



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2421  
DATE FILMED 11/25/87 CAMERA NO. 3  
CAMERAMAN AS

87040564779

Public Record Index - MUR 2421

1. Memo, 10 Feb 87, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), subj: Referral of the American Dental Political Action Committee, w/atch (RAD Referral Package).
2. First General Counsel's Report, 18 May 87.
3. Certification of Commission Action, 22 May 87.
4. Ltr, 8 Jun 87, Scott E. Thomas (Chairman, FEC) to David Sampe (Treasurer, American Dental Political Action Committee).
5. Ltr, 18 Jun 87, Robert A. Carmines (Executive Director, ADPAC) to FEC, w/atch Statement of Designation of Counsel.
6. Ltr, 19 Jun 87, Carolyn Kay Weeder to FEC, subj: Request for pre-probable cause conciliation, w/atch (12 Day Pre-General Report).
7. General Counsel's Report, 14 Jul 87.
8. Memo, 17 Jul 87, Marjorie W. Emmons/Joshua McFadden to Lawrence M. Noble (Acting General Counsel), subj: Comments to MUR 2421 by Commissioner Thomas.
9. Certification of Commission Action, 17 Jul 87.
10. Ltr, 22 Jul 87, L.M. Noble to C.K. Weeder.
11. General Counsel's Report, 17 Sep 87.
12. Memo, 22 Sep 87, M.W. Emmons/J. McFadden to L.M. Noble, subj: Comments to MUR 2421.
13. Certification of Commission Action, 23 Sep 87.
14. Ltr, 25 Sep 87, L.M. Noble to C.K. Weeder, w/atch (executed conciliation agreement).

- End -

NOTE: In preparing its file for the public record, O.G.C. routinely removes those documents in which it perceives little or no public interest, and those documents, or portions thereof, which are exempt from disclosure under the Freedom of Information Act.

87040564780

Attachment 1



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 10, 1987

MEMORANDUM

**TO:** CHARLES N. STEELE  
GENERAL COUNSEL

**THROUGH:** JOHN C. SURINA  
STAFF DIRECTOR

**FROM:** JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

**SUBJECT:** NON-FILER REFERRALS OF MONTHLY UNAUTHORIZED COMMITTEES

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. In accordance with Standard 3 of the 1985-1986 RAD Review and Referral Procedures, further examination is required by your office.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986 (Attachment 35). Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986 (Attachment 36). The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

-  
-  
-  
-  
-  
-

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(2)

The attached printout lists the name, address and treasurer for each committee being referred. Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. Please note that the aggregate receipt and disbursement figures may be inflated in some cases because a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General Report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or b) 1987 February Monthly Reports have been filed.

If you have any questions, please contact Lisa Stolaruk at 376-2480.

Attachments

87040564782

(3)

