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July 2, 2012

Ms. Rosa Lewis
Senior Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Committee ID: C00024281

Dear Ms. Lewis,

This letter is a follow-up to a discussion you had with Phil Giles, Manager, Legislative and Public Affairs, on May 4 and May 17, 2012 regarding the American Meat Institute Political Action Committee's (AMI-PAC) request for guidance in selecting the most appropriate filing method for entering cash adjustments to reports previously filed with the Federal Election Commission. The cash adjustments we discussed were identified as a result of an ongoing internal audit of AMI-PAC initiated by AMI.

During that discussion, you had recommended that the following adjustments be included on lines 17 and 21(b) of the upcoming July 15, 2012 quarterly report. Details of these adjustments have been included as memo text in the upcoming quarterly report to clarify the discrepancies in question, and to indicate the purpose and issue dates for the disbursements. Per your discussion, we have proceeded with the following adjustments:

- The amount of \$4,305.00 (written on 9/19/2008, check # 3272) to *Everybody Wins! DC* was withdrawn incorrectly from the AMI-PAC account to cover expenses for a lunch hosted by AMI for an event known as the *Ag Open*. As a solution, AMI provided AMI-PAC with a reimbursement check in February, 2009 for \$4,305.00. The disbursement has been included on line 21 (b). The contribution from February 2009 has been included on line 17 of the upcoming July 15, 2012 quarterly report to reflect the reimbursed payment from AMI to AMI-PAC. Per your recommendation, the entity has been classified as a vendor.
- While no specific amount was disclosed during our discussion, currently, AMI-PAC has not filed bank fees for the following years and amounts: 2008 (\$30.00), 2009 (\$71.00), 2010 (\$45.00). They have been included in the July 15, 2012 quarterly report.
- There was \$7.84 in bank interest that had not been reported in 2008. To correct this discrepancy, the amount of \$7.84 currently missing from line 17 (column A) of the January 31, 2008 quarterly report will be included on line 17 (column A) of the July 15, 2012 quarterly report to reflect the correct 2008 total of \$23.79.

Since AMI has concluded its internal audit of AMI-PAC, Mr. Giles contacted you on May 17 to notify you that in addition to the above identified discrepancies, we have been unable to reconcile a difference in our cash on hand amounts prior to 2008 which has left our AMI-PAC bank account cash on hand total higher than the total reported to the FEC by \$16,646.88. Believing this inconsistency was largely due to past voided campaign contributions not being reported, we attempted to identify the cause of this discrepancy. However, due to incomplete bank records prior to 2008 we have been unable to piece together the information necessary to rectify this issue.

Being unable to identify the source of this issue, we are following your advice by addressing the difference of \$16,646.88 on line 15 of the upcoming July 15, 2012 quarterly report.

We would be happy to discuss this issue in further detail at your convenience.

Regards,


Dale Nellor
Senior Vice President, Legislative Affairs

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Federal Election Commission
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