



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

MEMORANDUM

March 8, 2006

TO: The Commission

THROUGH: Robert J. Costa 
Acting Staff Director

FROM: Allan D. Silberman 
Director, ADR Office

BY: Lynn M. Fraser 
Assistant Director, ADR Office

SUBJECT: ADR 313 CT Democratic State Central Committee and
Emma Pierce, Treasurer,
Recommendation to Assign Case

On February 21, 2006, the ADR Office received RR 05L-67 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR and recommend that it be assigned to the ADR Office.

SUMMARY: RAD referred the CT Democratic State Central Committee and Emma Pierce, Treasurer, ("Respondents" or the "Committee") for failing to disclose all financial activity on their 2004 August Monthly Report. Specifically, Respondents failed to disclose \$76,200 in additional receipts. The Committee, in its original 2004 August Monthly Report, filed on August 20, 2004, disclosed \$0 from Itemized Contributions from Individuals/Persons Other than Political Committees, \$0 from Transfers from Affiliated/Other Party Committees, and \$0 from Offsets to Operating Expenditures on the detailed summary page. Respondents filed an amended 2004 August Month Report on October 6, 2004, that disclosed \$4,200 from Itemized Contributions from Individuals/Persons Other than Political Committees, \$62,000 from Transfers from Affiliated/Other Party Committees, and \$27,960.98 from Offsets to Operating Expenditures on the detailed summary page. The amended report also disclosed a \$17,960.98 decrease for Contributions from other Political Committees, for a total increase

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in receipts of \$76,200. RAD sent the Committee an RFAI on April 13, 2005, requesting an explanation for the additional receipts. In response to the RFAI, the Committee stated that the omission was due to unanticipated volume of financial transactions during the reporting period. The Committee went on to state that within a month of filing the original report, the Committee audited its report and, finding the erroneously omitted receipts, filed the appropriate amendment.

Attached for the Commission's review is the ADR Case Analysis Report, along with copies of the EPS Rating and ADR Rating reports. The ADR Case Analysis Report includes an analysis of the case and a description of the issues that the ADR Office anticipates addressing if the case is assigned to ADR. In addition, the ADR Case Analysis Report has been reviewed by the Office of General Counsel, which concurs in the description of the case.

If the Commission concurs in the recommendation, the above case description will be provided to Respondents as part of ADR Office's notification package sent to Respondents.

RECOMMENDATION:

1. **Assign ADR 313/RR 05L-67 to the ADR Office.**

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ADR CASE ANALYSIS REPORT

ADR Case: 313

Respondents:

CT Democratic State Central Committee
Emma Pierce, Treasurer

RAD Referral: 05L-67

Respondents' Rep.: Emma Pierce

Date Forwarded to ADRO: 2/21/06

Committee Type: Party

Date Reviewed by ADRO: 2/28/06

Committee Name:

CT Democratic State Central Committee

District & State: CT

Election Won-Lost: N/A

Election Cycle: 2004

Summary of Referral: RAD referred the CT Democratic State Central Committee and Emma Pierce, Treasurer, ("Respondents" or the "Committee") for failing to disclose all financial activity on their 2004 August Monthly Report. Specifically, Respondents failed to disclose \$76,200 in additional receipts. The Committee, in its original 2004 August Monthly Report, filed on August 20, 2004, disclosed \$0 from Itemized Contributions from Individuals/Persons Other than Political Committees, \$0 from Transfers from Affiliated/Other Party Committees, and \$0 from Offsets to Operating Expenditures on the detailed summary page. Respondents filed an amended 2004 August Month Report on October 6, 2004, that disclosed \$4,200 from Itemized Contributions from Individuals/Persons Other than Political Committees, \$62,000 from Transfers from Affiliated/Other Party Committees, and \$27,960.98 from Offsets to Operating Expenditures on the detailed summary page. The amended report also disclosed a \$17,960.98 decrease for Contributions from other Political Committees, for a total increase in receipts of \$76,200. RAD sent the Committee an RFAI on April 13, 2005, requesting an explanation for the additional receipts.

Respondents' Reply to RAD: In response to the RFAI, the Committee stated that the omission was due to unanticipated volume of financial transactions during the reporting period. The Committee went on to state that within a month of filing the original report, the Committee audited its report and, finding the additional receipts, filed the appropriate amendment.

Recommendation:
Assign to ADRO

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