

STATE OF CONNECTICUT
STATE ELECTIONS ENFORCEMENT COMMISSION

In the Matter of a Complaint by William Dove, Broad Brook (East Windsor) File No. 2024-028

CONSENT ORDER AND STIPULATED AGREEMENT

This agreement, by and between Angelo Sevarino, Town of East Windsor, State of Connecticut, and the authorized representative of the State Elections Enforcement Commission (hereinafter “Commission”), is entered into in accordance with Section 9-7b-54 of the Regulations of Connecticut State Agencies and Section 4-177 (c) of the General Statutes of Connecticut. It is hereby agreed that:

1. The complaint by William Dove of East Windsor alleged that Angelo Sevarino, Treasurer of the Friends of Jason 2023 committee, impermissibly delegated his duties to a consultant, Blue Edge Strategies, and on the January 10th filing, Angelo Sevarino failed to disclose any consulting fees or document services performed by consultants, failed to provide appropriate information for expenditures associated for six mailers, and failed to identify secondary payees, and failed to provide needed information for individual donors. Furthermore, the complaint alleges that Candidate Jason Bowsza failed to provide the appropriate attribution or disclaimer on six printing mailers, and the campaign accepted \$1000 in the form of cash donations.
2. The Respondents are Angelo Sevarino, Treasurer of the Friends of Jason 2023, and Jason Bowsza, First Selectman candidate for the Friends of Jason 2023.¹

Relevant Legal Authority

3. The matter is governed by Connecticut General Statutes § 9-606 (a) which provides in pertinent part:

The treasurer of each committee shall be responsible for (1) depositing, receiving and reporting all contributions and other funds in the manner specified in section 9-608, (2) making and reporting expenditures, (3) reporting expenses incurred but not yet paid, (4) filing the statements required under section 9-608, and (5) keeping internal records of each entry made on such statements.

¹ On March 27, 2025, pursuant to General Statutes § 9-7a (g) (1), the resolve-by date was extended to May 26, 2025 by the agreement of all Respondents.

4. The matter is further governed by Connecticut General Statutes § 9-608 (a) which provides in pertinent part:

- (1) Each treasurer of a committee, other than a state central committee, shall file a statement, sworn under penalty of false statement with the proper authority in accordance with the provisions of section 9-603, (A) on the tenth calendar day in the months of January, April, July and October, provided, if such tenth calendar day is a Saturday, Sunday or legal holiday, the statement shall be filed on the next business day, except that in the case of a candidate or exploratory committee established for an office to be elected at a special election, statements pursuant to this subparagraph shall not be required,...

5. The matter is further governed by Connecticut General Statutes § 9-608 (c) which provides in pertinent part:

- (1) Each statement filed under subsection (a), (e) or (f) of this section shall include, but not be limited to: (A) An itemized accounting of each contribution, if any, including the full name and complete address of each contributor and the amount of the contribution; (B) an itemized accounting of each expenditure, if any, including the full name and complete address of each payee, including secondary payees whenever the primary or principal payee is known to include charges which the primary payee has already paid or will pay directly to another person...

Facts Found After an Investigation

6. In response to the complaint, Respondent Bowsza was able to provide digital copies of the five mailers, not six as indicated in the complaint. The mailers are labeled Mailer 1, Mailer 2, Mailer 3, Mailer 5, and Mailer 6. There is not a Mailer 4, which accounts for the discrepancy in mailer titles and the actual number of mailers. A review of the disclaimers revealed that said disclaimers had the appropriate “paid for” and “approved by” language.

7. In response to the complaint, Respondent Sevarino provided a statement in which he admitted that “the Committee did not initially include the disclosure of secondary payees associated with campaign meal or campaign food,” and he noted that changes were made on the amended January 10th financial disclosure statement. Also, Respondent Sevarino supported the claim that there were only five mailers sent out by the campaign. Furthermore, Respondent Sevarino stated that the mail consultant was used only to perform duties “related to the design and distribution of campaign mail.” Lastly, Respondent Sevarino admitted that the campaign received

one occurrence of a cash donation over \$100, and afterwards, the campaign reimbursed the donor the amount over \$100 with check number 1014.

8. The SEEC Form 20 for the January 10th filing, the Amended January 10th filing, the April 10th filing, and the Termination filing were requested from the East Windsor Town Clerk. Upon review of the original January 10th filing, secondary payee information was not listed.

