



IV. The Role of the Treasurer

A. Makes and Authorizes Expenditures

Only a committee's designated treasurer (or deputy treasurer, when necessary) may authorize and make contributions or expenditures on the committee's behalf. All committee expenditures **must** be authorized by the treasurer and, generally speaking, must be paid by check or debit card drawn on the committee's checking account or by the committee's credit card. Committee checks must contain the committee's name and address, as well as the name of the committee's treasurer.

If the committee has a credit card, the treasurer and deputy treasurer, if applicable, are generally the only individuals who are authorized cardholders. The treasurer may, however, allow the chairperson or a committee worker to be an authorized cardholder of a credit card issued to the committee, provided that the individual's expenditures are: (1) for goods or services that are pre-authorized by the treasurer; and (2) for a lawful purpose of the committee. The treasurer should be particularly careful in opting to authorize the chairperson or a committee worker as an authorized cardholder as such authorization will mean that all expenditures made by the cardholder on that credit card will be deemed to have been authorized by the treasurer, even if the cardholder failed to obtain actual authorization for the particular expenditure in question.

A chairperson or committee worker may only be an authorized holder of a committee credit card, which is paid on a periodic basis. A debit card, which draws directly from the committee checking account, is treated differently under the law. Committee debit cards may **only** be used by the treasurer (or deputy treasurer, when necessary).

[General Statutes § 9-607(a), (d), (e), (g)(2)(O), (j) and (l)]

B. Deposits All Monetary Receipts

The treasurer must deposit all funds in the committee's single checking account within **twenty days** of receipt.

The treasurer must ensure that any funds received by the committee are lawful and within the aggregate limits permitted under campaign finance law. The treasurer should not deposit any receipt that is either prohibited or otherwise exceeds the permissible limits set forth by law. Instead, the treasurer should return it to the donor within fourteen days of receipt or by the filing deadline for transactions falling within the reporting period, whichever is earlier.

If the treasurer deposits a monetary receipt that is later deemed impermissible, the treasurer must report it on the financial disclosure statement ([SEEC Form 20](#)) and refund the contribution without delay by returning the amount to the donor using a check drawn on the committee's checking account. The treasurer should report any such refund as an expenditure in Section P of the [SEEC Form 20](#) using the "REF" purpose of expenditure code. Whenever possible, such refunds should be made in the same reporting period that the funds were deposited. The same rules apply to nonmonetary receipts from improper sources or in excess of the relevant contribution limits.



[General Statutes §§ 9-606(a), 9-607(g)(2)(R), 9-608(c)]

C. Retains All Records and Receipts

The treasurer must retain internal records to substantiate all expenditures made by the committee as permissible. Examples of expenditure records include, but are not limited to:

- bank statements
- travel itineraries
- credit card and debit card slips and statements
- copies of fundraiser tickets
- copies of printed advertisements (flyers, postcards, etc.)
- loan agreements
- cancelled checks
- invoices
- written receipts supporting any requests for reimbursement
- copies of invitations
- compensation agreements
- copies of checks
- bills
- cash register receipts
- copies of ad books for fundraising affairs
- solicitor appointments
- documents describing expenditures incurred but not yet paid

These internal records must be kept for **four years** from the date of the financial disclosure statement in which the transactions were entered.

[General Statutes §§ 9-606(a), 9-607(f), 9-608(c)(1)]

There are two recordkeeping requirements under the law that are worth highlighting.

First, in all instances where the committee agrees to pay someone more than \$100 for their work or services, there must be a **written agreement** entered with the individual, as discussed more fully below.

Second, treasurers are required to keep an internal list of all individuals they appoint as **solicitors** for the committee, as discussed more fully below.

For more guidance on the types of information that must be collected and retained, see [Chapter VIII. Reporting Information](#).

D. Maintains Service Agreements

In all instances where the committee agrees to pay a professional person more than \$100 for his or her committee services, there must be a **written agreement** entered with the individual, signed **before** any such work or service commences, which sets forth (1) the nature and the duration of the fee arrangement; and (2) a description of the scope of the work to be performed or services to be rendered. The treasurer must also maintain contemporaneous records and/or invoices detailing the work performed or services rendered.



