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July 28, 2011

**BY OVERNIGHT DELIVERY**

Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal  
Administration  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

**Re: MUR 6480**

Dear Mr. Jordan:

This firm represents the Working Families Party's Connecticut State Committee (the "Party"). I write in response to your July 12, 2011 letter in matter MUR 6480 regarding the complaint filed by Christopher C. Healy of the Connecticut Republican State Central Committee (the "Complaint"). The Party received your letter on July 16.

The payments listed in the Complaint were not contributions, but rather reimbursements from the Working Families Campaign Committee – the Party's Connecticut state account (the "state campaign committee") – to the CT Working Families Federal PAC d/b/a Take Back Congress CT – the Party's Federal account (the "federal campaign committee") – for shared activities initially funded by the federal campaign committee. The federal campaign committee's FEC disclosures have been updated to reflect all of the activity in question.

With respect to the Complaint's contention regarding the name of the federal campaign committee, the committee responds that the federal campaign committee's name fully complies with 11 C.F.R. §§ 102.14(a) and (b)(3) in that it does not include the name of any candidate. Moreover, the FEC recognized the federal campaign committee as the State Committee of the Connecticut Working Families Party in its Advisory Opinion 2010-22, having full notice of the names of the two committees. Finally, although the federal campaign committee's name

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includes the words "Take Back Congress CT," the names of the committees are otherwise similar enough to avoid any confusion as to the relationship between the two.

Please do not hesitate to contact me should you require more information. Thank you very much.

Very truly yours,



Alexander Rabb

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