

**KBA**

DEC 12 11 54 AM '94

December 9, 1994

Mr. Edward D. Ryan  
Reports Analyst  
Reports Analyst Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Mr. Ryan:

This is in response to your letter regarding the Kentucky Bankers Political Action Committee's quarterly report dated 10/31/94.

Regarding the disbursement of \$328.59 to the Kentucky Bankers Association for reimbursement of expenses -- these were normal operating expenditures (postage and printing of brochures). These brochures are mailed to our members for solicitation of contributions from them to the KBPAC. None of the \$328.59 was used to influence a federal election.

We now realize that the connected organization may pay for these administrative costs without having to be reimbursed by the KBPAC and the administrative expenses will be handled that way in the future. At anytime that the Association wishes the KBPAC to help with these expenses, the KBPAC will make a prepayment to the Association and will be reported accordingly.

We appreciate your help in explaining this ruling to us and if you have any further questions, please feel free to contact me.

Sincerely,



Larry D. Lander  
Treasurer  
Kentucky Bankers Political Action Committee

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

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Larry D. Lander, Treasurer  
Kentucky Bankers Political Action  
Committee  
One Riverfront Plaza, Suite 500  
Louisville, KY 40202

Identification Number: C00062835

Reference: Amended October Quarterly Report (7/1/94-9/30/94)  
dated 10/31/94

Dear Mr. Lander:

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:

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from other political committees (such as PACs) should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Schedule B of your report discloses a \$328.59 payment to your connected organization for reimbursement of expenses (pertinent portion(s) attached). 2 U.S.C. §441b prohibits a corporation or labor organization from contributing or expending funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund.

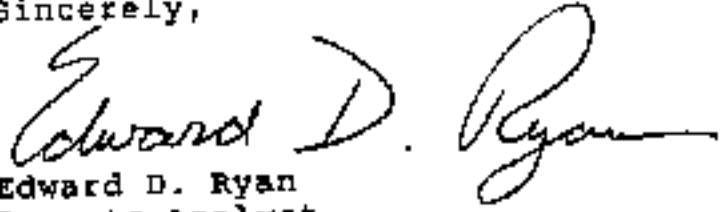
Please amend your report to clarify whether the payment to your connected organization was for expenditures which were intended to influence federal elections and provide the dates of the activity conducted by your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel

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free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE B**

**FINANCIAL STATEMENTS**

THIS REPORT IS PREPARED BY THE CANDIDATE OR PARTY AND IS NOT SUBJECT TO THE FEDERAL CAMPAIGN FINANCE LAWS.  
 PAGE 1 OF 1  
 PERIOD 1/1/94 - 12/31/94

Any information reported from bank papers and statements may not be used or used by any person for the purpose of making contributions or for campaign purposes, other than using the name and address of any political committee to which contributions were such committee.

**NAME OF CANDIDATE OR PARTY**  
**KENTUCKY BARBERS POLITICAL ACTION COMMITTEE**

Page

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kentucky Barbers' Committee for State Government Suite 500, One Riverfront Plaza Louisville, KY 40202	Transfer of funds Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/23/94	9,000.00
Kentucky Barbers Association Suite 500, One Riverfront Plaza Louisville, KY 40202	Reimbursement of expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/30/94	328.59
C. 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
D. 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
E. 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
F. 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
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 (add rows)**

**TOTAL This Period (add page Totals - a number only)**

3,328.59

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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.

Hand Delivered

DATE OF RECEIPT

First Class Mail

POSTMARKED

12-9-94

Registered/Certified Mail

POSTMARKED

No Postmark

Postmark Illegible

Received from the House Office of Records  
and Registration

DATE OF RECEIPT

Received from the Senate Office of Public  
Records

DATE OF RECEIPT

Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

*lky.*  
PREPARER

12-13-94  
DATE PREPARED

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