Important Note: If an agreement will involve, for example, paying a consultant who will be paying other vendors (i.e. secondary payees), the committee will best be served by including in the written agreement a requirement that the consultant disclose any secondary payees to the committee, and any pertinent information relating thereto, so that the committee treasurer can properly disclose such secondary payments, as required by law. See General Statutes § 9-608(c)(1).

Our [sample fee arrangement for work or service](#), available on our website, provides language regarding this requirement for you to use in your contract with a consultant. We also have a [sample reimbursement & secondary payee information sheet](#) for the consultant to provide you when they are seeking reimbursement for an expenditure they made on behalf of the committee.

[Regulations of Conn. State Agencies § 9-607-1]

E. Files Periodic Financial Disclosure Statements

The treasurer is also obligated to file all financial disclosure statements on behalf of the political committee. For more information on how and when to submit financial disclosure statements, see [Chapter VIII. Reporting Information](#).

[General Statutes § (9-608a)]

F. Appoints and Oversees Solicitors

The only individuals who may receive monetary and non-monetary contributions and donations on behalf of a political committee are the treasurer, deputy treasurer, and solicitors. Anyone other than the treasurer or deputy treasurer who receives funds must be appointed as a solicitor by the treasurer. The treasurer may appoint as many solicitors as needed. The treasurer must keep an accurate list of the name and address of each individual who is appointed to serve as a solicitor. Although the names of solicitors need not be disclosed in the committee's financial disclosure statements, the law requires the treasurer to keep internal records, outlining each solicitor appointment and the term of appointment, which may be subject to audit. The treasurer is responsible for training solicitors and overseeing their activities to make sure they are complying with the law.

A solicitor may never deposit committee funds; only the treasurer may deposit funds received by the committee. Within **seven days** of receipt of any goods, funds or contributions, the solicitor must deliver the same to the treasurer. The treasurer must deposit funds within **twenty days** of her receipt from the solicitor, or return impermissible contributions to the contributor(s). A solicitor may not expend funds that he receives and must deliver them only to the treasurer in the form he received them (i.e. cash received from contributors must be delivered in same cash form to the committee's treasurer).

No later than one day prior to the treasurer's required filing date, each solicitor must submit to the treasurer a list of the contributor information (names, addresses, and all other legally required information) of all persons from whom or from which the solicitor collected monetary and/or non-monetary receipts on behalf of the committee. The treasurer must oversee committee solicitors, ensuring that they turn over this list, as well



as all contributions received, in a timely manner. The treasurer is also responsible for training and overseeing solicitors to make sure they are complying with the law.

No person may solicit contributions that are prohibited by law.

[General Statutes §§ 9-606(c), 9-622(10)]

G. Limitations on Who May Solicit Contributions

While communicator lobbyists and principals of current and prospective state contractors are no longer completely prohibited from soliciting for certain political committees, some restrictions on their solicitation activities remain:

- Communicator lobbyists, as well as their agents and immediate family members, may not bundle contributions for a political committee established or controlled by a candidate for statewide office or General Assembly, including legislative leadership and legislative caucus committees. "Bundle" is defined as the forwarding of five or more contributions to a single committee by the communicator lobbyist or his immediate family member or agent, or raising contributions for a committee at a fundraising event held by, sponsored by, or hosted by the communicator lobbyist or his immediate family member or agent.
- Communicator lobbyists, as well as their immediate family members and agents, may not solicit on behalf of a political committee established or controlled by a statewide office or General Assembly candidate from any individual who is a member of the board of directors, an employee of or a partner in, or who has ownership interest of five percent or more in any client lobbyist they represent.
- Communicator and client lobbyists are prohibited from soliciting contributions during legislative session, which includes any regular legislative session and any special sessions or vote-override sessions in odd-numbered years, on behalf of a political committee: (1) established for an assembly or senatorial district; (2) established by, in consultation with, or at the request or suggestion of a General Assembly member or statewide officeholder or their agent; or (3) controlled by a General Assembly member or statewide officeholder or their agent to aid or promote the nomination or election of any candidate or candidates to the General Assembly or statewide office.
- No state contractor or prospective state contractor or principals thereof with respect to a contract with the executive branch may knowingly solicit contributions on behalf of a political committee authorized to make contributions or expenditures for the benefit of statewide office candidates from the contractor's employees or one of its subcontractors or the principals of the subcontractor.
- No state contractor or prospective state contractor or principals thereof with respect to a contract with the legislative branch may knowingly solicit contributions on behalf of a political committee authorized to make contributions to or expenditures for the benefit of General Assembly candidates from the contractor's employees or one of its subcontractors or the subcontractor's principals.



