



CONNECTICUT REPUBLICANS

REPUBLICANS WORK, YOU WIN.

October 26, 2010

VIA HAND-DELIVERY

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Complaint Against Richard Blumenthal and Blumenthal for Senate

Dear Mr. Hughey:

This letter constitutes a formal complaint filed pursuant to 2 U.S.C. §437g(a)(1) against Richard Blumenthal, the Democratic nominee for United States Senate in Connecticut, and Blumenthal for Senate, Mr. Blumenthal's principal campaign committee. Based upon information and belief, set forth below and in the attached materials, the Connecticut Republican Party files this complaint seeking an immediate and thorough investigation by the Federal Election Commission ("FEC" or "Commission") into Mr. Blumenthal's so-called personal loans to his campaign committee. As demonstrated below, there is reason to believe that Mr. Blumenthal's loans to his campaign are patently illegal under the Federal Election Campaign Act of 1971, as amended ("Act"), and have caused Mr. Blumenthal's campaign committee to file false reports to the Commission in violation of 18 U.S.C. § 1001.

I. Factual Background

On March 4, 2010, Cynthia Blumenthal made two \$2,400 contributions to Mr. Blumenthal's campaign, one designated for the primary election and the other designated for the general election. *See* April Quarterly Report (1/1/2010 – 3/31/2010), Schedule A at 25-26 (relevant portions attached as Exhibit 1). Given these contributions, Mrs. Blumenthal is legally barred from making any further contributions to Mr. Blumenthal's campaign.

On April 19, 2010, Mr. Blumenthal filed his personal financial disclosure report ("PFD Report"), as required by U.S. Senate Ethics Rules, with the Secretary of the Senate. The PFD Report indicated that Mr. Blumenthal's personal assets, excluding those belonging solely to his wife, totaled between \$599,000 and \$1.36 million. *See* United States Senate Financial Disclosure Report for Richard Blumenthal, Apr. 19, 2010 (attached as Exhibit 2). Mr. Blumenthal's share of joint assets held with his wife totaled between \$83,000 and \$207,500. *See id;* *see also* Deirdre Shesgreen,

U.S. Senate Candidates Disclose Assets, The CT Mirror, June 22, 2010, <http://ctmirror.org/story/6515/blumenthalmcmahonfinances> (attached as Exhibit 3). As such, Mr. Blumenthal's overall personal assets as of the spring of this year totaled between \$682,000 and \$1,567,500.

On September 30, 2010, Mr. Blumenthal loaned his campaign committee \$500,000 from his personal funds. *See* October Quarterly Report (7/1/2010 – 9/30/2010), Schedule C at 843 (relevant portions attached as Exhibit 4).

On October 7, 2010, Mr. Blumenthal loaned his campaign committee \$1.75 million from his personal funds. *See* 12-Day Pre-General Report (10/1/2010 – 10/13/2010), Schedule C at 138-39 (relevant portions attached as Exhibit 5).

As of the closing reporting date for the Blumenthal campaign's most recent FEC Report, or as of October 13, 2010, Mr. Blumenthal has loaned his campaign committee a total of \$2.25 million. *See id.*

II. Applicable Law

Commission regulations provide that "candidates for Federal office may make unlimited expenditures from personal funds." 11 C.F.R. § 110.10. Commission regulations define personal assets as "[a]mounts derived from any asset that, under applicable State law, at the time the individual became a candidate, the candidate had legal right of access to or control over, and with respect to which the candidate had (1) legal and rightful title; or (2) an equitable interest." 11 C.F.R. § 100.33(a). Commission regulations further define the personal share of jointly owned assets as "[a]mounts derived from a portion of assets that are owned jointly by the candidate and the candidate's spouse . . . [i]f no specific share is indicated by an instrument of conveyance or ownership, the value of one-half of the property." 11 C.F.R. § 100.33(c).

In addition, Commission regulations provide that "[a] gift, subscription, loan (except for a loan made in accordance with 11 C.F.R. §§ 100.72 and 100.73), advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office is a contribution." 11 C.F.R. § 100.52(a). Commission regulations also provide that:

A loan that exceeds the contribution limitations of 2 U.S.C. § 441a and 11 C.F.R. part 100 shall be unlawful whether or not it is repaid.

A loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid. The aggregate amount loaned to a candidate or committee by a contributor, when added to other contributions from that individual to that candidate or committee, shall not exceed the contribution limitations set forth at 11 C.F.R. part 110.

11 C.F.R. § 100.52(b)(1-2).

As such, Commission regulations allow federal candidates to make unlimited loans of personal funds to their campaign committees, which are considered to be contributions from the candidate to his campaign committee to the extent the personal loans remain unpaid. However, contributions from the spouses of candidates and other family members are subject to the Act's strict contribution limits. *See, e.g.,* MUR 5138, Ferguson for Congress (finding reason to believe that Ferguson for Congress, Representative Michael Ferguson, and Thomas and Roberta Ferguson, Representative Ferguson's parents, violated the Act with respect to funds paid to Representative Ferguson from a family trust and accepted by the campaign and imposing a \$210,000 civil penalty). *See also Buckley v. Valeo*, 424 U.S. 153 (1976) ("The prevention of actual and apparent corruption of the political process does not support the limitation on the candidate's expenditure of his own personal funds. . . . Although the risk of improper influence is somewhat diminished in the case of large contributions from immediate family members, we cannot say that the danger is sufficiently reduced to bar Congress from subjecting family members to the same limitations as nonfamily contributors."). Likewise, loans from the spouses of candidates are also subject to the Act's strict contribution limits.

Additionally, Commission regulations state that:

No person shall—(i) make a contribution in the name of another; (ii) knowingly permit his or her name to be used to effect that contribution; (iii) knowingly help or assist any person in making a contribution in the name of another; or (iv) knowingly accept a contribution made by one person in the name of another.

11 C.F.R. § 110.4(b)(1)(i – iv).

III. There is Reason to Believe That Mr. Blumenthal's Loans to his Campaign Committee Actually Consist of Mrs. Blumenthal's Personal Funds, Resulting in an Excessive Contribution and an Illegal Contribution Made in the Name of Another

There is reason to believe that a portion of Mr. Blumenthal's personal loans to his campaign committee consist of funds other than Mr. Blumenthal's personal funds and consist of Mrs. Blumenthal's personal funds. As of October 13, 2010, Mr. Blumenthal had loaned his campaign \$2,250,000 from "personal" funds. However, Mr. Blumenthal's PFD Report discloses the maximum value of his personal assets – including solely personal assets and Mr. Blumenthal's one-half share of assets jointly held with Mrs. Blumenthal – total no more than \$1,567,500. Accordingly, Mr. Blumenthal's own disclosure reports indicate that at least \$682,500 and as much as \$1,568,000 of his "personal" loans to his campaign committee were not made with Mr. Blumenthal's personal funds. If the personal loans were drawn from accounts jointly held with Mrs. Blumenthal and in amounts greater than Mr. Blumenthal's legal share, Mrs. Blumenthal made excessive contributions to her husband's campaign in the form of a loan. Mrs. Blumenthal has already made maximum contributions to her husband's campaign.

In addition, Mr. Blumenthal's campaign committee reports indicate that the personal loans were from Mr. Blumenthal's personal funds. Therefore, if any portion of Mr. Blumenthal's personal loan to his campaign committee consisted of Mrs. Blumenthal's personal funds, Mr. and Mrs. Blumenthal have violated the Act by making a contribution in the name of another.

IV. **There is Reason to Believe that the Blumenthal Campaign Filed False FEC Reports in Violation of 18 U.S.C. § 1001**

Finally, federal criminal law provides that:

[W]hoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years. . . .

