

**STATE OF CONNECTICUT  
STATE ELECTIONS ENFORCEMENT COMMISSION**

In the Matter of a Complaint by Joshua Fedeli, Stamford

File No. 2017-071

**AGREEMENT CONTAINING A CONSENT ORDER**

The parties, William L. Jenkins (the "Respondent") and the undersigned authorized representative of the State Elections Enforcement Commission (the "Commission"), enter into this agreement as authorized by Connecticut General Statutes § 4-177 (c) and Regulations of Connecticut State Agencies § 9-7b-54. In accordance with those provisions, the parties agree that:

**ALLEGATIONS**

1. The Complainant alleged that the Respondent, as treasurer of the Barry 2017 candidate committee ("Barry 2017" or the "Committee"), failed to file financial disclosure statements on SEEC forms by October 10, 2017, covering the period of July 1, 2017 to September 30, 2017 and by October 31, 2017 covering the period of October 1, 2017 to October 29, 2017.

**LAW**

2. General Statutes § 9-608 (a) requires that each treasurer of a committee file periodic financial disclosure statements concerning the financial activities of such committee.
3. General Statutes § 9-608 (c) specifically provides, in pertinent part:

(1) Each statement filed under subsection (a), (e) or (f) of this section shall include, but not be limited to: (A) An itemized accounting of each contribution, if any, including the full name and complete address of each contributor and the amount of the contribution; . . . (F) for each individual who contributes in excess of one hundred dollars but not more than one thousand dollars, in the aggregate, to the extent known, the principal occupation of such individual and the name of the individual's employer, if any; (G) for each individual who contributes in excess of one thousand dollars in the aggregate, the principal occupation of such individual and the name of the individual's employer, if any[.]

4. The Commission has previously concluded that the Commission has "the authority to prescribe the forms required to be filed under the campaign finance provisions." *In the Matter of a Referral by the Campaign Disclosure and Audit Unit of the State Elections Enforcement Commission*, File Nos. 2015-108DNF & 2015-109DNF. See also, General Statutes § 9-624 (a).

## DISCUSSION

5. The Barry 2017 candidate committee formed on June 28, 2017 as the funding source for Barry Michelson's 2017 candidacy for Mayor of Stamford.
6. On October 3, 2017, Barry 2017 filed an amended registration statement with the Stamford Town Clerk, naming the Respondent as Treasurer.
7. As the treasurer of a municipal candidate committee in Stamford, the Respondent was required to file financial disclosure statements with the Stamford Town Clerk by October 10, 2017, covering the period of July 1, 2017 to September 30, 2017 and by October 31, 2017 covering the period of October 1, 2017 to October 29, 2017.
8. William L. Jenkins filed a document with the Stamford Town Clerk on October 1, 2017 concerning Barry 2017.
9. The document William L. Jenkins filed with the Stamford Town Clerk on October 1, 2017 was not on a form published by the State Elections Enforcement Commission.
10. William L. Jenkins filed a document with the Stamford Town Clerk on October 30, 2017 concerning Barry 2017.
11. The document William L. Jenkins filed with the Stamford Town Clerk on October 30, 2017 was not on a form published by the State Elections Enforcement Commission.
12. On February 10, 2016, as part of resolution of two enforcement matters, the Commission issued an order to the Respondent to, "henceforth strictly comply with the requirements of General Statutes § 9-608, as set forth in SEEC Advisory Opinion 2014-02 and in this decision, *to file campaign finance statements on the forms prescribed by the Commission.*" In the Matter of a Referral by the Campaign Disclosure and Audit Unit of the State Elections Enforcement Commission, File Nos., 2015-108DNF & 2015-109DNF (emphasis added).
13. The Commission deems such conduct to be an intentional violation of General Statutes §§ 9-608 and 9-624.

**TERMS OF GENERAL APPLICATION**

14. The Respondent admits to 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.
15. The 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 to contest the validity of the Order entered into pursuant to this Agreement.
16. Upon the Respondent's agreement to comply with the Order hereinafter stated, the Commission shall not initiate any further proceedings against the Respondent regarding this matter.
17. It is understood and agreed by the parties to this Agreement that the Commission will consider this Agreement at its next available meeting and, if the Commission rejects it, the Agreement will be withdrawn and may not be used as an admission by the Parties in any subsequent hearing, proceeding or forum.

**ORDER**

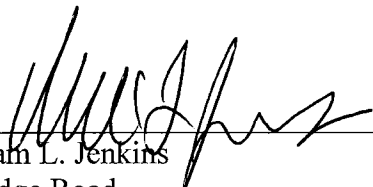
It is hereby ordered that the Respondent shall pay a civil penalty of \$4,000 (\$2,000 for each violation) for failing to comply with the requirements of General Statutes §§ 9-608 and 9-624. Collection of such civil penalty shall be suspended for a period of five (5) years. If, after five (5) years, the Respondent remains in compliance with this order, this civil penalty shall be withdrawn and no payment shall be required.

It is further ordered that the Respondent shall not serve as a treasurer of any committee subject to the jurisdiction of the Commission for a period of five (5) years. Such restriction shall become effective March 1, 2018.

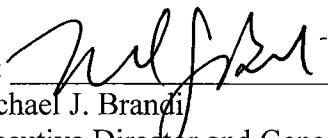
The Respondent shall not serve as the treasurer of any committee for which he is not already a treasurer as of January 18, 2018 for a period of five (5) years.

It is hereby ordered that the Respondent shall henceforth strictly adhere to the requirements of General Statutes §§ 9-608 and 9-624.

**For the Respondent:**

By:   
William L. Jenkins  
63 Ridge Road  
Chaplin, CT 06235


**For the State of Connecticut:**

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

Dated: 1/18/18

Dated: 1/18/18

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

  
Anthony J. Castagno, Chairman  
By Order of the Commission

RECEIVED  
STATE ELECTIONS

JAN 18 2018

ENFORCEMENT COMMISSION