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March 13, 2019

WALTER SKINNER, TREASURER
GUARDIAN LIFE INSURANCE COMPANY OF
AMERICA POLITICAL ACTION COMMITTEE
(GUARDIAN LIFE FEDERAL PAC)
7 HANOVER SQUARE
NEW YORK, NY 10004

Response Due Date 04/17/2019

IDENTIFICATION NUMBER: C00173393

REFERENCE: YEAR-END REPORT (11/27/2018 - 12/31/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in enforcement action. Additional information is needed for the following 2 item(s):

- 1. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
- 2. The totals listed on Line(s) 6(c), 11a(i), 11a(ii), 11a(iii), 11(d), 19 and 20, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to

GUARDIAN LIFE INSURANCE COMPANY OF AMERICA POLITICAL ACTION COMMITTEE (GUARDIAN LIFE FEDERAL PAC)

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taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit http://transition.fec.gov/rad/. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,

Romy Adame-Wilson

Sr. Campaign Finance & Reviewing Analyst

Reports Analysis Division

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