

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

In the Matter of a Complaint by Nicoletta Bleuins  
Hartford

File No. 2020-065

**AGREEMENT CONTAINING CONSENT ORDER**

This agreement by and between Salvatore Bordonaro of the Town of Berlin, County of Hartford, State of Connecticut (hereinafter “Respondent”) and the authorized representative of the State Elections Enforcement Commission is entered into in accordance with § 9-7b-54 of the Regulations of Connecticut State Agencies and § 4-177(c) of the General Statutes of Connecticut. In accordance herewith, the parties agree that:

1. Complainant Nicoletta Bleuins alleged that the qualified candidate committee of Donna Veach of Berlin had made expenditures to purchase campaign signs to promote the candidacy of Donald Trump, a Republican presidential candidate.
2. Complainant alleged that the payments made on behalf of Donald Trump violated General Statutes § 9-607, which states that the lawful purpose of a candidate committee is to promote the election of the candidate who established the committee. In addition, Regulation § 9-706-1 states that a candidate committee that received a grant from the Citizens’ Election Fund may only make expenditures that “directly further” the election of the participating candidate that created the committee.<sup>1</sup>
3. Candidate Donna Veach formed a candidate committee on May 1, 2020 to finance her candidacy for election to the 30<sup>th</sup> General Assembly seat in the 2020 election cycle.<sup>2</sup> She named Salvatore Bordonaro as the committee’s treasurer. Bordonaro also serves as the treasurer of the Berlin Republican Town Committee.<sup>3</sup> The Veach candidate committee

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<sup>1</sup> See Regulations, Conn. State Agencies, § 9-706-1 (a) (laying out general requirements for qualified candidate committee’s use of campaign funds that it received from Citizens’ Election Fund).

<sup>2</sup> See SEEC Form 1 – Registration by Candidate (*Donna Veach for House Rep 30<sup>th</sup>*, May 18, 2020) (establishing candidate committee for Donna Veach of Berlin seeking 30<sup>th</sup> General Assembly seat and naming Salvatore Bordonaro as treasurer).

<sup>3</sup> See SEEC Form 2 —Party Committee Registration (Berlin Republican Town Committee, Sept. 9, 2017) (reflecting appointment of Sal Bordonaro as treasurer of town committee).

opted to participate in the Citizens' Elections Program.<sup>4</sup> The committee received grant funds totaling \$12,230 on July 3, 2020.<sup>5</sup> The committee received a general election grant on Sept. 16, 2020 totaling \$30,575.<sup>6</sup>

4. The candidate committee treasurer, Respondent Bordonaro, communicated with commission staff following the filing of this complaint attempting to cure the expenditure that the candidate committee made to benefit Trump's candidacy. Bordonaro acknowledged that the candidate committee had made these expenditures to benefit another candidate and sought to cure the error.
5. Given several options for resolving the error, Bordonaro decided to transfer the Trump signs to the Berlin Republican Town Committee, which paid the candidate committee for the cost of the signs.
6. The candidate committee here twice violated Connecticut's campaign finance statutes. First, the candidate committee purchased the signs in support of another candidate in violation of General Statutes § 9-607. Second, the candidate committee violated General Statutes § 9-707 when it deposited a payment from the Berlin Republican Town Committee for those signs.
7. As enumerated in § 9-7b-48 of the Regulations of Connecticut State Agencies: In its determination of the amount of the civil penalty to be imposed, the Commission shall consider, among other mitigating or aggravating circumstances:
  - (1) the gravity of the act or omission;
  - (2) the amount necessary to insure immediate and continued compliance;
  - (3) the previous history of similar acts or omissions; and
  - (4) whether the person has shown good faith in attempting to comply with the applicable provisions of the General Statutes.

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<sup>4</sup> See SEEC Form CEP 10 – Affidavit of Intent to Abide by Expenditure Limits and Other Citizens' Election Program Requirements (*Donna Veach for House Rep 30<sup>th</sup>*, May 27, 2020) (reflecting intent of candidate and treasurer to participate in Citizens' Election Program and follow voluntary program rules).

<sup>5</sup> See SEEC Form 30 – First Weekly Supplemental Filing Primary (*Donna Veach for House Rep 30<sup>th</sup>*, July 23, 2020) (reflecting receipt of primary grant of \$12,230 on July 3, 2020).

<sup>6</sup> See SEEC Form 30 – October 10 Filing (*Donna Veach for House Rep 30<sup>th</sup>*, Oct. 6, 2020) (reflecting receipt of general election grant of \$30,575 on Sept. 16, 2020).

8. The Commission possesses the authority to set the punishment it imposes on individuals who violate the statutes under its authority. While the maximum penalty available under the enabling statute is \$2,000 per offense or twice the amount of any improper expenditure, the Commission also has the authority to set a lesser penalty where circumstances call for such leniency.
9. It is understood and agreed that this agreement will be submitted to the Commission at its next meeting and, if it is not accepted by the Commission, it is withdrawn by the Respondent and may not be used by either party as an admission in any subsequent hearing or against the Company in any proceeding, if the same becomes necessary.
10. 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.

RECEIVED

STATE ELECTIONS  
ENFORCEMENT COMMISSION

**ORDER**

IT IS HEREBY ORDERED THAT the Respondent shall henceforth ensure that all expenditures made by a candidate committee for which he serves as treasurer go to promote the candidacy of the candidate for whom the committee was establish, in compliance with General Statutes § 9-607, and that the Respondent shall pay a civil penalty of \$200 in his role as treasurer of the *Donna Veach for House Rep 30<sup>th</sup>* qualified candidate committee for accepting a payment from a party committee after the candidate committee had received a grant from the Citizens' Election Fund in violation of General Statutes § 9-707.

The Respondent:

BY:



Salvatore Bordonaro  
81 Gianna Lane  
Berlin, Connecticut 06037

Dated: 11-17-21

For the State of Connecticut:

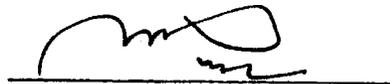
BY:



Michael J. Brandi, Esq.  
Executive Director and General Counsel  
And Authorized Representative of the  
State Elections Enforcement Commission  
55 Farmington Ave., 8<sup>th</sup> Floor  
Hartford, Connecticut

Dated: 12/8/2021

Adopted this 14<sup>th</sup> day of December, 2021, at Hartford, Connecticut



Commissioner  
By Order of the Commission