FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Richard J. Hudjera, Treasurer
IMC Global Operations Inc. Political
Action Committee
2100 Sanders Road
Northbrook, IL 60062

DEC 23 1998

Identification Number: C00225367

Reference: April Quarterly (1/1/98-3/31/98) and October Quarterly (7/1/98-9/30/98) Reports

Dear Mr. Hudjera:

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 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.

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. My local number is (202) 694-1130.

Sincerely,

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

8033702878

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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FOR LINE NUMBER 23

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)
IMC GLOBAL OPERATIONS INC. - POLITICAL ACTIONCOMMITTEE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. WASHINGTON STATE PAC P.O. BOX 1862 SPOKAN, WA 99210	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-2-98	$ 500.00
B. CONGRESSMAN MERRILL COOK R-UT-02 COOK FOR CONGRESS 365 STATE ST SALT LAKE CITY, UT 84111	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$ 500.00
C. SENATOR BOB GRAHAM [D-FL] FRIENDS OF BOB GRAHAM 233 CONSTITUTION AVE, NE WASHINGTON, DC 20002	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$2,000.00
D. CONGRESSMAN MIKE BILIRAKIS [R-FL-09] MIKE BILIRAKIS FOR CONGRESS PO BOX 1077 TARPON SPRINGS, FL 34688	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	500.00
E. CONGRESSWOMAN JENNIFER DUNN [R-WA-08] FRIENDS OF JENNIFER DUNN PO BOX 40110 BELLEVUE, WA 98015	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$ 500.00
F. CONGRESSMAN EARL POMEROY [D-ND-AT LARGE EARL POMEROY FOR CONGRESS PO BOX 75214 WASHINGTON, DC 20013-5214	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$1,000.00
G. CONGRESSMAN CHARLES W. STENHOLM [D-TX-17 STENHOLM FOR CONGRESS COMMITTEE 4400BUFFALO GAP RD. NO. 0400 ABILENE, TX 79606	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$ 500.00
H. CANDIDATE LEE TERRY [R-NE-02] LEE TERRY FOR CONGRESS 1212 NORTH VERNON ST. ARLINGTON, VA 22201	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$ 500.00
I. CONGRESSMAN JOE BARTON[R-TX-6] CONGRESSMAN JOE BARTON COMMITTEE PO BOX 1444 ENNIS, TX 75120	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7-6-98	$ 500.00

SUBTOTAL of Disbursements This Page (optional) $6,500.00

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

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SCHEDULE B — ITEMIZED DISBURSEMENTS

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IMC GLOBAL OPERATIONS INC. POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Senator Charles E. Grassley (R-IA) The Grassley Committee P.O. Box 1000 Des Moines, IA 50306	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	1-7-98	1,000.00
B. Congressman Tom Latham (R-IA-05) Latham for Congress Committee P.O. Box 174 Sioux City, IA 51102-0174	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	1,000.00
C. Congressman Mark Foley (R-FL-16) Friends of Foley P.O. Box 30505 Palm Beach Gardens, FL 33420	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	500.00
D. Senator Bob Graham (D-FL) Friends of Bob Graham 233 Constitution Ave., NE Washington, D.C. 20002	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	1,000.00
E. Senator Richard Shelby (R-AL) Shelby for US Senate P.O. Box 1091 Tuscaloosa, AL 35403	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	2,000.00
F. Senator Richard G. Lugar (R-IN) Friends of Dick Lugar P.O. Box 55952 Indianapolis, IN 46205	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	1,000.00
G. Congresswoman Barbara Cubin (R-WY-at large) Cubin for Congress P.O. Box 4657 Casper, WY 82604	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	500.00
H. Congressman Billy Tauzin (R-LA-03) Billy Tauzin Committee P.O. Box 1407 Thibodaux, LA 70302	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)	2-26-98	1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 8,000.00

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NAME OF COMMITTEE (In Full)

