



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

James A. Henry, Treasurer
J.G. Boswell Company Employees'
Political Action Committee
333 South Hope Street, Suite 4600
Los Angeles, CA 90071

NOV 23 1994

Identification Number: C00082677

Reference: October Quarterly (7/1/94-9/30/94) and 12 Day Pre-General (10/1/94-10/19/94) Reports

Dear Mr. Henry:

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:

-On Schedule A, supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from numerous trust funds (pertinent portions attached). Please amend your report to include the full name of the contributor. (11 CFR §110.1(i)(2))

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,

Terry Reynolds
Reports Analyst
Reports Analysis Division

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A. Full Name, Calling Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Cash Received This Period
Ethel-Nepher Trust 1101 Eugenia Park, Suite D Capistrano, CA 92613 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			02/28/94	\$ 0.00
Steven M. Clark, Sr. 1101 Eugenia Park, Suite D Capistrano, CA 92613 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			02/28/94	\$ 0.00
Ethel-Nepher Trust 1101 Eugenia Park, Suite D Capistrano, CA 92613 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			02/28/94	\$ 0.00
Anderson D. Warwick P. O. Box 1787 Gastonia, NC 28053 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Partials Mfg President & CEO	02/28/94	\$ 800.00
Wallace A. Erickson 19801 Deepstar Lane Covina, CA 91724 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		None Retired	02/28/94	\$ 800.00
Susan W. Duh Pl. a River Ranch Road 8408 County Road Hillsboro, CO 81120 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		None Housewife	02/28/94	\$ 5,000.00
Josephine B. Larkin 840 West Santa Inez Avenue Hillsborough, CA 94010 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		None Housewife	02/28/94	\$ 2,000.00
SUBTOTAL of Receipts This Page (optional)				\$ 13,800.00
TOTAL This Period (fill page 6B line number only)				

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A. Full Name, Mailing Address and ZIP Code		Name of Employer	Date (month, day, year)	Amount of Each Payment This Period
James M. Madison 602 Ave B Hattiesburg, MS 39303 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		Madison Law Firm Hattiesburg, MS Aggregate Year-to-Date > \$ 1,000.00	02/28/94	\$ 1,000.00
Albert P. Madison 8222 N. 29th Avenue Phoenix, AZ 85018 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 1,000.00	02/28/94	\$ 1,000.00
Father-Son Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 1,000.00	02/28/94	\$ 1,000.00
Ernest M. Clark, Jr. Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 1,702.00	02/28/94	\$ 1,702.00
Mildred-Jacobs Trust 1101 Eugenia Place, Suite U Carpinteria, CA 93013 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 2,000.00	02/28/94	\$ 2,000.00
Father-Daughter Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 1,400.00	02/28/94	\$ 1,400.00
Mildred-Hopkins Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013 Recipient For: <input type="checkbox"/> Primary <input type="checkbox"/> Spouse <input type="checkbox"/> Other (specify)		None Description: None Aggregate Year-to-Date > \$ 2,000.00	02/28/94	\$ 2,000.00
SUBTOTAL of Payments This Page (optional)				\$ 11,004.00
TOTAL This Period (fill page into line number only)				

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)

J. G. Boswell Company Employees' Political Action Committee

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James E. McInamy 180 Sequoia Drive Pasadena, CA 91105	Day, Simonds & McInamy Occupation: Insurance Broker	10/04/94	\$ 200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 200.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Cynthia Dulin Herr 237 S. Spring Avenue LaGrange, IL 60525	None Occupation: Housewife	10/04/94	\$ 300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 300.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Cynthia Clark Mitchel Trust 1101 Eugenia Place, Suite D Carpinteria, CA 93013		10/04/94	\$5,000.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 5,000.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
None Voll Box 1747 Cambria, CA 93428-1747	None Occupation: Retired	10/11/94	\$ 750.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 750.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dave Cozys 8005 Montmady Bakersfield, CA 93311	J. G. Boswell Company Occupation: Ranch Manager	10/04/94	\$ 300.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 300.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional) _____

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

\$6,550.00

(1) Contributions by spouses and minors. (i) The limitations on contributions of this section shall apply separately to contributions made by each spouse even if only one spouse has income.