C00000729

American Dental Political Action  
Committee

87NF-9

87040364783

17

87040564784

**AMERICAN DENTAL POLITICAL ACTION COMMITTEE**  
**(Attachments 2a - 2d)**

87 FEDERAL ELECTION COMMISSION 5  
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 4FEB87  
 PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN DENTAL POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: DENTAL ASS'N; AMERICAN				NON-PARTY QUALIFIED		ID #C00000729
1985	MISCELLANEOUS REPORT			31JAN85 TO FEC	1	85FEC/363/1806
	MID-YEAR REPORT	302,248	98,268	1JAN85 -30JUN85	58	85FEC/381/4125
	MID-YEAR REPORT - AMENDMENT	302,248	97,118	1JAN85 -30JUN85	4	85FEC/385/3267
	YEAR-END	63,116	29,900	1JUL85 -31DEC85	33	86FEC/399/0124
	YEAR-END - AMENDMENT	64,418	29,900	1JUL85 -31DEC85	5	86FEC/402/2554
	YEAR-END - AMENDMENT	63,747	29,900	1JUL85 -31DEC85	3	87FEC/455/1995
	REQUEST FOR ADDITIONAL INFORMATION			1JAN85 -31DEC85	1	86FEC/402/2703
1986	MISCELLANEOUS REPORT			7FEB86 FROM FEC	2	86FEC/402/1131
	STATEMENT OF ORGANIZATION - AMENDMENT			21FEB86	1	86FEC/403/2943
	STATEMENT OF ORGANIZATION - AMENDMENT			23APR86	1	86FEC/412/1635
	MISCELLANEOUS REPORT			12MAY86 FROM FEC	1	86FEC/413/4921
	FEBRUARY MONTHLY	75,360	5,000	1JAN86 -31JAN86	9	86FEC/403/2944
	FEBRUARY MONTHLY - AMENDMENT	75,467	5,000	1JAN86 -31JAN86	3	86FEC/408/4162
	FEBRUARY MONTHLY - AMENDMENT	75,550	5,000	1JAN86 -31JAN86	3	87FEC/488/1991
	MARCH MONTHLY	92,164	14,250	1FEB86 -28FEB86	18	86FEC/408/4146
	MARCH MONTHLY - AMENDMENT	-	-	1FEB86 -28FEB86	3	86FEC/443/6806
	MARCH MONTHLY - AMENDMENT	92,139	14,250	1FEB86 -28FEB86	3	87FEC/488/1987
	APRIL MONTHLY	86,571	48,832	1MAR86 -31MAR86	18	86FEC/412/1636
	APRIL MONTHLY - AMENDMENT	88,168	48,855	1MAR86 -31MAR86	5	87FEC/488/1981
	MAY MONTHLY	85,894	17,500	1APR86 -30APR86	14	86FEC/416/2751
	MAY MONTHLY - AMENDMENT	87,379	16,500	1APR86 -30APR86	8	87FEC/488/1978
	JUNE MONTHLY	73,454	77,850	1MAY86 -31MAY86	18	86FEC/417/8217
	JUNE MONTHLY - AMENDMENT	-	-	1MAY86 -31MAY86	6	86FEC/424/2290
	JUNE MONTHLY - AMENDMENT	73,454	78,108	1MAY86 -31MAY86	5	87FEC/488/1969
	REQUEST FOR ADDITIONAL INFORMATION			1MAY86 -31MAY86	5	86FEC/419/2823
	JULY MONTHLY	41,554	65,650	1JUN86 -30JUN86	12	86FEC/429/2146
	JULY MONTHLY - AMENDMENT	41,554	65,650	1JUN86 -30JUN86	4	86FEC/433/6440
	JULY MONTHLY - AMENDMENT	41,604	65,650	1JUN86 -30JUN86	3	87FEC/488/1965
	JULY MONTHLY - AMENDMENT	-	-	1JUN86 -30SEP86	2	86FEC/443/3897
	1 <sup>ST</sup> LETTER INFORMATIONAL NOTICE			1JUN86 -30JUN86	4	86FEC/436/1750
	AUGUST MONTHLY	33,702	103,800	1JUL86 -31JUL86	19	86FEC/428/1644
	AUGUST MONTHLY - AMENDMENT	33,702	103,800	1JUL86 -31JUL86	18	86FEC/431/0121
	AUGUST MONTHLY - AMENDMENT	33,702	101,524	1JUL86 -31JUL86	3	87FEC/455/1961
	REQUEST FOR ADDITIONAL INFORMATION			1JUL86 -31JUL86	1	86FEC/429/1196
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL86 -31JUL86	2	86FEC/431/0676
	SEPTEMBER MONTHLY	26,926	294,600	1AUG86 -31AUG86	21	86FEC/431/0099
	SEPTEMBER MONTHLY - AMENDMENT	26,926	294,600	1AUG86 -31AUG86	2	87FEC/455/1958
	OCTOBER MONTHLY	21,731	83,850	1SEP86 -30SEP86	13	86FEC/437/3590
	OCTOBER MONTHLY - AMENDMENT	-	-	1SEP86 -30SEP86	2	86FEC/443/3899
	OCTOBER MONTHLY - AMENDMENT	21,464	84,539	1SEP86 -30SEP86	4	87FEC/455/1953
	REQUEST FOR ADDITIONAL INFORMATION			1SEP86 -30SEP86	4	86FEC/443/1787
	PRE-GENERAL	289	37,750	1OCT86 -15OCT86	9	86FEC/444/2741
	PRE-GENERAL - AMENDMENT	289	37,750	1OCT86 -15OCT86	2	87FEC/455/1950
	NOTICE OF FAILURE TO FILE			1OCT86 -15OCT86	1	86FEC/444/1476

ATTACHMENT 2a

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
POST-GENERAL		6,604	644-	16OCT86 -24NOV86	11	86FEC/448/0404
POST-GENERAL	- AMENDMENT	6,604	644-	16OCT86 -24NOV86	2	87FEC/455/1947
	1'ST LETTER INFORMATIONAL NOTICE			16OCT86 -24NOV86	1	86FEC/451/3995
	YEAR-END	25,319	20,050	25NOV86 -31DEC86	8	87FEC/455/1938
	<b>TOTAL</b>	<b>938,593</b>	<b>0</b>	<b>892,400</b>	<b>0</b>	<b>366 TOTAL PAGES</b>

Ending cash-on-hand as of 12/31/86: \$172,151  
 Debts: \$0  
 All reports have been reviewed.

ATTACHMENT 2a

19

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**ANALYST:** Chris Nuland

**CONVERSATION WITH:** Robert Carmine, Executive Director

**COMMITTEE:** American Dental Political Action Committee

**DATE:** 11/17/86

**SUBJECT(S):** 12 Day Pre-General Report

I advised Mr. Carmine that the Commission had yet to receive his 12 Day Pre-General Report, which was due on October 23. He said that he would have a report delivered to me in person the next day.

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**ADPAC**

RECEIVED AT THE FEC

NOV 18 9 3: 39  
1972

American Dental  
Political Action Committee

ATTACHMENT 2c

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November 18, 1986

**HAND DELIVERED**

Mr. Christopher Muland  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

As per our conversation yesterday, please find enclosed our  
Committee's (I.D. #C00000729) 12-Day PreElection Report.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,

*RAC*

Robert A. Carnines  
Executive Director

Enclosure

87:944057641788



**SENSITIVE**

**FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, D.C. 20463**

**FIRST GENERAL COUNSEL'S REPORT**

**DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION \_\_\_\_\_**

**RAD REFERRALS 87NF-08 to 41  
STAFF MEMBER  
Deborah Curry**

**SOURCE OF HUR:            I N T E R N A L L Y   G E N E R A T E D**

**RESPONDENTS' NAMES:**

**American Dental Political Action Committee  
and Dr. David Sampe, as treasurer**

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RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(B) and  
11 C.F.R. 104.5(c)(3)(ii)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was generated by the Reports Analysis Division ("RAD") after a review of the disclosure reports of the above-named committees. The RAD referral reveals that the above mentioned committees and their treasurers, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

II. FACTUAL AND LEGAL ANALYSIS

Attached is a listing of thirty-four (34) monthly filers which failed to file a report covering the pre-election period by Election Day, November 4, 1986. (Attachment 1) On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Report by October 23, 1986. (Attachment 1, page 137) Each committee which failed to submit either a 12 Day Pre-General Report or a November Monthly Report was sent a Non-Filer Notice on November 14, 1986. (Attachment 1, page 139) The following six (6) committees were not sent Non-Filer Notices because a report covering the pre-election period was indexed by November 14, 1986:

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The attached printout lists the name, address and treasurer for each committee being referred. (Attachment 1, pages 5-10) Any telephone conversations are referenced under Contacts with Filers. The Summary Pages of the late-filed reports and/or letters of explanation are included under Reports Filed/Response(s).

