



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 5 2000

Lawrence R. Maffia, Treasurer
Investment Management Political Action Cmte
of the Investment Company Institute (IMPAC)
1401 H Street NW Suite 1200
Washington, DC 20005

Identification Number: C00105981

Reference: November Monthly Report (10/1/99-10/31/99)

Dear Mr. Maffia:

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) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your

committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). 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 receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts 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,

A handwritten signature in dark ink, appearing to read "Kenneth A. Davis, Jr.", with a stylized, cursive script.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE A**ITEMIZED RECEIPTS**

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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: Investment Management PAC of the Investment Company Institute

Name	Name of Employer	Date	Amount
The Drayfus Corporation PAC 767 Fifth Avenue New York, NY 10153	N/A Occupation N/A	10/05/99	5,000.00
Aggregate Year-to-Date —>			\$5,000.00

Name	Name of Employer	Date	Amount
SAFE-PAC Safeco Plaza Tax Dept. T-16 Seattle, WA 98185	N/A Occupation N/A	10/14/99	5,000.00
Aggregate Year-to-Date —>			\$5,000.00

Name	Name of Employer	Date	Amount
Legg Mason PAC 7 East Redwood Street Baltimore, MD 21203	N/A Occupation N/A	10/28/99	3,000.00
Aggregate Year-to-Date —>			\$3,000.00

Name	Name of Employer	Date	Amount
Chase Manhattan Corp. for Good Govt. 270 Park Avenue New York, NY 10017	N/A Occupation N/A	10/28/99	2,500.00
Aggregate Year-to-Date —>			\$2,500.00

Subtotal of Receipts this page	15,500.00
Total this period	15,500.00

