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**NYBA**

New York Bankers Association

99 Park Avenue

New York, NY 10016-1502

212.297.1635 Fax 212.297.1622

kjannetty@nyba.com

**Karen L. Jannetty**  
Director of Public Relations &  
Political Action

March 17, 2006

Ms. Jennifer Thangavelu  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Dear Ms. Thangavelu:

Identification number: C00098301

Reference: New York Bankers Association Community Political Action  
Committee  
Mid-Year Report (1/01/05 – 6/30/05)

This letter is in response to your inquiry of February 17, 2006. Please be advised that, as evidenced by its most recent filings, the above-referenced political action committee has only recently come under the management of the New York Bankers Association (NYBA) as the result of our combination with the Community Bankers Association of New York State (CBANYS). (This political action committee is the renamed entity that was known as CBANYS PAC, and was managed by CBANYS, until January 2006.) NYBA is currently in the process of winding down CBANYS' operations, after which CBANYS will be dissolved.

As NYBA has no personal knowledge related to the events surrounding your inquiry, the information I am presenting is based only on "information and belief." In light of your inquiry, however, NYBA is undertaking a comprehensive review of the CBANYS PAC. We will let you know when that review is complete.

Marriott Check

The Mid-Year Report appears to show a contribution from Marriott Corporation to CBANYS-PAC in the amount of \$4,140.00. The CBANYS-PAC's treasurer incorrectly reported these funds as a corporate contribution. In reality, these funds represented cash raised by the PAC at its connected organization's annual convention, which took place at an out-of-state Marriott hotel. In the interest of safety, the CBANYS PAC asked the Hotel to convert its cash into a check, as a more secure method of transporting the funds back to New York.

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We have been assured that none of the cash contributions exceeded \$200 from any individual. Therefore, our amended report will show these funds in the unitemized contributions line.

America's Community Bankers PAC

The Mid-Year Report also shows \$7,000.00 contributed from CBANYS PAC to their affiliated committee, America's Community Bankers Community Campaign Committee. The funds were reported incorrectly on line 23. The funds were actually a transfer to an affiliated committee, and should have been reported on line 22. The recipient, America's Community Bankers Community Campaign Committee, correctly reported the amount as a transfer on line 21 and on Schedule A (page 14) of its monthly report for April 2005.

Our amended report will show a \$7,000.00 transfer to America's Community Bankers Community Campaign Committee on line 22, as well as the appropriately amended Schedules A and B.

Please do not hesitate to contact me with any further questions.

Sincerely,



Karen L. Jannetty  
Treasurer

New York Bankers Association Community Political Action Committee

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Federal Election Commission  
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