

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint by Scott Hunter, Woodbridge

File No. 2025-010

FINDINGS AND CONCLUSIONS

This complaint was brought pursuant to General Statutes § 9-7b. The complaint alleges that the respondent, a Political Committee, United for Woodbridge (“UFW”), which was formed to address a referendum concerning the sale of public land in the Town of Woodbridge, is operating as an improperly registered durational committee. After an investigation of the complaint, the Commission makes the following findings and conclusions:

1. On or about April 22, 2025, the Commission received the above-captioned complaint and on May 7, 2025, the Commission voted it necessary to investigate the complaint.
2. The Complaint alleges that UFW, a registered durational committee, is operating improperly in that it has failed to comply with various requirements as set forth in General Statutes § 9-605(b), §9-606, §9-608(c)(1)(A), §9-608(c)(1)(B), §9-608(6), §9-621(c), and § 9-623(a).
3. The April 2025 complaint is arranged into seven (7) numbered allegations. On May 7, 2025, the Complainant submitted an additional allegation against UFW to the Commission. The May 2025 submission is addressed herein as an eighth allegation.
4. Two of the allegations in the complaint contend that the UFW has operated beyond the time appropriate for a durational committee and thus may stray into candidate advocacy. See allegation nos. three and five. Two other allegations seek to hold UFW liable for social media posts by another nonprofit entity, Conserve Woodbridge (“CW”). See allegations nos. one and two.
5. The three remaining original allegations find fault with UFW’s filing of its Forms 20 and Form 3. See allegation nos. four, six and seven. Finally, the May 2025 supplement contends that UFW handouts lacked proper attributions and UFW was improperly at a public event. See May 2025 supplemental submission.

FACTS FOUND AFTER INVESTIGATION

6. The Complainant is a private citizen residing in the Town of Woodbridge.
7. United for Woodbridge (“UFW”) registered as a durational political action committee on January 10, 2020.
8. The SEEC Form 3 registration’s listed purpose for forming UFW was to address the Sale of Public Land in the Town of Woodbridge.
9. The SEEC Form 3 registration further indicated that the date of the referendum had not yet been scheduled. Catherine Wick is listed as the Chairperson and Paul Harrigan is designated as Treasurer.
10. At all times relevant, no such referendum has taken place.
11. The Public Land at issue is approximately 155 acres of land that had formerly been the Country Club of Woodbridge (“CCW”). The Town of Woodbridge purchased the land in 2009 and planned to use the land for recreational purposes. For reasons that are not relevant to this investigation, the proposed plan did not proceed.
12. Prior to January 2020, the Town of Woodbridge began reviewing Land Use within the Town, including potential uses for the CCW property. The Town had been approached by developers over the years who wanted to purchase the CCW property. This became a concern of certain individuals within the Town. It was because of this concern that UFW was formed.
13. The investigation disclosed that between January 10, 2020, and the present day the Town reviewed many proposals concerning the future use of Town land. To date, none of those proposals have moved forward.
14. In 2024 the Town engaged Cooper Robertson, a National Planning Firm, to help in shaping a Master plan for the use of the CCW land. The proposed Master Plan was presented to the Town on July 9, 2025. The plan acknowledges that a referendum is necessary for the sale of Public Land. The Master Plan also includes a provision for creating a new Zoning Overlay District that supersedes existing zoning to enable the Master Plan. To date, no referendum has been called.

15. In January 2025, the Town amended its Zoning Regulations to address various provisions that would make it more favorable for Developers who had expressed interest in purchasing portions of the CCW property.

16. UFW provided funds for an application to Reverse the January 2025 Zoning changes. The Application was filed by Woodbridge Resident, Stephan Mason. The application also contained a letter from Mr. Mason sent to the Town Planning & Zoning Commissions. The letter contained a list of Woodbridge Residents supporting the application.

17. Paul Harrigan, the Treasurer of UFW, is a shareholder and President of Wharton Midmarket Investment Advisors, Inc. as disclosed on his investment advisor's registration form. Mr. Harrigan in his response to the complaint states that Wharton Midmarket Investment Advisors, Inc., does not conduct business with the State Treasurer's office or any government entity.

18. Catherine Wick, the Chairperson of UFW, serves as the administrator for the UFW Facebook page. UFW posted content on its Facebook page which included the proper attribution.

19. Catherine Wick also is member of a group known as Conserve Woodbridge ("CW"). CW also maintains a Facebook page, and Ms. Wick serves as the administrator for the CW Facebook page. CW reposted content from the UFW page onto its own Facebook page. The reposting by CW cut off the proper attribution included by UFW.

