



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1393

DATE SCANNED 8/16/05

SCANNER NO. 1

SCAN OPERATOR S.E.G.

25092580549

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
May 3, 2005

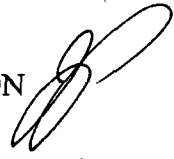



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463
2005 MAY -4 A 9: 06


SENSITIVE

MEMORANDUM

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR 

ROBERT J. COSTA 
DEPUTY STAFF DIRECTOR

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION – FRIENDS OF
CHRIS DODD 2004 - FAILURE TO FILE A 48-HOUR NOTICE
UNDER THE ADMINISTRATIVE FINE PROGRAM

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000 or more received from the close of books for the 12 Day Pre-General Report up to 48 hours before the November 2, 2004 General Election in accordance with 2 U.S.C. 434(a)(6) and 11 C.F.R. § 104.5(f). The Friends of Chris Dodd 2004 committee represents a candidate who won the Connecticut General Election and failed to file 48-hour notices for contributions totaling \$53,000.00.

On September 27, 2004, Prior Notice was sent to the committee which included a section detailing the requirements for filing 48-hour notices. The section read as follows:

“Notices are required if the committee receives contributions (**including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of loans to the candidate or committee**) of \$1,000 or more, during the period of October 14 through October 30, 2004. The notices must reach the appropriate federal and state filing offices within 48 hours of the committee’s receipt of the contribution(s).”

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per, 11 C.F.R § 104.5(f).

25092580550

We have attached information sheet which includes the name, date of receipt and amount of the contribution for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 C.F.R. §111.44, this committee should be assessed the civil money penalty so indicated.

Recommendation

1. Find reason to believe that Friends of Chris Dodd 2004 and Frank Zullo, Treasurer, violated 2 U.S.C. 434(a)(6) and make a preliminary determination that a civil money penalty of \$6,300.00 be assessed.
2. Send the appropriate mailgram.

Attachment

25092580551

Contributions for Which a 48-Hour Notice Was Not Received

AF 1393

Committee ID: C00347310

Committee Name: Friends of Chris Dodd 2004

Report Type: 20 Day Post General (10/14/04-11/22/04)

48-Hour Reporting Period: 10/14/04-10/30/04

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>
BCTGM International Union PAC	10/14/2004	\$1,000.00
Oracle Corporation PAC	10/15/2004	\$1,000.00
National Rural Letter Carriers PAC	10/15/2004	\$1,000.00
American Postal Workers PAC	10/15/2004	\$5,000.00
Charrisse Kaplan	10/15/2004	\$2,000.00
Jacques Dubois	10/15/2004	\$1,000.00
Robert Rich	10/15/2004	\$1,000.00
Health Net PAC	10/17/2004	\$5,000.00
Engineered Support Systems Inc. PAC	10/17/2004	\$1,000.00
H PAC	10/17/2004	\$1,500.00
Jane Weitzman	10/17/2004	\$1,000.00
Hall PAC	10/18/2004	\$1,000.00
Chad McCollam	10/18/2004	\$1,000.00
Ann Sheffer	10/18/2004	\$1,000.00
Clifton Robbins	10/18/2004	\$1,000.00
Lee Neibart	10/18/2004	\$1,000.00
Lee Greenberg	10/18/2004	\$1,000.00
Anne Phillips	10/19/2004	\$1,000.00
Howard Finkelstein	10/19/2004	\$1,000.00
Richard Lund	10/19/2004	\$1,000.00
Michael Kassen	10/19/2004	\$1,000.00
Career College Association PAC	10/20/2004	\$1,000.00
Walter Harrison	10/20/2004	\$1,000.00
Yvette Rose	10/20/2004	\$2,000.00
Arthur Shulman	10/20/2004	\$1,000.00
Andres Kissel	10/20/2004	\$1,000.00
Kenneth Schwartz	10/20/2004	\$1,000.00
George Landress	10/20/2004	\$1,000.00
Qualcomm, Inc. PAC	10/21/2004	\$1,500.00
JAZZ PAC	10/21/2004	\$2,000.00
Nancy Riordan	10/21/2004	\$2,000.00
Ray Kogovsek	10/21/2004	\$1,000.00
David Boies	10/26/2004	\$1,000.00
Akin, Gump, Strauss PAC	10/27/2004	\$1,000.00
John Rowe	10/27/2004	\$1,000.00
Ronald Williams	10/27/2004	\$1,000.00
Timothy Holt	10/27/2004	\$1,000.00
Committee Letter Carriers PAC	10/28/2004	\$3,000.00
	Total	\$53,000.00

