



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Richard Gunderson, Treasurer  
American Council of Life Insurance  
Life Insurance PAC  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004

MAR - 5 1996

Identification Number: C00147066

Reference: Year End Report (12/1/95-12/31/95)

Dear Mr. Gunderson:

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 A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In

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YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Please provide the total(s) for Line 16, Column B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

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) 219-3580.

Sincerely,



Edward H. Ryan  
Reports Analyst  
Reports Analysis Division

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## SCHEDULE A

## ITEMIZED CONTRIBUTIONS

## LIFE INSURANCE PAC

NAME	EMPLOYER	DATE	AMOUNT
Chubb Life PAC PO Box 515 Concord	NH 03302	12/14/95	1000.
		OCCUPATION	
AGGREGATE TO DATE:		4000.	

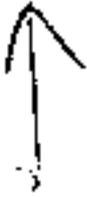
NAME	EMPLOYER	DATE	AMOUNT
Commonwealth Life Ins. PAC PO Box 32830 Louisville	KY 40232	12/14/95	2500.
		OCCUPATION	
AGGREGATE TO DATE:		2500.	<i>500</i>

NAME	EMPLOYER	DATE	AMOUNT
Minnesota Mutual Life PAC 400 N. Robert St. St. Paul	MN 55101	12/27/95	2000.
		OCCUPATION	
AGGREGATE TO DATE:		5000.	

NAME	EMPLOYER	DATE	AMOUNT
National Home Life PAC PO Box 32830 Louisville	KY 40232	12/14/95	2500.
		OCCUPATION	
AGGREGATE TO DATE:		2500.	<i>500</i>

Total this Period 8000.

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