



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2806

DATE FILMED 1/24/90 CAMERA NO. 3

CAMERAMAN AS

99040775352



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

29 September 1988

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE

This is a referral of the Hartford National Corporation Political Action Committee ("Federal Account") for receiving transfers totalling \$8,200 from its non-federal account ("Non-Federal Account") during calendar year 1987. As of this writing, the Federal Account has not refunded the transfers to the Non-Federal Account. According to the RAD Review and Referral Procedures for Unauthorized Committees (Standard 5), this matter requires further examination by your office.

If you have any questions on this matter, please contact Alva E. Smith at 376-2480.

Attachment :

9904077533

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 29 September 1988

ANALYST: Alva E. Smith

I. COMMITTEE: Hartford National Corporation
Political Action Committee
(C00159848)
Gregory Miller, Treasurer
(July 8, 1987 - present)
Thomas B. Fagan, Treasurer
(January 8, 1987 - July 7, 1987)
Christopher Bergstrom, Treasurer
(July 26, 1982 - January 7, 1987)
777 Main Street
Hartford, CT 06115

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Funds from a Non-Federal Account

The Hartford National Corporation Political Action Committee's ("Federal Account") 1987 Mid-Year Report disclosed a \$2,000 transfer-in from its non-federal account ("Non-Federal Account") on June 30, 1987 (Attachment 2). A Request for Additional Information ("RFAI") was sent to the Federal Account on January 20, 1988 which advised the Federal Account that the transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the Non-Federal Account (Attachment 3).

Mr. Gregory Miller, treasurer for the Federal Account, called the Reports Analysis Division ("RAD") analyst on January 29, 1988 to explain the organizational structure of the two accounts.

Mr. Miller stated that contributions were received through payroll deduction and deposited in the Non-Federal Account. The Non-Federal Account then transferred the funds to the Federal Account. The RAD analyst suggested that the

9 9 0 4 0 7 7 5 3 5 4

HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

process be reversed to alleviate any future problems and all funds received from the Non-Federal Account must be refunded. Mr. Miller explained that the Federal Account did not have sufficient funds to refund the transfer. The analyst told Mr. Miller to disclose the amount to be refunded as a debt owed to the Non-Federal Account until the total amount is refunded (Attachment 4).

A Second Notice was sent to the Federal Account on February 11, 1988 for failure to respond in writing to the RFAI (Attachment 5).

On February 12, 1988 and February 25, 1988, responses were received from the Federal Account which explained its organizational structure and noted that the transfer would be reported as a debt owed to the Non-Federal Account. The February 12 response also indicated that additional transfers-in from the Non-Federal Account would appear on the 1987 Year End Report (Attachments 6 and 7).

The Federal Account's 1987 Year End Report disclosed transfers received from the Non-Federal Account totalling \$6,200 (Attachment 8). The transfers were received between August 11, 1987 and December 8, 1987. An RFAI was sent to the Federal Account on July 27, 1988 which advised the Federal Account that the transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the Non-Federal Account (Attachment 9). A Second Notice was sent to the Federal Account on August 18, 1988 for failure to respond in writing to the RFAI (Attachment 10).

Mr. Miller called the RAD analyst on August 18, 1988 in response to the 1987 Year End RFAI. He explained that he would have responded to the RFAI sooner, but he was on vacation. He again explained the organizational structure of the two accounts and stated that the transfers would be reported as debts (Attachment 11).

On August 25, 1988, a response was received from the Federal Account stating that the funding procedure had been revised to prevent future problems and the transfers would be reported as a debt owed to the Non-Federal Account on the next report until it is paid in full (Attachment 12).

The RAD analyst called Mr. Miller on September 20, 1988 to explain that the 1987 Mid-Year, 1987 Year End, 1988 April Quarterly and 1988 July Quarterly Reports must be amended to disclose the debt owed to the Non-Federal Account (Attachment 13).

99040775355

**HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3**

As of this writing, the Federal Account has not refunded the transfers to the Non-Federal Account.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

9 9 0 4 0 7 7 5 3 5 6

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 28SEP88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
HARTFORD NATIONAL CORPORATION POLITICAL ACTION COMMITTEE				ID #C00159848 NON-PARTY QUALIFIED		
CONNECTED ORGANIZATION: HARTFORD NATIONAL CORPORATION						
1987	MISCELLANEOUS REPORT TO FEC			20JAN87	2	87FEC/454/5002
	STATEMENT OF ORGANIZATION - AMENDMENT			13JUL87	2	87FEC/473/4754
	MID-YEAR REPORT	3,735	4,250	1JAN87 -30JUN87	6	87FEC/481/2392
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN87 -30JUN87	2	88FEC/509/0920
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN87 -30JUN87	3	88FEC/510/4157
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	3	88FEC/499/3651
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	4	88FEC/509/0828
	YEAR-END	6,440	7,350	1JUL87 -31DEC87	6	88FEC/503/3791
	YEAR-END - AMENDMENT	-	-	1JUL87 -31DEC87	1	88FEC/549/0259
	REQUEST FOR ADDITIONAL INFORMATION			1JUL87 -31DEC87	3	88FEC/540/2358
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL87 -31DEC87	1	88FEC/542/4156
1988	APRIL QUARTERLY	2,500	1,500	1JAN88 -31MAR88	5	88FEC/516/2096
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN88 -31MAR88	3	88FEC/543/3242
	REQUEST FOR ADDITIONAL INFORMATION			1JAN88 -31MAR88	3	88FEC/540/2362
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN88 -31MAR88	7	88FEC/542/4149
	JULY QUARTERLY	1,830	4,600	1APR88 -30JUN88	6	88FEC/534/0185
	TOTAL	14,505	0 17,700 0		57	TOTAL PAGES

All reports have been reviewed.

End cash balance as of 6/30/88: -\$1,549

Debts owed to the committee as of 6/30/88: \$0

Debts owed by the committee as of 6/30/88: \$0

99040775357

1987 Mid-Year report

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
HARTFORD NATIONAL LWP BRITKA ACTION COMMITTEE FEDERAL

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
HARTFORD NATIONAL LWP BRITKA ACTION COMMITTEE Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > 8 2070	6/30/87	> 500
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > 8	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	2070
TOTAL This Period (last page this line number only)	3735

3 33 7 0 3 3 4 8 1 2 8 3 9 1 5



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

BQ-2

JAN 20 1988

Gregory M. Miller, Treasurer
Hartford National Corp. Political
Action Committee
777 Main Street
Hartford, CT 06115

Identification Number: C00159848

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Miller:

3 5 9
3
This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

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-Schedule A of your report discloses a receipt of \$2,000 from the Hartford National Corp. Political Action Committee (pertinent portion(s) attached). Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 20 of your next report.

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If, however, this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2400.

Sincerely,



Alva E. Smith
Reports Analyst
Reports Analysis Division

98035070830

TELECON

ANALYST: Alva E. Smith

CONVERSATION WITH: Gregory Miller (703) 722-9086

COMMITTEE: Hartford National Corp. PAC/CO0159848

DATE: 1/29/88

SUBJECT(S): Mid Year RFAI

Mr. Miller called to explain the committee's organizational structure. Contributions are received through payroll deduction and deposited in the non-federal account. The non-federal then transfers funds to the federal account. I recommended that the process be reversed. Contributions from payroll deduction should be deposited directly into the federal account and then transferred to the non-federal account. I also explained that all funds received by the federal account from the non-federal account must be refunded. Mr. Miller stated that the federal account has insufficient funds, therefore, will not be able to refund the money. I told him to disclose the amount to be refunded as a debt owed to the non-federal account until the total amount is refunded.

99040775361



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

20-3

February 11, 1988

Gregory M. Miller, Treasurer
Hartford National Corp. Political
Action Committee
777 Main Street
Hartford, CT 06115

Identification Number: C00159848

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Miller:

This letter is to inform you that as of February 10, 1988, the Commission has not received your response to our request for additional information, dated January 20, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Aiva E. Smith on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

987040758342

Connecticut National Bank

08 FEB 12 AM 10:35

777 Main Street
Hartford, Connecticut 06115

In Reply Please Address
Investment Services
Research Department

February 8, 1988

Alva E. Smith
Federal Elections Commission
999 E. St., N.W.
Washington, D.C. 20463

Dear Mr. Smith:

I am writing in response to your 1/20/88 letter and to clarify our telephone conversation 1/29/88.

Regarding the receipt (6/30/87) that you questioned: That was a transfer from our State PAC to our Federal PAC. We receive payroll deductions from our employees which are deposited into our State PAC. We in turn fund our Federal PAC primarily from the State PAC. You will see more of these receipts on our year-end report which was mailed prior to receiving your letter.

I understand we have two alternatives going forward. We can fund our State PAC through our Federal PAC (subject to State regulation), or we can register our State PAC as a collecting agent for the Federal PAC. I understand in either case the Federal PAC must return the funds to the State PAC. Since we do not have the funds available to the Federal PAC now, we will report the transfers as debt owed.

Thank you for your assistance.

Sincerely,

Gregory M. Miller
Treasurer
Hartford National Corp.
Federal PAC

08035090920

FEL:PAI:1:1

88 FEB 25 11:03

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

In Reply Please Address
Investment Services
Research Department

February 18, 1988

Mr. John D. Gibson
Assistant Staff Director
Federal Elections Commission
999 E. Street N.W.
Washington, DC 20463

Dear Mr. Gibson:

As the enclosed letter indicates, I have responded to your 1/20/88 request for information. In addition, I should point out I spoke with Alva Smith several times on 1/29/88, the day I received her letter.

During our conversation, Alva indicated my communications were sufficient. If any additional information is required, I will provide it as soon as possible.

Sincerely,

Gregory M. Miller
Gregory M. Miller
Treasurer

9 8 9 3 0 17 07 451 35 67 4

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

In Reply, Please Address
Investment Services
Research Department

February 8, 1988

Alva E. Smith
Federal Elections Commission
999 E. St., N.W.
Washington, D.C. 20463

Dear Ms. Smith:

I am writing in response to your 1/20/88 letter and to clarify our telephone conversation 1/29/88.

Regarding the receipt (6/30/87) that you questioned: That was a transfer from our State PAC to our Federal PAC. We receive payroll deductions from our employees which are deposited into our State PAC. We in turn fund our Federal PAC primarily from the State PAC. You will see more of these receipts on our year-end report which was mailed prior to receiving your letter.

I understand we have two alternatives going forward. We can fund our State PAC through our Federal PAC (subject to State regulation), or we can register our State PAC as a collecting agent for the Federal PAC. I understand in either case the Federal PAC must return the funds to the State PAC. Since we do not have the funds available to the Federal PAC now, we will report the transfers as debt owed.

Thank you for your assistance.

Sincerely,

Gregory M. Miller
Treasurer
Hartford National Corp.
Federal PAC

9 9 9 A 3 7 1 0 5 4 3 1 6 5 3

UNITED RECEIPTS

87 Year End report

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE OF
FOR LINE NUMBER

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Attachment 8

HARTFORD NATIONAL CORP. P.A.C.

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
HARTFORD NATIONAL CORP STATE P.A.C.		8/1/87 8/17/87 9/29/87 12/8/87	1000 1000 700 3500
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
		8200	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
JAMES STEANE	CONNECTICUT NAT'L BANK	11/5/87	240
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
	BANKER	240	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
SUBTOTAL of Receipts This Page (optional)			6440
TOTAL This Period (last page this line number only)			6440

090407136



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JUL 27 1988

Gregory Miller, Treasurer
Hartford National Corporation
Political Action Committee
777 Main Street
Hartford, CT 06115

Identification Number: C00159848

Reference: Year End Report (7/1/87-12/31/87)

Dear Mr. Miller:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt of \$6,200 from the Hartford National Corporation State PAC (pertinent portion(s) attached). Please clarify whether this transfer is from an account maintained by your committee for non-federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 20 of your next report.

If, however, this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

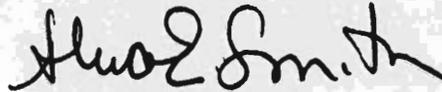
Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

99040715367

-Your report discloses a negative ending cash balance of \$584.36. This suggests that you have either overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please show a zero balance on Line 8 of the Summary Page and reflect the amount and the nature of the debt on Schedule D and Line 10. 2 U.S.C. §434(b)(8).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Alva E. Smith
Reports Analyst
Reports Analysis Division

99040715358



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

August 18, 1988

Gregory Miller, Treasurer
Hartford National Corporation
Political Action Committee
777 Main Street
Hartford, CT 06115

Identification Number: C00159848

Reference: Year End (7/1/87-12/31/87) and April Quarterly
(1/1/88-3/31/88) Reports

Dear Mr. Miller:

This letter is to inform you that as of August 17, 1988, the Commission has not received your response to our requests for additional information dated July 27, 1988. Those notices requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). Copies of our original requests are enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Alva E. Smith on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

99040715369

TELECON

ANALYST: Alva E. Smith
CONVERSATION WITH: Gregory Miller
COMMITTEE: Hartford National Corp. PAC
DATE: August 18, 1988
SUBJECT(S): Year End RFAI

Mr. Miller explained that he would have repoded to the RFAI sooner, but he was on vacation when the RFAI arrived. He once again explained that contributions through payroll deduction were deposited directly into its non-federal account then transferred to the federal account. Additionally, he stated that the transfers will be reported by the federal account as a debt owed to the non-federal account. Mr. Miller then explained that the cash discrepancies were discovered during an internal review. They were caused by deposits that were not accounted for and an adjusting entry. A written response is forthcoming.

990407 / 5370

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

ORIGINAL CHECK DEPOSITED
DATE 8/25/88
AMOUNT \$10,000.00

Gregory M. Miller
Investment Officer

August 22, 1988

Mr. John D. Gibson
Assistant Staff Director
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Identification Number: C00159848

Dear Mr. Gibson:

Enclosed is a copy of my reply to Alva Smith which I mailed August 19, 1988. I regret the delay, but as I explained to Alva, her inquiry arrived when I was on vacation.

Based upon my conversations with Alva, I trust these responses will be sufficient. In addition, we have revised our funding procedure to prevent this confusion from recurring.

Sincerely,

Gregory M. Miller
Gregory M. Miller

GMM/ja
Attachment

8903343242

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

Gregory M. Miller
Investment Officer

August 19, 1988

Ms. Alva Smith
Reports Analyst
Federal Elections Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Ms. Smith:

I have prepared this letter in response to your July 27th letters.

The receipts from the Hartford National Corporation State PAC were transfers from our State PAC maintained for non-federal activity. As I explained August 18th, we had deposited payroll deductions directly into our State PAC and then funded our Federal PAC as needed by writing checks from our State account. These transfers will be reported as debts on our next filing and will be paid back to the State PAC as our cash flow allows.

In the future, we will deposit payroll deductions into our Federal PAC and fund our State PAC through it as needed.

As we also discussed, the negative ending cash balance on our year-end report disappeared immediately after year-end with subsequent deposits.

Lastly, the discrepancy between the beginning balance in the April Quarterly Report and the ending balance in our 1987 Year End Report is due to an adjusting entry. Following an internal review, we discovered a discrepancy between the filings and the checkbook numbers. It appears this arose before 1985 and to bring the two back in line we made an adjusting entry.

I trust these answers adequately respond to your questions and our revised funding procedure will prevent these concerns in the future.

Sincerely,

Gregory M. Miller
Gregory M. Miller

GMM/ja

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88035433243

TELECON

ANALYST: Alva E. Smith

CONVERSATION WITH: Gregory Miller

COMMITTEE: Hartford National Corp. PAC/C00159848

DATE: 9/20/88

SUBJECT(S): Debts owed to the non-federal account

I called Mr. Miller to inform him that he failed to disclose the debts owed to the non-federal account. He explained that he intends to disclose the debt on the October Quarterly Report. He was under the impression that he only had to disclose the debt on the October Quarterly. I explained that the Mid Year, Year End, April Quarterly, and July Quarterly reports must be amended to disclose the debt owed to the non-federal account. He requested forms and will amend the reports as soon as possible. I sent the forms this day.

99040775373

08 DEC 15 AM 9:55

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD Referral #88L-23
Staff: Sandra Dunham

EXECUTIVE SESSION

JAN 10 1989

SOURCE OF MUR: **INTERNALLY GENERATED**

RESPONDENTS: Hartford National Corporation Political
Action Committee and Gregory Miller,
as treasurer

RELEVANT STATUTES: 11 C.F.R. § 102.5(a)(1)
11 C.F.R. § 102.5(a)(2)

INTERNAL REPORTS
CHECKED: C Index

FEDERAL AGENCIES
CHECKED: None

I. GENERATION OF MATTER

The Hartford National Corporation Political Action Committee (the "Committee") and Gregory Miller, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for accepting transfers totalling \$9,200^{1/} from its non-federal account. The funds which comprised the non-federal account were received through payroll deduction.

II. FACTUAL AND LEGAL ANALYSIS

Pursuant to 11 C.F.R. § 102.5(a)(1), an organization which finances political activity in connection with both federal and non-federal elections must keep its federal and non-federal accounts strictly segregated in separate accounts. Only funds subject to the prohibitions and limitations of the Act should be

^{1/} The referral identifies transfers totalling \$8,200 during the 1987 calendar year. It also references an additional \$1,000 transfer disclosed in the 1988 April Quarterly.

