

SEEC FORM CEP 15

Citizens' Election Program-Application for Grant
CONNECTICUT STATE ELECTIONS ENFORCEMENT COMMISSION
 Revised May 2022



For Internal Use ONLY

CODE: REVIEWED BY: *MW*

APPLICATION TYPE

INITIAL
 AMENDED

**CITIZENS' ELECTION PROGRAM APPLICATION
 FOR PUBLIC GRANT DOLLARS**

Statewide Office and General Assembly Candidates

The candidate and the campaign treasurer must each review all information provided on this Application, and sign or initial the designated lines. Any deputy treasurer designated by the candidate must complete and sign the Deputy Treasurer Certification.

SECTION A. Identifying Information

1. ELECTION DATE	2. OFFICE SOUGHT	3. DISTRICT NUMBER
(mm/dd/yyyy) <i>11/03/2026</i>	<i>State Representative</i>	(If applicable) <i>47</i>

4. CANDIDATE NAME			
First Name <i>Marcus</i>	MI	Last Name <i>Palumbo</i>	Suffix

5. COMMITTEE NAME
<i>Citizens for Lower Costs</i>

6. TREASURER NAME			
First Name <i>Linda</i>	MI	Last Name <i>Theodoru</i>	Suffix

7. DEPUTY TREASURER NAME			
First Name <i>Kathryn</i>	MI	Last Name <i>Exbersc</i>	Suffix

SECTION B. Continuation Without Prejudice — OPTIONAL

If, upon review, the application is not yet sufficient to qualify for payment of a grant, the candidate hereby requests that the Commission delay its determination, and continue the matter without prejudice pending further review of a supplemental submission filed in accordance with the schedule included in General Statutes § 9-706.

Marcus Palumbo

 CANDIDATE SIGNATURE

6/7/2026

 DATE (mm/dd/yyyy)

RECEIVED
 SEEC
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SECTION C. Candidate Certification

The candidate must read each paragraph below, provide any and all information requested, and indicate agreement to each numbered paragraph by writing their initials at each number below. Applications missing the initials for any item will not be deemed complete.

MJP
Initials

1. I certify that I am over 18 years of age and believe in and understand the obligation of an oath. I hereby affirm, certify, and state that as a candidate who has elected to participate in the Citizens' Election Program (the "Program"), I understand my obligations to abide by and will abide by the Program's requirements, including the Program's expenditure limits.

MJP
Initials

2. I certify that I understand that I am required to read, understand, and comply with the requirements of the Program, including all applicable statutes, regulations, and/or declaratory rulings. I certify that I understand that my failure to abide by the requirements of all applicable statutes and regulations relating to the Program may result in the SEEC's imposition of penalties as provided in Chapters 155 and 157 of the Connecticut General Statutes. I certify that I understand that I shall be personally liable for penalties relating to violations of the Program requirements, by myself, my agents, and/or anyone acting under my explicit or implied direction.

MJP
Initials

3. I certify that either I have not formed an exploratory committee in this election cycle, or if an exploratory committee was formed in this election cycle, any assets or debts carried forward from the exploratory committee to this candidate committee have been disclosed in a "carry forward" letter filed with the Commission. I certify that if an exploratory committee was formed in this election cycle which had no debts or assets carried forward from the exploratory to the candidate's candidate committee, that this fact has been disclosed in a "carry forward" letter filed with the Commission.

MJP
Initials

4. I certify that my candidate committee has received the required amount of qualifying contributions. I further certify that my candidate committee has returned or transmitted to the Citizens' Election Fund all contributions or portions of contributions that do not meet the criteria for qualifying contributions under General Statutes § 9-704 and transmitted all excess qualifying contributions to the Citizens' Election Fund. I further certify that my candidate committee will expend any moneys received from the Citizens' Election Fund in accordance with the provisions of General Statutes § 9-607 (g), together with any regulations adopted by the SEEC under General Statutes § 9-706 (e).

MJP
Initials

5. I certify that either I have not accepted any contribution or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes, or I have returned any previously accepted contribution, portion of a contribution, or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes. I further certify that my candidate committee has repaid all moneys borrowed on behalf of the campaign, as required by General Statutes § 9-710 (b).