9. An examination of the original January 10th filing revealed that Respondent Sevarino listed out the expenditures associated with Blue Edge Strategies, a campaign consultant agency, performing advertisement related services, such as Facebook marketing and sending mailers, on a separate sheet of paper attached to the filing. Additionally, Respondent Sevarino provided copies of the invoices associated with expenditures related to Blue Edge Strategies.

10. The Amended January 10th filing, received by the Town Clerk on May 1, 2024, did include secondary payee information. This was included as a separate list to the filing document. Additionally, the data was listed in the appropriate section, "T. Itemization of Reimbursement and Secondary Payee."

11. Although the January 10th filing and Amended January 10th filing showed the full name of individual contributors and the amount of the contribution, neither the January 10th filing nor the Amended January 10th filing indicated the address of the individual contributors.

12. An examination of the Amended January 10th filing revealed that Contributor John Burnham made a \$1,000 cash donation. Respondent Sevarino stated in his response that this was corrected by reimbursing the impermissible \$900 back to the donor, John Burnham, via check number 1014. However, there was no listing in the Amended January 10th or the April 10th filings to confirm this report.

13. On March 25, 2025, Commission staff called Respondent Sevarino to inquire about the circumstances surrounding the issuance of the check number 1014 for \$900 to John Burnham. Respondent Sevarino explained that the M & T bank sent him a notice stating that John Burnham's attempt to cash the check was blocked due to the account being closed. According to Respondent Sevarino, John Burnham did not cash the check number 1014 immediately after receiving the check.

14. On March 26, 2025, Commission staff called Respondent Sevarino, and he confirmed the use of the contribution cards and Andedot to collect contributions, and both methods would have required a contributor to provide their address. On March 27, 2025, Commission staff collected documents from Respondent Sevarino.

15. On April 7, 2025, a review of the documents received from Respondent Sevarino showed a M&T Bank notice indicating that the check number 1014 for \$900 was marked “item returned-Frozen blocked” when there was an attempt to cash the check. Additionally, there was a March 21, 2025 email correspondence between Respondent Bowsza and Respondent Sevarino. In the March 21, 2025 email correspondence, Respondent Bowsza informs Respondent Sevarino that he contacted the Commission on June 25, 2024, and followed up with an email on July 8, 2024. However, Respondent Bowsza alleges that the Commission did not respond. In the July 8, 2024 email from Respondent Bowsza to Commission staff, Respondent Bowsza stated that Respondent Sevarino experienced medical issues in March of 2024 and experienced medical complications leading to hospitalization in early July of 2024. Upon investigation, it was discovered that Commission staff left a voice message for Respondent Bowsza, and Respondent Bowsza may not have responded to said voice message.

16. Also, on April 7, 2025, during a phone call with Commission staff, Respondent Sevarino confirmed the health complications as indicated by Respondent Bowsza in the emails received from Respondent Sevarino on March 27, 2025.

17. An examination of the Termination Report filed by Respondent Sevarino, which was received by the Office of the Town Clerk on June 24, 2024, reveals that the Friends of Jason 2023 committee terminated with a balance of zero dollars after transferring the beginning balance of \$4,534.58 to organization or entity called Better Days Ahead.

Analysis and Conclusions of the Law

18. The Commission determines that, pursuant to General Statutes § 9-606 (a), Respondent Sevarino, as the Treasurer of the Friends of Jason 2023 committee, was responsible for depositing, receiving and reporting all contributions and other funds in the manner specified in section 9-608 and making and reporting expenditures.

19. The Commission determines that, pursuant to General Statutes § 9-607 (g), Respondent Sevarino could only make expenditures that were for the lawful purposes of the Friends of Jason 2023 committee.

20. The Commission determines that, pursuant to General Statutes § 9-608 (c), Respondent Sevarino should have provided the secondary payee information and listed the address of the contributors on the original January 10th filing.

21. The Commission notes that, if the \$1,000 cash contribution was caught originally, Respondent Sevarino should have returned the entire \$1,000 cash contribution and resolicited the contribution in an appropriate manner.

22. The Commission concludes that, upon filing the original January 10th filing with the Office of the Town Clerk on or about January 4, 2024, Respondent Sevarino violated General Statutes § 9-606 (a) and § 9-608 (c) because, among other things, Respondent Sevarino admitted to not providing the secondary payee information on the original January 10th filing, the original January 10th filing did not report secondary payee information, and the address of the contributors was not listed on the original January 10th filing.

