FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Allen L. Peterson, Treasurer
Minnesota Life Insurance Company PAC
400 Robert Street, North
St. Paul, MN 55101

Identification Number: C00120006

NOV 29 2000

Reference: July Quarterly Report (4/01/00-6/30/00)

Dear Mr. Peterson:

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.

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 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Angel L. Williamson

Angel L. Williamson
Reports Analyst
Reports Analysis Division

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20035702546

**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

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

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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)
Minnesota Life Insurance Company PAC

| Full Name, Mailing Address and ZIP Code | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement this Period |
|---|---|---|---|
| A. Kline for Congress<br>PO Box 21632<br>Eagan, MN 55121-0632 | John Kline, House candidate, 6th MN<br>YTD Contributions $1,000.00<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | 04/13/00<br>04/17/00 | $500.00<br>$500.00 |
| B. Runbeck for Congress<br>PO Box 40340<br>St. Paul, MN 55104 | Linda Runbeck, House candidate, 4th MN<br>YTD Contributions $3,000.00<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | 06/20/00 | $2,000.00 |
| C. Rod Grams for US Senate<br>PO Box 1028<br>Anoka, MN 55303 | Rod Grams, Senate candidate, MN<br>YTD Contributions $2,500.00<br>Disbursement for: ☐ Primary ☒ General ☐ Other (specify) | 09/20/00 | $2,500.00 |
| D. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| E. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| F. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| G. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| H. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |
| I. | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |

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| SUBTOTAL of Disbursements This Page (optional) | $5,500.00 |
| TOTAL This Period (last page this line number only) | $5,500.00 |

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**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

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FOR LINE NUMBER 23

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NAME OF COMMITTEE (in Full)
Minnesota Life Insurance Company PAC

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Minge for Congress<br>PO Box 71<br>Granite Falls, MN 56241 | Purpose of Disbursement<br>Contribution<br>YTD Contributions $1,000.00<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year)<br>04/15/99 | Amount of Each Disbursement this Period<br>$1,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>Rod Grams for US Senate<br>PO Box 1029<br>Anoka, MN 55303 | Purpose of Disbursement<br>Contribution<br>YTD Contributions $2,500.00<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year)<br>08/20/99 | Amount of Each Disbursement this Period<br>$2,500.00 |
| C. Full Name, Mailing Address and ZIP Code<br>Gulknecht for Congress<br>1449 12th Avenue NE<br>Rochester, MN 55906 | Purpose of Disbursement<br>Contribution<br>YTD Contributions $1,000.00<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year)<br>08/10/99 | Amount of Each Disbursement this Period<br>$1,000.00 |
| D. Full Name, Mailing Address and ZIP Code<br>Republican Senate House Dinner<br>PO Box 1721<br>Washington, DC 20013 | Purpose of Disbursement<br>Contribution<br>YTD Contributions $10,000.00<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | Date (month, day, year)<br>06/15/99 | Amount of Each Disbursement this Period<br>$10,000.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Contribution<br>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<br>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<br>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<br>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<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement this Period |

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| SUBTOTAL of Disbursements This Page (optional) | $14,500.00 |
| TOTAL This Period (last page this line number only) | $14,500.00 |

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**SCHEDULE B** **ITEMIZED DISBURSEMENTS**

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

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FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)
MINNESOTA MUTUAL LIFE INSURANCE PAC

| | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Rod Grams for Senate<br>P.O. Box 1029<br>Anoka, MN 55303 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 8-11-95 | 2,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>Jim Ramstead Vol Committee<br>8100 Penn Ave S #104<br>Bloomington, MN 55431 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 8-11-95 | 2,000.00 |
| C. Full Name, Mailing Address and ZIP Code<br>Gil Gutknecht Vol Committee<br>1449 12th Ave NE<br>Rochester, MN 55906 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 8-30-95 | 1,200.00 |
| D. Full Name, Mailing Address and ZIP Code<br>Pete Wilson for President<br>1020 12th St Suite 300<br>Sacramento, CA 95814 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 8-30-95 | 1,000.00 |
| E. Full Name, Mailing Address and ZIP Code<br>Earl Pomeroy for Congress<br>P.O. Box 746<br>Bismark, ND 58502 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 9-13-95 | 250.00 |
| F. Full Name, Mailing Address and ZIP Code<br>ALLI LIFE PAC<br>1001 Pennsylvania Ave<br>Washington, DC 20004-2599 | Contribution<br>Disbursement for: [ ] Primary [X] General [ ] Other (specify) | 12-18-95 | 2,000.00 |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>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<br>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<br>Disbursement for: [ ] Primary [ ] General [ ] Other (specify) | Date (month, day, year) | Amount of Each Disbursement This Period |

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| SUBTOTAL of Disbursements This Page (optional) | |
| TOTAL This Period (last page this line number only) | 8,450.00 |

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