

## REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 18, 2007

ANALYST: Jennifer Thangavelu

- I. COMMITTEE: Connecticut Republicans  
C00023838  
Gerald Labriola, Jr., Treasurer  
1010 Wethersfield Avenue, Suite 101N  
Hartford, CT 06114
- II. RELEVANT STATUTE: 2 U.S.C. §434(b)(2)(A)  
2 U.S.C. §434(b)(2)(C)  
11 C.F.R. §104.3(a)(2)(i)(A)  
11 C.F.R. §104.3(a)(2)(ii)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Connecticut Republicans ("the Committee") filed an Amended 2006 October Monthly Report to disclose additional receipts totaling \$295,740.00 (Attachment 2).

On October 20, 2006, the Committee filed its 2006 October Monthly Report covering the period from September 1, 2006 to September 30, 2006 (Image 26950663262). This report disclosed \$36,050.00 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$12,657.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees), and \$45,000.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 26950663264).

On March 2, 2007, the Committee filed an Amended 2006 October Monthly Report covering the period from September 1, 2006 to September 30, 2006 (Image 27930187921). This report disclosed \$377,400.00 on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other than Political Committees), \$12,047.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than

Political Committees), and \$0.00 in receipts on Line 12 (Transfers from Affiliated/Other Party Committees) of the Detailed Summary Page (Image 27930187923).

On May 4, 2007, a Request for Additional Information ("RFAI") was sent to the Committee referencing the Amended 2006 October Monthly Report covering the period of September 1, 2006 to September 30, 2006, received March 2, 2007. Among other noted discrepancies, the RFAI asked for clarification regarding the additional receipts totaling \$341,350.00<sup>1</sup> that were not disclosed on the Committee's original 2006 October Monthly Report (Image 27039435006).

On May 23, 2007, the Committee submitted an Amended 2006 October Monthly Report which disclosed no change in the totals for Lines 11(a)(i), 11(a)(ii), and 12 of the Detailed Summary Page (Image 27990109056). On the same day, the Committee filed a Miscellaneous Electronic Submission (Form 99) referencing the 2006 October Monthly Report. The Committee's Form 99 response stated, "Our amended October Monthly Report did not include items previously reported as those items had been deposited on [sic] October but received in September. Therefore, the report for the period of September 1 - 30 was amended to nclude [sic] those items previously reported on the 12-Day Pre-General." (Image 27930743069)

On June 6, 2007, the Reports Analysis Division (RAD) analyst called Committee representative, Mike Argento, regarding the additional \$295,740.00 in receipts that had not been reported on the original 2006 October Monthly Report. The Analyst explained to Mr. Argento that this issue was referable to the Commission's Office of General Counsel even though the Committee had filed a Miscellaneous Electronic Submission (Form 99) explaining that the receipts had been previously disclosed on the 2006 12 Day Pre-General Report. The Analyst said that in some cases a referral can be cancelled if the activity in question had been disclosed on a prior report. However, in this case, the activity was disclosed on a subsequent report and then later reported on an Amended October Monthly Report. The Analyst advised that Mr. Argento file another Miscellaneous Electronic Submission if he felt that additional clarification was necessary on the public record. Mr. Argento said that he would not file an additional Form 99 on this issue but would wait to hear back from the Commission (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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<sup>1</sup> The RFAI references an increase in receipts on Line 11(a)(i); however, decreases in activity were disclosed on Lines 11(a)(ii) and 12, therefore reducing the total increase in receipts for the amended report to \$295,740.

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FORM TYPE RPT TYPE AI PGI REC DATE PGS BEG IMAGE COVERAGE DATES BEG CASH RECEIPTS DISBURSE END CASH DEBTS BY

28100274009

FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A	4/26/2006	6	26930121409						
MS			T	1/28/2005	1	25970055478						
MS			M	2/10/2005	1	25990043404						
MS			O	2/23/2005	2	25038741810						
MS			T	3/16/2005	1	25990243851						
MS			T	3/21/2005	1	25990276756						
MS			T	7/20/2005	1	25980597192						
MS			T	7/20/2005	1	25980597322						
MS			T	7/21/2005	1	25970744155						
MS			T	11/03/2005	1	25971429404						
MS			T	1/30/2006	1	26980050923						
MS			T	2/08/2006	5	26038993000						
MS			M	2/10/2006	1	26980102103						
MS			T	2/10/2006	1	26990320437						
MS			T	3/03/2006	5	26039012742						
MS			T	3/15/2006	1	26970122539						
MS			T	3/15/2006	1	26970122639						
MS			O	3/15/2006	2	26039013444						
MS			T	3/23/2006	6	26039021403						
MS			N	4/14/2006	2	26039034675						
MS			T	4/18/2006	1	26960069910						
MS			T	5/15/2006	1	26960102532						
MS			T	5/16/2006	1	26950110545						
MS			T	5/17/2006	1	26930138346						
MS			T	5/18/2006	1	26940143771						
MS			T	6/15/2006	1	26960145537						
MS			T	6/15/2006	1	26930175083						
MS			T	6/15/2006	1	26940192907						
MS			T	6/19/2006	1	26950169073						
MS			T	7/07/2006	1	26940221754						
MS			T	7/17/2006	1	26940261670						
MS			T	8/11/2006	1	26930312097						
MS			T	8/11/2006	1	26950408181						
MS			T	8/11/2006	1	26940289575						
MS			T	8/11/2006	1	26950408656						
MS			T	9/19/2006	1	26960375568						
MS			T	9/19/2006	1	26930380828						
MS			T	10/06/2006	1	26950530968						

