FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 25 1998

Pamela Archor, Treasurer
Huntington Banchares Incorporated
Political Action Committee
41 South High Street
Columbus, OH 43215

Identification Number: C00165589

Reference: Year End Report (7/1/97-12/31/97)

Dear Ms. Archor:

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:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of $5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of $5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A

supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

Scott Francis
Reports Analyst
Reports Analysis Division

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98032732871

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 22 OF 23

FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
The Huntington Bancshares Incorporated Political Action Committee (HBI-PAC)

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. The Huntington National Bank 41 S. High Street Columbus, Ohio 43215	Reception for George V. Voinovich for Senate	7-2-97	$762.00
B. Printing Plus, Inc. 7465 Worthington-Galena Road Columbus, Ohio	Printing of invitations for Voinovich reception	7-9-97	592.21
C. Citizens for Kasich 865 Macon Alley Columbus, Ohio 43206	Campaign Contribution	9-2-97	1,000.00
D. Pryce for Congress 340 E. Gay Street Columbus, Ohio 43215	Campaign Contribution	9-17-97	1,000.00
E. Friends of Congressman Ney nka Bob Ney for Congress P.O. Box 490 St. Clairsville, OH 43950	Campaign Contribution	9-26-97	500.00
F. Hollister for Congress Committee 107 Iroquois Drive Marietta, Ohio 45750	Campaign Contribution	11-28-97	1,000.00
G.			
H.			
I.			

SUBTOTAL of Disbursements This Page (optional) 4,853.21

TOTAL This Period (last page this line number only) 4,853.21

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

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FOR LINE NUMBER 23

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NAME OF COMMITTEE (in Full)
The Huntington Bancshares Incorporated Political Action Committee (HBI-PAC)

A. Full Name, Mailing Address and ZIP Code Friends of Senator D'Amato 2612 University Blvd. University Heights, OH 44118	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4-10-97	Amount of Each Disbursement This Period $ [illegible]500.00
B. Full Name, Mailing Address and ZIP Code Hobson For Congress Committee 82 W. Columbia Street Springfield, OH 45502	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2-19-97	Amount of Each Disbursement This Period $ 500.00
C. Full Name, Mailing Address and ZIP Code Kaptur for Congress Committee P.O. Box 899 Toledo, OH 43697	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 1-1-97	Amount of Each Disbursement This Period $ 50.00
D. Full Name, Mailing Address and ZIP Code Citizens for Kasich 2021 E. Dublin-Granville Road Columbus, OH 43229	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2-7-97	Amount of Each Disbursement This Period $ 1,000.00
E. Full Name, Mailing Address and ZIP Code Ohio Bank PAC - Federal 37 W. Broad Street, Suite 1001 Columbus, OH 43215-4162	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 1-14-97	Amount of Each Disbursement This Period $ 2,500.00
F. Full Name, Mailing Address and ZIP Code Ohio Chamber of Commerce PAC 230 E. Town Street Columbus, OH 43215-0159	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 5-29-97	Amount of Each Disbursement This Period $ 2,500.00
G. Full Name, Mailing Address and ZIP Code Pryce for Congress 340 E. Gay Street Columbus, OH 43215.	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 3-17-97	Amount of Each Disbursement This Period $ 4,000.00
H. Full Name, Mailing Address and ZIP Code Voinovich for Senate Committee 25201 Chagrin Blvd., Suite 200 Beechwood, OH 44122	Purpose of Disbursement Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 1-22-97	Amount of Each Disbursement This Period $ 3,280.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	$14,330.00
TOTAL This Period (last page this line number only)	$14,330.00

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SCHEDULE B — **ITEMIZED DISBURSEMENTS** (Transfers to Candidates)

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

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NAME OF COMMITTEE (in Full)
The Huntington Bancshares Incorporated Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: Primary, General, Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Volnovich for Senate Committee c/o Vince Panichi, Treasurer 25201 Chagrin Blvd., Suite 200 Beachwood, Ohio 44122	Campaign contribution	7-24-96	1,720.00
Chabot for Congress 105 W. Fourth Street, Rm. 1133 Cincinnati, Ohio 45202	Campaign Contribution	8-6-96	500.00
Handke's Cuisine 520 South Front Street Columbus, Ohio 43215	Catering services for Kasich reception	9-16-96	852.00
Frank Wobst 41 South High Street Columbus, Ohio 43215	Set up, flowers & tips for Kasich reception	9-16-96	150.42

SUBTOTAL of Disbursements This Page (optional) 3,222.42

TOTAL This Period (last page this line number only) 3,222.42

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SCHEDULE B

ITEMIZED DISBURSEMENTS
(Transfers to Candidates)

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NAME OF COMMITTEE (in Full)
Huntington Bancshares Incorporated Political Action Committee (HBI-PAC)

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Citizens for Kasich 2021 East Dublin-Granville Road Columbus, Ohio 43229	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	07/05/95	1,200.00
B. Hobson for Congress Committee 82 West Columbia Street Springfield, Ohio 45502	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	07/11/95	500.00
C. Chabot/Cremeans for Ohio Committee 560 East 7th Street Perrysburg, Ohio 43551	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	09/18/95	600.00
D. Friends of Voinovich Exploratory Committee 132 B West Second Street Perrysburg, Ohio 43553	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/17/95	1,000.00
E. Bob Ney for Congress 1212 North Vernon Street Arlington, Virginia 22201	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/27/95	500.00
F. Friends of Voinovich Exploratory Committee 132 B West Second Street Perrysburg, Ohio 43551	Campaign Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	12/14/95	1,000.00
G.	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H.	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I.	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) 4,800.00

TOTAL This Period (last page this line number only) 4,800.00