FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Jeffrey L. Plathe, Treasurer
Southern Minnesota Sugar Cooperative
Political Action Committee
P.O. Box 500
Renville, MN 56284

DEC 23 1999

Identification Number: C00166348

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Plathe:

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 portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of $5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of $5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). 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 granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

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 reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

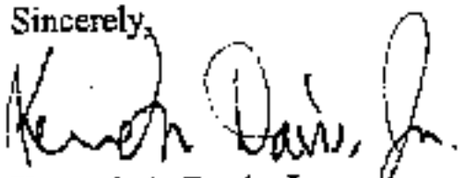
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free

number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

99034690450

SCHEDULE A **ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER 11a1

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)

Southern Minnesota Beet Sugar Cooperative PAC

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. 293200 JAMES HEBRINK AND CURTIS HEBRINK 88815 CO RD 21 RENVILLE MN 56284	SELF-EMPLOYED FARMING	01/01/99	273.77
	Aggregate Year-to-Date $ 273.77		
B. DALE STAMER 43596 CO RD 11 HECTOR MN 55342	SELF-EMPLOYED FARMING	01/01/99	5,772.99
	Aggregate Year-to-Date $ 5,772.99		
C. 311000 MICHAEL D MOLIEN RR 2 BOX 51 SACRED HEART MN 56285	SELF-EMPLOYED FARMING	01/01/99	230.69
	Aggregate Year-to-Date $ 230.69		
D. 317300 DUANE HULTGREN 11942 15TH AVE SW RAYMOND MN 56282	SELF-EMPLOYED FARMING	01/01/99	396.77
	Aggregate Year-to-Date $ 396.77		
E. 356600 RANDAL JANSSEN 6060 50TH AVE SE HAYWARD MN 56260	SELF-EMPLOYED FARMING	01/01/99	367.02
	Aggregate Year-to-Date $ 367.02		
F. 374800 SHANNON JOHNSON RT 2 BOX 312 HAZEL RUN MN 56241	SELF-EMPLOYED FARMING	01/01/99	202.46
	Aggregate Year-to-Date $ 202.46		
G. 405900 DAVID KARL 19199 65167 AVE BUFFALO LAKE MN 55314	SELF-EMPLOYED FARMING	01/01/99	335.55
	Aggregate Year-to-Date $ 335.55		

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SUBTOTAL of Receipts This Page (optional) 7,579.25

TOTAL This Period (last page this line number only) .....

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SCHEDULE B ... ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)

Southern Minnesota Beet Sugar Cooperative PAC

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. COMBEST FOR CONGRESS COMMITTEE P O BXO 10667 LUBBOCK TX 79408	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	5/21/99	500.00
B. CONDIT FOR CONGRESS 44 CANAL CENTER PLAZA SUITE 400 ALEXANDRIA VA 22314	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	4/20/99	500.00
C. FRIENDS OF KENT CONRAD PO BOX 812 BISMARCK ND 58502	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/04/99 5/26/99	1,000.00 1,500.00
D. COSTELLO FOR CONGRESS COMMITTEE P.O. BOX 8250 BELLEVILLE IL 62222	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	5/26/99	500.00
E. FRIENDS OF BUD CRAMER 38 IVY ST SE WASHINGTON DC 20003	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	5/04/99	500.00
F. CUBIN FOR CONGRESS P.O. BOX 4657 CASPER WY 82604	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/19/99	500.00
G. JIM DAVIS FOR CONGRESS P.O. BOX 2884 WASHINGTON DC 20013	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/19/99	500.00
H. DEMOCRATIC CONGRESSIONAL CAMP COMM ATTN: KATE WALTON 430 S CAPITOL ST SE WASHINGTON DC 20003	Purpose of Disbursement Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/30/99	1,000.00
I. DIAZ-BALART FOR CONGRESS 4451 BROOKFIELD CORPORATE DRIVE SUITE 200 CHANTILLY VA 20151-1652	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	4/13/99	500.00

SUBTOTAL of Disbursements This Page (optional) 7,000.00

TOTAL This Period (last page this line number only)

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (In Full)

