



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 8, 2000

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JAMES A. PEHRKON
STAFF DIRECTOR

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

SUBJECT: REFERRAL OF THE AMERICAN MEAT INSTITUTE POLITICAL
ACTION COMMITTEE

This is a referral of the American Meat Institute Political Action Committee ("the Committee") for failure to file the 2000 April Quarterly Report within thirty (30) calendar days from the date of the Non-Filer Notice. According to the 1999-2000 RAD Review and Referral Procedures for Unauthorized Committees further examination is required by your office.

If you have any questions regarding this matter, please contact Lucy J. Denny at 694-1130.

Attachment

IV. RECOMMENDATIONS


1. Open a MUR.
2. Find reason to believe that American Meat Institute - PAC and Sara J. Lilygren, as treasurer, violated 2 U.S.C. § 434 (a)(4)(A)(i), and enter into conciliation with Respondents prior to a finding of probable cause to believe.
3. Approve the attached proposed Factual and Legal Analysis, conciliation agreement and the appropriate letter.

Lawrence M. Noble
General Counsel

Date

9/26/00

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Factual and Legal Analysis
2. Proposed Conciliation Agreement

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: August 8, 2000

ANALYST: Lucy J. Denny

- I. COMMITTEE: American Meat Institute Political Action Committee
(C00024281)
Sara J. Lilygren, Treasurer
1700 N. Moore Street, Room 1600
Arlington, VA 22209
- II. RELEVANT STATUTE: 2 U.S.C §434(a)(4)(A)(i)
11 CFR §104.5(c)(1)(i)(A)
- III. BACKGROUND:

Failure to Timely File the 2000 April Quarterly Report

The American Meat Institute Political Action Committee ("the Committee") failed to timely file the 2000 April Quarterly Report of Receipts and Disbursements covering the period from January 1, 2000 to March 31, 2000. On December 29, 1999 and March 22, 2000, Prior Notices were sent to the Committee informing it that the 2000 April Quarterly Report was due on April 15, 2000 (Attachments 2 and 3). A Non-Filer Notice was sent to the Committee via mailgram on May 10, 2000 (Attachment 4).

On June 8, 2000, the Reports Analysis Division ("RAD") analyst attempted to call Ms. Sara Lilygren, Treasurer; however, she was not available. The RAD analyst was transferred to Ms. Lilygren's assistant, Mr. Lawrence Webb. Mr. Webb acknowledged that the 2000 April Quarterly Report was late. He said there had been a computer problem preventing the disclosure of a \$15,000 disbursement,

AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

and that the Committee did not want to file a report that was incorrect. The RAD analyst advised him to file the report and when the computer problem was corrected, to file an amendment to disclose the disbursement (Attachment 5).

The Committee filed the report on June 14, 2000 (Attachments 6).

2000-06-14 10:44:23

1999-2000

Attachment # 1

COMM INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	IMAGE LOCATION
						TYPE OF FILER
AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE				ID #C00024281	NON-PARTY QUALIFIED	
CONNECTED ORGANIZATION: MEAT INSTITUTE; AMERICAN						
1999	APRIL QUARTERLY			1JAN99 -31MAR99	16	99FEC/451/0455
	MID-YEAR REPORT	91,115	50,000	1JAN99 -30JUN99	58	99FEC/465/0997
	MID-YEAR REPORT - AMENDMENT	91,415	50,000	1JAN99 -30JUN99	57	20FEC/500/4845
	REQUEST FOR ADDITIONAL INFORMATION			1JAN99 -30JUN99	2	99FEC/494/3729
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN99 -30JUN99	3	20FEC/500/0493
	YEAR-END	30,290	14,300	1JUL99 -31DEC99	13	20FEC/511/4089
	YEAR-END - AMENDMENT			1JUL99 -31DEC99	5	20FEC/546/1198
	REQUEST FOR ADDITIONAL INFORMATION			1JUL99 -31DEC99	2	20FEC/533/3838
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL99 -31DEC99	3	20FEC/538/4083
2000	APRIL QUARTERLY	30,695	47,000	1JAN00 -31MAR00	22	20FEC/565/1076
	NOTICE OF FAILURE TO FILE			1JAN00 -31MAR00	2	20FEC/558/0555
	REQUEST FOR ADDITIONAL INFORMATION			1JAN00 -31MAR00	3	20FEC/587/4913
	JULY QUARTERLY	36,365	32,000	1APR00 -30JUN00	33	20FEC/578/3652
	TOTAL	188,765	0 143,300	0	219	TOTAL PAGES

All Reports reviewed except July Quarterly.