In addition, a "C" index has been included for each committee. (Attachment 1) Please note that the aggregate receipt and disbursement figures may be inflated in some cases because (a) reports were submitted covering portions of the same period (e.g., a 12 Day Pre-General report covering October 1, 1986 through October 15, 1986 and a November Monthly Report covering October 1, 1986 through October 31, 1986), or (b) 1987 February Monthly Reports have been filed.

2 U.S.C. § 434(a)(4)(B) requires that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above

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referenced committees failed to file the 1986 Pre-General Election Report by the required deadline. Therefore, though the Commission is in receipt of report(s) disclosing financial activity covering the pre-general election period, such report(s) were not filed in a timely manner.

With regard to thirty-two non-filers listed below, the Office of General Counsel recommends that the Commission open MURs and find reason to believe these committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B).

8 7 0 4 0 4 6 4 7 9 5

III. RECOMMENDATIONS

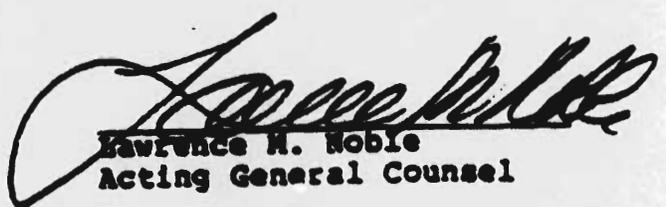
1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B):

American Dental Political Action Committee  
and Dr. David Sampe, as treasurer

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3. Approve the attached sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2.

Date 5/13/87

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Referral Materials
2. Sample Letter (1)
3. Sample Factual and Legal Analysis (1)

End 2

BEFORE

GENERAL ELECTION COMMISSION

In the Matter of

American Dental Political Action Committee  
and Dr. David Sampe, as treasurer

RAD Ref. 87NF-08 to 41

87040664795

(continued)

Federal Election Commission  
Certification for RAD Ref. 87NF-08 to 41  
May 21, 1987

Page 2.

87040564796



(continued)

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CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 87NF-08 to 41:

1. Open MURs with respect to those committees listed in Recommendation 2.
2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(B):

American Dental Political Action Committee  
and Dr. David Sampe, as treasurer

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Federal Election Commission  
Certification for RAD ReC. 87NF-08 to 41  
May 21, 1987

Page 4

87040564798

- 87040564799
3. Approve the sample letter and sample Factual and Legal Analysis to be sent to each committee listed in Recommendation 2, as recommended in the First General Counsel's Report signed May 18, 1987.
  - 4.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

5-22-87

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary: Tues., 5-19-87, 9:22  
Circulated on 48 hour tally basis: Tues., 5-19-87, 4:00  
Deadline for vote: Thurs., 5-21-87, 4:00

plm



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 8, 1987

Dr. David Sampe, Treasurer  
American Dental Political Action Committee  
1111 14th Street, N.W., 11th Floor  
Washington, D. C. 20005

RE: MUR 2421  
American Dental Political  
Action Committee and  
David Sampe, as treasurer

Dear Dr. Sampe:

On May 21, 1987, the Federal Election Commission determined there is reason to believe American Dental Political Action Committee and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

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recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas  
Chairman

Enclosures

- Factual and Legal Analysis
- Procedures
- Designation of Counsel Statement

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plan

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS: American Dental Political Action  
Committee and Dr. David Sampe,  
as treasurer**

**MUR 2421**

The RAD referral reveals that the above-mentioned committee and treasurer, may have violated 2 U.S.C. § 434(a)(4)(B) by failing to file the 1986 Pre-General Election Report in a timely manner.

On September 29, 1986, prior notification was sent to all unauthorized committees which specifically informed monthly filers of the requirement to file a 12 Day Pre-General Election Report by October 23, 1986. The above-mentioned Committee failed to file a report covering the pre-election period by Election Day, November 4, 1986. Each Committee which failed to submit either a 12 Day Pre-General Election Report or a November Monthly Report was sent a Non-filer Notice on November 14, 1986, unless the Commission had received the reports by that date.

2 U.S.C. § 434(a)(4)(B) required that monthly filers file a Pre-General Election Report, covering financial activity from October 1 through October 15, by October 23, 1986. The above-referenced committee failed to file the 1986 Pre-General Election Report by the required deadline. Though the Committee may have filed a report which disclosed financial activity covering the pre-general election period, such report was not filed in a

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timely manner. Therefore, the Office of General Counsel recommends the Commission open a MUR in this matter and find reason to believe the above-mentioned Respondents have violated 2 U.S.C. § 434(a)(4)(B).

