

## ETEXT ATTACHMENT

07/24/2003 18:11

Mr. John D. Gibson  
Assistant Staff Director  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington DC, 20463

Re: American Council of Life Insurers PAC ("ACLI-PAC"), C00147066  
Response to Request(s) for Additional Information

Dear Mr. Gibson:

This letter is a follow-up to a letter filed on April 14, 2003 in response to the FEC's Request for Additional Information dated December 11, 2002 ("RFAI") and the 2d Request for Additional Information dated January 30, 2003 ("2d RFAI") regarding ACLI PAC's 12-Day Pre-General Report (10/1/02-10/16/02) ("2002 Pre-General Report").

We have been in the process of researching the information needed to respond to the questions posed in the RFAI, and have amended the 2002 Pre-General Report to reflect in-kind contributions from the ACLI PAC to the following federal committees:

- Norm Coleman for US Senate (C00367292) for \$300.00
- Tiberi for Congress (C00347492) for \$300.00
- Pryce Project (C00330068) for \$990.00

The disbursements were made from ACLI PAC to ACLI to pay for room rental or other costs associated with events to benefit the referenced committees. The committees were notified of these in-kind contributions on October 23, 2002. Copies of the notification letters that were sent to the candidates are being separately transmitted to you via U.S. mail, along with a copy of this letter.

The delay in payment by ACLI PAC resulted from a billing error by the outside vendor who mistakenly included the amounts for these events in a larger invoice to ACLI instead of separately billing ACLI PAC. The ACLI PAC was not aware until some time later that the invoice had been mistakenly included with the invoices to ACLI. At that time, ACLI PAC immediately paid ACLI for the portion of the bills properly payable by ACLI PAC and notified the campaign committees of the in kind contribution(s) as indicated by the letters.

Since these events occurred, we have taken steps to insure that all costs associated with fundraising events for candidates are billed directly to ACLI PAC for payment, rather than ACLI.

If there are any additional questions or concerns, please direct them to my attention by calling (202) 624-2360, or, in my absence, to the attention of our PAC Administrator, Kate Smith, at (202) 624-2035.

Sincerely,

Joanne Daly  
Assistant Treasurer