



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2005 OCT -3 P 1: 55  
September 30, 2005

**MEMORANDUM**

TO: The Commission

THROUGH: James A. Pehrkon  
Staff Director

FROM: Allan D. Silberman  
Director ADR Office

SUBJECT: ADR 294 - Pennsylvania Medical Society PAC Federal and Larry Light, Treasurer  
Recommendation to Assign Case

**SENSITIVE**

On September 22, 2005, the ADR Office received from RAD RR 05L-46 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case, **ADR 294**, is appropriate for ADR and recommend that it be assigned to the ADR Office.

**Summary:** RAD referred the PA Medical Society PAC Federal and Larry Light, Treasurer, (the "Respondents") for amending their 2003 Year End Report to disclose additional receipts totaling \$197,650, representing an 809% increase in financial activity, and \$173,304.68 in additional disbursements, representing a 69,322 % increase. In response to a RFAI sent on November 12, 2004, Respondents advised that the increase in receipts and disbursements on the Committee's Amended 2003 Year End Report was due to a technical error that occurred during the transfer of data to the FECfile. Respondents stated that after learning that their reporting program had not performed correctly they filed the amended report disclosing the additional receipts and disbursement.

Attached for the Commission's review is the *ADR Case Analysis Report* on **ADR 294** along with a copy of the EPS and ADR Rating Sheets. The *Case Analysis Report* includes an analysis of the case and a description of the issues that the ADR Office (ADRO) anticipates addressing if the case is assigned to ADR. In addition, the Report has been reviewed by OGC, which concurs in the description of the case. If the Commission concurs in the recommendation to assign the matter to ADRO, the above case description will be provided to Respondents as part of ADRO's notification package sent to Respondents.

**Recommendation:**

1. Assign **ADR 294/RR 05L-46** to the ADR Office.

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## ADR CASE ANALYSIS REPORT

ADR Case: 294

Respondents: PA Medical Society PAC  
Larry Light, Treasurer

RR: 05L-46

Respondents Rep: Larry Light

Case Opened: 8-11-05

Committee Type: Unaffiliated

Date Forwarded to ADRO: 8-22-05

Committee Name: PA Medical Society PAC

Date Reviewed by ADRO: 8-30-05

Election Cycle: 2004

District #/or State: N/A

Election: N/A

Complainants: RAD Referral

**Summary of Referral:** RAD referred Respondents for amending their 2003 Year End Report to disclose additional receipts totaling \$197,650, representing an 809% increase in financial activity, and \$173,304.68 in additional disbursements, representing a 69,322 % increase. The Committee's original 2003 Year End Report (filed on January 8, 2004, covering the period from July 1, 2003 through December 31, 2003) disclosed \$624.00 for Itemized Contributions from Individuals/Persons Other Than Political Committee, \$9398.50 for Unitemized Contributions from Individuals/Persons Other Than Political Committees, \$24,436.37 for Total Federal Receipts, \$0.00 for Transfers to Affiliated Committees and \$0.00 for Other Disbursements.

On October 14, 2004, the Committee filed an amended 2003 Year End Report which disclosed \$95,128.76 for Itemized Contributions from Individuals/Persons Other Than Political Committees, \$112,545.50 for Unitemized Contributions from Individuals/Persons Other Than Political Committees, \$222,087.13 for Total Federal Receipts, \$50,050.00 for Transfers to Affiliated Committees and \$123,504.68 for Other Disbursements.

**Respondents' Reply:** In response to a RFAI sent on November 12, 2004, Respondents advised that the increase in receipts and disbursements on the Committee's Amended 2003 Year End Report was due to a technical error that occurred during the transfer of data to the FECfile. In a subsequent Amended Report, which disclosed no change in receipt and disbursement totals, Respondents noted that the Report was amended due to the aforementioned RFAI. Respondents stated that after learning that their reporting program had not performed correctly they filed the amended report disclosing the additional receipts and disbursement.

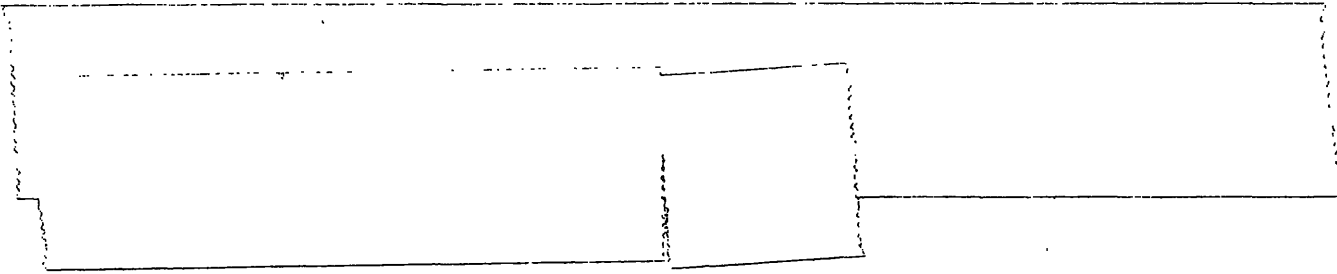
**Analysis:** Committees are obliged to disclose the total amount of all receipts and all receipts for contributions for persons other than political committees, identify each person, other than a political

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committee, who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions have an aggregate amount or value in excess of \$200 within the calendar year, political committees which makes a contribution to the reporting committee during the reporting period, affiliated committees which makes a transfer to the reporting committee during the reporting period and the total sum of all contributions to such political committee. 2 U.S.C. §§ 434(b)(2), (b)(3), (b)(7) and 11 C.F.R. § 104.3(a)(2). In addition, Committees are required to disclose for the reporting period the total amount of all disbursements including transfers to affiliated committees. 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 104.3(b). To the Committee's credit, it came forward, prior to being contacted by RAD, and disclosed in an Amended 2003 Year End Report the additional receipts and disbursements. Respondents, however, acknowledged their responsibility for correctly reporting their receipts and disbursements.

**Issue:**

- Reporting of Receipts, 2 U.S.C. § 434(b)(2), (3), (7) and 11 C.F.R. § 104.3(a)
- Reporting of Disbursements, 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 104.3(b)



**Recommendation: Assign to ADR**

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