

Western Growers Association

Serving the California and Arizona Fresh Produce Industry



December 11, 2000

Federal Election Commission
Thomas F Maxwell, III, Reports Analyst
Reports Analysis Division
Washington, DC 20463

RE: APRIL QUARTERLY REPORT (1/01/00 – 3/31/00)
Identification: C00193979

Dear Mr. Maxwell:

Pursuant to the letter we received dated November 22, 2000, please note the following regarding contributions to the above captioned Federal PAC:

- All the contributions in question were from either sole proprietorships or partnerships. Please see attached copies of checks in question.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

WESTERN GROWERS ASSOCIATION

Linda Fair
Executive Assistant to Harvey B. Labko, Treasurer

Af

Enclosures

RECEIVED
FEDERAL ROOM
2000 DEC 15 A 10:19



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Harvey Labko, Treasurer
Western Growers Association Political
Action Committee Federal
17620 Fitch Street
Irvine, CA 92714

NOV 22 2000

Identification Number: C00193979

Reference: April Quarterly Report (1/01/00-3/31/00)

Dear Mr. Labko:

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 portions attached) discloses an apparent contribution(s) from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a corporate contribution(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. 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 receiving a refund or granting written authorization for a transfer to another account.

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 transfers-out or refunds should be disclosed on

Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Please amend Schedule B supporting Line 23 by providing the address and office sought including state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Thomas F. Maxwell, III

Thomas F. Maxwell, III
Reports Analyst
Reports Analysis Division

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) WESTERN GROWERS POLITICAL ACTION COMMITTEE I.D. NUMBER C00193979

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Ray-Lee Company Partnership P.O. Box 9159 Bakersfield CA 91309	OCCUPATION: GROWERS	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Jon Jessen 4269 W. County 12 Yuma AZ 85365	Gowan Co. OCCUPATION: PESTICIDES EXECUTIVE	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Sontadelli Bros. 411 Altivo Ave Watsonville CA 95076	OCCUPATION: GROWER	02/07/00	\$500.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	500.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
S. H. Smith Farms P O Box 7 Turlock CA 95381	S. H. Smith Farms OCCUPATION: GROWER	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
John Gless 1441 Ravenswood Ln Riverside CA 92506	OCCUPATION: GROWER	02/25/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$2,640.00

COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME OF COMMITTEE (IN FULL) WESTERN GROWERS POLITICAL ACTION COMMITTEE I.D. NUMBER C00193979

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Bob Grimm P.O. Box 715 Lamont CA 93241	Grimmway Farms OCCUPATION: PARTNER	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
John D'Arrigo 20412 Franciscan Way Salinas CA 93908	D'Arrigo Bros. Co . Of Calif. OCCUPATION: GROWER	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Crown Hill Ranches 85810 Grapefruit Blvd Coachella CA 92236	 OCCUPATION: GROWER	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Gray Eagle Group P.O. Box 2949 Yuma AZ 85364	Gray Eagle Group OCCUPATION: CROW/PACK	02/07/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Mills Bros. Enterprises P.O. Box 642 Salinas CA 93902	Mills Bros. Enterprises OCCUPATION: FARMING	03/24/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL (X) OTHER (SPECIFY)	AGGREGATE YEAR-TO-DATE	535.00	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$2,675.00

TFM

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NAME OF COMMITTEE (IN FULL)
WESTERN GROWERS POLITICAL ACTION COMMITTEE

E.D. NUMBER
C00193979

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
Tom Bengard Ranch P O Box 80090 Salinas, CA 90090	Tom Bengard Ranch OCCUPATION: GROWER	03/02/00	\$535.00
RECEIPT FOR: () PRIMARY () GENERAL () OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	535.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: () PRIMARY () GENERAL () OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: () PRIMARY () GENERAL () OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT OF EACH RECEIPT THIS PERIOD
RECEIPT FOR: () PRIMARY () GENERAL () OTHER (SPECIFY)		AGGREGATE YEAR-TO-DATE	
SUBTOTAL OF RECEIPTS THIS PAGE (OPTIONAL)			\$535.00
TOTAL THIS PERIOD (LAST PAGE THIS LINE NUMBER ONLY)			\$7,990.00

BONTADELLI BROS.

