

RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 13, 2004

Mark Pavlik, Treasurer  
Great-West Life & Annuity Insurance  
Company Political Action Committee  
8525 E. Orchard Road, 2T3  
Greenwood Village, CO 80111

**Response Due Date:**  
November 12, 2004

Identification Number: C00263723

Reference: July Quarterly Report (4/1/04-6/30/04)

Dear Mr. Pavlik:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

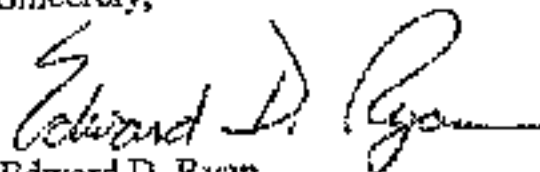
-Schedule B supporting Lines 22 and 23 disclosed \$20,000 in disbursements to the Great-West Life & Annuity Insurance Company Political Action Committee for "Tickets to Presidents Annual Dinner and a PAC to PAC contribution". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23 or independent expenditures on Schedule E supporting Line 24. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1144.

Sincerely,



Edward D. Ryan  
Campaign Finance Analyst  
Reports Analysis Division

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