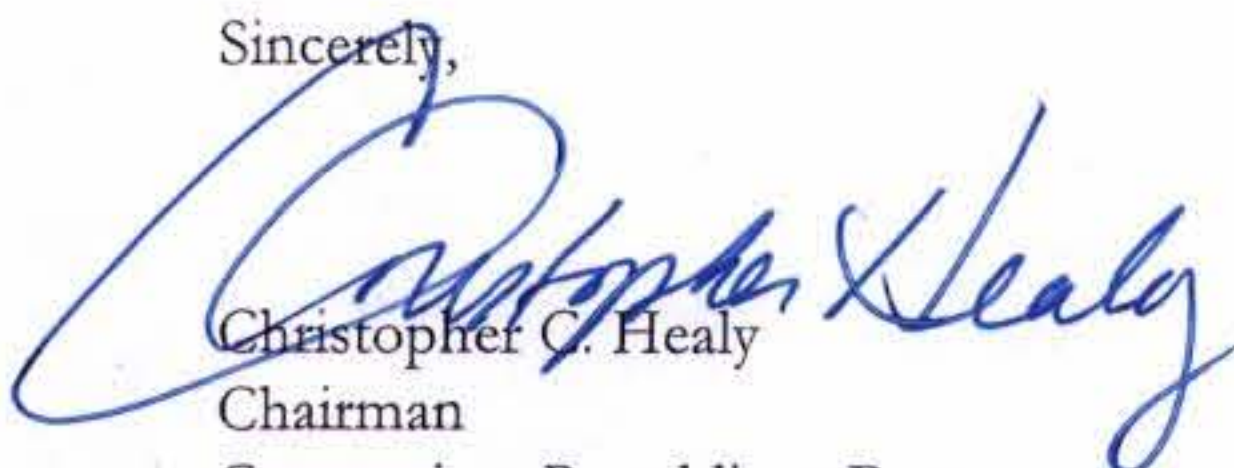
18 U.S.C. § 1001.

If Mr. Blumenthal and his campaign committee knew that Mr. Blumenthal's "personal" loans partially consisted of Mrs. Blumenthal's personal funds, and yet disclosed the funds as being solely those of Mr. Blumenthal on the campaign committee's FEC reports, then Mr. Blumenthal and the Blumenthal Campaign may have violated federal criminal law by knowingly filing false FEC reports with the Commission.

For all of the foregoing reasons, the Connecticut Republican Party urges the Commission to conduct an immediate and thorough investigation into Mr. Blumenthal's loans to his campaign committee, impose the maximum penalty under the Act for any legal violations that occurred, and refer the matter to the Department of Justice ("DOJ") for any legal violations found to be within DOJ's jurisdiction.

The above is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,



Christopher C. Healy
Chairman
Connecticut Republican Party

Attachments

Christopher Hughey, Esq.
Federal Election Commission
Page 5

SWORN TO AND SUBSCRIBED before me on this 26TH day of October, 2010. *At New Britain, CT*

Michael Argento
Notary Public

My commission expires:

MICHAEL ARGENTO
NOTARY PUBLIC
MY COMMISSION EXPIRES AUG 31 2012

Exhibit 1

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(a)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 25 / 501
(check only one)
 11a 11b 11c 11d
 12 13a 13b 14 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Blumenthal for Senate

A. Full Name (Last, First, Middle Initial) Clara Mae Blumenthal Mailing Address 145 Clapboard Ridglet Road City Greenwich State CT Zip Code 06831 FEC ID number of contributing federal political committee. C		Date of Receipt 02 / 02 / 2010 Transaction ID: C2576301 Amount of Each Receipt this Period 2400.00
Name of Employer Not Employed Occupation Student Election Cycle-to-Date Receipt For: 2010 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		4800.00
B. Full Name (Last, First, Middle Initial) Clara Mae Blumenthal Mailing Address 145 Clapboard Ridglet Road City Greenwich State CT Zip Code 06831 FEC ID number of contributing federal political committee. C		Date of Receipt 02 / 02 / 2010 Transaction ID: C2576300 Amount of Each Receipt this Period 2400.00
Name of Employer Not Employed Occupation Student Election Cycle-to-Date Receipt For: 2010 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Convention		4800.00
C. Full Name (Last, First, Middle Initial) Cynthia M. Blumenthal Mailing Address 145 Clapboard Ridge Road City Greenwich State CT Zip Code 06831 FEC ID number of contributing federal political committee. C		Date of Receipt 03 / 04 / 2010 Transaction ID: C2617782 Amount of Each Receipt this Period 2400.00
Name of Employer Not Employed Occupation Not Employed Election Cycle-to-Date Receipt For: 2010 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		4800.00
SUBTOTAL of Receipts This Page (optional)		7200.00
TOTAL This Period (last page this line number only)		7200.00

