



Federal Election Commission  
Washington, DC 20463

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**MEMORANDUM**

August 9, 2007

**SENSITIVE**

TO: The Commission

THROUGH: Patrina M. Clark  
Staff Director

FROM: John D. Gibson  
Chief Compliance Officer

Deborah Ruth Kant  
Director, ADR Office

SUBJECT: ADR 410, American Veterinary Medical Association, PAC ("AMAC, PAC"), Dr. Vern Otte, Treasurer, Recommendation to Assign

On July 31, 2007, the ADR Office received RAD 07L-26 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR, and recommend that it be assigned to the ADR Office. The ADR Office Memorandum includes a summary and discussion of the case, and a Recommendation. In addition, the Office of General Counsel reviewed the ADR Memorandum, and concurs in the description of the case.

**ADR Case:** 410

**Source No.** 07L-26

**Respondents:** American Veterinary Medical Association PAC, ("AMAC, PAC")  
**Respondent's Rep.:** Dr. Vern Otte  
Dr Vern Otte, Treasurer

**Complainant:** N/A

**Committee Name:** AMAC, PAC

**Referral:** RAD

**Committee Type:** unauthorized

27190273394

**Summary and Discussion of Case:** Treasurers of political committees are required to report all financial activity, including all receipts. 2 U.S.C. § 434(b)(2), 11 C.F.R. § 104.3(a). In this case, Respondents (or “the Committee”) failed to disclose \$52,221 in additional receipts on its 2006 30 Day Post-General Report. The Committee filed the original report on December 7, 2006 and amended it on January 4, 2007 with the additional receipts. In response to the RFAI and other inquiries by RAD concerning the amended report, the Committee explained that due to the high volume of contributions during the time period covered by the 30 Day Post General Report, the Committee could not upload the receipts into the reporting software until the day after the report was filed.<sup>1</sup>

**RECOMMENDATION:**

1. **Assign ADR 410/RAD 07L-26 to the ADR Office.**

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<sup>1</sup> In an earlier electronic submission, the Committee had contended that the coverage dates it had put in the report were incorrect (11/23/2004 to 12/31/2004), and the incorrect dates accounted for the discrepancy in the receipts. RAD then explained that the coverage dates on the report were correct and that the Committee’s explanation was inadequate. The Committee did not include this explanation in the subsequent response described above