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April 14, 2005

Federal Election Commission
Washington, DC 20463

RE: Western Growers Political Action Committee
FEC PAC #C00193979

To Whom It May Concern:

This letter is in response to your letter dated April 8, 2005, Exhibit A attached.

It references Western Growers' October Quarterly Report (7/1/04 - 9/30/04).

Please note that the contributions in question for Growers Express (\$1,000.00) and Tri-C Leasing Company (\$2,500.00) are partnerships and not corporations as can be confirmed by Exhibits B and C attach hereto.

Therefore, no changes, transfers or amendments need to be filed regarding your letter or content.

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

Harvey B. Labko
Treasurer
Western Growers PAC

HBL/ll

Enclosures

25038784829



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 2005

RQ-2

Harvey Labko, Treasurer
Western Growers Association
Political Action Committee Federal
17620 Fitch Street, P.O. Box 2130
Irvine, CA 92714

RECEIVED 4/12/05
DEADLINE 5/9/05

Response Due Date:
May 9, 2005

Identification Number: C00193979

Reference: October Quarterly Report (7/1/04-9/30/04)

Dear Mr. Labko:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses one or more contributions totaling \$1,000 and \$2,500 from "Growers Express" and "Tri-C Leasing Company," respectively, which appear to be corporations. 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).

EXHIBIT "A"

25038784830

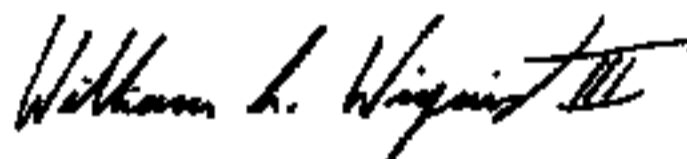
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction 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.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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) 694-1394.

Sincerely,



William S. Wiquist
Campaign Finance Analyst
Reports Analysis Division

Member Master File Inquiry

Member No. 00936 Status A ACTIVE Type R REGULAR Anniversary 02/01/1987
Name Growers Express LLC PARTNERSHIP

Sort Name: Growers Express LLC

Address: 1219 Abbott Street

Salinas CA 93901 COUNTY-MONTEREY

Phone: OF 831/757-9700 FX 831/757-9991

Website: growersexpress.com

Service District: M SALINAS/MONTEREY/CARMEL

Voting District: 011 MONTEREY COUNTY/SALINAS

Quail St. District: 000

State Senate District: C15 Bruce McPherson

CA. Assm/AZ House of Rep: C28 Peter Frusetta

Federal Senate District: CS1 Feinstein (D)/ Boxer (D)

Federal Congress District: C17 Sam Farr

Number of Employees: 00010

% of Business Ag: 100

Years in Business: 001

Type of Business: 005 PACKER/SHIPPER

Automated: NO

Discount: A/T

Sponsor: A E SALINAS

EXHIBIT "B"

CMD 1 RETURNS

ROLL KEYS AVAILABLE

Linda Fair

From: Matt McInerney
Sent: Wednesday, April 13, 2005 2:59 PM
To: Linda Fair
Subject: RE: Tri-C Leasing Co.

Linda: Thanks for the email on the Tri-C Leasing Co. As I indicated, today I had the opportunity to talk with George Cappello. He confirmed that Tri-C was a partnership comprised of he, his sister and father. After his father passed away, his two brothers also became partners. All the partners were individuals. I understand that the company and that partnership have now been dissolved. Any other questions, please call. Thanks, Matt

Matt McInerney
Executive Vice President
Western Growers
949-863-1000
949-863-9028 fax
949-885-2263 direct line
949-809-6263 direct fax

-----Original Message-----

From: Linda Fair
Sent: Wednesday, April 13, 2005 1:48 PM
To: Matt McInerney
Subject: Tri-C Leasing Co.

Mr. McInerney,

Per our conversation 4/13/05 regarding Tri-C Leasing Co. and your knowledge of both the person and business of former Western Growers member, George Cappello and the partnership of Tri-C Leasing Co. prior to its' closure, could you please validate your understanding of this business partnership by reply e-mail for enclosure with the FEC letter I am formulating?

Thank you.

Linda Fair
Western Growers
Executive Administrative Assistant - Finance
PO Box 2130, Newport Beach, CA 92658
Phone: (949) 885-2384
Fax: (949) 809-6384

4/13/2005

EXHIBIT "C"

25038784833

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) 4/15/05
<input type="checkbox"/> USPS Priority Mail Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	Postmarked
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify): Next Business Day Delivery <input type="checkbox"/>	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

Jer
 PREPARER
 (3/2005)

4/22/05
 DATE PREPARED

25038784834