



October 15, 2004

Maureen Benitz
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00166355

Reference: Year-End Report (7/1/03 -12/31/03)

Dear Ms. Benitz

This letter is in response to your letter dated October 6, 2004 and the inquiries on two items. Following is our response to your inquiries:

-Schedule B transferring \$2000.00 to non-federal account committee: This transfer was to our state PAC account, California Citrus Mutual State PAC, to support state candidates. As per our conversation, the funds were not used for any other purpose, and it is our understanding that the transfer is considered legitimate and no further action is needed.

-Suntreat Packing & Shipping Co. contribution of \$1000.00: Suntreat Packing & Shipping Co. is a limited partnership (LP), and it was our belief that due to the LP status funds could be deposited in our federal PAC. After conversations with the commission and investigation on our part, we refunded the \$1000.00 to Suntreat Packing & Shipping on October 13, 2004, to be reflected in our Pre-General October 21 filing. This decision was based on the fact that the limited partnership is comprised of corporations and trusts and rather than peel through the layers to attribute to one individual, the decision was made to refund the entire amount.

If you have any further questions, I may be reached at 559-592-3790.

Cordially

Shirley Batchman
Treasurer
California Citrus Mutual PAC

RECEIVED
FEC MAIL
OPERATIONS CENTER

2004 OCT 18 A 11:01

BOARD OF
DIRECTORS

NICK HILL
Chairman

TOM AVINOFF
Vice Chairman

FRANCO BERNARDI
Vice Chairman

PHILIP LOHMEYER
Secretary/Treasurer

CAROLE ALPHONSO

DONN GARRISON

LEIGHTON CLARKSON

JOHN DEMBICKI

GAREN DILL

DAVE GILBERTSON

JOHN GRESH

KEVIN HOWARD

JIM MARDEROWSKI

MICHAEL DEARBORN

JOHN NEHRIG

DOUG PHILLIPS

DAVID PREEB

BOB RADYCK

DAVID ROBERTS

DAVE TUNLINGTON

BOB WAGNER

TONY WOLLERMAN

JOHN WOOD

007 1000

RECEIVED
FEC MAIL
RQ-2 OPERATIONS CENTER

2004 OCT 19 A 11:01



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 2004

COPY

Shirley Batchman, Treasurer
California Citrus Mutual Political Action Committee
512 N Kaweah Avenue
Exeter, CA 93221

Response Due Date:
November 5, 2004

Identification Number: C00166355

Reference: Year-End Report (7/1/03-12/31/03)

Dear Ms. Batchman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B of your report discloses a transfer(s) totaling \$2000.00 to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.6 and 106.7. Please provide further clarification regarding this transfer(s). The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

-Schedule A of your report discloses one or more contributions totaling \$1000.00 from "Suntreat Packing & Shipping Co," which appears to be a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

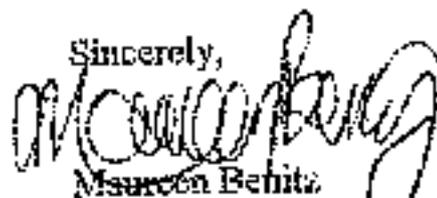
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1135.

Sincerely,



Msureen Behitz

Senior Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
	Delivery Confirmation™ Label <input type="checkbox"/>
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>Fedex</i>	Shipping Date <i>10-15-04</i>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>JEI</i> PREPARER	<i>10-18-04</i> DATE PREPARED