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FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
MS			T	10/20/2006	1	26940511329						
MS			T	10/23/2006	1	26940514105						
MS			T	12/11/2006	1	26930727504						
RQ	MY	2		10/05/2005	5	25038902397	1/01/2005 6/30/2005					
RQ	MY	2		4/14/2006	3	26039034523	1/01/2005 6/30/2005					
RQ	MY	2		6/09/2006	3	26039094649	1/01/2005 6/30/2005					
RQ	YE	2		4/21/2006	3	26039060132	7/01/2005 12/31/2005					
RQ	M2	2		5/19/2006	3	26039083360	1/01/2006 1/31/2006					
RQ	M3	2		5/19/2006	3	26039083363	2/01/2006 2/28/2006					
RQ	M4	2		5/19/2006	3	26039083366	3/01/2006 3/31/2006					
RQ	M5	2		7/26/2006	3	26039152983	4/01/2006 4/30/2006					
RQ	M6	2		7/26/2006	3	26039152989	5/01/2006 5/31/2006					
RQ	M7	2		9/08/2006	3	26039181170	6/01/2006 6/30/2006					
RQ	M8	2		9/22/2006	3	26039190266	7/01/2006 7/31/2006					
RQ	M9	2		5/04/2007	3	27039435003	8/01/2006 8/31/2006					
RQ	M10	2		12/08/2006	3	26039301096	9/01/2006 9/30/2006					
RQ	M10	2		5/04/2007	3	27039435006	9/01/2006 9/30/2006					
RQ	12G	2		5/04/2007	3	27039435009	10/01/2006 10/01/2006					
RQ	12G	2		2/02/2007	3	27039373296	10/01/2006 10/18/2006					
RQ	30G	2		3/14/2007	6	27039402807	10/19/2006 11/27/2006					
RQ	YE	2		5/04/2007	3	27039435012	11/28/2006 12/31/2006					
RQ	YE	2		6/29/2007	3	27039460785	11/28/2006 12/31/2006					
3	MY	N	P	7/21/2005	147	25970743889	1/01/2005 6/30/2005	4960	172314	158833	18441	51639

