

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

In the Matter of a Complaint by Robert Natt  
Easton

File No. 2023-013

**AGREEMENT CONTAINING A CONSENT ORDER**

This Agreement by and between June Logie, Town of Easton, 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. Complainant Robert Natt filed this complaint on March 13, 2023, alleging that the Citizens for Responsible Government (the “Committee”) had failed to follow Connecticut’s campaign finance laws. Complainant named Committee treasurer, June Logie, and Committee president, Sherry Harris, as respondents in this matter.
2. Complainant charged, among other things, that Citizens for Responsible Government had potentially accepted impermissible or excessive contributions related to contributions received through GoFundMe and PayPal and had failed to include required contributor information on Committee financial disclosures.
3. The commission docketed this matter and investigated the allegations raised in the complaint. Respondents Logie and Harris were cooperative over the course of the investigation.

Law and Guidance

4. Treasurers have numerous duties and obligations imposed upon them by chapter 155 of the General Statutes.
5. General Statutes § 9-606 (a) requires a treasurer, among other things, to report all contributions and expenditures as specified in section 9-608 on periodic campaign finance disclosure statements and to keep internal records of each entry made on those statements.
6. General Statutes § 9-607 (f) requires a treasurer to preserve all internal records of transactions filed on campaign finance disclosure reports for four years from the date that the transaction was reported.

7. General Statutes § 9-608 requires a treasurer of a committee to list each contributor's name and address as well as the amount they are contributing, as well as details about any expenditure that the committee makes. Specifically, the statutes require that:

Each statement filed under subsection (a), (e) or (f) of this section shall include, but not be limited to: (A) An itemized accounting of each contribution, if any, including the full name and complete address of each contributor and the amount of the contribution; (B) an itemized accounting of each expenditure, if any, including the full name and complete address of each payee, including secondary payees whenever the primary or principal payee is known to include charges which the primary payee has already paid or will pay directly to another person, vendor or entity, the amount and the purpose of the expenditure, the candidate supported or opposed by the expenditure, whether the expenditure is made independently of the candidate supported or is an in-kind contribution to the candidate, and a statement of the balance on hand or deficit, as the case may be; (C) an itemized accounting of each expense incurred but not paid, provided if the expense is incurred by use of a credit card, the accounting shall include secondary payees, and the amount owed to each such payee; . . . (F) for each individual who contributes in excess of one hundred dollars but not more than one thousand dollars, in the aggregate, to the extent known, the principal occupation of such individual and the name of the individual's employer, if any; (G) for each individual who contributes in excess of one thousand dollars in the aggregate, the principal occupation of such individual and the name of the individual's employer, if any; (H) for each itemized contribution made by a lobbyist, the spouse of a lobbyist or any dependent child of a lobbyist who resides in the lobbyist's household, a statement to that effect; and (I) for each individual who contributes in excess of four hundred dollars in the aggregate to or for the benefit of any candidate's campaign for nomination at a primary or election to the office of chief executive officer or a slate or town committee financing the nomination or election or a candidate for chief executive officer of a town, city or borough, a statement indicating whether the individual or a business with which he is associated has a contract with said municipality that is valued at more than five thousand dollars. . . .

(2) Each contributor described in subparagraph (F), (G), (H) or (I) of subdivision (1) of this subsection shall, at the time the contributor makes such a contribution, provide the information that the treasurer is required to include under said subparagraph in the statement filed under subsection (a), (e) or (f) of this section. . . .

8. Part I of the SEEC Form 20 financial disclosure requires the treasurer to disclose all contributions and other funds received by the committee in Sections A through K, based

upon the source, amount, and nature of the monetary receipt. Treasurers must deposit contributions and other funds within 20 days of receipt.

