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WRITER'S DIRECT NUMBER

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February 16, 1993

Mr. Stephen M. Cohen
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Cohen:

This letter responds to your letter to Robert H. Katz, Treasurer of NALC-PAC (Identification Number: C00145474). We are counsel to American Council of Life Insurance Political Action Committee ("LIFE PAC"). On January 1, 1993, the National Association of Life Companies was merged into American Council of Life Insurance. As a result, NALC-PAC and LIFE PAC "affiliated" political committees on that date. Thereafter, on January 14, 1993, NALC-PAC transferred all of its remaining funds ($54,119.28) to LIFE PAC and filed a termination report.

Because transfers of funds may be made without limit between affiliated committees (11 C.F.R. § 102.6(a)), the transfer from NALC-PAC to LIFE PAC did not violate the contribution limits. This letter also should serve as an amendment to the Statement of Organization of NALC-PAC to indicate that it was affiliated with LIFE PAC prior to its termination.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,

Michael A. Nemeroff

cc: Robert H. Katz

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

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