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November 26, 2018

Federal Election Commission  
1050 1<sup>st</sup> Street, NE  
Washington, DC 20463

Attn.: Andrea Chamorro, Campaign Finance Analyst, Reports Analysis Division

Re: Western Growers PAC (#C00193979)  
April Quarterly Report (1/1/2018 – 3/31/2018)

Dear Ms. Chamorro,

I am responding to a letter dated October 29, 2018 concerning contributions we made to two candidates that exceeded the limit for their election cycle. The reason for this mistake was due to a clerical oversight by us of the respective candidates' election cycle.

Accordingly, we have requested refunds from both candidates' campaign offices, and expect to receive the refund checks within the next week. Please see the attached email correspondence indicating confirmation of such. After receipt of the funds we will properly record these transactions in the next reporting period, which I believe will be 12/31/18.

Please accept our apologies for this oversight. If you have any questions or need further information, please do not hesitate to contact me at 949-885-2383

Sincerely,

A handwritten signature in black ink, appearing to read "Ward Kennedy".

Ward Kennedy  
Treasurer  
Western Growers PAC

Attachment 1 – Senator Heinrich email confirmation  
Attachment 2 – Senator Stabenow email confirmation

## Ward Kennedy

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**From:** Dave Puglia  
**Sent:** Tuesday, November 20, 2018 10:30 AM  
**To:** Steve Fitzer  
**Cc:** Tonya Fulkerson; Ward Kennedy  
**Subject:** RE: Western Growers PAC contribution to Sen. Heinrich

Hi Steve.

Thanks for your fast reply and assistance, and please also accept my apology for our error in reporting the contribution. We are making internal changes now to avoid such missteps in the future.

I will certainly advocate that our PAC Board authorize a contribution to Lobo PAC at the earliest opportunity.

Please make the refund check out to Western Growers PAC-Federal and mail as follows:

Western Growers  
ATTN: Ward Kennedy  
15525 Sand Canyon Ave.  
Irvine, CA 92618

Thanks again, and happy Thanksgiving.

**Dave Puglia**  
Executive Vice President  
949.885.2252

**Western Growers**  
15525 Sand Canyon Ave | Irvine | CA | 92618

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**From:** Steve Fitzer <steve.fitzer@martinheinrich.com>  
**Sent:** Tuesday, November 20, 2018 10:16 AM  
**To:** Dave Puglia <DPuglia@WGA.com>  
**Cc:** Tonya Fulkerson <tonya@fkandcompany.com>  
**Subject:** Western Growers PAC contribution to Sen. Heinrich

Dave,

Tonya forwarded your email to me and I wanted to get back to you. After reviewing the records and talking with our compliance team, we agree that the easiest thing would be for us to issue a refund, which we will do in our next check run at the end of the month. Please let me know how you would like the check made out and where you would like it sent.

We appreciate all of the support for Senator Heinrich, it means a lot. If you would consider making a contribution for \$1,000 to his leadership PAC, Lobo PAC, that would be great to help us in our ongoing efforts.

Have a wonderful Thanksgiving and I look forward to hearing back from you on where the check should be sent and how you want it make out.

Steve Fitzer

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Steve Fitzer, Finance Director  
Martin Heinrich for Senate  
Follow us on [Facebook](#) & [Twitter](#)  
Visit us at [www.MartinHeinrich.com](http://www.MartinHeinrich.com)  
(c) (505) 270-4079

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## Ward Kennedy

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**From:** Dave Puglia  
**Sent:** Monday, November 19, 2018 11:52 AM  
**To:** Ellie Darnell; Shannon Salk  
**Cc:** Guy Selden; Ward Kennedy  
**Subject:** RE: Western Growers PAC: Notice from FEC

That was my read as well, unfortunately. Again, our apologies for this mistake. Trust that we are in the process of changing our internal processes to avoid such errors in the future.

**From:** Ellie Darnell <edarnell@stabenowforsenate.com>  
**Sent:** Monday, November 19, 2018 11:48 AM  
**To:** Shannon Salk <shannon@theseldengroup.com>  
**Cc:** Dave Puglia <DPuglia@WGA.com>; Guy Selden <seldengu@gmail.com>  
**Subject:** Re: Western Growers PAC: Notice from FEC

Unfortunately the amendment would have had to be done within the 60 day period. Since we have missed that period - I will issue a refund.

On Mon, Nov 19, 2018 at 2:07 PM Shannon Salk <[shannon@theseldengroup.com](mailto:shannon@theseldengroup.com)> wrote:

Hi Dave-

Thanks again for reaching out. Please meet our compliance director, Ellie Darnell. Ellie- Western Growers accidentally misfiled their contributions to our campaign (please see attached letter from the FEC). Can they file an amendment on their end so as not to request a refund from us? Thanks!

Best,  
Shannon

----- Forwarded message -----

**From:** Dave Puglia <[DPuglia@wga.com](mailto:DPuglia@wga.com)>  
**Date:** Mon, Nov 19, 2018 at 1:25 PM  
**Subject:** RE: Western Growers PAC: Notice from FEC  
**To:** [seldengu@gmail.com](mailto:seldengu@gmail.com) <[seldengu@gmail.com](mailto:seldengu@gmail.com)>

Good morning. Please see attached. It is our understanding that due to our error in reporting all of our PAC's contributions to Sen. Stabenow's campaign as "primary" (and for the wrong year), we are required now to request a refund of \$2,500 and to provide notice to the FEC of said request.

If you and/or your committee's treasurer believe this can be cured without a refund, please let me know as soon as possible. If not, please confirm that a refund will be issued as soon as possible.

We regret our mistakes in properly reporting our PAC contributions to Sen. Stabenow's committee and we apologize for the difficulty this has caused.

**Dave Puglia**

Executive Vice President

949.885.2252

**Western Growers**

15525 Sand Canyon Ave | Irvine | CA | 92618

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Best,  
Shannon M. Salk  
**The Selden Group**  
328 Massachusetts Avenue, N.E.  
Washington, D.C. 20002  
(248) 459-7219

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Ellie Darnell  
Compliance Director

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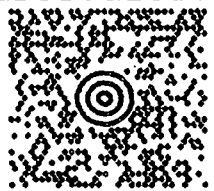
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TONI CHAPMAN  
949-885-2384  
WESTERN GROWERS ASSOC  
15525 SAND CANYON  
IRVINE CA 92618

0.0 LBS LTR 1 OF 1

SHIP TO:  
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1050 1ST STREET NE  
WASHINGTON DC 20002-4694



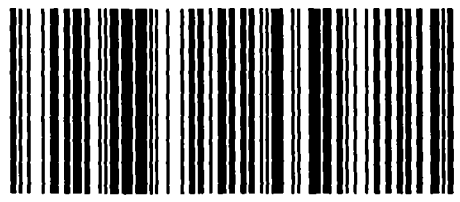
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