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deposited into the federal account and no transfers can be made into the federal account from any non-federal account of the organization. The Committee set up two separate accounts for its election activities pursuant to section 102.5(a)(1). However, the monies from payroll deduction were all placed in the non-federal account. The Committee then transferred funds from the non-federal account to the federal account as needed, according to Mr. Miller. Even though the Committee has amended its reports to reflect a debt owed to the non-federal account from its federal account, the Committee made numerous transfers from its non-federal to its federal account during 1987 and in the beginning of 1988.

Pursuant to 11 C.F.R. § 102.5(a)(2), only contributions designated for the federal account; contributions solicited in connection with a federal election; and contributions from contributors who were informed that all contributions are subject to the prohibitions and limitations of the Act, may be deposited in a federal account. Because the monies from the payroll deduction plan were all placed in the non-federal account, it appears that the individuals who contributed under the plan may not have been notified that the funds were being solicited in connection with a federal election or that their contributions were subject to the prohibitions and limitations of the Act.

Accordingly, this Office recommends that the Commission open a MUR, find reason to believe that the Committee violated

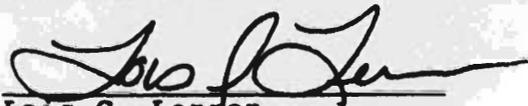
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11 C.F.R. § 102.5(a) and approve the attached letter, questions and Factual and Legal Analysis.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that the Hartford National Corporation Political Action Committee and Gregory Miller, as treasurer violated 11 C.F.R. § 102.5(a).
3. Approve the attached letters, questions and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

12-13-88
Date

Attachments

1. Referral Materials
2. Proposed Letter and Factual and Legal Analysis
3. Questions

Staff Person: Sandra Dunham

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN
COMMISSION SECRETARY *JM*

DATE: DECEMBER 20, 1988

SUBJECT: OBJECTION TO RAD Ref. 88L-23: FIRST G.C. REPORT
SIGNED DECEMBER 13, 1988

The above-captioned document was circulated to the Commission on Thursday, December 15, 1988 at 4:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____ X _____

This matter will be placed on the meeting agenda for January 10, 1988.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hartford National Corporation) RAD Referral #88L-23
Political Action Committee and)
Gregory Miller, as treasurer)

(MUR
2806)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 11, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to the above-captioned referral:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that the Hartford National Corporation Political Action Committee and Gregory Miller, as treasurer, violated 11 C.F.R. § 102.5(a).
3. Approve the letters, questions and Factual and Legal Analysis attached to the General Counsel's report dated December 13, 1988, subject to revision of questions 2 and 4 as agreed during the meeting discussion.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

Jan. 13, 1989
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 31, 1989

Gregory Miller, Treasurer
Hartford National Corporation
Political Action Committee
777 Main Street
Hartford, Connecticut 06115

RE: MUR 2806
Hartford National Corporation
and Gregory Miller, as treasurer

Dear Mr. Miller:

On January 11, 1989, the Federal Election Commission found that there is reason to believe the Hartford National Corporation Political Action Committee ("Committee") and you, as treasurer, violated 11 C.F.R. § 102.5(a). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Gregory Miller
Page 2

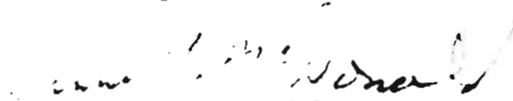
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

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Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

Linda J. Kelly
Deputy General Counsel

February 16, 1989

Ms. Sandra J. Dunham
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Dear Ms. Dunham:

I am Deputy General Counsel of Connecticut National Bank, Hartford National Corporation's principal bank subsidiary. This letter is to confirm our telephone discussion whereby I requested a two week extension to the time for the Hartford National Corporation Political Action Committee and Gregory Miller, Treasurer, to respond to the Interrogatories and Request for Production of Documents.

As I mentioned earlier, all of the documentation necessary to present a complete response has not been as readily available as anticipated. For this reason, we would appreciate your agreement to extend the time for response until March 3, 1989.

Thank you for your consideration.

Sincerely,



LJK:pb

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 23, 1989

Linda J. Kelly, Esquire
Connecticut National Bank
777 Main Street
Hartford, Connecticut 06115

RE: MUR 2806
Hartford National Corporation
Political Action Committee and
Gregory Miller, as treasurer

Dear Ms. Kelly:

This is in response to your letter dated February 16, 1989, which we received on February 17, 1989, requesting an extension until March 3, 1989 to respond to the Commission's reason to believe finding. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 3, 1989.

If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION

MANATT, PHELPS, ROTHENBERG & PHILLIPS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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MWR 2806

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036
TELEPHONE (202) 462-4300

LOS ANGELES
11266 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90024
(213) 342-4000

February 28, 1989

Sandy Dunham
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Hartford National Corporation

Dear Ms. Dunham:

As you discussed with my secretary (Stephanie Brown) yesterday, please find enclosed the Designation of Counsel statement.

Inasmuch as we have just been retained in this matter, and we are presently engaged in a Congressional hearing that is projected to last through the next two weeks and will require all of our time during that period, we are hereby requesting an additional two week extension of time to respond to the above-captioned matter.

Should you wish to discuss this request, please feel free to call me. Thank you very much for your consideration.

Sincerely,

Eric F. Kleinfeld
Manatt, Phelps, Rothenberg
& Phillips

Enclosure

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STATEMENT OF DESIGNATION OF COUNSEL

MJR 2806

NAME OF COUNSEL: William C. Oldaker, Esq.
Eric F. Kleinfeld, Esq.

ADDRESS: Manatt, Phelps, Rothenberg & Evans
1200 New Hampshire Avenue, N.W., Suite 200
Washington, D.C. 20036

TELEPHONE: (202) 463-4300

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

2/24/89
Date

By: Gregory M. Miller
Gregory Miller, Treasurer

RESPONDENT'S NAME: HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE and
GREGORY MILLER as Treasurer

ADDRESS: 777 Main Street
Hartford, CT 06115

TELEPHONE: (203) 728-2000

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plm



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

March 1, 1989

Eric F. Kleinfeld, Esquire
Manatt, Phelps, Rothenberg & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, D.c. 20036

RE: MUR 2806
Hartford National Corporation
Political Action Committee

Dear Mr. Kleinfeld:

This is in response to your letter dated February 28, 1989, which we received on February 28, requesting an additional extension of 14 days to respond to the Commission's finding of reason to believe. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 17, 1989.

If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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MANATT, PHELPS, ROTHENBERG & PHILLIPS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

LOS ANGELES

1388 WEST OLYMPIC BOULEVARD

LOS ANGELES, CALIFORNIA 90064

(213) 318-6000

MAR 17 11:59

March 17, 1989

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2806

Dear Mr. Noble:

Enclosed please find the response of the Hartford National Corporation Political Action Committee and Gregory Miller, as Treasurer, to the Commission's reason to believe determination in MUR 2806. Attached to that response are the answers to interrogatories, as well as the documents, requested by the Commission.

Should you have any questions, or desire any additional information, please feel free to contact me.

Sincerely,

Eric F. Kleinfeld
Manatt, Phelps, Rothenberg and
Phillips

Enclosure

99040775380

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF)

Hartford National Corporation)
Political Action Committee)
Gregory Miller, as Treasurer)

MUR 2806

RESPONSE

A. Introduction

This constitutes the response of the Hartford National Corporation ("Hartford") Political Action Committee ("Committee") and Gregory Miller, as Treasurer, to the Federal Election Commission's ("FEC") letter, request for interrogatories, and production of documents, received by the Committee on February 3, 1989. According to that letter, the FEC has found reason to believe that the Committee may have violated 11 CFR §102.5(a) of the FEC's regulations. No violation of the Federal Election Campaign Act of 1971, as amended, ("Act") 2 U.S.C. §431 et seq., has been cited.

A reading of the General Counsel's Factual and Legal Analysis leaves the Committee unclear as to the basis of the alleged violation, that is, whether the transfer of funds from a non-federal account to a federal account is the purported violation, or whether the supposed failure to inform individual contributors is the basis of the violation. Set forth below, the Committee will respond to both circumstances and in doing so, respectfully

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requests that the FEC take no further action against the Committee and Gregory Miller, as Treasurer, and close this matter.

B. Discussion

1. Section 102.5(a) of the FEC's regulations is inapplicable to the Committee's activities.

a. The Committee is not the type of organization contemplated by §102.5(a).

The FEC relies on section 102.5(a) of its regulations as the basis of this MUR. That section expressly applies to "[o]rganizations that are political committees under the Act," and provides at section 102.5(a):

(1) Each organization, including a party committee, which finances political activity in connection with both federal and non-federal elections and which qualifies as a political committee under 11 CFR 100.5 ...

Based on the express language of section 102.5(a)(1), that regulation would not apply to the Committee in this matter. The Committee is specifically not an organization "which finances political activity in connection with both federal and non-federal elections." The Committee finances political activity solely in connection with federal elections. The Committee makes no contributions or expenditures in connection with non-federal elections.

b. Hartford is not the type of organization contemplated by §102.5(b).

It is true, however, that the Committee's connected organization, the Hartford National Corporation, does "finance"

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non-federal elections. However, this activity is not undertaken through its separate segregated fund, the Committee. All non-federal activity is conducted directly by Hartford through a separate and distinct account. For purposes of section 102.5, this non-federal account was not established and is not maintained by the Committee; it is under Hartford's oversight directly.

Hartford's political activity is not of the type contemplated by section 102.5(a). Section 102.5(a), by its very language, contemplates the establishment of two separate accounts by an already registered "federal political committee." It applies to political committees under the Act. Where, as here, the organization is not a political committee under the Act, section 102.5(a) is inapplicable. Hartford National Corporation is not a political committee under the Act.

2. Section 102.5(b) of the FEC's regulations is applicable to Hartford's activities.

- a. Hartford is not a political committee and may make a showing using reasonable accounting.

Section 102.5(b) applies to those "[o]rganizations that are not political committees under the Act." Hartford National Corporation, as a connected organization, is such an organization. Section 102.5(b) provides, in part:

(1) Any organization that makes contributions or expenditures but does not qualify as a political committee under 11 CFR 100.5 and any State or local party organization that makes contributions, expenditures and exempted payments under 11 CFR 100.7(b)(9), (15) and (17) and 100.8(b)(10), (16) and (18) shall ...

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(ii) Demonstrate, through a reasonable accounting method that whenever such organization makes a contribution, expenditure or exempted payments, that organization has received sufficient funds subject to the limitations and prohibitions of the Act to make such contribution, expenditure or payment. Such organization shall keep records of amounts received or expended under this subsection ...

Thus, under section 102.5(b), an organization may establish that when contributions or expenditures are made in connection with a federal election, sufficient funds are available for that purpose which are subject to the limitations and prohibitions of the Act. The Committee will demonstrate below that this is precisely the case in this matter.

b. All transfers from Hartford's non-federal account were comprised of individual contributions permitted under the Act.

The Reports Analysis Division ("RAD") of the FEC has questioned six transfers made by Hartford's non-federal account to the Committee. Five of those transfers occurred in 1987, and one in 1988, as set forth below:

<u>Date</u>	<u>Transfer</u>
6/30/87	\$2,000
8/11/87	\$1,000
8/17/87	\$1,000
9/29/87	\$700
12/8/87	\$3,500
1/19/88	\$1,000

The monies transferred were used by the Committee in connection with federal elections. In all cases, the transfers were comprised

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solely of funds subject to the limitations and prohibitions of the Act. No funds were ever transferred from Hartford's non-federal account to the Committee from prohibited sources or in excess of the Act's limitations.

In fact, all funds transferred were comprised solely of payroll deductions from Hartford employees. Thus, all were individual contributions. Moreover, the payroll deduction plan implemented by Hartford deducts only very small sums from the individual employee paychecks, typically, five to ten dollars, on average.^{1/} At the time of the transfers, none of the employees was close to reaching their maximum contribution limitation under the Act.

The chart which follows shows the aggregate amount of the payroll deposits which were in Hartford's non-federal account at the time of each transfer.

<u>Date</u>	<u>Transfer</u>	<u>Date</u>	<u>Payroll Deposit</u>	<u>Cumulative^{2/} Excess</u>
6/30/87	\$2,000	6/2/87	\$2,044.08	\$ 44.08
8/11/87	\$1,000	8/4/87	\$2,030.08	\$1,074.16
8/17/87	\$1,000	9/2/87	\$1,964.08	\$2,038.24
9/29/87	\$ 700	12/2/87	\$1,894.08	\$3,232.32
12/8/87	\$3,500	11/3/87	\$1,896.08	\$1,628.40
1/19/88	\$1,000	1/11/88	\$2,026.08	\$2,654.48

^{1/} The aggregate employee contribution on an average yearly basis is \$125.

^{2/} This column constitutes the amount by which each payroll deposit exceeds each transfer, on an accrued basis.

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Thus, for example, on June 2, 1987, payroll deductions totalling \$2,044 were deposited in Hartford's non-federal account, and on June 30, 1987, \$2,000 of this money was transferred to the Committee.^{3/} Attached to this Response are the deposit slips for these aggregate payroll deductions, as well as computer printouts generated by Hartford's payroll department setting forth the individual contributors and the amounts of their contributions which comprised the deposits and then the subsequent transfers into the Committee's account. It is clear that none of these employees had reached their maximum federal contribution limit at the time of these payroll deductions or at the time of the transfers to the Committee.

Accordingly, then, all the monies transferred complied with the limitations and prohibitions of the Act, as well as the provisions of 11 CFR §102.5(b). The Committee received no funds from Hartford's non-federal account, other than the payroll deductions.^{4/}

^{3/} Only one deposit was insufficient, in an of itself, to cover the transfer made, that of December 8, 1987. However, the "cumulative excess" column clearly demonstrates that sufficient funds remained from the proceeding deposits to cover the entirety of the \$3,500 transfer.

^{4/} Additionally, section 102.5(a), which mandates that "only funds subject to the prohibitions and limitations of the Act shall be deposited in such separate federal account," is satisfied by this showing.

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3. If the FEC should determine that §102.5(a) applies to the Committee's activities, all employees of Hartford were aware that their payroll deductions might be used in connection with federal elections.

While it is not a requirement of section 102.5(b), should the FEC determine that section 102.5(a) is nevertheless applicable, it should be pointed out that all employees were aware that their payroll deductions might be used for federal purposes. Employees were notified of this through both written communications, specifically by letters and, for senior officers, by word-of-mouth explanations of Hartford's political activities.^{5/} Attached to this Response are several letters which refer to the corporation's involvement in the federal legislative process and their assistance to federal candidates. Also attached is a page from a past newsletter which refers to contributions made on behalf of federal candidates. Contributors were made aware through these communications and verbally that their contributions were being used for federal purposes.

C. Conclusion

For the following reasons, the Committee respectfully requests that the FEC take no further action in this matter. First, the General Counsel's reliance on §102.5(a) is misplaced; the applicable portion of the regulation is section 102.5(b). Second, under section 102.5(b), Hartford has demonstrated that its non-federal account had sufficient funds permissible under the

^{5/} Additionally, any employee who requested information on federal political activity would be so informed.

prohibitions and limitations of the Act, to make all of the transfers to the Committee. Third, even should the FEC determine that section 102.5(a) is applicable, the composition of the transfers as funds permissible under the Act, should mandate no further action. Since all funds could have been directly deposited into the Committee and then disbursed, no harm has occurred. Fourth, Hartford has changed its procedure to ensure that all contributions for federal purposes will be deposited into the Committee's account. Finally, Hartford's employees who participated in the payroll deduction plan were aware of the company's activities at the federal level.

Hartford believes that these reasons compel no further action in this MUR and urges the FEC to close its file. However, as available under FEC procedures, should the FEC disagree with the reasoning contained herein and decide not to close this matter, the Committee respectfully requests the opportunity to conciliate this matter prior to a determination of probable cause.