MJP
Initials

6. I certify that I have not accepted or have returned any previously accepted contributions from any sources not authorized under Chapter 157 of the Connecticut General Statutes, including contributions from individuals who do not include names and addresses. I further certify that either my committee has not received any impermissible in-kind contributions (including coordinated expenditures) from any committee or person, or, if my committee has received any in-kind contributions (including coordinated expenditures), the committee has addressed this with Commission staff and has properly refunded or disgorged (or taken any other applicable steps), and disclosed all such contributions. I certify that my committee will not receive any such contributions (including coordinated expenditures) which are prohibited by the Program. I further certify that I understand that the definition of independent expenditure means an expenditure that is wholly or totally made without the consent, coordination, or consultation of a candidate or committee or agent of the candidate or committee.

CANDIDATE CERTIFICATION CONTINUED ON PAGES 3-4



SECTION C. Candidate Certification *continued*

- MJP
Initials
7. I certify that I have not solicited or received any contributions for any committee to benefit my candidacy, or authorized any other person to solicit or receive such contributions for any committee, other than qualifying contributions for my candidate committee.
- MJP
Initials
8. I certify that I agree to abide by all other applicable requirements relating to Chapters 155 and 157 of the Connecticut General Statutes and SEEC regulations, including requirements for campaign finance disclosure statements and recordkeeping. I certify that I agree to maintain and furnish all records required by the SEEC and to fully participate in the SEEC's review process.
- MJP
Initials
9. I certify that the authorized candidate committee designated in Section A is my sole candidate committee for the election cycle designated in Section A. The candidate committee is (i) the only committee authorized by me to aid or otherwise take part in the election covered by this Application; (ii) is not an authorized committee of any other candidate; and (iii) has not been, is not, and will not be, authorized or otherwise active for any election other than the election covered by this Application. I further certify that all moneys received from the Citizens' Election Fund will be deposited upon receipt into the sole authorized depository account of my sole candidate committee.
- MJP
Initials
10. I certify that I understand that if I have established or control a political committee (i.e., a personal PAC), such political committee has not and will not make any contributions or expenditures to promote or benefit my campaign.
- MJP
Initials
11. I certify that I understand that my completing and filing this Application is a condition for qualifying to receive public funds for the election cycle designated in Section A, and that other conditions specified in the applicable statutes and regulations relating to the Program must be satisfied before I may be eligible to receive public funds pursuant to Chapter 157 of the Connecticut General Statutes.
- MJP
Initials
12. I certify that I understand that my residential address, the candidate committee's address, and the treasurer's residential address, including the e-mail addresses of the candidate and treasurer as reported in the candidate committee registration (SEEC Form 1 and 1A), are the addresses to which legal notices and other communications, including correspondence and legal papers, will be sent. I further understand and agree that if any of these addresses, including telephone numbers and/or e-mail addresses, change in any way, I am responsible for promptly notifying the SEEC by filing an amended registration form with any such changes to these addresses not later than ten calendar days of any such changes.
- MJP
Initials
13. I certify that I understand that if my candidate committee receives a grant, and exceeds any applicable expenditure limit, in addition to any penalties that may be assessed, the SEEC may require that all grant funds received by the committee be returned to the Citizens' Election Fund, and the committee may not be eligible to receive any additional public funds for the election.

CANDIDATE CERTIFICATION CONTINUED ON PAGE 4



SECTION C. Candidate Certification *continued*

MJP
Initials

14. I certify that I understand that I am responsible to have general knowledge and oversight of the actions and conduct of my candidate committee, including knowledge and oversight of contributions made to my candidate committee, moneys deposited into my candidate committee's authorized depository account, expenditures made or incurred by or on behalf of my candidate committee, and disclosure obligations of my treasurer.

