



2901 Telestar Court  
Falls Church, VA  
22042-1205  
www.naifa.org

703/770-0100

**NATIONAL ASSOCIATION OF  
INSURANCE AND FINANCIAL ADVISORS**

RECEIVED  
FEC MAIL ROOM

2000 JUN 22 P 2:07

June 20, 2000

Antoinette Kitchen  
Reports Analyst  
Reports Analyst Division  
Federal Election Commission  
Washington, DC 20463

Dear Ms. Kitchen:

This letter is in response to your letter dated June 9, 2000 regarding contributions reported to the FEC by the Democratic Senatorial Campaign Committee (copy of letter attached). The DSSC had listed the National Association of Life Underwriters PAC as a contributor. As we reported to the FEC in October 1999, the National Association of Life Underwriters PAC has changed its name to the National Association of Insurance and Financial Advisors PAC. It appears that the DSSC has not updated its records to indicate the correct source of funds.

The National Association of Insurance and Financial Advisors PAC is registered with the FEC and has been filing reports as required by the FEC. I hope this clarifies the confusion. Please contact me at (703) 770-8100 if you need more information.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Madden". The signature is written in a cursive style.

Kevin M. Madden  
Vice President- Finance & Administration



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-F

Treasurer  
National Association of Life  
Underwriters PAC  
1922 F Street, NW  
Washington, DC 20006

JUN 9 2000

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include 1) any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year or 2) any separate segregated fund established by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock which solicits contributions or makes expenditures for the purpose of influencing federal elections. 2 U.S.C. §§431(4) and 441b

A review of the receipts reported by the Democratic Senatorial Campaign Committee indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 2000 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. See 2 U.S.C. §431(9). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (relevant informational materials and forms are enclosed);  
or
- 2) receive a full contribution refund or direct the recipient committee(s)

to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date of this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

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Enclosures

**SCHEDULE A**

**ITEMIZED RECEIPTS**

20000141799

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

PAGE	OF
6	8
FOR LINE NUMBER	
11C	

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  
Democratic Senators Campaign Committee

**AK**

FULL NAME, MAILING ADDRESS & ZIP CODE National Association of Life Underwriters PAC 1822 F Street, NW Washington, DC 20005	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/28/00	\$15,000.00
	AGGREGATE YEAR-TO-DATE →	\$15,000	
FULL NAME, MAILING ADDRESS & ZIP CODE National Association of Realtors PAC 700 11th Street, NW Washington, DC 20001	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/23/00	\$15,000.00
	AGGREGATE YEAR-TO-DATE →	\$15,000	
FULL NAME, MAILING ADDRESS & ZIP CODE National Cattlemen's Beef Association PAC 1301 Pennsylvania Avenue, N.W. Suite 300 Washington, DC 20005	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/20/00	\$5,000.00
	AGGREGATE YEAR-TO-DATE →	\$5,000	
FULL NAME, MAILING ADDRESS & ZIP CODE National Rural Electric Cooperative Association- Action for Rural Electrification PAC 4301 Wilson Blvd. Arlington, VA 22203	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/01/00	\$5,000.00
	AGGREGATE YEAR-TO-DATE →	\$5,000	
FULL NAME, MAILING ADDRESS & ZIP CODE National Venture Capital Association PAC (NYCAPAC) 1855 N. Fort Meyer Suite 1700 Arlington, VA 22209	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/24/00	\$5,000.00
	AGGREGATE YEAR-TO-DATE →	\$5,000	
FULL NAME, MAILING ADDRESS & ZIP CODE New York Life Insurance PAC 1001 Pennsylvania Ave, NW Suite 480 Washington, DC 20004	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/09/00	\$15,000.00
	AGGREGATE YEAR-TO-DATE →	\$15,000	
FULL NAME, MAILING ADDRESS & ZIP CODE Osteopathic PAC 5301 Wisconsin Ave., NW No. 630 Washington, DC 20015	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/06/00	\$5,000.00
	AGGREGATE YEAR-TO-DATE →	\$5,000	
FULL NAME, MAILING ADDRESS & ZIP CODE Phoenix Mutual Life Insurance Co. PAC 1 American Row 11th Floor Hartford, CT 06113	NAME OF EMPLOYER	DATE	AMOUNT
	OCCUPATION	03/01/00	\$5,000.00
	AGGREGATE YEAR-TO-DATE →	\$5,000	

\$70,000.00

**SUBTOTAL** of Receipts This Page .....

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

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE  
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> First Class Mail	POSTMARKED 6-20-00
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other ( Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
<i>JMP</i> PREPARER	6-20-00 DATE PREPARED