Proposed Civil Money Penalty: \$6,300.00

25092580552



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Wednesday, May 04, 2005 11:00

BALLOT DEADLINE: Monday, May 09, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: **Reason to Believe Recommendation – Friends of Chris Dodd
2004 - Failure to File 48-Hour Notice under the Administrative Fine
Program. Memorandum from the Assistant Staff Director Reports
Analysis Division dated May 3, 2005.**

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I approve the recommendations except those following
to which I object (please insert AF#)

- () I approve the recommendations except those following
in which I abstain (please insert AF#)

- () I approve the recommendations except those following
in which I am recused (please insert AF#)

- () I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

25092580553

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Reason to Believe Recommendation -) AF #1393
 Friends of Chris Dodd 2004 - Failure to)
 File 48-Hour Notice under the)
 Administrative Fine Program)

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on May 09, 2005, the Commission decided by a vote of 6-0 to take the following actions in AF #1393:

1. Find reason to believe that Friends of Chris Dodd 2004 and Frank Zullo, Treasurer, violated 2 U.S.C. 434(a)(6) and make a preliminary determination that a civil money penalty of \$6,300.00 be assessed.
2. Send the appropriate mailgram.

Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for the decision.

Attest:

May 9, 2005
 Date

Mary W. Dove
 Mary W. Dove
 Secretary of the Commission

25092580554


**WESTERN
UNION.**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF CMGM

TO: FRANK ZULLO
 FRIENDS OF CHRIS DODD 2004
 PO BOX 270701
 WEST HARTFORD CT 06127-0701

FEDERAL ELECTION COMMISSION
 DAYNA BROWN
 999 E ST NW # 709
 WASHINGTON DC 20463

MAY 10, 2005

FRANK ZULLO
 FRIENDS OF CHRIS DODD 2004
 P.O. BOX 270701
 WEST HARTFORD, CT 06127

C00347310
 AF# 1393

DEAR FRANK ZULLO,

THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED ("THE ACT"), REQUIRES PRINCIPAL CAMPAIGN COMMITTEES OF CANDIDATES FOR FEDERAL OFFICE TO NOTIFY IN WRITING EITHER THE SECRETARY OF THE SENATE OR THE FEDERAL ELECTION COMMISSION ("FEC"), AND THE SECRETARY OF STATE, AS APPROPRIATE, OF ANY CONTRIBUTION OF \$1,000 OR MORE, RECEIVED BY ANY AUTHORIZED COMMITTEE OF THE CANDIDATE AFTER THE 20TH DAY, BUT MORE THAN 48 HOURS BEFORE, ANY ELECTION. THE ACT FURTHER REQUIRES NOTIFICATION TO BE MADE WITHIN 48 HOURS AFTER THE RECEIPT OF THE CONTRIBUTION AND TO INCLUDE THE NAME OF THE CANDIDATE AND OFFICE SOUGHT, THE DATE OF RECEIPT, THE AMOUNT OF THE CONTRIBUTION, AND THE IDENTIFICATION OF THE CONTRIBUTOR. THE NOTIFICATION OF THESE CONTRIBUTIONS SHALL BE IN ADDITION TO ALL OTHER REPORTING REQUIREMENTS. 2 U.S.C. 434(A). YOU WERE PREVIOUSLY NOTIFIED OF THE REQUIREMENT TO FILE THESE NOTICES. RECORDS AT THE FEC INDICATE THAT YOU DID NOT SUBMIT 48-HOUR NOTICES FOR CONTRIBUTIONS OF \$1,000 OR MORE, RECEIVED BETWEEN 10/14/2004 AND 10/30/2004, TOTALING \$53000.

