



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Randall T. Jones, Treasurer
National Council of Farmer Cooperatives
Political Action Committee (CO-OP/PAC)
50 F Street, NW, Suite 900
Washington, DC 20001

FEB 16 2000

Identification Number: C00002238

Reference: May Monthly Report (4/1/99-4/30/99)

Dear Mr. Jones:

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the

donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a 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 prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts 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) 694-1130.

Sincerely,

Debbie Chacona

Debbie Chacona
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A**ITEMIZED RECEIPTS**Use separate schedule(s)
for each category or the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 11(c)**Contributions From Other Political Committees (such as PACs)**

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)		Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
National Council of Farmer Cooperatives CO-OP/PAC		Agway, Inc.	4/8/99	\$3,000.00
Full Name, Mailing Address and ZIP Code Agway Inc. PAC P. O. Box 4899 Syracuse, NY 13221 Donald P. Cardarelli		Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date	\$ 3,000.00	
Full Name, Mailing Address and ZIP Code Dairy Farmers of America/DEPAC 3253 E. Chestnut Expressway Springfield, MO 65802		Dairy Farmers of America	4/8/99	\$5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
		Aggregate Year-to-Date	\$ 5,000.00	
Full Name, Mailing Address and ZIP Code Calcut Federal PAC P.O. Box 259 Bakersfield, CA 93302		Calcut, Ltd.	4/8/99	\$1,500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
		Aggregate Year-to-Date	\$ 1,500.00	
Full Name, Mailing Address and ZIP Code Sun-Maid Growers of California PAC 13525 S. Bethel Avenue Kingsburg, CA 93631		Sun-Maid Growers of California	4/8/99	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
		Aggregate Year-to-Date	\$ 1,000.00	
Full Name, Mailing Address and ZIP Code Diamond Walnut Growers PAC-Federal 1060 S. Diamond Street Stockton, CA 95205		Diamond Walnut Growers	4/8/99	\$1,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
		Aggregate Year-to-Date	\$ 1,000.00	
Full Name, Mailing Address and ZIP Code PEACH-PAC P.O. Box 7001 Lafayette, CA 94549		California Canning Peach Assn.	4/8/99	\$500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation		
		Aggregate Year-to-Date	\$ 500.00	

SUBTOTAL of Receipts This Page (optional)	\$ 12,000.00
TOTAL This Period (last page this line number only)	\$ 12,000.00