SOUTHERN MINNESOTA BEET SUGAR COOPERATIVE PAC

Name, Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. EVA CLAYTON FOR CONGRESS P.O. BOX 2884 WASHINGTON DC 20013	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/19/98	500
B. COBLE FOR CONGRESS 4451 BROOKFIELD CORP DR SUITE 200 CHANTILLY VA 20151-1652	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	2/20/98	500
C. FRIENDS OF KENT CONRAD 110 S E BROAD ST FALLS CHURCH VA 22046	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/04/98	1,000
D. COSTELLO FOR CONGRESS COMMITTEE P.O. BOX 8250 BELLEVILLE IL 62222	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	2/20/98	500
E. FRIENDS OF BUD CRAMER 38 LUY ST SE WASHINGTON DC 20003	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/02/98	500
F. CRAPO FOR U S SENATE ATTN ED HAMAL 425 2ND ST NE WASHINGTON DC 20002	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/04/98	1,000
G. CUBIN FOR CONGRESS P.O. BOX 4657 CASPER WY 82604	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/19/98	500
H. PEOPLE SUPPORTING TOM DASCHLE P O BOX 1634 SIOUX FALLS SD 57101	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/13/98	1,000
I. JIM DAVIS FOR CONGRESS P.O. BOX 2884 WASHINGTON DC 20013	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	2/20/98	500

SUBTOTAL of Disbursements This Page (optional) 6,000.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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NAME OF COMMITTEE (In Full)
SOUTHERN MINNESOTA BEET SUGAR COOPERATIVE PAC

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. BALDACCI FOR CONGRESS P.O. BOX 523024 SPRINGFIELD VA 22152	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	10/23/97	500
B. BARCIA FOR CONGRESS P.O. BOX 28238 WASHINGTON DC 20038	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	10/23/97	500
C. BEREUTER FOR CONGRESS COMMITTEE P.O. BOX 82687 LINCOLN NE 68501	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	11/18/97	500
D. BOSWELL FOR CONGRESS 236 MASSACHUSETTS AVE NE STE 206 WASHINGTON DC 20002	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	11/18/97	500
E. DAVE CAMP FOR CONGRESS GWENDOLA D LANG, TREASURER 135 ASHMAN MIDLAND, MI 48640	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	9/12/97	500
F. CONDIT FOR CONGRESS LANCE H OLSON, TREASURER 920 13TH ST MODESTO CA 95354	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	10/23/97	500
G. FRIENDS OF KENT CONRAD P.O. BOX 58502 BISMARK ND 58502	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	12/03/97	1,000
H. PEOPLE SUPPORTING TOM DASCHLE LOU ROTHENBUEHLER TREAS P O BOX 1655 SIOUX FALLS SD 57101	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	11/18/97	500
I. FRIENDS OF FARR 555 NEW JERSEY AVE NW SUITE 201 WASHINGTON DC 20001	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	10/23/97	500

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SUBTOTAL of Disbursements This Page (optional) 5,000.00

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SCHEDULE B — **ITEMIZED DISBURSEMENTS**

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FOR LINE NUMBER 22

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NAME OF COMMITTEE (In Full)
SOUTHERN MINNESOTA BEET SUGAR COOPERATIVE PAC

	Name and Address	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Fu	CITIZENS FOR BUNNING MRS OTEKA BRAB, TREASURER 6703 FOXCROFT RD PROSPECT KY 40059	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	5/22/97	500
B. Fu	DAVE CAMP FOR CONGRESS GWENDOLA D LANG, TREASURER 135 ASHMAN MIDLAND, MI 48640	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	4/02/97	500
C. Pr	CAMPBELL VICTORY FUND P.O. BOX 480166 DENVER CO 80248-0166	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/05/97	500
D. P	CHENOWETH FOR CONGRESS P.O. BOX 897 BOISE ID 83701	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	4/02/97	500
E. F	EVA CLAYTON FOR CONGRESS 400 N 5TH ST SUITE 106 GREENVILLE NC 27834	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	6/02/97	500
F. P	FRIENDS OF KENT CONRAD P.O. BOX 58502 BISMARK ND 58502	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	6/02/97	1,000
G. P	CRAIG FOR U.S. SENATE 1996 GENERAL ELECTION DEBT P.O. BOX 2754 BOISE ID 83701	SENATE CANDIDATE Disbursement for: [ ] Primary [Y] General [ ] Other (specify)	2/26/97	1,000
H. C	COVERDELL GOOD GOVERNMENT COMMITTEE 3091 MAPLE DR SUITE 206 ATLANTA GA 30305	SENATE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	4/02/97	1,000
I. Fr	FRIENDS OF BUD CRAMER 38 1VY ST SE WASHINGTON DC 20003	HOUSE CANDIDATE Disbursement for: [X] Primary [ ] General [ ] Other (specify)	3/05/97	500

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SUBTOTAL of Disbursements This Page (optional) 6,000.00

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