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600# 3621

**American Dental  
Political Action Committee**

June 18, 1987

87 JUN 18 PM 12:58

RECEIVED  
JUN 18 1987

**HAND DELIVERED**

Mr. Charles Snyder  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 2421

Dear Mr. Snyder:

Please find enclosed our statement of designation of counsel with regard to MUR 2421.

Thank you for your attention to this matter.

Sincerely,



Robert A. Carmines  
Executive Director

Enclosure  
Designation of Counsel Statement

cc: Carolyn K. Weeder

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2421

NAME OF COUNSEL: Carolyn K. Weeder

ADDRESS: McDermott, Will & Emery

1850 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202) 887-8000

The above-named individual is hereby designated as my  
counsel and is authorized to receive any notifications and other  
communications from the Commission and to act on my behalf before  
the Commission.

JUNE 17, 1987  
Date

Robert A. Carmines  
Signature

RESPONDENT'S NAME: Robert A. Carmines

ADDRESS: American Dental PAC

1111 14th Street, N.W.

Washington, D.C. 20005

HOME PHONE: (202) 483-0703

BUSINESS PHONE: (202) 898-2424

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GCH 3630

**McDERMOTT, WILL & EMERY**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1850 K STREET, N. W.

WASHINGTON, D. C. 20006

202/887-8000

FACSIMILE 202/778-8087

TELEX 904261 MILAM WASH

111 WEST MONROE STREET  
CHICAGO, ILLINOIS 60603  
312/372-2000

ONE POST OFFICE SQUARE  
BOSTON, MASSACHUSETTS 02109  
617/357-0200

2049 CENTURY PARK EAST  
LOS ANGELES, CALIFORNIA 90067  
213/277-4110

700 BRICKELL AVENUE  
MIAMI, FLORIDA 33131  
305/358-3500

FIRST NATIONAL BANK BUILDING  
SPRINGFIELD, ILLINOIS 62701  
217/522-7200

101 NORTH MONROE STREET  
TALLAHASSEE, FLORIDA 32301  
904/222-2312

June 19, 1987

DIRECT LINE  
202/ 778-8017

CONFIDENTIAL

BY HAND DELIVERY

Charles Snyder, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Room 357  
Washington, D.C. 20463

Re: MUR 2421  
American Dental Political Action Committee

Dear Mr. Snyder:

On behalf of our client, American Dental Political Action Committee ("ADPAC"), we hereby respond to your letter dated June 8, 1987, but received June 12, 1987.

In light of the discussion presented below, ADPAC respectfully requests that the Commission take no further action with respect to this matter. In the alternative, ADPAC requests the initiation of pre-probable cause conciliation regarding the alleged violation in accordance with 11 C.F.R. § 111.18(d). The following arguments and explanation should be taken into account by the Commission when considering this matter.

ADPAC has a stellar record with regard to its past performance. ADPAC has an excellent history of compliance with the Federal Election Campaign Act (the "Act"), particularly with the requirement to file reports in a timely manner. In the past, ADPAC has made good faith efforts to file its reports on a regular and timely basis. ADPAC is a conscientious committee which diligently attempts to comply fully with the Act and

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Charles Snyder, Esq.  
June 19, 1987  
Page Two

regulations. ADPAC's exemplary record should be a factor in the consideration of this matter.

Moreover, the alleged violation is an isolated incident which is the result of unique circumstances. The period of October-November of 1986 was an extremely busy and hectic time for ADPAC and its connected organization, the American Dental Association ("ADA"). The ADA was holding its annual meeting in Miami, Florida with which ADPAC was involved. In addition, ADPAC had recently experienced personnel changes within its staff. This annual meeting was the first meeting at which new personnel of ADPAC were to interact with a large number of ADA members. Accordingly, the ADPAC staffers were consumed with preparing for the annual meeting.

During this very busy time for ADPAC, there were miscommunications regarding the filing of the 12 Day Pre-General Election Report (the "Report"). Immediately upon learning that the Report had not been received by the Commission, ADPAC promptly contacted the Commission and filed its Report. See Attachment A. Specifically, ADPAC received notice from the Commission's Report Analysis Division on November 17, 1986. ADPAC immediately telephoned the Report Analyst that same day and submitted its report by hand delivery the next day.

ADPAC can assure that the alleged violation will not reoccur. Due to the miscommunication which occurred regarding the filing of the Report at issue, ADPAC has instituted measures to ensure the timely filing of future reports.

In light of the above, ADPAC respectfully requests that the Commission take no further action with respect to this matter. In the alternative, ADPAC requests that the pre-probable cause conciliation process take into account ADPAC's excellent history of compliance and the unique circumstances which resulted in the inadvertent action at issue. Again, ADPAC is confident that, as in the past, its future reports will be filed in a timely fashion.

I look forward to hearing from you.

Sincerely,

*Carolyn Kay Weeder*  
Carolyn Kay Weeder

CKW:kc  
Attachment

cc: Thomas Whitehead, Esq.  
Mr. Robert A. Carmines

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87040564807

ATTACHMENT A

**American Dental  
Political Action Committee**

November 18, 1986

**HAND DELIVERED**

Mr. Christopher Nuland  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

As per our conversation yesterday, please find enclosed our  
Committee's (I.D. #C00000729) 12-Day PreElection Report.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely,



Robert A. Carmines  
Executive Director

Enclosure

87040564808

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**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (In Full)  
**American Dental Political Action Committee**

---

Address (Number and Street)  
**1111 14th Street, N.W.  
Suite 1100**

---

City, State and ZIP Code  
**Washington, D.C. 20005**

---

Check here if address is different than previously reported.

