

# State Elections Enforcement Commission



*The Digest of Administrative Reports to the Governor*

*Fiscal Year 2023-2024*

*Agency: State Elections Enforcement Commission*

**Commission Members:** Stephen Penny (*Chair*), Michael Ajello (*Vice Chair*), Shannon Bergquist, Gregory Piecuch, Sonia Worrell Asare

**Established:** 1974

**Statutory Authority:** Conn. Gen. Statutes Sec. 9-7a, 9-7b

**Central Office:** 55 Farmington Avenue  
Hartford, CT 06105

**Number of Authorized Employees:** 35

**Recurring Operating Expenses:** \$ 3,193,420

**Organizational Structure:** State Elections Enforcement Commission; Executive Director and General Counsel, Michael J. Brandi; Legal Program Director, Shannon C. Kief; Director of Disclosure and Audit, Salman Munir; Director of Information Technology (Vacant). The agency is organized into an Enforcement Unit, a Public Campaign Financing and Compliance Unit, a Fiscal, Administrative and Grant Payment Unit, Campaign Disclosure & Audit Unit, and Information Technology Services.

## **Mission**

*The Commission was established in 1974 as an independent watchdog agency in the executive branch of state government. Its mission is to enforce and ensure compliance with laws pertaining to state and local elections, primaries and referenda. The Commission's goal is to prevent violations from occurring through education and the disclosure of campaign finances and by enforcing election laws in order to maintain the confidence of the people of Connecticut in the electoral process and the officials involved in that process.*

## **Statutory Responsibility**

The Commission's original statutory responsibility was to enforce provisions of state election laws pertaining to elections, primaries and referenda. With the passage of Public Act 05-5, the Commission's responsibilities now include administering the Citizens' Election Program (CEP) and developing and maintaining eCRIS. With the passage of Public Acts 10-187 and 13-180, the Commission began to provide increased transparency for independent expenditures in state elections. The Commission is the campaign finance filing repository for all campaign finance records for candidate committees organized for state elections, party committees, traditional political committees and independent expenditure political committees formed to aid or promote the success or defeat of state candidates, and other persons making independent expenditures in state elections. The Commission is charged with the specific responsibilities of conducting investigations of election complaints, issuing compliance advice concerning requirements of the campaign finance laws, and recommending revisions to the election laws to the Connecticut General Assembly.

## **Public Service**

The Commission is an independent watchdog agency within the executive branch of state government and serves as an impartial arbiter of complaints alleging violations of the election laws. The Commission takes a proactive approach to educate candidates, campaign officials, political parties and citizens of their rights, duties and obligations under the election laws in order to ensure voluntary compliance with the law.

Voter fraud and the security of our voting systems continued to be topics of national discussion. Our agency responded to inquiries from the media, advocacy groups, concerned citizens and other agencies at both the state and national levels, answering numerous requests for information and statistics.

In the past year, the State Elections Enforcement Commission worked closely with both federal and local agencies to secure critical election infrastructure. We worked in coordination with the Department of Homeland Security and the Federal Bureau of Investigation, the Secretary of the State, the Department of Emergency Services and Public Protection, the Attorney General's Office, the Connecticut Division of Emergency Management and Homeland Security, as well as DAS/BEST in an effort to disseminate critical information in a timely manner so as to better respond to cyber threats and malicious activities. Information technology staff members provided continuous monitoring and remediation of information systems associated with the critical election infrastructure as reports of new and more active threats emerged from both nation-states and individual bad actors attempting to disrupt the presidential election.

## **Improvements/Achievements FY 2023-2024**

### **Public Campaign Financing**

Connecticut's landmark public campaign financing program, the CEP, was successfully administered for the 2022 cycle, which extended into 2023, and for the 2024 election cycle, which included one special election. The Program is financed by the Citizens' Election Fund (CEF), a separate, non-lapsing fund within the State's General Fund.

In fiscal year 2023-2024, the Commission issued \$1,591,224.90 in grant monies. This includes \$284,642.36 for primary grants and \$1,257,110.04 in general elections grant for 2024 election year. It also includes \$49,472.50 for two grants in one special election in 2024.

Staff administered the return to the CEF of \$207,127.28 in surplus funds as part of the wrap-up of the 2022 election cycle and the 2022 and 2023 special elections.

In addition, in fiscal year 2023-2024, Audit staff completed one hundred and thirty-seven (137) post-election reviews of randomly selected General Assembly committees that were presented to the Commission for consideration.

During the fiscal year, staff completed its review and analysis of the treasurers and candidates it surveyed who participated in the CEP during the 2022 election cycle. Of those surveyed, 90% of treasurers and 86% of candidates were satisfied with their experience using the Program.

### **Compliance & Training**

SEEC compliance attorneys and election officers work closely with candidates running for municipal, statewide, General Assembly, and judge of probate offices, providing candidates and campaign treasurers with materials and training necessary to understand Connecticut campaign finance laws and CEP requirements.

SEEC published numerous handbooks, guides and other informational materials and provided virtual and in-person trainings for candidates and treasurers, town clerks and registrars of voters. The attorneys and elections officers answered approximately 4,376 compliance questions regarding state and local elections, referenda, and the CEP. We responded to approximately 237 Freedom of Information requests as well.

