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September 1, 1998

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Elections Commission
999 E Street NW
Washington, DC 20463

Re: July Quarterly Report
Motorists Mutual Insurance Company Civic Fund
Identification Number: C00336834

Dear Mr. Gibson:


This is in response to your inquiry of August 27 concerning the transfer of \$18,859.86 from the Motorists Insurance Civic Fund (MICEF), an Ohio state/local PAC; to the Motorists Mutual Insurance Company Civic Fund (MMICEF). You requested further clarification concerning the source of the funds transferred.

The funds at issue were solicited for and contributed to the state/local PAC (MICEF) in full compliance with Ohio law. All required campaign finance reports were filed on a timely basis with the Ohio Secretary of State's office. We received no inquiries from the Secretary of State concerning these reports. Copies of all campaign finance reports filed with the Ohio Secretary of State's office by the MICEF are available upon request.

In the course of our review of your inquiry, we have determined that all funds contributed to the state/local PAC (MICEF) were also solicited for, contributed and received in compliance with FEC regulations. Solicitations and contributions were limited to corporate executives and administrative personnel, and all contributions were within FEC limits.

I may be contacted at 614-225-8360 if you need additional clarification.

Motorists Mutual Insurance Company Civic Fund


Timothy A. Davison
Custodian of Records

cc: John Bishop
Mike Wiseman
Chuck Gaskill

Federal Election Commission

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