



OCCIDENTAL PETROLEUM CORPORATION POLITICAL ACTION COMMITTEE
A MULTICANDIDATE COMMITTEE

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2010 JUL 14 AM 11:29

10889 WILSHIRE BOULEVARD, LOS ANGELES, CALIFORNIA 90024

July 9, 2010

Christopher J. Morse
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Reference: Corrections to Occidental Petroleum Corporation Political Action Committee
Monthly Report

Identification Number: C00083857

Mr. Christopher J. Morse:

Per the FEC letter dated June 30, 2010, in reference to the June report for Occidental Petroleum Corporation Political Action Committee (see attached letter), I am writing to provide the Commission with the additional information requested.

Issue: Schedule B disclosure of a contribution that exceeded the applicable contribution limit. Grassley Committee Inc. Primary contribution, dated 5/26/10, in the amount of \$1,000.

Action: OXYPAC inadvertently made a contribution to the Grassley Committee which exceeded the permitted limit. Therefore, OXYPAC was refunded \$1,000 (see copy of attached check) and will be reflected on the August Monthly Report.

Issue: Incorrect designation on OXYPAC's October 2008 Monthly Report. Grassley Committee Inc. 2008 Primary contribution, dated 9/25/08, in the amount of \$5,000.

Action: Due to a clerical error, above mentioned contribution was incorrectly designated to the 2008 Primary election (as noted in your letter, Senator Grassley did not participate in a Primary election in 2008). OXYPAC has amended its October 2008 Report to reflect that the contribution was for the 2010 election rather than the 2008 election. Specifically, the contribution for Grassley Committee Inc. for \$5,000 was removed and two correct contributions, one for \$4,000 for the 2010 Primary and one for \$1,000 for the 2010 General, were added.

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Issue: Contributions made after the 2010 Primary election date. Two separate contributions were made to the Portman for Senate Committee 2010 Primary contributions, dated 5/07/10, in the amount of \$1,000 each. However, the Ohio Primary was on 5/04/10.

Action: Since the PAC contribution checks were not drafted until 5/07/10 and the primary election date was 5/04/10, the contributions have been re-designated for the general election, and OXYPAC has reflected this change on its June 2010 Monthly Report.

Note: OXYPAC made a 2010 General Election contribution of \$5,000 to the Portman for Senate Committee on June 15, 2010. Since each of the Primary contributions for Portman for Senate Committee have been re-designated to the General election, this would result in a contribution over the allowable limit. Therefore, the Portman campaign is sending OXYPAC a refund check for \$2,000.

If additional information or documentation is necessary, or if additional actions need to be taken, please contact me using the information provided.

Thank you,



Chris Fetgatter
Director-Government Relations
OCCIDENTAL PETROLEUM CORP.
1717 Pennsylvania Avenue, NW
Suite 400
Washington, DC 20006
Office: (202) 857-3074
Mobile: (202) 460-1195
Fax: (202) 857-3014
Email: Chris_Fetgatter@Oxy.com

10030370410



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 30, 2010

Roy Pineci, Treasurer
Occidental Petroleum Corporation
Political Action Committee
10889 Wilshire Blvd.
Los Angeles, CA 90024

Response Due Date:
August 4, 2010

Identification Number: C00083857

Reference: June Monthly Report (5/01/10-5/31/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 items:

1. Schedule B of your report (see 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.

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OCCIDENTAL PETROLEUM CORPORATION POLITICAL ACTION COMMITTEE
PAGE 2

Please inform the Commission of your corrective action promptly 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.

2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2010 Primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund 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.

Please inform the Commission of your corrective action promptly 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)

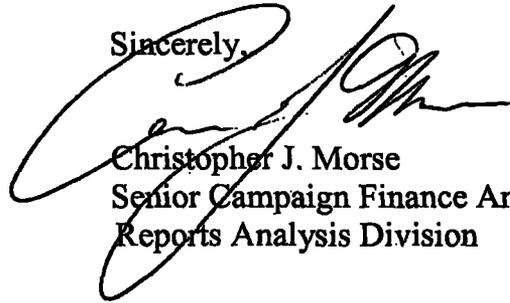
Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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 should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1133.

Sincerely,



Christopher J. Morse
Senior Campaign Finance Analyst
Reports Analysis Division

10030370413

Excessive Contributions to a Candidate

Recipient Name	Date	Amount	Election	Report
Grassley Committee Inc.	9/25/08	\$5,000	*Primary 2008	2008 October Monthly
Grassley Committee Inc.	5/26/10	\$1,000	Primary 2010	2010 June Monthly

*Schedule B of your report discloses this contribution as designated to the 2008 Primary election; however, this candidate did not participate in a Primary election in 2008. Therefore, this contribution has been attributed to the next scheduled Primary election for this candidate, the 2010 Primary.

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election State - Date
Portman For Senate Committee	5/07/10	\$1,000	Primary	OH - 5/04/10
Portman For Senate Committee	5/07/10	\$1,000	Primary	OH - 5/04/10

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Bank of America

5497

C
M CORPORATION
COMMITTEE
ANGELES, CA 90024

Westwood Village
300 Westwood Blvd.
Los Angeles, CA
90024-2089

16-66-1220



On Hand and 3 00 100 Dollars

06 26 2010

51,610.00

Grassley Committee Inc
PO Box 1000
Des Moines, IA 50304

MEMO: 2010 PRIMARY
CONGRESSIONAL

[Handwritten signature]

Security Features. Details on back

2010 SENATORS CLASSIC COMMITTEE 04/10

228 S WASHINGTON ST STE 115
ALEXANDRIA, VA 22314

1018

68-426/514

DATE 6/30/10

PAY TO THE ORDER OF OXYPAC \$ 1,000.00

One Thousand & 00/100

DOLLARS  Security Features. Details on back.



BRANCH BANKING AND TRUST COMPANY
1-800-BANK BBT BBT.com

FOR Contribution refund (ck # 5497)

[Handwritten signature]

MP

10030370415

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

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No Postmark

Overnight Delivery Service (Specify): Shipping Date
 Next Business Day Delivery

Received from House Records & Registration Office Date of Receipt

Received from Senate Public Records Office Date of Receipt

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Other (Specify): Date of Receipt or Postmarked

Am W
 PREPARER

7/14/10
 DATE PREPARED

10030370416