The agency also managed to provide effective training with our online training options. We offered training modules for using our electronic campaign finance filing system, eCRIS, with these modules being viewed 8,000 times during this fiscal year. We also monitored our online trainings for CEP candidates and treasurers, with these modules being viewed over 9,000 times. Finally, we continued to have municipal compliance training modules available online, which were viewed over 3,000 times.

In an effort to ensure that the elections are administered fairly in every city and town in Connecticut, the SEEC also runs a telephone hotline in conjunction with the Secretary of the State's Office so that anyone with knowledge of election fraud or voting rights abuses can report them. For this fiscal year, SEEC staff handled over 150 calls on primary and election days.

SEEC staff also coordinates the Commission's legislative activities, as well as acts as liaisons with legislators and other executive administrative branch agencies. This fiscal year, SEEC proposed legislation to improve and clarify the clean elections program, make SEEC the filing repository for all municipal filings, update referenda and independent expenditure law, and prohibit foreign spending on elections and referenda. SEEC worked with the legislature on these and other bills, and eventually helped to pass Public Act 24-28, An Act Concerning Foreign Political Spending. The bill helps protect the integrity of Connecticut elections and referenda.

In order to facilitate compliance and the required disclosure pursuant to Public Act 23-205 and Public Act 24-28, our compliance and information technology staff redesigned and implemented new electronic reporting for multiple campaign finance and registration forms. These changes allow the tracking of information regarding the new foreign national bans and aggregated organization expenditures. New reporting regarding aggregated organization expenditures may now be viewed from the SEEC home page.

In addition, the agency works closely with the Attorney General's office to assess challenges to certain provisions of Connecticut campaign finance laws. The agency also works closely with other state law enforcement agencies and federal enforcement agencies, including the Federal Bureau of Investigations and the Department of Justice, where fact patterns overlap with cases on our docket.

### **Campaign Disclosure**

Overall, for fiscal year ending 2024, approximately 1,255 entities had registered with the SEEC. There were 484 candidates (444 candidate committees, 40 candidates with exemptions), 56 exploratory committees, 376 party committees, 339 other political committees—320 of which were traditional political committees, 16 of which were independent expenditure political committees and 3 were referendum political committees.

All together, these filers submitted approximately 5,286 campaign finance disclosure reports and amendments during the fiscal year. All of these were available to the public and searchable through our electronic filing system, eCRIS.

### **Information Technology Systems and Services**

SEEC's responsibilities as the repository for campaign filings, the administrator of the CEP, the year-round answer desk for election law questions, and the agency tasked with enforcing all election laws has required the development of highly specific, customized in-house computer systems. These have been routinely maintained, upgraded and improved by our IT staff. The systems include eCRIS (Electronic Campaign Reporting Information System), Candidate Tracking System (CTS), and SEEC Support (internal call and query tracking system). The IT Unit continued active development projects on all of these in-house systems, which is necessary to maintain the flow of information and online application infrastructure to the eCRIS customer base. IT staff, along with other SEEC staff, also have continued to enhance and refine the LaserFiche document management workflow system to organize our internal case-flow for the Enforcement Unit.

During this fiscal year, the eCRIS Helpdesk had nearly 1,000 contacts (including on holidays and weekends). SEEC information technology staff run the Helpdesk, providing technical support to the regulated community who are required to submit electronic campaign finance filings. The Helpdesk is critical to the successful electronic filing initiative. Through our continued outreach effort by staff, we have been able to continually increase electronic filing via eCRIS. This continues to result in a major savings in data entry costs, staff resources, and expenses for storage of paper documents.

The IT Staff continued with direct staff engagements and solicited customer feedback to enhance and make improvements to the CTS interface, while continuing to provide additional functionality to enhance the audit tracking function of CTS in order to leverage the existing data and make reporting and fact finding more relevant. The Audit Tracking functionality offers streamlined workflow and provides productivity gains in the Audit Review process. IT staff continues to assist staff attorneys in responding to regular, frequent large-volume FOI requests from the public.

### **Investigations and Enforcement**

The Commission docketed 211 new cases in the 2023-2024 fiscal year. One hundred and thirty-six (136) of the new cases were the result of sworn citizens' complaints and referrals from outside election officials. Seventy-five (75) cases were initiated by the Commission on its own motion. These matters involve a multitude of election issues, including matters of election administration, the process of voting, campaign finance and disclosure, including non-filer matters, and the CEP. SEEC collected \$11,004.26 in late filing fees, civil penalties and forfeitures for violations of election laws, which were deposited in the General Fund.

Of the 136 new cases docketed as a result of a sworn citizen's complaint or referral during this fiscal year, the following municipalities had more than one matter:

*Bridgeport, Brookfield, Danbury, East Granby, Enfield, Easton, Fairfield, Greenwich, Hamden, Hartford, Middletown, New Haven, North Grosvenordale, Oxford, Riverside, South Windsor, Wallingford, Wethersfield*

SEEC closed a total of 85 docketed matters during the fiscal year. Of these, thirty (30) were newly docketed cases and 55 were from prior fiscal years. Of the closures, thirty-seven (37) resulted in monetary penalties or other forms of sanctions (civil penalties, forfeitures, permanent or temporary prohibitions in serving specified campaign finance roles, reprimands or orders to comply), thirty-four (34) were dismissed with a finding of no violation or with no further action because either adequate compliance was reached or there was insufficient evidence to make a determination, nine (9) were administratively closed, two (2) were withdrawn, and three (3) determined unnecessary to investigate.