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REPORTS ANALYSIS  
DIVISION

2008 SEP 18 P 2: 16

September 11, 2008

Mr. Corbin T. Jones  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission

Identification Number: C00024281

Reference: Response to Amended July Quarterly Report

Dear Corbin,

This letter is in response to the Commission's preliminary review of the American Meat Institute's Amended Quarterly Report for July, 2008. Included in this letter are the following:

- Information on adjustments requested by the Commission pertaining to differences noted for the beginning and ending cash balances.
- Information and adjustments made to the summary and detailed summary pages of the July Quarterly Report and preceding reports as necessary.
- Relevant documentation in support of refunds and redesignations made from candidate disbursements during the period of April - June, 30, 2008.

Due to the initial request for additional information from the Commission, AMI's decision to go forth with an internal audit resulted in the amending of previously filed FEC reports, ranging from January 1<sup>st</sup>, 2007 - Present. Enclosed, you will find hard copies of the amended reports for the periods mentioned above as well as the same amendments filed electronically using FECFile.

The cash on hand for the end of the 1<sup>st</sup> Quarter 2008 filing has been corrected to reflect the matching beginning balance for the 2<sup>nd</sup> Quarter 2008 filing. On page 2 of the Q2, 2008 Report, the correct cash on hand for the beginning of the reporting period is **\$60,335.74**.

The totals listed on lines 6(c), 11(a)(ii), 11(a)(iii), 11(d), 17, 19 and 20 of Columns A and B of the Summary and Detailed Summary pages (for Q2, 2008) have been corrected to reflect the correct totals for the July period:

- For line 6(c), Column B should total **\$89,935.25** as a result of adding 6(c) Column A of Q1, 2008 to 6(c) Column A of Q2, 2008.
- For lines 11(a)(ii) and 11(a)(iii), Column A (Q2, 2008) shows itemized receipts totaling \$22,900.00 and unitemized receipts totaling \$8,045.00 resulting in a sum of **\$30,945.00**

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for line 11(a)(iii) Column A, Q2, 2008. Line 11(d) Column A for Q1, 2008 is \$46,480.00 and line 11(d) Column A for Q2, 2008 is \$40,945.00 resulting in a total of **\$87,425.00** for line 11(d) Column B for Q2, 2008.

- Line 11(d) Column A shows the total contributions as being **\$40,945.00** for the Q2, 2008 report, which includes two \$5,000.00 PAC to PAC contributions located on line 11c. Line 11(d) Column B (for Q2, 2008) should total **\$87,425.00** to reflect the total from line 11(d) Column A, Q1, 2008 (**\$46,480.00**) and 11(d) Column A from the Q2, 2008 report.

- For line 17 Column A, the interest that was earned for Q2, 2008 came to **\$2.80**. For line 17 Column A, interest earned for Q1, 2008 was **\$7.45** resulting in a total of **\$10.25** for line 17 Column B, Q2, 2008.

- Line 19 Column A shows a total of **\$43,447.80** which includes \$2,500.00 (located on line 16) in refunds of contributions made to federal candidates. The totals from line 19, Column A for both quarters of 2008 equals a combined total of **\$89,935.25** for Column B, Q2, 2008.

- Line 18(c) was \$0.00 in Q1 and \$0.00 for Q2, 2008. As a result, the total for line 20 Column A Q2, 2008 is **\$43,447.80** and the total for Column B Q2, 2008, **\$89,935.25**.

Please refer to the attached refund/redesignation timeline packet which outlines in greater detail the amendments that were made to schedule B of the Q2, 2008 report. As mentioned in the Commission's original letter, schedule B of the Q2, 2008 report discloses information on disbursements made to Senators Norm Coleman, Elizabeth Dole and Mitch McConnell:

- The most recent contribution made to the Elizabeth Dole Committee, Inc. was for \$5,000.00 on 6/23/2008. This placed AMI-PAC over the maximum amount by \$3,500.00. On 7/7/2008, a first check was refunded by the Elizabeth Dole Committee, Inc. for \$2,500.00. On 8/26/2008, a second refund check was written by the Elizabeth Dole Committee, Inc. for \$1000.00 giving us a total return of \$3,500.00. These refunds took place immediately after the Q2 Report, and will be included in the Q3 - 2008 report. Photocopies of the declared refund checks are included.