THE ACT WAS FURTHER AMENDED IN 1999 TO PERMIT THE FEC TO IMPOSE CIVIL MONEY PENALTIES FOR VIOLATIONS OF THE REPORTING REQUIREMENTS OF 2 U.S.C. 434(A). 2 U.S.C. 437G(A)(4). ON 05/09/2005, THE FEC FOUND THAT THERE IS REASON TO BELIEVE ("RTB") THAT FRIENDS OF CHRIS DODD 2004 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) BY FAILING TO FILE THE 48-HOUR NOTICES. BASED ON THE FEC'S SCHEDULE OF CIVIL MONEY PENALTIES AT 11 C.F.R. 111.44, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE IS \$6300. SEND YOUR PAYMENT BY 06/18/2005. THE AMOUNT OF THE CIVIL MONEY PENALTY IS \$100 FOR EACH NON-FILED NOTICE PLUS 10 PERCENT OF THE DOLLAR AMOUNT OF THE


**WESTERN
UNION®**
WESTERN UNION COMMERCIAL SERVICES

CONTRIBUTIONS NOT TIMELY REPORTED. THE CIVIL MONEY PENALTY INCREASES BY 25 PERCENT FOR EACH PRIOR VIOLATION.

TO PAY THE CALCULATED CIVIL MONEY PENALTY

TO PAY THE CALCULATED CIVIL MONEY PENALTY, SEND THE ENCLOSED REMITTANCE AND YOUR PAYMENT TO THE FEC AT THE ADDRESS ON PAGE THREE. UPON RECEIPT OF THE REMITTANCE AND PAYMENT, THE FEC WILL SEND YOU A FINAL DETERMINATION LETTER.

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY

TO CHALLENGE THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY, YOU MUST SUBMIT A WRITTEN RESPONSE TO THE FEC'S OFFICE OF ADMINISTRATIVE REVIEW, 999 E STREET, NW, WASHINGTON, DC 20463. YOUR RESPONSE MUST BE RECEIVED BY 06/18/2005. YOUR WRITTEN RESPONSE MUST INCLUDE THE REASON(S) WHY YOU ARE CHALLENGING THE RTB FINDING AND/OR CALCULATED CIVIL MONEY PENALTY. THE FEC WILL ONLY CONSIDER CHALLENGES THAT ARE BASED ON A FACTUAL ERROR, MISCALCULATION OF THE CALCULATED CIVIL MONEY PENALTY BY THE FEC, OR THE EXISTENCE OF EXTRAORDINARY CIRCUMSTANCES THAT PERSISTED FOR MORE THAN 48 HOURS THAT WERE BEYOND YOUR CONTROL AND PREVENTED YOU FROM FILING THE 48-HOUR NOTICE(S) IN A TIMELY MANNER. YOUR RESPONSE MUST INCLUDE THE FACTUAL BASIS SUPPORTING THE REASON(S) AND SUPPORTING DOCUMENTATION. THE FEC STRONGLY ENCOURAGES THAT DOCUMENTS BE SUBMITTED IN THE FORM OF AFFIDAVITS OR DECLARATIONS. EXAMPLES OF CIRCUMSTANCES THAT WILL NOT BE CONSIDERED EXTRAORDINARY INCLUDE, BUT ARE NOT LIMITED TO, NEGLIGENCE, PROBLEMS WITH VENDORS OR CONTRACTORS, STAFF ILLNESS, COMPUTER FAILURES AND SIMILAR CIRCUMSTANCES. 11 C.F.R. 111.35(B)(1)(III) AND (4).

