



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Sara J. Lilygren, Treasurer  
American Meat Institute Political  
Action Committee  
1700 N Moore Street, Room 1600  
Arlington, VA 22209

NOV 8 2000

Identification Number: C00024281

Reference: July Quarterly Report (4/01/00-6/30/00)

Dear Ms. Lilygren:

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 discloses a contribution(s) towards the general election campaign of a Presidential candidate(s). Please note that contributions to Presidential candidates are governed by specific regulations. Please refer to the following explanation of Presidential election financing, and then amend your report to clarify this contribution(s).

All Presidential primary elections held during an election year are considered one election for the purpose of the contribution limits. A multi-candidate committee, therefore may give only \$5,000 to a Presidential candidate's primary campaign, regardless of how many separate state Presidential primaries the candidate participates in. 11 CFR §§110.1(j)(1) and 110.2(i)(1)

In the general election, contributions to Presidential campaigns are not permitted if the candidate receives public funds. (An exception: Political committees may contribute to a publicly funded Presidential nominee's "compliance fund." A compliance fund is used solely for legal and accounting expenses incurred in complying with the election law. Gifts to compliance funds are considered contributions and are subject to usual per-candidate, per-election limits.) 11 CFR §9003.3(a)

-The beginning cash balance of this report should equal the ending balance of your Amended April Quarterly Report (1/01/00-3/31/00) dated 9/07/00. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-The totals listed on Lines 7, 23, 28(c), 28(d), 30 and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Please provide a Schedule B to support the entry reported on Line 28(c) of the Detailed Summary Page. Each refund made to a political committee must be itemized on Schedule B regardless of the amount refunded. 2 U.S.C. §434(b)

-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.

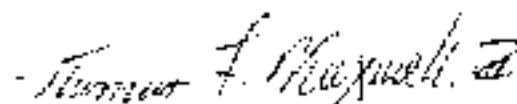
-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the dates of receipt and have incorrect dates of receipt. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Please amend Schedule B supporting Line 23 by providing the office sought including state and congressional district, if applicable and the correct date for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 of your report discloses a contribution to the American Dream PAC; however, you have disclosed "Henry Bonilla R-TX-23" in the purpose of disbursement field. Please clarify whether this was an earmarked contribution made by your committee through the American Dream PAC to this candidate, or if you made the contribution to the political committee exercising no direction or control over how the funds were to be used. If the latter is the case, please do not include the candidate's name in the purpose of disbursement field in future reports.

A written 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. 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,



Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

**SCHEDULE B ITEMIZED DISBURSEMENTS**

Use Separate Schedule(s)  
for each category of the  
Detailed Summary Page

PAGE 1 OF 3  
FOR LINE NUMBER  
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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)**  
**American Meat Institute PAC**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, Day, year)	Amount of Each Disbursement This Period
Ballenger for Congress PO Box 2852 Mickory, NC 28802	Case Ballenger R-NC-10 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):		\$800.00
B. Full Name, Mailing Address and ZIP Code Friends of John Boehner 8617 Liberty-Fairfield Rd. Hamilton, OH 46011	Purpose of Disbursement John Boehner R-OH-08 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$1,000.00
C. Full Name, Mailing Address and ZIP Code American Dream Pac 4461 Brookfield Corporate Drive Suite 200 Chantilly, VA 20151	Purpose of Disbursement Henry Bonilla R-TX-23 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$888.00
D. Full Name, Mailing Address and ZIP Code Bush For President 319 1/2 A Street, NE Washington, DC 20002	Purpose of Disbursement George Bush R- - Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$1,800.00
E. Full Name, Mailing Address and ZIP Code Gornbest Congressional Committee PO Box 10667 Lubbock, TX 79408	Purpose of Disbursement Larry Gornbest R-TX-19 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$1,000.00
F. Full Name, Mailing Address and ZIP Code Ehlers for Congress Committee PO Box 3340 Grand Rapids, MI 49601-3340	Purpose of Disbursement Vernon Ehlers R-MI-03 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$160.00
G. Full Name, Mailing Address and ZIP Code Ehrlich for Congress 8600 LaSalle Rd Suite 103 Baltimore, MD 21286	Purpose of Disbursement Robert Ehrlich R-MD-02 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$600.00
H. Full Name, Mailing Address and ZIP Code Ernie Fletcher for Congress P O Box 4703 Lexington, KY 40544	Purpose of Disbursement Ernest Lee Fletcher R-KY-08 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):		\$600.00
I. Full Name, Mailing Address and ZIP Code Goode for Congress 116 Orchard Avenue Rocky Mount, VA 24151	Purpose of Disbursement Virgil Goode D-VA-05 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other(specify):	01/01/1900	\$500.00

**SUBTOTAL** This Page (optional) .....

\$8,800.00

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