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3	MY	A	P	11/03/2005	155	25971428835	1/01/2005 6/30/2005	4960	172314	158833	18441	51639
3	MY	A	P	5/15/2006	155	26950109038	1/01/2005 6/30/2005	4960	172314	158833	18441	51639
3	MY	A	P	7/07/2006	155	26940221599	1/01/2005 6/30/2005	4960	172314	158833	18441	51639
3	YE	N	P	1/30/2006	147	26990179835	7/01/2005 12/31/2005	18441	159043	174058	3426	72753
3	YE	A	P	5/18/2006	147	26940143618	7/01/2005 12/31/2005	18441	159043	174058	3426	72753
3	M2	N	P	2/10/2006	30	26980102104	1/01/2006 1/31/2006	3426	19709	20633	2502	77552
3	M2	A	P	3/15/2006	30	26970122282	1/01/2006 1/31/2006	3426	19709	20633	2502	77502
3	M2	A	P	6/15/2006	30	26940192872	1/01/2006 1/31/2006	3426	19709	20633	2502	77502
3	M3	N	P	3/15/2006	34	26970122540	2/01/2006 2/28/2006	2502	24901	25387	2016	81512
3	M4	N	P	4/18/2006	38	26960069872	3/01/2006 3/31/2006	2016	37198	27027	12186	94458
3	M4	A	P	5/16/2006	39	26930137178	3/01/2006 3/31/2006	2016	37198	27027	12186	100049
3	M4	A	P	6/15/2006	39	26950164885	3/01/2006 3/31/2006	2016	37198	27027	12186	100049
3	M5	N	P	5/17/2006	35	26950112930	4/01/2006 4/30/2006	12186	28242	34383	6045	101179
3	M5	A	P	8/11/2006	35	26930312062	4/01/2006 4/30/2006	12186	28242	34383	6045	101179
3	M6	N	P	6/19/2006	36	26940195875	5/01/2006 5/31/2006	6045	60725	32869	33901	116734
3	M6	A	P	8/11/2006	35	26930312098	5/01/2006 5/31/2006	6045	60725	32869	33901	116734
3	M6	A	P	10/06/2006	37	26930420982	5/01/2006 5/31/2006	6045	60725	32869	33901	116734
3	M7	N	P	7/17/2006	40	26940261630	6/01/2006 6/30/2006	33901	89104	44713	78293	117174
3	M7	A	P	8/11/2006	41	26930312138	6/01/2006 6/30/2006	33901	89104	44713	78293	150443
3	M7	A	P	10/06/2006	42	26930421019	6/01/2006 6/30/2006	33901	89104	44713	78293	150443
3	M8	N	P	8/11/2006	49	26930312179	7/01/2006 7/31/2006	78293	153087	86039	145341	112433
3	M8	A	P	9/19/2006	49	26960375510	7/01/2006 7/31/2006	78293	153087	86039	145341	115433
3	M9	N	P	9/19/2006	38	26940332566	8/01/2006 8/31/2006	145341	30434	48923	126852	121848
3	M9	A	P	1/09/2007	38	27930028820	8/01/2006 8/31/2006	145341	77044	48923	173462	121848
3	M10	N	P	10/20/2006	52	26950663262	9/01/2006 9/30/2006	126852	96775	113276	110352	123699
3	M10	A	P	1/09/2007	52	27940035775	9/01/2006 9/30/2006	173462	50165	113276	110352	123699
3	M10	A	P	3/02/2007	64	27930187921	9/01/2006 9/30/2006	173462	392515	113276	452702	123699
3	M10	A	P	5/23/2007	63	27990109054	9/01/2006 9/30/2006	173462	392515	113276	452702	123699
3	M10	A	P	8/14/2007	63	27931099222	9/01/2006 9/30/2006	173462	392515	113276	452702	123699
3	12G	N	P	10/26/2006	60	26940565146	10/01/2006 10/18/2006	110352	387718	104285	393785	107152

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3	12G	A	P	2/01/2007	58	27950050166	10/01/2006 10/18/2006	110352	387718	100541	397529	107152
3	12G	A	P	3/01/2007	46	27930176823	10/01/2006 10/18/2006	452702	45368	100541	397529	107152
3	12G	A	P	3/02/2007	46	27930178532	10/01/2006 10/18/2006	452702	45368	100541	397529	107152
3	12G	A	P	8/14/2007	46	27931099401	10/01/2006 10/18/2006	452702	45368	100541	397529	108150
3	30G	N	P	12/07/2006	140	26940882956	10/19/2006 11/27/2006	397529	428553	695350	130733	202261
3	30G	A	P	2/01/2007	140	27950050016	10/19/2006 11/27/2006	397529	428553	695427	130655	202261
3	30G	A	P	4/12/2007	137	27930503979	10/19/2006 11/27/2006	397529	428553	695427	130655	202261
3	30G	A	P	5/11/2007	137	27930712705	10/19/2006 11/27/2006	397529	428553	695427	130655	202261
3	30G	A	P	8/14/2007	137	27931099552	10/19/2006 11/27/2006	397529	428553	695102	130980	181722
3	YE	N	P	1/31/2007	63	27930121639	11/28/2006 12/31/2006	130655	63245	117792	76108	133706
3	YE	A	P	4/12/2007	58	27930504258	11/28/2006 12/31/2006	130655	63245	117792	76108	133706
3	YE	A	P	5/23/2007	58	27930743082	11/28/2006 12/31/2006	130655	63245	117792	76108	133706
3	YE	A	P	7/27/2007	58	27990373362	11/28/2006 12/31/2006	130655	63245	117792	76108	133706
3	YE	A	P	8/14/2007	58	27931099689	11/28/2006 12/31/2006	130980	63245	117965	76260	112246
TOTAL									1751048	1679749		

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**Connecticut Republicans (C00023838)**  
**2006 October Monthly Report/Amended 2006 October Monthly Report**  
**Overview of Additional Receipts**

Report Line	Original 2006 October Monthly Report (Image 26950663264)	Amended 2006 October Monthly Report, received 3 2 07 (Image 27930187923)	Variance Amount
11(a)(i)	\$36,050.00	\$377,400.00	\$341,350.00
11(a)(ii)*	\$12,657.00	\$12,047.00	-\$610.00
12*	\$45,000.00	\$0.00	-\$45,000.00
<b>Total Variance</b>			<b>\$295,740.00</b>

\*Decrease in activity

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