YOUR FAILURE TO RAISE AN ARGUMENT IN A TIMELY FASHION DURING THE ADMINISTRATIVE PROCESS SHALL BE DEEMED A WAIVER OF YOUR RIGHT TO PRESENT SUCH ARGUMENT IN A PETITION TO THE DISTRICT COURT UNDER 2 U.S.C. 437G. 11 C.F.R. 111.38.

IF YOU INTEND TO BE REPRESENTED BY COUNSEL, PLEASE ADVISE THE OFFICE OF ADMINISTRATIVE REVIEW. YOU SHOULD PROVIDE, IN WRITING, THE NAME, ADDRESS AND TELEPHONE NUMBER OF YOUR COUNSEL AND AUTHORIZE COUNSEL TO RECEIVE NOTIFICATIONS AND COMMUNICATIONS RELATING TO THIS CHALLENGE AND IMPOSITION OF THE CALCULATED CIVIL MONEY PENALTY.

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A CHALLENGE

IF YOU DO NOT PAY THE CALCULATED CIVIL MONEY PENALTY OR SUBMIT A WRITTEN RESPONSE, THE FEC WILL ASSUME THAT THE PRECEDING FACTUAL ALLEGATIONS ARE TRUE AND MAKE A FINAL DETERMINATION THAT FRIENDS OF CHRIS DODD 2004 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) AND ASSESS A CIVIL MONEY PENALTY.

UNPAID CIVIL MONEY PENALTIES ASSESSED THROUGH THE ADMINISTRATIVE FINE REGULATIONS WILL BE SUBJECT TO THE DEBT COLLECTION ACT OF 1982 ("DCA") AS AMENDED BY THE DEBT COLLECTION IMPROVEMENT ACT OF 1996, 31 U.S.C. 3701 ET SEQ. THE FEC MAY TAKE ANY AND ALL APPROPRIATE ACTION AUTHORIZED AND REQUIRED BY THE DCA, AS AMENDED, INCLUDING



WESTERN UNION COMMERCIAL SERVICES

TRANSFER TO THE U.S. DEPARTMENT OF THE TREASURY FOR COLLECTION. 11 C.F.R. 111.45.

THIS MATTER WAS GENERATED BASED ON INFORMATION ASCERTAINED BY THE FEC IN THE NORMAL COURSE OF CARRYING OUT ITS SUPERVISORY RESPONSIBILITIES. 2 U.S.C. 437G(A)(2). IT WILL REMAIN CONFIDENTIAL IN ACCORDANCE WITH 2 U.S.C. 437G(A)(4)(B) AND 437G(A)(12)(A) UNTIL IT IS PLACED ON THE PUBLIC RECORD IN ACCORDANCE WITH 11 C.F.R. 111.42 UNLESS YOU NOTIFY THE FEC IN WRITING THAT YOU WISH THE MATTER TO BE MADE PUBLIC.

ADDITIONAL INFORMATION ON THE FEC'S ADMINISTRATIVE FINE PROGRAM, INCLUDING THE FINAL REGULATIONS, IS LOCATED AT THE FEC'S WEBSITE AT WWW.FEC.GOV. IF YOU HAVE QUESTIONS REGARDING THE PAYMENT OF THE CALCULATED CIVIL MONEY PENALTY, PLEASE CONTACT DAYNA BROWN IN THE REPORTS ANALYSIS DIVISION AT OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130. IF YOU HAVE QUESTIONS REGARDING THE SUBMISSION OF A CHALLENGE, PLEASE CONTACT THE OFFICE OF ADMINISTRATIVE REVIEW AT OUR TOLL FREE NUMBER (800)424-9530 (PRESS 0, THEN EXT. 1660) OR (202)694-1660.

