

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:

- o Information on adjustments requested by the Commission pertaining to differences noted for the beginning and ending cash balances.
- o Information and adjustments made to the summary and detailed summary pages of the July Quarterly Report and preceding reports as necessary.
- o 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 1st, 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 1st Quarter 2008 filing has been corrected to reflect the matching beginning balance for the 2nd 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:

- o 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.
- o 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 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.
- o 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.
- o 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.

o 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.

o 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:

o 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.

o 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.

o 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 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,

Michael Brown
Senior Vice President, Legislative Affairs