- The most recent check disbursed to the 2008 Senators Classic Committee for Mitch McConnell was written on 6/4/2008 for \$1,000.00 to the General election. This amount was refunded from the 2008 Senators Classic Committee on 6/30/2008 for \$1,000.00 and has been declared on line 16 of the Q2, 2008 report. A Photocopy of the refunded check has been provided.

- On 6/12/2008, a check was written to Coleman for Senate '08 for \$2,000.00 to the General election which placed AMI-PAC over the maximum amount by \$2,000.00. With prior authorization from the Coleman for Senate committee, the amount of \$2,000.00 was redesignated during the Q2 period to the Primary election. A photocopy of the redesignation letter was sent to AMI-PAC on 7/21/2008, and has been included with this letter, and declared on line 23 of the Q2, 2008 report.

Due to a decision to move forward with an internal audit of the AMI-PAC, amendments were made to previous reports, including the first half of January 2007 to the latest Q2, 2008 report. These amendments were deemed necessary to accurately reflect the correct totals for the beginning and ending cash on hand, which includes both reports in 2007 as well as both

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quarterly reports for 2008. Amendments were made to all reports mentioned above due to incompatibility issues relating to the FECFile software and our computers used to complete the filing electronically. The amendments developed from the audit accurately reflect the activities and balances of the PAC. Corrections have been made to procedures to prevent this outcome in prospective filings. Additionally, we are evaluating third party software to improve compatibility with FECfile and provide the highest assurance of accuracy.

Thank you for bringing this matter to our attention and your counsel. Should you have any additional questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Brown', written over a horizontal line.

Michael Brown  
Senior Vice President, Legislative Affairs

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**Time Table for Campaign Refunds/Resignations Mentioned in FEC Letter**

Name	Amount	Election	Payable To:	Date	Notes
Elizabeth Dole	1,000.00	General	Elizabeth Dole Committee, Inc.	12/5/2007	
Elizabeth Dole	2,500.00	General	Elizabeth Dole Committee, Inc.	1/30/2008	
Elizabeth Dole	5,000.00	General	Elizabeth Dole Committee, Inc.	6/23/2008	
Elizabeth Dole	-2,500.00	General	Elizabeth Dole Committee, Inc.	7/7/2008	Check Refunded
Elizabeth Dole	-1,000.00	General	Elizabeth Dole Committee, Inc.	8/26/2008	Check Refunded

**Total:** 5,000.00

Name	Amount	Election	Payable To:	Date	Notes
Mitch McConnell	2,500.00	General	McConnell for Senate Committee '08	9/25/2006	
Mitch McConnell	2,500.00	General	McConnell for Senate Committee '08	5/15/2007	
Mitch McConnell	2,000.00	Primary	McConnell for Senate Committee '08	3/4/2008	
Mitch McConnell	3,000.00	Primary	McConnell for Senate Committee '08	3/26/2008	
Mitch McConnell	1,000.00	General	McConnell for Senate Committee '08	6/4/2008	
Mitch McConnell	-1,000.00	General	McConnell for Senate Committee '08	6/30/2008	Check Refunded

**General:** 5,000.00

**Primary:** 5,000.00

Name	Amount	Election	Payable To:	Date	Notes
Norm Coleman	1,000.00	General	Coleman for Senate 08	2/28/2007	
Norm Coleman	2,000.00	General	Coleman for Senate 08	4/26/2007	
Norm Coleman	1,000.00	General	Coleman for Senate 08	9/4/2007	
Norm Coleman	1,000.00	General	Coleman for Senate 08	5/22/2008	
Norm Coleman	2,000.00	General	Coleman for Senate 08	6/12/2008	Redesignated 6/30/08
Norm Coleman	2,000.00	Primary (Redesignated)	Coleman for Senate 08	6/30/2008	

**General:** 5,000.00

**Primary:** 2,000.00

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**ELIZABETH DOLE COMMITTEE, INC.**  
Post Office Box 2918 Raleigh, North Carolina 27602

FIRST-CITIZENS BANK & TRUST CO.  
RALEIGH, NC  
66-30/531

2553

7/7/2008

PAY TO THE ORDER OF American Meat Inst. PAC \$\*\*2,500.00

Two Thousand Five Hundred and 00/100\*\*\*\*\* DOLLARS 

American Meat Inst. PAC

150 Connecticut Avenue, NW, FL 12  
Washington, DC 20036

MEMO

GENERAL LEGAL LIMIT MET

VOID AFTER 90 DAYS

*Kully E. Holway*

ELIZABETH DOLE COMMITTEE, INC.

