

Michael J. Brandi
Executive Director
Connecticut State Elections Enforcement Commission
20 Trinity Street, Suite 101
Hartford, CT 06106

Dear Mr. Brandi:

We write with concern over what we believe to be major and long-standing violations of Connecticut's campaign finance laws by the National Rifle Association of America (hereinafter referred to as the "NRA"), the National Rifle Association of America Political Victory Fund and the NRA Political Victory Fund.

The National Rifle Association of America Political Victory Fund (hereinafter referred to as the "NRA Federal PAC") is a federal political committee registered with the Federal Election Commission (ID Number C00053553) at 11250 Waples Mill Road, Fairfax, VA 22020.¹ The National Rifle Association also purports to operate a separate ongoing committee in Connecticut, the NRA Political Victory Fund (hereinafter referred to as the "NRA Connecticut PAC") at 7 Kyle Court, Oxford, CT 06478. Chris W. Cox has served simultaneously as the chairman of the NRA Federal PAC and the NRA Connecticut PAC since January 19, 2007. Mary Rose Jennison Adkins is the treasurer of the NRA Federal PAC and served, simultaneously, as the deputy treasurer of the NRA Connecticut PAC from January 1, 1998 through May 14, 2007. Kristi Novin has served as the treasurer of the NRA Connecticut PAC since December 12, 2008. Her predecessor, Janet S. Crook, served as the treasurer of the NRA Connecticut PAC from January 1, 1998 through April 11, 2008 when the NRA Connecticut PAC was located at 408 Cope Road, Madison, CT 06443. The NRA Connecticut PAC had neither a treasurer nor a deputy treasurer from April to December of 2008.

The most recent Statement of Organization (FEC Form 1) filed by the NRA Federal PAC lists its campaign depository as Wachovia Bank, N.A., 10501 Main Street, Fairfax, VA 22030. The most recent Political Committee (PAC) Registration (SEEC Form 3) filed by the NRA Connecticut PAC lists its depository institution as Wachovia Bank, 600 Boston Post Road, Madison, CT 06443. Wachovia Bank, N.A., was acquired by Wells Fargo & Company in 2008.

As we explain below, we believe that public documents indicate that NRA Federal PAC and NRA Connecticut PAC have violated Connecticut campaign rules by:

1. Improperly making at least \$9,000 in campaign contributions to state lawmakers from the federal committee; and
2. Improperly transferring more than \$20,000 from the Federal PAC to the Connecticut PAC.

Overview of Applicable State Law

For nearly thirty years, the Connecticut State Elections Enforcement Commission (hereinafter

¹ See [Statement of Organization](http://images.nictusa.com/pdf/549/29991743549/29991743549.pdf) here or refer to URL <http://images.nictusa.com/pdf/549/29991743549/29991743549.pdf>

referred to as "SEEC") has interpreted Connecticut campaign finance law as prohibiting federal political committees from making contributions to Connecticut state candidates.

A Guide for Political Committees summarizes the law as follows:

A political committee registered with the Federal Election Commission under federal law or with another state other than Connecticut may not make contributions or expenditures to or for the benefit of a Connecticut state or municipal candidate or a Connecticut political committee or party committee. A separate committee must first be registered in Connecticut (by filing a SEEC Form 3, designating a treasurer and a depository institution situated in Connecticut) and then must solicit funds specifically for use in Connecticut campaigns in accordance with Connecticut's campaign finance laws. There is one exception to this strict rule – a national committee of a political party may use its federal account to make contributions to an ongoing political committee.

Treasurers receiving such contributions from entities not registered as committees in Connecticut must return the contributions immediately to the donor. Treasurers should check with the town clerk and the State Elections Enforcement Commission to determine whether a committee is properly registered to make contributions in Connecticut. [General Statutes §§ 9-602(a), 9-618(e); Opinion of Counsel 1986-2]

Connecticut State Elections Enforcement Commission, A Guide for Political Committees at 13 (rev. January 2014).

Opinion of Counsel 1986-2 is even more specific regarding the restrictions on federal political committees seeking to influence Connecticut state elections:

The Corporate PAC could not simply transfer any of its existing funds to the newly established Connecticut political committee (Connecticut PAC). New funds must be solicited by the Connecticut PAC subject to the disclosure requirements of Sections 9-348h or 9-348p, as the case may be, and to the limitations imposed by Section 9-348s, General Statutes. Persons solicited by the Connecticut PAC must be notified at the time of solicitation. If the solicitation is conducted jointly with the Corporate PAC, the persons solicited must be given the opportunity to designate the portion of their contributions to be allocated to the Connecticut PAC to ensure both the voluntary nature of the contribution and compliance with state disclosure requirements.

