

---

## OLR Bill Analysis

### sSB 252

#### ***AN ACT CONCERNING REFERENDA, INDEPENDENT EXPENDITURES AND OTHER CAMPAIGN FINANCE CHANGES.***

#### **SUMMARY**

This bill changes laws affecting campaign finance and elections. Principally, it does the following:

1. codifies “independent expenditure political committee” (known as an IE-only PAC) as a type of political committee (PAC) and requires IE-only PACs to register with the State Elections Enforcement Commission (SEEC) (§§ 1-3, 6, 7 & 9-15);
2. classifies referendum PACs as IE-only PACs and makes conforming changes (§ 15);
3. expands independent expenditure (IE) disclosure requirements while increasing the expenditure threshold that triggers the requirements (§ 4);
4. increases the maximum penalties for failing to file IE reports (§ 4);
5. modifies PAC registration requirements, including expanding the contents of the registration statement (§ 5);
6. in conformity with current practice, eliminates aggregate individual contribution limits to certain committees (§ 8);
7. expands disclaimer requirements for referenda and party candidate listings (§§ 16-19);
8. narrows the circumstances under which SEEC must dismiss a complaint within one year after receiving it (§ 20);

9. decreases, from \$1,000 to \$250, the limit on contributions by an individual to a candidate for state senator in a primary or general election (§ 21);
10. restores Citizens' Election Program (CEP) qualifying contribution limits and aggregate amounts to their base levels (§ 22); and
11. increases campaign consultants' disclosure requirements (§§ 23-25).

The bill also makes minor, technical, and conforming changes.

EFFECTIVE DATE: Upon passage

**§§ 1-3, 6, 7 & 9-15 — IE-ONLY PACS**

The law authorizes persons (including individuals, entities, and committees) to make unlimited IEs and defines "independent expenditure" as an expenditure made without the consent, coordination, or consultation of a (1) candidate or candidate's agent, (2) candidate committee, (3) PAC, or (4) party committee (CGS § 9-601c).

The bill codifies "independent expenditure political committee" (known as an IE-only PAC) as a type of PAC under Connecticut's campaign finance laws and, like other committees that make IEs, requires their registration with SEEC. It defines them as PACs that make only (1) IEs and (2) contributions to other IE-only PACs (see BACKGROUND). It also allows these PACs to (1) coordinate with other IE-only PACs to make IEs and (2) make donations to tax-exempt 501(c)(3) (nonprofit) and 501(c)(19) (veterans) organizations and refund contributor contributions.

The bill makes several conforming changes, including specifying that (1) individuals, business entities, and labor unions may make contributions to IE-only PACs and (2) various types of IE-only PACs, such as those formed for a single election or primary, may not make contributions except to other IE-only PACs. It also classifies referendum PACs as IE-only PACs.

***Lawful Purposes (§ 6)***

The bill defines “lawful purposes of the committee” for IE-only PACs as promoting the following:

1. a political party,
2. the success or defeat of candidates for nomination or election to a public office or position regulated by state campaign finance laws, or
3. the success or defeat of referendum questions.

Existing law generally allows PACs to pay specific expenses to accomplish their lawful purposes.

***Surplus Distributions (§ 7)***

By law, candidate committees and PACs, other than exploratory committees or PACs organized for ongoing political activities, must generally spend or distribute surplus funds (1) within 90 days after (a) a primary when a candidate loses or (b) an election or referendum not held in November or (2) by March 31 following an election or a referendum held in November.

The bill establishes a surplus distribution procedure for IE-only PACs, other than those formed for ongoing activities. Specifically, it requires them to distribute surplus funds, according to the schedule outlined above, to (1) their contributors, on a prorated basis; (2) state or municipal governments or agencies; or (3) tax-exempt 501(c)(3) and 501(c)(19) organizations.

***Referendum PACs (§§ 7 & 15)***

The bill classifies referendum PACs as IE-only PACs and makes conforming changes. Specifically, it allows any person to establish an IE-only PAC for a single referendum question or multiple questions submitted to a vote on the same day. Under the bill, the committee may make IEs only for these purposes.

Relatedly, the bill eliminates provisions in current law that establish

surplus distributions for referendum PACs and instead subjects them to the bill's procedure for IE-only PACs.