23. The Commission concludes that, because Respondent Sevarino, as Treasurer, was responsible for the receipt of “all contributions” by the Friends of Jason 2023 committee, Respondent Sevarino violated General Statutes § 9-606 (a) given that the Friends of Jason 2023 committee received a \$1,000 cash contribution and the receipt of cash contributions over \$100 by any person is prohibited by General Statutes § 9-622.

24. The Commission concludes that, because General Statutes § 9-607 (g) expressly authorizes expenditures related to payment of “consultants...for campaign activities,” Respondent Sevarino did not violate General Statutes § 9-607 (g) by paying for Blue Edge Strategies services as detailed herein.

25. The Commission determines that, pursuant to General Statutes § 9-608 (c), Respondent Sevarino provided an itemized accounting of expenditures, including the cost, associated with Blue Edge Strategies services on the original and Amended January 10th filing.

26. The Commission determines that, pursuant to General Statutes § 9-621, all five mailers at issue have the appropriate “paid for” and “approved by” language.

Penalty Considerations

27. Pursuant to Connecticut General Statutes § 9-7a, the Commission has the authority to impose civil penalties for violations of the election statutes, including Connecticut General Statutes § 9-606 (a) and § 9-608 (c). Although the maximum penalty available is \$2,000 per offense or violation, the Commission has the authority to set a lesser penalty where circumstances call for such leniency pursuant to Section 9-7b-48 of the Regulations of Connecticut State Agencies.

28. The Commission notes Respondent Sevarino’s cooperation with its investigation, his acknowledgment of responsibility and his willingness to enter into this Consent Order and Stipulated Agreement.

29. The Commission concludes that ordering Respondent Sevarino to henceforth strictly comply with Connecticut General Statutes § 9-606 (a) and § 9-608 (c) and pay a civil penalty in the amount of two hundred dollars (\$200) to the Commission within ten (10) days of the Commission's adoption of this Agreement Containing a Consent Order is sufficient to ensure immediate and continued compliance.

30. Respondent Sevarino admits all jurisdictional facts and agrees that this agreement and Order shall have the same force and effect as a final decision and Order entered after a full hearing and shall become final when adopted by the Commission.

31. It is understood and agreed that this agreement will be submitted to the Commission at its next available meeting, and, if it is not accepted by the Commission, it is withdrawn by Respondent Sevarino and may not be used as an admission by any party in any subsequent hearing, if the same becomes necessary.

32. Respondent Sevarino waives:

- (a) any further procedural steps concerning this matter,
- (b) the requirement that the Commission's decision contain a statement of findings of fact and conclusions of law, separately stated, and
- (c) all rights to seek judicial review or otherwise to challenge or contest the validity of the Order entered into pursuant to this agreement.

33. Upon Respondent Sevarino's compliance with the Order hereinafter stated, the Commission shall not initiate any further proceedings against Respondent Sevarino pertaining to the allegations specifically addressed herein.

34. This matter is dismissed regarding claims against Respondent Jason Bowsza.

35. Pursuant to Section 9-7b-56 of the Regulations of Connecticut State Agencies, a copy of this Consent Order and Stipulated Agreement shall be provided to all parties, intervenors and attorneys of record, including Complainant William Dove, and Respondents Angelo Sevarino, and Jason Bowsza.

ORDER

Based upon the above factual determinations, conclusions of law and the entire record:

IT IS HEREBY ORDERED that Respondent Angelo Sevarino shall henceforth strictly comply with General Statutes § 9-606 (a) and § 9-608 (c);

IT IS FURTHER HEREBY ORDERED that Respondent Angelo Sevarino shall pay a civil penalty in the amount of two hundred dollars (\$200) to the Commission within ten (10) days of the Commission's adoption of this Consent Order and Stipulated Agreement, and the Commission shall distribute said civil penalty to the Connecticut General Fund; and

IT IS FURTHER HEREBY ORDERED that this complaint is dismissed against Respondent Jason Bowsza.

For the Respondent:

BY: Angelo Sevarino
Angelo Sevarino
121 East Road
Broad Brook, Connecticut

For the State of Connecticut:

BY: Clare Kindall
Clare Kindall, Esq.
Interim Executive Director and
General Counsel and
Authorized Representative of the
State Elections Enforcement Commission
55 Farmington Avenue
Hartford, Connecticut

Dated: 5/15/25

Dated: 5/15/2025

Adopted this 21st day of May, 2025 at Hartford, Connecticut by vote of the Commission.

Stephen T. Penny
Stephen T. Penny, Chairman
By Order of the Commission

File No. 2024-028