4248

WGPAC 535 CLUB

DATE 01/11/00

ITEM

AMOUNT
500.00

TOTAL

500.00

*904780
part washing*

BONTADELLI BROS.

CALIFORNIA VEGETABLE GROWERS
411 ALTIVO AVENUE
WATSONVILLE, CA 95076
TAX ID. NO. 94-2161783

WELLS FARGO BANK
PAJARO VALLEY OFFICE
WATSONVILLE, CA 95076
11-24-1210

4248

FIVE hundred and 00/100

DATE

AMOUNT

01/11/00 *****500.00

WGPAC 535 CLUB

Arrest J Bontadelli

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704782
~~904781~~

S. H. SMITH FARMS
P.O. BOX 7
TURLOCK, GA 35381

1135

1-18 1900 ^{11-24/258}₁₂₍₀₈₎

PAY TO THE ORDER OF

S35 Club

\$ 535⁰⁰

REGISTERED 535 DOLS 00 CTS

DOLLAR

TURLOCK OFFICE
WELLS FARGO BANK
440 EAST OLIVE STREET, TURLOCK, CA 95351

Stephan H. Smith

FOR

⑈001135⑈ ⑈12⑈000248⑈4256 041229⑈

Some Proprietorship

902797

CROWN HILL RANCHES
PARTNERSHIP ACCT.
85-814 GRAPEFRUIT BLVD.
COACHELLA, CA 92236

90-3042/1272
005519073

1027

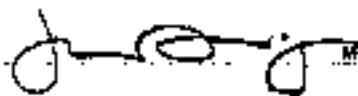
DATE JANUARY 14, 2000

PAY TO THE ORDER OF * WGSAC 535 CLUB * * * * * \$ 535.00 ***

* * * FIVE HUNDRED THIRTY-FIVE AND NO/100 * * * DOLLARS

VIB VALLEY INDEPENDENT BANK
401 East State, Coalinga, California 92231
409-342-6222

MEMO # 535 CLUB



⑆122238420⑆2027⑆005⑆513073⑆

Partnership

Item to be Paid - Description	Check Amount: \$535.00	Discount Taken	Amount Paid
Contribution			535.00

903343
Partnership

GRAY EAGLE GROUP
(520) 783-7813
P.O. BOX 2949
YUMA, AZ 85366

NORWEST BANK, ARIZONA
91-52711221

0251

DATE: Jan 14, 2000 AMOUNT: *****\$535.00*

Memo:

PAY Five Hundred Thirty-five and 0/100 Dollars

TO THE ORDER OF: 535 Club
P. O. Box 2130
Newport Beach, CA 92658

Gary J. Pasquonelli

*Partnership
Tom & Terry Bengard*

OM BENGARD RANCH		P.O. Box 80090 • Salinas, CA 95912-0090	67780 WGPAC-FEDERAL	NET AMOUNT
DATE	DESCRIPTION	AMOUNT	DEDUCTION	
1/04/00	535 CLUB CONTRIBUTION	535.00		535.00
CHECK DATE		CHECK NUMBER	TOTALS ▶	535.00
2/23/00		58616		535.0

~~0000000000~~
904784



TOM BENGARD RANCH
P.O. Box 80090 • Salinas, CA 95912-0090
Telephone (831) 422-9021

WELLS FARGO BANK
Salinas Main Office

1-244
1213E

WARNING
Do not accept this document if you cannot read the amount and other information.

No. 058616

PAY TO THE ORDER OF

FIVE HUNDRED THIRTY FIVE AND NO/100 DOLLARS

WGPAC-FEDERAL
P.O. BOX 2130
NEWPORT BEACH
USA

CA 92658-8944

DATE: 2/23/00
CHECK NO.: 58616
AMOUNT: *****535.00

[Signature]

⑈058616⑈ ⑆12100024604400 093781⑈

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
 <i>CR</i>	 12/15/00
PREPARER	DATE PREPARED