FEC Schedule A (Form 3) (Revised 02/2009)

10020293585

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: PAGE 38 / 501
(check only one)
 11a 11b 11c 11d
 12 13a 13b 14 15

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Blumenthal for Senate

<p>A. Full Name (Last, First, Middle Initial) Cynthia M. Blumenthal</p> <p>Mailing Address 145 Clapboard Ridge Road</p> <p>City <u>Greenwich</u> State <u>CT</u> Zip Code <u>06831</u></p> <p>FEC ID number of contributing federal political committee. <u>C</u></p> <p>Name of Employer Not Employed</p> <p>Occupation Not Employed</p> <p>Receipt For: 2010 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <u>Convention</u></p> <p>Election Cycle-to-Date <u>4800.00</u></p>		<p>Date of Receipt <input type="text"/> / <input type="text"/> / <input type="text"/> <u>03</u> / <u>04</u> / <u>2010</u></p> <p>Transaction ID: C2517781</p> <p>Amount of Each Receipt this Period <input type="text"/> <u>2400.00</u></p>
<p>B. Full Name (Last, First, Middle Initial) David J. Blumenthal</p> <p>Mailing Address 145 Clapboard Ridge Road</p> <p>City <u>Greenwich</u> State <u>CT</u> Zip Code <u>06831</u></p> <p>FEC ID number of contributing federal political committee. <u>C</u></p> <p>Name of Employer Not Employed</p> <p>Occupation Student</p> <p>Receipt For: 2010 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <u></u></p> <p>Election Cycle-to-Date <u>4800.00</u></p>		<p>Date of Receipt <input type="text"/> / <input type="text"/> / <input type="text"/> <u>02</u> / <u>02</u> / <u>2010</u></p> <p>Transaction ID: C2578302</p> <p>Amount of Each Receipt this Period <input type="text"/> <u>2400.00</u></p>
<p>C. Full Name (Last, First, Middle Initial) David J. Blumenthal</p> <p>Mailing Address 145 Clapboard Ridge Road</p> <p>City <u>Greenwich</u> State <u>CT</u> Zip Code <u>06831</u></p> <p>FEC ID number of contributing federal political committee. <u>C</u></p> <p>Name of Employer Not Employed</p> <p>Occupation Student</p> <p>Receipt For: 2010 <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <u>Convention</u></p> <p>Election Cycle-to-Date <u>4800.00</u></p>		<p>Date of Receipt <input type="text"/> / <input type="text"/> / <input type="text"/> <u>02</u> / <u>02</u> / <u>2010</u></p> <p>Transaction ID: C2576304</p> <p>Amount of Each Receipt this Period <input type="text"/> <u>2400.00</u></p>
<p>SUBTOTAL of Receipts This Page (optional) <u>7200.00</u></p>		<p><u>7200.00</u></p>
<p>TOTAL This Period (last page this line number only)</p>		<p><u></u></p>

10020293586

Exhibit 2

Due to its volume, Mr. Blumenthal's
Personal Financial Disclosure Report is available upon request.

Exhibit 3



Published on *The Connecticut Mirror* (<http://ctmirror.org>)

[Home](#) > U.S. Senate candidates disclose assets

U.S. Senate candidates disclose assets

Alternate Headline:

none

[Deirdre Shesgreen](#)

June 22, 2010

When viewed through the prism of personal finances, the U.S. Senate contest is a matter of who has more zeros.

Democrat [Richard Blumenthal](#), Connecticut's attorney general, reported combined household assets last year of up to \$124 million, including a checking account owned by his wife Cynthia with more than \$1 million in it and multimillion-dollar trusts for each of their three dependent children. Blumenthal's own holdings, though, represent just a fraction of that: between \$599,00 and \$1.36 million in two investment accounts.