Opinion of Counsel 1986-2 at 2.

Accordingly, Connecticut campaign finance law prohibits a federal political committee from simply transferring funds to an affiliated Connecticut ongoing committee. Instead, the Connecticut ongoing committee must raise funds separately and must inform potential contributors that their funds will be used in Connecticut elections.

We believe that the NRA Federal PAC and the NRA Connecticut PAC have been violating both of these requirements since at least 2003 in a manner akin to practices found to violate similar

election laws in Rhode Island.

Rhode Island Consent Decree

In early 2014, the Rhode Island Board of Elections entered into a \$63,000 consent decree with the National Rifle Association for major campaign finance violations revealed as a result of an investigation into the NRA’s finances conducted by the Rhode Island Progressive Democrats. This was the second largest such settlement in Rhode Island history. The essence of the violation was that the NRA was illegally funding its state PAC from its federal PAC. The Rhode Island Board of Elections found that the NRA federal PAC and its Rhode Island affiliate, the NRA Political Victory Fund PAC (hereinafter the NRA RI PAC), shared a single bank account, which was the source account that the NRA RI PAC used to distribute its contributions. Because the NRA RI PAC's reports did not reflect the shared account, the NRA RI PAC's reports were inaccurate. In order to comply with Rhode Island campaign finance law, "the NRA RI PAC should have received individual contributions aggregating no more than \$100 from individuals in a calendar year and deposited into its own separate bank account, and made disbursements from this account." State of Rhode Island Board of Elections, In re: NRA POLITICAL VICTORY FUND PAC (National Rifle Association), Consent Decree at 1 (January 14, 2014)(attached hereto as Exhibit A).

We believe that violations similar to those uncovered in Rhode Island have occurred in Connecticut.

Summary of NRA’s Unlawful Conduct in Connecticut

Our research has found that the NRA has violated Connecticut campaign finance laws in two ways. First, it appears that the NRA made contributions to state lawmakers from the Federal PAC. The primary evidence of this violation is that the NRA reported contributions to state lawmakers on both the state and federal PAC reports. For example, here is a record of a \$500 contribution from the CT PAC to the Winkler for Senate committee on October 18, 2006, taken from the CT PAC reports.

Winkler for Senate 151 Pamela Ave. Groton, CT 06340	C			<input type="checkbox"/> In-Kind Cntrb <input type="checkbox"/> Ind Exp <input type="checkbox"/> Reimb Claimed	1292	10/18/2006	500.00
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Here is a matching record of the donation from the federal PAC reports:

C. Full Name (Last, First, Middle Initial) Winkler for Senate		Transaction ID: 17453182 Date of Disbursement <table border="1"> <tr> <td>M</td><td>M</td><td>/</td><td>D</td><td>D</td><td>/</td><td>Y</td><td>Y</td><td>Y</td><td>Y</td> </tr> <tr> <td>1</td><td>0</td><td></td><td>1</td><td>8</td><td></td><td>2</td><td>0</td><td>0</td><td>6</td> </tr> </table>		M	M	/	D	D	/	Y	Y	Y	Y	1	0		1	8		2	0	0	6
M	M	/	D	D	/	Y	Y	Y	Y														
1	0		1	8		2	0	0	6														
Mailing Address 151 Pamela Avenue		Amount of Each Disbursement this Period <table border="1"> <tr> <td>500.00</td> </tr> </table>		500.00																			
500.00																							
City Groton	State CT	Zip Code 06340	011 Category/ Type																				
Purpose of Disbursement Lenny Winkler, STATE SENATE CT		Disbursement For: 2006 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼																					
Candidate Name Lenny Winkler		Lenny Winkler, STATE SENATE CT																					
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President	State: CT District: 18																						

No itemized contributors were listed; rather, all the money was listed as contributions under \$30, which do not require the disclosure of donor names. Due to the double-listing of contributions on the federal and state reports, we believe the ultimate source of the money is the NRA Federal PAC. This practice is illegal in Connecticut.

Since 2003, we have been able to identify at least \$9,000 in contributions the NRA made to Connecticut political committees from funds we believe were illegally funneled from the NRA Federal PAC. Each of these contributions was listed on the NRA Federal PAC reports.