MJP
Initials

15. I certify that I understand that intentionally making a false written statement pursuant to a form bearing notice, authorized by law, which I do not believe to be true and which is intended to mislead a public servant in the performance of his or her official function, is a Class A misdemeanor pursuant to General Statutes § 53a-157b (a), and may subject me to criminal penalties, including but not limited to, imprisonment for up to one year and/or a fine of up to \$2,000.

MJP
Initials

16. I certify that all outstanding civil penalties or forfeitures assessed pursuant to Chapters 155 to 157, inclusive, of the General Statutes, against my current or any former committee of mine have been paid, provided (A) if I am seeking nomination for or election to statewide office (Governor, Lieutenant Governor, Attorney General, State Comptroller, Secretary of the State or State Treasurer), any such penalty or forfeiture was assessed not later than 24 months prior to the submission of my grant application; or (B) if I am seeking nomination for or election to the office of state senator or state representative, any such penalty or forfeiture was assessed not later than 12 months prior to the submission of my grant application.

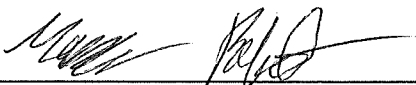
MJP
Initials

17. I certify that I have not been convicted of or pled guilty or nolo contendere to, in a court of competent jurisdiction, (A) any criminal offense under Title 9 of the General Statutes, or that at least eight years have elapsed from the date of any conviction, or plea or the completion of any sentence, without a subsequent conviction of or plea to another such offense; or (B) a felony related to my public office, other than an offense described in subsection A above.

MJP
Initials

18. I certify that I have never been convicted of or pled guilty or nolo contendere to, in a court of competent jurisdiction, a felony related to my public office, other than a criminal offense under Title 9 of the General Statutes in accordance with and as described in Certification 17 of Candidate Certifications of this form.

I hereby swear, under penalty of false statement, that the above certifications are true and complete.



CANDIDATE SIGNATURE

6/7/2026
DATE (mm/dd/yyyy)



SECTION D. Treasurer Certification

The treasurer must read each paragraph below, provide any and all information requested, and indicate agreement to each numbered paragraph by writing their initials at each number below. Applications missing initials for any item will not be deemed complete.

LEF
Initials

1. I certify that I am over 18 years of age and believe in and understand the obligation of an oath. I hereby affirm, certify, and state that as the treasurer for a candidate who has elected to participate in the Citizens' Election Program (the "Program"), I understand my obligations to abide by and will abide by the Program's requirements, including the Program's expenditure limits.

LEF
Initials

2. I certify that I understand that I am required to read, understand, and comply with the requirements of the Program, including all applicable statutes, regulations, and/or declaratory rulings. I certify that I understand that my failure to abide by the requirements of all applicable statutes and regulations relating to the Program may result in the SEEC's imposition of penalties as provided in Chapters 155 and 157 of the Connecticut General Statutes. I certify that I understand that I shall be personally liable for penalties relating to violations of the Program requirements, by myself, my agents, and/or anyone acting under my explicit or implied direction.

LEF
Initials

3. I certify that either the candidate has not formed an exploratory committee in this election cycle, or if an exploratory committee was formed in this election cycle, any assets or debts carried forward from the exploratory committee to this candidate committee have been disclosed in a "carry forward" letter filed with the Commission. I certify that if an exploratory committee was formed in this election cycle which had no debts or assets carried forward from the exploratory to the candidate's candidate committee, that this fact has been disclosed in a "carry forward" letter filed with the Commission.

LEF
Initials

4. I certify that the candidate committee named in Section A has received the required amount of qualifying contributions. I further certify that the candidate committee has returned or transmitted to the Citizens' Election Fund all contributions or portions of contributions that do not meet the criteria for qualifying contributions under General Statutes § 9-704 and transmitted all excess qualifying contributions to the Citizens' Election Fund. I further certify that the candidate committee named in Section A will expend any moneys received from the Citizens' Election Fund in accordance with the provisions of General Statutes § 9-607 (g), together with any regulations adopted by the SEEC under General Statutes § 9-706 (e).

LEF
Initials

5. I certify that either I have not accepted any contribution or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes, or I have returned any previously accepted contribution, portion of a contribution, or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes. I further certify that the candidate committee named in Section A has repaid all moneys borrowed on behalf of the campaign, as required by General Statutes § 9-710 (b).