His principal opponent, endorsed Republican candidate [Linda McMahon](#), reported hundreds of investments, including one valued at between \$25 million and \$50 million at the end of last year. On her disclosure forms, McMahon's husband, Vince McMahon, got to check the "over \$50 million" box—the highest value available, with no upper limit—when reporting one of his investments in the family business, World Wrestling Entertainment Inc.

A third candidate, businessman [Peter Schiff](#), who has qualified for the GOP primary, is also a multimillionaire. Although Schiff did not file a 2010 disclosure report (he got two extensions from the Senate ethics committee), he did file one last year. That report, covering his 2008 holdings, shows assets worth at least \$64.7 million and as much as \$91.6 million. He, too, got to check the "over \$50 million" box when disclosing the value of his holdings in Euro Pacific Capital Inc., the brokerage firm Schiff started in 1996.

In short, this is no poor man's political contest. It's a battle of millionaires—a potential political turnoff at a time when so many Americans are struggling in a tough economy.

So far, much of the attention has focused on McMahon's wealth, in large part because of her pledge to spend as much as \$50 million on her Senate bid, not to mention the estimated \$1 billion value of WWE. The wrestling empire has already attracted significant negative attention, including questions about steroid use by performers and the heavy emphasis on sex and violence in wrestling showdowns.

U.S. Senate candidates' assets	
Richard Blumenthal	
Richard Blumenthal	\$599,000 to \$1.36 million
Cynthia Blumenthal	\$55.36 million to \$107 million
Jointly owned	\$166,000 to \$415,000
Blumenthal children	\$7.74 million to \$15.67 million
Total Value of Assets	\$63.87 million to \$124 million
Linda McMahon	
Linda McMahon	\$36.3 million to \$80.7 million
Vince McMahon	\$55.2 million to \$69 million
Jointly owned	\$64.5 to \$250 million
Total Value of Assets	\$156 million to \$400 million
Peter Schiff	\$64.7 million to \$91.6 million

There's no question that McMahon's wealth is eye-popping. Lawmakers and congressional candidates only have to report their assets in broad ranges, and they can exclude certain holdings, such as their primary residence, so an exact tally of net worth is impossible. But even without those details, McMahon's disclosure forms show the total value of her and her husband's reportable assets ranged between \$156 million and \$400 million in 2009.

Blumenthal's total reportable assets—including the considerable resources of his wife and their children—ranged between nearly \$64 million and \$124 million.

Most of that money stems from his Cynthia Blumenthal's holdings; the assets held by him individually or jointly with his wife totaled less than \$2 million. The daughter of Peter Malkin, a New York real estate magnate who heads an investment group that owns the Empire State Building and other properties, Cynthia Blumenthal's personal assets were worth at least \$55 million and as much as \$107 million in 2009.

No matter who wins this race, any of these candidate would likely rank among the top ten richest lawmakers in Congress in terms of household wealth. McMahon could even end up in the No. 1 or No. 2 spot. According to the most recently ranking, based on an analysis of the 2008 disclosure reports by the non-partisan Center for Responsive Politics (CRP), the richest lawmaker in Congress now is Rep. Darrell Issa, a California Republican whose net worth was between \$164 million and \$337 million.

Based on that tally of 2008 figures, Blumenthal and Schiff would land on the lower end of the richest-members scale, although minus his wife and children's assets, Blumenthal would slip down precipitously. Most of his assets are held in two trusts, with the largest investment—in the Rockefeller Global Equity Fund II—worth between \$250,000 to \$500,000.

Cynthia Blumenthal's money is invested in a wide range of real estate, hedge funds, and private equity ventures. She lists four holdings in the Empire State Building Associates LLC, worth at least \$2.5 million and possibly much more. (Spouses do not have to provide as much detail for investments held individually.)

McMahon's report, which runs about 100 pages, shows a huge portfolio of investments. The stock in WWE is, of course, the biggest single chunk. Vince McMahon reports holding more than \$51 million in WWE stock, with no upper limit indicated, and Linda McMahon is listed as owning between \$5 million to \$25 million in company stock. The company's website states that total revenues for the first quarter of 2010 were \$138.7 million, and net income was \$24.7 million.