#### **§ 4 — REPORTING IES AND COVERED TRANSFERS**

Under current law, persons must disclose information about IEs they make that exceed \$1,000 in the aggregate by filing certain reports. A “person” is an individual, committee, firm, partnership, organization, association, syndicate, company trust, corporation, limited liability company, or any other legal entity (other than the state or its political or administrative subdivisions) (CGS § 9-601(10)).

The bill does the following:

1. increases, from \$1,000 to \$5,000, the aggregate expenditure threshold that triggers the filing requirements;
2. changes the period during which IE disclosure reports are subject to a 24-hour electronic filing deadline;
3. expands disclosure requirements for persons that make IEs without forming a PAC (known as “incidental spenders”);
4. increases the maximum penalties for failing to file IE reports; and
5. conforms law to practice by requiring that, to disclose IEs, (a) incidental spenders use SEEC's long- and short-form reports and (b) PACs, including IE-only PACs, use SEEC's campaign finance forms for PACs formed in Connecticut.

As under existing law, IEs made for or against (1) statewide office or legislative candidates, or statewide referenda, must be filed with SEEC and (2) municipal office candidates or municipal referenda must be filed with town clerks.

#### ***24-Hour Report Filing Deadline***

Under current law, a person must electronically file a disclosure report within 24 hours after making or obligating to make an IE during a primary or general election campaign that exceeds \$1,000 in the aggregate and promotes the success or defeat of a statewide office or

legislative candidate.

The bill increases the aggregate expenditure threshold to \$5,000 and instead applies the 24-hour electronic filing requirement to these IEs made or obligated to be made during the period (1) beginning June 1 in a regular election year or, in the case of a special election for state senator or state representative, the day the governor issues writs of election, and (2) ending on the day after the primary or general election for which the IE is made or incurred. In the case of a special election, a person that makes or obligates to make an IE that exceeds \$5,000 in the aggregate before the governor issues the writs must electronically file the IE report within 24 hours after the governor issues the writs.

Additionally, the bill applies the 24-hour reporting requirement to IEs within this timeframe that promote the success or defeat of a referendum question proposing a constitutional amendment, convention, or revision.

For any other IEs (those not subject to 24-hour reporting requirements), the bill requires that IE reports be filed according to the same schedule as the periodic statements filed by PACs.

### ***Disclosures by Incidental Spenders***

Existing law requires persons, other than PACs (as described above), to disclose information about IEs they make using SEEC's long- and short-form reports (i.e., SEEC Form 26) (see BACKGROUND). The bill adds to the information that these IE-makers must disclose in these reports.

Under the bill, they must additionally disclose the following in the long-form report:

1. the name of the human being who had direct, extensive, and substantive decision-making authority over the IE being disclosed, as well as his or her mailing address, telephone number, and e-mail;
2. for the person making or obligating to make the IE, a statement

indicating if the person files a report with the Federal Election Commission (FEC), IRS, or any similar out-of-state agency, and identifying information under which the filing is made;

3. generally, any street address that differs from any mailing address required by the form; and
4. for a referendum, its date, the question's text, and whether the IE supported or opposed it.

Under the bill, the short-form report must also disclose, for a referendum, the question's text and an allocation of the expenditure in support or opposition to it.

***Disclosing Covered Transfers.*** As part of both the long- and short-form reports, the law requires a person to disclose the source and amount of any covered transfer of \$5,000 or more, in the aggregate, received during the 12 months before the applicable primary or election if the IE (for which the report is being filed) is made or obligated to be made 180 days or less before the primary or election. The bill extends the requirement to covered transfers made to promote or oppose a referendum question proposing a constitutional amendment, convention, or revision.

The law exempts from this disclosure requirement a person that discloses the source and amount of a covered transfer in a report it files with the FEC or the IRS, as long as the person includes a copy of the report in the statement it files with SEEC. The bill extends the exemption to persons that include in their IE reports information sufficient for SEEC to find their FEC or IRS filing. The bill also extends this exemption to apply to similar out-of-state agency reports.

Under current law if a person makes the IE from a dedicated IE account, the IE report and disclaimer (see below) may include only persons that made covered transfers to it directly. The bill requires that the report and disclaimer include this information but removes a provision limiting it to only this information.

By law, a “covered transfer” is, with certain exceptions, any donation, transfer, or payment of funds by a person to a recipient that (1) makes IEs or (2) transfers funds to another person that makes IEs (CGS § 9-601(29)).

***Penalties for Failure to File an IE Report***

The bill increases the maximum civil penalties SEEC may impose for failure to file certain required IE reports. It also subjects IEs that support or oppose referendum questions to these penalties.