---

2. FEC Identification Number  
**#C00000729**

---

3.  This committee qualified as a multicandidate committee during this Reporting Period on \_\_\_\_\_ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a)  April 15 Quarterly Report       October 15 Quarterly Report  
 July 15 Quarterly Report       January 31 Year End Report  
 July 31 Mid Year Report (Non-Election Year Only)  
 Monthly Report for \_\_\_\_\_  
 Twelfth day report preceding General Election  
(Type of Election)  
election on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Thirtieth day report following the General Election  
on \_\_\_\_\_ in the State of \_\_\_\_\_  
 Termination Report

(b) Is this Report an Amendment?  
 YES       NO

**SUMMARY**

5. Covering Period 10/1/86 through 10/15/86

6. (a) Cash on hand January 1, 19 86 .....

(b) Cash on Hand at Beginning of Reporting Period .....

(c) Total Receipts (from Line 18) .....

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(a) and 6(c) for Column B) .....

7. Total Disbursements (from Line 28) .....

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....

9. Debts and Obligations Owed TO The Committee .....

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee .....

(Itemize all on Schedule C or Schedule D)

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6(a)		\$ 365,604.18
6(b)	\$ 192,539.71	
6(c)	\$ 289.50	\$ 537,757.78
6(d)	\$ 192,829.21	\$ 903,361.96
7	\$ 37,750.00	\$ 748,282.75
8	\$ 155,079.21	\$ 155,079.21
9	\$	
10	\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information contact:

Robert A. Carmines  
Type or Print Name of Treasurer      **Assistant Treasurer**

Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463  
Toll Free 800-424-9530  
Local 202-376-3120

SIGNATURE OF TREASURER \_\_\_\_\_ Date 11/18/86

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4373.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

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FEC FORM 3X (3/80)

87040564809

6

**DETAILED SUMMARY PAGE  
of Receipts and Disbursements  
(Page 2, FEC FORM 3X)**

Name of Committee (in Full)

**American Dental Political Action Comm.**

Report Covering the Period:

From: **10/1/86** To: **10/15/86**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees . . . . . (Memo Entry Unitarized \$ _____ )		\$511,792.76	11(a)
(b) Political Party Committees . . . . .			11(b)
(c) Other Political Committees . . . . .			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c)) . . . . .			11(d)
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			12
<b>13. ALL LOANS RECEIVED . . . . .</b>			13
<b>14. LOAN REPAYMENTS RECEIVED . . . . .</b>			14
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) . . . . .</b>			15
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES . . . . .     AND OTHER POLITICAL COMMITTEES</b>			16
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.) . . . . .</b>	\$289.50	\$25,965.02	17
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17) . . . . .</b>	\$289.50	\$537,757.78	18
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES . . . . .</b>		\$8,382.75	19
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES . . . . .</b>			20
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND . . . . .     OTHER POLITICAL COMMITTEES</b>	\$37,750.00	\$745,650.00	21
<b>22. INDEPENDENT EXPENDITURES (use Schedule E) . . . . .</b>			22
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES . . . . .     (2 U.S.C. § 441 a(d)) (Use Schedule F)</b>			23
<b>24. LOAN REPAYMENTS MADE . . . . .</b>			24
<b>25. LOANS MADE . . . . .</b>			25
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees . . . . .			26(a)
(b) Political Party Committees . . . . .			26(b)
(c) Other Political Committees . . . . .			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c)) . . . . .			26(d)
<b>27. OTHER DISBURSEMENTS . . . . .</b>			27
<b>28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) . . . . .</b>	\$37,750.00	\$748,282.75	28
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d) . . . . .</b>		\$511,792.76	29
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d) . . . . .</b>		\$5,750.00	30
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29) . . . . .</b>		\$506,042.76	31
<b>32. TOTAL OPERATING EXPENDITURES from Line 19 . . . . .</b>		\$8,382.75	32
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15 . . . . .</b>			33
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32) . . . . .</b>		\$8,382.75	34

R 7 0 4 0 5 6 4 8 1 0

6

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports or 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 Dental Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>Century National Bank</b> <b>1875 Eye Street</b> <b>Washington, D.C. 20006</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/1/86	\$83.28
Aggregate Year-to-Date-\$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>Century National Bank</b> <b>1875 Eye Street</b> <b>Washington, D.C. 20006</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/8/86	\$95.18
Aggregate Year-to-Date-\$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
<b>Century National Bank</b> <b>1875 Eye Street</b> <b>Washington, D.C. 20006</b> Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	10/15/86	\$111.04
Aggregate Year-to-Date-\$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
Aggregate Year-to-Date-\$			
SUBTOTAL of Receipts This Page (optional) . . . . .			
TOTAL This Period (last page this line number only) . . . . .			\$289.50

