



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 3, 2014

RICK CLAYBURGH, TREASURER
NORTH DAKOTA BANKERS ASSOCIATION
POLITICAL ACTION COMMITTEE
122 E MAIN AVENUE, SUITE 201
BISMARCK, ND 58501

Response Due Date
05/08/2014

IDENTIFICATION NUMBER: C00117911

REFERENCE: YEAR-END REPORT (01/01/2013 - 12/31/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

1. Schedule B supporting Line 22 discloses a disbursement to a non-federal account (see attached). You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of these disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. (11 CFR §§104.3(b)(3) and 106.1)

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

- It has come to the attention of the Federal Election Commission that the reports you have filed during the current election cycle do not reflect the appropriate coverage dates for quarterly filing status. Please be advised of the filing dates and coverage periods for the 2013-2014 election cycle and fill in the appropriate dates on Line 5 of the Summary Page. For your information and

NORTH DAKOTA BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE

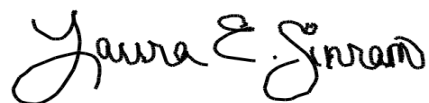
Page 2 of 2

consideration when preparing future filing, refer to the schedule provided for your next filing. (U.S.C. 434(a) and 11 CFR §104.5(c))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
North Dakota Bankers Association Political Action Committee (C00117911)

Clarify Transfer to Nonfederal Account

Recipient Name	Date	Amount	Report
NORTH DAKOTA BANKERS ASSOCIATION PAC - STATE	12/13/13	\$5,000	2013 Year End

2013-2014 Coverage Periods and Filing Dates - Quarterly Filers

Report Type	Coverage Type	Due Dates
Mid-Year	1/1/13-6/30/13	July 31, 2013
Year-End	7/1/13-12/31/13	January 31, 2014
April Quarterly	1/1/14-3/31/14	April 15, 2014
July Quarterly	4/1/14-6/30/14	July 15, 2014
October Quarterly	7/1/14-9/30/14	October 15, 2014
12 Day Pre-General	10/1/14-10/15/14	October 23, 2014
30 Day Post-General	10/16/14-11/24/14	December 4, 2014
Year-End	11/25/14-12/31/14	January 31, 2015