



Federal Election Commission
Washington, DC 20463

May 14, 2010

Neil Reiff, Esq.
Sandler Reiff & Young
300 M Street SE, Suite 1102
Washington, DC 20003

Re: ADR 533 (RAD 09L-51)
Connecticut Democratic State Central Committee and Emma Pierce, Treasurer

Dear Mr. Reiff:

Enclosed is the signed copy of the agreement resolving the referral initiated on – **December 23, 2009** – by the Federal Election Commission (“FEC/Commission”) involving Connecticut Democratic State Central Committee and Emma Pierce, Treasurer (“Respondents”). The agreement for **ADR 533 (RAD 09L-51)** was approved by the Commission on **May 10, 2010** – the effective date of the agreement.

Note the specific time frames for compliance in **paragraph 8** of the agreement. **Please forward to this office, a statement confirming Respondent’s compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in **paragraph 8**, and contain the ADR caption and case number. **[The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on or before June 9, 2010. Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.]**

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC’s Public Information Office.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory

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responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

LSI

Lynn M. Fraser, Director
Alternative Dispute Resolution Office
202-694-1665

Enclosure: Agreement

cc: Chris Wedderburn, Finance and Accounting Office
Room 819

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**Federal Election Commission
Washington, DC 20463**

Case Number: ADR 533
Source: RAD 09L-51
Case Name: Connecticut Democratic
State Central Committee

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Neil Reiff, Esq., representing the Connecticut Democratic State Central Committee and Emma Pierce, in her official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996." 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division (RAD) referred the Respondents for the cumulative nature of deficiencies on reports filed with the Commission in the 2008 election cycle which disclosed the Committee was not in substantial compliance with the FECA.
4. RAD, in addition, referred Respondents for a failure to disclose all financial activity on the Committee's 2008 30 Day Post-General Report. Respondents filed a series of amended 2008 30 Day Post-General Reports resulting in increased receipts of \$126,491.83.
5. 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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6. Treasurers of political committees are required to report all financial activity, including all receipts, pursuant to the FECA. 2 U.S.C. §§ 434(a)(1), 434(b)(2), 11 C.F.R. §§ 104.1, 104.3(a)
 7. Respondents acknowledge reporting deficiencies, some of which resulted from a transition from one compliance software system to another, and some from human error. Respondents contend that in 2008, the Committee contracted with Evans and Katz to perform an internal audit of the Committee's financial activity from mid-2006 to the present, and had the compliance firm file all necessary amendments beginning with an adjusted cash-on-hand as of January 1, 2007. The Committee continues to retain Evans and Katz to assist with compliance.
 8. Respondents, in an effort to avoid similar errors in the future, agree to: (a) develop and implement a process to track receipt of, and response to, communications with the Commission within thirty (30) days of the effective date of this agreement; (b) 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, 2011 through January 31, 2013; and (c) send a Committee representative to a FEC conference within 12 months of the effective date of this agreement; (d) send a Committee representative to meet with the Commission staff to review reporting requirements within 12 months of the effective date of this agreement; and (e) pay a civil penalty of \$2,400 within thirty (30) days of the effective date of this agreement.
 9. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
 10. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
 11. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 8 above.
 12. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 533 (RAD 09L-51), and resolves those issues identified in paragraph 3 and 4 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

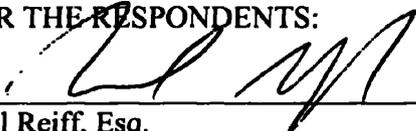
FOR THE COMMISSION:

Lynn M. Fraser, Director
Alternative Dispute Resolution Office



5/10/10
Date Signed

FOR THE RESPONDENTS:



Neil Reiff, Esq.
Representing the Connecticut Democratic State
Central Committee and Emma Pierce, Treasurer

4/21/10
Date Signed

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