



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

SEP 6 1995

Identification Number: C00147066

Reference: April Monthly Report (3/1/95-3/31/95)

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) which appears to exceed the limits set forth in the Act. 2 U.S.C. 5441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). 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 granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on

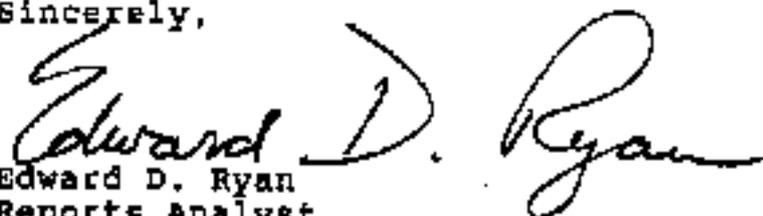
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Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount 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

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SCHEDULE A

ITEMIZED CONTRIBUTIONS

LIFE INSURANCE PAC

NAME	EMPLOYER	DATE	AMOUNT
Mass Mutual PAC 1295 State St. Springfield MA 01111	OCCUPATION	03/15/95	2500.
AGGREGATE TO DATE:		2500.	

NAME	EMPLOYER	DATE	AMOUNT
Minnesota Mutual Life PAC 2385 Apache Ct Mendota Hts MN 55120	OCCUPATION	03/15/95	1500.
AGGREGATE TO DATE:		3000.	

NAME	EMPLOYER	DATE	AMOUNT
Mutual of Omaha Cos. PAC Mutual of Omaha Plaza Omaha NE 68175	OCCUPATION	03/10/95	4000.
AGGREGATE TO DATE:		4000.	<i>EDR</i>

Total this Period 8000.

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SCHEDULE A

ITEMIZED CONTRIBUTIONS

LIFE INSURANCE PAC

NAME	EMPLOYER	DATE	AMOUNT
John Hancock Mutual Life Cos. PO Box 111 Boston MA 02117	OCCUPATION	01/06/95	5000.
AGGREGATE TO DATE:			5000.

NAME	EMPLOYER	DATE	AMOUNT
Minnesota Mutual Life PAC 2385 Apache Ct Mendota Hts MN 55120	OCCUPATION	01/06/95	1500.
AGGREGATE TO DATE:			1500.

NAME	EMPLOYER	DATE	AMOUNT
Mutual of Omaha Cos. PAC Mutual of Omaha Plaza Omaha NE 68175	OCCUPATION	01/06/95	2000.
AGGREGATE TO DATE:			2000.

Total this Period 8500.

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