



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-3

May 22, 2003

Adam M. Roberts, Treasurer
Humane USA Political Action Committee
P.O. Box 19224
Washington, DC 20036

Identification Number: C00350439

Reference: Amended July Quarterly Report (4/1/02-6/30/02), received 10/9/02 and
October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Roberts:

This letter is to inform you that as of May 21, 2003 the Commission has not received your response to our requests for additional information dated April 30, 2003. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by June 11, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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. If you should have any questions regarding this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Adam M. Roberts, Treasurer
Humane USA Political Action Committee
P.O. Box 19224
Washington, DC 20036

APR 30 2003

Identification Number: C00350439

Reference: October Quarterly Report (7/1/02-9/30/02)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2002 primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

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

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

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent

HUMANEUSA POLITICAL ACTION COMMITTEE-PAGE 2

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

HUMANEUSA POLITICAL ACTION COMMITTEE-PAGE 3

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

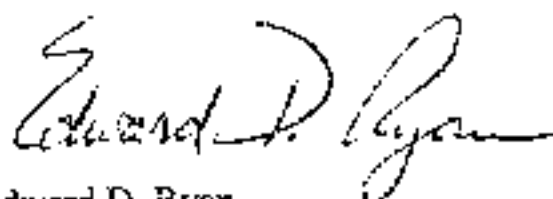
-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): consultant fee, expenses, and expenses reimbursement. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, an indication of whether the candidate was supported or opposed, the signature of the treasurer, and a notarized certification of the information provided. Please amend Schedule E by providing the name and mailing address of the payee and the name and office sought, state and district (if applicable) of the federal candidate. 11 CFR §104.3(b)(3)(vii)

HUMANEUSA POLITICAL ACTION COMMITTEE-PAGE 4

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Edward D. Ryan
Campaign Finance Analyst
Reports Analysis Division

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2025 RELEASE UNDER E.O. 14176

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)								PAGE 23/35
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b

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)
HUMANEUSA POLITICAL ACTION COMMITTEE

A. TIM JOHNSON

Full Name (Last, First, Middle Initial) Date of Disbursement
07 / 30 / 2002

Mailing Address
PO BOX 1859

City **SIoux FALLS** State **SD** Zip Code **57101** Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement

Candidate Name Category/Type

Office Sought: House Senate President
State: SD District: 03

Disbursement For: 2002 *Primary*
 Primary General Other (specify) *DATE 6/04/02*

Transaction ID: **SB23.6089** *EDD*

B. LOBIONDO FOR CONGRESS

Full Name (Last, First, Middle Initial) Date of Disbursement
07 / 09 / 2002

Mailing Address
PO BOX 775

City **MARMORA** State **NJ** Zip Code **08223** Amount of Each Disbursement this Period
500.00

Purpose of Disbursement

Candidate Name Category/Type

Office Sought: House Senate President
State: NJ District: 03

Disbursement For: 2002 *Primary*
 Primary General Other (specify) *DATE 6/04/02*

Transaction ID: **SB23.6072** *EDD*

C. RUSH HOLT FOR CONGRESS INC

Full Name (Last, First, Middle Initial) Date of Disbursement
07 / 09 / 2002

Mailing Address
P.O. Box 782

City **Pennington** State **NJ** Zip Code **08534** Amount of Each Disbursement this Period
1000.00

Purpose of Disbursement

Candidate Name Category/Type

Office Sought: House Senate President
State: NJ District: 12

Disbursement For: 2002 *Primary*
 Primary General Other (specify) *DATE 6/04/02*

Transaction ID: **SB23.6056** *EDD*

SUBTOTAL of Disbursements This Page (optional) **2500.00**

TOTAL This Period (last page this line number only) **2500.00**

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER: (check only one)

PAGE 24 / 36

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				<input type="checkbox"/> 29

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NAME OF COMMITTEE (in Full)
HUMANEUSA POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)
A. TANCREDO FOR CONGRESS COMMITTEE INC

Date of Disbursement
07 / 18 / 2002

Mailing Address
PO Box 3756 PO Box 3756

City State Zip Code
Littleton CO 80161

Purpose of Disbursement
Amount of Each Disbursement this Period
1000.00

Candidate Name
Category Type

Office Sought: House Senate President
Disbursement For: 2002
 Primary General Other (specify) _____

State: CO District: 06
Transaction ID: SB23.6080

Full Name (Last, First, Middle Initial)
B. Robert Torricelli

Date of Disbursement
07 / 18 / 2002

Mailing Address
1300 CONNECTICUT AVE NW SUITE 600

City State Zip Code
Washington DC 20036

Purpose of Disbursement
Amount of Each Disbursement this Period
1000.00

Candidate Name
Category Type

Office Sought: House Senate President
Disbursement For: 2002 *2002-2004*
 Primary General Other (specify) _____ *2002*

State: NJ District: *del/wh*
Transaction ID: SB23.6079

Full Name (Last, First, Middle Initial)
C. LPTON FOR ALL OF US

Date of Disbursement
07 / 14 / 2002

Mailing Address
PO BOX 490

City State Zip Code
ST JOSEPH MI 49085

Purpose of Disbursement
Amount of Each Disbursement this Period
100.00

Candidate Name
Category Type

Office Sought: House Senate President
Disbursement For: 2002
 Primary General Other (specify) _____

State: MI District: 05
Transaction ID: SB23.6083

SUBTOTAL of Disbursements This Page (optional) **2100.00**

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:
(check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 28	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				<input type="checkbox"/> 29

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NAME OF COMMITTEE (in Full)
HUMANUSA POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial) A. WHITFIELD FOR CONGRESS COMMITTEE		Date of Disbursement 07 / 09 / 2002
Mailing Address P.O. BOX 391		Amount of Each Disbursement this Period 500.00
City HOPKINSVILLE	State KY	
Purpose of Disbursement		
Candidate Name		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 <input checked="" type="checkbox"/> Primary General Other (specify) ▼	Transaction ID: SB23 6070
State: KY	District: 01	

Full Name (Last, First, Middle Initial) B. WHITFIELD FOR CONGRESS COMMITTEE		Date of Disbursement 08 / 15 / 2002
Mailing Address P.O. BOX 391		Amount of Each Disbursement this Period 500.00
City HOPKINSVILLE	State KY	
Purpose of Disbursement		
Candidate Name		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) ▼	Transaction ID: SB23.6126
State: KY	District: 01	

C.

SUBTOTAL of Disbursements This Page (optional)	1000.00
TOTAL This Period (last page this line number only)	5600.00

22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100