Besides WWE, the McMahons listed more than 500 joint investments, including small amounts of stock in a gamut of companies, from AT&T and Chevron Corp. to Xerox and Walt Disney. The reports show, for example, between \$1,000 and \$15,000 in Rolls Royce stock, and the same amount in Nissan Motor Co. They had \$15,000 to \$50,000 invested in Berkshire Hathaway Inc., Warren Buffett's conglomerate, and \$1,000 to \$15,000 in Peabody Energy Corp., the world's largest private-sector coal company.

They also had one big liability: a line of credit, ranging from \$5 million to \$25 million, with Morgan Stanley Bank.

Schiff listed more than 200 investments in various stocks and other investments, and he disclosed one liability, a margin loan with Pershing LLC, of between \$1 million to \$5 million. He also disclosed his salary-more than \$17 million in 2008.

McMahon has already poured more than \$15 million of her own money into her Senate campaign, and she has said she may spend up to \$50 million. Her self-funded campaign allows her to claim independence from big donors, and she has said that if she's elected, she'll pass on the Senate salary, which currently is \$174,000 a year. Blumenthal's campaign has said he would draw that government paycheck.

But the prominence of McMahon's money could also be an albatross at a time when many Americans have lost their jobs, their homes, and their economic stability.

"I think people have a high tolerance, if not admiration and respect, for the very wealthy," because it's part of the American dream, said Sheila Krumholz, executive director of CRP, a nonpartisan group that tracks money in politics. "But the issue remains, can they relate to their constituents? Can they relate to their needs, particularly in an economic downturn?"

In surveys posing that question, voters have given Blumenthal higher marks than McMahon. In the Quinnipiac University poll released on June 10, 66 percent of those surveyed said "yes" when asked if Blumenthal "cares about the needs and problems of people like you." When asked that question about McMahon, 48 percent of respondents said yes. The poll did not ask that question of Schiff.

"I don't think people think of him [Blumenthal] as being wealthy," said Poll Director Douglas Schwartz. "Yes, he is from Greenwich, but that's not what he is known for. Whenever there's a story about her, one of the most prominent features is her wealth."

Election 2010 Washington

Source URL: <http://ctmirror.org/story/6515/blumenthalcmcmahonfinances>

Exhibit 4

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

SECRETARY OF THE SENATE

10 OCT 20 AM 11:26
Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Blumenthal for Senate

ADDRESS (number and street)

Blumenthal for Senate

Check if different than previously reported. (ACC)

777 Summer Street

Stamford

CT

06901

2. FEC IDENTIFICATION NUMBER

C00473587

CITY

STATE

ZIP CODE

STATE DISTRICT

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

CT

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

In the State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the State of

5. Covering Period

07

01

2010

through

09

30

2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Ellen Camhi

Signature of Treasurer

E. Camhi

Date

10

15

2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3
(Revised 03/2003)

SUMMARY PAGE

FEC Form 3 (Revised 02/2003)

of Receipts and Disbursements

2 / 843

Write or Type Committee Name

Blumenthal for Senate

Report Covering the Period:

From:

N	M	D	D	Y	Y	Y	Y
0	7	0	1	2	0	1	0

To:

N	M	D	D	Y	Y	Y	Y
0	9	3	0	2	0	1	0

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(a)).....	1395582.74	4879385.55
(b) Total Contribution Refunds (from Line 20(d)).....	23397.00	42247.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)).....	1372185.74	4837138.55
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).....	3071298.20	4422656.37
(b) Total Offsets to Operating Expenditures (from Line 14).....	0.00	1497.36
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)).....	3071298.20	4421159.01
8. Cash on Hand at Close of Reporting Period (from Line 27).....	1159219.94	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D).....	500000.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE

of Receipts

FEC Form 3 (Revised 12/2003)

3 / 843

Write or Type Committee Name
Blumenthal for Senate

Report Covering the Period:

From:

MM DD YYYY
07 01 2010

To:

