

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 1, 2012

ANALYST: David Butler

- I. COMMITTEE: Deborah Noble, Treasurer
C00428649
CT Working Families Federal PAC D/B/A
Take Back Congress CT
621 Farmington Avenue
Hartford, CT 06105
- II. RELEVANT STATUTES: 2 U.S.C. § 434(b)(2) and (4)
11 CFR § 104.3(a) and (b)

III. BACKGROUND:

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

CT Working Families Federal PAC D/B/A Take Back Congress CT (“the Committee”) amended its 2010 February Monthly, 2010 May Monthly, 2010 June Monthly, 2010 July Monthly, 2010 October Monthly, 2010 30 Day Post-General, 2010 Year-End, 2011 February Monthly, and 2011 March Monthly Reports to disclose additional receipts of \$41,334.96 and additional disbursements of \$55,232.87 which were not disclosed in the original reports (Attachments 1 and 2).

2010 February Monthly Report

On February 20, 2010, the Committee filed the original 2010 February Monthly Report covering the period from January 1, 2010 through January 31, 2010. The report disclosed \$0.00 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 10990327749). The report also disclosed \$0.00 in disbursements on Line 21(a)(i) (Federal Share of Allocated Federal/Non-Federal Activity), \$0.00 in disbursements on Line 21(a)(ii) (Non-Federal

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Share of Allocated Federal/Non-Federal Activity) and \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 10990327750).

On July 27, 2011, the Committee's administrative assistant, Corrine Locke, called and spoke with a Reports Analysis Division (RAD) Analyst about amending the Committee's 2010 February Monthly Report to include previously undisclosed salary payments and transfers in from the Committee's non-federal account. The Analyst advised her to disclose the activity and explained that the Committee may receive a Request for Additional Information (RFAD) regarding the increase in activity (Attachment 5).

On July 28, 2011, the Committee filed an Amended 2010 February Monthly Report. The report disclosed \$3,000.00 in receipts on Line 11(c) of the Detailed Summary Page, an increase of \$3,000.00 from the original report (Image 11932108802; Attachment 3). The report also disclosed \$3,555.41 in disbursements on Line 21(a)(i), \$3,555.41 in disbursements on Line 21(a)(ii), and \$6,796.95 in disbursements on Line 29 of the Detailed Summary Page, a total increase in disbursements of \$13,907.77 from the original report (Image 11932108803; Attachment 4).

2010 May Monthly Report

On May 20, 2010, the Committee filed the original 2010 May Monthly Report covering the period from April 1, 2010 through April 30, 2010. The report disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 10930741283).

On July 28, 2011, the Committee filed an Amended 2010 May Monthly Report. The report disclosed \$1,747.95 in disbursements on Line 29 of the Detailed Summary Page, an increase of \$1,747.95 from the original report (Image 11932109027; Attachment 4).

2010 June Monthly Report

On June 20, 2010, the Committee filed the original 2010 June Monthly Report covering the period from May 1, 2010 through May 31, 2010. The report disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 10990804604).

On July 28, 2011, the Committee filed an Amended 2010 June Monthly Report. The report disclosed \$1,783.03 in disbursements on Line 29 of the Detailed Summary Page, an increase of \$1,783.03 from the original report (Image 11932109038; Attachment 4).

2010 July Monthly Report

On July 20, 2010, the Committee filed the original 2010 July Monthly Report covering the period from June 1, 2010 through June 30, 2010. The report disclosed \$0.00

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in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals/Persons Other than Political Committees) and \$0.00 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 10991008599). The report also disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 10991008600).

On July 28, 2011, the Committee filed an Amended 2010 July Monthly Report. The report disclosed \$50.00 in receipts on Line 11(a)(ii) and \$5,000.00 in receipts on Line 11(c) of the Detailed Summary Page, a total increase in receipts of \$5,050.00 from the original report (Image 11932109176; Attachment 3). The report also disclosed \$312.61 in disbursements on Line 29 of the Detailed Summary Page, an increase of \$312.61 from the original report (Image 11932109177; Attachment 4).

2010 October Monthly Report

On October 20, 2010, the Committee filed the original 2010 October Monthly Report covering the period from September 1, 2010 through September 30, 2010. The report disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 10931635755).

On July 28, 2011, the Committee filed an Amended 2010 October Monthly Report. The report disclosed \$3,164.49 in disbursements on Line 29 of the Detailed Summary Page, an increase of \$3,164.49 from the original report (Image 11932109693; Attachment 4).

2010 30 Day Post-General Report

On December 2, 2010, the Committee filed the original 2010 30 Day Post-General Report covering the period from October 14, 2010 through November 22, 2010. The report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals/Persons Other Than Political Committees) and \$0.00 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 10931978544). The report also disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) and \$0.00 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page (Image 10931978545).

