

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint by J. R. Romano,
Branford

File No. 2018-073

AGREEMENT CONTAINING CONSENT ORDER

This agreement by and between Greg Wong (hereinafter "Respondent") and the authorized representative of the State Elections Enforcement Commission is entered into in accordance with Section 9-7b-54 of the Regulations of Connecticut State Agencies and Section 4-1 77(c) of the General Statutes of Connecticut. In accordance herewith, the parties agree that:

1. Complainant alleged that Respondents Elizabeth Schwebel, David A. Holdridge, and Greg Wong failed to disclose, on itemized campaign finance disclosure statements fundraisers and/or events and associated expenditures by "Liz for the 42nd," (hereinafter "Committee"). A failure to report fundraisers and events, and related expenditures, is a violation of General Statutes § 9-608.
2. This Consent agreement between Respondent and the Commission is limited to the allegations in File No. 2018-073 and does not address any additional recommendations, facts or findings that may result from the pending review of "Liz for the 42nd." Respondents have no prior history with the Commission.
3. General Statutes § 9-602 provides liability for the treasurer for all duties regarding filings required by Chapter 155, General Statutes. Under campaign finance laws therefore David A. Holdridge the Committee treasurer was a potential Respondent in this matter.
4. However, based on Respondent's assumption of duties as deputy treasurer of the Committee under these narrow and limited circumstances, as detailed herein, and in light of his personally taking full responsibility in the course of this investigation for the actions that gave rise to this complaint, the Commission limits its findings and conclusions in settlement of this matter to Respondent.
5. General Statutes § 9-608, provides in pertinent part:
 - (a) (1) Each treasurer of a committee, other than a state central committee, shall file a statement, sworn under penalty of false statement with the proper authority in accordance with the provisions of section 9-603, (A) on the tenth calendar day in the months of January, April, July and October, provided, if such tenth calendar day is a Saturday, Sunday or legal holiday, the statement shall be filed on the next business day, except that in the case of a candidate or exploratory committee established for an

8. The Committee participated in the CEP and received a full grant from the CEF. Complainant alleged that the Committee grant application was not filed on time. However, a review of Commission records indicate that Commission staff determined that the application was complete as a “good faith submission” and updates were submitted, as requested, to satisfy the staff.¹
9. Consequently, Commission staff recommended the grant application be treated as timely and that a full grant be issued to the Committee. The Commission therefore dismisses the allegation pertaining to the Committee filing a late CEP application be dismissed.
10. Upon investigation, Respondent Wong admitted that he failed to disclose three events that were “meet and greets.” On October 9, 2018 the Committee filed an amended report to disclose the associated receipts for these three events. More specifically, two of these events were house parties and the respective food and beverages provided by the hosts were reported. The Committee reported a third event held at a library where it received an in-kind contribution of \$15.74 for food provided at the event.
11. Because the Committee participated in the CEP, the aforementioned in-kind contribution was prohibited. At the recommendation of Commission staff, in the course of the validation process, the Committee disgorged the prohibited in-kind contribution in the amount of \$15.74 to the CEF as a means to get back into compliance.
12. Additionally, the investigation determined that on October 9, 2018 the Committee filed an amendment to disclose previously unreported expenditures associated with its online contribution platform. In response to this complaint and investigation Respondent Wong took responsibility for the reporting and disclosure errors and rectified the same, by filing amended reports for the Committee, at the advice of Commission staff.
13. After investigation, the Commission finds that Respondent was responsible for data entry pertaining to the Committee’s filings in this instance. Consequently, this settlement can be restricted to Respondent Wong; as the investigation did not otherwise reveal facts or circumstances that would necessitate proceeding against Respondents Schwebel and Respondent Holdridge.

¹ The approval of the Committee’s application reflected the Commission staff’s general process for 2018 committees that were participating in the first CEP cycle with a reduced grant schedule cycle, and more specifically, the staff’s responses and suggested remediation to address the Committee’s application. The Committee and Respondents incorporated recommended staff “fixes” in the process of amending its original application.

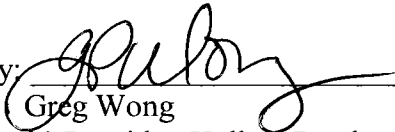
ORDER

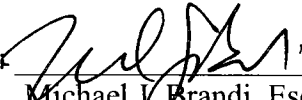
IT IS HEREBY ORDERED THAT the Respondent shall henceforth strictly comply with the requirements of General Statutes § 9-608.

IT IS HEREBY FURTHER ORDERED THAT the Respondent shall pay a total civil penalty in the amount of two hundred and fifty dollars (\$250.00), in full settlement of this matter.

The Respondents:

For the State Elections Enforcement Commission:

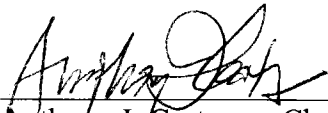
By: 
Greg Wong
20 Partridge Hollow Road
Ledyard, Connecticut

By: 
Michael J. Brandi, Esq.
Executive Director and General Counsel
and Authorized Representative of the
State Elections Enforcement Commission
20 Trinity Street, Suite 101
Hartford, Connecticut

Dated: 7/29/19

Dated: 7/30/19

Adopted this 21ST day of AUGUST, 2019 at Hartford, Connecticut


Anthony J. Castagno, Chair
By Order of the Commission