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6

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)			
<b>American Dental Political Action Committee</b>			
A. Full Name, Mailing Address and ZIP Code <b>Friends of Frank Wolf</b> P.O. Box 1055 Vienna, VA 22180	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/1/86	\$1,000
B. Full Name, Mailing Address and ZIP Code <b>Dan Burton for Congress Committee</b> 8165 Upper Bay Lane Indianapolis, IN 46236	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$1,000
C. Full Name, Mailing Address and ZIP Code <b>Niedermeier Campaign Committee</b> 3063 Fairfield Avenue Bridgeport, CT 06605	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$500
D. Full Name, Mailing Address and ZIP Code <b>Gejdenson for Congress</b> P.O. Box 1986 Bozrah, CT 06334	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$1,000
E. Full Name, Mailing Address and ZIP Code <b>Morrison Election Committee</b> P.O. Box 303 New Haven, CT 06502	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$1,000
F. Full Name, Mailing Address and ZIP Code <b>Committee to Elect Stewart McKinney</b> P.O. Box 338 Fairfield, CT 06430	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$1,000
G. Full Name, Mailing Address and ZIP Code <b>Committee to Reelect Congresswoman Nancy Johnson</b> 17 Gessford Ct., S.E. Washington, D.C. 20003	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$1,000
H. Full Name, Mailing Address and ZIP Code <b>Missourians for Kit Bond</b> 8600 Ward Parkway, Suite 205 Kansas City, MO 64114	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$4,500
I. Full Name, Mailing Address and ZIP Code <b>Conrad Campaign</b> P.O. Box 747 Bismarck, N.D. 58502	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): <b>X</b>	10/2/86	\$500
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			

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6

SCHEDULE B

ITEMIZED DISBURSEMENTS

All 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 Dental Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>Tom Shimizu for Congress</b> P.O. Box 21804 Salt Lake City, UT 84121	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/2/86	\$1,500
<b>Spence for Congress Committee</b> P.O. Box 11378 Columbia, S.C. 29211	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	\$1,000
<b>Bill Workman for Congress</b> 100 College Street Greenville, SC 29602	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	\$1,500
<b>Ravenel for Congress</b> 635 East Bay Street Charleston, SC 29403	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/6/86	\$1,500
<b>Vucanovich for Congress Committee</b> P.O. Box 21435 Reno, NV 89515	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/7/86	\$500
<b>Denton for Senate</b> P.O. Box 360201 Birmingham, AL 35236	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/7/86	\$5,000
<b>Mike Norton for Congress</b> P.O. Box 1986 Arvada, CO 80001	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/7/86	\$1,000
<b>Joel Hefley for Congress</b> 2160 G. Vickers Colorado Springs, CO 80907	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/7/86	\$1,000
<b>Kyl for Congress</b> 815 E. Camelback Phoenix, AZ 85014	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/8/86	\$1,000

SUBTOTAL of Disbursements This Page (optional) .....

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

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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 Dental Political Action Committee**

87040564814

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>John Lewis for Congress Committee</b> 354 Peachtree Street, N.W. Atlanta, GA 30301	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/8/86	\$1,000
<b>McIntee for Congress</b> 327 East 4th Street Waterloo, Iowa 50703	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/9/86	\$2,500
<b>Margaret Lowenthal Campaign for Congress</b> 101 Pithon Street Lake Charles, LA 70601	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/9/86	\$1,000
<b>Fred Grandy for Congress</b> 525 5th Street Sioux City, Iowa 51101	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/9/86	\$1,000
<b>Canada for Congress</b> 1062 Laskin Road Virginia Beach, VA 23451	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/9/86	\$250
<b>Bill Gray for Congress Committee</b> P.O. Box 15038 Philadelphia, PA 19125	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/10/86	\$2,000
<b>Chavez for Senate</b> P.O. Box 8608 Silver Spring, MD 20907	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/14/86	\$1,000
<b>Brennan for Congress Committee</b> P.O. Box 5373 Augusta, Maine 04330	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/14/86	\$1,500
<b>Friends of Newt Gingrich</b> P.O. Box 130 Riverdale, GA 30274	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	10/14/86	\$1,000
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			

SCHEDULE B

ITEMIZED DISBURSEMENTS

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 Dental Political Action Committee**

87040564815

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<b>Friends and Neighbors of Steve Gunderson</b> <b>Box 1986</b> <b>Osseo, WI 54758</b>	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>10/15/86</b>	<b>\$1,000</b>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
SUBTOTAL of Disbursements This Page (optional) .....			
TOTAL This Period (last page this line number only) .....			<b>\$37,750.00</b>

**SENSITIVE**

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
American Dental Political Action	)	MUR 2421
Committee and Dr. David Sampe,	)	
as treasurer	)	

67 JUL 15 AIC: 27

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

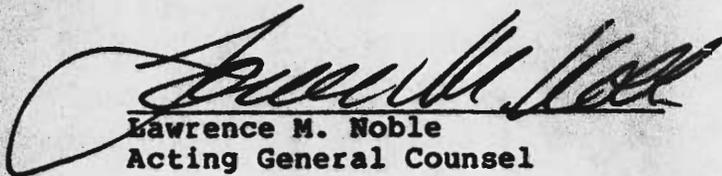
On May 21, 1987, the Commission found reason to believe that the American Dental Political Action Committee ("ADPAC") and Dr. David Sampe, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). The basis for that finding was that ADPAC failed to file its (1986) 12 Day Pre-General Election Report, due October 23, 1986, until November 18, 1986. Respondents, on June 19, 1987, requested pre-probable cause conciliation. (See Attachment 1.)

87040564816

**III. RECOMMENDATIONS**

1. Enter into conciliation with the American Dental Political Action Committee and Dr. David Sampe, as treasurer, prior to a finding of probable cause to believe.
2. Approve the attached proposed conciliation agreement and letter.

Date 7/14/57

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Request for Conciliation
2. Proposed conciliation agreement and letter

87040664817



BALLOT.