On July 28, 2011, the Committee filed an Amended 2010 30 Day Post-General Report. The report disclosed \$1,000.00 in receipts on Line 11(a)(i) and \$4,000.00 in receipts on Line 11(c) of the Detailed Summary Page, a total increase in receipts of \$5,000.00 from the original report (Image 11932109712; Attachment 3). The report also disclosed \$2,430.48 in disbursements on Line 29 and \$979.50 in disbursements on Line 30(b) of the Detailed Summary Page, a total increase in disbursements of \$3,409.98 from the original report (Image 11932109713; Attachment 4).

2010 Year-End Report

On January 31, 2011, the Committee filed the original 2010 Year-End Report covering the period from November 23, 2010 through December 31, 2010. The report disclosed \$0.00 in receipts on Line 11(c) (Contributions from Other Political Committees) and \$0.00 in receipts on Line 18(a) (Transfers from a Non-Federal Account) of the Detailed Summary Page (Image 11930290015). The report also disclosed \$0.00 in disbursements on Line 21(a)(i) (Federal Share of Allocated Expenditures), \$0.00 in disbursements on Line 21(a)(ii) (Non-Federal Share of Allocated Expenditures), \$0.00 in disbursements on Line 29 (Other Disbursements) and \$0.00 in disbursements on Line 30(b) (Federal Election Activity Paid Entirely with Federal Funds) of the Detailed Summary Page (Image 11930290016).

On July 28, 2011, the Committee filed an Amended 2010 Year-End Report. The report disclosed \$5,000.00 in receipts on Line 11(c) and \$16,950.41 in receipts on Line 18(a) of the Detailed Summary Page, a total increase in receipts of \$21,950.41 from the original report (Image 11932109780; Attachment 3). The report also disclosed \$13,420.19 in disbursements on Line 21(a)(i), \$13,420.16 in disbursements on Line 21(a)(ii), \$1,182.82 in disbursements on Line 29 and \$187.18 in disbursements on Line 30(b) of the Detailed Summary Page, a total increase in disbursements of \$28,210.35 from the original report (Image 11932109781; Attachment 4).

2011 February Monthly Report

On February 20, 2011, the Committee filed the original 2011 February Monthly Report covering the period from January 1, 2011 through January 31, 2011. The report disclosed \$0.00 in receipts on Line 18(a) (Transfers from Non-Federal Account) of the Detailed Summary Page (Image 11930407779). The report also disclosed \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 11930407780).

On July 28, 2011, the Committee filed an Amended 2011 February Monthly Report. The report disclosed \$3,805.77 in receipts on Line 18(a) of the Detailed Summary Page, an increase of \$3,805.77 from the original report (Image 11932109799; Attachment 3). The report also disclosed \$152.91 in disbursements on Line 29 of the Detailed Summary Page, an increase of \$152.91 from the original report (Image 11932109800; Attachment 4).

2011 March Monthly Report

On March 22, 2011, the Committee filed the original 2011 March Monthly Report covering the period from February 1, 2011 through February 28, 2011. The report disclosed \$0.00 in receipts on Line 18(a) (Transfers from Non-Federal Account) of the Detailed Summary Page (Image 11930539937). The report also disclosed \$0.00 in disbursements on Line 21(a)(i) (Federal Share of Allocated Expenditures) and \$0.00 in disbursements on Line 29 (Other Disbursements) of the Detailed Summary Page (Image 11930539938).

On July 28, 2011, the Committee filed an Amended 2011 March Monthly Report. The report disclosed \$2,528.78 in receipts on Line 18(a) of the Detailed Summary Page, an increase of \$2,528.78 from the original report (Image 11932109812; Attachment 3). The report also disclosed \$2,528.78 in disbursements on Line 21(a)(i) and \$15.00 in disbursements on Line 29 of the Detailed Summary Page, a total increase in disbursements of \$2,543.78 from the original report (Image 11932109813; Attachment 4).

On February 21, 2012, an RFAI was sent to the Committee referencing the Amended 2011 March Monthly Report, received July 28, 2011. The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2010 February Monthly, 2010 May Monthly, 2010 June Monthly, 2010 July Monthly, 2010 October Monthly, 2010 30 Day Post-General, 2010 Year-End, 2011 February Monthly, and 2011 March Monthly Reports, that were not disclosed in the original filings (Image 12330002836).

On February 23, 2012, the RAD Analyst left a voice mail message for Ms. Locke. The Analyst advised that if the Committee would like to provide any additional information to clarify the increase in activity disclosed on the reports referenced in the RFAI, the Committee should disclose the additional information on the public record. (Attachment 5).

To date, no further communications have been received from the Committee regarding these matters.

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