



Connecticut Republicans

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December 20, 2007

Federal Elections Commission
Alternative Dispute Resolution Office
999 E. Street N.W.
Washington, D.C. 20463

Attn: Lynn M. Fraser
Assistant Director
Re: ADR 425 (RR 07L-40)
2006 October Monthly Report (09/01/06-09/30/06)

Dear Ms. Fraser:

As requested in your letter of December 6, 2007, the following is our additional response and proposed stipulations to resolve the matter referenced above. I will be available for discussion of this matter from 12:00 noon or later on the following dates: December 26-27, 31, or any date at your convenience from January 2 forward.

FEC Letter Dated November 13, 2007 - Issue Referred to ADR Office:

“Summary: Treasurers of political committees are required to report all financial activity, including all receipts, pursuant to the FECA. RAD referred the Connecticut Republicans and Gerald Labriola, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2006 October Monthly Report. The Committee filed its original 2006 October Monthly Report on October 20, 2006. An amended 2006 October Monthly Report filed on March 2, 2007 disclosed \$295,740 in additional receipts. A RFAI was sent to Respondents on May 4, 2007.

In response to the inquiry from RAD, Respondents stated they filed an amended 2006 October Monthly Report when they realized the original 2006 October Monthly Report did not include items received in September, but deposited in October. The contributions had incorrectly been disclosed on the 12 Day Pre-General Report, rather than on the earlier 2006 October Monthly Report, based on the date of deposit rather than the date of receipt.”

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Additional Response – Timeline - by Connecticut Republicans Re: ADR 425):

The **original filing** of the 2006 October Monthly Report (9/1/06-9/30/06) was made on October 20, 2006.

FEC Letter dated February 2, 2007: This letter referenced the 12 Day Pre-General Report (10/1/06-10/18/06) as follows:

“Your report discloses activity that falls outside the reporting period. Please amend this report by including only the financial transactions that occurred between 10/1/06 and 10/18/06....”

Connecticut Republicans Response to FEC Letter dated February 2, 2007: Amendment 3 – FEC-279536, filed 03/02/07 to supersede FEC-253034.

The issue: contributions received at the end of September were deposited at the beginning of October and reported on our 12-Day Pre-General Report (10/1/06-10/18/06).

Amendment 3 – FEC-279536 to the 12 Day Pre-General Report (10/1/06-10/18-06) was filed on 03/2/07. This amendment removed the September received contributions deposited at the beginning of October and reported on the 12 Day Pre-General Report (10/1/06-10/18/06) from the 12-Day Pre-General Report to the October Monthly Report (9/1/06-9/30/06).

As a consequence of the issue raised in the FEC Letter of February 2, 2007, Amendment 2 - FEC-279547 to the October Monthly Report (9/1/06-9/30/06) was also filed on 03/02/07 to supersede FEC-247425 to include the September items in this amended report which had been originally reported on the 12 Day Pre-General Report (10/1/06-10/18/06).

F-99 – FEC-279554: This letter of explanation was also filed on 03/02/07 in response to the FEC Letter of February 2, 2007. The letter noted the correction of September items originally reported on the 12 Day Pre-General Report (10/1/06-10/18/06), and it referenced the resulting correction to the October Monthly Report (9/1/06-9/30/06) as follows: “As these changes affected our September report an amendment has been filed for that report as well as FEC-279547.”

FEC Letter dated May 4, 2007: This letter referenced our Amended October Monthly Report (9/1/06-9/30/06), received 3/2/07. Paragraph one reads as follows:

“Your amended report discloses additional receipts totaling \$341,350.00 on Line(s) 11(a)(i) of the Detailed Summary Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. 11 CFR 104.3”

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**Connecticut Republicans Response to FEC Letter dated May 4, 2007:
F99-FEC-289688, Letter of Explanation, filed 05/23/07.**

The FEC Letter of May 4, 2007 referenced the disclosure of additional receipts to our amended October Monthly Report (9/1/06-9/30/06) filed on 3/2/07.

