



STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION
20 Trinity Street • Hartford, Connecticut 06106 - 1628

March 2, 2007

Kevin N. Reynolds
Legal Counsel
Connecticut Democrats
179 Allyn Street, Suite 301
Hartford, CT 06103

Re: Opinion of Counsel 2007-2 - Applicability of State Campaign Finance Law to Solicitations for or Contributions to a State Central Committee's Federal Account

Dear Attorney Reynolds:

This will respond to your letter dated February 11, 2007 which was received by the Commission on February 26, 2007 concerning the application of state campaign finance laws to a fundraising event or effort by the Democratic State Central Committee ("DSCC") where the funds raised will be deposited only into the DSCC's federal account. In that letter you state that "the DSCC will hold its annual Jefferson Jackson Bailey Dinner to raise money for the DSCC" and the DSCC "will accept contributions made to the DSCC's federal account." You add that "[n]o contributions to the state account will be accepted, nor will any expenditures from the state account be made as part of this year's Jefferson Jackson Bailey Dinner."

Connecticut's newly revised State Campaign Finance Laws prohibit communicator lobbyists, their spouses, and dependent children 18 years of age or older, principals of state contractors and prospective state contractors, including their spouses, and dependent children 18 years of age or older, and any political action committee established or controlled by any of the persons in these restricted classes, from making or soliciting contributions to, or for the benefit of a state central committee's state account that is used to support state and local candidates for nomination or election to such offices. See Connecticut General Statutes §§ 9-612 (g) (2) (A), (B), as amended by Public Act 07-1, and 9-610 (h), (i).

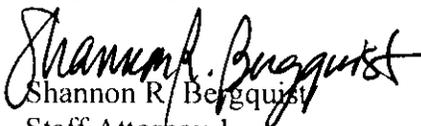
These restrictions do not, however, apply to contributions made to a state central committee's federal account which had been established pursuant to federal election laws

to support candidates for nomination or election to federal offices. See 2 U.S.C. 453; 11 C.F.R. 108.7 (a).

Accordingly, Connecticut's campaign finance laws will not apply to a fundraising event or effort by the Democratic State Central Committee ("DSCC") where the funds raised will be deposited only into the DSCC's federal account. Nevertheless, to avoid the appearance of violating the ban against soliciting prohibited contributions (Conn. Gen. Stats. § 9-622 (10)) we recommend that the DSCC's solicitations or invitations expressly state that it is soliciting funds only for its federal account.

This constitutes an opinion of counsel. I trust that this information will be useful to you. Please do not hesitate to contact me if you have further questions or if we can be of further assistance to you.

Very truly yours,


Shannon R. Bergquist
Staff Attorney I