FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

DEC 7 1994

Dennis E. Walters, Treasurer
Cargill, Incorporated Political
Action Committee
P.O. Box 9300/Dept. 5
Minneapolis, MN 55440

Identification Number: C00067684

Reference: 12 Day Pre-General Report (10/1/94-10/19/94)

Dear Mr. Walters:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of $1,356.16 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be $2,213.83. Please amend your report to clarify the discrepancy.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the contributor. In addition,

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any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Jan McBride

Jan McBride
Reports Analyst
Reports Analysis Division

24B

94039465052

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 3

FOR LINE NUMBER 23

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)

Cargill, Incorporated Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Mike Devine 8 East Broadstreet Columbus, OH 43215	Senate - Ohio Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/14/94	$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Committee to Elect Wayne Allard 611 Pennsylvania Ave. SE, Suite 168 Washington, DC 20003	CO District 4 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	8/03/94	$1,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dan Hamburg for Congress P. O. Box 155 Napa, CA 94559	CA Distict 1 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	8/26/94	$ 250.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Omann for Congress Committee P. O. Box 1022 St. Cloud, MN 56302	MN District 7 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	8/26/94	$2,500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sam Brownback for Congress P. O. Box 2008 Topeka, KS 66601	KS District 2 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/09/94	$1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
People for Ganske 5907 Grand Ave. Des Moines, IA 50312	IA District 4 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/09/94	$1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Committee for Sam Gibbons 4603 Wishart Blvd. Tampa, FL 33603	FL District 11 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/09/94	$1,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Latham for Congress P. O. Box 117 Orange City, IA 51041	IA District 5 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/09/94	$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Nussle for Congress P. O. Box 324 Manchester, IA 52057	IA District 2 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/09/94	$1,000.00

SUBTOTAL of Disbursements This Page (optional) $9,750.00

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

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

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NAME OF COMMITTEE (in Full)

Cargill, Incorporated Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Sanford Bishop for Congress PO Box 909 Columbus, GA 31902	GA District 2 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	5/24/94	500.00
Lehman for Congress Committee 2059 W. Bullard #324 Fresno, CA 93711	CA District 19 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/03/94	1,000.00
Omann for Congress Committee PO Box 1022 St. Cloud, MN 56302	MN District 7 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/10/94	1,000.00
Friends of Bill Emerson PO Box 822 Cape Girardeau, MO 63701	MO District 8 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/10/94	500.00
Friends of Jack Kingston PO Box 2133 Savannah, GA 31402	GA District 1 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/14/94	500.00
Walker '94 Committee PO Box 51 Millersville, PA 17551	PA District 16 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/29/94	500.00
Scott Klug for Congress Incorporated PO Box 5619 Madison, WI 53705	WI District 2 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/29/94	500.00
Wally Herger for Congress Committee PO Box 2223 Marysville, CA 95901	CA District 2 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/29/94	500.00
Tillie Fowler for Congress PO Box 380087 Jacksonville, FL 32205	FL District 4 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	6/29/94	500.00

SUBTOTAL of Disbursements This Page (optional) 5,500.00

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

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE 2 OF 2
	FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)
Cargill, Incorporated Political Action Committee

A. Full Name, Mailing Address and Zip Code Latham for Congress P.O. Box 117 Orange City, IA 51041	Purpose of Disbursement Iowa - District 5 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	Date (month, day, year) 10/14/94	Amount of Each Disbursement this Period 1,000.00
B. Full Name, Mailing Address and Zip Code Omann for Congress Committee P.O. Box 1022 St. Cloud, MN 56302	Purpose of Disbursement Minnesota - District 7 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	Date (month, day, year) 10/14/94	Amount of Each Disbursement this Period 2,000.00
C. Full Name, Mailing Address and Zip Code Friends of Bill Emerson P.O. Box 822 Cape Girardeau, MO 63701	Purpose of Disbursement Missouri - District 8 Disbursement for: [ ] Primary [X] General [ ] Other (specify)	Date (month, day, year) 10/14/94	Amount of Each Disbursement this Period 500.00
D. Full Name, Mailing Address and Zip Code Rod Grams for U.S. Senate Committee 2013 Second Avenue North - #B2 Anoka, MN 56303	Purpose of Disbursement Minnesota - Senate Disbursement for: [ ] Primary [X] General [ ] Other (specify)	Date (month, day, year) 10/14/94	Amount of Each Disbursement this Period 4,000.00
E. Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement this Period
F. Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement this Period
G. Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement this Period
H. Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement this Period
I. Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement this Period

SUBTOTAL of Disbursements This Page (optional).....	7,500.00
TOTAL This Period (last page this line number only).....	15,000.00

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