18

SENSITIVE



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

DATE & TIME TRANSMITTED: WEDNESDAY, JULY 15, 1987 4:00

COMMISSIONER: AIKENS, ELLIOTT, JOSEPIAK, McDONALD, McGARRY, THOMAS

RETURN TO COMMISSION SECRETARY BY FRIDAY, JULY 17, 1987 4:00

SUBJECT: MUR 2421 - General Counsel's Report  
Signed July 14, 1987

87 JUL 17 AM 4:40

SECRETARY

87040564819

- I approve the recommendation
- I object to the recommendation

COMMENTS: Several corrections needed on agreement and letter. See J. Warner.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DATE: 7/17/87 SIGNATURE [Signature]

A DEFINITE VOTE IS REQUIRED. ALL BALLOTS MUST BE SIGNED AND DATED.  
PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.  
PLEASE RETURN BALLOT NO LATER THAN DATE AND TIME SHOWN ABOVE.

8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
American Dental Political Action ) MUR 2421  
Committee and Dr. David Sampe, )  
as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2421:

1. Enter into conciliation with the American Dental Political Action Committee and Dr. David Sampe, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed conciliation agreement and letter, as recommended in the General Counsel's Report signed July 14, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

7-17-87

Date

Marjorie W. Emmons

Marjorie W. Emmons for  
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 7-15-87, 10:27  
Circulated on 48 hour tally basis: Wed., 7-15-87, 4:00  
Deadline for vote: Fri., 7-17-87, 4:00

/jm/

87040564820



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1987

Ms. Carolyn Kay Weeder, Esquire  
McDermott, Will & Emery  
1850 K Street, N.W.  
Washington, D.C. 20006

RE: MUR 2421  
American Dental Political  
Action Committee and  
Dr. David Sampe, as  
treasurer

Dear Ms. Weeder:

On May 21, 1987, the Federal Election Commission found reason to believe that the American Dental Political Action Committee and Dr. David Sampe, as treasurer, violated 2 U.S.C. § 434(a)(4)(B). At your request, on July 17, 1987, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

*Lawrence M. Noble*  
Lawrence M. Noble  
Acting General Counsel

Enclosure  
Conciliation Agreement

87040564821

*John*

**SENSITIVE**

07 SEP 17 PM 4:41

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAL

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )

American Dental Political Action Committee )  
and Dr. David Sanpe, as treasurer )

MUR 2421

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

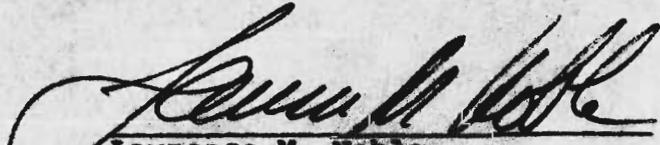
Attached is a conciliation agreement which has been signed by Carolyn Kay Weeder, counsel for the American Dental Political Action Committee and Dr. David Sanpe, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on July 17, 1987. A check for the civil penalty has been received.

**II. RECOMMENDATIONS**

1. Accept the attached conciliation agreement with the American Dental Political Action Committee and Dr. David Sanpe, as treasurer.
2. Close the file.
3. Approve the attached letter.

Date 9/17/87

  
Lawrence M. Noble  
Acting General Counsel

**Attachments**

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent

87040664822

Snyder

attached 2

GCC # 4237

AMERICAN DENTAL POLITICAL ACTION COMMITTEE

1111 - 14TH STREET, N.W., SUITE 1100  
WASHINGTON, D.C. 20005

1159

Aug. 21 19 87

15-157  
540

PAY TO THE ORDER OF Federal Election Commission \$ 925.00

AOPAC 92500 CTS

DOLLARS



Max Hill DDS  
Treasurer

⑆001159⑆ ⑆054001576⑆ ⑆01 001183 01⑆

GCC # 4237

MEMORANDUM

TO: DEBRA A. TRIMIEW TO: CECILIA LIEBER  
FROM: CECILIA LIEBER FROM: DEBRA A. TRIMIEW

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 AUG 26 PM 1:27

CHECK NO. 1159 ( A COPY OF WHICH IS ATTACHED ) RELATING TO  
MUR 2421 AND NAME American Dental Political Action Committee  
and Dr. David Sampe, as treas.

WAS RECEIVED ON 8/26/87 . PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

- / ✓ / BUDGET CLEARING ACCOUNT ( 953875.16 )
- / / CIVIL PENALTIES ACCOUNT ( 95-1099.160 )
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 8/26/87



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**MEMORANDUM TO:** LAWRENCE M. NOBLE  
ACTING GENERAL COUNSEL

**FROM:** MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

**DATE:** SEPTEMBER 22, 1987

**SUBJECT:** COMMENTS TO MUR 2421 - General Counsel's Report  
Signed September 17, 1987

Attached is a copy of Commissioner Thomas's vote sheet with comments regarding the above-captioned matter.

