



III. Responsibilities of the Committee Chairperson

A. Designation and Registration of a Traditional Political Committee

1. When and What to File

The chairperson must register a political committee within **ten days** of the committee's organization unless it organizes within ten days of an election, primary or referendum for which it intends to solicit contributions or make expenditures, in which case the chairperson must **immediately** file the registration with the appropriate filing repository. Registration of a traditional political committee is accomplished by submitted a registration statement, [SEEC Form 3](#), "Political Committee Registration."

In addition to the registration statement, all political committees are required to file a campaign finance disclosure statement itemizing their initial contribution or disbursement. If the initial contribution or disbursement made to the committee precedes the filing of the registration statement, then the committee's treasurer must file the initial statement itemizing this transaction ([SEEC Form 20](#), "Itemized Campaign Finance Disclosure Statement") along with the registration statement. If the initial contribution or disbursement is received after the filing of the registration statement, the treasurer must file an itemized report ([SEEC Form 20](#)) within **48 hours** of receiving the initial contribution or disbursement.

[General Statutes §§ 9-602(a), 9-605(a) and (b)]

2. Where to File

The **State Elections Enforcement Commission** is the proper filing repository with respect to the following political committees:

- All traditional political committees formed to promote the success or defeat of candidates for one or more of the following offices: Governor, Lieutenant Governor, Secretary of the State, Treasurer, Comptroller, Attorney General, judge of probate, state senator, and/or state representative.
- All traditional political committees formed to promote the success or defeat of one or more of the aforementioned candidates and also wish to spend on proposed constitutional amendments or referenda.

The **town clerk** is the proper filing repository with respect to the following political committees:

- Traditional political committees formed **solely** to promote the success or defeat of candidates for town, city, or borough office.
- Traditional political committees formed **solely** to promote one or more of the aforementioned candidates and also wish to spend on local referenda.



Important Note: If your committee is formed to promote the success or defeat of municipal candidates **and** statewide office and General Assembly candidates, you should register with the State Elections Enforcement Commission only.

Political committees set up to spend on **constitutional amendments or local referenda** and not candidates would file on the [SEEC Form 8](#) and will be the subject of a different guidebook. If a committee wishes to make contributions to candidates and spend on referenda / constitutional amendments, it would do so by forming a traditional political committee.

[General Statutes § 9-603(a) and (b)]

3. Amendments to Registration

Any **additions or revisions** to the information contained in a registration statement must be made by submitting an amended registration statement ([SEEC Form 3](#)) to the appropriate filing repository not later than **ten days** after the addition or change. Unless the amendment involves a change in officer, the treasurer may sign and submit the amendment without the chairperson's signature.

[General Statutes § 9-605(c)]

B. Designation of a Depository Institution

The committee's registration statement ([SEEC Form 3](#)) must contain the name and address of a single depository institution located in Connecticut. The committee must deposit all committee funds into a single checking account established within the designated depository and the treasurer may only make expenditures from this one account.

[General Statutes §§ 9-602(a), 9-605(b), 9-607(e); [Advisory Opinion 1975-6](#)]

Important Note: In order to create a bank account, many financial institutions require the committee to obtain a Federal Employer Identification Number (FEIN). The committee treasurer should contact the Internal Revenue Service (IRS) regarding an FEIN and the necessity to make filings regarding the committee's taxable income. Any questions about these IRS filing requirements should be directed to the IRS's Tax Exempt and Government Entities Customer Account Services toll free telephone number, 1-877-829-5500. Additionally, information is available at the IRS website: www.irs.gov. Commission staff cannot provide information or advice about these rules or requirements.

C. Designation of a Treasurer and Deputy Treasurer

1. Appointment of a Treasurer and Deputy Treasurer

The committee chairperson must appoint one individual, who is a Connecticut elector (registered voter in Connecticut), as treasurer. The committee chairperson may appoint another such individual as deputy treasurer, who must also be a Connecticut elector. It is recommended that each committee have a deputy treasurer who can



deposit funds and make or authorize expenditures and other committee payments if the treasurer is unavailable.

The committee treasurer and deputy treasurer (if applicable) must co-sign the registration statement ([SEEC Form 3](#)) filed by the chairperson, signifying their acceptance of the appointment. Once appointed, the treasurer and deputy treasurer (if applicable) serve indefinitely. The treasurer (or deputy treasurer if the treasurer is unavailable) is solely responsible for receiving, depositing, and expending funds, for filing financial disclosure statements with the proper filing repository, and for keeping internal records of all transactions, as more fully discussed in [Chapter IV. The Role of the Treasurer](#).