INC GLOBAL OPERATIONS INC. - POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: Primary / General / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Congressman Charles Canady (R-FL) P.O. Box 6158 Lakeland, FL 33807	Contribution Disbursement for: Primary [ ] General [X]	8-15-97	1000.00
Congressman Mark Foley (R-FL) Friends of Foley PO Box 30505 Palm Beach Gardens FL 33420	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	500.00
Senator Bob Graham (D-FL) Friends of Bob Graham 233 Constitution Avenue, NE Washington, DC 20002	Contribution Disbursement for: Primary [ ] General [X]	8-15-97	2000.00
Congressman Chris John (D-LA) Chris John for Congress PO Box 971 Crowley, LA 70526	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	500.00
Congressman William Jefferson (D-LA) Jefferson Committee P.O. Box 77137 Washington DC 20031	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	1000.00
Congressman Ray LaHood (R-IL) Friends of Ray LaHood 3311 N. Sterling, Suite 10 Peoria, IL 61604	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	1000.00
Congressman John Mica (R-FL) Mica for Congress PO Box 161546 Casselberry, FL 32718-1546	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	500.00
Congressman Donald Manzullo (R-IL) Manzullo for Congress PO Box 7783 Rockford, IL 61126	Contribution Disbursement for: Primary [X] General [ ]	8-15-97	500.00
Senator Harry Reid (D-NV) Friends for HarryReid 245 Second Street, NE Suite 300 Washington, DC 20002	Contribution Disbursement for: Primary [ ] General [X]	8-15-97	2000.00

SUBTOTAL of Disbursements This Page (optional) 9000.00

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INC GLOBAL INC. POLITICAL ACTION COMMITTEE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Mike Bilirakis for Congress c/o Tucker & Wahlquist 1350 I Street, N.W. #870 Washington, D.C. 20005	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		500.00
B. Friends of Clay Shaw PO Box 2188 Fort Lauderdale, FL 33303	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		500.00
C. Weller for Congress 4451 Brookfield Corporate Drive #200 Chantilly, VA 22021	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		500.00
D. Manzullo for Congress P.O. Box 25026 Washington, D.C. 20007	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		500.00
E. Latham for Congress 4810 46th Street Sioux City, IA 51108	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		500.00 AOB
F. Friends of Bob Graham 236 Massachusetts Avenue, N.E. Suite 202 Washington, D.C. 20002	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		2,000.00
G. Crapo for Congress 106 North 6th Street Boise, Idaho 83702	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		1,000.00
H. A Lot of People Supporting Jeff Bingaman	Debt Retire - 1994 General election Disbursement for: [ ] Primary [ ] General [X] Other (specify) SEE ABOVE		1,000.00
I. Zimmer for Senate P.O. Box 6888 Lawrenceville, NJ 08648	Contribution Disbursement for: [ ] Primary [X] General [ ] Other (specify)		1,000.00

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Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. TOM LATHAM TOM LATHAM FOR CONGRESS 4810 46TH STREET SIOUX CITY, IA 51108	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/11/95	500.00
B. BLANCHE LAMBERT LINCOLN FRIENDS OF BLANCHE LAMBERT LINCOLN P.O. BOX 523024 SPRINGFIELD, VA 20903	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/11/95	500.00
C. KAREN THURMAN KAREN THURMAN FOR CONGRESS P.O. BOX 5058 IVERNESS, FL 34450	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/11/95	500.00
D. BUD CRAMER BUD CRAMER FOR CONGRESS P.O. BOX 2621 HUNTSVILLE, AL 35804	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/11/95	500.00
E. STEVE SCHIFF STEVE SCHIFF FOR CONGRESS P.O. BOX 25185 ALBUQUERQUE, NM 87125	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	7/11/95	500.00 AB
F. BOB GRAHAM FRIENDS OF BOB GRAHAM P.O. BOX 11307 TALLAHASSEE, FL 32302	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	8/16/95	1000.00
G. JOHN PORTER PORTER FOR CONGRESS COMMITTEE P.O. BOX 7126 DEERFIELD, IL 60015	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	9/13/95	1000.00
H. PAT ROBERTS PAT ROBERTS FOR CONGRESS	CONTRIBUTION Disbursement for: [ ] Primary [X] General [ ] Other (specify)	11/2/95	1000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only) 5,500.00

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