



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

A81-60

April 12, 1982

MEMORANDUM

TO: FRED EILAND  
PRESS OFFICE

FROM: BOB COSTA *RPC*

SUBJECT: PUBLIC ISSUANCE OF FINAL AUDIT REPORT -  
CONNECTICUT DEMOCRATIC PRESIDENTIAL COMMITTEE

Attached please find a copy of the final audit report of the Connecticut Democratic Presidential Committee which was approved by the Commission on April 5, 1982.

Informational copies of the report have been received by all parties involved and the report may be released to the public.

Attachment as stated

cc: FEC Library  
RAD  
Public Record



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REPORT OF THE AUDIT DIVISION  
ON THE  
CONNECTICUT DEMOCRATIC PRESIDENTIAL COMMITTEE

I. Background

A. Overview

This report is based on an audit of the Connecticut Democratic Presidential Committee ("the Committee"), undertaken by the Audit Division of the Federal Election Commission in accordance with the Commission's audit policy to determine whether there has been compliance with the provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The audit was conducted pursuant to Section 438(b) of Title 2 of the United States Code which states, in part, that the Commission may conduct audits and field investigations of any political committee required to file a report under Section 434 of this title. Prior to conducting any audit under this section, the Commission shall perform an internal review of reports filed by selected committees to determine if the reports filed by a particular committee meet the threshold requirements for substantial compliance with the Act.

The Committee registered with the Federal Election Commission on October 17, 1980. The Committee maintains its headquarters in Hartford, Connecticut.

The audit covered the period September 1, 1980 through December 31, 1980. The Committee reported a cash balance on September 1, 1980 of \$-0-; total receipts of \$85,016.00; total expenditures of \$83,435.48; and a cash balance on December 31, 1980 of \$1,580.52.

This audit is based on documents and work papers which support each of its factual statements. They form part of the record upon which the Commission based its decisions on the matters in the report and were available to the Commissioners and appropriate staff for review.

B. Key Personnel

The Treasurer for the Committee during the period covered by the audit was Mr. Raymond J. Devlin, Jr.

C. Scope

The audit included such tests as verification of total reported receipts and expenditures and individual transactions; review of required supporting documentation; analysis of Committee debts and obligations; and such other audit procedures as deemed necessary under the circumstances.

II. Audit Findings and Recommendations

A. Disclosure of Contributor Information

Section 434(b) (3) (A) of Title 2 of the United States Code states, in part, that each report shall disclose the identification of each person who makes a contribution during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, together with the date and amount of any such contribution. In addition, Section 104.3(a) (4) of Title 11 of the Code of Federal Regulations requires the committee to disclose the identification of each contributor and the aggregate year-to-date total for such contributor.

Section 431(13) (A) of Title 2 of the United States Code states, in part, that the term "identification" means, in the case of an individual, the name and mailing address.

During the review of the Committee's disclosure reports, it was noted that the Committee did not provide the date of receipt, the aggregate year-to-date total for 115 contributions totaling \$70,200.00 or 100% of the total number and total dollar value of itemizable contributions. In addition, the Committee failed to provide the mailing addresses for 14 contributors whose contributions totaled \$8,750.00 or 12.2% of the total number and 12.5% of the total dollar value of itemizable contributions. The Committee stated that this was an result of an oversight, and has agreed to amend its reports.

The Audit Division recommended that the Committee, within 30 days of receipt of the interim report, amend its reports to disclose the date of receipt, mailing address, aggregate year-to-date total for the contributions noted above.

An amended report from the Committee was received on March 15, 1982. The Committee substantially complied with the recommendations in the interim report.

### Recommendation

The Audit staff recommends no further action with respect to disclosure of contributor information.

#### B. Disclosure of Expenditure Information

Section 434(b) (5) (A) of Title 2 of the United States Code states, in part, that each report shall disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure.

Section 104.3(b) (3) (B) of Title 11 of the Code of Federal Regulations states, in part, that examples of statements or descriptions which meet the requirements of 11 C.F.R. 104.3(b) (3) for the "purpose" of why a disbursement was made include the following: dinner expenses, media, salary, polling, travel, party fees, phone banks, travel expenses, travel expense reimbursement, and catering costs. However, statements or descriptions such as "advance", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote", and "voter registration", would not meet the requirements of 11 C.F.R. 104.3(b) (3) for reporting the purpose of an expenditure.

