



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Lawrence R. Maffia, Treasurer
Investment Management Political Action Committee
of the Investment Company Institute (IMPAC)
1401 H Street, NW
Washington, DC 20005

JAN 12 2001

Identification Number: C00105981

Reference: October Monthly Report (9/1/00-9/30/00)

Dear Mr. Maffia:

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:

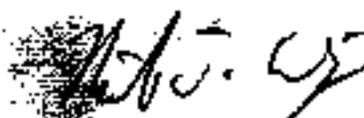
-Your report disclosed a negative disbursement to your connected organization for "In-Kind Contribution, See Line 23"(pertinent portion attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election, except that a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. However, corporate/labor officials or employees may direct subordinates to plan, organize or carry out fundraising as part of their work, using corporate/labor organization resources, only if the corporation or labor organization receives advance payment for the fair market value of the services, including compensation, benefits and overhead. However, using coercion to urge anyone to engage in fundraising on behalf of, or make a contribution to, a candidate or political committee is prohibited. 11 CFR §114.2(f)(2)(i) and (iv)

The Commission notes the disbursement of this amount on Line 23 as an in-kind to a candidate. However, it is also necessary for you to report the "advance payment" of this amount on Line 21(b) to avoid the appearance of a prohibited contribution from your connected organization. If the transaction in question was incompletely or incorrectly disclosed, you

should amend your report with clarifying information. Although the Commission may take further legal action concerning this matter, your prompt action 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,



Nicholas T. Ebinger
Reports Analyst
Reports Analysis Division

SCHEDULE B ITEMIZED DISBURSEMENTSPage 1 of 1
For Line Number: 21b

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 Investment Management PAC of the Investment Company Institute

Name	Purpose :	Date:	Amount :
Investment Company Institute 1401 H St. NW Washington, DC 20005-3148	In-Kind Contribution, See Line 23.	08/30/00	-621.75

Election Type:

UTE

Subtotal of Disbursements This Page
Total This Period

-621.75
-621.75

