



THE FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

October 19, 2007

TO: The Commission

THROUGH: Patrina M. Clark *OK
pm*
Staff Director

FROM: John D. Gibson *jd*
Chief Compliance Officer

Deborah Ruth Kant *DRK
nn*
Director, ADR Office

SUBJECT: ADR 410 American Veterinary Medical Association PAC, and Dr. John de Jong Treasurer, Recommendation to Approve Settlement Agreement¹

RESOLUTION TERMS: Certification of 2006 Audit Results to the Commission; hire a compliance firm; draft and submit statement of internal controls; and civil penalty of \$1,000 (amount in dispute \$52,221)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 410 (RAD 07L-26)**. This case was received by the ADR Office on July 31, 2007, and was assigned to the ADR Office on August 14, 2007.

SUMMARY: 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,

¹ Dr John de Jong has replaced Dr. Vern Otte as treasurer.

the Committee could not upload the receipts into the reporting software until the day after the report was filed.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of American Veterinary Medical Association PAC and Dr. John de Jong, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.