

OBA★Elect
"It's Our Future"

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2001 SEP 27 P 2:03

September 24, 2001

Thomas F. Maxwell, III
Reports Analyst, Reports Analysis Division
Federal Election Commission
999 F. Street, N.W.
Washington, D.C. 20463

Dear Mr. Maxwell:

This letter responds to your correspondence with the Oklahoma Bankers Association Federal Political Action Committee ("OBA★FEDELECT"), Federal Election Commission ("FEC") Identification Number C00139477.

We have received three letters from you and will address each separately below. Each of the letters identifies problems created by OBA★FEDELECT's affiliation with the American Bankers Association Bank Political Action Committee ("ABA BankPac").

Your September 7, 2001, letter concerned our April Quarterly Report (1/1/00-3/31/00). When our counsel, Lee Slater, spoke with you by telephone, you advised that OBA★FEDELECT needed to take no further action with respect to this matter, as the error (an apparent excessive contribution to a federal candidate) had been corrected, and a refund of \$500 from the Lucas for Congress Committee had been made to and reported by OBA★FEDELECT.

One of your September 12, 2001, letters concerned our Year End Report (7/1/99-12/31/99) and two separate problems. Please be advised that OBA★FEDELECT and ABA BankPac have agreed to refund \$2,500 each to Arvest Bank Group, Inc., Political Action Committee ("ARVEST PAC"). A copy of our letter to ARVEST PAC, together with a copy of an OBA★FEDELECT check to ARVEST PAC in the amount of \$2,500, is enclosed. That transaction will be shown on the next FEC report filed by OBA★FEDELECT. In addition, OBA★FEDELECT has requested the refund of \$500 from the Watkins for Congress Committee to correct another apparent error. A copy of our letter to the Watkins for Congress Committee is enclosed. We have been assured that the refund is forthcoming, and OBA★FEDELECT will include that refund in its report to the FEC next following receipt.

P.O. Box 18246 • Oklahoma City, OK 73154-0246
phone: (405)424-5252 • fax: (405)424-4518

Mr. Thomas F. Maxwell, III
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September 24, 2001

Lastly, your second September 12, 2001, letter concerned our July Quarterly Report (4/1/00-6/30/00). OBA★FEDELECT has requested the refund of \$1,000 from the Republican Majority Fund ("RMF") to correct that apparent error. A copy of our letter to RMF is enclosed. We have been assured that the refund is forthcoming, and OBA★FEDELECT will include that refund in its report to the FEC next following receipt.

Mr. Maxwell, please be advised that we already have taken action at OBA★FEDELECT to correct the situations that led to these oversights. We will work diligently to develop policies designed to preclude errors of this type from recurring.

Please let us know if there is any further action that we should take. Thank you for your consideration and cooperation.

Regards,



Roger M. Beverage
Treasurer, OBA★FEDELECT

OBA★Elect
"It's Our Future"

September 24, 2001

Karla S. Payne
Assistant Treasurer
Arvest Bank Group, Inc. PAC, Inc.
P. O. Box 799
Lowell, AR 72745

Dear Karla:

As you now know, the Oklahoma Bankers Association Federal Political Action Committee ("OBA★FEDELECT") is affiliated with the American Bankers Association Bank Political Action Committee ("ABA BankPac").

For that reason, OBA★FEDELECT and ABA BankPac may receive only \$5,000 per calendar year from another political action committee, such as the Arvest Bank Group Political Action Committee ("ARVEST PAC").

Federal Election Commission ("FEC") records indicate that on July 30, 1999, ARVEST PAC made a \$5,000 contribution to OBA★FEDELECT, and on July 26, 1999, ARVEST PAC made a \$5,000 contribution to ABA BankPac.

After consultation with ABA BankPac, we have decided that each of us will refund \$2,500, or half of the contribution we received. Enclosed, therefore, please find a refund check in the amount of \$2,500 from OBA★FEDELECT. Our refund will be reflected in the next report we file with the FEC. If you have not already received a similar refund from ABA BankPac, one should be forthcoming. Thus, ARVEST PAC's calendar year 1999 contributions to ABA BankPac and OBA★FEDELECT will be \$2,500 each, or a total of \$5,000 to our affiliated PACs.

We regret the inconvenience this has caused. We truly appreciate the support of ARVEST PAC and hope that you will continue in the future to support both OBA★FEDELECT and ABA BankPac.