Dated: 3/17/89

Respectfully submitted,



William C. Oldaker
Eric F. Kleinfeld
MANATT, PHELPS,
ROTHENBERG & PHILLIPS
Suite 200
1200 New Hampshire Ave., N.W.
Washington, DC 20036
(202) 463-4300

Attachments

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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS	10.00	60.00
00	005	0564	B M CHESTER		15.00
00	024	9121	L P BEAUDOIN	2.00	12.00
00	030	4777	D W VALENTINE	4.00	24.00
00	052	3941	G M GENDREAU		7.50
00	055	0562	R S CROSS	3.00	6.00
00	072	3062	R K OVALLE	5.00	30.00
00	090	4754	T E FLANNERY		50.00
00	090	3978	J Q MILLS	1.00	6.00
00	090	5924	G E RUSSELL JR	25.00	125.00
00	090	4157	N M FALLS	6.25	31.25
00	091	8572	A L KNICELY	30.00	60.00
00	094	9512	J W LUX JR	2.00	4.00
00	101	1654	H M ZERFING II	1.25	7.50
00	109	1601	K A POLLACK	1.25	7.50
00	112	6749	E P BARBER		25.00
00	114	9637	B L ZEBROWSKI	1.00	6.00
00	115	6842	J J CONLON JR	2.50	15.00
00	124	0464	J D TENNEY		6.00
00	126	5261	D J MUDRY	.50	3.00
00	141	2940	D GRAY	2.00	12.00
00	146	0913	J K SNEAD	1.25	7.50
00	160	3715	C A DELUCIA	3.00	18.00
00	164	5207	J M CONTI	2.50	15.00
00	165	4764	P J BASILE	8.00	48.00

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777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	166	9042	S L BIERNAT	4.00	4.00
00	169	9662	B FREIMUTH	3.00	18.00
00	192	9349	V B TIERNEY	1.50	9.00
00	202	4842	J J FULLANA	5.00	30.00
00	205	9679	F G CARTER		15.00
00	205	0642	J B DAYTON	5.00	30.00
00	205	5515	E F SHUGRUE	3.50	21.00
00	206	6791	C A HAYES	5.00	30.00
00	206	7960	L C DRAGOLI	2.50	15.00
00	208	6952	P J DENZA	5.00	20.00
00	210	4319	C MCCARTHY	2.00	12.00
00	210	7230	G G HORN	5.00	30.00
00	213	8813	N E FITZPATRICK JR	5.00	10.00
00	215	2294	S M BATES	10.00	20.00
00	226	1685	M C PARTINGTON	5.00	10.00
00	227	4834	R H GLODE	5.00	30.00
00	227	2865	J A BEIR	5.00	30.00
00	233	6953	G J MEEHAN	10.00	10.00
00	510	7583	J G FORTSCH	2.50	11.68
00	535	4410	M S CAVANAUGH	5.00	30.00
00	536	2522	B F VIVERITO	25.00	150.00
00	537	1747	M D FELLION	6.00	32.00
00	537	8267	J J BALD	5.00	30.00
00	540	1817	J F ASPINWALL	5.00	30.00
00	540	0734	J P RAFFERTY	5.00	10.00

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PAC REPORT

RUN TIME 16:46:54
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	560	6136	J BODE	7.50	35.00
00	561	3715	P PIRROTTA	10.00	60.00
00	580	5327	B M BUDNICK	10.00	60.00
00	585	0464	J A WILDER	1.25	7.50
00	585	4618	S G NYSTROM	20.00	120.00
00	595	6671	D HEARD III	15.00	70.00
01	001	9802	J R BERGER	25.00	150.00
01	005	4573	D L RUDBERG	1.50	9.00
01	005	1144	T D CRONEN	8.50	51.00
01	005	3791	M R MILLER	6.67	40.02
01	010	0509	R E GALIPO	20.00	120.00
01	010	7511	D DIX JR	10.00	60.00
01	010	0041	R G CHRISTENSEN	10.00	60.00
01	020	6566	S P ARONSON		10.00
01	025	0612	J A DIGEL	3.00	18.00
01	025	8370	T E MCKINLAY	2.00	12.00
01	025	5820	J M RICHARDSON	20.00	60.00
01	025	5775	R P ENGVALL JR	4.00	24.00
01	025	5211	C N GIANOPULOS	2.00	2.00
01	030	3264	L A DUNLAP JR	10.00	60.00
01	030	7249	P J SPOSITO	10.00	40.00
01	030	9364	E C KERIN	2.00	4.00
01	035	1404	R L COLE	10.00	60.00
01	035	9559	J W BEVIVINO	2.00	12.00
01	035	6759	M D GALVIN	8.50	37.00

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PAC REPORT

RUN TIME 16:46:54
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	035	9434	S C HOLAHAN	5.00	30.00
01	035	5752	B W MCCOLLUM	5.00	30.00
01	070	8387	J F SAVAGE III	20.00	120.00
01	080	1382	M C KRAMER	5.00	10.00
01	100	5632	W B SOPER II	35.00	185.00
01	150	5486	E G CHIARAMONTE	40.00	240.00
01	150	8291	R ABEL JR	35.00	210.00
01	150	8967	J M BIXLER	15.00	65.00
01	249	3499	N S ABEL	2.50	15.00
01	250	9985	D W GRIGLEY	20.00	120.00
01	250	0074	W P SOKOLOSKY	2.00	12.00
01	590	2820	J F MORKAN JR	5.00	30.00
01	590	9289	R G TRUB	25.00	150.00
01	595	2159	C J ZIRUK	5.00	26.68
01	600	0951	M S WALLACE	8.33	44.66
01	600	8324	S G OGDEN	7.50	45.00
01	600	6266	R G COLEGROVE	5.00	30.00
01	750	7722	J R DUNN	30.00	180.00
01	751	3342	M SYDORIAK JR	6.00	36.00
01	751	3093	J F ABATE	5.00	30.00
01	751	6166	P TENNEY	5.00	10.00
01	751	7419	J A QUIGLEY	7.00	42.00
01	980	1783	M B MESKILL	20.00	120.00
01	980	6898	S VAN BATENBURG	5.00	30.00
01	989	0823	M G ROOT	5.00	30.00

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PAC REPORT

RUN TIME 16:46:54
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	998	0558	D BOYD	6.00	36.00
02	001	0406	J J CAROSELLA	10.00	60.00
02	001	8726	A J CICCHETTI	10.00	60.00
02	002	7859	J F BLAKE	10.00	60.00
02	008	1533	W L HARRINGTON JR	5.00	42.00
02	011	1288	J J SPEAR	10.00	44.00
02	020	8907	T B FAGAN	10.00	60.00
02	030	5089	F T PLEVA	5.00	30.00
02	511	3454	M E MCGUINNESS	4.00	24.00
02	511	0905	W O WARREN	3.00	18.00
02	528	3588	P J MCDEVITT JR	20.83	124.98
02	535	1806	P A FUDGE	2.50	15.00
02	565	4280	P HOMES	2.00	12.00
02	569	4699	P H POGGI	3.75	13.75
02	569	7791	K S DUBE	3.00	3.00
02	569	9766	R BERRY	6.00	12.00
02	575	6714	R A GUENTER	60.00	320.00
02	740	5631	R F LUX	2.00	12.00
02	830	1333	M E MARKS	15.00	70.00
02	832	3353	D CAREY	3.00	18.00
03	002	4361	R R FOSTER	25.00	150.00
03	010	1105	R J RANELLI	20.00	40.00
03	010	1004	R F POUND JR	20.00	120.00
03	025	2297	J A HINCKLEY	5.00	30.00
03	040	3929	C L HANNAH	1.00	6.00

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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	080	7524	S A WESTALL	12.00	72.00
03	080	8835	S R WALKER	25.00	50.00
03	080	1704	J W ROSTON	20.00	120.00
03	115	7326	K T PELLETIER	4.00	8.00
03	115	8471	C C MANLEY	3.00	18.00
03	115	8721	J A GOODFELLOW	2.00	12.00
03	125	5751	G M BROPHY	6.00	36.00
03	144	5893	S I AUCOIN	1.25	2.50
03	162	3994	J C REED	2.00	12.00
03	215	5033	R J WERNLE	2.50	5.00
03	228	5838	A S ALUSKA	2.00	12.00
03	228	7105	D E MATTHEWS	5.00	30.00
03	228	5807	M P DANBRISI	5.00	30.00
03	248	4053	B F DIDAN	3.00	6.00
03	260	6268	F A BROWN	2.00	12.00
03	410	3560	G L DUROST	20.00	120.00
03	410	5192	J W SULLIVAN	10.00	20.00
03	440	5138	R L ST PIERRE	2.00	12.00
03	460	2238	M A KOENIG	2.50	15.00
03	701	1630	M P ARIAS	5.00	30.00
03	752	9995	Z M CHAMBERS		20.00
04	010	0509	F A LARSON	30.00	160.00
04	020	2635	A P BOECKLIN	10.00	20.00
04	030	3226	J P CARLEY	20.00	74.00
04	045	7141	J J MILLER	6.00	36.00

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CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
04	060	0074	J FISKE JR	5.00	30.00
04	080	5927	M E DEVINE ✓	8.00	48.00
04	090	1525	S L REYNOLDS	5.00	26.00
04	100	8197	R L AUGUST	3.00	18.00
04	105	4661	A M AUBURN ✓		60.00
04	125	0015	M M HOPKINS ✓	1.00	6.00
04	125	2894	B R CALDER	6.25	37.50
04	126	5221	M PRIOR ✓	3.00	6.00
04	126	2744	L HAMILTON	1.00	6.00
04	130	4591	J L DELUCIA JR ✓	10.00	40.00
04	130	2974	M R LARENSEN JR ✓	5.00	22.00
04	130	1387	M H VALLERA ✓	.50	3.00
04	160	2662	P R TRACEY ✓	9.00	54.00
04	160	5150	G P AHRENS ✓	5.00	30.00
04	160	4439	G W BISHOP ✓	1.50	9.00
04	165	6011	N J CURRIE ✓	10.00	60.00
04	165	6153	B J CUNNINGHAM ✓	8.00	16.00
04	175	0832	A R JANN	7.50	45.00
04	190	3883	J R HESS ✓	5.00	30.00
04	190	1548	S A VEIT		7.50
04	230	2572	N R BOUCHARD ✓	20.00	80.00
04	230	8368	M L BISCARDI	10.00	20.00
05	830	9179	D M THORNEY ✓	1.25	7.50
05	880	9190	J M HENDRICKSON	5.00	30.00
05	880	9886	J A KELLER	5.00	30.00

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CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	810	6779	P M DROUIN	8.00	48.00
05	820	3375	R S KOLLMEYER	2.50	15.00
05	820	1549	M Q MCNAMARA	2.50	13.00
06	088	4419	W E KILPATRICK	.75	4.50
06	088	4356	G J MURPHY	4.00	24.00
06	088	0385	J H HARRIGAN	10.00	60.00
06	088	7507	R J DEMAYO	10.00	60.00
06	210	0138	R J DALLAI	5.00	30.00
06	210	0317	K L SCHLEGEL	5.00	30.00
06	225	4266	T CAHILL	30.00	180.00
06	238	2845	W E LOFGREN	20.00	40.00
06	248	7446	A J CAMPANELLI	40.00	240.00
06	250	1390	S M PROTO	5.00	30.00
06	250	1916	R F NOTASKY	3.50	21.00
06	250	2293	C O STRAUB	10.00	60.00
06	250	6613	R L EIGLER	5.00	10.00
06	342	1415	D R MAROTTO	5.00	30.00
06	342	7548	J P CANTIN	2.50	5.00
06	568	5279	S T INGALLS SR	2.50	15.00
06	568	2825	D F KANDOFF	5.00	30.00
06	563	5161	M G KEELEY	5.00	10.00
06	563	9676	D A HURLEY		15.00
06	563	4854	N D LEBRUN	1.25	7.50
06	564	0321	R E DELL	5.00	30.00
06	728	8733	J A YOUNG	30.00	30.00

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CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	325	7139	J D CASALE	5.00	30.00
08	325	7683	T W EGAN	1.50	9.00

COMPANY TOTALS

6.50 39.00

9 9 0 4 0 7 1 5 4 0 5

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RHODE ISLAND NATIONAL BANK
SUITE 400 30 KENNEDY PLAZA PROVIDENCE RI 02903

BR	DEPT	EMPLS	NAME	CURR.PAC	YTD PAC
08	599	8108	D F MALL	30.00	180.00
COMPANY TOTALS				30.00	180.00

0 9 0 4 0 7 7 5 4 0 6

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CONNECTICUT NATIONAL TRUST COMPANY OF FLORIDA
725 COLORADO AVE STUART FL 33495-2317

PAC REPORT

BR	DEPT	EMPLS	NAME	CURR.PAC	YTD PAC
08	400	7797	R L RICE		12.48

COMPANY TOTALS

12.48

0 9 0 4 0 7 7 5 4 0 7

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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS	10.00	80.00
00	005	0564	B M CHESTER		15.00
00	024	9121	L P BEAUDOIN	2.00	16.00
00	030	4777	D W VALENTINE	4.00	32.00
00	039	5287	J M CONTI	2.50	20.00
00	047	9637	B L ZEBROWSKI	1.00	8.00
00	052	3941	G M GENDREAU		7.50
00	055	0542	R S CROSS	3.00	12.00
00	072	3862	R K OVALLE	5.00	40.00
00	090	4754	T E FLANNERY		50.00
00	090	3978	J Q MILLS	1.00	8.00
00	090	4157	N M FALLS	6.25	43.75
00	091	0572	A L KNICELY	30.00	120.00
00	094	9512	J M LUX JR	2.00	8.00
00	101	1654	H M ZERFING II	1.25	10.00
00	109	1481	K A POLLACK	1.25	10.00
00	112	6749	E P BARBER		25.00
00	115	6842	J J CONLON JR	2.50	20.00
00	124	0464	J D TENNEY		6.00
00	126	5261	D J MUDRY	.50	4.00
00	141	2948	D GRAY	2.00	16.00
00	146	0913	J K SNEAD	1.25	10.00
00	160	3715	C A DELUCIA	3.00	24.00
00	165	4764	P J BASILE	8.00	64.00
00	166	9042	S L BIERNAT	4.00	12.00

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PAC REPORT

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CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	169	9662	B FREIMUTH	3.00	24.00
00	192	9349	V B TIERNEY	1.50	12.00
00	202	4842	J J FULLANA	5.00	40.00
00	205	9679	F G CARTER		15.00
00	205	0642	J B DAYTON	5.00	40.00
00	205	5515	E F SHUGRUE	3.50	28.00
00	206	6791	C A HAYES	5.00	40.00
00	206	7960	L C DRAGOLI	2.50	20.00
00	208	6952	P J DENZA	5.00	30.00
00	208	7937	A H BEQUARY	36.00	36.00
00	210	4319	C MCCARTHY	2.00	16.00
00	210	7230	G G HORN	5.00	40.00
00	213	8813	N E FITZPATRICK JR	5.00	20.00
00	215	2294	S H BATES	10.00	40.00
00	226	1685	M C PARTINGTON	5.00	20.00
00	227	4834	R H GLODE	5.00	40.00
00	227	2865	J A BEIR	5.00	40.00
00	233	6953	G J MEEHAN	10.00	30.00
00	510	7583	J G FORTSCH	2.50	16.68
00	535	4410	M S CAVANAUGH	5.00	40.00
00	536	2522	B F VIVERITO	25.00	200.00
00	537	1747	M D FELLION	6.00	44.00
00	537	8267	J J BALD	5.00	40.00
00	540	1817	J F ASPINWALL		30.00
00	540	0734	J P RAFFERTY	5.00	20.00

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PAC REPORT

RUN TIME 15:04:35
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	560	6136	J BODE	7.50	50.00
00	561	3715	P PIRROTTA	10.00	80.00
00	580	5327	B M BUDNICK	10.00	80.00
00	585	0464	J A WILDER	1.25	10.00
00	585	4618	S G NYSTROM	20.00	160.00
00	595	6671	D HEARD III	15.00	100.00
00	785	5924	G E RUSSELL JR	25.00	175.00
01	000	5406	E G CHIARAMONTE	40.00	320.00
01	001	9062	J R BERGER	25.00	200.00
01	005	4573	D R CRINITI	1.50	12.00
01	005	1144	T D CRONEN	8.50	68.00
01	005	3791	W R MILLER	6.67	53.36
01	010	0509	R E GALIPO	20.00	160.00
01	010	7511	D DIX JR	10.00	80.00
01	010	0041	R G CHRISTENSEN	10.00	80.00
01	020	6366	S P ARONSON		10.00
01	025	0612	J A DIGEL	3.00	24.00
01	025	0370	T E MCKINLAY	2.00	16.00
01	025	5820	J M RICHARDSON	20.00	100.00
01	025	5775	R P ENGVALL JR	4.00	32.00
01	025	5211	C N GIANOPULOS	2.00	6.00
01	030	3264	L A DUNLAP JR	10.00	80.00
01	030	7249	P J SPOSITO	10.00	60.00
01	030	9364	E C KERIN	2.00	8.00
01	035	1404	R L COLE	10.00	80.00

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 00600 PC 08-31-87 08 4 PAC REPORT

RUN TIME 15:06:35
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPLS	NAME	CURR. PAC	YTD PAC
01	035	9559	J W WESTLAND	2.00	16.00
01	035	6759	M D GALVIN	0.50	54.00
01	035	9434	S C HOLLAND	5.00	40.00
01	035	5752	B W MCCOLLUM	5.00	40.00
01	070	0307	J F SAVAGE III	20.00	160.00
01	000	1302	M C KRAYER	5.00	20.00
01	100	5432	M B SOPER II	35.00	255.00
01	150	0291	R ABEL JR	35.00	200.00
01	249	3499	M S ABEL	2.50	20.00
01	250	9905	D W GRIGLEY	20.00	160.00
01	250	0074	M P SOKOLOSKY	2.00	16.00
01	590	2026	J F FORKUN JR	5.00	40.00
01	590	9209	R G TRUB	25.00	200.00
01	595	2159	C J ZIRUK	5.00	36.66
01	600	0951	M S WALLACE	8.33	61.32
01	600	0324	S G OGBREN	7.50	60.00
01	600	6266	R G COLEGROVE	5.00	40.00
01	750	7722	J R DUAN	30.00	240.00
01	751	3342	M STODRIAK JR	6.00	48.00
01	751	3093	J F ABATE	5.00	40.00
01	751	6166	P TENNEY	5.00	20.00
01	751	7419	J A GUTLEY	7.00	56.00
01	900	1703	M B HESKILL	20.00	160.00
01	900	6096	S VAN BATENBURG	5.00	40.00
01	909	0023	M G ROOT	5.00	40.00

