



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

March 15, 2012

Deborah Noble, Treasurer  
CT Working Families Federal PAC  
621 Farmington Avenue  
Hartford, CT 06105

Re: ADR 606 (RAD 12L-09) and ADR 608 (MUR 6480)  
CT Working Families Federal PAC and Deborah Noble, Treasurer

Dear Ms. Nobel:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Office of General Counsel was based on a complaint filed by Christopher C. Healy which alleges a violation of the Federal Election Campaign Act of 1971, as amended by the CT Working Families Federal PAC. This matter has been consolidated for processing with ADR 606 (RAD 12L-09) absent objection from the Committee.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with the CT Working Families Federal PAC and Deborah Nobel, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement concludes the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations, are summarized as follows:

In ADR 606, the Reports Analysis Division (RAD) referred the CT Working Families Federal PAC d/b/a 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

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
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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 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.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondents would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 608**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

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

Enclosures: ADR Frequently Asked Questions  
Commitment to Submit Matter to ADR  
Designation of Representative/Counsel

CC: Alexander Rabb, Esq.