Torchmark Corporation
2001 Third Avenue, South
Birmingham, Alabama 35233-2186
205 325 4200

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM
APR 13 11 53 AM '98

Torchmark Corporation

April 7, 1998

Mr. Richard Ng
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: Torchmark Corporation Political
Action Committee
ID# C00167460

Dear Mr. Ng:

In response to your letter received April 7 (copy attached), I am submitting with this letter an Amended February Monthly Report (January 1, 1998 through January 31, 1998).

The February Monthly Report (January 1, 1998 through January 31, 1998) Schedule B supporting Line 23 has been corrected to show the correct "Purpose of Disbursement" for the disbursements in question. Also, attached are copies of the checks payable to "Friends of Senator Don Nickles" and "Coverdell Good Government" as further evidence that these checks were designated for the 1998 General Election.

If further information is needed to clear this matter up, please let me know.

Sincerely,

Ann K. Mobley
Assistant Treasurer
Torchmark Federal Political
Action Committee

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR - 1 1998

Stephen W. Still, Treasurer
Torchmark Corporation Political
Action Committee (TORCH-PAC)
2001 Third Avenue South
Birmingham, AL 35233

Identification Number: C00167460

Reference: February Monthly Report (1/1/98-1/31/98)

Dear Mr. Still:

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 (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

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) 694-1130.

Sincerely,

Richard Ng
Reports Analyst
Reports Analysis Division

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

Apr 13 11 53 AM '98

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full)
Torchmark Federal Political Action Committee of Torchmark Corporation

ADDRESS (number and street) ☐ Check if different than previously reported
2001 Third Avenue South

CITY, STATE and ZIP CODE
Birmingham, AL 35233

2. FEC IDENTIFICATION NUMBER
C0167460

3. ☐ This committee has qualified as a multicandidate committee. (see FEC FORM 1M)
May 25, 1983

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 January 1, 1998 through January 31, 1998		
6. (a) Cash on Hand January 1, 19 98		$ 31,991.95
(b) Cash on Hand at Beginning of Reporting Period	$ 31,991.95	
(c) Total Receipts (from Line 19)	$ 10,906.43	$ 10,906.43
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 42,898.38	$ 42,898.38
7. Total Disbursements (from Line 30)	$ 4,000.00	$ 4,000.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 38,898.38	$ 38,898.38
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	$ NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	$ NONE	

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-219-3420

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: Ann K. Mobley - Assistant Treasurer

Signature of Treasurer: Ann K Mobley

Date: 4-7-98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
(revised 8/93)

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

(revised 1/1/91)

NAME OF COMMITTEE Torchmark Federal Political Action Committee of Torchmark Corporation

REPORT COVERING PERIOD FROM January 1, 1998 TO: January 31, 1998

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (use Schedule A)	6,533.32	6,533.32
ii. Unitemized	4,373.11	4,373.11
iii. Total (add i and ii) ➤	10,906.43	10,906.43
b. Political Party Committees		
c. Other Political Committees (such as PACs)		
d. Total Contributions (add a iii, b and c) ➤	10,906.43	10,906.43
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.)		
18. Transfers from Nonfederal Account for Joint Activity		
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) ➤	10,906.43	10,906.43
20. Total Federal Receipts (subtract line 18 from line 19) ➤	10,906.43	10,906.43
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		
c. Total Operating Expenditures (add a i, a ii, and b) ➤		
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees	4,000.00	4,000.00
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		
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) ➤	4,000.00	4,000.00
31. Total Federal Disbursements (subtract line 21 a ii from line 30) ➤	4,000.00	4,000.00
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans)(from line 11d)	10,906.43	10,906.43
33. Total Contribution Refunds (from line 28d)		
34. Net Contributions (other than loans)(subtract line 33 from 32)	10,906.43	10,906.43
35. Total Federal Operating Expenditures (add 21 a i and 21 b) ➤	0.00	0.00
36. Offsets to Operating Expenditures (from line 15)		
37. Net Operating Expenditures (subtract line 36 from 35) ➤	0.00	0.00

SCHEDULE A

ITEMIZED RECEIPTS

LINE # 11A

ANY INFORMATION COMPIES FROM SUCH REPORTS AND STATEMENT MAY NOT BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS FOR 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)
TORCHMARK FEDERAL POLITICAL ACTION COMMITTEE OF TORCHMARK CORPORATION

FULL NAME, MAILING ADDRESS & ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	OCCUPATION	AGGREGATE YTD	DEDUCTION PER PAY PERIOD	AMT. REC THIS PERIOD
BRILL, TONY P. O. BOX 2612 BIRMINGHAM, AL 35202	TORCHMARK CORPORATION 2001 THRID AVE SO BIRMINGHAM, AL 35233	PAYROLL DEDUCTION (SEMI-MONTHLY)	VICE PRESIDENT	416.66	208.33	416.66
HUDSON, C. B. P. O. BOX 610 DALLAS, TX 75221	UNITED AMERICAN INS. CO. 2909 NO. BUCKNER BLVD. DALLAS, TX 75221	PAYROLL DEDUCTION (SEMI-MONTHLY)	CHAIRMAN	5,000.00	2,500.00	5,000.00
MCANDREW, MARK P. O. BOX 610 DALLAS, TX 75221	UNITED AMERICAN INS. CO. 2909 NO. BUCKNER BLVD. DALLAS, TX 75221	PAYROLL DEDUCTION (SEMI-MONTHLY)	PRESIDENT	200.00	100.00	200.00
HERRMANN, HENRY P. O. BOX 1342 KANSAS CITY, MO 64141	WADDELL & REED INC. ONE CROWN CENTER KANSAS CITY, MO 64141	PAYROLL DEDUCTION (SEMI-MONTHLY)	EXECUTIVE VICE PRE	500.00	250.00	500.00
HECHLER, ROBERT P. O. BOX 1342 KANSAS CITY, MO 64141	WADDELL & REED INC. ONE CROWN CENTER KANSAS CITY, MO 64141	PAYROLL DEDUCTION (SEMI-MONTHLY)	EXECUTIVE VICE PRE	416.66	208.33	416.66