MM DD YYYY
09 30 2010

L RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	897726.88	3716355.90
(ii) Unitemized.....	240322.16	408828.95
(iii) TOTAL of contributions from Individuals..... ▶	1138049.04	4126191.85
(b) Political Party Committees.....	0.00	825.00
(c) Other Political Committees (such as PACS).....	250112.42	733015.74
(d) The Candidate.....	7421.28	19352.96
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))	1395582.74	4879385.55
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.....	230796.03	240747.16
13. LOANS		
(a) Made or Guaranteed by the Candidate.....	500000.00	500000.00
(b) All Other Loans.....	0.00	0.00
(c) TOTAL LOANS (add Lines 13(a) and (b)).....	500000.00	500000.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.).....	0.00	1497.36
15. OTHER RECEIPTS (Dividends, Interest, etc.).....	2134.87	2493.24
16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)..... ▶	2128513.64	5624123.31

10020880003

DETAILED SUMMARY PAGE
of Disbursements

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....	3071298.20	4422656.37
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.....	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	0.00	0.00
(b) Of all Other Loans.....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	21647.00	40497.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	1750.00	1750.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	23397.00	42247.00
21. OTHER DISBURSEMENTS.....	0.00	0.00
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ▾	3094695.20	4464903.37

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	2125401.50
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page3).....	2128513.64
25. SUBTOTAL (add Line 23 and Line 24).....	4253915.14
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	3094695.20
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	1159219.94

SCHEDULE C (FEC Form 3)

Use separate schedule(s)
for each category of the
Detailed Summary Page

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LOANS

FOR LINE NUMBER:
(check only one) 13a
 13b

NAME OF COMMITTEE (in Full)
Blumenthal for Senate

Transaction ID: L35B

LOAN SOURCE Full Name (Last, First, Middle Initial)
Hon. Richard Blumenthal, PERS FUNDS - (PERSON-
AL FUNDS)

Election:
 Primary
 General
 Other (specify) ▼

Mailing Address 145 Clapboard Ridge Road

City Greenwich State CT ZIP Code 06831

Original Amount of Loan 500000.00
Cumulative Payment To Date 0.00
Balance Outstanding at Close of This Period 500000.00

TERMS

Date Incurred 09 30 2010 Date Due 09/30/2012 Interest Rate .0000 % (apr) Secured: Yes No

List All Endorsers or Guarantors (if any) to Loan Source

Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []

SUBTOTALS This Period This Page (optional) ▶ 500000.00

TOTALS This Period (last page in this line only) ▶ 500000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

10020080843

Exhibit 5

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

SECRETARY OF THE SENATE

10 OCT 21 PM 3:44

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Blumenthal for Senate

ADDRESS (number and street) Blumenthal for Senate

777 Summer Street

Check if different than previously reported. (ACC)

Stamford CT 06901

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE STATE DISTRICT

C00473587

3. IS THIS REPORT NEW (N) OR AMENDED (A)

CT 00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

- Primary (12P) General (12G) Runoff (12R)
- Convention (12C) Special (12S)

Election on 11 02 2010 in the State of CT

(c) 30-Day POST-Election Report for the:

- General (30G) Runoff (30R) Special (30S)

Election on in the State of

5. Covering Period 10 01 2010 through 10 13 2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Ellen Camhi

Signature of Treasurer *Ellen Camhi* Date 10 21 2010

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only									
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FEC FORM 3
(Revised 02/2003)

Image# 1.000000

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

2 / 139

Write or Type Committee Name

Blumenthal for Senate

Report Covering the Period:

From:

M M
1 0

D D
0 1

Y Y Y Y
2 0 1 0

To:

M M
1 0

D D
1 3

Y Y Y Y
2 0 1 0

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)).....	226652.12	5106037.67
(b) Total Contribution Refunds (from Line 20(d)).....	1693.50	43940.50
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)).....	224958.62	5062097.17
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).....	1765568.80	6188225.17
(b) Total Offsets to Operating Expenditures (from Line 14).....	0.00	1497.36
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)).....	1765568.80	6186727.81
8. Cash on Hand at Close of Reporting Period (from Line 27).....	1368821.61	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	2250000.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