Specifically, existing law allows SEEC to impose a maximum penalty of \$10,000 for failing to file a report for an IE that is made or obligated more than 90 days before a primary or general election. The bill extends this penalty and the penalties described below to IEs that support or oppose a referendum.

For IEs made or obligated 90 days or fewer before a primary or general election, SEEC may currently impose a maximum penalty of \$20,000 for failing to file a report. The bill instead allows SEEC to impose a penalty of up to \$20,000 or twice the amount of any unreported IE, including for a referendum, whichever is greater.

Currently, a knowing and willful failure to file an IE report is punishable by an additional fine of up to \$50,000. The bill instead allows SEEC to impose an additional civil penalty of up to \$50,000 or 10 times the amount of any unreported expenditure, whichever is greater.

In addition, the bill establishes personal liability for a civil penalty that remains unpaid after the later of one year after the date when (1) SEEC imposed it or (2) a final judgment is issued by a court following any appeal of SEEC’s action. Specifically, the bill makes the following individuals personally liable:

1. in the case of a committee, the chairperson and any officer, or
2. in the case of a person other than a committee, (a) the CEO, CFO, or equivalent; (b) any other officer; and (c) any manager who had direct, extensive, and substantive decision-making authority

over the IE or IEs made or obligated to be made.

## **§ 5 — PAC REGISTRATIONS**

By law, most PACs must register with SEEC and designate a treasurer. They may also designate a deputy treasurer. The registration statement must include, among other things, the committee's name and purpose.

The bill expands the required contents of the PAC registration statement. Under current law, for a committee that files reports with the FEC or an out-of-state agency, the registration must include a statement to that effect and the agency's name. The bill expands this provision to include reports filed with the IRS and also requires that the statement include identifying information under which those filings are made.

In addition, if a committee is established or controlled by a person or individual acting as an agent for a person, the statement must indicate the person's name. If a committee is established or controlled by a person other than a human being, the statement must indicate the name of the CEO or an equivalent. Current law requires only that a PAC established by a business entity or organization (i.e., a labor union) indicate the name of the entity or organization.

## **§ 8 — AGGREGATE CONTRIBUTION LIMIT FOR INDIVIDUALS**

State law generally limits the amount that individuals may contribute to a specific candidate committee, party committee, or PAC. The bill conforms the law to SEEC practice by eliminating an aggregate limit on certain contributions by an individual. Under this limit, an individual may not contribute more than \$30,000 in the aggregate during a single primary and election to (1) candidate committees, (2) exploratory committees, and (3) slate committees for justice of the peace (in a primary). In practice, SEEC does not enforce this aggregate limit (see BACKGROUND).

## **§§ 16-19 — POLITICAL ATTRIBUTIONS**

### ***IEs and Referenda (§§ 16, 17 & 19)***

By law, printed, video, and audio political communications (both IEs



and non-IEs) must include certain attributions, known as “disclaimers.” Among other things, they must identify the person making the expenditure for the communication.

Under current law, only the disclaimer requirements for printed communications apply to expenditures made for a referendum. The bill extends, to IEs promoting a referendum question’s success or defeat, existing law’s disclaimer requirements for election- and primary-related IEs made for video and audio communications and telephone calls. Generally, each of these disclaimers must (1) include the name of the IE-maker and a statement that the expenditure was made independent of any candidate or political party and (2) state that additional information about the IE-maker is available on SEEC’s website.

Additionally, communications made within 90 days before the primary or election also state the names of the five persons that made the five largest covered transfers to the IE-maker, in the aggregate, during the 12 months immediately before the referendum. As under existing law for other communications, the bill allows disclaimers for referendum IEs to omit any person that made covered transfers to it of less than \$5,000, in the aggregate, during the 12 months immediately before the referendum.

The bill also specifies that, with respect to elections and primaries, existing law’s disclaimer requirements apply only to those IEs promoting a candidate’s success or defeat for nomination or election.

### ***Party Candidate Listings (§ 18)***

Current law requires that party committees (i.e., town and state central) use the appropriate disclaimer in any print, television, or social media promotion of a slate of candidates (disclaimers by individual candidates are not required). The bill instead requires that organization expenditures for party candidate listings by a party committee, legislative caucus committee, or legislative leadership committee use the appropriate disclaimer.