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PAC REPORT

RUN TIME 15:04:35
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	998	0558	D BOYD	6.00	48.00
02	001	0406	J J CAROSELLA	10.00	80.00
02	001	8726	A J CICCHETTI	10.00	80.00
02	002	7859	J F BLAKE	10.00	80.00
02	008	1533	H L HARRINGTON JR	5.00	52.00
02	011	1288	J J SPEAR	10.00	64.00
02	020	8907	T B FAGAN	10.00	80.00
02	030	5089	F T PLEVA	5.00	40.00
02	511	3454	M E MCGUINNESS	4.00	32.00
02	511	0905	W O WARREN	3.00	24.00
02	528	3588	P J MCDEVITT JR	20.83	166.64
02	535	1806	P A FUDGE	2.50	20.00
02	545	4280	P HONES	2.00	16.00
02	569	4699	P H FOGGI	3.75	21.25
02	569	7791	K S DUBE	3.00	9.00
02	569	9766	R BERRY	6.00	24.00
02	575	6714	R A GUENTER	60.00	440.00
02	740	5631	R F LUX	2.00	16.00
02	830	1333	M E MARKS	15.00	100.00
02	832	3353	D CAREY	3.00	24.00
03	002	4361	R R FOSTER	25.00	200.00
03	010	1105	R J RANELLI	20.00	80.00
03	010	1004	R F POUND JR	20.00	160.00
03	025	2297	J A HINCKLEY	5.00	40.00
03	040	3929	C L HANNAH	1.00	8.00

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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	080	7524	S A WESTALL	12.00	96.00
03	080	8835	S R WALKER	25.00	100.00
03	080	1704	J W ROSTON	20.00	160.00
03	115	7326	K T PELLETIER	4.00	16.00
03	115	8471	C C MANLEY	3.00	24.00
03	115	8721	J A GOODFELLOW	2.00	16.00
03	125	5751	G M BROPHY	6.00	48.00
03	144	5893	S I AUCOIN	1.25	5.00
03	162	3994	J C REED	2.00	16.00
03	215	5033	R J MERHLE	2.50	10.00
03	228	5838	A S ALUSKA	2.00	16.00
03	228	7105	D E MATTHEWS	5.00	40.00
03	228	5807	M P DAMBRISI	5.00	40.00
03	240	4053	B F DIDAN	3.00	12.00
03	260	6268	F A BROWN	2.00	16.00
03	410	3560	G L DUROST	20.00	160.00
03	410	5192	J M SULLIVAN		30.00
03	440	5138	R L ST PIERRE	2.00	16.00
03	460	2238	M A KOENIG	2.50	20.00
03	701	1630	M P ARIAS	5.00	40.00
03	752	9995	Z H CHAMBERS		20.00
04	010	0509	F A LARSON	30.00	220.00
04	020	2635	A P BOECKLIN	10.00	40.00
04	030	3226	J P CARLEY	20.00	114.00
04	045	7141	J J MILLER	6.00	48.00

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RUN DATE 07-28-87
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PAC REPORT

RUN TIME 15:04:35
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
04	060	0074	J FISKE JR	5.00	40.00
04	080	5927	M E DEVINE	8.00	64.00
04	100	8197	R L AUGUST	3.00	24.00
04	105	4661	A M AUBURN		60.00
04	125	0015	M M HOPKINS	1.00	8.00
04	125	2894	B R CALDER	6.25	50.00
04	126	5221	M PRIOR	3.00	12.00
04	126	2744	L HAMILTON	1.00	8.00
04	130	4891	J L DELUCIA JR	10.00	60.00
04	130	2974	M R LARENSEN JR	5.00	32.00
04	130	1387	M H VALLERA	.50	4.00
04	160	2662	P R TRACEY	9.00	72.00
04	160	5150	G P AHRENS	5.00	40.00
04	160	4439	G W BISHOP	1.50	12.00
04	165	6011	N J CURRIE	10.00	80.00
04	165	6153	B J CUNNINGHAM	8.00	32.00
04	175	0832	A R JANN	7.50	60.00
04	190	3883	J R HESS		35.00
04	190	1548	S A VEIT		7.50
04	210	0967	J W BIXLER	15.00	95.00
04	230	2572	M R BOUCHARD	20.00	120.00
04	230	8368	M L BISCARDI	10.00	40.00
05	030	9179	D M THORNEY	1.25	10.00
05	800	9190	J M HENDRICKSON	5.00	40.00
05	800	9806	J A KELLER	5.00	40.00

9 9 0 4 0 7 / 5 4 1 5

RUN DATE 07-20-87

RUN TIME 15:04:35

COMPANY RPT DATE PP
00600 PC 08-31-87 08

PAGE
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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	810	6779	P H DROVIN	8.00	64.00
05	820	3375	R S KOLLMEYER	2.50	20.00
05	820	1549	M Q MCNAMARA	2.50	18.00
06	088	4419	W E KILPATRICK	.75	6.00
06	088	4356	G J MURPHY	4.00	32.00
06	088	0385	J H HARRIGAN	10.00	80.00
06	088	7567	R J DEMAYO	10.00	80.00
06	210	0138	R J DALLAI	5.00	40.00
06	210	0317	K L SCHLEGEL	5.00	40.00
06	225	4266	T CAHILL	30.00	240.00
06	230	2045	W E LOFGREN	20.00	80.00
06	240	7446	A J CAMPANELLI	40.00	320.00
06	250	1390	S M PROTO	5.00	40.00
06	250	1916	R F MOTASKY	3.50	28.00
06	250	2293	C O STRAUB	10.00	80.00
06	250	6613	R L EIGLER	5.00	20.00
06	342	1415	D R MAROTTO	5.00	40.00
06	342	7540	J P CANTIN	2.50	10.00
06	560	5279	S T INGALLS SR	2.50	20.00
06	560	2025	D F KANOFF	5.00	40.00
06	563	5161	W G KEELEY	5.00	20.00
06	563	9676	D A MURLEY		15.00
06	563	4854	M D LEBRIN	1.25	10.00
06	563	1525	S L REYNOLDS	5.00	36.00
06	564	0321	R E DELL	5.00	40.00

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RUN DATE 07-28-07
COMPANY RPT DATE PP
00600 PC 08-31-07 00

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9

PAC REPORT

RUN TIME 15:04:35
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPLS	NAME	CURR.PAC	YTD PAC
06	720	0733	J A YOUNG	30.00	90.00
06	721	9332	S BURT	6.00	48.00
08	010	6833	E S KRAUS	38.00	301.50
08	010	4419	H T BROMAGE	40.00	320.00
08	010	7949	S P COOLEY	50.00	400.00
08	010	0061	G S OVERSTROM	100.00	740.00
08	010	1037	R H KNISEL	50.00	400.00
08	010	3729	J A DALEY	75.00	540.00
08	010	6102	T F MULLANEY JR	40.00	320.00
08	030	1302	R H DENNISON	5.00	40.00

COMPANY TOTALS

2023.58

14662.18

6-50

2030.08

9 9 0 4 0 7 5 4 1 7

9 9 0 4 0 7 7 5 4 1 8

RUN DATE 07-28-87
COMPANY RPT DATE PP PAGE
01100 PC 08-31-87 08 1

PAC REPORT

RUN TIME 15:04:37
CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	325	7139	J D CASALE	5.00	40.00
08	325	7683	T M EGAN	1.50	12.00

COMPANY TOTALS

6.50 52.00

9 9 0 4 0 7 7 5 4 1 9

RUN DATE 07-28-87
COMPANY RPT DATE PP PAGE
01500 PC 08-31-87 08 1

PAC REPORT

RUN TIME 15:04:37
CONNECTICUT NATIONAL TRUST COMPANY OF FLORIDA
725 COLORADO AVE STUART FL 33495-2317

BR	DEPT	EMPLS	NAME
08	400	7797	R L RICE

CURR.PAC

YTD PAC

12.48

COMPANY TOTALS

12.48

42
B1

ENDORSED LIST EACH CHECK SEPARATELY.
Checks and other items are received for deposit subject to the terms and conditions of this bank's collection agreement

DATE 9/2/87

DOLLARS NTS

CURRENCY

COIN

CHECKS

1946.08

9 9 0 4 0 7 7 5 4 2 0

Connecticut National Bank

HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE STATE

TOTAL ITEMS

TOTAL DEPOSIT

1946.08

TOTAL
PLEASE ENTER TOTAL HERE

1946.08

⑆011900445⑆ 0059 6229⑈

enter Debit

Connecticut National Bank

Date 9/2/87

2	If Correction	
4	Check →	
	Debit	11

G/L Acct. No.	
5-11	6105

Center No.	
15-18	2572

Source	
23-26	2573

Amount	
33-43	194608

Description 1 44-68											
no											

Description 2 69-90											
6105-2572											

Comments: Co. #6 P/R of 9/2/87

pac center
Name of G/L Account Used

Payroll
Name of Center Originating Entry (Source)

Julia Conroy
Red E's Full Name

0022486
Employee Number

Klum
Approved By (Full Name) Who is Authorized To Approve Entries From This Center And is Not The Person Who Prepared This Entry

13439
Employee Number

9 9 0 4 0 7 7 5 4 2 1

RUN DATE 08-25-87
 COMPANY RPT DATE PP
 00600 PC 09-30-87 09

PAGE
 1

PAC REPORT

RUN TIME 10:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS ✓	10.00	90.00
00	005	0564	B M CHESTER ✓		15.00
00	024	9121	L P BEAUDOIN ✓	2.00	18.00
00	030	4777	D W VALENTINE ✓	4.00	36.00
00	039	5287	J M CONTI ✓	2.50	22.50
00	047	9637	B L ZEBROWSKI	1.00	9.00
00	052	3941	G M GENDREAU		7.50
00	055	0562	R S CROSS ✓	3.00	15.00
00	072	3862	R K OVALLE	5.00	45.00
00	090	4754	T E FLANNERY		30.00
00	090	3978	J Q HILLS	1.00	9.00
00	090	4157	N M FALLS	6.25	50.00
00	091	8572	A L KNICELY	30.00	150.00
00	094	9512	J W LUX JR	2.00	10.00
00	101	1654	H M ZERFING II	1.25	11.25
00	109	1681	K A POLLACK	1.25	11.25
00	112	6749	E P BARBER		25.00
00	115	6842	J J CONLON JR	2.50	22.50
00	124	0464	J D TENNEY		6.00
00	126	5261	D J HUDRY	.50	4.50
00	141	2948	D GRAY	2.00	10.00
00	146	0913	J K SNEAD	1.25	11.25
00	160	3715	C A DELUCIA	3.00	27.00
00	165	4764	P J BASILE	8.00	72.00
00	166	9042	S L BIERNAT	4.00	16.00

9 9 0 4 0 7 7 5 4 2 2

RUN DATE 08-25-87
COMPANY RPT DATE PP
00600 PC 09-30-87 09

PAGE
2

PAC REPORT

RUN TIME 14:27:53
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	169	9662	B FREIMUTH	3.00	27.00
00	192	9349	V B TIERNEY	1.50	13.50
00	202	4842	J J FULLANA	5.00	45.00
00	205	9679	F G CARTER		15.00
00	205	0642	J B DAYTON	5.00	45.00
00	205	5515	E F SHUGRUE	3.50	31.50
00	206	6791	C A HAYES	5.00	45.00
00	206	7960	L C DRAGOLI	2.50	22.50
00	206	6952	P J DENZA	5.00	35.00
00	208	7937	A N BEQUARY	36.00	72.00
00	210	4319	C MCCARTHY	2.00	18.00
00	210	7238	G G HORN	5.00	45.00
00	213	8813	N E FITZPATRICK JR	5.00	25.00
00	215	2294	S W BATES	10.00	50.00
00	217	7507	R J DEMAYO	10.00	90.00
00	226	1685	W C PARTINGTON	5.00	25.00
00	227	4834	R H GLODE	5.00	45.00
00	227	2865	J A BEIR	5.00	45.00
00	233	6953	G J MEEHAN	10.00	40.00
00	510	7583	J G FORTSCH		16.68
00	535	4410	M S CAVANAUGH	5.00	45.00
00	536	2522	B F VIVERITO	25.00	225.00
00	537	1747	M D FELLION	6.00	50.00
00	537	8267	J J BALD	5.00	45.00
00	540	1817	J F ASPINHALL		30.00

9 9 0 4 0 7 7 5 4 2 3

RUN DATE 08-25-87
 COMPANY RPT DATE PP PAGE
 00600 PC 09-30-87 09 3

PAC REPORT

RUN TIME 14:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR. PAC	YTD PAC
00	540	0734	J P RAFFERTY	5.00	25.00
00	560	6136	J BODE	7.50	57.50
00	561	3715	P PIRROTTA	10.00	90.00
00	580	5327	B M BUDNICK	10.00	90.00
00	585	0464	J A WILDER	1.25	11.25
00	585	4618	S G NYSTROM	20.00	180.00
00	595	6671	D HEARD III	15.00	115.00
00	785	5924	G E RUSSELL JR	25.00	200.00
01	000	5406	E G CHIARAMONTE	40.00	560.00
01	001	9802	J R BERGER	25.00	225.00
01	005	4573	D R CRINITI		12.00
01	005	1144	T D CRONEN	8.50	76.50
01	005	3791	W R MILLER	6.67	60.03
01	010	0509	R E GALIPO	20.00	100.00
01	010	7511	D DIX JR	10.00	90.00
01	010	0041	R G CHRISTENSEN	10.00	90.00
01	020	6566	S P ARONSON		10.00
01	025	0612	J A DIGEL	3.00	27.00
01	025	8370	T E MCKINLAY	2.00	18.00
01	025	5820	J M RICHARDSON	20.00	120.00
01	025	5775	R P ENGVALL JR	4.00	36.00
01	025	5211	C N GIANOPULOS	2.00	8.00
01	030	3264	L A DUNLAP JR	10.00	90.00
01	030	7249	P J SPOSITO	10.00	70.00
01	030	9364	E C KERIN	2.00	10.00

9 9 0 4 0 7 7 5 4 2 4

RUN DATE 08-25-87

RUN TIME 14:27:53

COMPANY RPT DATE PP
00600 PC 09-30-87 09

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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	035	1404	R L COLE	10.00	90.00
01	035	9559	J H WESTLAND	2.00	18.00
01	035	6759	M D GALVIN	8.50	62.50
01	035	9434	S C HOLAHAN	5.00	45.00
01	035	5752	B W MCCOLLUM	5.00	45.00
01	070	8387	J F SAVAGE III	20.00	180.00
01	080	1382	M C KRAMER	5.00	25.00
01	100	5632	M B SOPER II	35.00	290.00
01	150	0291	R ABEL JR	35.00	315.00
01	249	3499	M S ABEL	2.50	22.50
01	250	9905	D W GRIGLEY	20.00	180.00
01	250	0074	M P SOKOLOSKY	2.00	18.00
01	590	2820	J F MORKAN JR	5.00	45.00
01	590	9289	R G TRUB	25.00	225.00
01	595	2159	C J ZIRUK	5.00	41.68
01	600	0951	M S WALLACE	8.33	69.65
01	680	8324	S G OGREN	7.50	67.50
01	680	6266	R G COLEGROVE	5.00	45.00
01	750	7722	J R DUNN	30.00	270.00
01	751	3342	M SYDORIAK JR	6.00	54.00
01	751	3093	J F ABATE	5.00	45.00
01	751	6166	P TENNEY	5.00	25.00
01	751	7419	J A QUIGLEY	7.00	63.00
01	980	1783	M B MESKILL	20.00	180.00
01	980	6898	S VAN BATENBURG	5.00	45.00

9 9 0 4 0 7 7 5 4 2 5

RUN DATE 06-25-87
 COMPANY RPT DATE PP
 00600 PC 09-30-87 09

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PAC REPORT

RUN TIME 14:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	989	0823	M G ROOT	5.00	45.00
01	998	0558	D BOYD	6.00	54.00
02	001	0406	J J CAROSELLA	10.00	90.00
02	001	8726	A J CICCETTI	10.00	90.00
02	002	7859	J F BLAKE	10.00	90.00
02	008	1533	W L HARRINGTON JR	5.00	87.00
02	011	1288	J J SPEAR	10.00	74.00
02	020	8907	T B FAGAN	10.00	90.00
02	030	5089	F T PLEVA	5.00	48.00
02	511	3454	M E MCGUINNESS	4.00	36.00
02	511	0905	W O WARREN	3.00	27.00
02	528	3588	P J MCDEVITT JR	20.83	107.47
02	535	1806	P A FUDGE	2.50	22.50
02	565	4280	P HOWES	2.00	18.00
02	569	4699	P M POGGI	3.75	25.00
02	569	7791	K S DUBE	3.00	12.00
02	569	9766	R BERRY	6.00	30.00
02	575	6714	R A GUENTER	60.00	500.00
02	740	5631	R F LUX	2.00	18.00
02	830	1333	M E MARKS	15.00	115.00
02	832	3353	D CAREY	3.00	27.00
03	002	4361	R R FOSTER	25.00	225.00
03	010	1105	R J RANELLI	20.00	100.00
03	010	1004	R F POUND JR	20.00	100.00
03	025	2297	J A HINCKLEY	5.00	45.00

