



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Harvey Labko, Treasurer
Western Growers Association Political
Action Committee Federal
17620 Fitch Street
Irvine, CA 92714

NOV 22 2006

Identification Number: C00193979

Reference: Amended Mid-Year Report (1/01/99-6/30/99) dated 1/19/00

Dear Mr. Labko:

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 portions attached) discloses an apparent contribution(s) from 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 the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. 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. 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.

-The Commission notes the transfer out of the erroneously deposited funds to what appears to be your committee's non-federal account (pertinent portion attached). Please provide the date of the original deposit into the federal account and amend the appropriate report to disclose the receipt of these funds on a Schedule A supporting the appropriate line of the Detailed Summary Page.

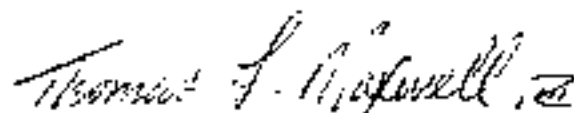
Although the Commission may take further legal action regarding these erroneously deposited funds, your prompt action in refunding this amount will be taken into consideration.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Please amend Schedule B supporting Line 23 by providing the office sought including state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

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)

I.D. NUMBER

WESTERN GROWERS POLITICAL ACTION COMMITTEE

C00193979

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Crown Hill Ranches 85810 Grapefruit Blvd Coachella CA 92236	OCCUPATION: GROWER	02/22/99	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Gray Eagle Group P.O. Box 2949 Yuma AZ 85364	Gray Eagle Group OCCUPATION: GROW/PACK	02/16/99	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Meyer, Robert L. P.O. Box 606 King City CA 93930	Meyer Tomatoe OCCUPATION:	02/22/99	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Clint Miller P.O. Box 399 Watsonville CA 95076-0399	Clint Miller Farms OCCUPATION: PARTNER	04/08/99	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Cindy Baker 3722 W. 15th Street Yuma AZ 85364	Gowan Co. OCCUPATION:	04/08/99	\$250.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	250.00	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$2,390.00
TOTAL THIS PERIOD (LAST PAGE THIS LINE NUMBER ONLY)			\$3,740.00

"OTHER"

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 29

SCHEDULE B

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)

WESTERN GROWERS POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Western Growers Pac - California 17620 Fitch Street Irvine, CA 92614	Erroneously deposited to Federal PAC Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	02/03/99	1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 1,000.00

TOTAL This Period (last page this line number only) 1,000.00

