

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of an SEEC Referral for the Failure to File a Statement of Receipts and Expenditures of the Flynn 2022 PAC

SEEC File No. 2024-141
SEEC File No. 2024-146
SEEC File No. 2024-149
SEEC File No. 2024-161
SEEC File No. 2025-012
SEEC File No. 2025-013
SEEC File No. 2025-014
SEEC File No. 2025-031

FINDINGS AND CONCLUSIONS

An internal referral from election officers to the Enforcement Unit originated the above-referred non-filer matters because John J. Flynn has not filed any financial disclosure statement required under campaign finance laws of the State of Connecticut, other than SEEC Form 3, Political Committee (PAC) Registration. After an investigation of the referrals, the Commission makes the following findings and conclusions:

Referral Allegations

1. The SEEC Referral for the Failure to File a Statement of Receipts and Expenditures considers the following periods:
 - January 10th, 2024, Filing Period, SEEC File No. 2024-141
 - April 10th, 2024 Filing Period, SEEC File No. 2024-146
 - July 10th, 2024 Filing Period, SEEC File No. 2024-149
 - 7th Day Preceding General Election Filing (October 29th, 2025 Filing) Period, SEEC File No. 2024-161
 - October 10th, 2024, Filing, SEEC File No. 2025-012
 - July 10th, 2025, Filing Period, SEEC File No. 2025-013
 - April 10th, 2025, Filing Period, SEEC File No. 2025-014
 - January 10th, 2025, Filing Period, SEEC File No. 2025-031
2. Based on the referrals, the Commission named John J. Flynn, the Treasurer and Chairperson of the Flynn 2022 committee, as the Respondent in these matters.

Facts Found After an Investigation

3. Respondent Flynn filed required documents with the Federal Elections Commission (FEC). According to a FEC Form 2, Statement of Candidacy, received by the FEC on June 24, 2019 at 3:49 PM, Respondent Flynn declared for the Senate race in CT and named his committee as “John J. Flynn for US Senate 2022.” In a letter, dated “6/21/19” that most likely accompanied the FEC Form 2, Respondent Flynn stated his email address as clairvoyantcapital@msn.com. According to a FEC Form 3, Report of Receipts and Disbursements, Filing FEC-1587628, which covered “period 01/01/2022 through 03/31/2022,” Respondent Flynn had \$9183.19 in cash on hand at the close of the reporting period
4. According to records contained in eCris, on December 11, 2021, Respondent Flynn filed an SEEC Form 3, Political Committee (PAC) Registration, for “Flynn 2022,” and the address associated was 9 Ledge Road, Rowayton, CT. 06853.
5. An examination of the SEEC Form 3 for Flynn 2022 revealed that the email address listed is johnflynn4ussenate@yahoo.com, and the website was listed as flynn2022ussenate.com. In response to the question concerning whether the committee file reports with federal election commission or any out-of-state elections agency, on the SEEC Form 3, Respondent Flynn stated, “FEC Washington D.C.”
6. On April 8, 2022, according to call records of the Commission, Respondent Flynn called the Commission. Additionally, clairvoyantcapital@msn.com was the email address associated with the call record for April 8, 2022. Furthermore, Respondent Flynn called the Commission because he saw a newspaper article about Peter Lumaj filing paperwork with the state for a federal campaign against Richard Blumenthal. Respondent Flynn was advised by Commission staff that the race involving Senator Blumenthal was a federal race.
7. On April 11, 2022, at 9:03 AM, Commission staff sent a reminder email to file the April quarterly filing by 11:59 PM that night. At 12:24 PM on April 11, 2022, from clairvoyantcapital@msn.com, the Commission received an email response stating, “i [sic] don't have a Pac.” In the email chain associated with the reply from clairvoyantcapital@msn.com, the Commission notes a Commission staff member with prior experience working with Respondent Flynn on Commission related matters identified the email address as belonging to Respondent Flynn.
8. On April 11, 2022, at around 12:30 PM, according to call records of the Commission, Respondent Flynn called the Commission to inquire about a reminder to file an April 10th filing sent by Commission staff. Respondent Flynn wanted to know why he

received this email as he is running for senate and does not have a PAC to file this report.

9. An examination of the flynn2022ussenate.com website revealed that the webpage name was “John Flynn U.S. Senate Candidate for Connecticut,” and stated, “Use the buttons below to submit a donation via credit card. Checks may be made out to ‘Flynn2022’ & mailed to: Flynn 2022 9 Ledge Road Rowayton, CT. [sic] 06853.”
10. According to records contained in eCris, since December 11, 2021, Respondent Flynn has only filed the initial SEEC Form 3 for Flynn 2022 and has not made another filing.

Legal Analysis and Conclusion

11. The Commission finds that Respondent Flynn clearly intended and did campaign for a U.S. Senate seat for the State of Connecticut in 2022 based on the filed FEC Form 2 and other federally required financial disclosure statements with the FEC along with the flynn2022ussenate.com website.
12. Based on the information contained on the SEEC Form 3, Respondent Flynn’s subsequent correspondences with the Commission, Respondent Flynn’s intentional failure to file financial disclosures statements required under state campaign finance laws, and Respondent Flynn’s expressed intentions to run for U.S. Senate seat for the State of Connecticut, the Commission finds that Respondent Flynn did not intend to form a political committee pursuant to General Statutes § 9-605 by filing a SEEC Form 3 for “Flynn 2022;” therefore, the Commission concludes that Respondent Flynn misfiled SEEC Form 3 with the Commission.
13. Because the above-referred referrals in these matters originated from an internal referral of the Commission pursuant to the Commission’s power to initiate an investigation as stated in General Statutes § 9-7b (a), the Commission finds that the SEEC Form 3 for Flynn 2022 is a part of the formal referral statement because it serves as the basis of the referrals.
14. Based on the narrow and specific facts and findings stated above, the Commission concludes that the above-referred referrals are dismissed, any internal forthcoming matters or matters not referred based on a failure of John J. Flynn to file or update a financial disclosure statement required under the campaign finance laws of the State of Connecticut for Flynn 2022 shall not be referred to the Enforcement Unit for further enforcement, and, pursuant to the Regulations of Connecticut State Agencies § 9-7b-42, the misfiled SEEC Form 3 for Flynn 2022 by John J. Flynn is administratively withdrawn.

That the above-referred referrals are dismissed, any internal forthcoming matters or matters not referred based on a failure of John J. Flynn to file or update a financial disclosure statement required under the campaign finance laws of the State of Connecticut for Flynn 2022 shall not be referred to the Enforcement Unit for further enforcement, and the misfiled SEEC Form 3 for Flynn 2022 by John J. Flynn is administratively withdrawn.

Adopted this 18th day of June, 2025 at Hartford, Connecticut.



~~Michael, Commissioner~~
By Order of the Commission
Michael Ayello

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