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**SWEENEY  
DAVIDIAN &  
GREENE LLP**  
ATTORNEYS AT LAW

8001 FOLSOM BOULEVARD, SUITE 101  
SACRAMENTO, CALIFORNIA 95829

TELEPHONE (916) 388-0170  
FACSIMILE (916) 388-0387

[www.sdgplan5m.com](http://www.sdgplan5m.com)

JAMES F. SWEENEY  
BEN DAVIDIAN  
STEPHEN J. GREENE, JR.  
STEPHEN R. MCCARTHEON, JR.  
BENJAMIN D. KINNE  
BRIAN T. HEDRETH

October 21, 2004

Via U.S. Mail

Mr. Cary Davidson  
Treasurer  
Employees of Northrop Grumman Political Action Committee  
520 S. Grand Ave., Suite 700  
Los Angeles, CA 90071

**Re: *Misidentified contribution to Committee for the Preservation of Capitalism***

Dear Cary:

This law firm represents the California Portland Cement Company Political Action Committee ("CPC-PAC"). During a recent review of contributions made and received by CPC-PAC we discovered that a contribution made by Employees of Northrop Grumman Political Action Committee ("ENGPAC") was erroneously reported by you as made to CPC-PAC. We believe the true identity of the recipient of your contribution is the Committee for the Preservation of Capitalism.

As a result of the misreported contribution, the Federal Election Commission ("FEC") Internet website displays CPC-PAC as the recipient of a contribution from ENGPAC. As you know, federal law prohibits separate segregated funds (*i.e.* company-sponsored PACs) from receiving contributions from outside a narrow classification of individuals, including other PACs.

After speaking with representatives of the FEC, we have determined that because no committee identification number was included on your report of the contribution, the FEC used the name on the recipient line to identify the recipient. As the attached document shows, you used the name "CPC-PAC" to report the contribution. Because California Portland Cement Company Political Action Committee is the legitimate holder of the "CPC-PAC" designation, the contribution was attributed as received by CPC-PAC, not the Committee for the Preservation of Capitalism.

RECEIVED  
FEDERAL ELECTION COMMISSION  
10/21/04 9:28 AM

**SWEENEY, DAVIDIAN & GREENE LLP**


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 Letter to Cary Davidson

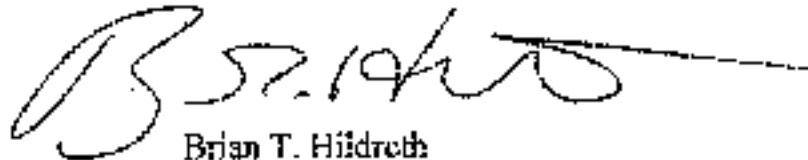
October 21, 2004

Page 2 of 2

According to FEC representatives, in order to remove CPC-PAC as the designated recipient of your contribution, your period report must be amended to show either the committee identification number or proper name identification for the Committee for the Preservation of Capitalism. It is critical that this be accomplished as soon as possible. If not, the FEC's website will continue to show what amounts to the making of an illegal contribution.

Thank you for your attention to this matter. Please feel free to contact me should you have any questions or require additional information.

Very Truly Yours,



Brian T. Hildreth

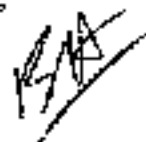
BTH:ndb

Enclosures

CC: Renee Benjamin, Esq.  
Corporate Counsel, California Portland Cement Company

Kristin Davis  
Reports Specialist, Federal Election Commission

*Cary,  
Have Jim  
call me to  
discuss.*



**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

|   |     |                                     |     |              |     |
|---|-----|-------------------------------------|-----|--------------|-----|
| Use separate schedule(s) for each category of the Detailed Summary Page |     | FOR LINE NUMBER: (Sheet only enter) |     | PAGE 120/127 |     |
| 21a   | 22  | 23                                  | 24  | 25           | 26  |
| 27  | 28a | 28b                                 | 28c | 29           | 30a |

Any information copied from such reports and statements may not be used 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)  
EMPLOYEES OF NORTHROP GRUMMAN CORPORATION PAC

|   |  |   |               |
|---|--|---|---------------|
| Full Name (Last, First, Middle Initial)<br>A. CPG PAC |  | Transaction ID: EXP: B 121841<br>Date of Disbursement<br>05 / 20 / 2008 |               |
| Mailing Address: P.O. BOX 22814                       |  | Amount of Each Disbursement this Period<br>1000.00                      |               |
| City<br>ALEXANDRIA                                    | State<br>VA  | Zip Code<br>22304   | Category Type |
| Purpose of Disbursement                               |  | Candidate Name  |               |
| Office Sought: House<br>Senate<br>President           | Disbursement For:<br>Primary General<br>Other (specify) <input type="checkbox"/> |   |               |
| State: District                                       |  |   |               |

|   |  |   |               |
|---|--|---|---------------|
| Full Name (Last, First, Middle Initial)<br>B. GRENshaw FOR CONGRESS             |  | Transaction ID: EXP: E 119388<br>Date of Disbursement<br>05 / 04 / 2008 |               |
| Mailing Address: 8223 NORTH WASHINGTON BLVD.                                    |  | Amount of Each Disbursement this Period<br>2000.00                      |               |
| City<br>ARLINGTON   | State<br>VA  | Zip Code<br>22201   | Category Type |
| Purpose of Disbursement   |  | Candidate Name<br>ANDER GRENshaw  |               |
| Office Sought: <input checked="" type="checkbox"/> House<br>Senate<br>President | Disbursement For:<br><input checked="" type="checkbox"/> Primary General<br>Other (specify) <input type="checkbox"/> |   |               |
| State: FL District: 4   |  |   |               |

|  |  |   |               |
|--|--|---|---------------|
| Full Name (Last, First, Middle Initial)<br>C. ERIC PAC |  | Transaction ID: EXP: B 119401<br>Date of Disbursement<br>05 / 08 / 2008 |               |
| Mailing Address: 203 PENNSYLVANIA AVE., SE             |  | Amount of Each Disbursement this Period<br>3000.00                      |               |
| City<br>WASHINGTON                                     | State<br>DC  | Zip Code<br>20003   | Category Type |
| Purpose of Disbursement                                |  | Candidate Name  |               |
| Office Sought: House<br>Senate<br>President            | Disbursement For:<br>Primary General<br>Other (specify) <input type="checkbox"/> |   |               |
| State: District  |  |   |               |

|   |         |
|---|---------|
| SUBTOTAL of Disbursements This Page (optional)      | 0000.00 |
| TOTAL This Period (next page this line number only) |         |

FEC Schedule B (Form 3X) Rev. 08/2003

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 checked="" type="checkbox"/> USPS First Class Mail                  | Postmarked<br>10-21-04                                |
| <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 type="checkbox"/> Overnight Delivery Service (Specify):             | Shipping Date   |
| <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                         |

*[Signature]*  
 PREPARER

(5/2004)

10-28-04  
 DATE PREPARED