Cash on hand as of 6/30/00: \$ 99,290.38

Debt owed to the Committee: \$ 0.00

Debt owed by the Committee: \$ 0.00

YEAR-END

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 29, 1999

WHO MUST FILE

Party committees and PACs (Nonconnected Committees and Separate Segregated Funds) must file a Year-End Report on January 31, 2000.

I. Semi-annual Filers

REPORT	REPORTING PERIOD ¹	REG./CERT. MAILING DATE ²	FILING DATE
Year-End	07/01/99 - 12/31/99	01/31/00	01/31/00

II. Monthly Filers

REPORT	REPORTING PERIOD ¹	REG./CERT. MAILING DATE ²	FILING DATE
Year-End	12/01/99 - 12/31/99	01/31/00	01/31/00

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

COMPLIANCE

Treasurers of political committees are responsible for the accuracy of all reports and for filing all reports on time. Treasurers may be subject to enforcement action if reports are not filed timely or reports are inaccurate. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

ELECTRONIC FILING

Political committees have the option of filing electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing of Disclosure Reports," and call the Data Division at (800) 424-9530 or (202) 694-1306.

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

(over)

PARTIES AND PACS

YEAR-END

2000 FILING SCHEDULE

I. QUARTERLY FILERS

REPORT	REPORTING PERIOD ¹	REG./CERT. MAILING DATE ²	FILING DATE
April Quarterly	01/01/00 - 03/31/00	04/15/00	04/15/00 ³
July Quarterly	04/01/00 - 06/30/00	07/15/00	07/15/00 ³
October Quarterly	07/01/00 - 09/30/00	10/15/00	10/15/00 ³
Pre-General	10/01/00 - 10/18/00	10/23/00	10/26/00
Post-General	10/19/00 - 11/27/00	12/07/00	12/07/00
Year-End	11/28/00 - 12/31/00	01/31/01	01/31/01

II. MONTHLY FILERS

REPORT	REPORTING PERIOD ¹	REG./CERT. MAILING DATE ²	FILING DATE
February	01/01/00 - 01/31/00	02/20/00	02/20/00 ³
March	02/01/00 - 02/29/00	03/20/00	03/20/00
April	03/01/00 - 03/31/00	04/20/00	04/20/00
May	04/01/00 - 04/30/00	05/20/00	05/20/00 ³
June	05/01/00 - 05/31/00	06/20/00	06/20/00
July	06/01/00 - 06/30/00	07/20/00	07/20/00
August	07/01/00 - 07/31/00	08/20/00	08/20/00 ³
September	08/01/00 - 08/31/00	09/20/00	09/20/00
October	09/01/00 - 09/30/00	10/20/00	10/20/00
Pre-General	10/01/00 - 10/18/00	10/23/00	10/26/00
Post-General	10/19/00 - 11/27/00	12/07/00	12/07/00
Year-End	11/28/00 - 12/31/00	01/31/01	01/31/01

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 2000 Record.

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any Party Committee or PAC that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

21.04.00 3516

³Note that filing dates are not extended when they fall on nonworking days. The FEC and Secretary of the Senate, however, will be open to receive reports on April 15, July 15 and October 15.

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

21.04.02.3517

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 2000

WHO MUST FILE

All Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) filing on a quarterly basis must file a Quarterly Report in April.

REPORTING DATES

REPORT	REPORTING PERIOD ¹	REG./CERT.	FILING
		MAILING DATE ²	DATE
April Quarterly	01/01/00 - 03/31/00	04/15/00	04/15/00 ³

24 HOUR REPORT ON INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with an election may have to file a 24 hour report. This reporting requirement is triggered if the committee makes independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the day of the election. This report is *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See the January 2000 Record.

LABEL

Committees should affix the peel-off label from the envelope to line 1 of the report. Corrections should be made on the label.

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Reports sent by registered or certified mail must be postmarked by the mailing date; otherwise, they must be received by the filing date.

