# Kenneth James Krayeske

*· Hartford, CT 06105*

June 21, 2012

Attorney Ruth Heilizer
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

**MUR #** *6604*

Dear Attorney Heilizer:

The purpose of this letter is to report possible violations of Federal Election law under the Commission's jurisdiction. I received your letter of May 21, 2012, and have corrected the jurat as instructed. The undersigned is an attorney, former candidate for Congress in Connecticut's First Congressional District, and former co-chair of the Green Party of Connecticut. I write as a concerned citizen, and a listener of WTIC-1080 AM.

This complaint is against the Lisa Wilson-Foley for Congress Campaign Committee, John Rowland, and CBS Radio, Inc. Lisa Wilson-Foley is a Republican candidate for Congress in Connecticut's Fifth Congressional District. John Rowland is a former Congressman who was convicted of political corruption during his time as governor of the state of Connecticut. Mr. Rowland currently hosts the afternoon drive time talk show (3 pm to 6 pm) on WTIC-1080 AM radio, based out of Farmington, CT. CBS Radio Stations, Inc. is a Delaware corporation and the licensee and owner of the WTIC-1080 AM radio station.

This complaint is based on the following:

4. Additional media reports show that Mr. Rowland seems to have used his position as a radio talk show host in order to perform paid political services for the Wilson-Foley campaign.

5. On April 27, 2012 article in the Hartford Courant, columnist Colin McEnroe reported that on one instance, Mr. Rowland interviewed Andrew Roraback, a Republican state senator who is also running for the Congressional seat in Connecticut's fifth congressional district against Wilson-Foley.

The article stated:

On one occasion, he invited Roraback on as a guest and then berated him. When you book a radio guest, you usually get his cellphone number. Rowland in ensuing weeks took to flogging Roraback for his stance on the death penalty and then — wait for it — gave out Roraback's cellphone number on the air so that especially angry people could call him.

6. John Rowland is paid by CBS Radio, Inc. to be an on-air radio personality for his radio show, which features advertising. John Rowland is an agent of CBS Radio, Inc.

7. CBS Radio, Inc. sells these advertising spots on shows to finance operations for WTIC-1080 AM.

8. Under the principal-agent theory of liability, CBS Radio, Inc. as principal is liable for the acts of its agent, John Rowland, and is bound by the decisions of its agent.

9. It appears that the Wilson-Foley campaign and John Rowland coordinated a political attack against at least one of her opponents, Andrew Roraback, using live air-time on CBS Radio, Inc.'s WTIC-1080 AM's frequency.

10. This live air-time is a commodity that should have been paid for by the Wilson-Foley campaign or be listed as a contribution to the Wilson-Foley campaign.

11. In its FEC filings to date, Lisa Wilson-Foley has not listed CBS Radio, Inc. as a paid vendor or in-kind contributor to the congressional campaign.

12. On April 26, 2012, CBS Radio, Inc. was quoted by the Register Citizen newspaper that Mr. Rowland will remain on the air.

Based upon this information, the Wilson-Foley campaign appears to have violated federal law for its acceptance of valuable air-time as a contribution that benefitted the campaign and for failing to report this contribution of air-time by CBS Radio, Inc. and its agent John Rowland since it appears to have benefitted her campaign.

Also, any in-kind contributions of air-time by CBS Radio, Inc. and its employee John Rowland to the Wilson-Foley campaign for campaign related activities would be in violation of 11 CFR 114.2.

Please do not hesitate to contact me if you have any further questions. The foregoing facts are true to the best of my knowledge.

Very Truly Yours,

Kenneth James Krayeske, Esq.

STATE OF CONNECTICUT )
                            ) ss: Meriden
COUNTY OF NEW HAVEN )

       Personally appeared Ken Krayeske, signer and sealer of the foregoing instrument and acknowledged the same to be his free act and deed, subscribed and sworn to before me this 21st day of June 2012.


Notary Public
My commission expires: 3/31/17