



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mr. Richard Gunderson, Treasurer
American Council of Life Insurance,
Life Insurance PAC
1001 Pennsylvania Ave., N.W.
Washington, DC 20004

MAR - 5 1997

Identification Number: C00147066

Reference: 12 Day Pre-General Report (10/1/96-10/16/96)

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

AMERICAN COUNCIL OF LIFE INSURANCE,
LIFE INSURANCE PAC
PAGE 2

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 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.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are

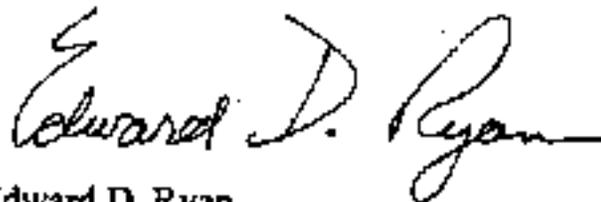
AMERICAN COUNCIL OF LIFE INSURANCE,
LIFE INSURANCE PAC
PAGE 3

received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.2(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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 D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED CONTRIBUTIONS

LIFE INSURANCE PAC

NAME	EMPLOYER	DATE	AMOUNT
Alfa Life Insurance PAC 2108 E. South Blvd Montgomery AL 36116		10/11/96	3000.
	OCCUPATION		<i>ER</i>
	AGGREGATE TO DATE:	3000.	

NAME	EMPLOYER	DATE	AMOUNT
Ameritas Life PAC 5900 O St. Lincoln NE 68510		10/01/96	3000.
	OCCUPATION		
	AGGREGATE TO DATE:	3000.	

NAME	EMPLOYER	DATE	AMOUNT
Jefferson Pilot Life PAC 100 N. Greene St. Greensboro NC 27401		10/01/96	2000.
	OCCUPATION		
	AGGREGATE TO DATE:	5000.	

NAME	EMPLOYER	DATE	AMOUNT
Mutual Trust Life PAC 1200 Joris Blvd Oak Brook IL 60522		10/11/96	2500.
	OCCUPATION		
	AGGREGATE TO DATE:	2500.	

NAME	EMPLOYER	DATE	AMOUNT
Phoenix Mutual Life PAC One American Row Hartford CT 06115		10/01/96	3500.
	OCCUPATION		
	AGGREGATE TO DATE:	5000.	

Schedule B

Itemized Expenditures

Life Insurance PAC

Name	Purpose	Date	Amount
John Hayworth Hayworth for Congress 1023 Longworth Washington, DC 20515	contribution R 6 AZ Aggregate: 2500. Election: G	10/09/96	2500.

Name	Purpose	Date	Amount
Frank LoBiondo LoBiondo Comm. to Change Con 513 Cannon Washington, DC 20515	contribution R 2 NJ Aggregate: 500. Election: G	10/09/96	500.

Name	Purpose	Date	Amount
William Martini Martini for Congress 68 Adams Clifton Terrace, NJ 07013	Contribution R 8 NJ Aggregate: 500. Election: G	10/09/96	500.

Name	Purpose	Date	Amount
Mitch McConnell McConnell Senate Committee 120 Russell Washington, DC 20510	contribution R KY Aggregate: 1000. Election: G	10/09/96	1000.

Name	Purpose	Date	Amount
John Mica Mica for Congress 336 Cannon Washington, DC 20515	contribution R 7 FL Aggregate: 500. Election: G	10/09/96	500.

Name	Purpose	Date	Amount
Guy Millner Guy Millner for US Senate 1730 NE Expressway Atlanta, GA 30329	Contribution R GA Aggregate: 2500. Election: G	10/09/96	2500.

502

Schedule B

Itemized Expenditures

Life Insurance PAC

Name	Purpose	Date	Amount
John Hayworth Hayworth for Congress 1023 Longworth Washington, DC 20515	contribution R 6 AZ Aggregate: 5000. Election: P	07/30/96	3000.

Name	Purpose	Date	Amount
Amo Houghton Friends of Houghton 1110 Longworth Washington, DC 20515	contribution R 31 NY Aggregate: 500. Election: G	07/18/96	500.

Name	Purpose	Date	Amount
James Longley Longley for Congress 226 Cannon Washington, DC 20515	contribution R 1 ME Aggregate: 2500. Election: G	07/23/96	\$ 2500.

Name	Purpose	Date	Amount
Guy Millner Guy Millner for US Senate 1730 NE Expressway Atlanta, GA 30329	Contribution R GA Aggregate: 5000. Election: G	07/23/96	5000. EDR

Name	Purpose	Date	Amount
Bill Paxon Paxon for Congress 1314 Longworth Washington, DC 20515	contribution R 27 NY Aggregate: 4000. Election: G	07/30/96	4000.

Name	Purpose	Date	Amount
Earl Pomeroy Pomeroy for Congress 318 Cannon Washington, DC 20515	contribution D 1 ND Aggregate: 2500. Election: G	07/24/96	2500.

Schedule B

Itemized Expenditures

Page 2 of 12
for Line 23

Life Insurance PAC

Name	Purpose	Date	Amount
Linda Wilde Wilde for Congress 7686 Calle Casino Rancho Cucamong, CA 91730	Contribution R 42 CA Aggregate: 2000. Election: G	10/01/96	2000.

Name	Purpose	Date	Amount
Wayne Allard Team Victory '96 Box 75103 Washington, DC 20013	contribution R CO Aggregate: 5000. Election: G	10/09/96	5000.

Name	Purpose	Date	Amount
Bob Barr Barr Campaign Comm. 1507 Longworth Washington, DC 20515	contribution R 7 GA Aggregate: 500. Election: G	10/09/96	500.