FE5AN018

10020924669

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3 (Revised 12/2003)

Write or Type Committee Name
Blumenthal for Senate

Report Covering the Period: From:

M	M
1	0

D	D
0	1

Y	Y	Y	Y
2	0	1	0

 To:

M	M
1	0

D	D
1	3

Y	Y	Y	Y
2	0	1	0

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	165185.00	3881550.90
(i) Itemized (use Schedule A).....	36261.76	446090.71
(ii) Unitemized.....	201446.76	4327638.61
(iii) TOTAL of contributions from individuals..... ▶	0.00	825.00
(b) Political Party Committees.....	24950.00	757965.74
(c) Other Political Committees (such as PACS).....	255.36	19608.32
(d) The Candidate.....	226652.12	5106037.67
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))	0.00	240747.16
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.....	0.00	0.00
13. LOANS		
(a) Made or Guaranteed by the Candidate.....	1750000.00	2250000.00
(b) All Other Loans.....	0.00	0.00
(c) TOTAL LOANS (add Lines 13(a) and (b)).....	1750000.00	2250000.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.).....	0.00	1497.36
15. OTHER RECEIPTS (Dividends, Interest, etc.).....	211.85	2705.09
16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)..... ▶	1976863.97	7600987.28

10020924630

DETAILED SUMMARY PAGE
of Disbursements

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....	1765568.80	6188225.17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.....	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	0.00	0.00
(b) Of all Other Loans.....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	1693.50	42190.50
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	1750.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	1693.50	43940.50
21. OTHER DISBURSEMENTS.....	0.00	0.00
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ▶	1767262.30	6232165.67

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	1159219.94
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page3).....	1976863.97
25. SUBTOTAL (add Line 23 and Line 24).....	3136083.91
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	1767262.30
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	1368821.61

SCHEDULE C (FEC Form 3)

LOANS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one) 13a 13b

NAME OF COMMITTEE (In Full)
Blumenthal for Senate

Transaction ID: L358

LOAN SOURCE Full Name (Last, First, Middle Initial)
Hon. Richard Blumenthal, PERS FUNDS - [PERSONAL FUNDS]

Election:
 Primary
 General
 Other (specify) ▼

Mailing Address 145 Clapboard Ridge Road

City Greenwich State CT ZIP Code 06831

Original Amount of Loan 500000.00	Cumulative Payment To Date 0.00	Balance Outstanding at Close of This Period 500000.00
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TERMS

Date Incurred: MM/DD/YYYY 09/30/2012 Date Due: 09/30/2012 Interest Rate: .0000 % (apr) Secured: Yes No

List All Endorsers or Guarantors (if any) to Loan Source

Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding:
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding:
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding:
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding:

SUBTOTALS This Period This Page (optional) 500000.00
TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

10020924025

SCHEDULE C (FEC Form 3)

LOANS

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER: (check only one) 13a 13b

NAME OF COMMITTEE (In Full)
Blumenthal for Senate

Transaction ID: L363

LOAN SOURCE Full Name (Last, First, Middle Initial)
Hon. Richard Blumenthal, PERS FUNDS - [PERSONAL FUNDS]

Election:
 Primary
 General
 Other (specify) ▼

Mailing Address 145 Clapboard Ridge Road

City Greenwich State CT ZIP Code 06831

Original Amount of Loan 1750000.00	Cumulative Payment To Date 0.00	Balance Outstanding at Close of This Period 1750000.00
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TERMS

Date Incurred MM DD 10 07 YY V V V V 20 10	Date Due 10/07/2012	Interest Rate .0000 % (apr)	Secured: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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List All Endorsers or Guarantors (if any) to Loan Source

Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []
Full Name (Last, First, Middle Initial)	Name of Employer
Mailing Address	Occupation
City State ZIP Code	Amount Guaranteed Outstanding: []

SUBTOTALS This Period This Page (optional)	1750000.00
TOTALS This Period (last page in this line only)	2250000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

10020324826