

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

In the Matter of a Complaint by Andrew J. Daniels  
Chaplin

File No. 2021-160

**FINDINGS AND CONCLUSIONS**

Complainant Andrew J. Daniels filed this complaint with the Commission pursuant to General Statutes § 9-7b, stating that he had received a promotional document for Juan Roman, who was running for first selectman in Chaplin, that failed to include the proper disclaimer as required under General Statutes § 9-621. After an investigation of the complaint, the Commission makes the following findings and conclusions:

1. Respondent Juan Roman was a candidate for the office of first selectman in Chaplin in 2021. His campaign was funded by the Chaplin Republican Town Committee.
2. Respondent Roman was engaging in door-to-door campaigning and was distributing a letter he had written and printed using his personal computer and printer that described his candidacy. The letter did not include an attribution stating that it was paid for by the Chaplin Republican Town Committee or that he had approved the letter as the candidate for whom it was made.
3. On or about September 3, 2021, Brian Cohen, the chairman of the Chaplin Republican Town Committee, contacted the Commission, asking whether Respondent's letters needed the disclaimer language. Commission staff informed him that both "paid-for-by" and "approved-by" statements were needed on the leaflets to comply with General Statutes § 9-621.
4. On or about September 9, 2021, this complaint was received by the Commission and docketed.
5. According to Respondent, he distributed approximately 19 of the leaflets without the appropriate attributions required under General Statutes § 9-621. Once he learned about the disclaimer requirement, Respondent added disclaimers stating that the letter was paid for by the town committee and that he, as the candidate, had approved the content of the letter.
6. The letter that Roman was distributing in his door-to-door visits was written in the first person by the candidate. In the letter, he described himself and his family, his experience, and his ideas about governance. He also signed the letter as "Juan Roman III, Candidate First Selectman Chaplin Roman III."

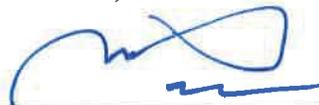
7. Based on the above, the Commission finds that the reasonable observer would conclude that the candidate issued the communications.
8. Respondent has cooperated fully with this investigation and has admitted that he failed to include the necessary attributions on the letter. Upon being notified that the letter needed attribution, Respondent corrected the letter and added the necessary attribution before distributing any additional copies.
9. General Statutes § 9-621 (a) states, in relevant part:
  - (a) No . . . candidate or committee shall make or incur any expenditure . . . for any written, typed or other printed communication, or any web-based, written communication, which promotes the success or defeat of any candidate's campaign for nomination at a primary or election or promotes or opposes any political party or solicits funds to benefit any political party or committee unless such communication bears upon its face as a disclaimer (1) the words "paid for by" and the following: . . . (B) in the case of a committee other than a party committee, the name of the committee and its treasurer; . . . and (2) the words "approved by" and the following: . . . (B) in the case of a candidate committee, the name of the candidate.
10. Based on the above, the Commission concludes that the communications should have stated "paid for by" the party committee and "approved by" the candidate.
11. Nevertheless, the Commission declines to take further action based on the Commission's finding that the source of the communications was clear to the reasonable observer, the absence of any prior violations by the respondent, and the lack of any evidence of any intent to deceive or mislead the public. *See, e.g.*, Compliant by Michael Gongler and Victor L. Hapley, Cromwell, File No. 2009-126; Complaint of Robert W. Prentice, Wallingford, File No 2011-134; Complaint by John D. Norris, Southbury, File No. 2011-108; Complaint of Arthur Scialabba, Norwalk, File No. 2012-011, Complaint of Arthur Scialabba, Norwalk, File No. 2012-0125; Complaint of Keith G. Golnik, Terryville, File No. 2013-154; and Complaint of Catherine F. Abercrombie, Meriden, File No. 2018-101.

**ORDER**

The following Order is recommended on the basis of the aforementioned findings:

That no further action be taken.

Adopted this 29<sup>th</sup> day of May, 2022 at Hartford, Connecticut.



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Stephen Penny, Chairman  
By Order of the Commission