20. Upon investigation, the Commission determines that with its registration as a Durational committee, UFW has filed all Form 20 filings. Further these Form 20 filings substantially comply with the reporting requirements as set forth in General Statute § 9-606. There were, however, slight ministerial errors in the Forms 20 submitted January 10, 2020, April 10, 2020, April 10, 2022 and October 10, 2023.

21. When the Town of Woodbridge purchased the CCW in 2009, First Selectman Ed Sheehy sent a letter to Woodbridge voters, dated April 30, 2009. In his letter, the First Selectman addressed the CCW purchase. The 2009 Sheehy letter was allegedly subsequently circulated by UFW with a post-it note copied on the letter which stated, "When former first Selectman Sheehy asked for our vote, this is what he promised in return." There was no attribution on the post-it note.

ANALYSIS AND CONCLUSIONS OF THE LAW

DURATIONAL COMMITTEE ALLEGATIONS – ALLEGATION NOS. 3 AND 5

22. General Statute § 9-605 (d) provides that a group of two or more individuals who have joined to promote the success or defeat of a referendum question shall not be required to file as a political committee unless it “receives funds or incurs expenditures exceeding one thousand dollars in the aggregate.”
23. General Statute § 9-605 (b) sets forth the information that is to be provided on the registration statement. Further, § 9-608 (e) provides guidance for the distribution or expenditure from surplus funds when the referendum for which the committee was formed has taken place.
24. The Complaint alleges the following: that the purpose for which the Committee was formed is no longer accurate as more than five (5) years has passed since it was first formed; That the Committee is engaging in activities that far exceed the purpose for which it was formed; That it is no longer proper for the Committee to exist and it should be required to wrap up its operation in accordance with General Statute § 9-608 (e).
25. The review of the filings made by UFW disclose that it has provided the information required and thus there is no factual basis for finding a violation of General Statute § 9-608(e).
26. The Commission stresses it is very unusual for a durational committee to still be in existence after five years. However, the land use issue for which it was formed is still an ongoing issue. The Town of Woodbridge is still engaged in evaluating the disposition of the CCW land. The very plan they have just recently produced indicates that a referendum will be necessary.
27. Furthermore, the activities that UFW has engaged in during the last five years with respect to challenging Zoning and Housing changes and policies can reasonably be seen as contained within the question of the Sale of Public Land. Zoning and Housing Policies effect how the land can be used; this certainly affects the Sale of the Land.

28. The Commission finds, for the reasons detailed herein in, that the question for which the UFW was formed is still an open question and there is a likelihood that a referendum will still take place.

29. The Commission determines that there was no “misrepresentation” in the registration statement and for the narrow and specific reasons detailed herein, the Committee was not required to wrap up as alleged.

30. Based upon the specific unique factual circumstances in this matter, the Commission determines that no violation of General Statute § 9-608(c) occurred and those allegations are dismissed as a matter of fact and law.¹

SOCIAL MEDIA POST ALLEGATIONS – ALLEGATION NOS. 1 AND 2

31. Reporting requirements for registered committees are contained in General Statute § 9-608. Specifically, § 9-608(c)(1)(A) provides that the Statement filed by the Treasurer contain “*an itemized accounting of each contribution, if any, including the full name and complete address of each contributor and the amount of the contribution.*”

32. “Contribution” is defined in General Statute § 9-601a (a) (1) as:
Any gift, subscription, loan, advance, payment or deposit of money or anything of value, made to promote the success or defeat of any candidate seeking the nomination for election, or election or for the purpose of aiding or promoting the success or defeat of any referendum question or the success or defeat of any political party.

33. Pursuant to General Statute § 9-601a (b) (18), as used in Chapter 155, a “contribution” does not mean:

(A) The value associated with the **de minimis** activity on behalf of a party committee, political committee, slate committee or candidate committee,

¹ The complaint also alleges that the actions taken by UFW over the years since it was formed demonstrate that it **may** be drifting into candidate-related advocacy. The Commission declines to so speculate and this assertion fails for lack of evidence.

including for activities including, but not limited to, **(A) the creation of electronic or written communications or digital photos or video as part of an electronic file created on a voluntary basis without compensation, including, but not limited to, the creation and ongoing content development and delivery of social media on the Internet or telephone, including, but not limited to, the sending or receiving of electronic mail or messages;**

34. Upon investigation, the Commission learned that Catherine Wick was the sole administrator of both the Conserve Woodbridge Facebook page and the United for Woodbridge Facebook page. Neither post was ever boosted, no one was paid to create the posts, and there were no costs associated with either post.