By law, a “party candidate listing” is a communication that (1) lists

the name or names of candidates for election; (2) is distributed through public advertising (e.g., cable television, newspapers, or similar media), direct mail, telephone, electronic mail, publicly accessible Internet sites, or personal delivery; and (3) is made to promote the success or defeat of a candidate or slate of candidates seeking nomination or election, or to aid or promote the success or defeat of a referendum question or a political party. The communication may not be a solicitation for or on behalf of a candidate committee (CGS § 9-601(25)(A)).

## **§ 20 — SEEC INVESTIGATIONS**

By law, SEEC receives complaints from the secretary of the state, registrars of voters, town clerks, and individuals under oath about alleged election law violations. It investigates and holds hearings as it deems appropriate (CGS § 9-7b(a)(1)). The bill narrows the circumstances under which SEEC must dismiss a complaint within one year after receiving it.

### ***Time Limit***

Currently, SEEC must dismiss a complaint it receives on or after January 1, 2018, if it does not issue a final decision on it within one year after receiving the complaint. However, the deadline must be extended if specified actions delay the final decision's issuance.

The bill relaxes this requirement for SEEC complaints received on or after July 1, 2024. It instead requires the commission to dismiss after one year any complaint for which it has not (1) found reason to believe a state election law violation occurred and (2) initiated a contested case proceeding.

The bill also (1) requires that the deadline for making this finding be extended for the same reasons that the final decision deadline must be extended under current law and (2) establishes an additional reason for extending this deadline (see below). As under current law, the one-year deadline must be extended by the length of the delay.

### ***Extensions***

Under current law, the one-year deadline for SEEC to issue a final

decision must be extended if its issuance is delayed for any of the following reasons:

1. extension or continuance granted to a respondent by SEEC or its staff before issuing the decision;
2. issuance of a subpoena in connection with the complaint;
3. litigation in state or federal court related to the complaint; or
4. consultation with the chief state's attorney, attorney general, U.S. Department of Justice, or U.S. attorney for Connecticut.

The bill similarly requires an extension, for these same reasons, of the one-year deadline for finding reason to believe that an election law violation occurred and initiating a contested case. (SEEC regulations generally prohibit the commission from proceeding with a contested case unless it finds, by a majority vote of a quorum, reason to believe that a violation occurred (Conn. Agencies Regs., § 9-7b-35).)

The bill also requires an extension if the finding and commencement are delayed because of an investigation by SEEC or its staff involving a potential IE violation (e.g., making or reporting them).

## **§ 21 — CONTRIBUTION LIMITS**

The bill decreases, from \$1,000 to \$250, the aggregate limit on contributions by an individual to a candidate for state senator. As under existing law, the limit applies separately to a primary and a general election.

## **§ 22 — CEP QUALIFYING CONTRIBUTION AMOUNTS**

By law, the CEP is the state's voluntary public campaign financing system and is available to statewide and legislative office candidates. Candidates qualify for the CEP by raising an aggregate amount of qualifying contributions (QCs), which must come from individual donors.

The bill eliminates the requirement that SEEC adjust for inflation both the maximum QC amount an individual may contribute as well as the

aggregate QC amounts candidates must raise, thus restoring them to their base amounts. Under current law, SEEC must adjust these amounts before each regular election for statewide or legislative office.

By law, the base individual QC limit is \$250 for each statewide or legislative office. In the 2022 state election, the inflation-adjusted limit was \$290. The table below lists the base aggregate amount for each office and the 2022 inflation-adjusted amount.

**Table: Aggregate QC Amounts**

<i>Office</i>	<i>Base Amount</i>	<i>2022 Inflation-Adjusted Amount</i>
Governor	\$250,000	\$288,800
Lieutenant governor, secretary of the state, state treasurer, state comptroller, and attorney general	75,000	86,600
State senator	15,000	17,300*
State representative	5,000	5,800*

\*Under current law, these amounts also apply to the 2024 election

For the 2024 election, SEEC published an inflation-adjusted individual QC limit of \$320 for legislative candidates. It is unclear whether contributions raised before the bill's passage that exceed \$250 would still be deemed to be QCs.

## **§§ 23-25 — CAMPAIGN CONSULTANTS**

By law, treasurers of party committees, candidate committees, and PACs may pay consultants or other professional persons for campaign or committee services. The bill defines “consultant” and “subvendor” for campaign finance purposes and establishes registration, reporting, and record-keeping requirements for them.

