



**National
Association of Health**

Underwriters/ Health Underwriters Political Action Committee (HUPAC)

Serving the public by promoting the activities and ethical conduct of insurance professionals
through communication, education and legislative representation

RECEIVED
FEDERAL ELECTION
COMMISSION
REPORTS ANALYSIS
DIVISION

FEB 23 4 19 PM '99

February 23, 1999

Ms. Antoinette Kitchen
Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00283135

Reference: Amendment to 12 Day Pre-General Election Report (10/1/98-10/14/98)

Dear Ms. Kitchen:

Pursuant to your letter dated February 10, 1999 (copy attached), the National Association of Health Underwriters PAC (HUPAC) is responding to your inquiry regarding possible in-kind contributions contained in HUPAC's 12 Day Pre-General Election Report.

I concur with the Commission's preliminary review regarding our disclosure of an in-kind contribution made to the Republican Majority Fund (Senator Nickles' PAC). The contribution in question was to meet luncheon expenses at The Monocle paid for with an American Express card. The Republican Majority Fund received contributions from NAHU members - no direct contribution was made by HUPAC. Accordingly, we have reclassified this expenditure from line 21 (b) to line 23 of the Detailed Summary Page. Please find copies of the Amended 12 Day Pre-General Election Report; the 30 day Post-General Election Report; and the January 31 Year End Report. Per your request, only pages which contain changes have been submitted.

Regarding the payments to Mattax Commercial Photography, the services performed consisted of taking photos of NAHU members with Senator Nickles at the luncheon for inclusion in NAHU's monthly magazine *HU*. Copies were also provided to NAHU members in attendance. The Republican Majority Fund in no way benefited from these costs, and we believe that they are properly stated as line 21 (b) operating expenditures.

Should you have any questions regarding this response, please feel free to contact me directly at 703-276-3800.

Best Regards,

Kevin P. Corcoran
HUPAC Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20563

RQ-2

Kevin Corcoran, Treasurer
National Association of Health
Underwriters PAC (HUPAC)
2000 14th Street Suite 450
Arlington, VA 22201

FEB 10 1999

Identification Number: C00283135

Reference: 12 Day Pre-General Report (10/1/98-10/14/98)

Dear Mr. Corcoran:

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:

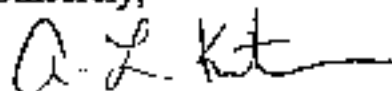
-Your report discloses what appears to be an in-kind contribution made on behalf of Senator Nickles, a federal candidate (pertinent portion(s) attached). The original payments for the goods and services have been disbursed to Martox Commercial Photography as well as American Express, itemized as operating expenditures and included in the total for Line 21 of the Detailed Summary Page.

If the transaction in question is an in-kind contribution, please note that the amount of such activity should be subtracted from Line 21 and added to Line 23 of the Detailed Summary Page. This method of reporting would clarify for the public record the total amount of contributions to federal candidates (including in-kind contributions) by reflecting them on Line 23 of the Detailed Summary Page. However, if this expenditure is not an in-kind contribution, please clarify the nature of the transaction.

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,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen
Reports Analyst
Reports Analyst Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1

FOR LINE NUMBER 21 (b)

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)

Nation Association of Health Underwriters PAC.

AK

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mattox Commercial Photography 5021 Seminary Road Suite 130 Alexandria, VA 22311-2094	Photos/Enlargements for Sen. Nickles Luncheon Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Luncheon Photos	10/14/98 10/1/98	\$140.95 \$269.50
B. Full Name, Mailing Address and ZIP Code American Express P.O. Box 42010 Philadelphia, PA 19162-4201	Sen. Nickles Luncheon at The Monocle Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) Luncheon	10/1/98	\$664.30
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> 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: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$1,074.75

TOTAL This Period (last page this line number only)

\$1,074.75

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.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>2-23-99</i>
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JEM</i> PREPARER	<i>2-24-99</i> DATE PREPARED