



FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2010 APR 26 A 10: 02

Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

April 23, 2010

TO: The Commission

THROUGH: Alec Palmer *AP*  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 533 Connecticut Democratic State Central Committee and Emma Pierce, Treasurer,  
Recommendation to Approve Settlement Agreement

**RESOLUTION TERMS:** Develop and implement a process to track receipt of, and response to, communications with the Commission; certify annually for calendar years 2010-2012 that Respondents had an external compliance firm review reports and conduct a reconciliation of the Committee's financial activities by January 31<sup>st</sup> of each succeeding year; i.e., by January 31, 2011 through January 31, 2013; send a Committee representative to a FEC conference; send a Committee representative to meet with the Commission staff to review reporting requirements; and pay a civil penalty of \$2,400.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 533 (RAD 09L-51)**. The ADR Office received this referral on December 23, 2009.

**SUMMARY:** The Reports Analysis Division referred the Connecticut Democratic State Central Committee and Emma Pierce, Treasurer, (Respondents or the Committee) for cumulative errors during the 2008 election cycle which disclosed the Committee was not in substantial compliance with the FECA. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. 2 U.S.C. § 437(g).

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In addition, RAD referred Respondents for a failure to disclose all financial activity on the Committee's 2008 30 Day Post-General Report. The Committee filed a series of amended 2008 30 Day Post-General Reports resulting in increased receipts of \$126,491.83.

Respondents acknowledge reporting some deficiencies during the 2008 election cycle, some of which resulted from a transition from one compliance software system to another, and some from human error.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of the Connecticut Democratic State Central Committee and Emma Pierce, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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