Regards,



Roger M. Beverage
Treasurer, OBA★FEDELECT

P.O. Box 18246 • Oklahoma City, OK 73154-0246
phone: (405)424-5252 • fax: (405)424-4518

1012

**OKLAHOMA BANKERS
FEDERAL POLITICAL ACTION COMMITTEE**

PH. 405-424-5282
843 NE 41ST ST.
OKLAHOMA CITY, OK 73105

BB-14371051

DATE SEPT. 24, 2001

PAY TO THE ORDER OF ARVEST BANK GROUP PAC \$ 2,500.00

TWO THOUSAND FIVE HUNDRED DOLLARS AND 00/100 ***** DOLLARS

**STILLWATER NATIONAL BANK
AND TRUST COMPANY**

with locations in
Stillwater, Tulsa, Oklahoma City and Chickasha
1-800-782-4782

FOR REIMBURSE EXCESSIVE CONTRIBUTION

Debra [Signature]
Janis Reaser

⑈001012⑈ ⑆103101437⑆ ⑆6053304⑆

8475



**AMERICAN BANKERS ASSOCIATION
QUALIFIED MULTI-CANDIDATE COMMITTEE**
1120 CONNECTICUT AVENUE N.W.
WASHINGTON, DC 20005

SUNTRUST
85-270-550

Date: 09-21-01

PAY TO THE
ORDER OF

Arvest Bank Group Inc PAC

\$ 2,500.00

Two thousand five hundred and no/100 *****DOLLARS

MEMO

Other 1999 Contribution

Gary W. Fulk
Stewart

⑆00008475⑆ ⑆055002707⑆ 052021145⑆

OBA Elect
"It's Our Future"

September 24, 2001

Congressman Wes Watkins Campaign
C/o Brenda Magdeburg
Bank of Cushing
P. O. Box 951
Cushing, OK 74023-0951

Dear Brenda:

As you know, the Oklahoma Bankers Association Federal Political Action Committee ("OBA ★ FEDELECT") is affiliated with the American Bankers Association Bank Political Action Committee ("ABA BankPac").

Because OBA ★ FEDELECT and ABA BankPac are affiliated, they are collectively subject to the \$5,000 per election maximum for contributions to federal candidates, such as Congressman Watkins.

On November 11, 1999, OBA ★ FEDELECT made a \$500 contribution to the Watkins for Congress Committee for the 2000 primary election. At that time, OBA ★ FEDELECT was unaware that ABA BankPac had made contributions to the Watkins for Congress Committee totaling \$5,000 for the 2000 primary election, including a \$3,000 contribution on October 4, 1999, a \$1,000 contribution on October 4, 1999 and a \$1,000 contribution on March 16, 1999. Therefore, it appears that the collective contribution may have exceeded the maximum permitted under federal law.

For that reason, we have requested the refund of \$500 from the Watkins for Congress Committee. It is our further understanding that the Watkins for Congress Committee refund of \$500 to OBA ★ FEDELECT is forthcoming. OBA ★ FEDELECT will report the refund on its report to the Federal Election Commission next following receipt.

We regret the inconvenience and the apparent error. Please let us know how we may work together in the future.

Regards,



Roger M. Beverage
Treasurer, OBA ★ FEDELECT

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OBA Elect
"It's Our Future"

September 24, 2001

Republican Majority Fund
c/o Mike Osburn
Office of Senator Don Nickles
100 North Broadway, Suite 1820
Oklahoma City, OK 73102

Dear Mike:

As you know, the Oklahoma Bankers Association Federal Political Action Committee ("OBA ★ FEDELECT") is affiliated with the American Bankers Association Bank Political Action Committee ("ABA BankPac").

Because OBA ★ FEDELECT and ABA BankPac are affiliated, they are collectively subject to the \$5,000 per calendar year maximum for contributions to other political committees, such as the Republican Majority Fund ("RMF").

On June 22, 2000, OBA ★ FEDELECT made a \$1,000 contribution to RMF. At that time, OBA ★ FEDELECT was unaware that ABA BankPac had made a \$5,000 contribution to RMF on January 12, 2000. Therefore, it appears that the collective contribution may have exceeded the maximum permitted under federal law.

For that reason, we have requested the refund of \$1,000 from RMF. It is our further understanding that RMF's refund of \$1,000 to OBA ★ FEDELECT is forthcoming. OBA ★ FEDELECT will report the refund on its report to the Federal Election Commission next following receipt.

We regret the inconvenience and the apparent error. Please let us know how we may work together in the future.

Regards,



Roger M. Bevetage
Treasurer, OBA ★ FEDELECT

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phone: (405)424-5252 • fax: (405)424-4518

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
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The Commission has added this page to the end of this filing to indicate how it was received.

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