FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Herbert Kaprielian, Treasurer
California Grape & Tree Fruit
League Political Action Committee
1540 E Shaw, Suite 120
Fresno, CA 93710

JUL 26 1995

Identification Number: C00121582

Reference: Mid-Year (1/1/93-6/30/93), Year End (7/1/93-12/31/93), July Quarterly (5/19/94-6/30/94) and Year End (11/29/94-12/31/94) Reports

Dear Mr. Kaprielian:

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 supporting Line 21(b) (pertinent portion(s) attached) discloses disbursements to California Grape and Tree Fruit League State PAC for fundraising expenses. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 21(b) were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide 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

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

95039572825

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,

Neil Evans
Reports Analyst
Reports Analysis Division

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9503372896

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 21b

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)

California Grape & Tree Fruit League PAC - Federal

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code J. Richard Eichman, CPA 1127-11th Street, Suite 300 Sacramento, CA 95814	Accounting Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	1/20/93 2/26/93 3/19/93	113.29 100.40 100.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	4/22/93 5/28/93 6/17/93	100.00 100.00 100.00
C. Full Name, Mailing Address and ZIP Code California Grape & Tree Fruit League Fruit PAC 1540 E. Shaw Avenue Fresno, CA 93710	Purpose of Disbursement Fundraising Expense Disbursement for ☐ Primary ☐ General ☐ Other (specify)	2/19/93	471.69
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	1,085.38
TOTAL This Period (last page this line number only)	1,085.38

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 21b

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NAME OF COMMITTEE (In Full)

California Grape & Tree Fruit League PAC - Federal

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1. California Grape & Tree Fruit League Fruit PAC 1540 E. Shaw Avenue Fresno, CA 93710	Fundraising Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	7/22/93	158.20
2. J. Richard Eichman 1127-11th Street, Suite 300 Sacramento, CA 95814	Accounting Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	7/22/93 8/24/93 9/17/93	100.00 100.00 100.00
3. J. Richard Eichman 1127-11th Street, Suite 300 Sacramento, CA 95814	Accounting Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/13/93 11/19/93 12/13/93	100.00 100.00 100.42
4. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
5. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
6. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
7. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
8. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
9. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	758.62
TOTAL This Period (last page this line number only)	758.62

SCHEDULE B

ITEMIZED DISBURSEMENTS
(Operating Expenditures)

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

PAGE 1 OF

FOR LINE NUMBER 21b

NAME OF COMMITTEE (in Full)
California Grape & Tree Fruit League Federal

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For the Period 05-19-94 thru 06-30-94

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Disbursement This Period	Disb. for
California Grape & Tree Fruit League State PAC 1540 E. Shaw Ave, Ste 120 Fresno, CA 95710	Fundraising Expenses Aggregate Year to date: $1,526.71	05-31-94	134.19	
J. Richard Eichman 1127-11th Street Suite 300 Sacramento, CA 95814	Accounting Services Aggregate Year to date: $618.09	05-28-94 06-16-94	111.37 101.68	

SUBTOTAL of Disbursements This Page (optional)..... $347.19

TOTAL This Period (last page this line number only)..... $347.19

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SCHEDULE B

ITEMIZED DISBURSEMENTS
(Operating Expenditures)

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

PAGE 1 OF

FOR LINE NUMBER 21b

NAME OF COMMITTEE (In Full)
California Grape & Tree Fruit League Federal

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For the Period 11-29-94 thru 12-31-94

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Disbursement This Period	Disb. for
CA Grape & Tree Fruit 1540 E. Shaw Avenue Suite 120 Fresno, CA 93710	Fundraising Expenses Aggregate Year to date: $219.73	12-28-94	151.91*	Not App
California Grape & Tree Fruit League State PAC 1540 E. Shaw Ave, Ste 120 Fresno, CA 93710	Fundraising Expenses Aggregate Year to date: $2,640.71	12-30-94	1,112.00	Not App
J. Richard Eichman 1127-11th Street Suite 300 Sacramento, CA 95814	Accounting Services Aggregate Year to date: $1,236.17	12-28-94	100.00	Not App

SUBTOTAL of Disbursements This Page (optional)..... $1,363.91

TOTAL This Period (last page this line number only)..... $1,363.91

*Subvendor: U.S. Postmaster
10 Bullard Avenue
Clovis, CA 93612