SINCERELY,

SCOTT E. THOMAS
CHAIRMAN

25092580557

* * * * *
ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.44, THE AMOUNT OF YOUR CIVIL MONEY PENALTY CALCULATED AT RTB IS \$6300

PLEASE MAIL THIS REMITTANCE WITH A CHECK OR MONEY ORDER MADE PAYABLE TO THE FEDERAL ELECTION COMMISSION TO THE FOLLOWING ADDRESS:

FEDERAL ELECTION COMMISSION
P. O. BOX 952182
ST. LOUIS, MO 63195-2182

IF YOU CHOOSE TO SEND YOUR REMITTANCE AND PAYMENT BY COURIER OR OVERNIGHT DELIVERY, PLEASE USE THIS ADDRESS:

U.S. BANK - GOVERNMENT LOCKBOX
FEC #952182
1005 CONVENTION PLAZA
ST. LOUIS, MO 63101

SEND YOUR REMITTANCE AND YOUR PAYMENT BY 06/18/2005. UPON RECEIPT OF YOUR REMITTANCE AND PAYMENT, THE COMMISSION WILL SEND YOU A LETTER OF FINAL DETERMINATION.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT


 WESTERN
UNION.

WESTERN UNION COMMERCIAL SERVICES

FOR: FRIENDS OF CHRIS DODD 2004

FEC ID#: C00347310

AF#: 1393

PAYMENT DATE: 06/18/2005

PAYMENT AMOUNT DUE: \$6300

CONTRIBUTOR	DATE	AMOUNT
BCTGM INTERNATIONAL UNION PAC	10/14/2004	
\$1,000.00		
ORACLE CORPORATION PAC	10/15/2004	
\$1,000.00		
NATIONAL RURAL LETTER CARRIERS PAC	10/15/2004	
\$1,000.00		
AMERICAN POSTAL WORKERS PAC	10/15/2004	
\$5,000.00		
CHARRISSE KAPLAN	10/15/2004	
\$2,000.00		
JACQUES DUBOIS	10/15/2004	
\$1,000.00		
ROBERT RICH	10/15/2004	
\$1,000.00		
HEALTH NET PAC	10/17/2004	
\$5,000.00		
ENGINEERED SUPPORT SYSTEMS INC. PAC	10/17/2004	
\$1,000.00		
H PAC	10/17/2004	
\$1,500.00		
JANE WEITZMAN	10/17/2004	
\$1,000.00		
HALL PAC	10/18/2004	
\$1,000.00		
CHAD MCCOLLAM	10/18/2004	
\$1,000.00		
ANN SHEFFER	10/18/2004	
\$1,000.00		
CLIFTON ROBBINS	10/18/2004	
\$1,000.00		
LEE NEIBART	10/18/2004	
\$1,000.00		


 WESTERN
UNION.

WESTERN UNION COMMERCIAL SERVICES

LEE GREENBERG	10/18/2004
\$1,000.00	
ANNE PHILLIPS	10/19/2004
\$1,000.00	
HOWARD FINKELSTEIN	10/19/2004
\$1,000.00	
RICHARD LUND	10/19/2004
\$1,000.00	
MICHAEL KASSEN	10/19/2004
\$1,000.00	
CAREER COLLEGE ASSOCIATION PAC	10/20/2004
\$1,000.00	
WALTER HARRISON	10/20/2004
\$1,000.00	
YVETTE ROSE	10/20/2004
\$2,000.00	
ARTHUR SHULMAN	10/20/2004
\$1,000.00	
ANDRES KISSEL	10/20/2004
\$1,000.00	
KENNETH SCHWARTZ	10/20/2004
\$1,000.00	
GEORGE LANDRESS	10/20/2004
\$1,000.00	
QUALCOMM, INC. PAC	10/21/2004
\$1,500.00	
JAZZ PAC	10/21/2004
\$2,000.00	
NANCY RIORDAN	10/21/2004
\$2,000.00	
RAY KOGOVSEK	10/21/2004
\$1,000.00	
DAVID BOIES	10/26/2004
\$1,000.00	
AKIN, GUMP, STRAUSS PAC	10/27/2004
\$1,000.00	
JOHN ROWE	10/27/2004
\$1,000.00	
RONALD WILLIAMS	10/27/2004
\$1,000.00	
TIMOTHY HOLT	10/27/2004
\$1,000.00	
COMMITTEE LETTER CARRIERS PAC	10/28/2004
\$3,000.00	

