



WISCONSIN
BANKERS
ASSOCIATION

FEB 6 1 03 PM '95

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February 3, 1995

Mr. Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00048181

Reference: Year End (7/1/93 - 12/31/93) and
October Quarterly (7/1/94 - 9/30/94) Reports

Dear Mr. Dodson:

I am in receipt of your letter dated January 25, 1995 regarding the reports referenced above filed by the Wisconsin Bankers Association Political Action Committee, Inc. (Wisbankpac).

During 1993, the Treasurer for Wisbankpac understood that the Banc One Wisconsin Corporation PAC became a state-registered only PAC. From that point forward, the Treasurer was aware that all future contributions from Banc One Wisconsin Corp. PAC to Wisbankpac were to be used for the purposes of state campaigns only. At no time were these monies from Banc One Wisconsin Corp. PAC used by Wisbankpac to influence federal elections.

While the Treasurer used all contributions received for permissible purposes under state and federal election laws respectively, the Treasurer was unaware that it was important to maintain physically separate accounts. This was true particularly since Banc One Wisconsin Corp. PAC was the only contributor to Wisbankpac that could not provide it with money to be used to influence federal elections.

The fact that these monies from Banc One Wisconsin Corp. PAC were used to influence only state elections is further evidenced by the timing of Wisbankpac's contributions to federal campaigns. In 1993, Wisbankpac made its large federal expenditure of \$18,838.00 on July 9, 1993. This contribution occurred twenty-nine days before Wisbankpac received the \$3,500 contribution from Banc One Wisconsin Corp. PAC on August 7, 1993. Also in 1993, Wisbankpac made a final federal contribution to Friends and Neighbors of Steve Gunderson not using Banc One Wisconsin Corp. PAC funds. In 1994, Wisbankpac made a \$10,800 contribution to ABA BankPac fourteen days before it received the \$4,000 contribution from Banc One Wisconsin Corp. PAC on July 21, 1994. Again, there was only one more federal contribution made in 1994 after July 21, 1994 and that contribution was \$750 to Neuman for Congress '94 on November 2, 1994. None of that money was from Banc One Wisconsin Corp. PAC's contribution to Wisbankpac.

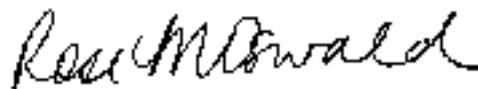
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As you can see, the Treasurer has consistently used contributions from Banc One Wisconsin Corp. PAC to influence state elections only over the last two years. Prospectively, however, to ensure that there is no confusion and no chance of these monies being used for impermissible purposes, current Treasurer Barbara Brink has now created two separate checking accounts for Wisbankpac. One account, number 10006-01871, is titled "Wisbankpac, Inc., State Account," and the other account, number 10006-01863, is titled "Wisbankpac Inc., Federal Account."

Finally, we are informing, by a copy of this letter, Banc One Wisconsin Corp. PAC that the above action was taken. Contributions from that organization in the future should be made payable to "Wisbankpac Inc. State Account" and will be deposited only into the state account.

I assume the above response is sufficient to satisfy concerns raised by you in your letter.

Sincerely,



Rose M. Oswald
Associate Director - Legal

RMO:ajw

cc: Susanne A. Schilke, Treasurer
Banc One Wisconsin Corp. PAC

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