LEF
Initials

6. I certify that I have not accepted or have returned any previously accepted contributions from any sources not authorized under Chapter 157 of the Connecticut General Statutes, including contributions from individuals who do not include names and addresses. I further certify that either the candidate committee named in Section A has not received any impermissible in-kind contributions (including coordinated expenditures) from any committee or person, or, if the candidate committee has received any in-kind contributions (including coordinated expenditures), the committee has addressed this with Commission staff and has properly refunded or disgorged (or taken any other applicable steps), and disclosed all such contributions. I certify that the candidate committee named in Section A will not receive any such contributions (including coordinated expenditures) which are prohibited by the Program. I further certify that I understand that the definition of independent expenditure means an expenditure that is wholly or totally made without the consent, coordination, or consultation of a candidate or committee or agent of the candidate or committee.

TREASURER CERTIFICATION CONTINUED ON PAGES 6-7



SECTION D. Treasurer Certification

LEF
Initials

7. I certify that I have not solicited or received any contributions to benefit the candidacy of the candidate who formed the candidate committee named in Section A, or authorized any other person to solicit or receive such contributions, other than qualifying contributions for the candidate committee named in Section A.

LEF
Initials

8. I certify that I understand that if I have established or control a political committee, such political committee cannot make any contributions or expenditures to promote or benefit the candidate committee named in Section A.

LEF
Initials

9. I certify that I agree to abide by all other applicable requirements relating to Chapters 155 and 157 of the Connecticut General Statutes and SEEC regulations, including requirements for campaign finance disclosure statements and recordkeeping. I certify that I agree to maintain and furnish all records required by the SEEC and to fully participate in the SEEC's review process.

LEF
Initials

10. I certify that all moneys received from the Citizens' Election Fund will be deposited upon receipt into the sole authorized depository account of the candidate committee designated in Section A.

LEF
Initials

11. I certify that I understand that my completing and filing this Application is a condition for qualifying to receive public funds for the election cycle designated in Section A, and that other conditions specified in the applicable statutes and regulations relating to the Program must be satisfied before the candidate committee may be eligible to receive public funds pursuant to Chapter 157 of the Connecticut General Statutes.

LEF
Initials

12. I certify that I understand that my residential address, the candidate committee's address, and the candidate's residential address, including the e-mail addresses of the candidate and treasurer as reported in the candidate committee registration (SEEC Form 1 and 1A), are the addresses to which legal notices and other communications, including correspondence and legal papers, will be sent. I further understand and agree that if any of these addresses, including telephone numbers and/or e-mail addresses, change in any way, I am responsible for promptly notifying the SEEC, in writing, and that the candidate must file an amended registration form with any such changes to these addresses not later than ten calendar days of any such changes.

LEF
Initials

13. I certify that I understand that if the candidate committee receives a grant, and exceeds any applicable expenditure limit, in addition to any penalties that may be assessed, the SEEC may require that all grant funds received by the committee be returned to the Citizens' Election Fund, and the committee may not be eligible to receive any additional public funds for the election.

TREASURER CERTIFICATION CONTINUED ON PAGE 7



SECTION D. Treasurer Certification *continued*

LEF
Initials

14. I certify that if the candidate withdraws from the campaign, becomes ineligible or dies during the campaign, the candidate committee will return to the SEEC, for deposit in the Citizens' Election Fund, all moneys the committee received from the Fund and which the candidate committee has not spent as of the date of such candidate withdrawal, ineligibility or death.

LEF
Initials

15. I certify that I understand that intentionally making a false written statement pursuant to a form bearing notice, authorized by law, which I do not believe to be true and which is intended to mislead a public servant in the performance of his or her official function, is a Class A misdemeanor pursuant to General Statutes § 53a-157b (a), and may subject me to criminal penalties, including but not limited to, imprisonment for up to one year and/or a fine of up to \$2,000.