25092580559



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2005 JUN 27 A 9:27

June 24, 2005

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR *[Signature]*
ROBERT J. COSTA *[Signature]*
DEPUTY STAFF DIRECTOR

FROM: JOHN D. GIBSON *[Signature]*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: ADMINISTRATIVE FINES FINAL DETERMINATION
RECOMMENDATION- FRIENDS OF CHRIS DODD 2004 FOR
FAILURE TO FILE 48-HOUR NOTICES

Attached is the name of a principal campaign committee, Friends of Chris Dodd 2004, and its treasurer against which the Commission has found reason to believe (RTB) and assessed a proposed civil money penalty calculated at RTB for failure to file 48-hour notices for the 2004 General Election. The committee failed to provide 48-hour notices for contributions which totaled \$53,000.00. The committee paid the civil money penalty of \$6,300.00 on June 14, 2005.

In accordance with 11 CFR 111.34, the Commission shall send a final determination notice to a respondent that has paid the civil money penalty.

RAD Recommendation

- (1) Make a final determination that the political committee and its treasurer on the attached report violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated.
- (2) Send the appropriate mailgram.

25092580560

25092580561

DATE 06/24/2005
PAGE: 1

FEDERAL ELECTION COMMISSION 2005-2006
FINAL DETERMINATION CIRCULATION REPORT
PAID

AF #	COMMITTEE NAME	RECEIPT DATE	DAYS LATE	REASON TO BELIEVE DATE	COMMITTEE ID	TREASURER	STATE	PREVIOUS VIOLATIONS	REPORT TYPE	DATE PAID	AMOUNT PAID
------	----------------	--------------	-----------	------------------------	--------------	-----------	-------	---------------------	-------------	-----------	-------------

AF1393	FRIENDS OF CHRIS DODD 2004	12/02/2004		Not Filed	C00347310	FRANK ZULLO	CT	0	2004 48 HOUR NOTIFICATION	06/14/2005	\$6,300
--------	----------------------------	------------	--	-----------	-----------	-------------	----	---	---------------------------	------------	---------

\$0

\$6,300



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME TRANSMITTED: Monday, June 27, 2005 11:00

RETURN TO COMMISSION SECRETARY BY: Thursday, June 30, 2005 4:00

COMMISSIONER: MASON, McDONALD, SMITH, THOMAS, TONER, WEINTRAUB

SUBJECT: **Administrative Fines Determination Recommendation – Friends of Chris Dood 2004 For Failure to File 48-Hour Notices. Memorandum from the Assistant Staff Director, Reports Analysis Division dated June 24, 2005.**

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I approve the recommendations except those following to which I object (please insert AF#)

- () I approve the recommendations except those following in which I abstain (please insert AF#)

- () I approve the recommendations except those following in which I am recused (please insert AF#)

- () I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

DATE: _____ SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

25092580562

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Administrative Fines Final Determination) AF 1393
 Recommendation - Friends of Chris)
 Dodd 2004 For Failure To File 48-Hour)
 Notices.)

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on July 01, 2005, the Commission decided by a vote of 6-0 to take the following actions in AF 1393:

1. Make a final determination that Friends of Chris Dodd and Christopher Dodd, as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty of \$6,300.
2. Send the appropriate mailgram.

Commissioners Mason, McDonald, Smith, Thomas, Toner, and Weintraub voted affirmatively for decision.

