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COMMISSION MAIL ROOM
**PORTER, WRIGHT,
MORRIS & ARTHUR**
Attorneys & Counselors at Law

APR 8 1 10 PM '98

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JOHN C. HARTRAUFT
614-227-2143

jhartauf@porterwright.com

April 6, 1998

Scott Francis, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: Huntington Bancshares Incorporated Political
Action Committee, C00165589 (HBI-PAC)

Dear Mr. Francis:

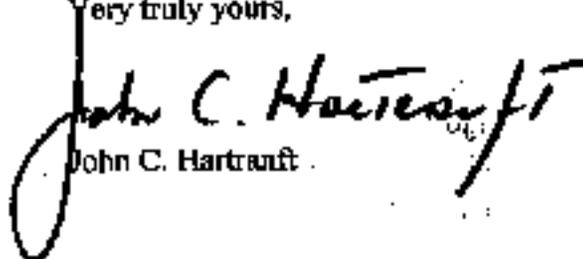
Your undated letter received by Pamela Archer, Assistant Treasurer of HBI-PAC, on March 25, 1998, has been referred to me for response.

A review of HBI-PAC's records does indicate that an inadvertent violation of the contribution limitation prescribed by 2 U.S.C. §441a(a)(2) did occur in connection with contributions to the George Voinovich for Senate Committee. It appears this violation occurred as a result of an oversight by the former treasurer for HBI-PAC and not as the result of the failure of HBI-PAC to have in place safeguards to ensure compliance with §441a and other relevant statutes and regulations.

In accordance with your instructions, HBI-PAC has requested that its excess contribution be redesignated by the George Voinovich for Senate Committee to the general election in accordance with 11 C.R.F. §110.2. A copy of Ms. Archer's letter to the Committee is enclosed.

I trust that HBI-PAC's prompt resolution of this inadvertent error will preclude the need for further action on your part. However, if you or the commission should have any further questions or concerns, please contact me and I will endeavor to address them immediately.

Very truly yours,


John C. Harttrauft

JCH/jd

cc: Rich Zartoch, President HBI-PAC
Pamela Archer, Assistant Treasurer HBI-PAC
John W. Liebersbach, Esquire

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RECEIVED
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HUNTINGTON BANCSHARES INCORPORATED
POLITICAL ACTION COMMITTEE

Pamela Archer, Assistant Treasurer
Direct Dial Number:
614-490-4677

41 South High Street
Post Office Box 1558
Columbus, Ohio 43215-6194

APR 8 1 10 PM '98

April 2, 1998

Voinovich For Senate Committee
25201 Chagrin Blvd., Suite 200
Beechwood, Ohio 44122

RE: Contributions From The Huntington Bancshares
Incorporated Political Action Committee ("HBI-PAC")

Dear Sir or Madam:

On March 25, 1998, The Huntington Bancshares Political Action Committee ("HBI-PAC") received notice from the Federal Election Commission that it appeared HBI-PAC had exceeded the campaign contribution limitations as prescribed by 2 U.S.C. §441a(a)(2) in its contributions to the George Voinovich for Senate Committee. A copy of that notice is enclosed for your information.

A review of HBI-PAC's reports indicate the following contributions were made by it to the Voinovich For Senate Committee:

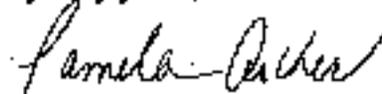
	<u>DATE</u>	<u>AMOUNT</u>
1.	7/24/96	\$1,720.00
2.	1/22/97	\$3,280.00
3.	7/2/97	\$ 762.00
4.	7/9/97	\$ 592.21

The total amount of contributions given to the campaign for the primary election is \$6,354.21. Thus it appears that HBI-PAC has inadvertently exceeded the statutory limit by \$1,354.21.

In order to correct this inadvertent error, HBI-PAC would ask that the sum of \$1,354.21 of its contributions be redesignated pursuant to 11 CFR §110.2(b) as contributions to the general election campaign rather than the primary campaign. We would ask that you amend your records accordingly.

Thank you in advance for your cooperation.

Very truly yours,



Pamela Archer, Assistant Treasurer

cc: Scott Francis, Federal Election Commission
Rich Zarnoch, President HBI-PAC
John W. Liebersbach, Esquire
John C. Hartranft, Esquire



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 25 1998

Pamela Anchor, Treasurer
Huntington Bancshares Incorporated
Political Action Committee
41 South High Street
Columbus, OH 43215

Identification Number: C00165589

Reference: Year End Report (7/1/97-12/31/97)

Dear Ms. Anchor:

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).

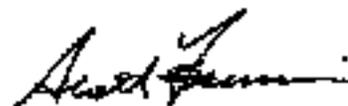
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A

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,



Scott Francis
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 22 OF 23
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 pollster submitted to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

The Huntington Bancshares Incorporated Political Action Committee (HBI-PAC)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Huntington National Bank 41 S. High Street Columbus, Ohio 43215	Reception for George V. Voinovich for Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-2-97	\$762.00
B. Full Name, Mailing Address and ZIP Code Printing Plus, Inc. 7465 Worthington-Galena Road Columbus, Ohio	Printing of invitations for Voinovich reception Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-9-97	592.21
C. Full Name, Mailing Address and ZIP Code Citizens for Kasich 865 Macon Alley Columbus, Ohio 43206	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-2-97	1,000.00
D. Full Name, Mailing Address and ZIP Code Pryce for Congress 340 E. Gay Street Columbus, Ohio 43215	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-17-97	1,000.00
E. Full Name, Mailing Address and ZIP Code Friends of Congressman Ney aka Bob Ney for Congress P.O. Box 490 St. Clairsville, OH 43950	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-26-97	500.00
F. Full Name, Mailing Address and ZIP Code Hollister for Congress Committee 107 Iroquois Drive Marietta, Ohio 45750	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-28-97	1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

4,853.21

TOTAL This Period (last page this line number only)

4,853.21

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 4-6-98
<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>JEM</i>	 4-9-98
PREPARER	DATE PREPARED