

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint filed by Eduardo Terrelba, East Haven File No. 2023-007

FINDINGS AND CONCLUSIONS

Complainant Eduardo Terrelba of East Haven filed this complaint pursuant to General Statutes § 9-7b, alleging that Ms. Holly Bryk, former Chairman of the East Haven Republican Town Committee was soliciting and receiving contributions through a website she created without proper authorization. After its investigation, the Commission makes the following findings and conclusions:

1. Eduardo Terrelba, former Treasurer of the of East Haven Republican Town Committee (EHRTC) filed this complaint on February 6, 2023 alleging that Ms. Holly Bryk, former Chairman of the EHRTC solicited, and may have received contributions for the EHRTC through a website she created without proper authorization.

Applicable Law

2. General Statutes §9-602(b), provides in pertinent part:

No contribution in aid of or in opposition to the candidacy of any person or to any party or referendum question shall be made at any time, except to the committee's treasurer whose designation is on file with the proper authority, a solicitor or a candidate who is exempt from the requirement to form a candidate committee and has filed a certification.

3. General Statutes §9-606(c), provides in pertinent part:

The treasurer of each committee, other than a political committee established by an organization which receives its funds from the organization's treasury, may appoint solicitors. If solicitors are appointed, the treasurer shall receive and report all contributions made or promised to each solicitor. Each solicitor shall submit to the treasurer a list of all contributions made or promised to him. The list shall be complete as of seventy-two hours immediately preceding midnight of the day preceding the dates on which the treasurer is required to file a sworn statement as provided in section 9-608. Lists shall be received by the treasurer not later than twenty-four hours immediately preceding each required filing date. Each solicitor shall deposit all contributions with the treasurer, within seven days after receipt. No solicitor shall expend any contributions received by him or disburse such contributions to any person other than the treasurer.

Facts After Investigation

4. Statements read and interviews conducted over the course of the investigation indicate that the idea of creating a website for the EHRTC which had the ability to solicit donations was first discussed in 2019. Several people were involved with the website project since its inception, including one individual who is now deceased. After the death of the last point-person for the website, the Respondent, who is a former Chairman of the EHRTC, took up the project and worked with a domain registration and website creation company, Go Daddy, to bring the project forward.
5. Based on statements and interviews it appears that there had been confusion as to whether the creation and activation of the website ever moved past the discussion and planning stages and had been formally voted on and approved by the EHRTC membership. The committee ultimately determined that though there had been considerable discussion about the website, a formal vote on approval was never held.
6. In response to the Complaint the Respondent asserts that she believed she was authorized by the EHRTC to create a website stating:

Please find attached an email from June 2019 from the East Haven Republican Town Committee E Board which discussed the new website. Also attached are the EHRTC meeting minutes from January 2023 authorizing the reimbursement for the website and the Treasurer's Report regarding same. This evidence shows that at no time did I take it upon myself to make a website for the EHRTC without prior authorization.

I have also enclosed correspondence from PayPal showing that no monies were ever received by me or my company for the website by way of donations. Further, it was explained to me by PayPal that the donate button would have been a broken link since the Treasurer never set up a PayPal account for the EHRTC and therefore, no one could have donated through this website. I did clarify this at the January meeting that I never received any donations from the Website on behalf of the EHRC.

7. On January 17, 2023 the EHRTC held its monthly meeting, at which a motion was made to reimburse the Respondent the amount of \$204.06 for expenses pertaining to the EHRTC website. Following the motion discussion was held concerning past approval of the website, and best practices with regard to the website going forward. The motion passed with one abstention. Following the vote Eduardo Terrelba (Complainant in this case) resigned as treasurer of the EHRTC.

8. Notwithstanding confusion regarding the validity of the website, statements and interviews conducted during the investigation uniformly indicate that no donations or contributions were received by the EHRTC through the website. Further, the donation button contained on the website was never activated or attached to a bank account.
9. Based on review of EHRTC meeting records, email correspondence, statements and interviews with the Respondent as well as current and former EHRTC members and officers, the Commission finds no evidence that contributions were ever collected through the EHRTC website, and therefore no violation occurred.
10. The Commission therefore dismisses the allegations against the Respondent based on a lack of evidence to establish a violation of General Statutes § 9-602(b).

ORDER

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

This matter is dismissed

Adopted this 6th day of September 2023 at Hartford, Connecticut by vote of the Commission.



Stephen T. Penny, Chairman
By Order of the Commission