870440564824

Attachment:  
copy of vote sheet

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
American Dental Political Action Committee ) MUR 2421  
and Dr. David Sampe, as treasurer )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 22, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2421:

1. Accept the conciliation agreement with the American Dental Political Action Committee and Dr. David Sampe, as treasurer, as recommended in the General Counsel's report signed September 17, 1987.
2. Close the file.
3. Approve the letter, as recommended in the General Counsel's report signed September 17, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

9-23-87

Date

*Marjorie W Emmons*

Marjorie W. Emmons  
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	9-17-87,	4:41
Circulated on 48 hour tally basis:	Fri.,	9-18-87,	12:00
Deadline for vote:	Tues.,	9-22-87,	4:00

87040364825



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

25 September 1987

Carolyn Kay Weeder, Esquire  
McDermott, Will and Emery  
1850 K Street, N.W.  
Washington, D.C. 20006

RE: MUR 2421  
American Dental Political  
Action Committee and  
Dr. David Sampe, as  
treasurer

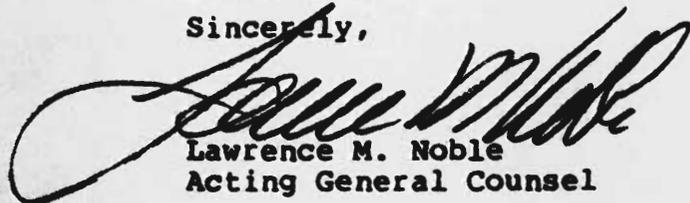
Dear Ms. Weeder:

On September 22, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(a)(4)(B), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Charles Snyder, the attorney assigned to this matter at (202) 376-8200.

Sincerely,



Lawrence M. Noble  
Acting General Counsel

Enclosure  
• Conciliation Agreement

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*flm*

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 American Dental Political Action ) MUR 2421  
 Committee and Dr. David Sampe, )  
 as treasurer )

RECEIVED  
 FEDERAL ELECTION COMMISSION  
 OFFICE OF GENERAL COUNSEL  
 07 AUG 26 PM 1:26

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that American Dental Political Action Committee and Dr. David Sampe, as treasurer, ("Respondents"), violated 2 U.S.C. § 434(a)(4)(B).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, American Dental Political Action Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

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2. Respondent, Dr. David Sanpe, is the treasurer of American Dental Political Action Committee.

3. Respondents were required by 2 U.S.C. § 434(a)(4)(B) to file their (1986) 12 Day Pre-General Election Report by October 23, 1986.

V. Respondents' failure to file their 1986 12 Day Pre-General Election Report in a timely manner was in violation of 2 U.S.C. § 434(a)(4)(B).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Nine Hundred Twenty-Five Dollars (\$925.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

  
Lawrence M. Noble  
Acting General Counsel

9/24/87  
Date

FOR THE RESPONDENTS:

Carolyn Kay Weeder  
(Name) Carolyn Kay Weeder  
(Position)

August 21, 1987  
Date

McDermott, Will & Emery  
1850 K Street, N.W.  
Suite 500  
Washington, D.C. 20006  
(202) 887-8000

Counsel for American Dental  
Political Action Committee

87040564829



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20463

THIS IS THE END OF MUR # 2421

DATE FILMED 11/25/87 CAMERA NO. 3

CAMERAMAN AS

87040564830



FEDERAL ELECTION COMMISSION  
WASHINGTON DC 20461

M12-28-87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE  
PUBLIC FILE OF CLOSED MUR 2421

88040670118

GCC # 4237

AMERICAN DENTAL POLITICAL ACTION COMMITTEE

1111 - 14TH STREET, N.W., SUITE 1100  
WASHINGTON, D.C. 20005

1159

Aug. 21 19 87

15-157  
540

PAY TO THE ORDER OF Federal Election Commission \$ 925.00

ADPAC 925 00 00

DOLLARS



Man 7/26/87 DDS  
CHAIRMAN  
David Sampe DDS  
TREASURER

001159 0540015761 01 001183 01

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C  
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C

GCC # 4237

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

87 AUG 26 PM 1:27

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL

CHECK NO. 1159 { A COPY OF WHICH IS ATTACHED } RELATING TO  
MUR 2421(Snyder) AND NAME American Dental Political Action Committee  
and Dr. David Sampe, as treas.

WAS RECEIVED ON 8/26/87 . PLEASE INDICATE THE ACCOUNT INTO  
WHICH IT SHOULD BE DEPOSITED:

- / ✓ / BUDGET CLEARING ACCOUNT { 95F3875.16 }
- / / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
- / / OTHER \_\_\_\_\_

SIGNATURE Debra A. Trimiew DATE 8/26/87

**McDERMOTT, WILL & EMERY**

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1850 K STREET, N. W.

WASHINGTON, D. C. 20006

202/887-8000

FACSIMILE 202/778-8087

TELEX 904261 MILAM WASH

700 BRICKELL AVENUE

MIAMI, FLORIDA 33131

305/358-3500

FIRST NATIONAL BANK BUILDING

SPRINGFIELD, ILLINOIS 62701

217/522-7200

101 NORTH MONROE STREET

TALLAHASSEE, FLORIDA 32301

904/222-2312

111 WEST MONROE STREET

CHICAGO, ILLINOIS 60603

312/372-2000

ONE POST OFFICE SQUARE

BOSTON, MASSACHUSETTS 02109

617/357-0200

2049 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067

213/277-4110

August 21, 1987

DIRECT LINE

202/ 778-8017

BY HAND DELIVERY

Charles Snyder, Esq.  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 2421

Dear Mr. Snyder:

On August 20, 1987, we received on behalf of the American Dental Political Action Committee ("ADPAC") the Federal Election Commission's proposed conciliation agreement regarding the above-referenced matter. In the continued spirit of full cooperation with the Commission, ADPAC has executed the Commission's proposed conciliation agreement and has enclosed a check accordingly.

Sincerely,

Carolyn Kay Weeder

CKW:kc  
Enclosures

cc: Mr. Robert A. Carmines (w/enclosures)

RECEIVED  
FEDERAL ELECTION COMMISSION  
OFFICE OF GENERAL COUNSEL  
87 AUG 26 PM 1:26

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*sent to OGC 8-26-87*