

**SWEENEY  
DAVIDIAN &  
GREENE LLP**

ATTORNEYS AT LAW

8001 FOLSOM BOULEVARD, SUITE 101  
SACRAMENTO, CALIFORNIA 95826

TELEPHONE (916) 388-5170  
FACSIMILE (916) 388-0357

[www.cdgplusfirm.com](http://www.cdgplusfirm.com)

JAMES F. SWEENEY  
BEN DAVIDIAN  
STEPHEN J. GREENE, JR.  
STEPHEN R. MCCUTCHEON, JR.  
BENJAMIN D. KINNE  
BRIAN T. HILDRETH

October 21, 2004

**Via U.S. Mail**

Mr. Richard I. Klein  
Treasurer  
American Council of Life Insurers PAC  
101 Constitution Ave. NW, Suite 700 West  
Washington, DC 20001

**Re: *Misidentified contributions to Committee for the Preservation of Capitalism***

Dear Mr. Klein:

This law firm represents the California Portland Cement Company Political Action Committee ("CPC-PAC"). During a recent review of contributions made and received by CPC-PAC we discovered that two contributions made by the American Council of Life Insurers Political Action Committee were erroneously reported by you as made to CPC-PAC. We believe the true identity of the recipient of your contributions is the Committee for the Preservation of Capitalism.

As a result of the misreported contributions, the Federal Election Commission ("FEC") Internet website displays CPC-PAC as the recipient of contributions from American Council of Life Insurers PAC. As you know, federal law prohibits separate segregated funds (i.e. company-sponsored PACs) from receiving contributions from outside a narrow classification of individuals, including other PACs.

After speaking with representatives of the FEC, we have determined that because no committee identification number was included on your reports of the contributions, the FEC used the name on the recipient line to identify the recipient. As the attached documents show, you used the name "CPC-PAC" to report the contributions. Because California Portland Cement Company Political Action Committee is the legitimate holder of the "CPC-PAC" designation, the contributions were attributed as received by CPC-PAC, not the Committee for the Preservation of Capitalism.

RECEIVED  
OCT 29 10 58 AM '04  
FEDERAL ELECTION COMMISSION

**SWEENEY, DAVIDIAN & GREENE LLP**

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Letter to Richard J. Klein

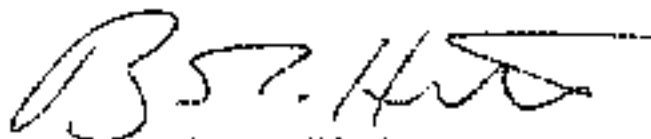
October 21, 2004

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According to FEC representatives, in order to remove CPC-PAC as the designated recipient of your contributions, your period reports must be amended to show either the committee identification number or proper name identification for the Committee for the Preservation of Capitalism. It is critical that this be accomplished as soon as possible. If not, the FEC's website will continue to show what amounts to the making of illegal contributions.

Thank you for your attention to this matter. Please feel free to contact me should you have any questions or require additional information.

Very Truly Yours,



Brian T. Hildreth

BTH:ndb

Enclosures

CC: Renee Benjamin, Esq.  
Corporate Counsel, California Portland Cement Company

Kristin Davis  
Reports Specialist, Federal Election Commission

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:  
(check only one)

PAGE 20 / 20

<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 28d	<input type="checkbox"/> 28e

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the names and addresses of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (or RA):  
American Council of Life Insurers PAC

Full Name (Last, First, Middle Initial) <b>A. AMERIPAC</b>		Transaction ID: D8673 Date of Disbursement: 08 / 17 / 2004
Mailing Address: 409 South Capitol Street, NW Suite 108 City: Washington State: DC Zip Code: 20009		Amount of Each Disbursement This Period: 2500.00
Purpose of Disbursement: Code: AMERIPAC (0000) Candidate Name: _____ Category Type: _____		
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	
State: District		

Full Name (Last, First, Middle Initial) <b>B. Bennett Election Committee</b>		Transaction ID: D8688 Date of Disbursement: 08 / 17 / 2004
Mailing Address: PO Box 77881 City: Washington State: DC Zip Code: 20013		Amount of Each Disbursement This Period: 1000.00
Purpose of Disbursement: Code: _____ Candidate Name: Robert F. Bennett Category Type: _____		
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	
State: UT District: _____		

Full Name (Last, First, Middle Initial) <b>C. CFC-PAC</b>		Transaction ID: D8671 Date of Disbursement: 08 / 19 / 2004
Mailing Address: P.O. Box 22814 City: Alexandria State: VA Zip Code: 22304		Amount of Each Disbursement This Period: 5500.00
Purpose of Disbursement: Code: CFC-PAC (CR) Candidate Name: _____ Category Type: _____		
Office Sought: House Senate President	Disbursement For: Primary General Other (specify) <input type="checkbox"/>	
State: District: _____		

SUBTOTAL of Disbursements This Page (optional) **5500.00**

TOTAL This Period (and also this line number only)

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)  
for each category of the  
debated primary page

FOR LINE NUMBER:  
(check only one)

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<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28	<input type="checkbox"/> 29	<input type="checkbox"/> 30	<input type="checkbox"/> 31	<input type="checkbox"/> 32

All information copied from such Reports and Statements may not be valid or usable for the purpose of assessing candidates 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)  
American Council of Life Insurers PAC

Full Name (Last, First, Middle Initial) A. CPC-PAC		Transaction ID: D9202 Date of Disbursement 08 / 22 / 2005
Mailing Address P.O. Box 22014		Amount of Each Disbursement This Period 2000.00
City Alexandria	State VA	
Zip Code 22304		
Purpose of Disbursement Cont. CPC-PAC (P)		
Candidate Name		Category/ Type
Office Sought: House Senate President	Disbursement For: 2004 Primary General Other (specify) <input checked="" type="checkbox"/>	
State: District	Other	

Full Name (Last, First, Middle Initial) B. Coone for Congress Committee		Transaction ID: D9225 Date of Disbursement 09 / 22 / 2003
Mailing Address 1155 2nd Street, NW Suite 300		Amount of Each Disbursement This Period 1000.00
City Washington	State DC	
Zip Code 20006		
Purpose of Disbursement Cont.		
Candidate Name Philip M. Coone		Category/ Type
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: 2004 <input checked="" type="checkbox"/> Primary General Other (specify) <input type="checkbox"/>	
State: IL	District: 02	

Full Name (Last, First, Middle Initial) C. Craps for US Senate		Transaction ID: D9215 Date of Disbursement 08 / 22 / 2005
Mailing Address P.O. Box 1848		Amount of Each Disbursement This Period 1000.00
City Bismar	State ND	
Zip Code 58701 4848		
Purpose of Disbursement Cont.		
Candidate Name Michael D. Craps		Category/ Type
Office Sought: House <input checked="" type="checkbox"/> Senate President	Disbursement For: 2004 <input checked="" type="checkbox"/> Primary General Other (specify) <input type="checkbox"/>	
State: ND	District: 01	

SUBTOTAL of Disbursements This Page (optional) 4000.00

TOTAL This Period (last page only line number only)

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.

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<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 10-21-04
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	Delivery Confirmation™ Label <input type="checkbox"/>
<input type="checkbox"/> USPS Express Mail	Postmarked
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<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
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<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
<i>Jur</i> PREPARER	10-28-04 DATE PREPARED

(5/2004)