[General Statutes §§ 9-602(a) and (c), 9-605(a), 9-606(d), 9-607(a) and (d)]

2. Resignation and Replacement of a Treasurer

During the life of the political committee, its treasurer may resign, be replaced, or otherwise become incapacitated. If a treasurer wishes to resign, he must submit a written statement of resignation with the appropriate filing repository in order to be relieved from his or her statutory obligations and liability under the campaign finance laws. If the filing repository is the Commission, the treasurer may either send the resignation letter in the mail or by email to seec@ct.gov. If a chairperson submits an amended registration statement appointing a new treasurer, signed by both the chairperson and the new treasurer, the prior treasurer is also relieved of his duties even if he has not submitted a statement of resignation.

Upon a treasurer's resignation or permanent incapacity, the deputy treasurer, if any, automatically succeeds as "acting" treasurer until a new treasurer is appointed. Where no deputy treasurer has been appointed, the failure to designate a successor treasurer within **ten days** of the resignation or incapacity is a violation of General Statutes [§ 9-602\(c\)](#), for which a fine may be imposed against the committee chairperson. Regardless of whether a deputy treasurer has been appointed, it is strongly recommended that the committee chairperson formally designate a successor treasurer by filing an amended registration statement ([SEEC Form 3](#)) with the appropriate filing repository within the ten days.

A political committee may **not** receive any contributions, or make or incur any expenditures during a period in which the committee lacks a treasurer or deputy treasurer. The committee chairperson is legally liable for any such violation and subject to a maximum civil penalty of \$2,000 per violation.

[General Statutes §§ 9-7b, 9-602(a) and (c), 9-607(a) and (d)]

3. Who May Not Be a Treasurer or Deputy Treasurer

An individual who is not a Connecticut elector may not serve as treasurer or deputy treasurer.

In addition, an individual may not serve as treasurer or deputy treasurer of more than one political committee (except an individual may be treasurer or deputy treasurer for a legislative leadership or legislative caucus committee and another political committee). Serving as a treasurer or deputy treasurer qualifies as controlling a political



committee and Connecticut's campaign finance laws mandate that no individual may establish or control more than one political committee, as is more fully detailed in Section F of this chapter.

Practically speaking, communicator lobbyists, their immediate families, and their agents may not serve as treasurers for political committees established or controlled by candidates for Governor, Lieutenant Governor, Secretary of the State, Treasurer, State Comptroller, Attorney General, state senator or state representative or for legislative leadership or legislative caucus committees as they are prohibited from bundling contributions for such committees. For more information on who is considered a communicator lobbyist, please see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#).

A person who has not paid civil penalties or forfeitures assessed against him under the campaign finance statutes may not serve as treasurer or deputy treasurer of a political committee. In addition, a person may not serve as treasurer or deputy treasurer if the person has been convicted of or pled guilty or nolo contendere to any felony involving fraud, forgery, larceny, embezzlement or bribery, or any criminal offense under the state election or campaign finance laws unless at least eight years have elapsed from the date of the conviction or plea or the completion of any sentence, whichever date is later, without a subsequent conviction of or plea to another such felony or offense.

[General Statutes §§ 9-601 (27), 9-605(e), 9-606(d), 9-610(i)]

D. Registration Statement Requirements

Important Note: For more information on how to complete the registration statement ([SEEC Form 3](#)), please see the [instructions](#) to the form, available on the Commission's website.

A registration statement must contain the following:

1. The name and address of the committee.
2. The name, address, telephone number, and email address (if applicable) of the committee's chairperson, treasurer, and deputy treasurer (if applicable).
3. The name and address of the depository institution in Connecticut in which a single checking account is established for the committee's funds.
4. The name, address, and title of any other officers (if applicable).
5. Whether the political committee is established by two or more individuals, a business entity, or a labor union or other organization, or by legislative leadership or caucus.
6. A statement indicating the purpose of the political committee, i.e. whether the committee is established for a single primary, election or referendum – a “durational” political committee – or for ongoing political activities – an “ongoing” political committee.
7. For ongoing political committees, whether it is formed to influence state elections (statewide offices, General Assembly, probate judge), municipal elections (mayor, first selectman, alderperson, board of education, etc.), or both.



8. For political committees formed to support or oppose any referendum question or constitutional amendment in addition to candidates, a brief statement identifying the substance of the referendum question.
9. For durational political committees formed to support a single or multiple candidates, the name and party affiliation of each candidate that the committee supports and the office sought by each candidate.
10. For political "slate committees," the names of the candidates who established the committee and whose campaigns the slate committee will fund (the committee must fund at least two candidates).

Important Note: For more information on political slate committees serving as the funding source for a slate of candidates, please refer to the Commission's [A Guide for Municipal Candidates](#).