F99-FEC-289688: This letter of explanation was filed on 5/23/07 in which we indicated that the items in question had been deposited at the beginning of October, and thus, originally reported on the 12-Day Pre-General Report (10/1/06-10/18/06). We noted that we had amended the report for the period of (9/1/06-9/30/06). We did not state that the additional disclosure was a result of the FEC Letter of February 2, 2007 and that an F99 letter of explanation, FEC-279554, was also filed in response.

CTGOP Reporting Procedures:

Reporting System: In 2006 our reporting system was our "ABE" system, developed with the help of an outside vendor. Contributions were reported on our FEC reports by receipt date. However, in order to provide us with a greater ability to balance FEC reports to our internal bank records, contributions were assigned to a reporting period by deposit date. The circumstance in which contributions received at the end of one reporting period were deposited at the beginning of a succeeding reporting period would require special attention and experience to insure proper reporting.

Personnel Change: On July 31, 2006 I left the employment as office manager of Connecticut Republicans after ten years. An employee new to this process assumed the duties associated with our reporting system. The first FEC filing for which the new employee was responsible was the September Monthly Report (8/1/06-8/31/06). The FEC sent a letter dated December 8, 2006 regarding this report which stated:

"Your report discloses activity that falls outside the reporting period. Please amend this report by including only the financial transactions that occurred between 9/1/06 and 9/30/06. Any activity occurring outside this reporting period should be included in the appropriate report(s). 2 U.S.C. 434(b)" Response due by 1/9/07.

Similar to the October Monthly Report under discussion, the items in question were contributions received at the end of August deposited at the beginning of September. The report was amended by FEC-268292 on 1/9/07. The ending cash balances of the original reports for both the September Monthly Report (8/1/06-8/31/06) and the October Monthly Report (09/1/06-09/30/06) balanced with our checkbook, and therefore, the possibility of omitted items on either report did not become apparent.

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Proposed Stipulation

The October Monthly Report (9/1/06-9/30/06) filed on October 20, 2006 omitted items received in September which had been deposited at the beginning of October.

The items in question were reported on the succeeding 12-Day Pre-General Report (10/1/06-10/18/06) filed on 10/26/06.

The FEC sent, and the Connecticut Republicans received, correspondence dated February 2, 2007 acknowledging the error and requiring an adequate response by March 5, 2007.

The Connecticut Republicans adequately responded on March 2, 2007 to the FEC letter of February 2, 2007 by amending both the 12-Day Pre-General Report (10/1/06-10/18/06) as referenced in the letter, as well as the October Monthly Report (9/1/06-9/30/06) to ensure the proper reporting of the items in question.

The FEC sent, and the Connecticut Republicans received, correspondence dated May 4, 2007 acknowledging disclosure of the additional receipts on our amended October Monthly Report (9/1/06-9/30/06), requesting clarifying information as to why this activity was not disclosed on the original report, and requiring an adequate response by June 4, 2007.

The Connecticut Republicans adequately responded on May 23, 2007 to the FEC letter of May 4, 2007 with an F99 letter of explanation noting that the items in question had been deposited in October, and thus, were reported on the 12-Day Pre-General Report (10/1/06-10/18/06).

The reporting error in question was the result of personnel changes and systematic procedures, not a result of the willful intent on the part of Connecticut Republicans.

That as of January 1, 2007, Connecticut Republicans has employed a nationally known reporting system, Aristotle International, providing systemic changes which would prevent the technical misreporting of items in circumstances similar to those in this matter.

The FEC and Connecticut Republicans are satisfied that actions previously required by the FEC and taken by Connecticut Republicans in a timely manner have resolved this matter and that no further action is required.

Respectfully submitted,



Michael Argento, Office Manager
Representing Jerry Labriola, Jr., Treasurer

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