(j) Minor children (children under 18 years of age) may make contributions to any candidate or political committee which in the aggregate do not exceed the limitations on contributions of this section, if—

(i) The decision to contribute is made knowingly and voluntarily by the minor child;

(ii) The funds, goods, or services contributed are owned or controlled exclusively by the minor child, such as income earned by the child, the proceeds of a trust for which the child is the beneficiary, or a savings account opened and maintained exclusively in the child's name; and

(iii) The contribution is not made from the proceeds of a gift, the purpose of which was to provide funds to be contributed, or is not in any other way controlled by another individual.

(j) Application of limitations to elections. (i) The limitations on contributions of this section shall apply separately with respect to each election as defined in 11 CFR 108.2, except that all elections held in a calendar year for the office of President of the United States (except a general election for that office) shall be considered to be one election.

(2) An election in which a candidate is unopposed is a separate election for the purposes of the limitations on contributions of this section.

(3) A primary or general election which is not held because a candidate is unopposed or received a majority of votes in a previous election is a separate election for the purposes of the limitations on contributions of this section. The date on which the election would have been held shall be considered to be the date of the election.

(4) A primary election which is not held because a candidate was nominated by a caucus or convention with authority to nominate is not a separate election for the purposes of the limitations on contributions of this section.

(k) Joint contributions and reattributions. (i) Any contribution

made by more than one person, except for a contribution made by a partnership, shall include the signature of each contributor on the check, money order, or other negotiable instrument or in a separate writing.

(2) If a contribution made by more than one person does not indicate the amount to be attributed to each contributor, the contribution shall be attributed equally to each contributor.

(3)(i) If a contribution to a candidate or political committee, either on its face or when aggregated with other contributions from the same contributor, exceeds the limitations on contributions set forth in 11 CFR 110.1 (b), (c) or (d), as appropriate, the treasurer of the recipient political committee may ask the contributor whether the contribution was intended to be a joint contribution by more than one person.

(ii) A contribution shall be considered to be reattributed to another contributor if—

(A) The treasurer of the recipient political committee asks the contributor whether the contribution is intended to be a joint contribution by more than one person, and informs the contributor that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution; and

(B) Within sixty days from the date of the treasurer's receipt of the contribution, the contributors provide the treasurer with a written reattribution of the contribution, which is signed by each contributor, and which indicates the amount to be attributed to each contributor if equal attribution is not intended.

(i) Supporting evidence. (i) If a political committee receives a contribution designated in writing for a particular election, the treasurer shall retain a copy of the written designation, as required by 11 CFR 110.1(b)(4) or 110.2(b)(4), as appropriate. If the written designation is made on a check or other written instrument, the treasurer shall retain a full-size photocopy of the check or written instrument.

(2) If a political committee receives a written redesignation of a contribution for a different election, the treasurer shall retain the written redesignation provided by the contributor, as re-

quired by 11 CFR 110.2(b)(6), as appropriate.

(3) If a political committee receives a written reattribution of a contribution to a different contributor, the reattribution shall retain the reattribution signed by the contributor, as required by 11 CFR 110.1(b)(4).

(4) If a political committee is to rely on a postmark, the date on which a contribution is made, the treasurer shall retain a copy of the envelope or a copy of the return of the postmark as supporting information.

(5) If a political committee receives a written redesignation required by 110.1(c)(2), the contribution shall be designated for a particular election as of 11 CFR 110.2(b)(3)(i) shall apply. If a committee does not retain records concerning a reattribution required by 110.1(c)(3), (4) or (5), the reattribution shall and the original designation shall control.

(6) For each written reattribution of a contribution described in paragraph (b)(3) of this section, the committee shall retain a written demonstration of the reattribution or written receipt. Such demonstration shall consist of:

(i) A copy of the original postmark and the return or return address or of note; or

(ii) A copy of the written or written receipt, date stamp indicating committee's receipt; or

(iii) A copy of the written or written receipt of the contributor.

(m) Contributions to delegate committees. (i) Delegates for the purpose of their selection under 11 CFR 110.1 are not subject to the 11 CFR 110.1 section.

(2) Contributions to delegates under 11 CFR 110.1 are not subject to the limitations of this section.

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