this complaint, commission staff attempted on numerous times to contact the treasurer of the committee, Jessica Vazquez. Despite repeated attempts to contact her through the mail, via telephone, and via other electronic means to complete this investigation, investigators were unable to communicate with Ms. Vazquez to the degree necessary to finalize the audit and resolve outstanding issues. Since communicating with her early in the process, Ms. Vazquez has been non-responsive and recent attempts to communicate with her have proved fruitless.

¹ See Registration by Candidate, SEEC Form 1 (Rec'd April 15, 2014) (establishing candidate committee to support Ruben A. Rodriguez's candidacy for the General Assembly seat representing 72nd district and naming Jessica Vazquez as treasurer).

² See Citizens' Election Program – Application for Grant, SEEC Form CEP 15 (Rec'd Sept. 25, 2014) (applying for grant from Citizens' Election Fund).

³ See Itemized Campaign Finance Disclosure Statement, SEEC Form 30 (Rec'd October 23, 2014) (reflecting payment of grant to committee on October 14, 2014).

5. The candidate, Rodriguez, provided what documentation that he had in his possession as well as a statement that answered some of the questions raised by the referral, but Ms. Vazquez still retained many of the documents that were needed to complete the audit of the committee.
6. According to the truncated audit of the committee, based on the documents that audit staff had on hand, a total of \$2,290 was paid to Ms. Vazquez's husband, Jesus Vazquez, for work that he performed on behalf of the campaign.
7. The nature of that work, however, and the amount of time that Mr. Vazquez spent on that work to justify the payments made to him remains unclear.
8. General Statutes § 9-606 (a) requires a treasurer, among other things, to make and report all expenditures of the committee and to keep internal records of each entry made on statements filed with the Commission.⁴ To corroborate expenditures, the treasurer must supply contemporaneous documentation of each expenditure.⁵ The Commission's regulations require all committees to execute a written contract for any services rendered valued at more than \$100 as well as to provide documentation showing what services were actually provided.⁶
9. The general statutes require the campaign treasurer of a candidate committee to retain all financial documentation from the committee for at least four years from the date of the last report that the candidate committee was required to file.⁷
10. The legislature has vested the Commission with the authority to "inspect or audit at any reasonable time and upon reasonable notice the account or records of any campaign treasurer or principal campaign treasurer, as required by chapter 155 or 157[.]"⁸
11. Respondent did not provide documentation to the Commission during the course of the audit, including contracts to support payments made to committee workers that exceeded \$100.
12. Given the time that has elapsed since the alleged violations as well as the inability of investigators to find Ms. Vazquez, the Commission will take no further action on the

⁴ See General Statutes § 9-606(a) (laying out responsibilities of treasurers under Connecticut's campaign finance statutes).

⁵ See Regs., Conn. State Agencies, § 9-607-1.

⁶ *Id.*

⁷ See General Statutes § 9-607(f).

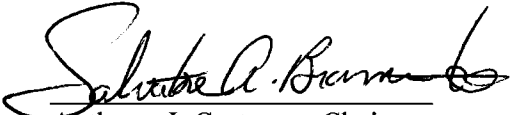
⁸ General Statutes § 9-7b(a)(5).

allegations initially identified in the 2014 application and will dismiss this matter without prejudice to re-opening it should Ms. Vazquez be located.

ORDER

IT IS HEREBY ORDERED THAT the Complaint will be dismissed without prejudice and that the associated audit of the *Rodriguez for State Rep. 2014* candidate committee will be closed.

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


~~Anthony J. Castagno, Chairman~~
By Order of the Commission *Vice Chair*
Salvatore Bramante

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JUN 19 2019

ENFORCEMENT COMMISSION