

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of Complaint by Anne Manusky, Easton

File No. 2025-005

FINDINGS AND CONCLUSIONS

This complaint was brought pursuant to General Statutes § 9-7b. The Complainant alleges that the Respondents, members of the Easton Volunteer Emergency Medical Service (“Easton EMS”) failed to include an attribution on mailers, and failed to make financial disclosures, relating to a budget referendum for an EMS building project in town. After an investigation of the complaint, the Commission makes the following findings and conclusions:

Complaint

1. On March 10, 2025, the Commission received the above-captioned complaint and on March 19, 2025, the Commission voted it necessary to investigate the complaint.
2. The complaint is based upon Easton EMS’ distribution of mailers that advocated for a yes-vote on a local referendum regarding building renovations to the current EMS facility.

Relevant Legal Authority

3. This matter is governed by General Statutes § 9-601b(b) which provides that the term “expenditure” does *not* mean:

(13) A lawful communication by any charitable organization which is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code of 1986, or any subsequent corresponding internal revenue code of the United States, as from time to time amended.

Facts Found After an Investigation

4. On February 11, 2025, the town of Easton held a referendum regarding the EMS facilities. Prior to the date of the referendum, Easton EMS sent referendum mailers to residents urging their support. A copy of a mailer provided by the Complainant did not contain an attribution.
5. An investigation revealed that Easton EMS is a properly registered tax-exempt organization under Section 501 (c)(3) of the Internal Revenue Code.

Analysis & Conclusions of Law

6. Because of Easton EMS' 501(c)(3) status, the referendum mailers, a lawful communication,¹ are not considered an expenditure pursuant to General Statutes §9-601b(b)(13).

7. Because the mailers are not an expenditure, Easton EMS is not subject to the provisions of General Statutes §9-621 regarding attributions, nor would they be required to register as a committee or file financial disclosures pursuant to §9-608.

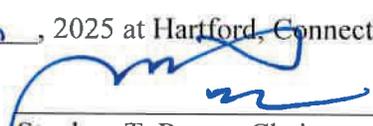
8. The Commission, therefore, dismisses this matter as the allegations were not supported by the facts or the law after investigation.

ORDER

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

That the Commission dismisses this matter.

Adopted this 6th day of August, 2025 at Hartford, Connecticut.



(Stephen T. Penny, Chairman

¹ There is no evidence to suggest that Easton EMS' distribution of their referendum mailers was not a lawful communication. Advocacy related to ballot initiatives and referenda is treated as lobbying under federal tax law, and 501 (c) (3) organizations are permitted to engage in such lobbying so long as it does not constitute a substantial part of their activities. See, 26 U.S.C §501(c)(3); see also, IRS Rev. Rul. 2007-41.