

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM



Calcot, Ltd. Political Action Committees

P.O. Box 259, Bakersfield, California 93302 • (805) 327-5961

September 23, 1996

Mr. Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington DC 20463

Dear Mr. Davis:

This letter is in response to your correspondence of September 11, 1996 and September 13, 1996, regarding the Calcot Fedpac Mid-Year Report (1/1/95-6/30/95) and the Calcot 12 Day Pre-Primary Report (1/1/96-3/6/96).

Pursuant to discussions with you, we are amending the reports dated 6/30/95 and 12/31/95, and indicating the expense incurred is, indeed, an operating expense rather than an in-kind political contribution. Calcot itself did not expend funds; it merely calculated the cost of the airplane which was then paid by the Calcot Fedpac. If this expenditure is more accurately an operating expense, then the issue regarding the \$5,000 limit referenced in your September 13, letter is moot.

Regarding the first issue raised in the September 13, letter, in reviewing the report we made an error in reporting that we contributed \$1,000 to the Senator Larry Craig campaign. In fact, we contributed \$500 to the Senator Craig campaign. We have corrected that error and have amended the 3/6/96 report accordingly.

For your records the use of the Calcot airplane in transporting Congressman Roberts took place on Friday, April 28, 1995 and Saturday, April 29, 1995. The trip was primarily educational in nature and involved meetings and tours in Napa County with leaders in the wine industry; in Sacramento with David Kennedy, Director of the State Department of Water Resources and John Kautz, Chairman of the Governor's Agricultural Commission; in Marysville, California to tour a prune plant; in Weed, California, to meet with leaders of various agricultural entities (California Executive Bulls); to fly over the Folsom, Sacramento River/Delta and San Joaquin Valley water facilities; and to visit an avocado farm near Oxnard, California.

On Saturday, Congressman Roberts toured a lemon grove and citrus packing facilities in Oxnard; cotton marketing facilities in Bakersfield; was briefed by citrus growers in Porterville, California; toured a chicken processing plant in Merced; a dairy facility in Merced; and met with cattle industry people in Auburn.

Mr. Kenneth Davis
September 23, 1996
Page 2

As a result of your inquiry, the Calcot Fedpac has amended its policy regarding "in-kind" contributions and from this point forward will make certain that either an escrow account is established or expenses are pre-paid out of the Calcot Fedpac.

Hopefully, these changes will satisfy the issues which you raised in your September 11 and September 13 letters.

Sincerely,

A handwritten signature in cursive script that reads "Gene A. Lundquist".

Gene A. Lundquist
Treasurer, Calcot Fedpac



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

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 30 12 06 PM '96

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Calcot, Ltd, Federal Political Action Committee	2. FEC IDENTIFICATION NUMBER C00172775
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported P O Box 259	3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (see FEC FORM 1M)
CITY, STATE and ZIP CODE Bakersfield, CA 93302	

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

- Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31
- Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
- Thirtieth day report following the General Election on _____
 in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1-1-95</u> through <u>6-30-95</u>		
6. (a) Cash on Hand January 1, 19 <u>95</u>		\$ 21,512.62
(b) Cash on Hand at Beginning of Reporting Period	\$ 21,512.62	
(c) Total Receipts (from Line 19)	\$ 16,899.19	\$ 16,899.19
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 38,411.81	\$ 38,411.81
7. Total Disbursements (from Line 30)	\$ 18,199.00	\$ 18,199.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 20,212.81	\$ 20,212.81
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	For further information contact: Federal Election Commission 899 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 0.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Gene A. Lundquist	Date
Signature of Treasurer 	9/23/96

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

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**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

(revised 1/1/91)