9. In Part I, Section A, treasurers are required to report the total amount received from small contributors for the period covered by this statement. A small contributor is an individual who has contributed \$50 or less to date.
10. In Part I, Section B, treasurers are required to report monetary contributions from individuals that are in excess of \$50 in the aggregate to date. Each contribution has to be reported separately and must include the contributor's name and address. For contributors that contribute in excess of \$100.00 in the aggregate, the principal occupation and employer of the contributor must also be reported.
11. A committee may receive contributions from an individual of up to \$100 in cash, and up to committee limits via check or credit card, pursuant to the provisions of General Statutes § 9-611 (d). Online contributions may be collected, but only if the committee gathers the required information from contributors, including, but not limited to, the last four numbers of the credit card number, billing address, and e-mail address of the contributor.
12. The commission provides comprehensive advice about what documentation must be collected from contributors who give through credit card portals<sup>1</sup>. According to the guidebook for political committee treasurers:

When collecting contributions online, the committee must select a merchant account provider that is able to supply the committee with **all** of the below information as completed by the contributor on the online contribution form. A treasurer **must** ensure that the system they choose receives and adequately records for the treasurer's records the following information from the individual contributor, an online merchant provider must separate:

1. Full name of the individual making the contribution;
2. Residence home address, zip code and telephone number of contributor;
3. Billing address on record with card issuer (if different than residence address) or the last four digits of the credit card;
4. Individual's email address;
5. Amount of contribution;

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<sup>1</sup> Understanding the Connecticut Campaign Finance Laws: A Guide for Traditional Political Committees, 43. (Connecticut State Elections Enforcement Commission), Hartford, Connecticut, August 2019.

6. Certification as to whether a contributor is a communicator lobbyist, or member of the immediate family of a communicator lobbyist, for contributions that separately, or in the aggregate, exceed \$50 (best practice is to obtain it at all amounts);
7. Certification that contributor is not a principal of a state contractor or prospective state contractor (which includes spouse and dependent children over eighteen) if the recipient political committee is authorized to make contributions or expenditures to or for the benefit of any candidate seeking office in the branch of government with which the contractor or prospective state contractor is doing or seeking to do business and if contributor's aggregate contributions to the committee exceed \$50 (best practice is to obtain it at all amounts);
8. Principal occupation, to the extent known, if individual's aggregate contributions to the committee exceed \$100 (best practice is to obtain it at all amounts);
9. Name of employer, if individual's aggregate contributions to the committee exceed \$50 (best practice is to obtain it at all amounts);
10. Donor must affirm the statement: "I am 18 years of age or older";
11. Contributor must affirm the statement: "I certify that this contribution is made on my personal credit card for which I have a legal obligation to pay and intend to pay from my own personal funds, is not being reimbursed in any manner, is not being made as a loan, is not an otherwise prohibited contribution, and that payment on this card is not made from the funds of a corporation, labor organization or any other entity"; and
12. Contributor must affirm the statement: "I am either a United States citizen or a foreign national with permanent resident status in the United States."

The guidebook also states that the merchant account provider must segregate any contributions received on behalf of a political committee into a separate account for that committee.

#### Findings After Investigation

13. Commission staff investigated the allegations in the complaint and determined that contributions that were collected by the Committee through GoFundMe and PayPal accounts did not include sufficient information required by General Statutes § 9-608, nor were the majority of contributors using these online portals properly disclosed in the required Committee filings.
14. Though the majority of contributions made through GoFundMe were returned to the original contributors before they were deposited into the Committee's bank account, \$1,553.49 of GoFundMe deposits were made in March of 2021. These contributions,

none of which were itemized in Committee disclosures, lacked sufficient information to satisfy the requirements of General Statutes § 9-608 and § 9-611(d).