Principally, the bill does the following:

1. requires consultants to provide detailed accountings of their expenditures, including to subvendors, to committees or persons on whose behalf they make payments;
2. requires committees and persons that make or obligate to make payments for expenditures to consultants to submit additional

information in their campaign finance disclosure statements or IE reports, as applicable;

3. requires consultants to maintain, for at least four years, detailed records of certain expenditure transactions;
4. prohibits a financial obligation from being made or incurred on behalf of a committee unless authorized by the treasurer;
5. requires consultants and other professionals that work with candidates participating in the CEP to register with SEEC under certain conditions; and
6. establishes two additional illegal campaign finance practices.

The bill also makes technical changes.

***Definitions (§§ 1 & 24)***

The bill defines “consultant” as a person (1) that provides campaign strategy; design or management of campaign communications, literature, or advertising; or fundraising or management services, or (2) with duties that include identifying, hiring, or paying subvendors for goods or services on behalf of a committee or person required to file a campaign finance disclosure statement or IE report (hereafter “required filer”).

“Subvendor” means a person that (1) provides goods or services to a consultant or (2) contracts with a consultant or other subvendor to provide goods or services to a required filer. It does not include a consultant’s employee who has been employed by the consultant for at least three consecutive months prior to any month when a person or committee must file a report that accounts for an expenditure to the consultant or one of his or her subvendors.

Under the bill, a subvendor is deemed a consultant if it makes the types of payments described below, including payments to other subvendors. At that point, it must comply with the bill’s reporting and record-keeping requirements.

**Reporting (§ 24)**

**Consultants.** The bill establishes reporting requirements for consultants that (1) receive or agree to receive payment from a candidate or committee and (2) make or obligate to make expenditures, including payments to subvendors, for or on behalf of a required filer. Under existing law and the bill, consultants may work on behalf of party committees, candidate committees, and PACs.

Specifically, no later than five days after making or obligating to make an expenditure to a subvendor, the consultant must provide the person or committee with detailed accounting of the expenditure. If a consultant makes or obligates to make a payment for an expenditure that requires a committee or person to file a campaign finance disclosure statement or IE report, the consultant must, at the same time, provide that person or committee with all the information necessary to file the statement or report.

The detailed account must include the following information:

1. the expenditure's amount and date;
2. the name of the payment's recipient;
3. the subvendor's full name and street address;
4. a description of the payment's purpose;
5. the name of any candidate, or text of any referendum question, the expenditure supports or opposes; and
6. the date of any event associated with the payment, if applicable.

The bill specifies that expenditures triggering this reporting requirement include those made, directly or indirectly, to a subvendor for:

1. a written, typed, or other printed communication, or any web-based written communication, that (a) promotes the success or defeat of a candidate's campaign for nomination or election, or

- any referendum question, or (b) solicits funds to benefit any candidate or committee;
2. advertising time or space, including television or Internet video, radio or Internet audio, telephone calls, or web-based or social media communication;
  3. wages incurred as a result of work for any candidate or committee;
  4. survey, poll, signature gathering, or door-to-door voter solicitation;
  5. facilities, invitations, or entertainment for fundraising or other campaign events; or
  6. printing of, or postage for, mass campaign mailings.

The bill prohibits a consultant from making an expenditure without providing all of the required information to the applicable committee or person. The prohibition does not apply to overhead or normal operating expenses.

***Persons and Committees That Pay Consultants.*** Under the bill, if a committee or person makes or obligates payments for an expenditure to a consultant that is subject to the above reporting requirements, the committee or person must submit additional information in the campaign finance disclosure statements or IE reports it files with SEEC or a town clerk, as applicable. Specifically, these statements and IE reports must include all of the information that the bill requires the consultant to provide to the committee or person (see above). The committee or person must also include any other information SEEC requires to facilitate compliance with state campaign finance laws.

***Maintaining Records (§ 24)***

The bill requires consultants, including subvendors deemed consultants under the bill, to keep detailed accounts of each expenditure made or obligated for or on behalf of a required filer. They must also

keep, for at least four years, records of each transaction required to be included in such a report.

These records must include any invoice, receipt, bill, statement, itinerary, or other written or documentary evidence demonstrating the expenditure's campaign or other lawful purpose. The bill requires that these records be made available to SEEC upon request.

