



**Federal Election Commission
Washington, DC 20463**

MEMORANDUM

March 9, 2012

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia Carmona
Chief Compliance Officer

Lynn M. Fraser
Director, ADR Office

SUBJECT: ADR 606 and ADR 608 CT Working Families Federal PAC and Deborah Noble, Treasurer, Informational Memo on Consolidation and Assignment

The Reports Analysis Division (RAD) referred RAD 12L-09 on March 1, 2012, and the ADR Office designated the referral as ADR 606. The Office of General Counsel referred MUR 6480 on March 5, 2012, and the ADR Office designated the referral as ADR 608. We included a summary and discussion of these referrals for your information, and recommend consolidation of these matters for processing. We anticipate initiating communication with Respondents in ADR 606 and ADR 608 on March 15, 2012. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

Summary of Case: RAD referred the CT Working Families Federal PAC d/b/n Take Back Congress CT and Deborah Noble, Treasurer (Respondents or the Committee) for failing to accurately disclose all financial information in nine reports; specifically their 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. In amended reports filed July 28, 2011, the Committee disclosed additional receipts of \$41,334.96 and additional disbursements of \$55,232.87.

In ADR 608, the Complainant, Christopher Healy, alleges that the Committee, a state committee registered with the Commission, violated the FECA and Commission regulations because it does not use the name "Working Families

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Campaign Committee," which is the name of an independent political party registered with the Connecticut State Elections Enforcement Commission. The complaint also alleges that Respondents violated the FECA by accepting contributions from the State Party, and did not disclose them as income on their FEC reports.

Respondents contend that the Federal PAC's name complies with Commission regulations as it does not include the name of any candidate, and the funds from the State Party were not illegal contributions, but rather reimbursements for shared activities that were funded by the Federal PAC.