9 9 0 4 0 7 7 5 4 2 0

RUN DATE 08-25-87
 COMPANY RPT DATE PP
 00600 PC 09-30-87 09

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PAC REPORT

RUN TIME 14:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	040	3929	C L HANNAH	1.00	9.00
03	080	7524	S A WESTALL	12.00	108.00
03	080	8835	S R WALKER	25.00	125.00
03	080	1704	J W ROSTON	20.00	180.00
03	115	7326	K T PELLETIER	4.00	20.00
03	115	8471	C C MANLEY	3.00	27.00
03	115	8721	J A GOODFELLOW	2.00	18.00
03	125	5751	G M BROPHY	6.00	54.00
03	144	5893	S I AUCOIN	1.25	6.25
03	162	3994	J C REED	2.00	18.00
03	215	5033	R J WERHLE	2.50	12.50
03	228	5838	A S ALUSKA	2.00	18.00
03	228	7105	D E MATTHEWS	5.00	45.00
03	228	5807	M P DAMBRISI	5.00	45.00
03	240	4053	B F DIDAN	3.00	15.00
03	260	6268	F A BROWN	2.00	18.00
03	410	3560	G L DUROST	20.00	180.00
03	410	5192	J W SULLIVAN		30.00
03	440	5138	R L ST PIERRE	2.00	18.00
03	460	2238	M A KOENIG	2.50	22.50
03	701	1630	M P ARIAS	5.00	45.00
03	752	9995	Z M CHAMBERS		20.00
04	010	0509	F A LARSON	30.00	250.00
04	020	2635	A P BOECKLIN	10.00	50.00
04	030	3226	J P CARLEY	20.00	134.00

(M.L.W.)
 2/5

9 9 0 4 0 7 7 5 4 2 7

RUN DATE 08-25-87
 COMPANY RPT DATE PP
 00600 PC 09-30-87 09

PAGE
 7

PAC REPORT

RUN TIME 14:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
04	045	7141	J J MILLER	6.00	54.00
04	060	0074	J FISKE JR	5.00	45.00
04	080	5927	M E DEVINE	8.00	72.00
04	100	8197	R L AUGUST	3.00	27.00
04	105	4661	A M AUBURN		69.00 <i>not this period</i>
04	125	0015	M M HOPKINS	1.00	9.00
04	125	2894	B R CALDER	6.25	56.25
04	126	5221	M PRIOR	3.00	15.00
04	126	2744	L HAMILTON	1.00	9.00
04	130	4591	J L DELUCIA JR	10.00	70.00
04	130	2974	W R LARENSEN JR	5.00	57.00
04	130	1387	M H VALLERA	.50	4.50
04	160	2662	P R TRACEY	9.00	81.00
04	160	5150	G P AHRENS	5.00	45.00
04	160	4439	G W BISHOP	1.50	13.50
04	165	6011	N J CURRIE	10.00	90.00
04	165	6153	B J CUNNINGHAM	8.00	40.00
04	175	0832	A R JANN	7.50	67.50
04	190	3883	J R HESS		35.00
04	190	1548	S A VEIT		7.50
04	210	0967	J W BIXLER	15.00	110.00
04	230	2572	N R BOUCHARD	20.00	140.00
04	230	8368	M L BISCARDI	10.00	50.00
05	030	9179	D M THORNEY	1.25	11.25
05	800	9190	J M HENDRICKSON	5.00	65.00

9 9 0 4 0 7 7 5 4 2 8

RUN DATE 08-25-87
 COMPANY RPT DATE PP PAGE
 00600 PC 09-30-87 09 8

PAC REPORT

RUN TIME 14:27:53
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	800	9806	J A KELLER	5.00	45.00 ✓
05	810	6779	P M DROUIN	8.00	72.00 ✓
05	820	3375	R S KOLLMEYER	2.50	22.50
05	820	1549	M Q MCNAMARA	2.50	20.50
06	088	4419	W E KILPATRICK	.75	6.75
06	088	4356	G J MURPHY	4.00	36.00 ✓
06	088	0385	J H HARRIGAN	10.00	90.00 ✓
06	210	0138	R J DALLAI	5.00	65.00 ✓
06	210	0317	K L SCHLEGEL	5.00	45.00
06	225	4266	T CAHILL	30.00	270.00 ✓
06	230	2845	W E LOFGREN	20.00	100.00 ✓
06	240	7446	A J CAMPANELLI	40.00	360.00 ✓
06	250	1390	S H PROTO	5.00	45.00 ✓
06	250	1916	R F MOTASKY	3.50	31.50 ✓
06	250	2293	C O STRAUB	10.00	90.00 ✓
06	250	6613	R L EIGLER	5.00	25.00
06	342	1415	D R MAROTTO	5.00	45.00 ✓
06	342	7540	J P CANTIN	2.50	12.50
06	560	5279	S T INGALLS SR	2.50	22.50
06	560	2025	D F KANOFF	5.00	45.00 ✓
06	563	5161	W G KEELEY	5.00	25.00
06	563	9676	D A HURLEY		15.00
06	563	4854	N D LEBRUN	1.25	11.25
06	563	1525	S L REYNOLDS	5.00	41.00 ✓
06	564	0321	R E DELL	5.00	45.00 ✓

0 9 0 4 0 7 7 5 4 2 9

RUN DATE 08-25-87
COMPANY RPT DATE PP PAGE
00600 PC 09-30-87 09 9

PAC REPORT

RUN TIME 14:27:53
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
06	720	8733	J A YOUNG	30.00	120.00
06	721	9332	S BURT	6.00	54.00
08	010	6833	E S KRAUS	38.00	339.50
08	010	4419	W T BROMAGE	40.00	360.00
08	010	7949	S P COOLEY	50.00	450.00
08	010	0061	G S OVERSTROM	100.00	840.00
08	010	1037	R H KNISEL	50.00	450.00
08	010	3729	J A DALEY		540.00
08	010	6102	T F MULLANEY JR	40.00	360.00
08	030	1302	R W DENNISON		40.00

COMPANY TOTALS

1939.50

16601.76

6.50

1946.08

9 9 0 4 0 7 / 5 4 3 0

RUN DATE 08-25-87

RUN TIME 14:27:55

COMPANY RPT DATE PP PAGE
01100 PC 09-30-87 09 1

CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	325	7139	J D CASALE	5.00	45.00 ✓
08	325	7683	T W EGAN	1.50	13.50
COMPANY TOTALS				6.50	58.50

9 9 0 4 0 7 7 5 4 3 1

RUN DATE 08-25-87
COMPANY RPT DATE PP PAGE
01500 PC 09-30-87 09 1

PAC REPORT

RUN TIME 14:27:55
CONNECTICUT NATIONAL TRUST COMPANY OF FLORIDA
725 COLORADO AVE STUART FL 34995-2317

BR	DEPT	EMPL#	NAME
08	400	7797	R L RICE

CURR.PAC

YTD PAC

12.48

COMPANY TOTALS

12.48

9 9 0 4 0 7 7 5 4 3 J

RUN DATE 10-27-87
COMPANY RPT DATE PP PAGE
01500 PC 11-30-87 11 1

PAC REPORT

RUN TIME 15:19:59
CONNECTICUT NATIONAL TRUST COMPANY OF FLORIDA
725 COLORADO AVE STUART FL 33495-2317

BR DEPT EMPL# NAME
08 400 7797 R L RICE

CURR.PAC

YTD PAC

12.48

COMPANY TOTALS

12.48

9 9 0 4 0 7 7 5 4 3 4

RUN DATE 10-27-87
COMPANY RPT DATE PP PAGE
01100 PC 11-30-87 11 1

PAC REPORT

RUN TIME 15:19:50
CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	325	7139	J D CASALE	5.00	55.00
08	325	7683	T W EGAN	1.50	16.50

COMPANY TOTALS

6.50 71.50

9 9 0 4 0 7 7 5 4 3 5

RUN DATE 10-27-87
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PAC REPORT

RUN TIME 15:19:56
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS	10.00	110.00
00	005	0564	B M CHESTER		15.00
00	024	9121	L P BEAUDOIN	2.00	22.00
00	030	4777	D M VALENTINE	4.00	44.00
00	039	5287	J M CONTI	2.50	27.50
00	047	9637	B L ZEBROWSKI	1.00	11.00
00	052	3941	G M GENDREAU		7.50
00	090	4754	T E FLANNERY		50.00
00	090	3978	J R HILLS	1.00	11.00
00	090	4157	N M FALLS	6.25	62.50
00	091	7419	J A QUIGLEY	7.00	77.00
00	091	8572	A L KNICELY	30.00	210.00
00	094	9512	J M LUX JR	2.00	14.00
00	101	1654	H M ZERFING II	1.25	13.75
00	109	1681	K A POLLACK	1.25	13.75
00	112	0562	R S CROSS	3.00	21.00
00	112	6749	E P BARBER		25.00
00	115	6842	J J CONLON JR	2.50	27.50
00	124	0464	J D TENNEY		6.00
00	126	5261	D J MUDRY	.50	5.50
00	141	2948	D GRAY	2.00	22.00
00	146	0913	J K SNEAD	1.25	13.75
00	160	3715	C A DELUCIA	3.00	33.00
00	165	4764	P J BASILE	8.00	88.00
00	166	9042	S L BIERNAT	4.00	24.00

9 9 0 4 0 7 7 5 4 3 0

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PAC REPORT

RUN TIME 15:19:56
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	169	9662	B FREIMUTH	3.00	33.00
00	192	9349	V B TIERNEY	1.50	16.50
00	202	4842	J J FULLANA	5.00	55.00
00	205	9679	F G CARTER		15.00
00	205	0642	J B DAYTON	5.00	55.00
00	205	5515	E F SHUGRUE	3.50	38.50
00	206	6791	C A HAYES	5.00	55.00
00	206	7960	L C DRAGOLI	2.50	27.50
00	208	6952	P J DENZA	5.00	45.00
00	208	7937	A N BEQUARY	36.00	144.00
00	210	4319	C MCCARTHY	2.00	22.00
00	210	7238	G G HORN	5.00	55.00
00	213	8813	N E FITZPATRICK JR	5.00	35.00
00	215	2294	S M BATES	10.00	70.00
00	217	7507	R J DEMAYO	10.00	110.00
00	226	1685	W C PARTINGTON	5.00	35.00
00	227	4834	R H GLODE	5.00	55.00
00	227	2865	J A BEIR	5.00	55.00
00	233	6953	G J MEEHAN	10.00	60.00
00	510	7583	J G FORTSCH		16.68
00	535	4410	M S CAVANAUGH	5.00	55.00
00	536	2522	B F VIVERITO	25.00	275.00
00	537	1747	M D FELLION	6.00	62.00
00	537	8267	J J BALD	5.00	55.00
00	540	1817	J F ASPINMALL		30.00

9 9 0 4 0 7 7 5 4 3 7

RUN DATE 10-27-87
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CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	540	0734	J P RAFFERTY	5.00	35.00
00	560	6136	J BODE	7.50	72.50
00	561	3715	P PIRROTTA	10.00	110.00
00	580	5327	B M BUDNICK	10.00	110.00
00	585	0464	J A WILDER	1.25	13.75
00	585	4618	S G NYSTROM		200.00
00	595	6671	D HEARD III	15.00	145.00
00	785	5924	G E RUSSELL JR	25.00	250.00
01	000	5406	E G CHIARAMONTE	40.00	440.00
01	001	9802	J R BERGER	25.00	275.00
01	005	4573	D R CRINITI		12.00
01	005	1144	T D CRONEN	8.50	93.50
01	005	3791	W R MILLER	6.67	73.37
01	010	0509	R E GALIPO	20.00	220.00
01	010	7511	D DIX JR	10.00	110.00
01	010	0041	R G CHRISTENSEN	10.00	110.00
01	020	6566	S P ARONSON		10.00
01	025	0612	J A DIGEL	3.00	33.00
01	025	8370	T E MCKINLAY	2.00	22.00
01	025	5820	J M RICHARDSON	20.00	160.00
01	025	5775	R P ENGVALL JR	4.00	44.00
01	025	5211	C N GIANOPULOS	2.00	12.00
01	030	3264	L A DUNLAP JR	10.00	110.00
01	030	7249	P J SPOSITO	10.00	90.00
01	030	9364	E C KERIN	2.00	14.00

0 9 0 4 0 7 7 5 4 3 8

RUN DATE 10-27-87

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COMPANY RPT DATE PP
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PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	035	1404	R L COLE	10.00	110.00
01	035	9559	J W WESTLAND	2.00	22.00
01	035	6759	M D GALVIN	8.50	79.50
01	035	9434	S C HOLAHAN	5.00	55.00
01	035	5752	B W MCCOLLUM	5.00	55.00
01	070	8387	J F SAVAGE III	20.00	220.00
01	080	1382	M C KRAMER	5.00	35.00
01	100	5632	M B SOPER II	35.00	360.00
01	150	0291	R ABEL JR	35.00	385.00
01	249	3499	M S ABEL	2.50	27.50
01	250	9905	D W GRIGLEY	20.00	220.00
01	250	0074	M P SOKOLOSKY	2.00	22.00
01	590	2820	J F MORKAN JR	5.00	55.00
01	590	9289	R G TRUB	25.00	275.00
01	595	2159	C J ZIRUK	5.00	51.68
01	600	0951	M S WALLACE	8.33	86.31
01	680	8324	S G OGREN	7.50	82.50
01	680	6266	R G COLEGROVE	5.00	55.00
01	750	7722	J R DUNN	30.00	330.00
01	751	3093	J F ABATE	5.00	55.00
01	751	6166	P TENNEY	5.00	35.00
01	980	1783	M B MESKILL	20.00	220.00
01	980	3862	R K OVALLE	5.00	55.00
01	980	6898	S VAN BATENBURG	5.00	55.00
01	989	0823	M G ROOT	5.00	55.00

9 9 0 4 0 7 7 5 4 3 9

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PAC REPORT

RUN TIME 18:19:56
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	998	0558	D BOYD	6.00	66.00
02	001	0406	J J CAROSELLA	10.00	110.00
02	001	8726	A J CICCHETTI	10.00	110.00
02	002	7859	J F BLAKE	10.00	110.00
02	008	1533	W L HARRINGTON JR	5.00	67.00
02	011	1288	J J SPEAR	10.00	94.00
02	020	8907	T B FAGAN	10.00	110.00
02	030	5089	F T PLEVA	5.00	55.00
02	511	3454	M E MCGUINNESS	4.00	44.00
02	511	0905	W O WARREN	3.00	33.00
02	528	3588	P J MCDEVITT JR	20.83	229.13
02	535	1806	P A FUDGE	2.50	27.50
02	565	4280	P HOWES	2.00	22.00
02	569	4699	P M POGGI	3.75	32.50
02	569	7791	K S DUBE	3.00	18.00
02	569	9766	R BERRY	6.00	42.00
02	575	6714	R A GUENTER	60.00	620.00
02	740	5631	R F LUX	2.00	22.00
02	830	1333	M E MARKS	15.00	145.00
02	832	3353	D CAREY	3.00	33.00
03	002	4361	R R FOSTER		225.00
03	010	1105	R J RANELLI	20.00	140.00
03	010	1004	R F POUND JR	20.00	220.00
03	025	2297	J A HINCKLEY	5.00	55.00
03	040	3929	C L HANNAH	1.00	11.00

9 9 0 4 0 7 7 5 4 4 0

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PAC REPORT

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 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	080	7524	S A WESTALL	12.00	132.00
03	080	8835	S R WALKER	25.00	175.00
03	080	1704	J W ROSTON	20.00	220.00
03	115	7326	K T PELLETIER	4.00	20.00
03	115	8471	C C MANLEY	3.00	33.00
03	115	8721	J A GOODFELLOW	2.00	22.00
03	125	5751	G M BROPHY	6.00	66.00
03	144	5893	S I AUCCOIN	1.25	8.75
03	162	3994	J C REED	2.00	22.00
03	215	5033	R J WERNLE	2.50	17.50
03	228	5838	A S ALUSKA	2.00	22.00
03	228	7105	D E MATTHEWS	5.00	55.00
03	228	5807	M P DAMBRISI	5.00	55.00
03	240	4053	B F DIDAN	3.00	21.00
03	260	6268	F A BROWN	2.00	22.00
03	410	3560	G L DUROST	20.00	220.00
03	410	5192	J W SULLIVAN		30.00
03	440	5138	R L ST PIERRE	2.00	22.00
03	460	2238	M A KOENIG	2.50	27.50
03	752	9995	Z H CHAMBERS		20.00
04	010	0509	F A LARSON	30.00	310.00
04	020	2635	A P BOECKLIN	10.00	70.00
04	030	3226	J P CARLEY	20.00	174.00
04	045	7141	J J MILLER	6.00	66.00
04	060	0074	J FISKE JR	5.00	55.00

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04	105	4661	A M AUBURN		60.00
04	125	0015	M M HOPKINS	1.00	11.00
04	125	2894	B R CALDER	6.25	68.75
04	126	5221	M PRIOR	3.00	21.00
04	126	2744	L HAMILTON	1.00	11.00
04	130	4591	J L DELUCIA JR	10.00	90.00
04	130	2974	W R LARENSEN JR	5.00	47.00
04	130	1387	M H VALLERA	.50	5.50
04	160	2662	P R TRACEY	9.00	99.00
04	160	5150	G P AHRENS	5.00	55.00
04	160	4439	G W BISHOP	1.50	16.50
04	165	6011	N J CURRIE	10.00	110.00
04	165	6153	B J CUNNINGHAM	8.00	56.00
04	175	0832	A R JANN	7.50	82.50
04	190	3883	J R HESS		35.00
04	190	1548	S A VEIT		7.50
04	210	0967	J W BIXLER	15.00	140.00
04	230	2572	N R BOUCHARD	20.00	180.00
04	230	8368	M L BISCARDI	10.00	70.00
05	030	9179	D M THORNEY	1.25	13.75
05	800	9190	J M HENDRICKSON	5.00	55.00
05	800	9806	J A KELLER	5.00	55.00
05	810	6779	P M DROUIN	8.00	88.00

