



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

SEP 11 1996

Gene A. Lundquist, Treasurer
Calcot Ltd. Federal Political
Action Committee
P.O. Box 259/1601 E. Brundage Lane
Bakersfield, CA 93302

Identification Number: C00172775

Reference: Mid-Year Report (1/1/95-6/30/95)

Dear Mr. Lundquist:

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 discloses a payment to your connected organization for the use of an airplane resulting in an in-kind contribution to a candidate (pertinent portion attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a committee may prepay its connected organization for the cost of using facilities for events which result in in-kind contributions to candidates. Alternatively, a committee may place funds in escrow for the connected organization to draw on to pay for future in-kind contributions made by the committee.

Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal steps concerning this matter, your prompt action 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) 219-3580.

Sincerely,

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE B - Itemized Disbursements
For Period Ended June 30, 1995

For Line 23

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Name and Address	Purpose of Disbursement	-----Disbursement-----		
		Date	Amount	YTD Amount
Calcot, Ltd. P.O. Box 259 Bakersfield, Ca. 93302	Pymt. for use of Calcot airplanes for Pat Roberts House Candidate	5-10-95	\$4,730.00 (in-kind)	\$4,730.00
Stenholm For Congress Committee 4710 N. 40th St. Arlington, Va. 22207	Contribution to Charles Stenholm House Candidate	6-08-95	\$500.00	\$500.00
Tim Johnson for South Dakota 528 D Street, SE Washington, D.C. 20003-2024	Contribution to Tim Johnson House Candidate	6-08-95	\$1,000.00	\$1,000.00
Committee for Advancement of Cotton P.O. Box 12292 Memphis, TN 38182	Contribution	6-08-95	\$2,500.00	\$2,500.00
John Doolittle For Congress 4220 Rocklin Road, Suite 5-A Rocklin, Ca. 95671	Contribution to John Doolittle House Candidate	6-20-95	\$500.00	\$500.00
Page Total			\$9,230.00	
Total Itemized Disbursements - Line 23			\$17,680.00	

