

September 4th, 2013

State Elections Enforcement Commission
20 Trinity Street
Hartford, CT 06106

Attn: Enforcement/Compliance Unit

I am over the age of 18 and understand the obligations of an oath. I am submitting the following complaint and request for an investigation by your office:

On or about September 4, 2013, I reviewed the Itemized Campaign Finance Disclosure Statement, SEEC Form 20, of the "Connecticut Education Association Political Action Committee," (CEAPAC) dated 9/3/2013, 7:11:54AM, and covering the period beginning 07/01/2013 and ending 09/02/2013, filed in your office, as well as the same form for essentially the same period, beginning 08/02/2013 and ending 09/03/2013, for the "Better Education Starts Today" slate committee (BEST), which represents candidates for the Bridgeport Board of Education Andre Baker, Howard Gardner and Dave Hennessey for the 09/10/2013 Democratic Primary (Primary), dated 09/03/2013 and filed with the town clerk of the City of Bridgeport.

The Form 20 for the CEA states that the type of report is "Independent Expenditure Candidate Primary – Original". All of the expenditures reported for this period, with the exception of one, relate to the Primary, for a total of \$37,553.19.

My concern is that this number far exceeds the limits for PAC contributions to either an individual candidate for a municipal office or for a slate committee. CEAPAC alleges that these are "independent expenditures" (IE's), as defined in Section 9-601c of the Connecticut General Statutes, as amended by Section 4 of Public Act 13-180. This seems to be contrary to the facts.

Subsection (b) of said section 9-601c, as amended, includes a list of rebuttable presumptions that would indicate an expenditure is not an IE. Virtually all of these presumptions seem to be present here.

In particular, the new Subdivision (5) of that Subsection reads: "(5) An expenditure made by a person or an entity on or after January first in the year of an election in which a candidate is seeking public office that benefits such candidate when such person or entity has hired an individual as an employee or consultant and such individual was an employee of or consultant to such candidate's candidate committee or such candidate's opponent's candidate committee during any part of the eighteen-month period preceding such expenditure". I have attached a list of 12 persons who received wages from CEAPAC and "canvas for signature" payments from BEST just during the covered

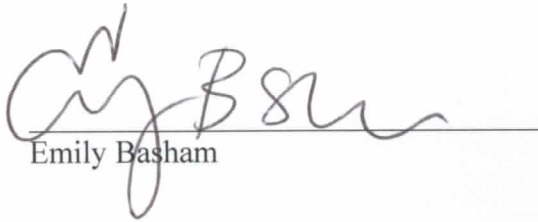
period. Additionally, Charles Coviello, a prominent local politician, is listed as receiving \$1,500 in wages on the CEA filing and was one of the persons gathering petitions for the placement of the slate on the Primary ballot. Also, Robert Traber, Vice-President of the Bridgeport Education Association, the local affiliate of the Connecticut Education Association, is listed as having received numerous reimbursements from BEST for items such as office supplies, keys, etc.

Further evidence of coordination is shown in the attached email from the same Robert Traber, dated August 6, 2013, 12:51:18 PM EDT, directing petitioners to bring petitions to the BEA office where they could be notarized before filing.

These items are obvious from the face of the documents. Others may be revealed by a more extensive review.

For all the reasons set forth above, I respectfully request that your agency fully investigate this matter.

Subscribed and sworn to this 4th day of September, 2013



Emily Basham

By: _____
Commissioner of the Superior Court/Notary Public

Attached: List of wage earners from both committees
Email regarding petitions