

## California Cotton Growers Association

FEC MAIL CENTER

1785 N. Fine Avenue Fresno, CA 93727

2008 MAY 13 AM 9: 39

Telephone: 559 / 252-0684 Fax: 559 / 252-0551

May 5, 2008

Federal Election Commission Washington, D.C. 20463

Attention: Julie Fleming

**Reference: Year-End Report (7/01/07-12/31/07)** 

Identification Number: C00250464

Dear Ms. Fleming,

This letter is in response to your letter of April 9, 2008 requesting additional information on 2 items contained in the above referenced report.

Item #1. Schedule A of the above referenced report is mentioned and 8 specific contributions totaling \$3,800.00 are questioned as appearing to be contributions from corporations which are prohibited. Below are the explanations and/or clarifications for the 8 contributions in question.

- A. Teixeira & Sons is a partnership consisting of family members and engaged in farming. \$500.00 contribution properly reported
- B. Pereira Farms is a partnership consisting of family members and engaged in farming. \$500.00 contribution properly reported.
- C. Pucheu Bros is a partnership consisting of family members and engaged in farming. \$500.00 contribution properly reported.
- D. GCM Farms is a partnership consisting of family members and engaged in farming. \$500.00 contribution properly reported.

No corrective actions necessary on the above listed 4 contributions.

E. Palazzo Ranch is a corporation. The actual #300.00 contribution came from the Ralph Palazzo Trust, but was miss-reported as Palazzo Ranch on above referenced report. Contribution involved the purchase of raffle tickets for a PAC fundraiser. The raffle tickets were filled out as Palazzo Ranch, but the actual purchase or payment for the tickets was by check from Ralph Palazzo Trust and should have been reported that way. An amended report will be filed to correct this error. A copy of contribution check is attached together with raffle tickets referenced herein. (Attachment E)

- F. Borba Agribusiness Services is a dba of Agriquip, Inc. a corporation. Again the raffle tickets were filled out as Borba Agribusiness Services and reported as such on our report, which is in error. The raffle tickets were purchased by personal check from Mark M and Sharon K Borba, husband and wife and should have been reported accordingly. An amended report will be filed to correct this error. A copy of the contribution check is attached together with raffle tickets purchased. (Attachment F)
- G. Az Cal Management is a corporation. The \$500.00 contribution reported there was for purchase of raffle tickets which were marked as Az Cal Management and reported accordingly which was in error. The actual checks and/or contribution for purchase of said raffle tickets came from individual and/or partnership accounts which are all stockholders in Az Cal Management. Copies of the 6 checks received are attached and total \$500.00. They consist of \$100.00 MK Farms, \$100.00 James P. Sheely Farm Account, \$100.00 SFFII, \$100.00 SFFII, \$50.00 SFFII and \$50.00 SFFII. An amended report will be filed to correct this error in reporting. (Attachments G)
- H. Allbright Cotton is a corporation and as such this \$500.00 cannot be accepted. This contribution has been refunded upon discovery of this error. A copy of the refund check is attached and an amended report will be filed reflecting the same. A copy of the original contribution check is attached together with raffle tickets purchased with contribution that were clearly marked "No Corporate Checks". (Attachment H & J)

Item #2. Schedule B, line 23 of the above referenced report was questioned here. The report listed Primary 2009 candidate contributions, which is in error and an amended report will be filed to reflect correct election year candidate contributed.

Thank you for your inquiry. I believe the above explanations and clarifications together with the attachments referenced herein properly and honestly represent the facts set forth to correct the record.

Again, an amended report has been filed electronically to correct the mistakes in reporting as requested prior to compliance due date. If more information or further clarification is needed, please do not hesitate to contact me or Casey Creamer by mail or phone at (559) 252-0684.

