FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

August 27, 1998

Robert Fritts, Treasurer
Brooke Holdings Inc. and Jackson
National Life Insurance Company
Separate Segregated Fund
5901 Executive Drive
Lansing, MI 48911

Identification Number: C00254953

Reference: April Monthly Report (3/1/98-3/31/98)

Dear Mr. Fritts:

This letter is to inform you that as of August 26, 1998, the Commission has not received your response to our request for additional information, dated August 5, 1998. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Richard Ng on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

AUG 5 1998

Robert Fritts, Treasurer
Brooke Holdings Inc. and Jackson
National Life Insurance Company
Separate Segregated Fund
5901 Executive Drive
Lansing, MI 48911

Identification Number: C00254953

Reference: April Monthly Report (3/1/98-3/31/98)

Dear Mr. Fritts:

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 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 and its affiliates 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 recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are

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 §110.1(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) 694-1130.

Sincerely,

Jennifer K. Wall

Jennifer K. Wall
Reports Analyst
Reports Analysis Division

97031884682

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

BROOKE HOLDINGS, INC. - Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Knollenberg for Congress 27877 Orchard Lake Road Farmington Hills, MI 48334	Knollenberg/Congress Disbursement for: Primary General Other (specify) YTD $1,000.00	01/13/97	1,000.00
B.	Disbursement for: Primary General Other (specify)		
C.	Disbursement for: Primary General Other (specify)		
D.	Disbursement for: Primary General Other (specify)		
E.	Disbursement for: Primary General Other (specify)		
F.	Disbursement for: Primary General Other (specify)		
G.	Disbursement for: Primary General Other (specify)		
H.	Disbursement for: Primary General Other (specify)		
I.	Disbursement for: Primary General Other (specify)		

SUBTOTAL of Disbursements This Page (optional) 1,000.00

TOTAL This Period (last page this line number only) 1,000.00

FE6AN132

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Brooke Holdings, Inc., Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Condit for Congress 44 Canal Center Plaza #400 Alexandria VA 22314	Disbursement for: Primary General Other (specify)	3/20/97	$500.00
B. Knollenberg for Congress 27877 Orchard Lake Road Farmington Hills MI 48334	Disbursement for: Primary General Other (specify)	3/20/97	$4,000.00
C. Citizens for Geake - FEDERAL ACCOUNT PO Box 5298 Northville MI 48167	Disbursement for: Primary General Other (specify)	3/20/97	$300.00
D. Upton for All of Us PO Box 490 St. Joseph MI 49085	Disbursement for: Primary General Other (specify)	3/20	$500.00
E. Camp for Congress PO Box 423 Midland MI 48640	Disbursement for: Primary General Other (specify)	3/20/97	$500.00
F.	Disbursement for: Primary General Other (specify)		
G.	Disbursement for: Primary General Other (specify)		
H.	Disbursement for: Primary General Other (specify)		
I.	Disbursement for: Primary General Other (specify)		

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) $5,800.00

FE3AN135

SCHEDULE B — **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1

FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full): BROOKE HOLDINGS, INC. and JACKSON NATIONAL LIFE INSURANCE COMPANY, SEPARATE SEGREGATED ACCOUNT

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. KNOLLENBERG FOR CONGRESS 27867 Orchard Lake Road Farmington Hills, MI 48334	Congressional Candidate Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	03/02/98	$5,000.00
B. STABENOW FOR CONGRESS P.O. Box 4945 East Lansing, MI 48823	Congressional Candidate Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	03/02/98	2,500.00
C. EHLERS FOR CONGRESS 4451 Brookfield Corporate Drive Chantilly, VA 20151-1652	Congressional Candidate Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	03/09/98	500.00
D. BOB BARR FOR CONGRESS P.O. Box 4323 Marietta, GA 30061-4323	Congressional Candidate Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	03/16/98	250.00
E. STUPAK FOR CONGRESS P.O. Box 143, 817 9th Ave. Menominee, MI 49858	Congressional Candidate Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	03/30/98	500.00
F.	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G.	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H.	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I.	Purpose of Disbursement Disbursement for: [ ] Primary [ ] General [ ] Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 8,750.00

TOTAL This Period (last page this line number only) .....

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