LEF
Initials

16. I certify that I have not been convicted of or pled guilty or nolo contendere to, in a court of competent jurisdiction, any (A) felony involving fraud, forgery, larceny, embezzlement or bribery, or (B) criminal offense under Title 9 of the General Statutes, or that at least eight years have elapsed from the date of the conviction or plea or the completion of any sentence, whichever date is later, without a subsequent conviction of or plea to another such felony or offense.

LEF
Initials

17. I certify that I have paid any civil penalties or forfeitures assessed pursuant to chapters 155 to 157, inclusive.

LEF
Initials

18. I certify that I am not barred from serving as treasurer by order of the State Elections Enforcement Commission.

I hereby swear, under penalty of false statement, that the above certifications are true and complete.

John E. Harbore

TREASURER SIGNATURE

6/7/2026

DATE (mm/dd/yyyy)



SECTION E. Deputy Treasurer Certification

The deputy treasurer must read each paragraph below, provide any and all information requested, and indicate agreement to each numbered paragraph by writing their initials at each number below. Applications missing initials for any item will not be deemed complete.

In the event I become responsible for discharging any of the duties required of the treasurer:

KE
Initials

1. I certify that I am over 18 years of age and believe in and understand the obligation of an oath. I hereby affirm, certify, and state that as the deputy treasurer for a candidate who has elected to participate in the Citizens' Election Program (the "Program"), I understand my obligations to abide by and will abide by the Program's requirements, including the Program's expenditure limits.

KE
Initials

2. I certify that I understand that I am required to read, understand, and comply with the requirements of the Program, including all applicable statutes, regulations, and/or declaratory rulings. I certify that I understand that my failure to abide by the requirements of all applicable statutes and regulations relating to the Program may result in the SEEC's imposition of penalties as provided in Chapters 155 and 157 of the Connecticut General Statutes. I certify that I understand that I shall be personally liable for penalties relating to violations of the Program requirements, by myself, my agents, and/or anyone acting under my explicit or implied direction.

KE
Initials

3. I certify that either the candidate has not formed an exploratory committee in this election cycle, or if an exploratory committee was formed in this election cycle, any assets or debts carried forward from the exploratory committee to this candidate committee have been disclosed in a "carry forward" letter filed with the Commission. I certify that if an exploratory committee was formed in this election cycle which had no debts or assets carried forward from the exploratory to the candidate's candidate committee, that this fact has been disclosed in a "carry forward" letter filed with the Commission.

KE
Initials

4. I certify that the candidate committee named in Section A has received the required amount of qualifying contributions. I further certify that the candidate committee has returned or transmitted to the Citizens' Election Fund all contributions or portions of contributions that do not meet the criteria for qualifying contributions under General Statutes § 9-704 and transmitted all excess qualifying contributions to the Citizens' Election Fund. I further certify that the candidate committee named in Section A will expend any moneys received from the Citizens' Election Fund in accordance with the provisions of General Statutes § 9-607 (g), together with any regulations adopted by the SEEC under General Statutes § 9-706 (e).

KE
Initials

5. I certify that either I have not accepted any contribution or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes, or I have returned any previously accepted contribution, portion of a contribution, or contributions that exceed or exceeds in the aggregate the applicable contribution limit set forth in Chapter 157 of the Connecticut General Statutes. I further certify that the candidate committee named in Section A has repaid all moneys borrowed on behalf of the campaign, as required by General Statutes § 9-710 (b).