Note that a political committee may be subject to one or more of these restrictions depending on how it is organized.

[General Statutes §§ 9-601(26), 9-610(e), (h), and (i), 9-612(f)]

The following individuals are prohibited from soliciting contributions from a principal of an investment services firm on behalf of any political committee: the State Treasurer or any candidate for State Treasurer, any agent of any such candidate, the Deputy State Treasurer, any member of the State Investment Advisory Council, and any unclassified employee in the office of the State Treasurer acting on behalf of the State Treasurer or Deputy State Treasurer.

[General Statutes § 9-612(f)]

For more information on the state contractor, lobbyist, and investment services solicitation provisions, please see [Chapter VI. Restrictions Based on Who Gives and Solicits Funds](#).

Elected statewide officeholders and deputies, as well as members of the General Assembly, may generally solicit for political committees. However, statewide officeholders and General Assembly members, any candidates for such offices, and agents of any such officials or candidates may not knowingly, willfully or intentionally solicit contributions on behalf of a political committee from a person who she knows is prohibited from making contributions, including a principal of a state contractor or prospective state contractor with regard to a state contract solicitation with or from a state agency in their respective branch.

[General Statutes § 9-612(f), [Advisory Opinion 1983-2](#)]

Municipal employees may not solicit funds for the benefit of a political committee from an individual under their supervision or that individual's spouse or dependent children.

[General Statutes § 9-622(12)]

No member of the Connecticut Retirement Security Authority board of directors, except the State Comptroller or State Treasurer, or any executive director, assistant executive director or authorized officer appointed by said board or the principal of an entity with a contract with the authority to administer the Connecticut Retirement Security Program may knowingly solicit contributions from the board's or the executive director's or assistant executive director's employees on behalf of a political committee authorized to make contributions or expenditures to or for the benefit of statewide office candidates.

[General Statutes § 31-429 (as amended by [Public Act 16-29](#))]



V. Raising Funds for Your Committee

A political committee may raise funds by collecting contributions. While contributions are often monetary in nature, they may take other forms as well. In addition to contributions which may be subject to limits on the amount that may be given, there are other types of funds or things a committee may receive that do not count toward the contributor's contribution limits in the case of traditional political committees. These few categories are narrowly defined. In most instances, these receipts or "donations" remain reportable.

Political committees may raise funds by holding fundraising events, which include political gatherings sponsored by the committee for which it charges an attendance fee, or tag sales or auctions at which the committee sells items to its invited guests. The issues which most commonly arise concerning a fundraising event are whether the funds given or received are treated as contributions or as receipts which are not contributions, and how to disclose these types of receipts, if at all, on the committee's financial disclosure statement.

This section provides information regarding permissible and impermissible contributions, other permissible sources of funds for political committees, and the appropriate means by which funds may be collected. For more information on how to report these contributions and receipts, see [Chapter VIII. Reporting Information](#).

A. Contributions

1. Sources and Limits

The following section lays out the contribution limits imposed on traditional political committees based on the type of political committee.

a. Business Entity Political Committees

Permissible Contributions

A traditional political committee established by a business entity may accept contributions subject to the following aggregate limits per contributor per calendar year:

Table 1 - Contribution Limits to Traditional Business Entity Political Committees

CONTRIBUTOR	LIMIT
Individual	\$1,000*
Another Political Committee	\$2,000**
State Central Committee	\$2,500
Town Committee	\$1,500
National Committee of a Political Party	Unlimited***