



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 1, 2018

JOHN S. RUTKAUSKAS, TREASURER  
AMERICAN ACADEMY OF PEDIATRIC  
DENTISTRY POLITICAL ACTION  
COMMITTEE  
211 E CHICAGO AVE  
SUITE 1600  
CHICAGO, IL 60611

**Response Due Date**  
**03/08/2018**

IDENTIFICATION NUMBER: C00365965

REFERENCE: YEAR-END REPORT (07/01/2017 - 12/31/2017)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule B of your report discloses an in-kind contribution designated for the general election, but made before the primary election (see attached). In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers. Please amend your report to include a description of the nature of the in-kind contribution in question. If the in-kind contribution on your report does not have a "long-term useful life", it may constitute an excessive contribution for the primary election (see Advisory Opinion 1996-29).

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must request a refund or provide

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a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee. In addition, any refunds should be reported on Schedule A supporting Line 16 of the Detailed Summary Page of the report covering the period in which they are received. Redesignations should be reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. (11 CFR §110.2(b))

Although the Commission may take further legal steps, prompt action by your committee to refund or seek redesignation of the excessive amount will be considered.

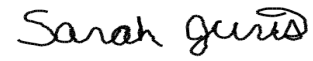
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

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Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive, slightly slanted style.

Sarah Juris  
Senior Campaign Finance Analyst  
Reports Analysis Division

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**Impermissible, Excessive, and Prohibited Contributions****American Academy of Pediatric Dentistry Political Action Committee (C00365965)****In-Kind Contribution Designated for General Election Made Before Primary**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Primary Date</b>	<b>Report</b>
*American Academy of Pediatric Dentistry	12/1/17	\$5,000.00	G2018	5/22/18	2017 Year-End

\*In-kind contribution: Reception for Cong. Drew Ferguson 3/6/17