DEPUTY TREASURER CERTIFICATION CONTINUED ON PAGES 9-10



SECTION E. Deputy Treasurer Certification *continued*

- KE
Initials 6. I certify that I have not accepted or have returned any previously accepted contributions from any sources not authorized under Chapter 157 of the Connecticut General Statutes, including contributions from individuals who do not include names and addresses. I further certify that either the candidate committee named in Section A has not received any impermissible in-kind contributions (including coordinated expenditures) from any committee or person, or, if the candidate committee has received any in-kind contributions (including coordinated expenditures), the committee has addressed this with Commission staff and has properly refunded or disgorged (or taken any other applicable steps), and disclosed all such contributions. I certify that the candidate committee named in Section A will not receive any such contributions (including coordinated expenditures) which are prohibited by the Program. I further certify that I understand that the definition of independent expenditure means an expenditure that is wholly or totally made without the consent, coordination, or consultation of a candidate or committee or agent of the candidate or committee.
- KE
Initials 7. I certify that I have not solicited or received any contributions to benefit the candidacy of the candidate who formed the candidate committee named in Section A, or authorized any other person to solicit or receive such contributions, other than qualifying contributions for the candidate committee named in Section A.
- KE
Initials 8. I certify that I understand that if I have established or control a political committee, such political committee cannot make any contributions or expenditures to promote or benefit the candidate committee named in Section A.
- KE
Initials 9. I certify that I agree to abide by all other applicable requirements relating to Chapters 155 and 157 of the Connecticut General Statutes and SEEC regulations, including requirements for campaign finance disclosure statements and recordkeeping. I certify that I agree to maintain and furnish all records required by the SEEC and to fully participate in the SEEC's post-election review process.
- KE
Initials 10. I certify that all moneys received from the Citizens' Election Fund will be deposited upon receipt into the sole authorized depository account of the candidate committee designated in Section A.
- KE
Initials 11. I certify that I understand that my completing and filing this Application is a condition for qualifying to receive public funds for the election cycle designated in Section A, and that other conditions specified in the applicable statutes and regulations relating to the Program must be satisfied before the candidate committee may be eligible to receive public funds pursuant to Chapter 157 of the Connecticut General Statutes.
- KE
Initials 12. I certify that I understand that my residential address, the candidate committee's address, and the candidate's residential address, including the e-mail addresses as reported in the candidate committee registration (SEEC Form 1 and 1A), are the addresses to which legal notices and other communications, including correspondence and legal papers, will be sent. I further understand and agree that if any of these addresses, including telephone numbers and/or e-mail addresses, change in any way, I am responsible for promptly notifying the SEEC, in writing, and that the candidate must file an amended registration form with any such changes to these addresses not later than ten calendar days of any such changes.

DEPUTY TREASURER CERTIFICATION CONTINUED ON PAGE 10



SECTION E. Deputy Treasurer Certification *continued*

- KE
Initials 13. I certify that I understand that if the candidate committee receives a grant, and exceeds any applicable expenditure limit, in addition to any penalties that may be assessed, the SEEC may require that all grant funds received by the committee be returned to the Citizens' Election Fund, and the committee may not be eligible to receive any additional public funds for the election.
- KE
Initials 14. I certify that if the candidate withdraws from the campaign, becomes ineligible or dies during the campaign, the candidate committee will return to the SEEC, for deposit in the Citizens' Election Fund, all moneys the committee received from the Fund and which the candidate committee has not spent as of the date of such candidate withdrawal, ineligibility or death.
- KE
Initials 15. I certify that I understand that intentionally making a false written statement pursuant to a form bearing notice, authorized by law, which I do not believe to be true and which is intended to mislead a public servant in the performance of his or her official function, is a Class A misdemeanor pursuant to General Statutes § 53a-157b (a), and may subject me to criminal penalties, including but not limited to, imprisonment for up to one year and/or a fine of up to \$2,000.
- KE
Initials 16. I certify that I have not been convicted of or pled guilty or nolo contendere to, in a court of competent jurisdiction, any (A) felony involving fraud, forgery, larceny, embezzlement or bribery, or (B) criminal offense under Title 9 of the General Statutes, or that at least eight years have elapsed from the date of the conviction or plea or the completion of any sentence, whichever date is later, without a subsequent conviction of or plea to another such felony or offense.
- KE
Initials 17. I certify that I have paid any civil penalties or forfeitures assessed pursuant to chapters 155 to 157, inclusive.
- KE
Initials 18. I certify that I am not barred from serving as deputy treasurer by order of the State Elections Enforcement Commission.

I hereby swear, under penalty of false statement, that the above certifications are true and complete.

Kathryn Eberse
DEPUTY TREASURER SIGNATURE

6/7/26
DATE (mm/dd/yyyy)