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Travelers Group
288 Greenwich Street
New York, NY 10013

**Certified mail,
return receipt requested**

November 15, 1995

Federal Election Commission
Washington, DC 20463
attention: Amy Suzanne Reynolds,
Reports Analyst

Re: Travelers Group Inc. Political Action Committee ('TravPac')
Identification number C00039305

Dear Ms Reynolds:

Daniel E Rubenstein, Treasurer of TravPac, asked me to answer your letter of November 8, 1995, which referred to contributions to Senator Alfonse D'Amato (R-NY) that appeared to exceed legal limits.

\$3,000 of the contributions referenced in your letter were made by Metropolitan Life Insurance Company (MetLife) Employees' Political Participation Fund A ('MetLife PAC'). MetLife PAC is *not* affiliated with TravPac. Contributions made to Senator D'Amato by TravPac and its affiliated committees were therefore within legal limits.

MetLife PAC may have been confused with MetraHealth Associates ['MetraHealth'] Political Participation Fund (MetraHealth PAC). MetraHealth was, until September of this year, owned approximately 48% by Travelers Group Inc. ('Travelers Group') and approximately 48% by MetLife. Travelers Group and MetLife sold their interests in MetraHealth at the end of September 1995.

TravPac had listed MetraHealth PAC in the section 'Name of any Connected Organization or Affiliated Committee' in a Statement of Organization (FEC Form 1) filed May 4, 1995. TravPac had,

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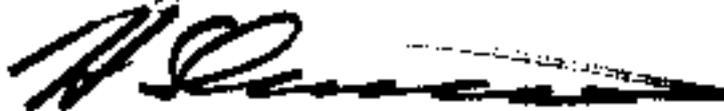
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however, noted that '[MetraHealth PAC] is listed as an affiliated committee purely as a precaution; TravPac does not concede that MetraHealth PAC is an affiliated committee.'

Even if MetraHealth PAC was affiliated with TravPac and/or MetLife PAC, such affiliation would not have made TravPac and MetLife PAC affiliated committees within the meaning of 11 CFR § 100.5(g). (See also Advisory Opinion 1992-17.) We note in particular that Travelers Group has never been a 'parent, subsidiary, branch, division, department, or local unit' of MetLife, and vice-versa.

Please feel free to call me at (212) 816-4962 if you have any questions.

Sincerely,



Howard M Darmstadter
Assistant General Counsel

cc: Daniel E Rubenstein

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