3/18/03	RON SAN ANGELO, LOCAL CT	\$250.00
10/31/03	VOID - JOE BANGO FOR STATE HOUSE	(\$250.00)
10/15/04	JAMES AMANN, STATE HOUSE 118TH CT	\$250.00
10/15/04	BOB PETERS, STATE HOUSE 30TH CT	\$250.00
10/15/04	ROBERT WARD, STATE HOUSE 86TH CT	\$250.00
10/15/04	JOHN KISSEL, STATE SENATE CT	\$500.00
10/15/04	STEPHEN JARMOC, STATE HOUSE 59TH CT	\$250.00
10/15/04	CATHERINE COOK, STATE SENATE CT	\$500.00
10/15/04	STEPHEN DARGAN, STATE HOUSE 115TH CT	\$250.00
10/15/04	DEBRALEE HOVEY, STATE HOUSE 112ND CT	\$250.00
10/15/04	ANTHONY GUERRERA, STATE HOUSE 29TH CT	\$250.00
10/15/04	STEVEN T. MIKUTEL, STATE HOUSE 45TH CT	\$250.00
10/15/04	TERRY BACKER, STATE HOUSE 121ST CT	\$250.00
10/15/04	LEN GREENE, STATE HOUSE 105TH CT	\$250.00
10/15/04	TONY GUGLIELMO, STATE SENATE CT	\$500.00
10/15/04	DAVID LABRIOLA, STATE HOUSE 131ST CT	\$250.00
10/15/04	MICHAEL CARON, STATE HOUSE 44TH CT	\$250.00
10/15/04	EDWARD MOUKAWSHER, STATE HOUSE 40TH CT	\$250.00
10/15/04	RICHARD ROY, STATE HOUSE 119TH CT	\$250.00
1/4/05	CT HOUSE DEMOCRATIC CAMPAIGN COMMITTEE	\$500.00
1/4/05	CT HOUSE REPUBLICAN CAMPAIGN COMMITTEE	\$500.00
5/18/05	ROCKY HILL DEMOCRATIC TOWN COMMITTEE	\$300.00
5/18/05	RON SAN ANGELO, LOCAL CT	\$250.00
5/31/05	VOID - FRIENDS OF TERRY BACKER	(\$250.00)

7/27/06	AL ADINOLFI, STATE HOUSE 103RD CT	\$250.00
7/27/06	MINNIE GONZALEZ, STATE HOUSE 03RD CT	\$250.00
8/1/06	EMIL ALTOBELLO, STATE HOUSE 82ND CT	\$250.00
8/1/06	ANTHONY GUERRERA, STATE HOUSE 29TH CT	\$250.00
8/1/06	PENNY BACCHIOCHI, STATE HOUSE 52ND CT	\$250.00
10/12/06	JOE ARESIMOWICZ, STATE HOUSE 30TH CT	\$250.00
10/12/06	DAN MCCANN, STATE HOUSE 99TH CT	\$250.00
10/12/06	STEVEN T. MIKUTEL, STATE HOUSE 45TH CT	\$250.00
10/12/06	VOID - ROCKY HILL DEMOCRATIC TOWN COMMIT	(\$300.00)
10/18/06	JOHN KISSEL, STATE SENATE CT	\$500.00
10/18/06	PAUL DOYLE, STATE HOUSE 28TH CT	\$500.00
10/18/06	LENNY WINKLER, STATE SENATE CT	\$500.00
3/31/09	VOID - DOYLE FOR STATE SENATE	(\$500.00)
2003-2014	Total	\$9,000.00

Second, the NRA appears to have violated state law when the NRA Federal PAC transferred \$20,794 to the NRA Connecticut PAC. As shown below, the NRA Connecticut PAC's Pre-General 2006 report (attached hereto as Exhibit B) reports \$20,794 in receipts from un-itemized contributors giving \$30 or less in 24 days of October 2006. Those funds were largely unused until 2014, when the NRA Connecticut PAC made several thousand dollars in independent expenditures.

A. Total contributions from small contributors - Received this Period Only	
(Small contributors are those whose total monetary contributions for all periods have not exceeded \$30)	
Subtotal Section A	\$ 20,794.00
B. Contributions from individuals over \$30 in the Aggregate (SEE INSTRUCTIONS FOR WHAT INFORMATION MUST BE DISCLOSED)	

These unitemized contributions totaling \$20,794 are particularly concerning given the history of apparent improprieties involving the Federal PAC discussed above. It appears that some or all of the \$20,794 was not, in fact, raised by the NRA Connecticut PAC in very small donations but, instead, was raised by and transferred from the NRA Federal PAC without notice to the contributors that the funds would be used in Connecticut. Given the Connecticut PAC's unclear bank account status during the period leading up to this disclosure, the true source of these funds requires further investigation.