American Meat Inst. PAC  
MISC EXPENSES:Contribution Refunds

7/7/2008

2553  
2,500.00

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**ELIZABETH DOLE COMMITTEE, INC.**

Post Office Box 2918 Raleigh, North Carolina 27602

FIRST-CITIZENS BANK & TRUST CO.  
RALEIGH, NC  
66-30/531

2757

8/26/2008

PAY TO THE ORDER OF American Meat Institute PAC \$ \*\*1,000.00

One Thousand and 00/100\*\*\*\*\*DOLLARS

American Meat Institute PAC

1150 Connecticut Avenue, NW 12th Floor  
Washington, DC 20036

VOID AFTER 90 DAYS



MEMO Refund

ELIZABETH DOLE COMMITTEE, INC.

American Meat Institute PAC  
MISC EXPENSES:Contribution Refunds

2757

8/26/2008

1,000.00

First Citizens Bank Refund

1,000.00

# HUCKABY · DAVIS · LISKER

June 30, 2008

Mr. Phil Giles  
American Meat Institute PAC  
1150 Connecticut Avenue NW  
12<sup>th</sup> Floor  
Washington, DC 20036

Dear Phil:

Thank you for your telephone call. As discussed, enclosed is a refund from the 2008 Senators' Classic Committee for \$ 1,000, representing the amount of your donation that was allocated to the campaign of Senator Mitch McConnell.

Please do not hesitate to contact me at (703) 549-7705 if there are any questions.

Thank you.

Sincerely:



Keith A. Davis, Treasurer  
2008 Senators' Classic Committee

Encl.

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2008 SENATORS CLASSIC COMMITTEE 05/08  
228 S WASHINGTON ST STE 115  
ALEXANDRIA, VA 22314

1020

16-154/540

DATE 6/30/08

PAY  
TO THE  
ORDER OF

American Meat Institute PAC

\$ 1,000.00

One Thousand & 00/100

DOLLARS



BRANCH BANKING AND TRUST COMPANY  
1-800-BANK BBT BBT.com

OR contribution refund (McConnell)



MP

**Philip Giles**

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**From:** Keith Davis [kdavis@hdafec.com]  
**Sent:** Tuesday, July 01, 2008 11:25 AM  
**To:** Philip Giles  
**Subject:** Senators' Classic Refund

Thanks for your call, and attached is a list of the other participants in the joint committee.

If you could let me know the campaign to which you send a follow-up donation, that would be most helpful in our allocation formula. Thanks you – Keith Davis

This message was received from outside of the company.

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# NORM Coleman U.S. SENATE

680 Transfer Road, Suite A  
Saint Paul, Minnesota 55114

[www.colemanforsenate.com](http://www.colemanforsenate.com)

Phone: 651-645-0766  
Fax: 651-233-2405

July 21, 2008

Mr. Phil Giles  
American Meat Institute PAC  
1150 Connecticut Ave NW Ste 1200  
Washington, DC 20036-4126

RE: Redesignation/Reattribution /Refund Request

Dear Phil,

Thank you for your recent contribution to the Coleman for Senate Campaign! Your support is greatly appreciated.

We apologize for this inconvenience, but the amount you contributed though legal, put you over the \$5,000 limit allowed for the **GENERAL** election by \$2,000. We have redesignated this amount to the Coleman for Senate **PRIMARY** account. Federal election law requires that we advise you of this transfer. **If this is acceptable to you, you need do nothing more and can throw the second page away.**

If you would prefer to have the amount over \$5,000 refunded to you or reattributed to a spouse, please fill out the enclosed form and return it to us in the self-addressed envelope. Federal law requires that any refund or reattribution to a spouse be completed within 60 days. Please complete this form in a timely manner.

Thank you again for your generosity. If you have any questions please do not hesitate to call me at the campaign office, 651-233-2113.

Sincerely,

**Kathie Roberts**  
Coleman for U.S. Senate

Paid for by Coleman for Senate

Contributions to Coleman for Senate are not tax deductible for income tax purposes. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and employer of individuals whose contributions exceed \$200 in an election cycle. Contributions from foreign nationals are prohibited. Not printed at government expense.

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Federal Election Commission  
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<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
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*ER*

PREPARER  
(3/2005)

*9/18/08*

DATE PREPARED

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