



RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

J.P. O'Donnell, Treasurer
Conagra Foods Good Government Association
One Conagra Drive
Omaha, NE 68102

SEP 04 2002

Identification Number: C00087874

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Treasurer:

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:

-Line 23 of the Detailed Summary Page of your report discloses a total of \$23,000 in contributions to federal candidates/committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$24,000. Please amend your report to clarify the discrepancy.

-The totals listed on Lines 6(c), 7, 11(a)(iii), 11(d), 17, 19, 20, 23, 30 and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is

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defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

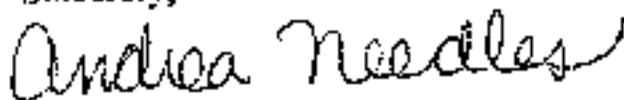
If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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 response or 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Andrea Needles

Senior Reports Analyst

Reports Analysis Division

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

 FOR LINE NUMBER:
 (check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
				<input type="checkbox"/> 29

 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)

ConAgra Foods Good Government Association

Full Name (Last, First, Middle Initial)

A. Friends Of Ray Lahood

 Mailing Address
 4451 Brookfield Corporate Dr. Suite 200
 City State Zip Code
 Chantilly VA 22021-1652

Purpose of Disbursement

 Candidate Name Category/
 Type

 Office Sought: House Disbursement For: 2002
 Senate Primary General
 President Other (Specify) □

State: IL District: 18

Full Name (Last, First, Middle Initial)

B. Peterson For Congress

 Mailing Address
 P.O. Box 285
 City State Zip Code
 Detroit Lakes MN 56502-

Purpose of Disbursement

 Candidate Name Category/
 Type

 Office Sought: House Disbursement For: 2002
 Senate Primary General
 President Other (Specify) □

State: MN District: 07

Full Name (Last, First, Middle Initial)

C. Allard For Senate

 Mailing Address
 507 Capitol Court Nw Ste 100
 City State Zip Code
 Washington DC 20002-

Purpose of Disbursement

 Candidate Name Category/
 Type

 Office Sought: House Disbursement For: 2002
 Senate Primary General
 President Other (Specify) □

State: CO District:

Date of Disbursement

06/14/2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: 7143

Date of Disbursement

06/14/2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: 7144

Date of Disbursement

06/14/2002

Amount of Each Disbursement this Period

1000.00

Transaction ID: 7145

SUBTOTAL of Disbursements This Page (optional)

3000.00

TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

 FOR LINE NUMBER:
 (check only one) PAGE 507 / 532
 21b 22 23 24 25
 26 27 28a 28b 28c 29

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 NAME OF COMMITTEE (In Full)
 ConAgra Foods Good Government Association

Full Name (Last, First, Middle Initial)

A. Altard For Senate

Date of Disbursement

07 09 2001

Mailing Address

507 Capitol Court Ne Ste 100

City Washington State DC Zip Code 20002-

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement

Candidate Name

 Category/
Type

 Office Sought House Disbursement For: 2002
 Senate X Primary General
 President Other (specify) □

Transaction ID: 5515

Full Name (Last, First, Middle Initial)

B. Boyd For Congress

Date of Disbursement

07 09 2001

Mailing Address

227 Massachusetts Ave. Ne

City Washington State DC Zip Code 20002-

Amount of Each Disbursement this Period

500.00

Purpose of Disbursement

Candidate Name

 Category/
Type

 Office Sought X House Disbursement For: 2002
 Senate X Primary General
 President Other (specify) □

Transaction ID: 5516

Full Name (Last, First, Middle Initial)

C. Jeff Flake For Congress

Date of Disbursement

07 09 2001

Mailing Address

4222 East Molten Rd. #19

City Mesa State AZ Zip Code 85205-

Amount of Each Disbursement this Period

500.00

Purpose of Disbursement

Candidate Name

 Category/
Type

 Office Sought X House Disbursement For: 2002
 Senate X Primary General
 President Other (specify) □

Transaction ID: 5517

SUBTOTAL of Disbursements this Page (optional)

2000.00

TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

 Use separate schedules
 for each category or the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c

 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)
 CONAGRA INC GOOD GOVERNMENT ASSOC.

Full Name (Last, First, Middle Initial)

A. ALLARD FOR SENATE

 Mailing Address
 507 CAPITOL COURT NE STE 100

 City State Zip Code
 WASHINGTON DC 20002

 Purpose of Disbursement
 2002 PRIMARY ELECTION

 Candidate Name
 WAYNE ALLARD

 Category/
Type

24K

 Office Sought: House Disbursement For: 2002
 Senate X Primary General
 President Other (specify)

State: CO District:

Date of Disbursement

03 05 2001

Amount of Each Disbursement this Period

1000.00

Transaction ID: B000854S000010L23

Full Name (Last, First, Middle Initial)

B. ALLARD FOR SENATE

 Mailing Address
 507 CAPITOL COURT NE STE 100

 City State Zip Code
 WASHINGTON DC 20002

 Purpose of Disbursement
 2002 PRIMARY ELECTION

 Candidate Name
 WAYNE ALLARD

 Category/
Type

24K

 Office Sought: House Disbursement For: 2002
 Senate X Primary General
 President Other (specify)

State: CO District:

Date of Disbursement

05 21 2001

Amount of Each Disbursement this Period

2000.00

Transaction ID: B000861S000001L23

Full Name (Last, First, Middle Initial)

C. AMERICAN MEAT INSTITUTE (AMI) PAC

 Mailing Address
 BOX 3558

 City State Zip Code
 WASHINGTON DC 20007

Date of Disbursement

02 15 2001

Amount of Each Disbursement this Period

5000.00

 Purpose of Disbursement
 2001 PRIMARY ELECTION

Candidate Name

 Category/
Type

24K

 Office Sought: House Disbursement For: 2001
 Senate X Primary General
 President Other (specify)

State: District:

Transaction ID: B000861S000002L23

SUBTOTAL of Disbursements This Page (optional) ►

5000.00

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

SCHEDULE B**ITEMIZED DISBURSEMENTS**

Line item(s) to be deducted from the amount of cash or cash equivalent deposited by the filer during the reporting period.	Page 5 of 23
	FILER LINE NUMBER 23

All information contained herein is subject to audit or review by the Office of Legal Counsel, OLC, or the Office of Inspector General, OIG, prior to or subsequent to audit or review of this committee's financial reports.

NAME OF COMMITTEE (in full)

CONAGRA INC GOOD GOVERNMENT PAC

a. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement WATER STANDARD C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	Date received day, year	Amount of Cash disbursement (in dollars)
		Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other:	Account of Cash disbursement (in dollars)
b. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 1,000.00
c. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
d. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
e. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
f. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
g. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
h. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
i. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
j. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
k. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
l. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement C. R. REEDER 1000 F STREET NW, SUITE 100 WASHINGTON, DC 20004	08/15/99 day, year	Amount of Cash disbursement (in dollars) 600.00
TOTAL AMOUNT OF DISBURSEMENTS MADE DURING REPORTING PERIOD			3,600.00

22037722385

125 126 127 128 129 130 131 132 133