11. If the political committee is established by a business entity, labor union or other organization or association, the name of the entity, union or organization.
12. If the political committee is established by a labor union or other organization, whether it will receive funds from the organization's treasury or from voluntary member contributions.
13. If the entity, union or organization which established the political committee is a component member of a statewide entity, the name and address of the statewide entity.
14. If the committee is established or controlled by a member of the General Assembly, an elected state officer, or a lobbyist registered with the Office of State Ethics or immediate family member, or any principal of a state contractor, prospective state contractor, or investment services firm, or an agent of any of the above, a statement disclosing that relationship and the name of the member of the General Assembly, elected state officer, lobbyist or principal. Note that there are two types of lobbyists in the State of Connecticut – the individual communicator lobbyists who lobby at the Legislature and the client lobbyists that retain them.
15. If the political committee is formed to support candidates from a particular state legislative district, a statement to that effect and the district number.
16. If the political committee files reports with the Federal Election Commission or any out-of-state agency, a statement to that effect, including the name of the agency.
17. The name and address of the individual, business entity or labor organization making the initial contribution or disbursement to the political committee. If the initial contribution or disbursement precedes the filing of the registration statement, the political committee treasurer must file an itemized campaign finance disclosure statement ([SEEC Form 20](#)) itemizing this transaction along with the registration statement. If the contribution or disbursement is made after the filing of the registration statement, the treasurer must file an itemized statement ([SEEC Form 20](#)) within 48 hours of receiving that initial contribution or disbursement.



18. A designation indicating whether the political committee is authorized to make contributions or expenditures for the benefit of candidates for statewide office and/or General Assembly. **The chairperson may designate only those offices to which the political committee can legally contribute under Connecticut law.**
19. Signed and dated certifications by the chairperson, treasurer, and deputy treasurer (if applicable) of the political committee. (Please note that a special certification applies to political committees which are legislative caucus or leadership committees.)

[General Statutes §§ 9-602(a), 9-605(b)]

E. Biennial Re-Registration

All ongoing political committees registered with the Commission are required to file either a [SEEC Form 3](#) or [SEEC Form 3NC](#) with the Commission by November 15 of every even-numbered year. A committee may file a [SEEC Form 3NC](#) if there have been no changes, additions, or deletions to the information contained on the committee's most recent [SEEC Form 3](#) on file with the Commission at the time of the biennial filing requirement. It is the treasurer's duty to file the appropriate statement to fulfill the biennial requirement, unless it involves a change in officer, in which case the chairperson must sign the amendment.

The failure to file by the applicable deadline will result in the committee being deemed subject to limitations on making and receiving certain contributions during the legislative session. See [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#) for more information about these limitations. This amended registration requirement replaces the B-2 and B-3 forms. Rather than complete additional forms, committees simply have to submit an amended registration every two years. This also helps committees ensure that the information on file with the Commission is current and accurate.

Please keep in mind that the law continues to require political committees to submit an amended registration statement ([SEEC Form 3](#)) to the appropriate filing repository within ten days of any additions or revisions to the information contained in their registration statement.

[General Statutes §§ 9-605(c), 9-610(e) and (f)]

F. "One Person One PAC" Rule

No individual may establish or control more than one political committee.

Two key factors, among many, that could demonstrate that an individual has established or exercises control of a political committee include:

1. Serving as chairperson, treasurer or deputy treasurer of the committee; and
2. Making the initial contribution to the committee.

Note that this prohibition does not extend to party committees and candidate committees. Accordingly, an individual may serve as the treasurer of both a political committee and a party committee or candidate committee under the law.



A business entity, labor organization, or other person may only establish or control a single political committee. To ensure compliance with this limitation, the business entity, labor organization or other person establishing or controlling a political committee must disclose this affiliation on the committee's registration statement ([SEEC Form 3](#)).

[General Statutes §§ 9-605(e)(1), 9-613(a), 9-614(a)]

Important Note: While an ongoing political committee and party committee may make joint expenditures and may coordinate expenditures with each other, they must be separate committees. A party committee or ongoing political committee may not form any other political committees. See General Statutes § 9-609(a).

G. Legislative Leadership and Legislative Caucus Committees

The members of the same political party for each chamber of the General Assembly – i.e., Senate Democrats, House Democrats, Senate Republicans, and House Republicans – may each establish one legislative caucus committee. The chairman of each legislative caucus committee must complete a specific certification on the committee's registration statement ([SEEC Form 3](#)).

The six highest-ranking leaders of the General Assembly (Speaker of the House, Majority Leader of the House, Minority Leader of the House, President Pro Tempore of the Senate, Majority Leader of the Senate, Minority Leader of the Senate) may each establish a legislative leadership committee. The minority leaders of the House and Senate may also each have an additional legislative leadership committee. These committees must be designated by the respective legislative leader on the committee registration statement ([SEEC Form 3](#)).

These political committees are exempt from the "One Person One PAC" restriction. Thus, an individual may serve as treasurer of another political committee in addition to serving as treasurer of a legislative leadership or legislative caucus committee.