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 COMPANY RPT DATE PP PAGE
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 PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	820	3375	R S KOLLMEYER	2.50	27.50

RUN TIME 15:19:56
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

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PAC REPORT

RUN TIME 15:19:56
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	820	3375	R S KOLLMEYER	2.50	27.50
05	820	1549	M Q MCNAMARA	2.50	25.50
06	088	4419	W E KILPATRICK	.75	8.25
06	088	4356	G J MURPHY	4.00	44.00
06	088	0385	J H HARRIGAN	10.00	110.00
06	088	2845	W E LOFGREN	20.00	140.00
06	210	0138	R J DALLAI		45.00
06	210	0317	K L SCHLEGEL	5.00	55.00
06	225	4266	T CANILL	30.00	330.00
06	240	7446	A J CAMPANELLI	40.00	440.00
06	250	3342	M SYDORIAK JR	6.00	66.00
06	250	1390	S M PROTO	5.00	55.00
06	250	1916	R F MOTASKY	3.50	38.50
06	250	2293	C O STRAUB	10.00	110.00
06	250	6613	R L EIGLER	5.00	35.00
06	342	1415	D R MAROTTO	5.00	55.00
06	342	7540	J P CANTIN	2.50	17.50
06	560	5279	S T INGALLS SR	2.50	27.50
06	560	2025	D F KANOFF	5.00	55.00
06	563	5161	W G KEELEY	5.00	35.00
06	563	9676	D A HURLEY		15.00
06	563	4854	N D LEBRUN	1.25	13.75
06	563	1525	S L REYNOLDS	5.00	51.00
06	564	0321	R E DELL	5.00	55.00
06	720	8733	J A YOUNG	30.00	180.00

9 9 0 4 0 7 7 5 4 4 3

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RUN TIME 15:19:56
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
06	721	9332	S BURT	6.00	66.00
07	025	1630	M P ARIAS	5.00	55.00
08	010	6833	E S KRAUS	38.00	415.50
08	010	4419	W T BROMAGE	40.00	440.00
08	010	7949	S P COOLEY	50.00	550.00
08	010	0061	G S OVERSTROM	100.00	1040.00
08	010	1037	R H KNISEL	50.00	550.00
08	010	3729	J A DALEY		540.00
08	010	6102	T F MULLANEY JR	40.00	440.00
08	030	1302	R W DENNISON		40.00

COMPANY TOTALS

1889.58

20400.92

PLEASE BE AWARE THAT ALL ITEMS ARE PROPERLY
INDEXED. LIST EACH CHECK SEPARATELY.
Checks and other items are received for deposit subject to
the terms and conditions of this bank's collection agreement.

DATE 12/2/87

DOLLARS

CURRENCY

COIN

CHECKS

1894.08

9 9 0 4 0 7 / 5 4 4 4

TOTAL

1894.08

PLEASE ENTER TOTAL HERE

Connecticut National Bank

HARTFORD NATIONAL CORPORATION
POLITICAL ACTION COMMITTEE STATE

TOTAL
ITEMS

TOTAL
DEPOSIT

1894.08

⑆011900445⑆ 0059 6229⑆

Enter Debit

Connecticut National Bank

Date 12/2/87

0	11	Debit
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G/L Acct. No.
5-11
6105

Center No.
15-18
2572

Source
23-26
2573

Amount
33-43
1894.08

Description I 44-66
6105-2572

Description II 66-88
6105-2572

Comments

Account of G/L Account Used

Name of Center Originating Entry (Source)

Michael F. ...
Employee Number 10023486

Payroll
Kilmer
Employee Number 13039

9 9 0 4 0 7 / 5 4 4 5

RUN DATE 11-25-87
 COMPANY RPT DATE PP
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PAC REPORT

RUN TIME 10:16:55
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS ✓	10.00	120.00
00	005	0564	B M CHESTER		15.00
00	024	9121	L P BEAUDOIN	2.00	24.00 ✓
00	030	4777	D W VALENTINE ✓	4.00	48.00
00	039	5287	J M CONTI ✓	2.50	30.00
00	047	9637	B L ZEBROWSKI	1.00	12.00 ✓
00	052	3941	G M GENDREAU		7.50
00	055	6613	R L EIGLER ✓	5.00	40.00
00	090	4754	T E FLANNERY		50.00
00	090	3978	J Q MILLS	1.00	12.00 ✓
00	090	4157	N M FALLS ✓	6.25	68.75
00	091	7419	J A QUIGLEY ✓	7.00	84.00
00	091	8572	A L KNICELY ✓	30.00	240.00
00	092	0317	K L SCHLEGEL ✓	5.00	60.00
00	094	,512	J W LUX JR	2.00	16.00 ✓
00	101	1654	H M ZERFING II	1.25	15.00 ✓
00	109	1681	K A POLLACK	1.25	15.00 ✓
00	112	0562	R S CROSS	3.00	24.00 ✓
00	112	6749	E P BARBER		25.00
00	115	6842	J J CONLON JR ✓	2.50	30.00
00	124	0464	J D TENNEY		6.00
00	126	5261	D J MUDRY	.50	6.00
00	141	2948	D GRAY	2.00	24.00 ✓
00	146	0913	J K SNEAD	1.25	15.00 ✓
00	160	3715	C A DELUCIA ✓	3.00	36.00

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9 9 0 4 0 7 7 5 4 4 0

RUN DATE 11-25-87
 COMPANY RPT DATE PP
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PAC REPORT

RUN TIME 10:16:55
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	165	4764	P J BASILE ✓	8.00	96.00
00	166	9042	S L BIERNAT	4.00	28.00
00	169	9662	B FREIMUTH ✓	3.00	36.00
00	192	9349	V B TIERNEY	1.50	18.00 ✓
00	202	4842	J J FULLANA ✓	5.00	60.00
00	205	9679	F G CARTER		15.00
00	205	0642	J B DAYTON ✓	5.00	60.00
00	205	5515	E F SHUGRUE ✓	3.50	42.00
00	206	6791	C A HAYES ✓	5.00	60.00
00	206	7960	L C DRAGOLI ✓	2.50	30.00
00	208	6952	P J DENZA ✓	5.00	50.00
00	208	7937	A N BEQUARY ✓	36.00	180.00
00	210	4319	C MCCARTHY	2.00	24.00 ✓
00	210	7238	G G HORN ✓	5.00	60.00
00	213	8813	N E FITZPATRICK JR ✓	5.00	40.00
00	215	2294	S M BATES ✓	10.00	80.00
00	217	7507	R J DEMAYO ✓	10.00	120.00
00	226	1685	W C PARTINGTON ✓	5.00	40.00
00	227	4834	R H GLODE ✓	5.00	60.00
00	227	2865	J A BEIR ✓	5.00	60.00
00	233	6953	G J MEEHAN ✓	10.00	70.00
00	510	7583	J G FORTSCH		16.68
00	535	4410	M S CAVANAUGH ✓	5.00	60.00
00	536	2522	B F VIVERITO ✓	25.00	300.00
00	537	1747	M D FELLION ✓	6.00	68.00

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 COMPANY RPT DATE PP
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PAC REPORT

RUN TIME 10:16:55
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	537	8267	J J BALD ✓	5.00	60.00
00	540	1817	J F ASPINMALL		30.00
00	540	0734	J P RAFFERTY ✓	5.00	40.00
00	560	6136	J BODE ✓	7.50	80.00
00	561	3715	P PIRROTTA ✓	10.00	120.00
00	580	5327	B M BUDNICK ✓	10.00	120.00
00	585	0464	J A WILDER	1.25	15.00 ✓
00	585	4618	S G NYSTROM		200.00
00	595	6671	D HEARD III ✓	15.00	160.00
00	785	5924	G E RUSSELL JR ✓	25.00	275.00
01	000	5406	E G CHIARAMONTE ✓	40.00	480.00
01	001	9802	J R BERGER ✓	25.00	300.00
01	005	4573	D R CRINITI		12.00
01	005	1144	T D CRONEN ✓	8.50	102.00
01	005	3791	M R MILLER ✓	6.67	80.04
01	010	0509	R E GALIPO ✓	20.00	240.00
01	010	7511	D DIX JR ✓	10.00	120.00
01	010	0041	R G CHRISTENSEN ✓	10.00	120.00
01	020	6566	S P ARONSON		10.00
01	025	0612	J A DIGEL ✓	3.00	36.00
01	025	8370	T E MCKINLAY	2.00	24.00 ✓
01	025	5820	J M RICHARDSON ✓	20.00	180.00
01	025	5775	R P ENGVALL JR ✓	4.00	48.00
01	025	5211	C N GIANOPULOS	2.00	14.00 ✓
01	030	3264	L A DUNLAP JR ✓	10.00	120.00

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PAC REPORT

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 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	030	7249	P J SPOSITO ✓	10.00	100.00
01	030	9364	E C KERIN	2.00	16.00 ✓
01	035	1404	R L COLE ✓	10.00	120.00
01	035	9559	J W WESTLAND		22.00
01	035	6759	M D GALVIN ✓	8.50	88.00
01	035	9434	S C HOLAHAN ✓	5.00	60.00
01	035	5752	B W MCCOLLUM ✓	5.00	60.00
01	070	8387	J F SAVAGE III ✓	20.00	240.00
01	080	1382	M C KRAMER ✓	5.00	40.00
01	100	5632	W B SOPER II ✓	35.00	395.00
01	150	0291	R ABEL JR ✓	35.00	420.00
01	249	3499	N S ABEL ✓	2.50	30.00
01	250	9905	D W GRIGLEY ✓	20.00	240.00
01	250	6074	W P SOKOLOSKY	2.00	24.00 ✓
01	590	2820	J F MORKAN JR ✓	5.00	60.00
01	590	9289	R G TRUB ✓	25.00	300.00
01	595	2159	C J ZIRUK ✓	5.00	56.68
01	600	0951	M S WALLACE ✓	8.33	94.64
01	680	7791	K S DUBE	3.00	21.00 ✓
01	680	8324	S G OGREN ✓	7.50	90.00
01	680	6266	R G COLEGROVE ✓	5.00	60.00
01	750	7722	J R DUNN ✓	30.00	360.00
01	751	3093	J F ABATE ✓	5.00	60.00
01	751	6166	P TENNEY ✓	5.00	40.00
01	980	1783	M B MESKILL ✓	20.00	240.00

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 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	980	3862	R K OVALLE ✓	5.00	60.00
01	980	6898	S VAN BATENBURG ✓	5.00	60.00
01	989	0823	M G ROOT ✓	5.00	60.00
01	998	0558	D BOYD ✓	6.00	72.00
02	001	0406	J J CAROSELLA ✓	10.00	120.00
02	001	8726	A J CICCHETTI ✓	10.00	120.00
02	002	7859	J F BLAKE ✓	10.00	120.00
02	008	1533	W L HARRINGTON JR ✓	5.00	72.00
02	011	1288	J J SPEAR ✓	10.00	104.00
02	020	8907	T B FAGAN ✓	10.00	120.00
02	030	5089	F T PLEVA ✓	5.00	60.00
02	511	3454	M E MCGUINNESS ✓	4.00	48.00
02	511	0905	W O WARREN ✓	3.00	36.00
02	528	3588	P J MCDEVITT JR ✓	20.83	249.96
02	535	1806	P A FUDGE ✓	2.50	30.00
02	565	4280	P HOMES	2.00	24.00 ✓
02	569	4699	P M POGGI ✓	3.75	36.25
02	569	9766	R BERRY ✓	6.00	48.00
02	575	6714	R A GUENTER ✓	60.00	680.00
02	740	5631	R F LUX	2.00	24.00 ✓
02	832	3353	D CAREY ✓	3.00	36.00
02	855	1333	M E MARKS ✓	15.00	160.00
03	002	4361	R R FOSTER		225.00
03	010	1105	R J RANELLI ✓	20.00	160.00
03	010	1004	R F POUND JR ✓	20.00	240.00

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 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	025	2297	J A HINCKLEY ✓	5.00	60.00
03	040	3929	C L HANNAH	1.00	12.00 ✓
03	080	7524	S A WESTALL ✓	12.00	144.00
03	080	8835	S R WALKER ✓	25.00	200.00
03	080	1704	J M ROSTON ✓	20.00	240.00
03	115	7326	K T PELLETIER ✓	4.00	32.00
03	115	8471	C C MANLEY ✓	3.00	36.00
03	115	8721	J A GOODFELLOW	2.00	24.00 ✓
03	125	5751	G M BROPHY ✓	6.00	72.00
03	144	5893	S I AUCOIN	1.25	10.00 ✓
03	162	3994	J C REED	2.00	24.00 ✓
03	215	5033	R J MERHLE JR.	2.50	20.00 ✓
03	228	5838	A S ALUSKA	2.00	24.00 ✓
03	228	7105	D E MATTHEWS ✓	5.00	60.00
03	228	5807	M P DAMBRISI ✓	5.00	60.00
03	240	4053	B F DIDAN	3.00	24.00 ✓
03	260	6268	F A BROWN	2.00	24.00 ✓
03	410	3560	G L DUROST ✓	20.00	240.00
03	410	5192	J M SULLIVAN		30.00
03	440	5138	R L ST PIERRE	2.00	24.00 ✓
03	460	2238	M A KOENIG ✓	2.50	30.00
03	752	9995	Z M CHAMBERS		20.00
04	010	0509	F A LARSON ✓	30.00	340.00
04	020	2635	A P BOECKLIN ✓	10.00	80.00
04	030	3226	J P CARLEY ✓	20.00	194.00

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777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
04	045	7141	J J MILLER ✓	6.00	72.00
04	060	0074	J FISKE JR.	5.00	60.00
04	080	5927	M E DEVINE ✓	8.00	96.00
04	100	8197	R L AUGUST ✓	3.00	36.00
04	105	4661	A M AUBURN		60.00
04	125	0015	M M HOPKINS	1.00	12.00 ✓
04	125	2894	B R CALDER ✓	6.25	75.00
04	126	5221	M PRIOR	3.00	24.00 ✓
04	126	2744	L HAMILTON	1.00	12.00 ✓
04	130	4591	J L DELUCIA JR ✓	10.00	100.00
04	130	2974	M R LARENSEN JR ✓	5.00	52.00
04	130	1387	M H VALLERA	.50	6.00 ✓
04	160	662	P R TRACEY ✓	9.00	108.00
04	160	5150	G P AHRENS ✓	5.00	60.00
04	160	4439	G W BISHOP	1.50	18.00 ✓
04	165	6011	N J CURRIE ✓	10.00	120.00
04	165	6153	B J CUNNINGHAM ✓	8.00	64.00
04	175	0832	A R JANN ✓	7.50	90.00
04	190	3883	J R HESS		35.00
04	190	1548	S A VEIT		7.50
04	210	0967	J W BIXLER ✓	15.00	155.00
04	230	2572	N R BOUCHARD ✓	20.00	200.00
04	230	8368	M L BISCARDI ✓	10.00	80.00
05	030	9179	D M THORNEY	1.25	15.00 ✓
05	800	9190	J M HENDRICKSON ✓	5.00	60.00

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777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
05	800	9806	J A KELLER ✓	5.00	60.00
05	810	6779	P M DROUIN ✓	8.00	96.00
05	820	3375	R S KOLLMEYER ✓	2.50	30.00
05	820	1549	M Q MCNAMARA	2.50	28.00 ✓
06	088	4419	W E KILPATRICK	.75	9.00 ✓
06	088	4356	G J MURPHY ✓	4.00	48.00
06	088	0385	J H HARRIGAN ✓	10.00	120.00
06	088	2845	W E LOFGREN ✓	20.00	160.00
06	210	0138	R J DALLAI		45.00
06	225	4266	T CAHILL ✓	30.00	360.00
06	240	7446	A J CAMPANELLI ✓	40.00	480.00
06	250	3342	M SYDORIAK JR ✓	6.00	72.00
06	250	1390	S M PROTO ✓	5.00	60.00
06	250	1916	R F MOTASKY ✓	3.50	42.00
06	250	2293	C O STRAUB ✓	10.00	120.00
06	342	1415	D R MAROTTO ✓	5.00	60.00
06	342	7540	J P CANTIN	2.50	20.00 ✓
06	560	5279	S T INGALLS SR ✓	2.50	30.00
06	560	2025	O F KANOFF ✓	5.00	60.00
06	563	5161	W G KEELEY	5.00	40.00
06	563	9676	D A HURLEY		15.00
06	563	4854	N D LEBRUN	1.25	15.00 ✓
06	563	1525	S L REYNOLDS ✓	5.00	56.00
06	564	0321	R E DELL ✓	5.00	60.00
06	720	8733	J A YOUNG ✓	30.00	210.00

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 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
06	721	9332	S BURT ✓	6.00	72.00
07	025	1630	M P ARIAS ✓	5.00	60.00
08	010	6833	E S KRAUS ✓	38.00	453.50
08	010	4419	W T BROMAGE ✓	40.00	480.00
08	010	7949	S P COOLEY ✓	50.00	600.00
08	010	0061	G S OVERSTROM	100.00	1140.00
08	010	1037	R H KRISEL ✓	50.00	600.00
08	010	3729	J A DALEY		540.00
08	010	6102	T F MULLANEY JR ✓	40.00	480.00
08	030	1302	R W DENNISON		40.00