Earl P. Williams

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President/CEO

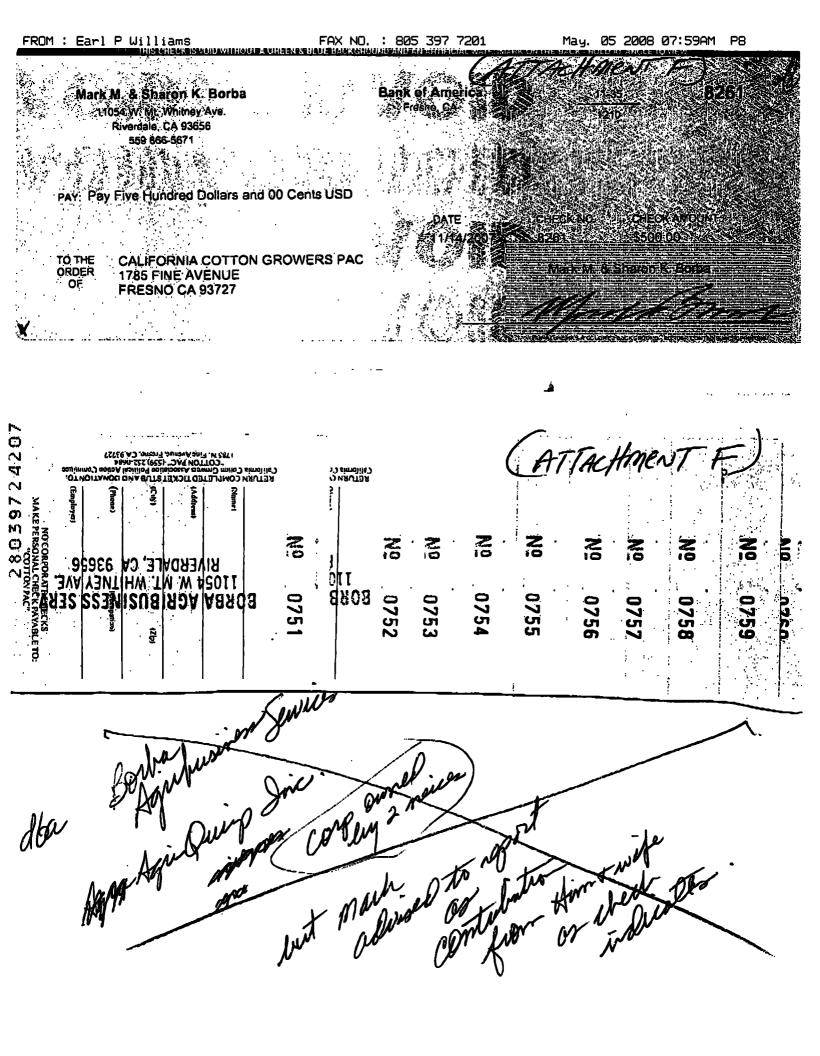
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FROM : Earl P Williams

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TO THE ORDER OF KILL

DATE 11/16/07

**AMOUNT** \$100.00\*\*

CCGA PAC Cotton PAC 1785 N. Fine Ave. Fresno, CA 93727

MK FARMS

11/16/07

3296 \$100.00

Ref.

**CCGA PAC** 

Description 2007 Cotton PAC Raffle **Amount** 100.00

(PARTIAL ATTACHMENT 6)

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NO CORPORATE CHECKS MAKE PERSONAL CHECK PAYABLE TO: COTTON PAC

Nº 0242

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FAX: STRENGOFE CA 8245

JAMES P. SHEELY-FARM ACCOUNT

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PARTIAL ATTACHMENT 6

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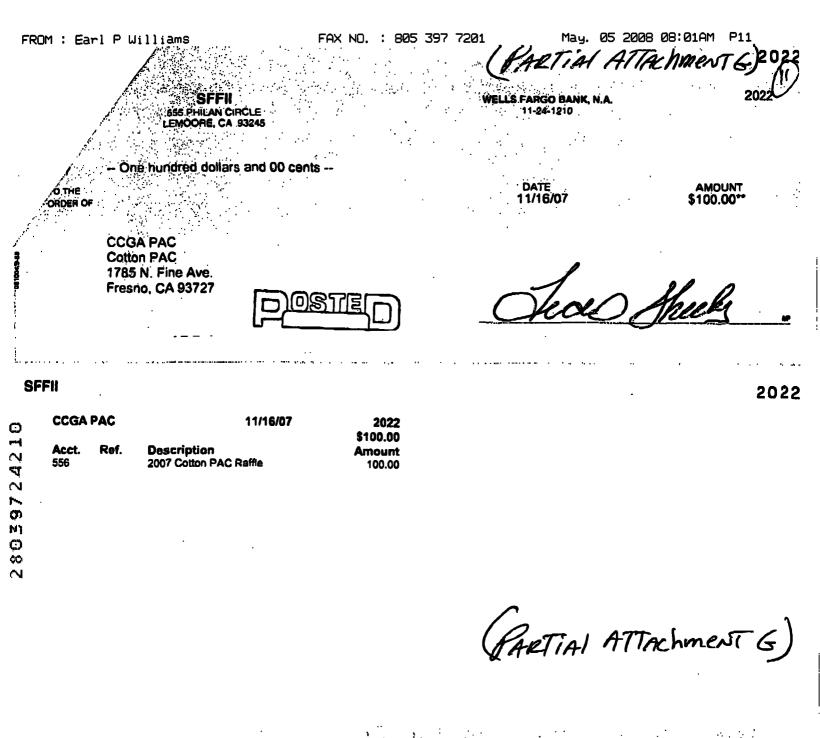
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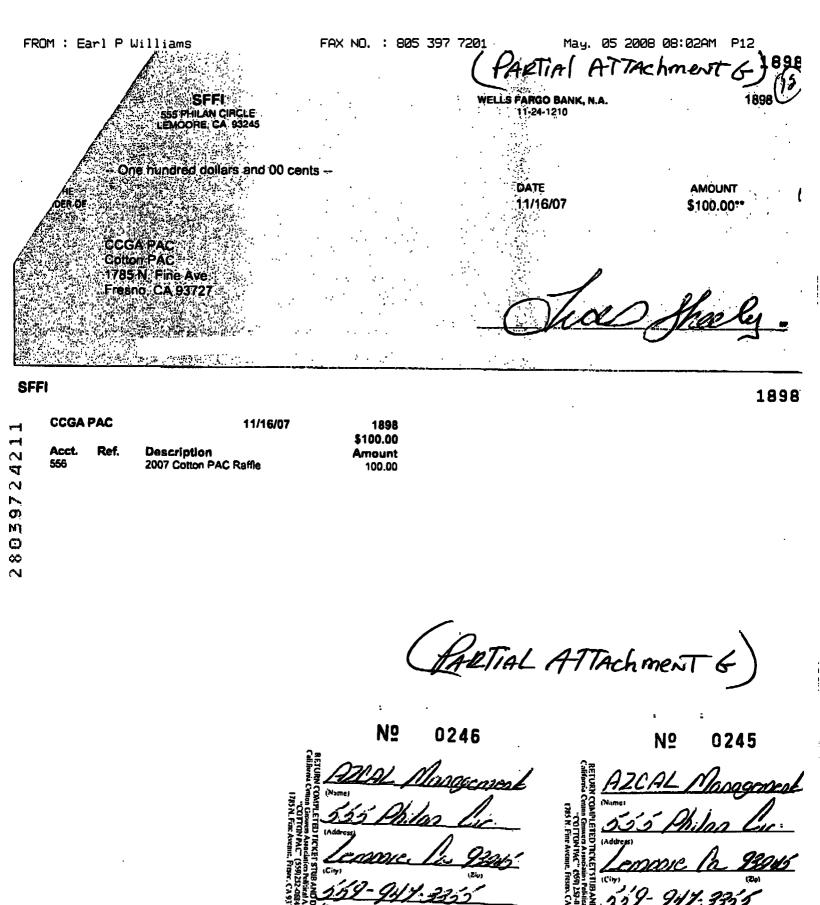