During the review of the Committee's disclosure reports, it was noted that the Committee did not provide the address of the payee and the date of the disbursement for 54 disbursements totaling \$67,139.07 or 100% of the total number and the total dollar value of itemizable disbursements. In addition, the Committee disclosed descriptions for the "purpose" of disbursements which did not satisfy the provisions of 11 C.F.R. 104.3(b) (3) for 12 disbursements totaling \$7,360.90. This represents 22.2% of the number of itemizable disbursements and 11% of the dollar value. The Committee stated that this was a result of an oversight and a misunderstanding of the Regulation. The Committee agreed to amend its reports in accordance with the Regulation.

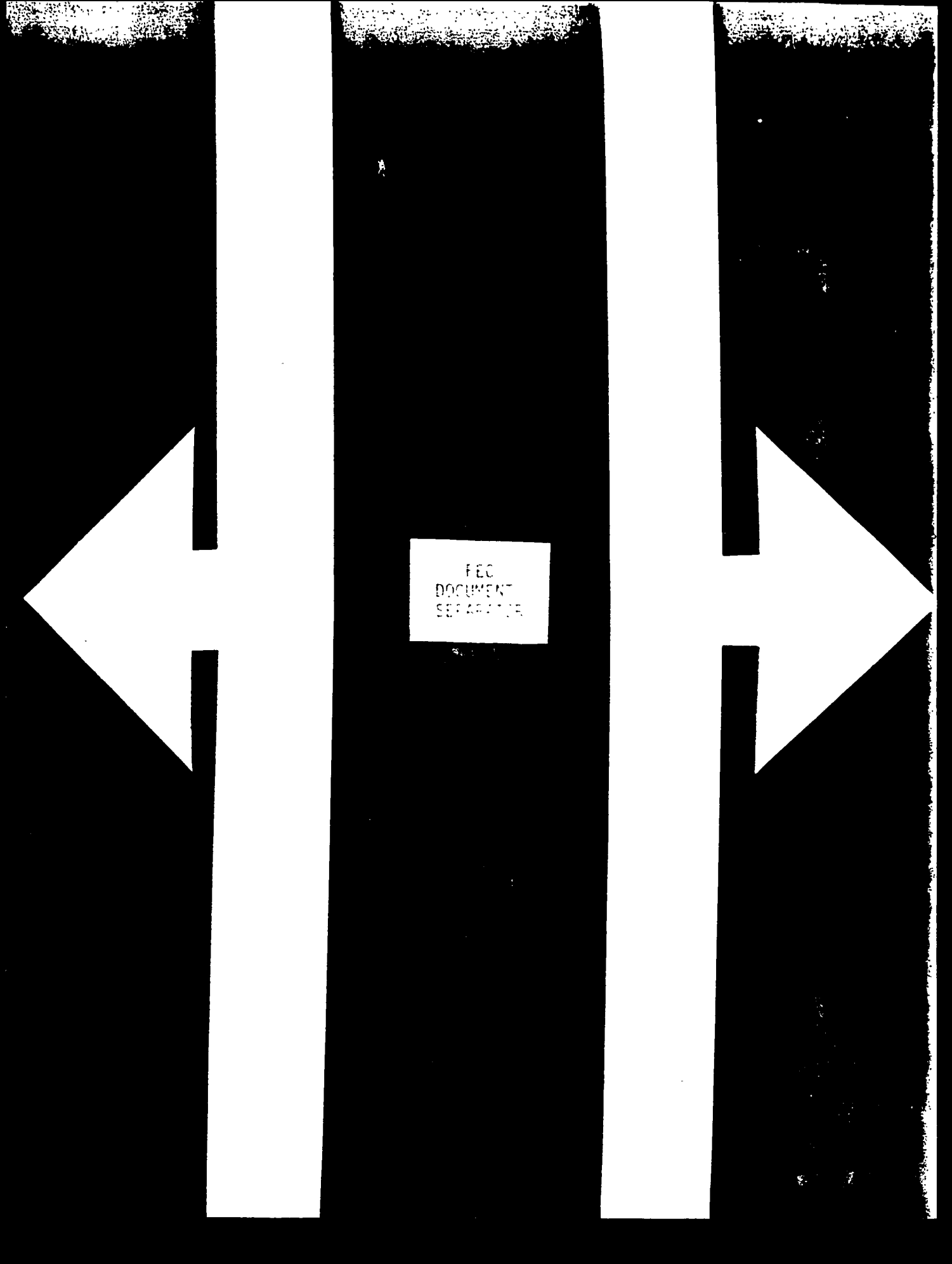
The Audit Division recommended that the Committee, within 30 days of receipt of the interim report, amend its reports to disclose the addresses of the payees, the date of the disbursements and descriptions, for the "purpose" in accordance with 11 C.F.R. 104.3(b) (3) for the disbursements noted above.

An amended report from the Committee was received on March 15, 1982. The Committee substantially complied with the recommendations in the interim report.

Recommendation

The Audit staff recommends no further action.

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