NAME OF COMMITTEE Calcot, Ltd Federal Political Action Committee		REPORT COVERING PERIOD FROM 1-1-95 TO: 6-30-95	
C00172775		COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts			
11. Contributions (other than loans) From:			
a. Individuals/Persons Other Than Political Committees			
i. Itemized (use Schedule A)		10,814.61	10,814.61
ii. Unitemized		5,447.10	5,447.10
iii. Total	(add i and ii) >	16,261.71	16,261.71
b. Political Party Committees		0.00	0.00
c. Other Political Committees (such as PACs)		0.00	0.00
d. Total Contributions	(add a iii, b and c) >	16,261.71	16,261.71
12. Transfers From Affiliated/Other Party Committees			
13. All Loans Received			
14. Loan Repayments Received			
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)			
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees			
17. Other Federal Receipts (Dividends, Interest, etc.)	Schedule A	637.48	637.48
18. Transfers from Nonfederal Account for Joint Activity		0.00	0.00
19. Total Receipts	(add 11d, 12, 13, 14, 15, 16, 17, and 18) >	16,899.19	16,899.19
20. Total Federal Receipts	(subtract line 18 from line 19) >	16,899.19	16,899.19
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share			
ii. Non-Federal Share			
b. Other Federal Operating Expenditures	Schedule B	4,730.00	4,730.00
c. Total Operating Expenditures	(add a i, a ii, and b) >	4,730.00	4,730.00
22. Transfers to Affiliated/Other Party Committees			
23. Contributions to Federal Candidates/Committees and Other Political Committees	SCH. B	12,950.00	12,950.00
24. Independent Expenditures (use Schedule E)			
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)			
26. Loan Repayments Made			
27. Loans Made			
28. Refunds of Contributions To:			
a. Individuals/Persons Other Than Political Committees			
b. Political Party Committees			
c. Other Political Committees (such as PACs)			
d. Total Contribution Refunds	(add a, b and c) >		
29. Other Disbursements	Federal & State Taxes	519.00	519.00
30. Total Disbursements	(add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	18,199.00	18,199.00
31. Total Federal Disbursements	(subtract line 21 a ii from line 30) >	18,199.00	18,199.00
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)		16,261.71	16,261.71
33. Total Contribution Refunds (from line 28d)		0.00	0.00
34. Net Contributions (other than loans)(subtract line 33 from 32)		16,261.71	16,261.71
35. Total Federal Operating Expenditures	(add 21 a i and 21 b) >	4,730.00	4,730.00
36. Offsets to Operating Expenditures (from line 15)		0.00	0.00
37. Net Operating Expenditures	(subtract line 36 from 35) >	4,730.00	4,730.00

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

For Line 23

Name and Address	Purpose of Disbursement	-----Disbursement-----		
		-----Period----- Date	Amount	YTD Amount
Stenholm For Congress Committee 4710 N. 40th St. Arlington, Va. 22207	Contribution For Charles Stenholm House Candidate	6-8-95	\$500.00	\$500.00
Tim Johnson For South Dakota 328 D Street, SE Washington, D.C. 20003-2024	Contribution to Tim Johnson House Candidate	6-8-95	\$1,000.00	\$1,000.00
Committee For Advancement of Cotton P.O. Box 12292 Memphis, In. 38182	Contribution	6-8-95	\$2,500.00	\$2,500.00
John Doolittle For Congress 4220 Rocklin Road, Suite 5-A Rocklin, Ca. 95677	Contribution to John Doolittle House Candidate	6-20-95	\$500.00	\$500.00
Page Total			\$4,500.00	
Total Itemized Disbursements - Line 23			\$12,950.00	

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

(Other Disbursements)

For Line 21(b)

Operating Expenditures

Name and Address

Purpose of Disbursement

Date

Disbursement
Period Amount

YTD
Amount

Calcot, Ltd.
P.O. Box 259
Bakersfield, Ca. 93302

Operating costs for use of Calcot
airplane for educational trip of
Pat Roberts House Candidate.

5-10-95

\$4,730.00


\$4,730.00

Total Operating Expenses - Line 21(b)

\$4,730.00

**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.

<input type="checkbox"/> Hand Delivered	DATE OF RECEIPT
<input type="checkbox"/> First Class Mail	POSTMARKED
<input checked="" type="checkbox"/> Registered/Certified Mail	POSTMARKED 9-24-96
<input type="checkbox"/> No Postmark	
<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
 PREPARER	10-2-96 DATE PREPARED