FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Robert Fritts, Treasurer
Brooke Holdings Inc. and Jackson
National Life Insurance Company
Separate Segregated Fund
5901 Executive Drive
Lansing, MI 48911

JUN 30 2000

Identification Number: C00254953

Reference: Amended April Monthly Report (3/1/00-3/31/00), received 6/19/00

Dear Mr. Fritts:

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.

Any amendment or clarification should be filed with the Federal Election Commission. 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,

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

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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

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): BROOKE HOLDINGS, INC. and JACKSON NATIONAL LIFE INSURANCE COMPANY SEPARATE SEGREGATED FUND

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. DeGette for Congress P.O. Box 61337 Denver, CO 80206 1st District	Congressional Candidate Disbursement for: [x] Primary [ ] General [ ] Other (specify)	03/07/00	500.00
B. Abraham Senate 2000 P.O. Box 1957 Royal Oak, MI 48068	Senate Candidate Disbursement for: [x] Primary [ ] General [ ] Other (specify)	03/09/00	2,500.00
C. Barcia for Congress P.O. Box 1243 Bay City, MI 48706 5th District	Congressional Candidate Disbursement for: [x] Primary [ ] General [ ] Other (specify)	03/21/00	500.00
D. Dave Camp for Congress 4451 Brookfield Corporate Drive Suite 200 4th District Chantilly, VA 20151	Congressional Candidate Disbursement for: [x] Primary [ ] General [ ] Other (specify)	03/21/00	1,000.00
E.			
F.			
G.			
H.			
I.			

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SUBTOTAL of Disbursements This Page (optional)	4,500.00
TOTAL This Period (last page, see line number only)	4,500.00

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CHEDULE B **ITEMIZED DISBURSEMENTS**

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

PAGE 1 OF 2

FOR LINE NUMBER 23

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NAME OF COMMITTEE (in Full)

Brooke Holdings, Inc. Political Action Committee

Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Dick Chrysler for Congress 8600 Hilton Road Brighton MI 48116	Dick Chrysler-Congressman Michigan Disbursement for: Primary General Other (specify) YTD 4,100.00	1/3/95 5/2/95 6/14/95 6/26/95	1,000.00 2,000.00 100.00 1,000.00
B. Republican Governors Association 310 First Street, SE Washington DC 20003	Purpose of Disbursement Disbursement for: Primary General Other (specify) YTD 5,000.00	1/30/95	5,000.00
C. Romney for Senate Committee P.O. Box 431168 Pontiac MI 48343	Purpose of Disbursement Romney-Senator Michigan Disbursement for: Primary General Other (specify) YTD 1,250.00	2/20/95 6/21/95	500.00 750.00
D. Abraham for Senate Committee 245 Dirksen Senate Bldg Washington DC 20510	Purpose of Disbursement Spence Abraham-Senator Michigan Disbursement for: Primary General Other (specify) YTD 3,000.00	3/20/95 4/20/95	1,000.00 2,000.00
E. Dave Camp for Congress 4th District 137 Cannon Bldg Washington DC 20515	Purpose of Disbursement Dave Camp-Senator Michigan Disbursement for: Primary General Other (specify) YTD 1,000.00	3/21/95 6/14/95	500.00 500.00
F. Levin for Congress Committee US House of Representatives 2230 Rayburn House Office Bldg Washington DC 20510	Purpose of Disbursement Sander Levin-Congressman Michigan Disbursement for: Primary General Other (specify) YTD 500.00	3/21/95	500.00
G. Bliley for Congress 3830 Ingalls Avenue Alexandria VA 22302	Purpose of Disbursement Tom Bliley-Congressman Virginia Disbursement for: Primary General Other (specify) YTD 2,000.00	4/26/95	2,000.00
H. Kildee for Congress Committee P.O. Box 2884 Washington DC 20013	Purpose of Disbursement Dale Kildee-Congressman Michigan Disbursement for: Primary General Other (specify) YTD 500.00	5/31/95	500.00
I. Ehlers for Congress US House of Representatives 1717 Longwurth House Office Bldg Washington DC 20515	Purpose of Disbursement Vern Ehlers-Congressman Michigan Disbursement for: Primary General Other (specify) YTD 500.00	6/14/95	500.00

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SUBTOTAL of Disbursements This Page (optional) 17,850.00

TOTAL This Period (last page this line number only) .....

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