

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-2

Luther Allan Markwart, Treasurer
American Sugarbeet Growers Association
Political Action Committee
1156 15th Street, NW, Suite 1101
Washington, DC 20005

DEC 11 2002

Identification Number: C00167684

Reference: Amended July Quarterly Report (4/1/02-6/30/02), received 7/19/02

Dear Mr. Markwart:

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 one or more contributions which appear to be 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 any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION
COMMITTEE
PAGE 2

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any 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.

Schedule B of your report discloses an in-kind contribution(s) designated for the general election, but made before the primary election (pertinent portion(s) attached). In-kind contributions of equipment, such as computers, with a long-term useful life (e.g., an election cycle, or perhaps longer) are similar to contributions of money and may be designated for elections beyond the next election, provided the contributor designates the contribution as such in writing. A contribution of this type of equipment is distinguishable from in-kind contributions that are used only for one particular election, such as non-exempt contributions of food or beverages consumed by primary election day workers, or printing or mailing costs related to general election events or fundraisers. Please amend your report to include a description of the nature of the in-kind contribution(s) in question. If the in-kind contribution(s) on your report does not have a "long-term useful life", it may constitute an excessive contribution(s) for the primary election (see Advisory Opinion 1996-29).

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

If you have made an excessive 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 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 reported on Schedule A supporting Line 16 of the Detailed Summary Page of the

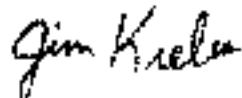
AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION
COMMITTEE
PAGE 3

report covering the period in which they are made. Redesignations should be reported as memo entries on Schedule B of the report covering the period in which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal steps, prompt action by your committee to refund or seek redesignation of the excessive amount will be considered.

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,



Jim Krebs
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

 FOR LINE NUMBER: PAGE # 27
 (check only one)

 11a 11b 11c 12
 13 14 15 16 17

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)

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. Monitor Sugarbeet Growers

Mailing Address

P49 W. Gilford Rd

City

State

Zip Code

Cana

MI

48728

FEC ID number of contributing
federal political committee.

Date of Receipt

M M D D Y Y Y Y
04 30 2002

Name of Employer

Occupation

Receipt For:

Primary General

Aggregate Year-to-Date ▼

14608.02

Other (specify) ▼

Amount of Each Receipt This Period

14608.02

Transaction ID: SA11A1.5343

Full Name (Last, First, Middle Initial)

B. Raymond Fricks

Mailing Address

4586 Garfield Road

City

State

Zip Code

Midleton

MI

48856

FEC ID number of contributing
federal political committee.Name of Employer
Self-employedOccupation
Farmer

Receipt For:

Primary General

Aggregate Year-to-Date ▼

289.41

Other (specify) ▼

Date of Receipt

M M D D Y Y Y Y
04 30 2002

Amount of Each Receipt This Period

289.41

Transaction ID: SA11A1.5352

Full Name (Last, First, Middle Initial)

C. ROANIE BERRY

Mailing Address

832 HG 2

City

State

Zip Code

CARTWRIGHT

ND

58638

FEC ID number of contributing
federal political committee.Name of Employer
SELF-EMPLOYEDOccupation
FARMER

Receipt For:

Primary General

Aggregate Year-to-Date ▼

219.13

Other (specify) ▼

Date of Receipt

M M D D Y Y Y Y
06 27 2002

Amount of Each Receipt This Period

219.13

Transaction ID: SA11A1.5343

15096.56

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

 FOR LINE NUMBER: **PAGE 8/27**
 (check only one)
 11a 11b 11c 12
 13 14 15 16 17

 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)
AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)		Date of Receipt
A. Matthew Herschman		M M D D Y Y Y Y 0 4 3 0 2 0 0 2
Mailing Address <u>2576 S. State Road</u>		Amount of Each Receipt this Period
City <u>Ithaca</u>	State <u>MI</u>	<u>46647</u> <u>256.69</u>
FEC ID number of contributing federal political committee.		
Name of Employer Self-employed (PARTNERSHIP)	Occupation	
Farmer		
Receipt For:	Aggregate Year-to-Date ▼	
Primary General	<u>256.69</u>	
Other (specify) ▼		
		Transaction ID: SA11A1.5354
Full Name (Last, First, Middle Initial)		Date of Receipt
B. Matthew Herschmann		M M D D Y Y Y Y 0 4 3 0 2 0 0 2
Mailing Address <u>2576 S. State Rd.</u>		Amount of Each Receipt this Period
City <u>Ithaca</u>	State <u>MI</u>	<u>46647</u> <u>256.69</u>
FEC ID number of contributing federal political committee.		
Name of Employer Self-employed (PARTNERSHIP)	Occupation	sole proprietor
Farmer		[MEMO ITEM]
Receipt For:	Aggregate Year-to-Date ▼	
Primary General	<u>256.69</u>	
Other (specify) ▼		
		Transaction ID: SA11A1.5354.0
Full Name (Last, First, Middle Initial)		Date of Receipt
C. Holly Sugar Company		M M D D Y Y Y Y 0 6 2 7 2 0 0 2
Mailing Address <u>P.O. Box 9</u>		Amount of Each Receipt this Period
City <u>Sugar Land</u>	State <u>TX</u>	<u>77487</u> <u>3796.68</u>
FEC ID number of contributing federal political committee.		
Name of Employer Holly Sugar Corporation	Occupation	
0		
Receipt For:	Aggregate Year-to-Date ▼	
Primary General	<u>3796.68</u>	
Other (specify) ▼		
		Transaction ID: SA11A1.5339