Attest:

July 1, 2005
 Date

Mary W. Dove
 Mary W. Dove
 Secretary of the Commission

25092580563


**WESTERN
UNION®**

WESTERN UNION COMMERCIAL SERVICES

CONFIRMATION OF MAILGRAM TO: FRANK ZULLO
 FRIENDS OF CHRIS DODD 2004
 PO BOX 270701
 WEST HARTFORD CT 06127-0701

FEDERAL ELECTION COMMISSION
 TODD GARLAND
 999 E ST NW # 709
 WASHINGTON DC 20463

JULY 1, 2005

FRANK ZULLO
 FRIENDS OF CHRIS DODD 2004
 P.O. BOX 270701
 WEST HARTFORD, CT 06127

C00347310
 AF#: 1393

DEAR FRANK ZULLO:

ON 05/10/2005, THE FEDERAL ELECTION COMMISSION ("THE COMMISSION") FOUND REASON TO BELIEVE ("RTB") THAT FRIENDS OF CHRIS DODD 2004 AND YOU, AS TREASURER, VIOLATED 2 U.S.C. 434(A) FOR FAILING TO FILE 48-HOUR NOTICES FOR CONTRIBUTIONS OF \$1,000 OR MORE, RECEIVED BETWEEN 10/14/2004 AND 10/30/2004, TOTALING \$53,000. BY MAILGRAM DATED 05/10/2005, THE COMMISSION SENT YOU NOTIFICATION OF THE RTB FINDING THAT INCLUDED A CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE OF \$6,300 IN ACCORDANCE WITH THE SCHEDULE OF PENALTIES AT 11 C.F.R. 111.44.

ON 06/14/2005, THE COMMISSION RECEIVED PAYMENT OF YOUR CIVIL MONEY PENALTY CALCULATED AT THE RTB STAGE. THEREFORE, THE COMMISSION MADE A FINAL DETERMINATION ON 07/01/2005 THAT YOU, AS TREASURER, AND FRIENDS OF CHRIS DODD 2004 VIOLATED 2 U.S.C. 434(A), ASSESSED A CIVIL MONEY PENALTY IN THE AMOUNT OF \$6,300 IN ACCORDANCE WITH 11 C.F.R. 111.44, AND VOTED TO CLOSE THE FILE.

THE CONFIDENTIALITY PROVISIONS AT 2 U.S.C. 437G(A)(12) NO LONGER APPLY AND THIS MATTER IS NOW PUBLIC. THE FILE WILL BE MADE A PART OF THE PUBLIC RECORD PURSUANT TO 11 C.F.R. 111.42(B). ALTHOUGH THE FILE MUST BE PLACED ON THE PUBLIC RECORD WITHIN THIRTY (30) DAYS FROM THE DATE OF THE COMMISSION NOTIFICATION, THIS COULD OCCUR AT ANYTIME FOLLOWING CERTIFICATION OF THE COMMISSION VOTE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT DAYNA BROWN ON OUR TOLL FREE NUMBER (800)424-9530 (AT THE PROMPT, PRESS 5) OR (202)694-1130.

SINCERELY,
 SCOTT E. THOMAS
 CHAIRMAN

25092580564



receipt of your remittance and payment, the Commission will send you a letter of final determination.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Friends of Chris Dodd 2004

FEC ID#: C00347310

AF#: 1393

PAYMENT DATE: 06/18/2005

PAYMENT AMOUNT DUE: \$6300

QUALITY IS OUR PRIORITY FOR LOCKBOX 2182
SEQ# 001 \$ 0000630000 BA# 1 06-14-05 20 9

25092580565



FRIENDS OF CHRIS DODD FEC #C00347310		WEBSTER BANK WATERBURY, CT 06702 61-7010/2111	41035
Six thousand Three hundred dollars and 00 cents		DATE 05/16/2005	AMOUNT \$6,300.00
PAY TO THE ORDER OF:	Federal Election Commission P.O. Box 952182 Saint Louis, MO 63195-2182	FRIENDS OF CHRIS DODD <i>Kathy J. Darnat</i> AUTHORIZED SIGNATURE	

Security feature. Details on back.



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1393

DATE SCANNED 8/16/05

SCANNER NO. 1

SCAN OPERATOR S-E-G

25092580566