COMPANY TOTALS

1887.58

22288.50

9 9 0 4 0 7 7 5 4 5 4

RUN DATE 11-23-87

RUN TIME 15:18:56

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CONNECTICUT NATIONAL TRUST COMPANY OF FLORIDA
725 COLORADO AVE STUART FL 33495-2317

PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	400	7797	R L RICE		12.48

COMPANY TOTALS

12.48

YTD 12/31 = 12.48

9 9 0 4 0 7 7 5 4 5 5

RUN DATE 11-23-87
COMPANY RPT DATE PP PAGE
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PAC REPORT

RUN TIME 15:18:56
CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	325	7139	J D CASALE	5.00	60.00
08	325	7683	T W EGAN	1.50	18.00
COMPANY TOTALS				6.50	78.00

YTD \leftarrow 36 = ~~68.00~~ 1.50

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PAC REPORT

RUN TIME 15:30:05
CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	004	2401	S F GOOGINS	10.00	10.00
00	024	9121	L P BEAUDOIN	2.00	2.00
00	030	4777	D W VALENTINE	4.00	4.00
00	039	5287	J M CONTI	2.50	2.50
00	047	9637	B L ZEBROMSKI	1.00	1.00
00	055	6613	R L EIGLER	5.00	5.00
00	090	3978	J Q HILLS	1.00	1.00
00	090	4157	N M FALLS	6.25	6.25
00	091	7419	J A QUIGLEY	7.00	7.00
00	091	8572	A L KNICELY	30.00	30.00
00	092	0317	K L SCHLEGEL	5.00	5.00
00	094	9512	J W LUX JR	2.00	2.00
00	101	1654	H M ZERFING II	1.25	1.25
00	109	1681	K A POLLACK	1.25	1.25
00	112	0562	R S CROSS	3.00	3.00
00	115	6842	J J CONLON JR	2.50	2.50
00	126	5261	D J MUDRY	.50	.50
00	141	2948	D GRAY	2.00	2.00
00	146	0913	J K SNEAD	1.25	1.25
00	160	3715	C A DELUCIA	3.00	3.00
00	165	4764	P J BASILE	8.00	8.00
00	166	9042	S L BIERNAT	4.00	4.00
00	169	9662	B FREIMUTH	3.00	3.00
00	192	9349	V B TIERNEY	1.50	1.50
00	202	4842	J J FULLANA	5.00	5.00

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 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	205	0642	J B DAYTON	5.00	5.00
00	205	5515	E F SHUGRUE	3.50	3.50
00	206	6791	C A HAYES	5.00	5.00
00	206	7960	L C DRAGOLI	2.50	2.50
00	208	6952	P J DENZA	5.00	5.00
00	208	7937	A N BEQUARY	36.00	36.00
00	210	7238	G G HORN	5.00	5.00
00	213	8813	N E FITZPATRICK JR	5.00	5.00
00	215	2294	S W BATES	10.00	10.00
00	217	7507	R J DEMAYO	10.00	10.00
00	226	1685	W C PARTINGTON	5.00	5.00
00	227	4834	R H GLODE	5.00	5.00
00	227	2865	J A DEIR	5.00	5.00
00	233	6953	G J MEEHAN	10.00	10.00
00	510	4597	R A OBRIEN	20.00	20.00
00	535	4410	M S CAVANAUGH	5.00	5.00
00	536	2522	B F VIVERITO	25.00	25.00
00	537	1747	M D FELLION	6.00	6.00
00	537	8267	J J BALD	5.00	5.00
00	540	0734	J P RAFFERTY	5.00	5.00
00	560	6136	J BODE	7.50	7.50
00	561	3715	P PIRROTTA	10.00	10.00
00	580	5327	B M BUDNICK	10.00	10.00
00	585	0464	J A WILDER	1.25	1.25
00	585	4618	S G NYSTROM	20.00	20.00

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BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
00	595	6671	D HEARD III	15.00	15.00
00	785	5924	G E RUSSELL JR	25.00	25.00
01	000	5406	E G CHIARAMONTE	40.00	40.00
01	001	9802	J R BERGER	25.00	25.00
01	005	1144	T D CRONEN	8.50	8.50
01	005	3791	W R MILLER	6.67	6.67
01	010	0509	R E GALIPO	20.00	20.00
01	010	7511	D DIX JR	10.00	10.00
01	010	0041	R G CHRISTENSEN	10.00	10.00
01	025	0612	J A DIGEL	3.00	3.00
01	025	8370	T E MCKINLAY	2.00	2.00
01	025	5820	J M RICHARDSON	20.00	20.00
01	025	5775	R P ENGVALL JR	4.00	4.00
01	025	5211	C N GIANOPULOS	2.00	2.00
01	030	3264	L A DUNLAP JR	10.00	10.00
01	030	7249	P J SPOSITO	10.00	10.00
01	030	9364	E C KERIN	2.00	2.00
01	035	1404	R L COLE	10.00	10.00
01	035	6759	M D GALVIN	8.50	8.50
01	035	9434	S C HOLAHAN	5.00	5.00
01	035	5752	B W MCCOLLUM	5.00	5.00
01	070	8387	J F SAVAGE III	20.00	20.00
01	080	1382	M C KRAMER	5.00	5.00
01	100	5632	W B SOPER II	35.00	35.00
01	150	0291	R ABEL JR	35.00	35.00

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RUN TIME 15:30:05
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

PAC REPORT

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
01	249	3499	N S ABEL	2.50	2.50
01	250	9905	D W GRIGLEY	20.00	20.00
01	250	0074	W P SOKOLOSKY	2.00	2.00
01	590	2820	J F MORKAN JR	5.00	5.00
01	590	9289	R G TRUB	25.00	25.00
01	595	2159	C J ZIRUK	5.00	5.00
01	600	0951	M S WALLACE	8.33	8.33
01	680	7791	K S DUBE	3.00	3.00
01	680	8324	S G OGREN	7.50	7.50
01	680	6266	R G COLEGROVE	5.00	5.00
01	750	7722	J R DUNN	30.00	30.00
01	751	3093	J F ABATE	5.00	5.00
01	751	6166	P TENNEY	5.00	5.00
01	980	1783	M B MESKILL	20.00	20.00
01	980	3862	R K OVALLE	5.00	5.00
01	980	6898	S VAN BATENBURG	5.00	5.00
01	989	0823	M G ROOT	5.00	5.00
02	001	0406	J J CARSELLA	10.00	10.00
02	001	8726	A J CICCHETTI	10.00	10.00
02	002	7859	J F BLAKE	10.00	10.00
02	008	1533	W L HARRINGTON JR	5.00	5.00
02	011	1288	J J SPEAR	10.00	10.00
02	020	8907	T B FAGAN	10.00	10.00
02	030	5089	F T PLEVA	5.00	5.00
02	511	3454	M E MCGUINNESS	4.00	4.00

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 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
02	511	0905	H O WARREN	3.00	3.00
02	528	3588	P J MCDEVITT JR	20.83	20.83
02	535	1806	P A FUDGE	2.50	2.50
02	560	4280	P HOMES	2.00	2.00
02	569	4699	P M POGGI	3.75	3.75
02	569	9766	R BERRY	6.00	6.00
02	575	6714	R A GUENTER	60.00	60.00
02	740	5631	R F LUX	2.00	2.00
02	832	3353	D CAREY	3.00	3.00
02	855	1333	M E MARKS	15.00	15.00
03	002	4361	R R FOSTER	25.00	25.00
03	010	1105	R J RANELLI	20.00	20.00
03	010	1004	R F POUND JR	20.00	20.00
03	025	2297	J A HINCKLEY	5.00	5.00
03	040	3929	C L HANNAH	1.00	1.00
03	080	7524	S A WESTALL	12.00	12.00
03	080	8835	S R WALKER	25.00	25.00
03	080	1704	J W ROSTON	20.00	20.00
03	115	7326	K T PELLETIER	4.00	4.00
03	115	8471	C C MANLEY	3.00	3.00
03	115	8721	J A GOODFELLOW	2.00	2.00
03	125	5751	G M BROPHY	6.00	6.00
03	144	5893	S I AUCOIN	1.25	1.25
03	162	3994	J C REED	2.00	2.00
03	215	5033	R J WERHLE JR.	2.50	2.50

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777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
03	228	5838	A S ALUSKA	2.00	2.00
03	228	7105	D E MATTHEWS	5.00	5.00
03	228	5807	M P DAMBRISI	5.00	5.00
03	240	4053	B F DIDAN	3.00	3.00
03	260	6268	F A BROWN	2.00	2.00
03	410	3560	G L DUROST	20.00	20.00
03	440	5138	R L ST PIERRE	2.00	2.00
03	460	2238	M A KOENIG	2.50	2.50
04	010	0509	F A LARSON	30.00	30.00
04	020	2635	A P BOECKLIN	10.00	10.00
04	030	3226	J P CARLEY	20.00	20.00
04	045	7141	J J MILLER	6.00	6.00
04	060	0074	J FISKE JR	5.00	5.00
04	080	5927	M E DEVINE	8.00	8.00
04	100	8197	R L AUGUST	3.00	3.00
04	125	8015	M H HOPKINS	1.00	1.00
04	125	2894	B R CALDER	6.25	6.25
04	126	5221	M PRIOR	3.00	3.00
04	126	2744	L HAMILTON	1.00	1.00
04	130	4591	J L DELUCIA JR	10.00	10.00
04	130	2974	W R LARENSEN JR	5.00	5.00
04	130	1387	M H VALLERA	.50	.50
04	160	2662	P R TRACEY	9.00	9.00
04	160	5150	G P AHRENS	5.00	5.00
04	160	4439	G W BISHOP	1.50	1.50

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RUN DATE 12-30-87
 COMPANY RPT DATE PP
 00600 PC 01-31-88 01

PAGE
 7

PAC REPORT

RUN TIME 15:30:05
 CONNECTICUT NATIONAL BANK
 777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
04	165	6011	N J CURRIE	10.00	10.00
04	165	6153	B J CUNNINGHAM	8.00	8.00
04	175	0832	A R JANN	7.50	7.50
04	210	0967	J M BIXLER	15.00	15.00
04	230	2572	N R BOUCHARD	20.00	20.00
04	230	8368	M L BISCARDI	10.00	10.00
05	030	9179	D M THORNEY	1.25	1.25
05	800	9190	J M HENDRICKSON	5.00	5.00
05	800	9806	J A KELLER	5.00	5.00
05	810	6779	P M DROUIN	8.00	8.00
05	820	3375	R S KOLLMEYER	2.50	2.50
05	820	1549	M R MCNAMARA	2.50	2.50
06	088	4419	W E KILPATRICK	.75	.75
06	088	4356	G J MURPHY	4.00	4.00
06	088	0385	J H HARRIGAN	10.00	10.00
06	088	2845	W E LOFGREN	20.00	20.00
06	225	4266	T CAHILL	30.00	30.00
06	240	7446	A J CAMPANELLI	40.00	40.00
06	250	3342	M SYDORIAK JR	6.00	6.00
06	250	1390	S M PROTO	5.00	5.00
06	250	1916	R F NOTASKY	3.50	3.50
06	250	2293	C O STRAUB	10.00	10.00
06	342	1415	D R MAROTTO	5.00	5.00
06	342	7540	J P CANTIN	2.50	2.50
06	560	5279	S T INGALLS SR	2.50	2.50

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RUN DATE 12-30-87

RUN TIME 15:30:05

COMPANY RPT DATE PP
00600 PC 01-31-88 01

PAGE
8

PAC REPORT

CONNECTICUT NATIONAL BANK
777 MAIN STREET HARTFORD CONNECTICUT 06115

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
06	560	2025	D F KANOFF	5.00	5.00
06	563	5161	W G KEELEY	5.00	5.00
06	563	4854	N D LEBRUN	1.25	1.25
06	563	1525	S L REYNOLDS	5.00	5.00
06	564	0321	R E DELL	5.00	5.00
06	720	8733	J A YOUNG	30.00	30.00
06	721	9332	S BURT	6.00	6.00
07	025	1630	M P ARIAS	5.00	5.00
08	010	6833	E S KRAUS	38.00	38.00
08	010	4419	W T BROMAGE	40.00	40.00
08	010	7949	S P COOLEY	50.00	50.00
08	010	0061	G S OVERSTROM	100.00	100.00
08	010	1037	R H KNISEL	50.00	50.00
08	010	3729	J A DALEY	75.00	75.00
08	010	6102	T F MULLANEY JR	40.00	40.00

COMPANY TOTALS

2019.50

2019.50

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RUN DATE 12-30-87
COMPANY RPT DATE PP PAGE
01100 PC 01-31-88 01 1

PAC REPORT

RUN TIME 15:30:07
CONNECTICUT NATIONAL MORTGAGE COMPANY
433 SOUTH MAIN ST WEST HARTFORD CT 06110

BR	DEPT	EMPL#	NAME	CURR.PAC	YTD PAC
08	330	7139	J D CASALE	5.00	5.00
08	350	7683	T W EGAN	1.50	1.50
COMPANY TOTALS				6.50	6.50

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF)
)
)

Hartford National Corporation)
Political Action Committee)
Gregory Miller, as Treasurer)
)
)

MUR 2806

Response to Interrogatories and
Request for Production of Documents

I, Gregory Miller, Treasurer of The Hartford National Corporation Political Action Committee ("Committee"), to the best of my knowledge and belief, make the following responses to the interrogatories and request for production of documents by the Federal Election Commission ("FEC"), and hereby incorporate these answers by reference into the Committee's response to the FEC's reason to believe findings.

INTERROGATORY NO. 1.

Please list the sources of any funds accepted and deposited into the non-federal account by the Committee which are not contributed through employee payroll deductions.

RESPONSE TO INTERROGATORY NO. 1

This interrogatory contains a mistaken premise that the Committee "accepts and deposits" funds into a non-federal account; it does not. The Committee does not maintain a non-federal account. The Committee's connected organization, the Hartford National Corporation ("Corporation"), maintains a non-federal account that accepts no deposits except contributions made through employee payroll deductions and individual checks.

INTERROGATORY NO. 2

Was the Committee's non-federal account used for anything besides funding the political action committee: If so, state the other activities.

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RESPONSE TO INTERROGATORY NO. 2.

See response to Interrogatory No. 1 regarding the premise of this question. The funds contained in the Corporation's non-federal account were used to make periodic campaign contributions to state and local political committees, party committees and candidate committees.

INTERROGATORY NO. 3

Were the employees expressly notified that employee contributions would be used in connection with federal elections? If so, please state how they were notified.

RESPONSE TO INTERROGATORY NO. 3

Yes. For preceding election cycles, employees were notified, in both written and oral communications, specifically by letters and by word-of-mouth explanations, of Committee activities.

INTERROGATORY NO. 4

Please provide copies of the solicitation documents given to the employees which encourage participation in the political action committee.

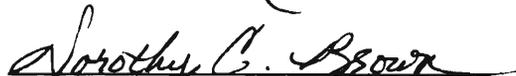
RESPONSE TO INTERROGATORY NO. 4

See attached documents.


Gregory Miller, Treasurer

Subscribed to and sworn before me this 16th day of March, 1989.

My commission expires: March 31, 1993


Notary Public

99040775467

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

Thomas F. Mullaney, Jr.
Executive Vice President

October 7, 1988

Dear fellow officer:

With the political season upon us I am writing to report on the work of our political action committee and to request that you consider contributing.

The PAC is part of our public affairs effort. Since banking is subject to considerable regulation and legislation, we like all other banks need to maintain strong working relations with legislators.

Tom Fagan manages our government affairs program, lobbies at the legislature, and is supported by professional lobbyists we retain. They are an effective team. But one critical part of their effort they cannot perform: contributing to the election of any official. By law all such contributions must be completely voluntary. It is illegal for a company to use corporate funds to contribute to a campaign.

During the year, but especially now, we contribute to the campaigns of legislators who support us on banking issues and to legislators in key positions. Most of the money is used at the state level; some is used in federal and city elections. We report annually on the disbursement of such funds and will gladly provide any employee with an accounting of how these contributions are spent.

Running for office has unfortunately become expensive, with printing and media costs being major absorbers of campaign budgets. We work very hard to maintain productive relations with legislators. In doing so we compete with other businesses and with groups opposed to banking and business interests generally.

If you have not participated in our PAC please consider doing so. You may use the enclosed form to make a one-time contribution or to have regular contributions deducted from your pay. We appreciate every boost we receive and try to use it wisely to advance our interests in a very competitive political climate.

Sincerely,



dks

4718s

99040775468

Connecticut National Bank

777 Main Street
Hartford, Connecticut 06115

Thomas F. Mullaney, Jr.
Senior Vice President

April 1, 1987

Dear Fellow Officer:

Last spring I wrote a letter similar to this one asking for your voluntary contribution to the Hartford National Corporation - Political Action Committee. Your response was good.

Contributions totaling \$45,026 were received during 1986 from 334 officers, many by means of payroll deduction. The increasingly broader participation was most gratifying. In 1985, 243 officers contributed \$24,788.

However, the requests for support have never been more numerous nor more imposing on our resources. And, the need to support our friends has never been greater as more and more of our corporate future appears to be affected by the State and federal legislative processes.

Therefore, I am asking you again to make a voluntary contribution to the HNC-PAC in the range, well in the range we hope, of the following suggested guidelines:

Officer	\$ 15 - 30
Assistant Vice President	\$ 30 - 60
Vice President	\$ 60 - 120
Senior Vice President	\$240 - 480

A payroll deduction form is included with this letter. Please use the payroll deduction method or, if you prefer, make a direct contribution to HNC - PAC. In either case, please send the completed form or your check to me at MSN 220.