 SUBTOTAL of Receipts This Page (optional) **4063.37**
 TOTAL This Period (last page this line number only)

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

Like separate schedules, for each category of the Detailed Summary Page			FOR LINE NUMBER: (check only one)	PAGE 25 / 27
	<input type="checkbox"/> 21b <input type="checkbox"/> 26	<input type="checkbox"/> 22 <input type="checkbox"/> 27	<input checked="" type="checkbox"/> 23 <input type="checkbox"/> 28a	<input type="checkbox"/> 24 <input type="checkbox"/> 26b <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)
AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)		Date of Disbursement
A. SANDER LEVIN		05/10/2002
Mailing Address		Amount of Each Disbursement this Period
145 GEORGETOWN SQUARE NORTH		95.96
City ROYAL OAK	State MI	Zip Code 48067
Purpose of Disbursement		Category Type
In-kind for Levin, see Amex		[MEMO ITEM]
Candidate Name		MI Primary was held on 8/6/02.
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	Transaction ID: SB23.5371
State: MI District: 12		
Full Name (Last, First, Middle Initial)		Date of Disbursement
B. LEVIN FOR CONGRESS COMMITTEE		04/20/2002
Mailing Address		Amount of Each Disbursement this Period
P.O. Box 1092		2000.00
City Warren	State MI	Zip Code 48092
Purpose of Disbursement		Category Type
Levin for Congress		
Candidate Name		
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	Transaction ID: SB23.5321
State: MI District: 12		
Full Name (Last, First, Middle Initial)		Date of Disbursement
C. MATSUNAKA FOR CONGRESS		05/20/2002
Mailing Address		Amount of Each Disbursement this Period
2831 NORTH MONROE		69.08
City LOVELAND	State CO	Zip Code 80538
Purpose of Disbursement		Category Type
In-kind for Matsunaka, see AMEX		[MEMO ITEM]
Candidate Name		
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	Transaction ID: SB23.5377
State: CO District: 04		
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 schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER (check only one)	PAGE 14 / 27
	<input checked="" 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)

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)	Date of Disbursement		
A. A LOT OF PEOPLE SUPPORTING TOM DASCHLE INC	M M C D P Y 2 0 0 2		
Mailing Address P O BOX 1856	State SD	Zip Code 57101	Amount of Each Disbursement this Period 1000.00
City SIOUX FALLS			
Purpose of Disbursement A Lot of People Supporting Tom Daschle	Category/ Type		
Candidate Name	Office Sought: <input type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2004 Primary <input checked="" type="checkbox"/> General Other (specify) □	Transaction ID: SB23.5298
State: SD District: 00			
Full Name (Last, First, Middle Initial)	Date of Disbursement		
B. American Express	M M C D P Y 2 0 0 2		
Mailing Address PO Box 42010	State PA	Zip Code 19162-4201	Amount of Each Disbursement this Period 75.48
City Philadelphia			
Purpose of Disbursement Musgrave In-Kind	Category/ Type		
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) □	Transaction ID: SB23.5327
State: PA District:			
Full Name (Last, First, Middle Initial)	Date of Disbursement		
C. American Express	M M C D P Y 2 0 0 2		
Mailing Address PO Box 42010	State PA	Zip Code 19162-4201	Amount of Each Disbursement this Period 68.06
City Philadelphia			
Purpose of Disbursement Musgrave In-Kind	Category/ Type		
Candidate Name	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) □	Transaction ID: SB23.5309
State: PA District:			
SUBTOTAL of Disbursements This Page (optional)	1144.66		
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 15 / 27
<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24
<input type="checkbox"/> 28	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 25
		<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)

