



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 2000

Identification Number: C00193979

Reference: April Quarterly Report (1/01/00-3/31/00)

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.

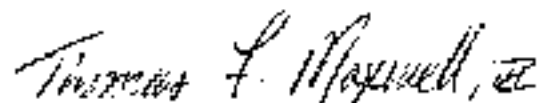
Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-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 address and 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  
C00193979

WESTERN GROWERS POLITICAL ACTION COMMITTEE

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Bob Grimm P.O. Box 715 Lamont CA 93241	Grimmway Farms OCCUPATION: PARTNER	02/07/00	\$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
John D'Arrigo 20412 Franciscan Way Salinas CA 93908	D'Arrigo Bros. Co Of Calif. OCCUPATION: GROWER	02/07/00	\$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
Crown Hill Ranches 85810 Grapefruit Blvd Coachella CA 92236	OCCUPATION: GROWER	02/07/00	\$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
Gray Eagle Group P.O. Box 2949 Yuma AZ 85364	Gray Eagle Group OCCUPATION: GROW/PACK	02/07/00	\$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
Mills Bros. Enterprises P.O. Box 642 Salinas CA 93902	Mills Bros. Enterprises OCCUPATION: FARMING	03/24/00	\$535.00
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$2,675.00
TOTAL THIS PERIOD (LAST PAGE THIS LINE NUMBER ONLY)			

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NAME OF COMMITTEE (IN FULL) WESTERN GROWERS POLITICAL ACTION COMMITTEE I.D. NUMBER C00193979

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Ray-Lee Company Partnership P.O. Box 9159 Bakersfield CA 93309	GROWERS	02/07/00	\$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
Jon Jessen 4259 W. County 12 Yuma AZ 85365	Gowan Co. PESTICIDES EXECUTIVE	02/07/00	\$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
Bontadelli Bros. 411 Altivo Ave Watsonville CA 95076	GROWER	02/07/00	\$500.00
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	500.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
S. H. Smith Farms P O Box 7 Turlock CA 95381	S. H. Smith Farms GROWER	02/07/00	\$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
John Gless 1441 Ravenswood Ln Riverside CA 92506	GROWER	02/25/00	\$535.00
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$2,640.00

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USE SEPERATE SCHEDULE(S) FOR EACH CATAGORY OF THE DETAILED SUMMARY PAGE

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FOR LINE NUMBER 11

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I.D. NUMBER  
**C00193979**

NAME OF COMMITTEE (IN FULL)  
**WESTERN GROWERS POLITICAL ACTION COMMITTEE**

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Tom Bengard Ranch P O Box 80090 Salinas, CA 90090	Tom Bengard Ranch	03/02/00	\$535.00
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	335.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: ( ) PRIMARY ( ) GENERAL ( ) OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	\$535.00
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$7,990.00
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