15. Similarly, contributions received by the Committee through PayPal lacked sufficient documentation and information to satisfy the requirements of General Statutes § 9-608 and § 9-611(d) and were not all properly disclosed in the Committee filings.
16. Facts after investigation show that between March 22, 2021 and October 26, 2021 the Committee received \$3,140.00 of PayPal contributions. During this period there were 50 donation transactions through PayPal, with 22 of the donations at or above \$100.00. Review of the relevant financial disclosures for this period show that only one (1) of the PayPal donations was itemized, that being a \$200.00 donation on October 19, 2021. That disclosure was itself incomplete, as it contained no information other than the name of the contributor and the amount of the donation.
17. Committee financial disclosures for 2021 show the following:
  - a. The April 10, 2021 SEEC Form 20 disclosure filing the Committee reported \$3,830.26 in contributions from individuals (Sections A&B), but failed to list any contributors or amounts in either Section A or B of the disclosure.
  - b. The July 10, 2021 SEEC Form 20 filing, the Committee reported \$2,978,23 in contributions from individuals (Sections A&B), but only listed \$750.00 of itemized contributions in Sec. B, and no contribution amounts in Section A.
  - c. The October 10, 2021 SEEC Form 20 filing the Committee reported an aggregate amount of \$1651.24 in individual contributions (Sections A&B). Section A of the disclosure identifies \$1,651.24 of “Contributions from Small Contributors”, and Section B of the shows \$1,000.00 of “Itemized Contributions from Individuals”, making either the aggregate amount, or the breakdown of contribution amounts inaccurately reported.
  - d. The January 10, 2022 SEEC Form 20 filing the Committee reported \$5,090.00 in individual contributions (Sections A&B). Section A lists no contribution amount, and Section B discloses one contribution in the amount of \$200.00 with a handwritten notation that indicates it was received through PayPal. Section B of the disclosure contains no address, occupation, or employer information for the contributor.

18. The Respondent acknowledges errors in online donation reporting with PayPal and GoFundMe, but nothing discovered during the investigation indicates that there was any misappropriation of funds.

Conclusion

19. Based on the foregoing the Commission finds that Respondent, as treasurer for the committee, did not gather the information necessary to complete the SEEC Form 20 and provide that information in the relevant campaign finance disclosure reports in accordance with General Statutes § 9-608 and § 9-611(d), and failed to properly disclose contributions received by the Committee in either amount or source in accordance with the provisions of General Statutes § 9-608.

20. 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.

21. 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.

22. 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, June Logie, shall pay a civil penalty of \$400.00 for failing to follow the reporting guidelines in General Statutes § 9-608 and § 9-611(d) and shall agree to follow those provisions in the future.

The Respondent

For the State of Connecticut

By: \_\_\_\_\_

*June Chian-Logie*

June Logie  
140 Rock House Road  
Easton, CT 06612

By: \_\_\_\_\_

*Michael J. Brandi*

Michael J. Brandi, Esq.  
Executive Director and General Counsel and  
Authorized Representative of the  
State Elections Enforcement Commission  
55 Farmington Avenue, 8<sup>th</sup> Floor  
Hartford, CT 06106

Dated: March 20, 2024

Dated: 3/22/24

Adopted this \_\_\_\_\_ day of \_\_\_\_\_, 2024 at Hartford, Connecticut by vote of the Commission.

\_\_\_\_\_  
Commissioner  
By Order of the Commission

ORDER

IT IS HEREBY ORDERED THAT the Respondent, June Logie, shall pay a civil penalty of \$400.00 for failing to follow the reporting guidelines in General Statutes § 9-608 and § 9-611(d) and shall agree to follow those provisions in the future.

The Respondent

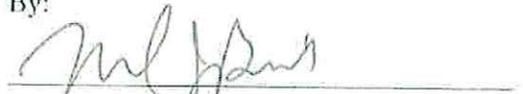
For the State of Connecticut

By:



June Logie  
140 Rock House Road  
Easton, CT 06612

By:



Michael J. Brandi, Esq.  
Executive Director and General Counsel and  
Authorized Representative of the  
State Elections Enforcement Commission  
55 Farmington Avenue, 8<sup>th</sup> Floor  
Hartford, CT 06106

Dated: March 20, 2024

Dated: 3/22/24

Adopted this 22<sup>nd</sup> day of March 2024 at Hartford, Connecticut by vote of the Commission.

  
Commissioner STEPHEN T. PHELAN  
By Order of the Commission