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)		Date of Disbursement
A. American Express		05/10/2002
Mailing Address PO Box 42010	0	Amount of Each Disbursement this Period
City Philadelphia	State PA	Zip Code 19162-4201
Purpose of Disbursement		
Bequests In-Kind		
Candidate Name		Category/ Type
Office Sought: House Senate President	Disbursement For: 2002 Primary X General Other (specify) □	
State: Rep District:		Transaction ID: SB23.5310
Full Name (Last, First, Middle Initial)		Date of Disbursement
B. BEN CARDIN FOR CONGRESS		05/15/2002
Mailing Address 100 EAST PRATT STREET 27TH FLOOR	State MD	Amount of Each Disbursement this Period
City BALTIMORE	Zip Code 21202	2000.00
Purpose of Disbursement		
Ben Cardin for Congress		
Candidate Name		Category/ Type
Office Sought: x House Senate President	Disbursement For: 2002 Primary X General Other (specify) □	
State: Rep District: 03		Transaction ID: SB23.5312
Full Name (Last, First, Middle Initial)		Date of Disbursement
C. BOB FITNER FOR CONGRESS		04/11/2002
Mailing Address P.O. Box 127868	State CA	Amount of Each Disbursement this Period
City San Diego	Zip Code 92112	250.00
Purpose of Disbursement		
Bob Fitner for Congress Comt.		
Candidate Name		Category/ Type
Office Sought: x House Senate President	Disbursement For: 2002 Primary X General Other (specify) □	
State: CA District: 51		Transaction ID: SB23.5333
SubTOTAL of Disbursements This Page (optional)		2873.40
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 22 / 27

<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
									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 (or FLC)

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. FRIENDS OF ROY BLUNT

Mailing Address

PO Box 50100

PO Box 50100

City

Springfield

State

MO

Zip Code

65805

Purpose of Disbursement

In-Kind for Blunt, see CMC

Candidate Name

Date of Disbursement

06 18 2002

Office Sought:

 House

Disbursement For:

2002

Senate

Primary

 General

President

Other (specify)

State: MO

District: 07

Full Name (Last, First, Middle Initial)

B. FRIENDS OF SAM JOHNSON

Mailing Address

PO BOX 360096

State

TX

Zip Code

75086

Purpose of Disbursement

Friends of Sam Johnson

Candidate Name

Category/
Type

[MEMO ITEM]

MO Primary was held on
8/16/02.

Transaction ID: SB23.5375

Date of Disbursement

04 09 2002

Office Sought:

 House

Disbursement For:

2002

Senate

Primary

 General

President

Other (specify)

State: TX

District: 03

Full Name (Last, First, Middle Initial)

C. FRIENDS OF SENATOR CARL LEVIN

Mailing Address

P.O. 940X 92038

State

MI

Zip Code

48092

Purpose of Disbursement

Friends of Sen. Carl Levin

Candidate Name

Category/
Type

Transaction ID: SB23.5337

Date of Disbursement

04 23 2002

Office Sought:

 House

Disbursement For:

2002

Senate

Primary

 General

President

Other (specify)

State: MI

District: 06

SUBTOTAL of Disbursements This Page (optional):

4000.00

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 21 of 27

<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
				28

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 COMMITTEEE (in Full)

AMERICAN SUGARBEET GROWERS ASSOCIATION POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

A. FRIENDS OF ROY BLUNT

Mailing Address PO Box 50100	State MO	Zip Code 65805	Date of Disbursement 05/13/2002
Purpose of Disbursement In-Kind for Blunt, see CMC			Amount of Each Disbursement this Period 200.00
Candidate Name			Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) □	[MEMO ITEM] MO Primary was held on 8/6/02.	
State: MO District: 07		Transaction ID: SB23-5372	

Full Name (Last, First, Middle Initial)

B. FRIENDS OF ROY BLUNT

Mailing Address PO Box 50100	State MO	Zip Code 65805	Date of Disbursement 05/20/2002
Purpose of Disbursement Friends of Roy Blunt			Amount of Each Disbursement this Period 2000.00
Candidate Name			Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) □	Transaction ID: SB23-5295	
State: MO District: 07			

Full Name (Last, First, Middle Initial)

C. FRIENDS OF ROY BLUNT

Mailing Address PO Box 50100	State MO	Zip Code 65805	Date of Disbursement 05/20/2002
Purpose of Disbursement In-Kind for Blunt, see AMEX			Amount of Each Disbursement this Period 623.40
Candidate Name			Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General Other (specify) □	[MEMO ITEM] MO Primary was held on 8/6/02.	
State: MO District: 07		Transaction ID: SB23-5378	

SUBTOTAL of Disbursements This Page (optional) □

2000.00

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

22037891799