

**STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION**

In re. SEEC Initiated *Stevenson4CT* – Audit Findings

File No. 2022-023A

AGREEMENT CONTAINING A CONSENT ORDER

This Agreement by and between Jayme J. Stevenson, Town of Darien, 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. The Commission performed an in-depth review of the expenditures of the *Stevenson4CT* candidate committee after the committee's selection in the random audit lottery conducted following the 2018 election cycle. In January 2018, Jayme J. Stevenson established the candidate committee to support her nomination for election as a candidate for Lieutenant Governor. The candidate named Michele L. Berardo as the committee's treasurer and Elizabeth P. Smith as the committee's deputy treasurer. The committee opted to participate in the Citizens' Election Program. The committee received grant funds totaling \$404,150 on July 26, 2018. The committee returned a surplus to the Citizens' Election Fund on December 11, 2018 in amount of \$50.00 and March 12, 2019 in an amount of \$15.35.
2. The Commission opened an enforcement matter against the candidate and treasurer based on payment that the committee made to the candidate's daughter.
3. The audit of the candidate committee's documentation revealed that the Stevenson candidate committee paid a total of \$2,500 to Charlett Stevenson, who is the candidate's daughter, and for these services Charlett Stevenson provide the campaign with an invoice from the Hat Factory, which is a digital marketing and social media firm founded by BJ Scott and Charlett Stevenson. The committee contracted with Hat Factory for social media and photography services in the summer of 2018 from July 1, 2018 until November 30, 2018. The invoice states, "term of service is for 5 months of work, ending November 30th, 2018," and billed \$1,000 for event photography and \$1,500 for social media services.
4. General Statutes § 9-607 (g) states that candidate committees may make payments for "compensation for campaign or committee staff, fringe benefits and payroll taxes, provided the candidate and any member of his immediate family shall not receive compensation."
5. With the adoption of the Citizens' Election Program, however, the legislature instructed the Commission to draft regulations related to the types of expenditures that qualified candidate committees were permitted to make using their grant monies obtained from the Citizens' Election Fund.
6. The Commission adopted regulations outlining those restrictions, specifically Section 9-706-2 of the Regulations of Connecticut State Agencies, which provides, in relevant part:

(b) . . . Participating candidates and the treasurers of such participating candidates shall not spend funds in the participating candidate's depository account for the following:

. . .

3. Payments to . . . the participating candidate's family members, including: a participating candidate's spouse, civil union partner, sibling, child, grandchild, parent, grandparent, aunt, uncle; or the participating candidate's spouse's or civil union partner's sibling, child, grandchild, parent, grandparent, aunt, uncle; or the spouse, civil union partner, or child of any such individuals related to the participating candidate or his/her spouse or civil union partner, . . .

4. Payments to any entity in which the participating candidate or the participating candidate's family members, as listed in section 9-706-2(b)(3) of the Regulations of Connecticut State Agencies, has a 5% or greater ownership interest; . . .

7. The Commission has enforced this prohibition on payments to a qualified candidate committee's family member previously by seeking restitution from the candidate to the Citizens' Election Fund of an amount equal to the impermissible payment.
8. The Commission finds that the candidate committee paid the candidate's family member, and the entity, which the candidate's family member had greater than 5% ownership interest in, \$2,500 in violation of Commission regulations.
9. The candidate bears the responsibility to reimburse the fund for any "impermissible expenditures" that a qualified candidate committee made. Stevenson acknowledged that liability when she declared herself a "participating candidate" and agreed to operate under the terms of the Citizens' Election Program. In this case, the payments to a family members would be impermissible expenditures and the candidate would need to return the money spent on those items to the Citizens' Election Fund.
10. Based on the Commission's findings, it shall seek reimbursement from candidate Stevenson to the Citizens' Election Fund a total of \$2,500, which represents the amount of impermissible payment made by her candidate committee.
11. 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.
12. 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.
13. 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.

ORDER

IT IS HEREBY ORDERED THAT the Respondent Jayme J. Stevenson shall reimburse the Citizens' Election Fund a total of \$2,500 for impermissible expenditure made by her candidate committee during the 2018 election cycle.

The Respondent

For the State of Connecticut

By:





1/31/23

Jayne J. Stevenson
65 St. Nicholas Rd.
Darien, CT

Dated: 1/26/23

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

Commissioner
By Order of the Commission

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File No: 2022-023A

Jayne J. Stevenson
65 St. Nicholas Rd.
Darien, CT

Dated: 1/26/23

Adopted this 1st day of Feb., 2022 at Hartford, Connecticut by vote of the Commission.


Commissioner Stephen T. Hannon
By Order of the Commission

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