³Note that the filing date is a Saturday. Filing dates are not extended when they fall on nonworking days; however, the FEC and Secretary of the Senate will be open to receive reports on April 15.

PARTIES AND PACS**April Quarterly****CHANGE IN FILING FREQUENCY**

Committees wishing to change their reporting schedule (for example, from quarterly to monthly) must notify the Commission in writing when they file their next report due under their current reporting schedule. Committees may change their filing frequencies no more than once per calendar year.

ELECTRONIC FILING

Political committees have the option of filing their reports electronically. If you are interested in this option, review the enclosed handout entitled "Electronic Filing," and call the Data Division at (800) 424-9530 or (202) 694-1306.

COMPLIANCE

Treasurers of political committees are responsible for the accuracy of all reports and for filing all reports on time. Treasurers may be subject to enforcement action if reports are not filed timely or reports are inaccurate. Committees filing illegible reports or using non-FEC forms (except for FEC approved computer generated forms) will be required to refile.

**WESTERN
UNION**

WESTERN UNION COMMERCIAL SERVICES
CONFIRMATION OF MAILGRAM TO: SARA J LILYGREN
AMERICAN HEAT INSTITUTE PAC
1700 N MOORE ST STE 1600
ARLINGTON VA 22209-1995

FEDERAL ELECTION COMMISSION
SHAWN WERTH
999 E ST. NW.
WASHINGTON DC 204630001

MAY 10, 2000

IDENTIFICATION NUMBER: C00024281

REFERENCE: APRIL QUARTERLY REPORT (01/01/2000 - 03/31/2000)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS SHOULD ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER, UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

ALTHOUGH THE COMMISSION MAY INITIATE AN AUDIT OR LEGAL ENFORCEMENT ACTION CONCERNING THIS MATTER, YOUR PROMPT RESPONSE AND A LETTER OF EXPLANATION WILL BE TAKEN INTO CONSIDERATION.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT LUCY DENNY ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISIO

TELECON

ANALYST:	Lucy J. Denny
COMMITTEE:	American Meat Institute
SUBJECT(S):	Failure to File Report

DATE:	June 8, 2000
CONVERSATION WITH:	Lawrence Webb

The RAD analyst attempted to contact Ms. Sara Lilygren; however, she was on vacation so the analyst was transferred to her assistant, Mr. Lawrence Webb. Mr. Webb told the analyst that the report was finished except for the disclosure of one \$15,000 disbursement due to a computer glitch. He said he did not want to send the report in showing \$15,000 more than the Committee actually had. He said the problem was being fixed, and he would probably be able to send the report in the next day (6/9/00). The RAD analyst told him to send the report even if the problem does not get resolved and amend it later.

REPORT OF RECEIPTS AND DISBURSEMENTS

Attachment # 6

For Other Than An Authorized Committee

RECEIVED
FEC MAIL ROOM

(Summary Page)

2000 JUN 14 P 12:22

USE FEC MAILING LABEL
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) American Meat Institute PAC		2. FEC IDENTIFICATION NUMBER C00024281
ADDRESS (Number and Street) <input type="checkbox"/> Check if different than previously reported 1700 North Moore Street, Suite 1600		
CITY, STATE and ZIP CODE Arlington, Virginia 22209		
3. <input type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)		

4. TYPE OF REPORT

(a) ☒ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On:

☐ February 20☐ June 20☐ October 20☐ March 20☐ July 20☐ November 20☐ April 20☐ August 20☐ December 20☐ May 20☐ September 20☐ January 31☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment?

☐ YES☒ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>01/01/00</u> through <u>03/31/00</u>		
6. (a) Cash on Hand January 1, 19 <u>00</u>		\$94,925.36
(b) Cash on Hand at Beginning of Reporting Period	\$94,925.36	
(c) Total Receipts (from Line 19)	\$30,695.00	\$30,695.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$125,620.36	\$125,620.36
7. Total Disbursements (from Line 30)	\$47,000.00	\$47,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$78,620.36	\$78,620.36
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$0.00	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (itemize all Schedule C and/or Schedule D)	\$0.00	

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

Type or Print Name of Treasurer

Sara J. Lillygren

Signature of Treasurer

Date

6-13-00

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 9/93)