SUBTOTAL OF RECEIPTS THIS PAGE 6,533.32

TOTAL THIS PERIOD (THIS LINE THIS PAGE ONLY) 6,533.32

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE / / OF / /

FOR LINE NUMBER 23

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)

Torchmark Federal Political Action Committee
of Torchmark Corporation

A. Full Name, Mailing Address and ZIP Code Hatch Election Committee 267 East 200 South, Suite 950 Salt Lake City, UT 84111	Purpose of Disbursement Contribution – Senator from Utah Disbursement for: [X] Primary [ ] General [ ] Other (specify) 2000	Date (month, day, year) 1-8-98	Amount of Each Disbursement This Period 1,000.00
B. Full Name, Mailing Address and ZIP Code Friends of Senator Don Nickles P. O. Box 21033 Alexandria, VA 22320-2033	Purpose of Disbursement Contribution – Senator from Oklahoma Disbursement for: [ ] Primary [X] General [ ] Other (specify) 1998	Date (month, day, year) 1-8-98	Amount of Each Disbursement This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Coverdell Good Government P. O. Box 53381 Atlanta, GA 30355	Purpose of Disbursement Contribution – Senator from Georgia Disbursement for: [ ] Primary [X] General [ ] Other (specify) 1998	Date (month, day, year) 1-8-98	Amount of Each Disbursement This Period 1,000.00
D. Full Name, Mailing Address and ZIP Code Victory '98 Alabama Republican Party P. O. Box 320800 Birmingham, AL 35232	Purpose of Disbursement Contribution Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 1-13-98	Amount of Each Disbursement This Period 1,000.00
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) .....

TOTAL This Period (last page this line number only) 54,000.00

FE5AN088

Torchmark Corporation

Check requisition for:
Federal Political Action Committee of Torchmark Corporation

Date of request

Dollars | Cents

Torchmark Corporation Birmingham, Alabama
Federal Political Action Committee of Torchmark Corporation

No. Y 02995

Date January 8, 1998

Pay Exactly $***1,000.00***

Void After 90 Days From Date

Pay To the Order of
Friends of Senator Don Nickles
P. O. Box 21033
Alexandria, VA 22320-2033

Torchmark Corporation
Federal Political Action Committee

NON-NEGOTIABLE

SouthTrust Bank of Alabama, N.A.

By _____
Authorized Representative

Detach This Portion Before Depositing Check and Keep as Your Record

Cost Code (6-8)	Account No. (26-29)	State Code (32-33)	Amount (46-54)	In Payment of
X	4000		$1,000.00	Contribution - Senator from Oklahoma 1998 General Torchmark Federal Political Action Committee of Torchmark Corporation qualified as a Multicandidate Committee on May 25, 1983

(-) In this Column Indicates Credits

T-11, Ed. 10-84 Torchmark Corporation Birmingham, Alabama FILE COPY

Authorized by

Check date 1/1/98

T-10, Ed. 5-83

Torchmark Corporation

Check requisition for:
Federal Political Action Committee of Torchmark Corporation

Date of request | Dollars | Cents

Torchmark Corporation Birmingham, Alabama

Federal Political Action Committee of Torchmark Corporation

No. Y 02996

Date January 8, 1998

Pay Exactly $***1,000.00***

Void After 90 Days From Date

Pay To the Order of

Coverdell Good Government
P. O. Box 53381
Atlanta, GA 30355

Torchmark Corporation
Federal Political Action Committee

NON-NEGOTIABLE

SouthTrust Bank of Alabama, N.A.

By _____
Authorized Representative

Detach This Portion Before Depositing Check and Keep as Your Record

Cost Code (6-8)	Account No. (26-29)	State Code (22-33)	Amount (46-54)	In Payment of
X	4000		$1,000.00	Contribution - Senator from Georgia 1998 General Torchmark Federal Political Action Committee of Torchmark Corporation qualified as a Multicandidate Committee on May 25, 1983

(-) In this Column Indicates Credits.

T-11, Ed. 10-84 Torchmark Corporation Birmingham, Alabama FILE COPY

Authorized by

Check date 1/ /98

T-10, Ed. 5-83

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.

☐	Hand Delivered	Date of Receipt
☐	First Class Mail	POSTMARKED
☑	Registered/Certified Mail	POSTMARKED 4-8-98
☐	No Postmark	
☐	Postmark Illegible	
☐	Received from the House office of Records and Registration	Date of Receipt
☐	Received from the Senate Office of Public Records	Date of Receipt
☐	Other (Specify):	Postmarked _____ and/or Date of Receipt
☐	Electronic Filing	

[illegible]	4-14-98
PREPARER	DATE PREPARED

(4/98)