Don't forget -- you may earmark your contribution to the candidates and party of your choice -- just let me know; there are no administrative charges to the PAC; all the funds go to candidates.

Thanks for your generosity and cooperation.

Sincerely,



P.S. You need not return the form to continue your present monthly deduction - only to increase it!

Enclosure

3410s

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AUGUST 3, 1983

PAC – A Political Opportunity

The Political Action Committee of Hartford National Corporation was formed in 1982 to accommodate increasing political campaign requests in an organized manner. The growing size and number of contribution requests was a result of the rising costs of political campaigns. The PAC structure also broadened the support of political activities that would further the Bank's interest in legislative matters.

The first contributions to PAC were made by Robert L. Newell, chairman and chief executive officer, and Joel B. Alvord, president and chief operating officer. General officers and senior officers were then solicited. This was later extended to include all officers.

Participation in the PAC is completely voluntary. "Although guidelines are used in the solicitation process, they are for general guidance only. The emphasis is on participation at whatever level an individual officer feels is appropriate," stated Thomas F. Mullaney, senior vice president and chairman of the PAC. He added that management does not

review the list of participants nor should there be any coercion or pressure imposed, intended, or interpreted. Contributions may be made by use of payroll deduction.

Most contributions to the PAC are unrestricted. However, individuals may direct the PAC to contribute their funds to candidates of their choice. Except for these directed contributions, PAC funds are distributed by a committee of bank officers.

In addition to Mullaney, other committee members are treasurer Kip Bergstrom, planning officer, Retail Planning; Nicki Brown, vice president, SFS, Landmark Square; Tom Cronen, assistant vice president, Bond & Money Market; Tom Theurkauf, planning officer, Financial Planning; and Alberto Ibarguen, vice president/deputy general counsel.

PAC funds can be contributed to political candidates or parties at the federal, state and local levels. These contributions are a matter of public record as reports are filed with both the federal and state election commissions.

1982 PAC DISTRIBUTIONS

Federal Elections

Senate

Lowell Weicker	(R)*	\$1,000
Toby Moffett	(D)	500

Congress

Neal Hanlon	(R)	200
Tony Guglielmo	(R)	150
Nancy Johnson	(R)	200
Larry DeNardis	(R)	150
Stewart McKinney	(R)	200
Barbara Kennelly	(D)	150
Brendan Kennedy	(D)*	100
Gardner Wright	(D)*	50

General

Connecticut Bankers Assn.		750
Democratic Nat'l Committee		300
Consumer Bankers Assn.		60

State Elections

Governor

William O'Neill	(D)*	\$1,575
Lew Rome	(R)*	975

Other State Offices

Henry Parker	(D)	500
Julia Taschian	(D)*	100
Joseph Lieberman	(D)	50

State Senate

Reg Smith	(R)	75
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Nan Streeter	(R)	150
Bill Sullivan	(D)	200
Richard Schneller	(D)	150
Gerald Roisman	(D)*	50
Steven Penney	(D)	100

State House of Representatives

Ken Rock	(D)*	\$ 100
Peter W. Rogan	(R)	200
Marilyn Roach	(R)	100
Jim Fleming	(R)	100
Steve Duffy	(D)	45
Tom Sweeney	(D)	75
Bob Gilligan	(D)	350
Kevin Johnston	(D)	150
Paul Esposito	(D)	100
Wayne Fox	(D)	100
Joe Broder	(R)	100
Carol Herskowitz	(R)	75
Chris Niedermeier	(D)*	100
Bob Farr	(R)	15
Anthony Tringlia	(D)	50
Mildred Freer	(R)	50

General

State GOP*		1,050
Old Saybrook Republican Town Committee		25
Berman for Probate Judge	(R)	50
Committee for Probate		

060 2208

MANATT, PHELPS, ROTHENBERG & PHILLIPS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

FAX (202) 463-4394

(202) 463-4385

LOS ANGELES

11385 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90064

(213) 212-4000

March 20, 1989

03 MAR 20 11:10:33

Sandra Dunham, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2806

Dear Ms. Dunham:

The MUR response filed on behalf of the Hartford National Corporation Political Action Committee inadvertently contained an unsigned signature page. Please substitute the enclosed signature page in that response.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Eric F. Kleinfeld
Manatt, Phelps, Rothenberg
and Phillips

Enclosure

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prohibitions and limitations of the Act, to make all of the transfers to the Committee. Third, even should the FEC determine that section 102.5(a) is applicable, the composition of the transfers as funds permissible under the Act, should mandate no further action. Since all funds could have been directly deposited into the Committee and then disbursed, no harm has occurred. Fourth, Hartford has changed its procedure to ensure that all contributions for federal purposes will be deposited into the Committee's account. Finally, Hartford's employees who participated in the payroll deduction plan were aware of the company's activities at the federal level.

Hartford believes that these reasons compel no further action in this MUR and urges the FEC to close its file. However, as available under FEC procedures, should the FEC disagree with the reasoning contained herein and decide not to close this matter, the Committee respectfully requests the opportunity to conciliate this matter prior to a determination of probable cause.

Dated: 3/17/89

Respectfully submitted,



William C. Oldaker
Eric F. Kleinfeld
MANATT, PHELPS,
ROTHENBERG & PHILLIPS
Suite 200
1200 New Hampshire Ave., N.W.
Washington, DC 20036
(202) 463-4300

Attachments

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In the Matter of)
)
Hartford National Corporation)
Political Action Committee)
Gregory M. Miller, as treasurer)

89 SEP 13 AM 10:33
MUR 2806

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated from a preliminary review of the 1987 Mid-Year and Year-End Reports, and the 1988 April Quarterly Report of the Hartford National Corporation Political Action Committee ("the Committee"). On January 11, 1989, the Commission found reason to believe that the Committee and Gregory Miller, as treasurer, had violated 11 C.F.R. § 102.5(a) by transferring \$9,200 to the Committee's federal account from its non-federal account. After extensions were requested and granted to the Respondents, this Office received their response on March 17, 1989, which included answers to the Commission's interrogatories and documents in response to the Commission's request.

(Attachment 1). The Respondents asked that no further action be taken and for the Commission to close the file or, in the alternative, that the Commission agree to pre-probable cause conciliation. The Respondents have repaid the entire amount to the non-federal account, reporting a repayment of \$1,700 on the 1988 October Quarterly Report, a repayment of \$2,300 on the 1988 Post-General Report, a repayment of \$3,150 on the 1988 Year-End Report, and a repayment of \$2,050 on the 1989 Mid-Year Report.

II. ANALYSIS

The Respondents argue that Section 102.5(a)(1) does not apply to the Committee because, while it does finance political

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activity in connection with federal elections, it does not finance political activity in connection with non-federal elections. The Committee claims that the financing of political activity in connection with non-federal elections is performed by the Hartford National Corporation ("the Corporation"), the Committee's connected organization, and that such financing is under the Corporation's direct oversight. Should the Commission determine that Section 102.5(a) is applicable, the Committee further argues that the transfers from the non-federal account were of funds permissible under the Act and that no further action should be taken as no harm has been done.

Pursuant to 11 C.F.R. § 102.5(a)(1), an organization which is a political committee under the Act, and which finances political activity in connection with both federal and non-federal elections, must establish separate accounts for federal and non-federal funds, and keep such accounts strictly segregated. Only funds subject to the prohibitions and limitations of the Act may be deposited in the federal account. No funds may be transferred from the non-federal account into the federal account.

The weight of the evidence in the present matter shows that in 1987 and 1988, the Committee did have a non-federal account, into which funds obtained through a payroll deduction program for the Corporation's employees were deposited, and from which funds were later transferred to the Committee's federal account. Copies of slips which were used to deposit the funds into the non-federal account are clearly labelled "Hartford National Corporation Political Action Committee State." In response to

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correspondence from the Reports Analysis Division ("RAD"), Gregory Miller wrote that employee payroll deductions were deposited into the State PAC, and then transferred to the Federal PAC.

Additionally, in its solicitations of employee involvement through payroll contributions the Corporation stated that the Committee funded political activity in both the federal and non-federal areas. To this end, a 1983 letter sent to Corporation employees asserted that "PAC funds can be contributed to political candidates or parties at the federal, state and local levels." (Attachment 1(85)). Likewise, a 1988 solicitation speaks solely of "[t]he PAC," and states that "[m]ost of the money is used at the state level; some is used in federal and city elections." (Attachment 1(83)).

Finally, an arrangement such as that suggested by the Respondents, where "[t]he funds contained in the Corporation's non-federal account were used to make periodic campaign contributions to state and local political committees, party committees, and candidate committees (emphasis added)," would appear to violate Connecticut law which prohibits business entities from contributing to a candidate's campaign, or from promoting the defeat of any candidate, or the success or defeat of any political party, without first establishing a separate political committee to do so. See Conn. Gen. Stat. Ann. § 9-3330o(a)-(b) (West 1987).

Taken together this evidence compels the conclusion that the Corporation set up the Committee as a separate political committee, with a federal account and a non-federal account, and

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that funds obtained through the Corporation's payroll deduction program were initially deposited into the non-federal account and subsequently transferred into the federal account. All such transfers would constitute violations of 11 C.F.R. § 102.5(a).

Nor is the Respondents' argument that all funds so transferred were permissible under the Act convincing. Under the Act, individual contributions to any one committee may not exceed \$5,000 per calendar year, and may not exceed an aggregate to all recipients of \$25,000 per calendar year. 2 U.S.C.

§ 441(a)(1) and (3). Additionally, contributions deposited in the federal account must have been designated for the federal account, must have resulted from a solicitation which expressly stated that the contributions would be used in connection with a federal election, and must have come from persons who were informed that all contributions are subject to the prohibitions and limitations of the Act. 11 C.F.R. § 102.5(a)(2)(i)-(iii).

While the Committee alleges that "[i]t is clear that none of [the] employees had reached their maximum federal contribution limit at the time of [the] payroll deductions, or, at the time of the transfer to the Committee," and it appears that this is true, it does not appear that the Respondents adequately complied with other requirements related to the solicitation of funds.

Although the Respondents claim that contributors were notified that their contributions "might be used for federal purposes," this falls short of the regulatory standard that requires a solicitation "which expressly stated that the contribution will be used in connection with a federal election" 11 C.F.R. § 102.5(a)(2)(ii) (emphasis added). As noted, supra, the most

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recent, 1988 solicitation letter states that most of the money contributed will be used for non-federal purposes. Also, none of the solicitation letters inform potential contributors that all contributions are subject to the prohibitions and limitations of the Act. Finally, there is nothing to suggest that any of the contributions were designated for the federal account. None of the solicitations informed potential contributors that they should so designate their contributions (although the 1983 letter did advise potential contributors that they could direct the PAC to contribute their funds to the candidate of an individual contributor's choice). The following schedule, which shows the date and amount of deposits into the non-federal account and the date and amount of transfers into the federal account, fails to demonstrate any correlation by which one could infer that amounts transferred were actually designated for the federal account:

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Date	Payroll Deposit	Date	Transfer	Transactional (deposit-transfer) Excess	Cumulative Excess
6-2-87	\$ 2,044.08	6-30-87	\$2,000	\$ 44.08	\$ 44.08
8-4-87	\$ 2,030.08	8-11-87	\$1,000	\$ 1,030.08	\$1,074.16
-	-0-	8-17-87	\$1,000	\$-1,000.00	\$ 74.16
9-2-87	\$ 1,964.08	9-29-87	\$ 700	\$ 1,264.08	\$1,338.24
11-3-87	\$ 1,896.08	-	-0-	\$ 1,896.08	\$3,234.32
12-2-87	\$ 1,894.08	12-8-87	\$3,500	\$-1,605.92	\$1,628.40
1-11-88	\$ 2,026.08	1-19-88	\$1,000	\$ 1,026.08	\$2,654.48
	<u>\$11,854.48</u>		<u>\$9,200</u>	<u>\$ 2,654.48</u>	<u>-</u>

Thus, contrary to the Respondents' contentions, funds transferred from the non-federal account to the federal account did not meet the requirements of 11 C.F.R. § 102.5(a)(2). As such, the error in transferring funds from the non-federal account to the federal account was not harmless.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with the Hartford National Corporation Political Action Committee and Gregory M. Miller, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Lawrence M. Noble
General Counsel

9/12/88
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Response to Reason to Believe
Finding and Answers to Interrogatories
and Request for Production of Documents
2. Proposed Conciliation Agreement and Letter

Staff Assigned: Anthony Buckley

99040775478

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hartford National Corporation) MUR 2806
Political Action Committee)
Gregory M. Miller, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 18, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2806:

1. Enter into conciliation with Hartford National Corporation Political Action Committee and Gregory M. Miller, as treasurer, prior to a finding of probable cause to believe, as recommended in the General Counsel's Report dated September 12, 1989.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report dated September 12, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

9-18-89
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wednesday, September 13, 1989 10:33 a.m.
Circulated to the Commission: Wednesday, September 13, 1989 4:00 p.m.
Deadline for vote: Friday, September 15, 1989 4:00 p.m.
At the time of deadline, 4 affirmative votes had not been received.
Final vote received: Wednesday, September 18, 1989 12:06 a.m.

99040775474



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 21, 1989

Eric F. Kleinfeld, Esquire
Manatt, Phelps, Rothenberg
and Phillips
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036

RE: MUR 2806
Hartford National
Corporation Political
Action Committee and
Gregory Miller, as
treasurer

Dear Mr. Kleinfeld:

On January 11, 1989, the Federal Election Commission found reason to believe that the Hartford National Corporation Political Action Committee and Gregory Miller, as treasurer, violated 11 C.F.R. § 102.5(a). At your request, on September 18, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement,

99040715490

Eric F. Kleinfeld
Page 2

please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

99040775481

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hartford National Corporation)
Political Action Committee and) MUR 2806
Gregory M. Miller, as treasurer)
)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Eric F. Kleinfeld, the attorney for the Hartford National Corporation Political Action Committee and Gregory M. Miller, as treasurer, pertaining to a violation of 11 C.F.R. § 102.5(a). (Attachment 1).

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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Hartford National Corporation and Gregory M. Miller, as treasurer.
2. Close the file.
3. Approve the attached letter.

Lawrence M. Noble
General Counsel

11-21-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

Staff Assigned: A. Buckley

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hartford National Corporation) MUR 2806
Political Action Committee and)
Gregory M. Miller, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 27, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2806:

1. Accept the conciliation agreement with the Hartford National Corporation and Gregory M. Miller, as treasurer, as recommended in the General Counsel's Report dated November 21, 1989.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's Report dated November 21, 1989.

Commissioners Aikens, Elliott, Josefiak, McGarry and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

11-28-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, November 21, 1989 4:04 p.m.
Circulated to the Commission: Wednesday, November 22, 1989 11:00 a.m.
Deadline for vote: Monday, November 27, 1989 11:00 a.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 16, 1990

Eric F. Kleinfeld, Esq.
Manatt, Phelps, Rothenberg & Phillips
1200 New Hampshire Avenue, N.W.
Suite 200
Washington, D.C. 20036

MUR 2806
Hartford National Corporation
Political Action Committee and
Gregory M. Miller, as treasurer

Dear Mr. Kleinfeld:

On November 27, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 11 C.F.R. § 102.5(a). Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Anthony Buckley, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

99040775483

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Hartford National Corporation) MUR 2806
Political Action Committee)
Gregory M. Miller, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Hartford National Corporation Political Action Committee and Gregory Miller, as treasurer ("Respondents"), violated 11 C.F.R. §102.5(a).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. §437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Hartford National Corporation Political Action Committee is a political committee within the meaning of 2 U.S.C. §431(4).

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2. Gregory Miller is the treasurer of the Hartford National Corporation Political Action Committee.

3. Pursuant to 11 C.F.R. §102.5(a)(1)(i) of the Commission's regulations, a political committee may not transfer funds from its non-federal account to its federal account.

4. On June 30, 1987; August 11, 1987; August 17, 1987; September 29, 1987; December 8, 1987; and January 19, 1988, the Hartford National Corporation Political Action Committee transferred funds with an aggregate total of \$9,200 from its non-federal account to its federal account.

5. All funds transferred were composed of individual contributions derived through an employee payroll deduction plan, not corporate funds. However, in good faith and prior to the commencement of this matter, respondents refunded the entire amount of the transfers to the non-federal account, reporting a repayment of \$1,700 on their 1988 October Quarterly Report, a repayment of \$2,300 on their 1988 Post-General Report, a repayment of \$3,150 on their 1988 Year-End Report, and a repayment of \$2,050 on their 1989 Mid-Year Report.

V. Respondents transferred funds from its non-federal account to its federal account, in violation of 11 C.F.R. §102.5(a)(1)(i).

VI. Respondents contend that they did not knowingly and willfully violate 11 C.F.R. §102.5(a)(1)(i) of the Commission's regulations.

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VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Two Hundred dollars (\$1,200.00), pursuant to 2 U.S.C. §437g(a)(5)(A).

VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than 30 days from the date of this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:



Lois G. Lerner
Associate General Counsel

Date

1/12/90

FOR THE RESPONDENTS:



Eric F. Kleinfeld
Attorney for Respondents

Date

11-13-89

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2806

DATE FILMED 4/24/90 CAMERA NO. 3

CAMERAMAN AS

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