



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

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

MAY 24 2000

Identification Number: C00254953

Reference: November Monthly Report (10/1/99-10/31/99)

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:

-The total listed on Line 11(a)(ii), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Lines 11(a)(iii) and 19, Column A appear to be incorrect. FEC calculations disclose this amount(s) to be \$6,252.47. Please provide the corrected total(s) on the Detailed Summary Page.

-The Summary Page discloses \$29,350 on Line 7, Column B, but the Detailed Summary Page shows on Line 30, Column B total to be \$28,850. These figures should be the same. Please amend your report accordingly.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

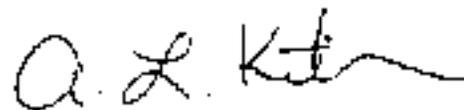
-Please amend Schedule B supporting Line 23 by providing the state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter to reflect this change.

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,



Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		PAGE 1 OF 1	
Contributions from Individuals		Name of Employer or its Successor (If any)		FORM LINE NUMBER	
<small>Any information obtained from such Records and Statements may not be used or made by any person for the purpose of procuring contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such contributors.</small>					
NAME OF COMMITTEE OR FUND National Organization PAC 000000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date Period (See Form 1042-B)	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	
<input type="checkbox"/> Annual Fee <input type="checkbox"/> Periodic <input type="checkbox"/> General		Occupation: Branch Manager		Amount of Each Payment (See Form 1042-B) \$80.00 (\$15 biweekly) 285.00	
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date Period (See Form 1042-B)	
Rodney Jones 221 Mansbury Road City, State ZIP		National Organization, Inc.		payroll deduction	
<input type="checkbox"/> Annual Fee <input type="checkbox"/> Periodic <input type="checkbox"/> General		Occupation: Vice President		Amount of Each Payment (See Form 1042-B) \$120.00 (\$20 biweekly) 360.00	

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor, 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 12 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 18 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

