

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint by Christine M. Gianquinto,
Joseph G. Soucie, and Mary Jo K. Nosal
Old Lyme

File No. 2021-200

AGREEMENT CONTAINING A CONSENT ORDER

This Agreement by and between Timothy C. Griswold, Town of Old Lyme, State of Connecticut, hereinafter referred to as Respondent, and the undersigned authorized representative of the State Elections Enforcement Commission, is entered into in accordance with Connecticut General Statutes § 4-177 (c) and Regulations of Connecticut State Agencies § 9-7b-54. In accordance herewith, the parties agree that:

1. Complainants filed this complaint on November 18, 2021, alleging that Timothy Griswold of Old Lyme had violated General Statutes § 9-606 (d), when he served as treasurer of the Old Lyme Republican Town Committee while it was financing his campaign for first selectman.
2. Griswold has served as treasurer of the Old Lyme Republican Town Committee since 2012.
3. In 2021, he registered as a candidate for first selectman in Old Lyme, stating that he was exempt from forming a candidate committee because he was being funded by the Old Lyme Republican Town Committee.
4. Mailers, signs, and other printed materials promoting election of the Republican slate in Old Lyme include the disclaimer "Paid for by the Old Lyme Republican Town Committee. Tim Griswold, treasurer." Some add "Approved by Tim Griswold." During the 2021 election cycle, the Old Lyme Republican Town Committee spent approximately \$12,000 to promote the municipal slate committee, which included Griswold.
5. General Statutes § 9-606 (d) prevents a candidate from acting as ^{his or} her own treasurer. The Commission has advised treasurers of town committees to refrain from acting as treasurer when they themselves are candidates running as part of a slate fully funded by the town committee. When that occurs, the town committee treasurer must resign – either temporarily or permanently – or the treasurer's candidacy must be funded through another mechanism.

6. The Commission publishes publicly available advice pertaining to its application of the law regarding who may not serve as a treasurer or deputy treasurer in the party committee guide. Specifically, the Commission advises that in the event that a candidate has authorized a town committee to be his or her sole funding source, any such individual who is also its treasurer "...must immediately resign as treasurer or deputy treasurer."¹
7. The Commission has prior cases regarding alleged violations of General Statutes § 9-606 (d) and the prohibition against an individual serving as their own treasurer. Specifically, such cases have included town committee treasurers who designate that same party committee to be the funding sources of their campaigns.² In each instance, the Commission has consistently found that individuals cannot at the same time serve as party (town) committee treasurers and designate such committees as their funding sources for an election.
8. Griswold responded to the complaint, stating that he did not know that he could not serve as treasurer of the town committee when it was funding his candidacy. He acknowledged that it was an error and noted that this was the first time in his nine years as treasurer of the town committee that anyone had raised this issue.
9. Respondent admits 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.
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.
11. It is understood and agreed that this Agreement will be submitted to the Commission for consideration at its next meeting and, if the Commission does not accept it, it is withdrawn and may not be used as an admission by the Respondent in any subsequent hearing, if the same becomes necessary.

¹ See Understanding the Connecticut Campaign Finance Laws: A Guide for Party (Town and State Central) Committees (Connecticut State Elections Enforcement Commission), Hartford, Connecticut, January 2021, at page 10.

² See In the Matter of a Complaint by Steve L. Smock, Baltic, File No. 2005-261 and In the Matter of a Complaint by Katherine G. Grace, Beacon Falls, File No. 2005-282.

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ENFORCEMENT COMMISSION

ORDER

IT IS HEREBY ORDERED THAT the Respondent, Timothy Griswold, shall pay a civil penalty of \$200 for serving as town committee treasurer while that committee was simultaneously funding his candidacy for first selectman as part of a slate committee.

The Respondent

For the State of Connecticut

By:



By:



Timothy Griswold
13 Griswold Point
Old Lyme, CT 06371

Michael J. Brandi, Esq.
Executive Director and General Counsel and
Authorized Representative of the
State Elections Enforcement Commission
20 Trinity St., Suite 101
Hartford, CT 06106

Dated:

15 Nov 22

Dated:

12/2/22

Adopted this _____ day of _____, 2022 at Hartford, Connecticut by vote of the Commission.

Commissioner
By Order of the Commission

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Michael J. Brandi, Esq.
Executive Director and General Counsel and
Authorized Representative of the
State Elections Enforcement Commission
20 Trinity St., Suite 101
Hartford, CT 06106

Dated: 15 Nov 22

Dated: 12/2/22

Adopted this 21st day of Dec., 2022 at Hartford, Connecticut by vote of the Commission.



Commissioner
By Order of the Commission