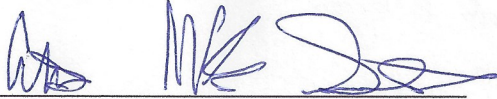
In Connecticut, it is illegal for federal PACs to contribute to Connecticut candidates. Such PACs must create a separate PAC in the state, and segregate funds that were solicited specifically for use in Connecticut. We believe the NRA Connecticut PAC did not do this when they raised \$20,000 in 2006, and their actions constitute a violation of Connecticut's ban on federal PAC contributions. Moreover, we believe that the more than \$9,000 the NRA spent on Connecticut state candidates from the NRA Federal PAC (double-listed on the NRA Connecticut PAC reports) also violated Connecticut law.

Conclusion

In conclusion, we believe there is very compelling evidence that the NRA has violated

Connecticut's campaign finance laws by funding the NRA Connecticut PAC utilizing funds from, and solicited by, the NRA Federal PAC, laundering federal money through the NRA Connecticut PAC to contribute to state candidates in Connecticut.

We solemnly swear (or affirm) that the above statement is true and accurate to the best of our knowledge and belief.

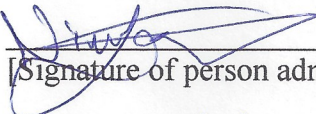


Carlos Mathew Soto
158 Knowlton Street
Stratford CT 06615
203-526-6668

8/11/15

Date

Sworn and subscribed before me on this 11 day of August, 2015



[Signature of person administering oath]

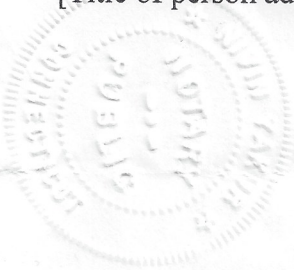
Ninimakis

[Name of person administering oath]

FSA

[Title of person administering oath]

*(My Commission Expires
January 31, 2019)*



We solemnly swear (or affirm) that the above statement is true and accurate to the best of our knowledge and belief.

Po Murray

Po Murray
38 Charter Ridge Drive
Sandy Hook, CT 06482
203-270-8774

08/06/2015
Date

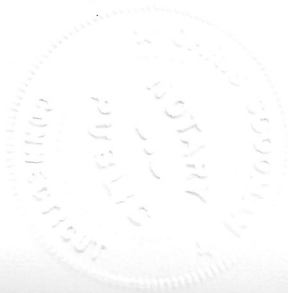
Sworn and subscribed before me on this ⁰⁶ 6th day of August, 2015

Chris Goodman
[Signature of person administering oath]

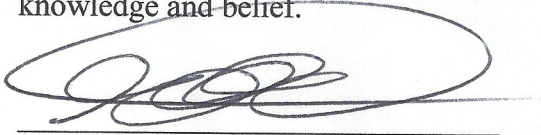
Chris Goodman
[Name of person administering oath]

Notary Public
[Title of person administering oath]

**My Commission Expires
May 31, 2019**



We solemnly swear (or affirm) that the above statement is true and accurate to the best of our knowledge and belief.



Samuel W. Bell
168 Elmgrove Avenue
Providence, RI 02906
401-680-0725

July 25, 2015
Date

Sworn and subscribed before me on this 25th day of July, 2015

Tina M Lajoie
[Signature of person administering oath]

Tina M. Lajoie
[Name of person administering oath]

Notary Public
[Title of person administering oath]

TINA M LAJOIE
Notary Public
Connecticut
My Commission Expires May 31, 2017



We solemnly swear (or affirm) that the above statement is true and accurate to the best of our knowledge and belief.

Duncan Weinstein

Duncan Weinstein
548 W. Belden Avenue
Chicago Il 60614
773-899-4804

07/25/15
Date

Sworn and subscribed before me on this 25th day of July, 2015

Tina M. Lajoie
[Signature of person administering oath]

Tina M. Lajoie
[Name of person administering oath]

Notary Public
[Title of person administering oath]

TINA M LAJOIE
Notary Public
Connecticut
My Commission Expires May 31, 2017



We solemnly swear (or affirm) that the above statement is true and accurate to the best of our knowledge and belief.


Sarah Clements
9 Pond Brook Road
Newtown, CT 06470
203-512-9483

8.17.15
Date

Sworn and subscribed before me on this 17 day of August, 2015


[Signature of person administering oath]

Anne Gartland
[Name of person administering oath]

notary
[Title of person administering oath]

ANNE J. GARTLAND
NOTARY PUBLIC
MY COMMISSION EXPIRES MAY 31, 2018

