



STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

*WRITTEN TESTIMONY PRESENTED BEFORE THE GOVERNMENT
ADMINISTRATION AND ELECTIONS COMMITTEE
IN OPPOSITION TO H.B. 7000*

March 16, 2015

*Statement of Michael J. Brandi, Executive Director & General Counsel
State Elections Enforcement Commission*

Chairman Cassano and Chairman Jutila, Vice Chairs Gerratana and Steinberg, Ranking Members McLachlan and Smith, and distinguished Committee members. I am Michael Brandi, the Executive Director and General Counsel of the State Elections Enforcement Commission (SEEC.)

I am writing to the committee to express the Commission's opposition to House Bill 7000 because it unnecessarily infringes upon the independence of our agency and creates uncertainty in our regulated community. By inserting the Attorney General's office into the rule making processes of the SEEC, this bill would usurp the Commission's ability to interpret the laws under its purview.

Specifically, the bill would allow any business in the state that has a "bona fide dispute" with the SEEC concerning the application of a regulation to ask for and receive an opinion from the Attorney General's office. The term "regulation," as set forth in CGS § 4-166 (13), is wide-ranging and encompasses, with just a few exceptions, "each agency statement of general applicability, without regard to its designation, that implements, interprets, or prescribes law or policy . . ." The term "bona fide dispute" is ambiguous, and could cover anything from an official complaint to a difference of opinion.

Overall, this measure would create confusion for our regulated community and weaken our agency's ability to give advice on the laws we are tasked with administering. Additionally, it could put the Commission into conflict with the Attorney General's office, which is tasked with representing the SEEC, and it would definitely harm our independence and ability to carry out our mandate.

Thank you for the opportunity to present this testimony.

A handwritten signature in black ink, appearing to read "Michael J. Brandi". The signature is fluid and cursive, with the first name being the most prominent.

Michael J. Brandi

Executive Director and General Counsel

State Elections Enforcement Commission