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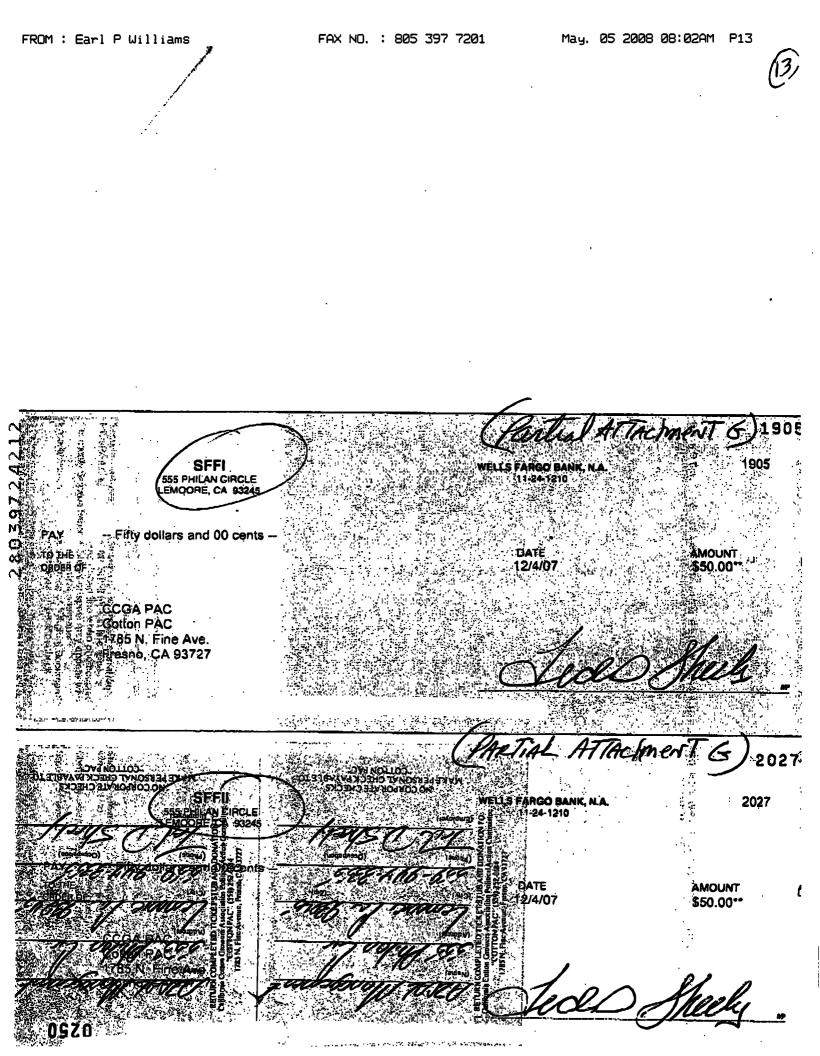
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(Employer)



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DATE

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ALLBRIGHT COTTON RESNO, CA 93722 PL:569.276-1664



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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING The FEC added this page to the end of this filing to indicate to	
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PREPARER (3/2005)	DATE PREPARED