#### ***Approving Financial Obligations (§ 24)***

Generally, under existing law, a committee cannot incur a financial obligation unless authorized by its treasurer (CGS § 9-607). The bill additionally prohibits a financial obligation from being made or incurred for or on behalf of a committee unless authorized by the treasurer. So, under the bill, it appears that treasurers must approve financial obligations incurred by consultants or subvendors on behalf of the committee.

#### ***Consultants and CEP Candidate Committees (§ 25)***

Under the bill, if a participating CEP candidate's treasurer spends or obligates to spend 15% or more, in the aggregate, of the candidate committee's Citizens' Election Fund grants on a consultant's or other professional's campaign or committee services, that person must register with SEEC by filing an affidavit. The affidavit must certify in writing the consultant's or professional's intent to (1) abide by state campaign finance and CEP laws; (2) maintain and provide all records required by these laws and SEEC regulations; and (3) spend funds in accordance with state law and SEEC regulations on permissible expenditures. Generally, by law, a participating candidate's committee must limit its spending to (1) prescribed amounts of QCs and candidate's personal funds and (2) grants received under the program.

Under the bill, the registration applies to the candidate committee with which the consultant or professional works. SEEC must prepare and make publicly available a list of each registered consultant or other professional for each participating CEP candidate.

#### ***Illegal Campaign Practices (§ 23)***



By law, an illegal campaign finance practice is subject to a civil penalty of up to \$2,000 per offense or twice the amount of any improper payment or contribution, whichever is greater (CGS § 9-7b(a)(2)(D)). If the act is knowing and willful, it is a class D felony, punishable by up to five years in prison, a fine of up to \$5,000, or both (CGS § 9-623(a)).

The bill adds the following as illegal campaign practices:

1. a consultant that fails to provide complete information to a committee or person so that it may file any required campaign finance disclosure statement or IE report; or
2. a consultant that, except for overhead or normal operating expenses, makes or obligates to make an expenditure, or directly or indirectly authorizes a subvendor to make or obligate to make an expenditure, on behalf of a candidate, PAC, or other person without their knowledge.

## **BACKGROUND**

### ***Related Bills***

sHB 5452 (§ 4), reported favorably by the Government Administration and Elections (GAE) Committee, exempts from the law's political advertising disclaimer requirements certain non-fundraising text or media messages.

sHB 5452 (§§ 7-9), reported favorably by the GAE Committee, moves up, from January 15 to January 1 in the year of a state election, the date by which SEEC must make CEP-related inflationary adjustments for that election cycle.

sHB 5498 (§ 30), reported favorably by the GAE Committee, requires that complaints filed with SEEC be referred to the chief state's attorney if the commission determines that probable cause exists but does not issue a decision within 90 days after that violation.

sSB 253 (File 208), reported favorably by the GAE Committee, exempts complaints regarding foreign nationals that are filed with SEEC from the statutory one-year deadline for the commission to adjudicate complaints.

sSB 392 (§ 5), reported favorably by the GAE Committee, requires SEEC to issue a decision on or dismiss a complaint before the day of an election if the complaint relates to that election and is received within 90 days before it.

### **Aggregate Contribution Limits**

In *McCutcheon et al. v. Federal Election Commission*, 134 S. Ct. 1434 (2014), the U.S. Supreme Court held that aggregate limits on contributions by individuals to federal candidates, political parties, and PACs were unconstitutional under the First Amendment.

In Advisory Opinion 2014-03, SEEC announced that, unless it received further guidance from the legislature or a court of competent jurisdiction, it would no longer enforce current law's \$30,000 aggregate limit on contributions by individuals during a single primary and election to (1) candidate committees, (2) exploratory committees, and (3) slate committees for justice of the peace (in a primary).

### **IE-Only PACs**

In Declaratory Ruling 2013-02, SEEC ruled that, in light of a line of cases ruling that contribution limits to IE-Only PACs are unconstitutional, it would no longer enforce contribution limits to PACs that receive and spend funds only for IEs unless it received further guidance from the legislature or a court.

### **Long- and Short-Form IE Reports**

As part of these reports, a person must disclose the source and amount of any covered transfer of \$5,000 or more in the aggregate that it received during the 12 months before the applicable primary or election. This requirement applies if the IE (for which the report is being filed) is made or obligated to be made 180 days or less before the primary or election (CGS § 9-601d(f)).

## **COMMITTEE ACTION**

Government Administration and Elections Committee

Joint Favorable Substitute

Yea 19    Nay 0    (03/26/2024)