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NAME OF COMMITTEE (In Full)
American Mid-Sized Banks (AMSB) Political Action Committee

FEC IDENTIFICATION NUMBER
C00501015

Mailing Address 555 South Flower Street
12th Floor

City State ZIP Code
Los Angeles CA 90071

June 3, 2020

Mr. Nicholas Tarone
Senior Campaign Finance Analyst, FEC

Dear Mr. Tarone,

This letter responds to the request for additional information that you sent the American Mid-Sized Banks (AMSB) Political Action Committee, FEC ID C00501015 ('the Committee') on May 5, 2020 regarding the Committee's amended year-end report for 2019. You specifically asked that the Committee 'provide clarifying information' about the Committee's disclosure of 'an increase in receipts totaling \$15,000 from the amounts disclosed on your original report.'

The Committee respectfully submits the following explanation and outlines steps it is taking to prevent similar issues in the future. When the Committee filed its year-end report covering July 1, 2019 to December 31, 2019, the report did not include certain checks that had been received by mail, but not opened at the time when the report was filed. These included the following contributions: (1) \$5,000 from People's United Bank Federal PAC dated November 8, 2019; (2) \$5,000 from Commerce Bancshares Inc. PAC dated December 17, 2019; and (3) \$5,000 from Bok Financial Corp PAC dated December 18, 2019. A similar issue involving unopened checks received by mail occurred with the mid-year report filed on July 25, 2019 covering January 1, 2019 to June 30, 2019, which the Committee amended to reflect an aggregate total of \$6,010.00 from the Alliance of Bankers of Wisconsin (ABW), including several individual contributions dated June 14, 2019. (Although the FEC only asked about the \$15,000 amendment to the year-end report, the Committee is providing clarifying information with respect to both amendments in the interest of full disclosure.)

The relevant contributions were reflected on the two FEC reports in question because they were not deposited in the Committee's account until January 22, 2020. The Committee recognizes that 11 C.F.R. ? 103.3(a) requires that '[a]ll deposits shall be made within 10 days of the treasurer's receipt.' In this case, I am the Treasurer and frequently travel in connection with my work for the Coalition of Mid-Sized Banks, which is a trade association that represents more than 100 banks across the country. This caused delay in the receipt and deposit of the contributions because the mail in Los Angeles was not being checked and opened on a regular basis while I was on the road.

When the Committee began preparing its first quarterly report for 2020, it identified the fact that the checks in question were from 2019. The Committee wishes to be fully transparent so amended the relevant FEC reports on April 15th and 16th. The root cause of this issue was that I was the only person staffing the Committee at the time. In order to address this, the Committee has hired additional personnel. This corrective action is reflected in the amendment to the Committee's registration that was filed on May 13, 2020, which lists Kyler Bishop as Assistant Treasurer. In this role, Mr. Bishop will have responsibility for depositing checks within ten days of when they arrive by mail. This will be done by checking the Committee's mailbox at least once a week and photocopying the contribution envelope to record the postmark date. He also will assist with recordkeeping and preparation of reports.

In addition, the Committee is in the process of defining the specific roles and responsibilities of the Treasurer and Assistant Treasurer through the adoption of a more formal compliance policy. This Campaign Finance Policy ('the Policy') also will facilitate the Committee's compliance with other requirements of the FEC regulations and the Federal Election Campaign Act. It will set out procedures and instructions for fulfilling the applicable legal requirements and include compliance best practices.

The Committee understands the seriousness of these issues and is committed to implementing improved controls to help avoid recurrences.

Sincerely,

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Brent Tjarks,
Treasurer