

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

In the Matter of a Complaint by Louis DeCilio, Stratford

File No. 2021-187B

**FINDINGS AND CONCLUSIONS**

The Complainant, an elector in the Town of Stratford, made this complaint pursuant to General Statutes §9-7b. Complainant alleged several irregularities involving the *Voices For Stratford PAC*. These alleged irregularities include possible illegal “straw contributions” and failing to report such contributions.

1. Lois DeCilio (hereinafter “Complainant”) filed this complaint with the Commission alleging the *Voices For Stratford PAC* received illegal “straw contributions” and failed to report these contributions. Specifically, the complaint named Kathleen Callahan, who served as chairperson, and Karen Tracy, who served as treasurer, as Respondents. Complainant further alleges the above Respondents did not refund or disgorge wrongly received contributions timely, and they used amendments to financial disclosure reports to obfuscate these contributions.
2. At all times relevant hereto, *Voices for Stratford PAC* was a durational political slate committee registered in the Town of Stratford to make expenditures concerning the November 11, 2019 election.
3. On or about July 24, 2019, Respondents Kathleen Callahan and Karen Tracy registered *Voices For Stratford PAC* as a political slate committee within the Town of Stratford Town Clerk. On or about July 24, 2019, the committee registered with the Town of Stratford Town Clerk.
4. Complainant filed a similar complaint, Commission File No. 2019-138, against these same Respondents alleging they failed to accurately report financial transactions for *Voices for Stratford PAC*. The Commission found some discrepancies with the committee’s filings but attributed them to contributors not providing accurate information to the treasurer or ministerial mistakes. The Commission dismissed the complaint.
5. In a companion case, Commission File No. 2022-146, there were similar “straw contribution” allegations against this committee, the *Stratford Democratic Town Committee*, the 2017 *Stephanie 4 Mayor* candidate committee, and the 2020 *Stephanie for Stratford* candidate committee. In that case it was discovered that *Voices for Stratford PAC* received a “straw contribution.”

6. General Statutes § 9-622 provides, in pertinent part, that the following persons shall be guilty of an illegal practice:

(7) Any person who, directly or indirectly, individually or through another person, makes a payment or promise of payment to a treasurer in a name other than the person's own, and any treasurer who knowingly receives a payment or promise of payment, or enters or causes the same to be entered in the person's accounts in any other name than that of the person by whom such payment or promise of payment is made;

....

(10) Any person who solicits, makes or receives a contribution that is otherwise prohibited by any provision of this chapter;

7. Commission investigators questioned Karen Tracy and Kathleen Callahan. Both Respondents denied any wrongdoing. Their written responses showed acrimony between both Respondents, and the deputy treasurer Stephanie Philips, who also was serving as *Stratford Democratic Town Committee* chairperson. Both Respondents were suspicious of three \$1,000 contributions from individuals personally associated with Ms. Philips and a \$1,000 contribution that Ms. Philips hinted was above the maximum contribution limit for individuals. Due to this acrimony and suspicion the Respondents decided to return these contributions and resign from their positions in *Voices for Stratford PAC*.

8. Respondents set forth a timeline of events:

- September 20, 2019, *Voices for Stratford PAC* deputy treasurer Stephanie Philips received four \$1,000 contributions and sent an email to both Respondents alerting them to this.
- September 21, 2019, Ms. Philips called Respondent Tracy. This phone call caused alarm for Respondent Tracy. Respondent Tracy called Ms. Philips later that day and they had a "heated exchange." Respondent Tracy stated she had to return any inappropriate money and told Ms. Philips both Respondents would resign. Both Respondents had a conversation later that day, and both agreed to return the suspected inappropriate contributions.
- September 22, 2019, according to Respondent Tracy both Respondents called Ms. Philips to request the check book so Respondent Tracy could write the checks

returning the suspicious contributions. This request was met with great displeasure by Ms. Philips.

- September 23, 2019, Respondent Tracy ordered new checks from Webster Bank.
- September 24, 2019, both Respondents announce they would be resigning the following week. Ms. Philips was out of town that week, and the Respondents allowed her to return before resigning. Also on this day, Respondent Tracy wrote checks returning the suspicious contributions. Respondent Tracy used the checks she ordered on September 23<sup>rd</sup> to do so.
- September 30, 2019, both Respondents officially resign as officers of *Voices for Stratford PAC*.

9. After the investigation, Commission investigators could not find the Respondents violated General Statutes §9-622. Respondents acted on their suspicions, disgorged any suspicious contributions, and resigned from their respective roles. It took four days from the receipt of the suspicious contributions and the disgorgement.
10. Based upon the forgoing, it is the determination of the Commission that this matter should be dismissed.

**ORDER**

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

That this matter be dismissed.

Adopted this 1<sup>st</sup> day of February 2023 at Hartford, Connecticut by vote of the Commission.



Commissioner Steward E. P. Kennedy  
By Order of the Commission