Legislative leadership and legislative caucus committees may only contribute to and make expenditures benefiting legislative candidates. Candidates participating in the Citizens' Election Program may not accept contributions from one of these legislative political committees, though these committees may still make organization expenditures on behalf of such candidates, as discussed later in [Chapter VII. Spending Committee Funds](#).

[General Statutes §§ 9-605(e), 9-618(d), 9-619(d)]

H. Political Committees Formed to Support a Single Candidate

A candidate is prohibited from having more than one candidate committee registered as the funding vehicle for his or her campaign. A candidate who has registered a candidate committee may not establish, authorize or assist in the establishment of any other committee to promote the candidate's campaign.



Consistent with this prohibition, the chairperson of a political committee **formed solely to support a single candidate** must notify the candidate of the formation of the political committee by certified mail not later than seven days after the political committee is established. If the candidate does not disavow the political committee in writing to his or her filing repository (the State Elections Enforcement Commission or the town clerk, as the case may be) within fourteen days after receiving such notification, or if the candidate accepts any funds from the political committee, the political committee is automatically deemed to be the candidate's candidate committee. A violation of this prohibition against having two simultaneously existing committees is considered an extremely serious violation of the election laws.

[General Statutes § 9-604(a), (b), and (c)]

I. Political Committees Registered Under Federal Law or in Other States

A political committee registered with the Federal Election Commission under federal law or with another state other than Connecticut may not make coordinated expenditures or contributions to or for the benefit of a Connecticut state or municipal candidate or a Connecticut traditional political committee or party committee. A separate committee must first be registered in Connecticut (by filing a [SEEC Form 3](#), designating a treasurer and a depository institution situated in Connecticut) and then must solicit funds specifically for use in Connecticut campaigns in accordance with Connecticut's campaign finance laws. There is one exception to this strict rule – a national committee of a political party may use its federal account to make contributions to an ongoing political committee.

Treasurers of traditional political committees receiving such contributions from entities not registered as committees in Connecticut must return the contributions immediately to the donor. Treasurers should check with the town clerk and the State Elections Enforcement Commission to determine whether a committee is properly registered to make contributions in Connecticut.

[General Statutes §§ 9-602(a), 9-618(e); [Opinion of Counsel 1986-2](#)]

J. Social and Political Clubs

Sometimes, two or more individuals will form a group or club that raises or spends money on diverse things, including (but not limited to) promoting or opposing candidates or referendum questions and promoting or opposing various social or economic issues not related to candidates or political parties. Such groups or clubs need to distinguish between their campaign finance-related funds, which are regulated by the Commission, and their other expenditures, which fall outside of campaign finance law and thus are not regulated by the Commission.

When such groups or clubs formed by two or more individuals acting together wish to make coordinated expenditures or contributions to or for the benefit of a Connecticut state or municipal candidate or a Connecticut political committee or party committee, they must register a traditional political committee ([SEEC Form 3](#)) unless they qualify for the \$1,000 "safe harbor" described earlier. The group or club's political committee must



maintain a separate checking account – a “political account” – in a Connecticut financial institution.

If the club or group wishes to engage in social or other activities that do not fall within the lawful purpose of a political committee or are otherwise permitted by [Chapter 155](#), they may **not** do so using the political committee's account. To spend money on such non-campaign finance related activities, the group or club must establish a checking account not associated with the political committee. Funds raised and spent through this non-political account do not need to be disclosed under the campaign finance laws (unless they are being spent on an independent expenditure made directly by the group or club) – however, it is recommended the group keep internal records for receipts and expenses made through the non-political account in the event a complaint is filed that it made an impermissible expenditure.

Important Note: In order to avoid making an impermissible expenditure from the political committee account, or to avoid making an expenditure from the non-political committee account that should have been made from its political committee, it is critical to understand the difference between the two accounts. For example, if a social club decides it would like to spend money to raise awareness about an environmental issue, it may not use political committee funds for this purpose but rather should use its non-political committee account. In contrast, if a social club decides it would like to make a contribution to a candidate, it **must** use its political committee funds, since this type of activity is regulated under the campaign finance laws.

With respect to holding events, a club with a political committee should pay for non-political events from the “social account” and political events from the “political account.” The club must also identify which account will receive proceeds of any fundraising event. The non-political account may be used for the deposit of funds received in connection with any fundraising event or drive for a specified non-political purpose. The social or non-political purpose of the event or drive should be made known to all prospective donors to the account. By contrast, the political account may only be used for the deposit of club dues intended for the political committee, contributions for the committee's political activities, and for the payment of the club's general operating or political expenses.

Important Note: The law expressly permits an ongoing political committee to make 501(c)(3) charitable contributions and memorial contributions. Accordingly, such social clubs may make 501(c)(3) charitable contributions or memorial contributions from either their political committee account or their non-political account.

[General Statutes §§ 9-601c, 9-602(a), 9-618(a)]