Name	Purpose	Date	Amount
Charles Bass Bass Victory '96 1728 Longworth Washington, DC 20515	contribution R 2 NH Aggregate: 1500. Election: G	10/09/96	1500.

Name	Purpose	Date	Amount
Rudy Boschwitz People for Boschwitz 330 Inland La Plymouth, MN 55447	Contribution R MN Aggregate: 5000. Election: <u>G</u>	10/09/96	5000. 802

Name	Purpose	Date	Amount
Kevin Brady Brady for Congress PO Box 8277 Woodlands, TX 77387	Contribution R 8 TX Aggregate: 1000. Election: G	10/09/96	1000.

Schedule B

Itemized Expenditures

Life Insurance PAC

Name	Purpose	Date	Amount
Cass Ballenger Ballenger for Congress 2238 Rayburn Washington, DC 20515	contribution R 10 NC Aggregate: 500. Election: G	06/27/96	500.

Name	Purpose	Date	Amount
John Barasso Barasso for US Senate , WY	Contribution R WY Aggregate: 1000. Election: P	06/26/96	1000.

Name	Purpose	Date	Amount
Peter Blute Blute for Congress 1029 Longworth Washington, DC 20515	contribution R 3 MA Aggregate: 1000. Election: P	06/27/96	500.

Name	Purpose	Date	Amount
Rudy Boschwitz People for Boschwitz , MN	Contribution R MN Aggregate: 1000. Election: <u>G</u>	06/07/96	1000. <i>EDR</i>

Name	Purpose	Date	Amount
Kevin Brady Brady for Congress , TX	Contribution R 8 TX Aggregate: 1000. Election: P	06/26/96	1000.

Name	Purpose	Date	Amount
Nathan Deal Nathan Deal for Congress 1406 Longworth Washington, DC 20515	contribution R 9 GA Aggregate: 500. Election: P	06/26/96	500.

Schedule B

Itemized Expenditures

Life Insurance PAC

Name	Purpose	Date	Amount
Randy Tate Tate for Congress 1118 Longworth Bldg. Washington, DC 20515	Contribution R 9 WA Aggregate: 3500. Election: G	10/16/96	2500.

Name	Purpose	Date	Amount
Edward Teague Teague for Congress 115 Hallet St. Yarmouth Port, MA 02675	Contribution R 10 MA Aggregate: 1000. Election: G	10/16/96	1000.

Name	Purpose	Date	Amount
Strom Thurmond Re-elect Thurmond 217 Russell Washington, DC 20510	Contribution R SC Aggregate: 5000. Election: G	10/16/96	1672. <i>802</i>

Name	Purpose	Date	Amount
John Warner Sen. Warner Committee 225 Russell Washington, DC 20510	contribution R VA Aggregate: 5000. Election: G	10/16/96	2500.

Name	Purpose	Date	Amount
Sue Wittig Friends of Sue Wittig 459 Kings Hwy Saugerties, NY 12477	Contribution R 26 NY Aggregate: 1000. Election: G	10/16/96	1000.

Total this period 101672.

Schedule B

Itemized Expenditures

Page 3 of 3
for Line 23

Life Insurance PAC

Name	Purpose	Date	Amount
Dale E. Kildee Kildee Committee 2187 Rayburn Washington ,DC 20515	contribution D 9 MI Aggregate: 500. Election: P	07/27/95	500.

Name	Purpose	Date	Amount
Frank LoBiondo LoBiondo Comm. to Change Con 513 Cannon Washington ,DC 20515	contribution R 2 NJ Aggregate: 500. Election: P	07/11/95	500.

Name	Purpose	Date	Amount
David M. McIntosh McIntosh for Congress 1208 Longworth Washington ,DC 20515	contribution R 2 IN Aggregate: 500. Election: P	07/11/95	500.

Name	Purpose	Date	Amount
Lewis F. Payne Lewis Payne for Congress 2412 Rayburn Washington ,DC 20515	contribution D 5 VA Aggregate: 500. Election: P	07/18/95	500.

Name	Purpose	Date	Amount
Bill M. Thomas Bill Thomas Campaign Comm. 2208 Rayburn Washington ,DC 20515	contribution R 21 CA Aggregate: 1000. Election: P	07/11/95	1000.

Name	Purpose	Date	Amount
Strom Thurmond Re-Elect Thurmond 217 Russell Washington ,DC 20510	meal expenses R SC Aggregate: 4328. Election: (G)	07/14/95 in-kind	328. <i>SR</i>

Total this period 10328.

Schedule B

Itemized Expenditures

Page 5 of 6
for Line 23

Life Insurance PAC

Name	Purpose	Date	Amount
Dan Schaefer Schaefer to Congress 2353 Rayburn Washington ,DC 20515	contribution R 6 CO Aggregate: 500. Election: P	06/01/95	500.
Bob Smith Warner-Nickles 1995 Comm. 332 Dirksen Washington ,DC 20510	contribution R NH Aggregate: 3000. Election: P	06/01/95	2000.
Cliff Stearns Friends of Cliff Stearns 2352 Rayburn Washington ,DC 20515	contribution R 6 FL Aggregate: 500. Election: P	06/01/95	500.
Billy Tauzin Billy Tauzin Comm. 2183 Rayburn Washington ,DC 20515	contribution D 3 LA Aggregate: 500. Election: P	06/22/95	500.
Strom Thurmond Re-Elect Thurmond Comm. 217 Russell Washington ,DC 20510	contribution R SC Aggregate: 4000. Election: (G)	06/27/95	599.62 502
Strom Thurmond Occasion Caterers 217 Russell Washington ,DC 20510	meal expenses R SC Aggregate: 3400.38 Election: (G)	06/27/95	3400.38 502