35. The statutory presumption of de minimis value as set forth in General Statute § 9-601a (b) (18) has not been overcome. Although coordinated, the mere fact that the Chair of UPW is also responsible for the CW Facebook page does not change the voluntary basis without compensation of the CW reposting, nor the lack of cost for the un-boosted post and repost.²

36. Based on the specific and limited factual circumstances presented herein, the Commission determines that no further action is necessary.

FILING ALLEGATIONS – ALLEGATION NOS. 4, 6 AND 7

37. General Statute § 9-606 sets forth the requirements for information to be reported by the Committee Treasurer in its periodic filings and itemized campaign finance statements.

38. The Commission has reviewed the Form 20 filings made by the Treasurer for UFW and finds there has been substantial compliance with the reporting requirements. The handful of minor omissions noted in the complaint are not material, as follows:

1. On the initial UFW Form 20 dated January 10, 2020,
 - a. provide the source of the initial funds on hand in the amount of \$305.03;
 - b. provide Catherine Wick's principal occupation; and

² The complaint also asserts that when CW reposted, it omitted the attribution. Since CW is not a respondent in this matter, the Commission declines to address this issue.

- c. if applicable, list aggregate contributions from David Lober.
 2. On the UFW April 10, 2020 Form 20,
 - a. If applicable, list aggregate contributions from Warner Pyne.
 3. On the UFW April 10, 2022 Form 20,
 - a. provide the method of the contribution made by Thomas Well;
 - b. If applicable, list aggregate contributions from Warner Pyne; and
 - c. Clarify whether the David Lober contribution is single or the aggregate amount.
 4. On the UFW October 10, 2023 Form 20, advise when the bills for the Woodbridge Town News Ads were received and paid.

39. Given the substantial compliance and the minor nature of the requested corrections, the Commission finds that any errors were inadvertent. Under these specific circumstances, the Commission declines to find a violation.

40. The complaint also alleges that Paul Harrigan made a false statement when he filed SEEC Form 3 in that he certified that he was not a principal of a Financial Services Firm. Because his investment firm does not do business with the State Treasurer, or indeed, any state agency, Mr. Harrigan does not fit the definition of a principal of a Financial Services Firm.

41. The Commission therefore dismisses the alleged violation of General Statute § 9-623 as it fails as a matter of fact and law.

42. In its 2025 Form 20 filing, UFW disclosed an expenditure of \$310 paid to the Town of Woodbridge on February 21, 2025 as miscellaneous rather than as the fee charged by Woodbridge for a zoning application. It is a proper expenditure as addressing Zoning issues falls within the penumbra of the Sale of Public land as it effects the uses for which land can be used and therefore is a permissible expenditure under General Statute § 9-607 (g).

43. The complaint further alleges that the Application filed to the Zoning and Planning Commission by Stephen Mason represents an in-kind contribution to UFW, and that this should be listed on Form 20 with a value placed upon it. As to this allegation the Commission finds no factual basis and no merit.

HANDBILL ALLEGATIONS – ALLEGATION NO. 8

44. The Complainant provided the Commission with additional allegations on May 7, 2025. The May 2025 submission allege violations of General Statutes § 9-621(c) and § 9-623(a).
45. The Complainant alleges that on two occasions UFW’s Chairperson Catherine Wick and a UFW contributor distributed handbills. On April 2, 2025, and April 25, 2025 these handbills were distributed inside the Woodbridge Center Building entrance during a Community Open House and during Woodbridge’s Earth Day respectively.
46. It is alleged that the handbills featured a repurposed campaign letter originally issued on April 30, 2009 and clearly marked as Paid for by Ed Sheehy for First Selectman, Robert M. Berke, Esq., Treasurer.
47. Attached to each of these campaign letters was a handwritten post-it note stating “When former First Selectman Ed Sheehy asked for our VOTES, this is what he PROMISED in return!”
48. The Complaint alleges that the participation of UFW in these community events was improper. That by having a sign which identified its existence posted on a table it should be classified as a sponsor.
49. That UFW had a sign on a table which contained printed material from other organizations including CW, Audubon Connecticut, Southwest Conservation District and The Office of the State Controller (State of Connecticut) and the “Ed Sheehy Letter”.
50. There is no evidence to support the allegations that UFW was a sponsor of the event.
51. There is no evidence to support an allegation that UFW was the distributor of any materials other than the fact that Catherine Wick was present at the events.
52. No credible evidence exists that UFW produced or distributed the documents that form the basis of this allegation.
53. Therefore, the Commission dismissed this allegation as a matter of fact.

ORDER

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

The Commission takes no further action as to allegation nos. one and two.

The matter is dismissed as to allegation nos. three through eight.

Adopted this 19th day of Nov. 2025, at Hartford, Connecticut.



Stephen T. Penny, Chairman
By Order of the Commission