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California Grape & Tree Fruit League Political Action Committee

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September 19, 1995

Neil Evans
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00721582

Reference: 1/1/93-6/30/93, 7/1/93-12/31/93, 1/1/94-3/31/94, 5/19/94-6/30/94 and
11/29/94-12/31/94

Dear Mr. Evans:

Pursuant to your telephone conversation with Laura Stephen of J. Richard Eichman, CPA, she has advised me that the procedure we have been using regarding reimbursement for joint fundraisers is incorrect. Ever since our PAC was formed in 1980, we have funded all joint fundraisers with State PAC funds and reimbursed the State PAC by a ratio factor from the the Federal PAC for the federal portion of the fundraiser. This is the first instance of any notification by the FEC or by Mr. Eichman's office that this is not the correct way to do this.

We have been informed by Laura that we should in the future fund all joint fundraisers from federal funds and reimburse the Federal PAC by a ratio factor from the State PAC for the state portion of the fundraiser. This will be reported on our FEC report on Schedule H2 and Schedule H3 on Line 18. Laura has also advised me that no amendments are necessary.

At this time I would also like to submit approval by the commission to use the attached computerized formats for the Schedule A & B.

I will assume that the above information is correct unless I hear from you.

Sincerely,

Herbert Kaprielian, Treasurer
California Grape & Tree Fruit League
Political Action Committee